

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

*In re:*

Case No.: 12-30081-BKC-EPK

CLSF III IV, Inc., *et al.*,

Chapter 7  
(Jointly Administered)

Debtors.

/

**MQIC'S RENEWED<sup>1</sup> MOTION FOR ALLOWANCE AND PAYMENT OF  
ADMINISTRATIVE EXPENSE**

Maatschap QI Collectief ("MQIC" or the "Creditor"), on behalf of itself and its investor members, by and through undersigned counsel, moves pursuant to sections 503(b)(1) and 105 of title 11 of the United States Code (the "Bankruptcy Code") for the allowance and payment of an administrative expense in the amount of \$5,658,828.43 incurred by MQIC for the benefit of the bankruptcy estates of CLSF III IV, Inc. ("CLSF III/IV") and its consolidated co-debtors and alter egos (the "Debtors"). In support of the Motion, MQIC states:

**BACKGROUND**

1. On August 22, 2012 (the "Petition Date"), along with Peter H.M.A. Ortmans, Mildred A.H. Ortmans, and Marc Vandoorne, (together with MQIC, the "Petitioning Creditors"), MQIC filed an involuntary petition under chapter 7 of the Bankruptcy Code against CLSF III/IV, a Florida entity incorporated by Deborah C. Peck ("Peck"). Before the Petition Date, Peck and her co-conspirators' mismanagement of the policy portfolio, failure to vet a fraudulent reinsurance provider, failure to maintain adequate premium reserves, unconscionable taking of "profits" and excessive management fees, failure to observe corporate and trust formalities, illegal wire transfers, attempts to sell the policy portfolio for a fraction of its value,

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<sup>1</sup> MQIC previously withdrew its Amended Motion for Allowance and Payment of Administrative Expense [ECF# 460] in order to procure additional documents from Litai related to the Motion. MQIC received production from Litai and now renews its motion.

**EHRENSTEIN CHARBONNEAU CALDERIN**

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misrepresentations to investors, and other acts of fraud and defalcation<sup>2</sup> caused the 650 investors that formed MQIC to organize and pool additional monies for the purpose of preserving, to the extent possible, the policy portfolio and to pursue legal remedies against Peck and the others responsible for the hundreds of millions of dollars in investor losses.

2. The Petitioning Creditors filed the *Petitioning Creditors' Omnibus Emergency Motion for Order Directing Appointment of Interim Trustee* (the "Trustee Motion") [ECF #3] on the Petition Date, seeking immediate appointment of an interim trustee for CLSF III/IV. On August 24, 2012, the Bankruptcy Court conducted an evidentiary hearing on the Trustee Motion (the "Trustee Hearing"). Among other improprieties, Peck testified at the Trustee Hearing that almost no reserves existed to preserve the policy portfolio and that she had and would continue to commingle investor funds such that tracing which investor contributions went to maintain which insurance policies would be impossible. These acts violated the fund prospectuses, the terms of each trust, and Peck's fiduciary duties in her capacity as trustee of the trusts. Based on Peck's testimony, the documentary evidence presented by the Petitioning Creditors, and the arguments raised by the Petitioning Creditors at the Trustee Hearing, the Court granted the Trustee Motion [ECF #13]. On August 28, 2012, the United States Trustee's Office appointed Deborah Menotte (the "Interim Trustee") as interim chapter 7 trustee for the CLSF III/IV bankruptcy estate.

3. On October 16, 2012, the Court entered the *Order for Relief in Involuntary Case and Order Setting Deadline for Filing Schedules, Statements and Other Documents* [ECF #77] (the "Order for Relief"). The Interim Trustee was subsequently appointed as the chapter 7

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<sup>2</sup> These acts and others are set forth in detail in the Trustee Motion.

trustee (the “Trustee”) for CLSF III/IV [ECF #86]. Thereafter, Ms. Menotte was appointed the permanent Chapter 7 trustee of the jointly administered cases. [ECF# 320].

4. Commencing on October 24, 2012 and continuing to November 7, 2012, the remaining Debtors filed voluntary petitions for relief under chapter 7 of the Bankruptcy Code.

