

Koeltl

JUDGE KOELTL

18 CV 5491

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

PERRY SANTILLO, CHRISTOPHER PARRIS, PAUL
ANTHONY LAROCCO, JOHN PICCARRETO,
THOMAS BRENNER, FIRST NATIONLE SOLUTION,
LLC, PERCIPIENCE GLOBAL CORPORATION, and
UNITED RL CAPITAL SERVICES,

Defendants.

18 Civ. ()

U.S. DISTRICT COURT
DOCUMENT
ELECTRONICALLY FILED
DCC#:
DATE FILED: 6/22/2018

**[PROPOSED] ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING
ORDER FREEZING ASSETS AND GRANTING OTHER RELIEF**

On the Emergency Application (the "Application") of Plaintiff Securities and Exchange
Commission (the "Commission") for an Order:

(1) Directing Defendants Perry Santillo ("Santillo"), Christopher Parris ("Parris"),
Paul Anthony LaRocco ("LaRocco"), John Piccarreto ("Piccarreto"), Thomas Brenner
("Brenner"), First Nationle Solution, LLC ("First Nationle"), Percipience Global Corporation
("Percipience"), and United RL Capital Services ("United RL") (collectively "Defendants") to
show cause why an order should not be entered, pending final disposition of this action:

(a) Temporarily restraining Defendants from violating the securities laws
identified in the Complaint and this order;

(b) Temporarily freezing Defendants' assets including but not limited to the
accounts set forth in Schedule A to this Order;

(c) Ordering Defendants to repatriate all funds, assets, or other property originating from Defendants' solicitation of investor funds, by transferring to the registry of this Court all such assets, funds, and other property held in foreign accounts in their names, or for their benefit or under their direct or indirect control, or for which they exercise control or signatory authority; and

(d) Prohibiting Defendants from destroying or altering documents in their possession, custody, or control, including documents concerning allegations in the Complaint or the assets or finances of Defendants, and ordering expedited discovery and a sworn accounting.

(2) Pending adjudication of the relief described in paragraph (1) above, an order:

(a) Temporarily restraining Defendants from violating the securities laws identified in the Complaint and this order;

(b) Temporarily freezing Defendants' assets including but not limited to the accounts set forth in Schedule A to this Order;

(c) Temporarily ordering Defendants to repatriate all funds, assets, or other property originating from Defendants' solicitation of investor funds by transferring to the registry of this Court all such assets, funds, and other property; and

(d) Temporarily prohibiting Defendants from destroying or altering documents in their possession, custody, or control, including documents concerning the allegations in the Complaint or the assets or finances of Defendants, and ordering expedited discovery and a sworn accounting.

The Court has considered: (1) the Commission's Complaint; (2) the Local Rule 6.1 Declaration of Dina Levy in Support of Plaintiff's *Ex Parte* Emergency Application for a Temporary Restraining Order, Asset Freeze, and Other Relief; (3) the Declaration of Jordan

Baker in Support of Plaintiff's *Ex Parte* Emergency Application for a Temporary Restraining Order, Asset Freeze, and Other Relief; and (4) Plaintiff Securities and Exchange Commission's Memorandum of Law in Support of Its *Ex Parte* Emergency Application for an Order to Show Cause, Temporary Restraining Order, Asset Freeze, Other Relief, and for a Preliminary Injunction.

Based on the foregoing documents, the Court finds that a proper showing, as required by Section 20(b) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. § 77t(b)], Section 21(d) of the Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78u(d)] and FRCP 65(b), has been made for the relief granted herein, for the following reasons:

1. It appears from the evidence presented that Defendants have violated Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5] by raising investor funds by misrepresenting to investors and potential investors that the money they invest is used to conduct the purported businesses of First National, Percipience, and United RL (the "Entity Defendants"), or other issuers, when in fact a significant portion of investor proceeds are used to repay redeeming investors or are misappropriated by Santillo, Parris, LaRocco, Piccarreto, and Brenner (the "Individual Defendants") for personal use, as alleged in the Complaint. And it appears likely that the Commission will prevail on the merits of its claims under these provisions.