5. On February 26, 2013, the Court entered an *Order Granting Chapter 7 Trustee’s Motion to Approve Servicing Agreement Between Trustee and Litai Assets, LLC, Nunc Pro Tunc to October 25, 2012* [ECF #277], which approved the Servicing Agreement dated October 25, 2012 (the “Servicing Agreement”) between the Trustee and Litai Assets, LLC (“Litai”). Under the Servicing Agreement, Litai performed certain services for the Trustee, including Policy Services, Life Verification Services, Maturity Management Services, Accounting and Reporting Services, Closing Services and Miscellaneous Other Services with respect to certain life insurance policies that were or are property of the Debtors’ estates.<sup>3</sup>

6. The various debtor estates and certain alter ego and related entities have been consolidated,<sup>4</sup> and the policies of each consolidated entity have been marketed and almost all have been sold.<sup>5</sup>

7. Until July 2013, MQIC made premium payments with respect to all or substantially all of the policies that were property of the jointly administered estates and those of the various substantively consolidated alter egos and related entities,<sup>6</sup> including policies in which MQIC did not have an interest, in order to preserve the policies for the benefit of the estates and

<sup>3</sup> More information regarding the services provided by Litai is set forth in greater detail in the *Chapter 7 Trustee’s Motion to Approve Servicing Agreement Between Trustee and Litai Assets, LLC, Nunc Pro Tunc to October 25, 2012* [ECF #135].

<sup>4</sup> See ECF# 561, *Order Granting Trustee’s Second Amended Motion for Substantive Consolidation of these Jointly Administered Bankruptcy Estates*; and the orders adding various alter egos to the consolidated estate: ECF# 579, 673.

<sup>5</sup> See ECF#s 515, 651, 664.

<sup>6</sup> The Trustee has sold substantially all of the policy portfolio and the proceeds of such sales have exceeded \$10 million. [ECF# 593]. This sum excludes the proceeds from the maturity of the Shea Policy. See ECF# 594.

all creditors. In addition to paying the premiums, MQIC also has paid most of the fees for the services Litai provided in managing and maintaining the policy portfolio. MQIC was not otherwise obligated to pay the premiums associated with the policies or to pay Litai's fees, but instead initiated this case to remove the policies from the management and control of Peck and her cohorts and put them in the hands of a fiduciary subject to court oversight. Throughout the case, MQIC paid policy premiums without regard to whether it had a claim to the potential proceeds of the maintained policies.<sup>7</sup> It cannot be disputed that the estates and all creditors have received a concrete benefit from the premiums that MQIC has funded and the services that Litai provided and for which MQIC has paid.

8. In July 2013, however, MQIC ultimately determined that it would no longer continue to fund the Debtors' insurance premiums and ceased making such payments. Afterward, the Trustee sought emergency funding from SPQI, which was ultimately funded by MQIC, and the policy portfolio was sold for an amount that was substantially higher than investors would have received if MQIC had not taken action to prevent Peck from transferring the entire portfolio before the Petition Date.

#### **JURISDICTION AND VENUE**

9. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157(b) and 1334. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

10. This matter is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2). The statutory predicates for the relief requested herein are sections 105 and 503 of the Bankruptcy Code.

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<sup>7</sup> MQIC, however, recognizes that its membership comprises the majority of defrauded investors and that paying the premiums on those policies in which it had an interest would, of course, benefit MQIC as well as other beneficiaries of those policies.

**RELIEF REQUESTED**

11. By this Motion, MQIC requests entry of an order authorizing and allowing the Trustee to pay to MQIC \$5,658,828.43 as an administrative expense that is *pari passu* with all other allowed administrative expenses in the case for the actual, necessary costs of preserving the policy portfolio and enabling the estate to realize the more than \$10 million in proceeds from the sale of the portfolio. MQIC's administrative expense is composed of two principal parts: (1) \$816,389.73 that MQIC paid directly to insurance carriers between August 23, 2012, and November 14, 2012 (2) \$4,842,438.7 that MQIC paid to Litai for insurance premiums and Litai's invoices for services rendered to the Trustee.

12. MQIC has attached as **Exhibit A**, a spreadsheet that records all payments made directly to insurance carriers for each policy within the portfolio for the period covering August 23, 2012 to November 14, 2012. In addition, **Exhibit A** sets forth all payments made from MQIC to Litai that covered payments to carriers as well as Litai's invoices.

13. Attached as composite **Exhibit B** are Litai's records of fund transfers received from MQIC into Litai's account at Citibank and checks written from that account to various insurance carriers for policy premiums for the period covering October 2012 through December 2012. Attached as composite **Exhibit C** are Litai's records of fund inflows and premium payments from Litai's "QI Premium Account," which is the segregated fund that Litai established for processing payments related to the policy portfolio. Attached as composite **Exhibit D** are Litai's invoices that detail amounts billed to the Trustee, but paid for by MQIC.

### **BASIS FOR RELIEF**

14. Section 503(b) of the Bankruptcy Code permits a party to be reimbursed, on an administrative priority basis, for the “actual” and “necessary” costs and expenses of preserving the estate. 11 U.S.C. 503(b)(1)(A). Specifically, section 503(b) provides, in pertinent part:

(b) After notice and a hearing, there shall be allowed, administrative expenses, other than claims allowed under 502(f) of this title, including . . .

(1)(A) the actual, necessary costs and expenses of preserving the estate. . . .

11 U.S.C. § 503(b). “The Eleventh Circuit has interpreted this Code provision to require not only that the expense be ‘actual’ and ‘necessary,’ but also that there be a concrete benefit to the debtor’s estate.” *In re Beverage Canners Int’l*, 255 B.R. 89, 93 (Bankr. S.D. Fla. 2000) (*citing In re Subscription Television of Greater Atlanta*, 789 F.2d 1530 (11th Cir. 1986)). The inquiry is subjective and is determined on a case-by-case basis. *See In re Moody & Sons, Inc.*, 473 B.R. 828, 836 (Bankr. M.D. Fla. 2012). In essence, the court should determine whether the services maximized the value of the estate, for the estate’s creditors. *Id.*

15. By making premium payments from August 22, 2013 through June 2013 and paying Litai’s fees on behalf of the estate, MQIC ensured that the policies—the primary assets of these now-consolidated estates—were preserved for the benefit of all creditors and parties in interest. If the premiums were not paid and the policies were permitted to lapse, the value of the consolidated estates would have been critically diminished. Thus, paying the premiums and Litai’s fees were actual and necessary expenses of preserving the estates and MQIC’s payment of such expenses provided an undeniable concrete benefit. MQIC provided an interest free loan to the estate and its creditors at a time when the policy portfolio was in severe distress and Peck’s mismanagement and attempts to unload the portfolio for almost no consideration had severely

depressed its value. MQIC's efforts restored significant value to the portfolio, and it should be reimbursed for the benefit that it provided.

16. Accordingly, the Court should allow MQIC an administrative expense in the amount of \$5,658,828.43 with a priority that is *pari passu* with all other allowed administrative expenses in the case, and direct that payment be made to MQIC.

### **CONCLUSION**

**WHEREFORE**, MQIC respectfully requests the entry of an order (i) allowing MQIC an administrative priority claim under section 503(b) of the Bankruptcy Code in the amount of \$5,658,828.43 that is *pari passu* with all other allowed administrative expenses in the case, (ii) authorizing and directing the trustee to pay such amount to MQIC immediately, and (iii) granting such further relief as the Court deems just and appropriate.

***I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this Court set forth in Local Rule 2090-1(A).***

Respectfully submitted by:

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By: /s/ Daniel Gold  
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Florida Bar No. : 44770  
mpetrie@ecclegal.com