2. It appears from the evidence presented that the Individual Defendants have violated Sections 206(1) and 206(2) of the Investment Advisers Act of 1940 ("Advisers Act") [15 U.S.C. §§ 80b-6(1) and 80b-6(2)] by raising investor funds by misrepresenting to investors and potential investors that the money they invest is used to conduct the purported businesses of

the Entity Defendants, or other issuers, when in fact a significant portion of investor proceeds are used to repay redeeming investors or are misappropriated by the Individual Defendants for personal use; and by breaching their fiduciary duties owed to the investors when they failed to use investor funds as they represented they would, and when they failed to inform investors that they were misappropriating their funds, as alleged in the Complaint. And it appears likely that the Commission will prevail on the merits of its claims under these provisions.

3. It appears from the evidence presented that, pursuant to Section 15(b) of the Securities Act [15 U.S.C. § 78o(b)] and Section 20(c) of the Exchange Act [15 U.S.C. § 78t(c)], the Individual Defendants aided and abetted violations of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5] by the Entity Defendants by acting on behalf of them and knowingly and substantially assisting them, as alleged in the Complaint. And it appears likely that the Commission will prevail on the merits of its claims under these provisions.

4. It appears that Defendants have raised at least \$102 million from investors, at least \$38.5 million was paid to out to earlier investors in Ponzi payments, and at least \$20 million was transferred to personal bank accounts of the Individual Defendants. Additionally, it appears that Defendants have transferred at least some funds to foreign accounts.

5. It appears that an order freezing Defendants' assets, as specified herein, is necessary to preserve the *status quo* and to protect the Commission's ability to collect on any final judgment of this Court ordering Defendants to disgorge ill-gotten gains, with prejudgment interest, and ordering Defendants to pay a civil penalty.

6. It appears that an order requiring Defendants to repatriate all funds, assets, or other property originating from Defendants' solicitation of investor funds, held in foreign

accounts in their names, or for their benefit or under their direct or indirect control, or for which they exercise control or signatory authority by transferring to the registry of this Court all such assets, funds, and other property – is necessary to preserve the *status quo* and to protect the Commission’s ability to collect on any final judgment of this Court ordering Defendants to disgorge illegal profits with prejudgment interest, and to pay a civil penalty.

7. It appears that an order prohibiting Defendants from destroying or altering records of any kind – including documents concerning the allegations in the Complaint or the assets or finances of Defendants – is necessary to ensure compliance with the asset freeze imposed on Defendants and to protect the integrity of this litigation.

8. Good and sufficient reasons have been shown why expedited discovery is warranted.

9. Good and sufficient reasons have been shown why an immediate accounting is necessary to identify the source, location, and use of funds obtained from investors.

10. Good and sufficient reasons have been shown why a procedure other than by notice of motion is necessary. It is therefore appropriate for the Court to issue this Order to Show Cause *ex parte* so that prompt service on appropriate financial institutions can be made, thus preventing the dissipation of assets.

11. This Court has jurisdiction of the subject matter of this action and over Defendants, and venue properly lies in this District.

NOW, THEREFORE,

I.

✓ **IT IS HEREBY ORDERED** that Defendants show cause, if there be any, to this Court at 11:00 A.m. on the 29 day of June, 2018, in Room 14A of the United States Courthouse, 500 Pearl ST., New York, New York 10007, why this Court should not enter an Order pursuant to Rule 65 of the Federal Rules of Civil Procedure directing that, pending a final disposition of this action, Defendants and each of their financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of such Order by personal service, facsimile service, telephonic notice, email notice, any other means permitted in Section VIII of this Order, or otherwise, and each of them, hold and retain within their control and otherwise prevent (except to the extent this Order requires any transfer to repatriate assets to the United States) any withdrawal, transfer, pledge, encumbrance, assignment, dissipation, concealment or other disposal (including the use of any credit cards or any other incurring of debt) of any assets, funds, or other property (including money, real or personal property, securities, commodities, choses in action or other property of any kind whatsoever, in whatever form such assets may presently exist and wherever located) of, held by, or under Defendants' control, whether in their name or for their direct or indirect beneficial interest, and directing each of the financial and brokerage institutions, debtors and bailees, or any other person or entity holding such assets, funds or other property of Defendants to hold or retain within its control and prohibit the withdrawal, removal, transfer or other disposal of any such assets, funds or other properties, including without limitation all assets, funds, or other properties

held in Defendants' name, held by Defendants, or under Defendants' control, including but not limited to the accounts listed on Schedule A.

II.