# **Exhibit “A”**

## Payments to MQIC since 08/22/2012

	N° bank statement	date	amount €	amount \$	name	account	policy	info	
<b>Payments to Carriers</b>									
	93	08/23/12	€ 26,120.19	\$32,583.75	LINCOLN FINANCIAL	3750 0114 27	CLSF 33	PREMIUM PAYMENT POLICY 180000054 INSURED KLAU ROSEN FG POLICY OWNER BG1 TRUST XXXIII	
	95	08/29/12	€ 79,268.99	\$98,821.43	JOHN HANCOCK LIFE INSUR	3750 0114 8502	CLSF 34-36	PREMIUM PAYMENT POLICY 193707727 INSURED RITA SINDER POLICY OWNER CLSF 34-36 TRUST	
	96	09/03/12	€ 20,313.43	\$25,372.37	LINCOLN FINANCIAL	3750 0114 27	CLSF 38	PREMIUM PAYMENT POLICY L7006974 INSURED VERA G. BRODY POLICY OWNER CLSF TRUST XXXVII	
	99	09/18/12	€ 43,502.51	\$56,550.00	AXA FORTIFIABLE LLC	3750 3701 97	CLSF 35	PREMIUM PAYMENT POLICY 400961 INSURED MARIA LUISA R YAN POLICY OWNER BG1 14 TRUST	
	99	09/18/12	€ 21,484.70	\$37,870.84	ING RELIASTAR	6355 0531 68	BG1 14	PREMIUM PAYMENT POLICY 46734374 INSURED MARGARET GELB POLICY NO 56734374	
	101	10/02/12	€ 51,898.23	\$66,688.50	ING BANK OF NEW YORK	8900 4889 21	CLSF 14	RETURN U/BET DD02/10/TGV BANK OF NEW YORK REDEN ROUTIEVE GEG. BEGUNSTIGDE	
	104	10/09/12	€ 50,846.71	\$66,688.50	RETURN	502 0115 05	CLSF 14	INSURED ROBERT D. ANDERSON OWNER CLSF 12 TRUST	
	105	10/12/12	€ 32,597.76	\$42,015.65	LINCOLN FINANCIAL	3750 0114 27	CLSF 12	POLICY FEYGA DARMANYAN JF551667/8 OWN/E R CLSF 3 & 4	
	107	10/17/12	€ 38,292.07	\$128,153.20	LINCOLN FINANCIAL	3750 0114 27	CLSF 3-4	INSURED ROBERT S. HERSKOWITZ POLICYNO JF551667/8 OWN/E R CLSF 26	
	110	10/26/12	€ 30,733.86	\$39,423.32	LINCOLN FINANCIAL	3750 0114 27	CLSF 26	POLICY NO Q1N1308636 RUTH ANDERSON OWNER CLSF 26	
	118	11/09/12	€ 90,198.81	\$113,787.76	JOHN HANCOCK LIFE INSUR	5341 7886	BG1 18	EMILIA D. SABATO NR ULO01206929 BG1F 18	
	118	11/09/12	€ 67,771.06	\$85,490.90	JOHN HANCOCK LIFE INSUR	5341 7886	CLSF 40	EMILIA D. SABATO NR ULO01206934 CLSF 40	
	118	11/09/12	€ 67,795.78	\$85,471.63	JOHN HANCOCK LIFE INSUR	5341 7886	BG1 19	EMILIA D. SABATO NR ULO01206933 BG1F 19	
	121	11/14/12	€ 63,929.00	\$80,854.48	JOHN HANCOCK LIFE INSUR	5341 7886	BG1 22	MATES TEICHMAN POLICY 93488153 OWNER R/GIF 22	
	<b>\$816,389.33</b>								
<b>Payments to Itai</b>									
	111	10/29/12	€ 104,260.13	\$133,634.25	LITAL ASSETS LLC	9118 6260 82	CLSF 14	MQIC REIMBURSEMENT FOR CLSF 14	
	113	10/31/12	€ 7,357.61	\$9,500.00	LITAL ASSETS LLC	9118 6260 82	LSF 3	REIMBURSEMENT LSF III	
	125	11/22/12	€ 52,709.02	\$67,527.76	LITAL ASSETS LLC	9118 6260 82	CLSF 26 + CLSF 42a	REIMBURSEMENT CLSF XXVI + CLSF XII-A	
	133	12/05/12	€ 470,134.81	\$612,947.66	LITAL ASSETS LLC	9118 6260 82	BG1 18	PREMIUM FUND MQIC	
	134	12/07/12	€ 53,352.59	\$68,400.00	LITAL ASSETS LLC	9118 6260 82	Leifer trust	REIMBURSEMENT FLORA LEIFER POLICY	
	139	12/19/12	€ 358,942.24	\$474,195.36	LITAL ASSETS LLC	9118 6260 82		MQIC PREMIUMS NOV - DEC. JAN/FEB/1	
	141	12/29/12	€ 226,939.23	\$429,350.00	LITAL ASSETS LLC	9118 6260 82		PREMIUMS NOV/DEC/JAN PART 2+PREMIUM SINDER	
	2	01/28/13	€ 432,726.55	\$578,108.83	LITAL ASSETS LLC	9118 6260 82		PREMIUMS MQIC FEBRUARY	
	4	02/11/13	€ 450,275.01	\$600,000.00	LITAL ASSETS LLC	9118 6260 82		PREMIUMS MQIC MARCH 2013	
	5	02/21/13	€ 94,722.57	\$124,186.14	LITAL ASSETS LLC	9119 6260 82		PREMIUMS MQIC MARCH 2013 part 2	
	6	02/22/13	€ 72,338.59	\$94,739.17	LITAL ASSETS LLC	9120 6260 82	SINDER	PREMIUMS SINDER POLICY	
	12	04/05/13	€ 245,409.00	\$315,404.33	LITAL ASSETS LLC	9121 6260 82		premiums april	
	14	04/30/13	€ 454,737.00	\$590,944.24	LITAL ASSETS LLC	9122 6260 82		premiums may 2013	
	20	05/17/13	€ 568,682.02	\$724,186.11	LITAL ASSETS LLC	9123 6260 82		premiums june 2013	
	24	09/12/13	€ 8,830.17	\$11,661.02	LITAL ASSETS LLC	9124 6260 82		invoice 276	
	<b>\$4,834,785.44</b>								
	<b>compensated invoices</b>								
	inv. sept 2013		invoice 286		\$6,184.76				
	inv oct 2013		invoice 315		\$1,468.50				
	<b>total</b>		<b>\$5,658,228.43</b>						

# **Exhibit “B”**

LITAI ASSETS LLC

Account 33 Page 4 of 22  
Statement Period: Oct 1 - Oct 31, 2012

0-0/R1/21F016

**CHECKING ACTIVITY****Continued**

Date	Description	Debits	Credits	Balance
10/29				
10/29				
10/29				
10/30				
10/30				
10/30				
10/30				
10/30	FUNDS TRANSFER WIRE FROM JAN DE SCHEPPER A VOCAT BVBA Oct 31			133,634.25
10/31		450.00		
10/31				
10/31				
10/31				
10/31				
1				

**CUSTOMER SERVICE INFORMATION****IF YOU HAVE QUESTIONS ON:**

Checking

**YOU CAN CALL:**

877-528-0990  
 (For Speech and Hearing  
 Impaired Customers Only  
 TDD: 800-945-0258)

**YOU CAN WRITE:**

CitiBusiness  
 100 Citibank Drive  
 San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

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Citibank CBO Services  
PO Box 226526  
Dallas, TX 75222-6526

124

00035694 BB CCC 335 JSW1#5IC BB1 1FS 0

**CitiBusiness®**

0-0/R1F21F016

052  
CITIBANK, N. A.  
**Account**

**3**  
**Statement Period**  
**Nov 1 - Nov 30, 2012**  
**Relationship Manager**  
Beck, Joseph F  
(954) 958-8549

Page 1 of 16

ChiBusiness® ACCOUNT AS OF NOVEMBER 30, 2012

### **Relationship Summary:**

## **Checking Savings Checking Plus**

**SERVICE CHARGE SUMMARY FROM OCTOBER 1, 2012 THRU OCTOBER 31, 2012**

Type of Charge	No./Units	Price/Unit	Amount
CITIBUSINESS FLEXIBLE CHECKING:			
Average Daily Collected Balance			
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH			
**WAIVE			
TRANSFER SERVICES			
INCOMING WIRE TRANSFER			
**WAIVE			
<b>Total Charges for Services</b>			
<b>Net Service Charge</b>			

## CHECKING ACTIVITY

## CitiBusiness® Flexible Checking

072813350054010001 NNNN-NNNN-NNNN-NNNN

11/05 FUNDS TRANSFER  
WIRE FROM JAN DE SCHEPPER A VOCAAUT BVBA Nov 05

9,500.00



LITAI ASSETS LLC

**CitiBusiness®**

0-0/R1/21F016

Account 33 Page 3 of 16  
Statement Period: Nov 1 - Nov 30, 2012

## CHECKING ACTIVITY

**Continued**

Date	Description	Debits	Credits	Balance
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11/23 CREDIT NO. 907  
11/26 FUNDS TRANSFER 67,527.76  
WIRE FROM JAN DE SCHEPPER A VOCAT. BVBA Nov. 26

NNNN-NNNN-NNNN-NNNN  
D72813350054010002\*



Citibank CBO Services  
PO Box 226526  
Dallas, TX 75222-6526

124

00037637 BB CCC 366 JSW1#5IC XL1 OR6 0



LITAI ASSETS LLC  
43 S POMPANO PARKWAY Suite 112  
POMPANO BEACH FL 33069-4843

CitiBusiness®

*Lit-Code 6 (1015)* 0-0/RN21F016  
CITIBANK, N. A.  
Account

33  
Statement Period  
Dec 1 - Dec 31, 2012  
Relationship Manager  
Beck, Joseph F  
(954) 958-8549

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### CitiBusiness® ACCOUNT AS OF DECEMBER 31, 2012