IT IS FURTHER ORDERED that Defendants show cause at that time why this Court should not also enter an Order that directs that (a) Defendants shall repatriate all funds, assets or other property originating from Defendants' solicitation of investor funds, held in foreign accounts in their names, or for their benefit or under their direct or indirect control, or for which they exercise control or signatory authority, by transferring to the registry of this Court all such assets, funds, and other property; (b) with respect to all funds and assets outside the jurisdiction of this Court that are repatriated by Defendants, such assets shall become subject to the restrictions described in paragraph I, above; and (c) with respect to any other asset owned and/or controlled by Defendants that is now located outside the jurisdiction of this Court (including, but not limited to, any monies, securities, or real or personal property), the Defendant with ownership or control over the asset shall immediately identify the location of such asset, the price paid or consideration given, and the date upon which it was purchased.

III.

IT IS FURTHER ORDERED that Defendants show cause at that time why this Court should not enter an Order enjoining and restraining them, and any person or entity acting at the direction of or on behalf of either of them, from destroying or altering any and all documents, books, and records that are in the possession, custody, or control of Defendants, their respective agents, servants, employees, and attorney, and those persons in active concert or participation with them, including documents that concern the allegations in the Complaint or Defendant's assets or finances.

IV.

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IT IS FURTHER ORDERED that, pending a hearing and determination of the Commission's Application, Defendants and each of their officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service, facsimile service, telephonic notice, email notice, and other means permitted in Section VIII of this Order, or otherwise, and each of them, are restrained from violating Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5]; The Individual Defendants and each of their officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service, facsimile service, telephonic notice, email notice, and other means permitted in Section VIII of this Order, or otherwise, and each of them, are restrained from violating Sections 206(1) and 206(2) of the ^(Advisors) Act [15 U.S.C. §§ 80b-6(1) and 80b-6(2)], and restrained from aiding and abetting violations of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)], Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)], and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5] by the Entity Defendants.

V.

IT IS FURTHER ORDERED that, pending a hearing and determination of the Commission's Application, Defendants and each of their financial and brokerage institutions, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of such Order by personal service, facsimile service, telephonic notice, email notice, and other means permitted in Section VIII of this Order, or otherwise, and each of them, hold and retain within their control and otherwise prevent (except

to the extent this Order requires any transfer to repatriate assets to the United States) any withdrawal, transfer, pledge, encumbrance, assignment, dissipation, concealment or other disposal (including the use of any credit cards or any other incurring of debt) of any assets, funds, or other property (including money, real or personal property, securities, commodities, choses in action or other property of any kind whatsoever, in whatever form such assets may presently exist and wherever located) of, held by, or under the control of Defendants, whether held in their name or for their direct or indirect beneficial interest, and directing each of the financial or brokerage institutions, debtors and bailees, or any other person or entity holding such assets, funds or other property of Defendants to hold or retain within its control and prohibit the withdrawal, removal, transfer or other disposal of any such assets, funds or other properties, including without limitation all assets, funds, or other properties held in Defendants' name, held by Defendants, or under Defendants' control.

VI.

IT IS FURTHER ORDERED that, pending a hearing and determination of the Commission's Application, (a) Defendants shall immediately repatriate all funds, assets or other property originating from Defendants' solicitation of investor funds, held in foreign accounts in their names, or for their benefit or under their direct or indirect control, or which they exercise control or signatory authority, by transferring to the registry of this Court all such assets, funds, and other property; (b) with respect to all funds and assets outside the jurisdiction of this Court that are repatriated by Defendants, such assets shall be subject to the restriction described in paragraph IV above; and (c) with respect to any other asset owned and/or controlled by Defendants that is now located outside the jurisdiction of this Court (including, but not limited to, any monies, securities, or real or personal property), the Defendants with ownership or

control over the asset shall immediately identify the location of such asset, the price paid or consideration given, and the date upon which it was purchased.

VII.

IT IS FURTHER ORDERED that, pending a determination of the Commission's Application, Defendants are enjoined and restrained, and any person or entity acting at the direction of or on behalf of any of them is enjoined and restrained from destroying or altering documents, books, and records that are in the possession, custody, or control of Defendants, their respective agents, servants, employees, and attorneys, and those persons in active concert or participation with them, including documents that concern the allegations in the Complaint or Defendants' finances.

VIII.

IT IS FURTHER ORDERED that a copy of this Order and the papers supporting the Commission's Application be served upon Defendants (or their attorneys who agree to accept service on their behalf) on or before June 20, 2018, by personal delivery, facsimile, email, overnight courier, international express mail, or first-class mail and upon any bank, savings and loan institution, credit union, financial institution, transfer agent, broker-dealer, investment company, title company, commodity trading company, storage company, or any other person, partnership, corporation, or legal entity that may be subject to any provision of this Order. For purposes of notice of anyone in possession of documents, records, assets, funds, property, or property rights, actual notice of this Order shall be deemed complete upon notification by any means, including, but not limited to, notice from distribution by facsimile transmission or electronic mail.

IX.

IT IS FURTHER ORDERED that Defendants shall deliver any opposing papers in response to the Order to Show Cause no later than June 26, 2018, at 5:00 p.m. Service shall be made by that date and time by emailing the papers to blissd@sec.gov and levydi@sec.gov, or by sending the papers by overnight courier service to the New York Regional Office of the Commission at Brookfield Place, 200 Vesey Street, Suite 400, New York, NY 10281, Attn: Dugan Bliss, or such other place as counsel for the Commission may direct in writing. The Commission shall have until June 27, 2018, at 5:00 p.m., to serve, by the most expeditious means available, any reply papers upon Defendants or their counsel, if counsel shall have made an appearance in this action.

X.

IT IS FURTHER ORDERED that, pending a hearing and the Court's adjudication of the Commission's application for an asset freeze, temporary restraining order, and preliminary injunction, the Commission's application for expedited discovery is granted and that, commencing with the time and date of this Order, in lieu of the time periods, notice provisions, and other requirements of Rules 26, 30, 33, 34, 36, and 45 of the Federal Rules of Civil Procedure, discovery shall proceed as follows:

A. Pursuant to Rule 30(a) of the Federal Rules of Civil Procedure, the Commission may take depositions upon oral examination on **three days'** notice of any such deposition. Depositions may be taken Monday through Saturday and may be taken telephonically. As to Defendants and their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them, the Commission may depose such witnesses after serving a deposition notice by e-mail upon such Defendants, and without serving a subpoena on such

witness. Depositions that have not been signed by the witness may be used for purposes of the hearing on the Commission's application;

B. Pursuant to Rule 33(a) of the Federal Rules of Civil Procedure, Defendants, and each of them, shall answer the Commission's interrogatories within **three days** of service of such interrogatories upon Defendants. Interrogatories may be served by e-mail upon such Defendants or their counsel;

C. Pursuant to Rule 34(b) of the Federal Rules of Civil Procedure, Defendants, and each of them, shall produce all documents requested by the Commission within **three days** of service of such request, with production of the documents made to blissd@sec.gov and levydi@sec.gov, or by sending the papers by overnight courier service to the New York Regional Office of the Commission at Brookfield Place, 200 Vesey Street, Suite 400, New York, NY 10281, Attn: Dugan Bliss, or such other place as counsel for the Commission may direct in writing. Requests for production may be served by e-mail upon such Defendants or their counsel;

D. Pursuant to Rule 36(a) of the Federal Rules of Civil Procedure, Defendants, and each of them, shall respond to the Commission's requests for admissions within **three days** of such requests. Requests for admission may be served by e-mail upon such Defendants or their counsel;

E. All written responses to the Commission's requests for discovery under the Federal Rules of Civil Procedure shall be delivered to blissd@sec.gov and levydi@sec.gov, or by sending the papers by overnight courier service to the New York Regional Office of the Commission at Brookfield Place, 200 Vesey Street, Suite 400, New York, NY 10281, Attn: Dugan Bliss, or such other place as counsel for the Commission may direct in writing.; and

F. In connection with any discovery from any non-party, deposition or document discovery may be had within **five days** of service of a subpoena pursuant to Rule 45. Service of a subpoena may be made by facsimile, e-mail, mail, hand or overnight courier.

XI.