#### Relationship Summary:

45

Checking  
Savings  
Checking Plus

### SERVICE CHARGE SUMMARY FROM NOVEMBER 1, 2012 THRU NOVEMBER 30, 2012

Type of Charge	No./Units	Price/Unit	Amount
<b>CITIBUSINESS FLEXIBLE CHECKING #</b>	<b>33</b>		
Average Daily Collected Balance			
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH			
**WAIVE			
CITIBUSINESS ONLINE			
CBOL - OUT. DOMESTIC WIRE TXFR			
**WAIVE			
TRANSFER SERVICES			
INCOMING WIRE TRANSFER			
**WAIVE			
<b>Total Charges for Services</b>			
<b>Net Service Charge</b>			

### CHECKING ACTIVITY

#### CitiBusiness Flexible Checking

33

Beginning Balance:  
Ending Balance:

Date	Description	Debits	Credits	Balance
12/03	CHECK NO: 972			
12/03	CHECK NO: 973			
12/03	CHECK NO: 981			
12/03	CHECK NO: 997			
12/03	CHECK NO: 971			
12/03	CHECK NO: 980			
12/03	CHECK NO: 984			
12/03	CHECK NO: 979			
12/03	CHECK NO: 974			
12/03	CHECK NO: 982			
12/03	CHECK NO: 983			
12/03	CHECK NO: 988			
12/03	CHECK NO: 992			
12/03	CHECK NO: 1002			

NNNN-NNNN-NNNN  
D7261360011360001\*

LITAI ASSETS LLC

Account 83 Page 2 of 22  
Statement Period: Dec 1 - Dec 31, 2012

0-0/R121F016

**CHECKING ACTIVITY**

Continued

Date	Description	Debits	Credits	Balance
12/04	DEBIT CARD D9MP8400 PUBLIC STORAG	000.00		4,004,510.70
12/04	CHECK NO:			
12/04	CHECK NO:			
12/04	CHECK NO:			
12/05	ELECTRONIC PAYCHEX COBRA			
12/05	DEPOSIT			
12/05	TRANSFER TRANSFER TO C VIA CBU SOL			
12/05	CHECK NO:			
12/05	CHECK NO:			
12/05	CHECK NO:			
12/05	CHECK NO:			
12/05	CHECK NO:			
12/05	DEBIT CARD 0H184S00 WWW.NEWEgg.			
12/06	ACH DEBIT PAYX-SDD			
12/06	ACH DEBIT PAYCHEX OGS			
12/06	ACH DEBIT PAYCHEX-INC.			
12/06	CHECK NO:			
12/06	CHECK NO:			
12/06	DEBIT CARD OFFICE DEPOT 00 6325 NOFORT LAUDERDAFLUS0015			
12/07	FUNDS TRANSFER WIRE FROM JAN DE SCHEPPER A VOCAT BVBA Dec 07			612,947.66
12/07	DEBIT T5XM6*00 WWW.NE	000.00		
12/07	DEBIT BPZ7Y21 COMPUT			
12/07	ACH DI GOOGLE			
12/07	ACH DI PAYCHE			
12/07	ACH DI PAYCHE			
12/07	ACH DI PAYCHE			
12/07	ACH DI PAYCHE			
12/07	CHECK			
12/10	ELECT PAYCHE			
12/10	DEBIT FWSJ4F1 DURST FAMLY MEDICINE DOMAIN BEACH FL 12242			
12/10	DEBIT THGD17 21ST SEF			
12/10	CHECK			
12/10	CHECK			
12/10	CHECK			
12/11	FUNDS TRANSFER WIRE FROM JAN DE SCHEPPER A VOCAT BVBA Dec 11			68,400.00
12/11	DEBIT CARD OFFICE I	000.00		
12/12	CHECK			
12/12	DEBIT WAL-MAI			
12/12	DEBIT 1140 SW			
12/13	DEBIT 2TH3KPC VOIP SU			
12/13	ACH D PAYCHE			