IT IS FURTHER ORDERED that Defendants shall, within **five days** of the service of this order, file with this court, and serve on the Commission, a sworn accounting that identifies:

A. All funds raised in any securities offering by any Defendant(s), or any subsidiary, division, or affiliate thereof, in the form of any type of investment program, notes or any other security, listing the name, address, and phone number of each person who invested funds in such program; the amount the investor paid directly or indirectly to any of the entities and date(s) such funds were received; the current locations of all such funds; the disposition of any such funds including the date, amount, recipient, and purpose of each disbursement; the location, title, and account numbers at any financial institution to which any such funds have been transferred; and the amount of earnings paid to each investor, if any, and date of payment, and the amount of return of principal or other funds returned to each investor and date of payment;

B. All persons who received a commission, finder's fee, or any other payment relating to securities offerings by any Defendant(s), or any subsidiary, division, or affiliate thereof, in the form of any other type of investment program, note or any other security, listing the name, address, and phone number of each such person, and the amount and the date of any such payment;

C. All investments, securities, funds, real estate, financial instruments, personal and real property, and other assets held in the name of any Defendant(s), or in the name of any subsidiary, division, affiliate, or agent thereof; or under the direct or indirect control of any

Defendant(s); or in which any Defendant(s) currently have or have had a beneficial interest since July 1, 2011, providing a description and location of each such asset;

D. Each account with any bank, financial institution, or brokerage firm, whether in the United States or elsewhere, maintained in the name of any Defendant(s), or in the name of any subsidiary, division, affiliate, or agent; or under the direct or indirect control of any Defendant(s); or in which any Defendant(s) have or have had a beneficial interest since July 1, 2011; and

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E. Every transaction of ~~\$1,000.00~~ ^{\$10,000.00} or more in which the ownership, direction, or control of any funds, financial instruments, real property, or other assets of any kind have been transferred, directly or indirectly, since July 1, 2011, to or from any Defendant(s) or any subsidiary, division, affiliate, or agent thereof.

XII.

IT IS FURTHER ORDERED that is Order shall be, and is, binding upon Defendants, and each of their agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service, facsimile, email, overnight courier, or otherwise.


UNITED STATES DISTRICT JUDGE

Issued at: 11:26 a.m.
June 19, 2018
New York, New York

ojs

Schedule A

Bank	Account Number	Account Name
Bank of America	XXXXXXXX5497	Advice and Life Group LLC
Bank of America	XXXXXXXX1660	Advice and Life Group LLC
Bank of America	XXXXXXXX6985	Perry Santillo and Spouse
Bank of America	XXXXXXXX0725	Boyle's America LLC
Bank of America	XXXXXXXX3696	Boyles America, LLC
Bank of America	XXXXXXXX2256	Chris A Parris
Bank of America	XXXXXXXX7197	Chris A Parris
Bank of America	XXXXXXXX6610	Chris A Parris
Bank of America	XXXXXXXX5508	Chris A Parris
Bank of America	XXXXXXXX6530	Chris A Parris
Bank of America	XXXXXXXX6543	Chris A Parris
Bank of America	XXXXXXXX7612	Chris A Parris and 1 Other
Bank of America	XXXXXXXX6607	Chris A Parris and 1 Other
Bank of America	XXXXXXXX6556	Chris A. Parris
Bank of America	XXXXXXXX2646	Enrollment Centers of America LLC
Bank of America	XXXXXXXX6235	First American Holdings LLC
Bank of America	XXXXXXXX2556	First Nationle Solution LLC
Bank of America	XXXXXXXX9874	First Nationle Solution LLC
Bank of America	XXXXXXXX5907	First Nationle Solution LLC
Bank of America	XXXXXXXX5981	First Nationle Solution LLC
		First Nationle Solution LLC
Bank of America	XXXXXXXX1039	Buffalo-General
		First Nationle Solution LLC
Bank of America	XXXXXXXX0797	Buffalo-Maintenance
		First Nationle Solution LLC
Bank of America	XXXXXXXX0771	Buffalo-Rental
		First Nationle Solution LLC
Bank of America	XXXXXXXX0784	Buffalo-Security Deposits
		First Nationle Solution LLC
Bank of America	XXXXXXXX0807	Buffalo-Taxes
		First Nationle Solution LLC
Bank of America	XXXXXXXX0823	Buffalo-Utilities
		First Nationle Solution LLC
Bank of America	XXXXXXXX8676	C/O Lucian Development LLC
		First Nationle Solution LLC
Bank of America	XXXXXXXX0810	General
		First Nationle Solution LLC
Bank of America	XXXXXXXX8600	Pending Transfers
		First Nationle Solution LLC
Bank of America	XXXXXXXX6578	Utica-General
		First Nationle Solution LLC
Bank of America	XXXXXXXX6581	Utica-Maintenance
		First Nationle Solution LLC
Bank of America	XXXXXXXX9133	Utica-Rental
		First Nationle Solution LLC
Bank of America	XXXXXXXX9146	Utica-Security Deposits
		First Nationle Solution LLC
Bank of America	XXXXXXXX9159	Utica-Taxes
		First Nationle Solution LLC
Bank of America	XXXXXXXX9162	Utica-Utilities
Bank of America	XXXXXXXX0100	Genvest III LLC
Bank of America	XXXXXXXX2271	Genvest IV LLC
		Genvest LLC
		Perry Santillo Jr
Bank of America	XXXXXXXX8595	Operating Account
Bank of America	XXXXXXXX2381	Genvest LLC Rental Account
Bank of America	XXXXXXXX1507	Genvest V
Bank of America	XXXXXXXX7726	Genvest VI LLC
Bank of America	XXXXXXXX6484	Genvest VII Genesis Fund
Bank of America	XXXXXXXX1853	Horizon Asset Protection LLC
Bank of America	XXXXXXXX9577	John C. Piccarreto
Bank of America	XXXXXXXX4942	John C. Piccarreto
Bank of America	XXXXXXXX0622	John C. Piccarreto

Schedule A

Bank	Account Number	Account Name
Bank of America	XXXXXXXX1150	John C. Piccarreto
Bank of America	XXXXXXXX2855	Lucian Development
Bank of America	XXXXXXXX6059	Lucian Development LLC
Bank of America	XXXXXXXX2268	Lucian Development LLC
Bank of America	XXXXXXXX8090	Lucian Development LLC
Bank of America	XXXXXXXX8757	Lucian Development LLC
Bank of America	XXXXXXXX6507	Lucian Development LLC
Bank of America	XXXXXXXX8508	Chris A Parris (Travel Account) Lucian Development LLC
Bank of America	XXXXXXXX0025	Detroit-Maintenance Lucian Development LLC
Bank of America	XXXXXXXX1485	Lucian Escrow Lucian Development LLC
Bank of America	XXXXXXXX2734	Rental Account Lucian Development LLC
Bank of America	XXXXXXXX7738	Wayne Diversified Lucian Development LLC
Bank of America	XXXXXXXX2596	Working Capital
Bank of America	XXXXXXXX7469	Lucian Group Inc Male Medica LLC
Bank of America	XXXXXXXX8782	DBA Advanced Medica LLC
Bank of America	XXXXXXXX6374	Middlebury Development LLC
Bank of America	XXXXXXXX6387	Middlebury Development LLC
Bank of America	XXXXXXXX8642	Ocala Investments LLC
Bank of America	XXXXXXXX5224	Paul A LaRocco and 1 Other
Bank of America	XXXXXXXX9324	Percipience LLC
Bank of America	XXXXXXXX8710	Percipience LLC
Bank of America	XXXXXXXX6332	Percipience LLC
Bank of America	XXXXXXXX6329	Percipience Real Est. Opp Fund
Bank of America	XXXXXXXX2475	Perry C Santillo Jr Genvest II LLC
Bank of America	XXXXXXXX2430	Perry Santillo Jr
Bank of America	XXXXXXXX1853	Perry Santillo Jr and 1 Other
Bank of America	XXXXXXXX8107	Perry Santillo Jr and 1 Other
Bank of America	XXXXXXXX9884	Royalty One Enterprises LLC
Bank of America	XXXXXXXX2633	Royalty One Enterprises LLC
Bank of America	XXXXXXXX6293	Sacramento Investments LLC
Bank of America	XXXXXXXX8882	Senior Advocates Plus LLC
Bank of America	XXXXXXXX6206	The Berkley Development Company LLC
Bank of America	XXXXXXXX8940	The Berkley Development Company LLC
Bank of America	XXXXXXXX9062	The Berkley Development Company LLC
Bank of America	XXXXXXXX2070	The Berkley Development Company LLC
Bank of America	XXXXXXXX8511	The Berkley Development Company LLC Operating Account
Bank of America	XXXXXXXX6222	The Berkley Development Company LLC Dividend Account
Bank of America	XXXXXXXX9942	The Berkley Development Company LLC Michigan Maintenance
Bank of America	XXXXXXXX9926	The Berkley Development Company LLC Michigan Rental
Bank of America	XXXXXXXX9939	The Berkley Development Company LLC Michigan Security Deposits
Bank of America	XXXXXXXX9803	The Berkley Development Company LLC Michigan Taxes
Bank of America	XXXXXXXX9913	The Berkley Development Company LLC Michigan Utilities
Bank of America	XXXXXXXX9735	The Berkley Development Company LLC Ohio General
Bank of America	XXXXXXXX9887	The Berkley Development Company LLC Ohio Maintenance
Bank of America	XXXXXXXX9984	The Berkley Development Company LLC Ohio Rental
Bank of America	XXXXXXXX9997	The Berkley Development Company LLC Ohio Security Deposits
Bank of America	XXXXXXXX9890	The Berkley Development Company LLC Ohio Taxes
Bank of America	XXXXXXXX0009	The Berkley Development Company LLC Ohio Utilities
Bank of America	XXXXXXXX8605	The Genesis Fund LLC
Bank of America	XXXXXXXX2585	The Lucian Grp Inc
Bank of America	XXXXXXXX8786	TSDP Capital LLC
Bank of America	XXXXXXXX6471	TSDP Capital LLC
Bank of America	XXXXXXXX5963	United RL Capital Services LLC
Bank of America	XXXXXXXX2404	Wayne Diversified, LLC