CitiBusiness®

Account J83 Page 3 of 22  
 Statement Period: Dec 1 - Dec 31, 2012

0-0/R1/2(F016  
R)**CHECKING ACTIVITY****Continued**

Date	Description	Debits	Credits	Balance
12/13	ACH I PAYCH			
12/13	CHEC			
12/13	CHEC			
12/13	CHEC			
12/13	DEBIT TARGE			
12/14	ACH I PAYCHI			
12/14	ACH I PAYCHI			
12/14	ACH I PAYCHI			
12/14	CHEC			
12/14	DEPO			
12/17	DEBIT 72WPZ8 CHART			
12/17	TRANS TRANSF VIA CBU			
12/17	CHECI			
12/17	DEBIT COSTCC			
12/18	DEBIT V7YPVH BELNICK			
12/18	CHECK			
12/19	ELECT PAYCHE			
12/19	DEBIT 6TKTVN0 WWW.NE			
12/19	DEBIT 4RKTVNC WWW.NE			
12/19	DEBIT 3NKTVNC WWW.NE			
12/19	CHECK			
12/20	DEBIT QXKSPW PUBLIC S			
12/20	TRANS TRANSF VIA CBUS			
12/20	ACH DE PAYCHEX			
12/20	CHECK			
12/21	DEPOS			
12/21	FUNDS TRANSFER WIRE FROM JAN DE SCHEPPER A VOCATA BVBA	474,195.36		
	Dec 21			

D72613650011360002\*

NNNN-NNNN-NNNN-NNNN

LITAI ASSETS LLC

Account

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0-0/R121F016

Statement Period: Dec 1 - Dec 31, 2012

**CHECKING ACTIVITY****Continued**

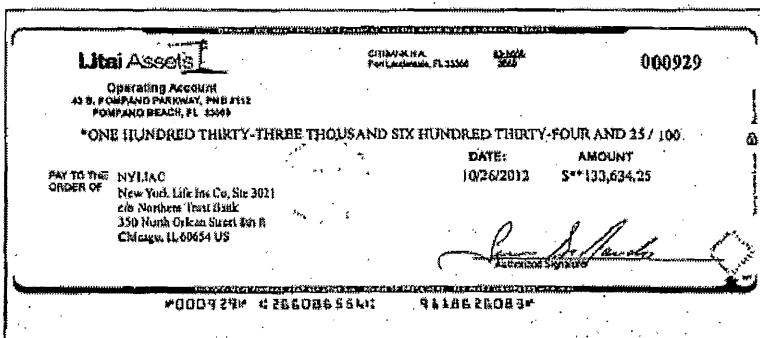
Date	Description	Debits	Credits	Balance
12/21				
12/21				
12/21				
12/21				
12/21				
12/21				
12/21				
12/24				
12/26				
12/26				
12/26				
12/27				
12/27				
12/27	FUNDS TRANSFER WIRE FROM JAN DE SCHEPPER A VOCAT BVBA Dec 27	429,350.00		
12/27	AC PAYMENT			
12/27	AC PAYMENT			
12/27	AC PAYMENT			
12/27	AC IRS			
12/27	CH			
12/27	CH			
12/27	CH			
12/28	AC PAYMENT			
12/28	AC PAYMENT			
12/31	FU WIF			
12/31	AC PAYMENT			
12/31	CH			
	<b>Total Debits/Credits</b>			

Checks Paid											
Check	Date	Amount	Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
971	12/03		972	12/03		973	12/03		974	12/03	255.68
975	12/05					977	12/05		978	12/05	
979	12/03		980	12/03		981	12/03		982	12/03	
983	12/03		984	12/03		986*	12/06	1	988*	12/03	
991*	12/20		992	12/03		995*	12/07		996	12/04	
997	12/03		998	12/04		1001*	12/07	1	1002	12/03	
1003	12/12		1004	12/05		1005	12/04		1006	12/10	
1007	12/07		1008	12/06		1009	12/10		1010	12/13	
1011	12/05		1012	12/07		1013	12/17	1	1014	12/14	
1015	12/14		1016	12/17		1017	12/21	2	1018	12/17	
1019	12/17		1020	12/19		1021	12/19		1022	12/10	
1023	12/17		1024	12/13		1026*	12/13	14	1027	12/14	
1028	12/14		1029	12/14		1030	12/19	2	1031	12/18	
1032	12/17		1033	12/19		1034	12/21		1035	12/18	177
1036	12/18		1037	12/19		1038	12/18		1039	12/19	1
1040	12/19		1042*	12/27		1043	12/31		1046*	12/20	
1047	12/20		1048	12/20		1049	12/20	2	1051*	12/24	
1052	12/21		1053	12/26		1054	12/27	278	1055	12/27	42
1076*	12/31		1077	12/31		1078	12/31		1079	12/31	