Schedule A

Bank	Account Number	Account Name
Citizens Bank	XXXXXX5047	Advice and Life Group, LLC
Citizens Bank	XXXXXX2836	Boyles America, LLC
Citizens Bank	XXXXXX1616	Christopher Parris
Citizens Bank	XXXXXX3217	Christopher Parris
Citizens Bank	XXXXXX3921	First Nationle Solutions, LLC First Nationle Solutions, LLC
Citizens Bank	XXXXXX4405	Rental Account First Nationle Solutions, LLC
Citizens Bank	XXXXXX7370	Secondary Account First Nationle Solutions, LLC
Citizens Bank	XXXXXX6051	Utica Security Deposit Account Lucian Development LLC
Citizens Bank	XXXXXX4391	Rental Account
Citizens Bank	XXXXXX2933	Lucian Development, LLC
Citizens Bank	XXXXXX4146	Male Medica LLC
Citizens Bank	XXXXXX5160	Male Medica, LLC
Citizens Bank	XXXXXX5217	Middlebury Development
Citizens Bank	XXXXXX4049	Ocala Investments LLC
Citizens Bank	XXXXXX2925	Percipience LLC
Citizens Bank	XXXXXX4162	Percipience LLC
Citizens Bank	XXXXXX3195	Perry Santillo
Citizens Bank	XXXXXX0741	Perry Santillo Jr.
Citizens Bank	XXXXXX5209	Pocono's Investments, LLC
Citizens Bank	XXXXXX5128	Senior Advocates Plus, LLC
Citizens Bank	XXXXXX3751	United RL Capital Services LLC
Citizens Bank	XXXXXX5101	United RL Capital Services LLC
Citizens Bank	XXXXXX5101	UNITED RL CAPITAL SERVICES LLC
Comerica Bank	XXXXXX9402	Percipience Global Corporation Inc.
Comerica Bank	XXXXXX9378	Percipience/1st American C/O Special Corporate Financial Services
Community Choice Credit Union	XXX9701	Christopher Parris
Community Choice Credit Union	XXX3805	FNS Holdings LLC
Community Choice Credit Union	XXX8582	Middlebury Development LLC
Community Choice Credit Union	XXX3978	Thomas Brenner
Community Choice Credit Union	XXX8594	United RL Capital Services LLC
E*Trade	XXXX9981	John Piccarreto
ESL Federal Credit Union	XXXXXX1412	Advice and Life Group, LLC
ESL Federal Credit Union	XXXXXX9475	First Nationle Solution LLC
ESL Federal Credit Union	XXXXXX9483	First Nationle Solution LLC
ESL Federal Credit Union	XXXXXX9491	First Nationle Solution LLC
ESL Federal Credit Union	XXXX2337	John C. Piccarreto
ESL Federal Credit Union	XXXXX3320	John C. Piccarreto
ESL Federal Credit Union	XXXXX3990	John C. Piccarreto
ESL Federal Credit Union	XXXXX3400	John C. Piccarreto
ESL Federal Credit Union	XXXX2399	John Piccarreto
ESL Federal Credit Union	XXXXXX4624	John Piccarreto
ESL Federal Credit Union	XXXXXX1098	UNITED RL CAPITAL SERVICES
ESL Federal Credit Union	XXXXXX0419	UNITED RL CAPITAL SERVICES LLC
Farmers National Bank	XXX5472	Thomas Brenner & 1 Other
Farmers National Bank	XXX5976	Thomas Brenner & 1 Other
Five Star Bank	XXXXXX3727	PERRY SANTILLO JR
Genesee Regional Bank	XXXXX3086	First Nationle Solution LLC Operating
Genesee Regional Bank	XXXXX3078	Middlebury Development LLC Operating Agreement
Genesee Regional Bank	XXXXX3094	United RL Capital Services LLC Operating Account Advice and Life Group LLC DBA High Point Insurance Solution, LLC
IBERIABANK	XXXXXX4623	Commissions & Expenses Advice and Life Group LLC
IBERIABANK	XXXXXX8415	High Point Insurance Solution, LLC
IBERIABANK	XXXXXX8431	First Nationle Solution LLC
IBERIABANK	XXXXXX8423	Male Medica LLC Advanced Medica LLC
IBERIABANK	XXXXXX8393	MD Call Connect, LLC
IBERIABANK	XXXXXX8407	Senior Advocates Plus LLC
JP Morgan Chase	XXXXX3137	Advanced Medica LLC
JP Morgan Chase	XXXXX3975	Advice and Life Group LLC dba High Point Insurance Solutions

Schedule A

Bank	Account Number	Account Name
JP Morgan Chase	XXXXX6655	Boyle's America LLC
JP Morgan Chase	XXXXX0391	First Nationle Solution LLC
JP Morgan Chase	XXXXX9905	Male Medica LLC DBA Advanced Medica
JP Morgan Chase	XXXXX5656	Middlebury Development LLC
Key Bank	XXXXXX1510	John C. Piccarreto
Key Bank	XXXXXXXX0290	Middlebury Development LLC
Key Bank	XXXXXXXX1249	Middlebury Development LLC
Key Bank	XXXXXXXX0282	United RL Capital Services
Key Bank	XXXXXXXX1231	United RL Capital Services
M&T Bank	XXXXXX4417	First Nationle Solutions LLC
M&T Bank	XXXXXX4433	Lucian Development LLC
M&T Bank	XXXXXX4425	Percipience LLC
National City Bank	XXX0984	Thomas E. Brenner, Jr. DBA Wall Street on Main
Northwest Bank	XXXXXX6778	First Nationle Solution LLC
Northwest Bank	XXXXXX7677	John Piccarreto
Northwest Bank	XXXXXX9038	John Piccarreto
Northwest Bank	XXXXXX8808	Lucian Development LLC
Northwest Bank	XXXXXX2491	Lucian Group Incorporated
Paypal	XXXXXXXXXXXXXXXX5064	Perry Santillo
PNC Bank	XXXXXX2046	Thomas Brenner
PNC Bank	XXXXXX2513	Thomas E. Brenner, Jr. DBA Wall Street on Main
PNC Bank	XXXXXX4232	Torr LLC
The Commercial & Savings Bank	XXX3229	1 Other and Thomas Brenner Jr.
The Commercial & Savings Bank	XXX7361	1 Other and Thomas Brenner Jr.
The Commercial & Savings Bank	XXX8034	First American Securities Inc. (Brenner as signer)
The Commercial & Savings Bank	XXX9320	Perry Santillo C/O Crown Investments
The Commercial & Savings Bank	XXX7335	Royal Lab Services LLC
The Commercial & Savings Bank	XXX4541	Thomas Brenner Jr
The Commercial & Savings Bank	XXX2867	Torr LLC
Wells Fargo	XXXXXX1913	Boyle's America LLC
Wells Fargo	XXXXXX2622	JOHN C PICCARRETO
Wells Fargo	XXXXXX2895	John Piccarreto
Wells Fargo	XXXXXX2671	John Piccarreto
Wells Fargo	XXXXX0773	MD Call Connect, LLC
Wells Fargo	XXXXX0503	Perry C Santillo
Wells Fargo	XXXXXX4122	PERRY SANTILLO JR
Wells Fargo	XXXXXX2223	United RL Capital Services LLC
Wells Fargo Advisors	XXXXXXXXXXXX8194	Paul LaRocco