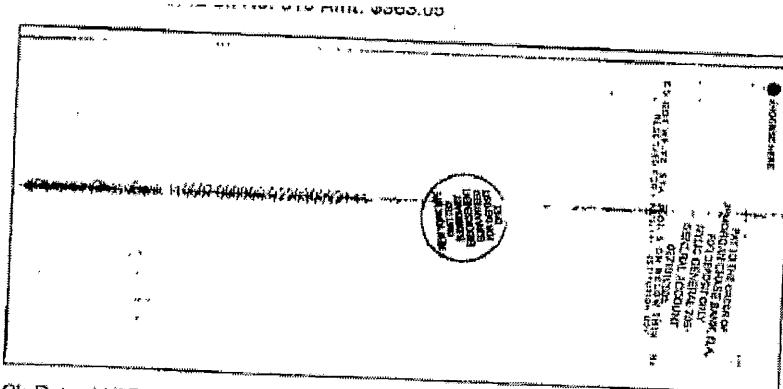
\* indicates gap in check number sequence

Number Checks Paid: 76

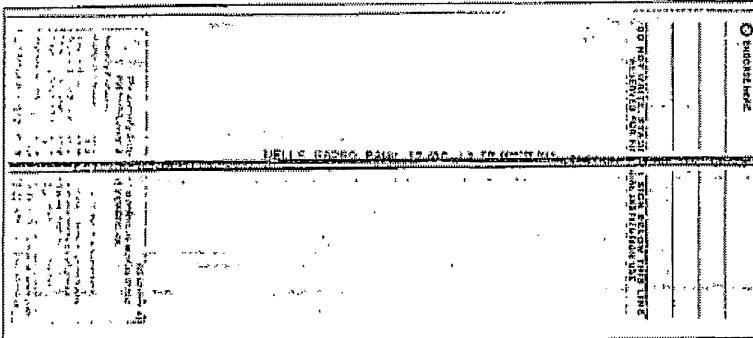
Totaling: \$1,000,770.01



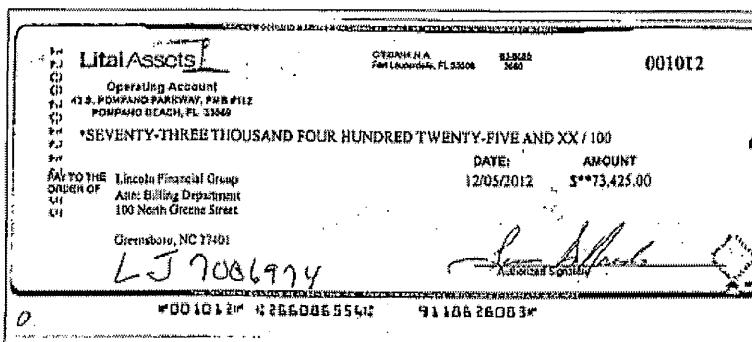
Ck Date: 11/07/2012 Ck No: 929 Amt: \$133634.25



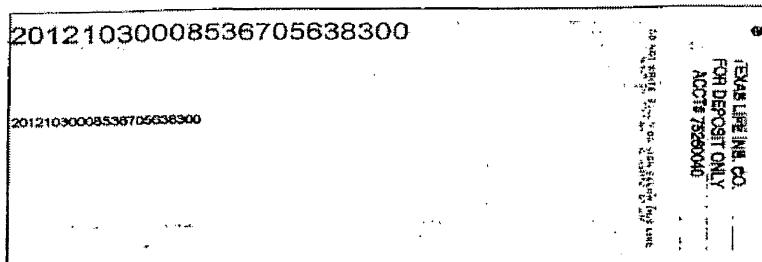
Ck Date: 11/07/2012 Ck No: 929 Amt: \$133634.25



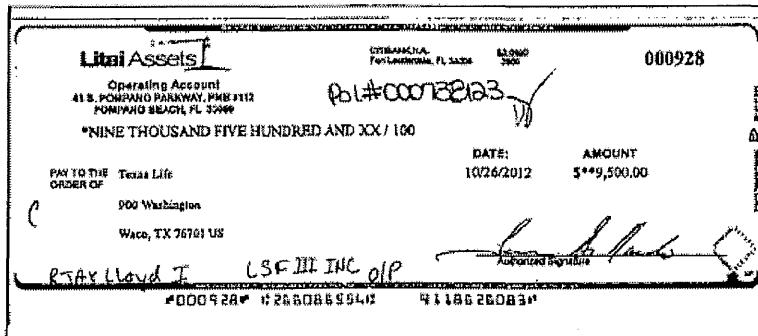
Ck Date: 12/07/2012 Ck No: 1012 Amt: \$73425.00



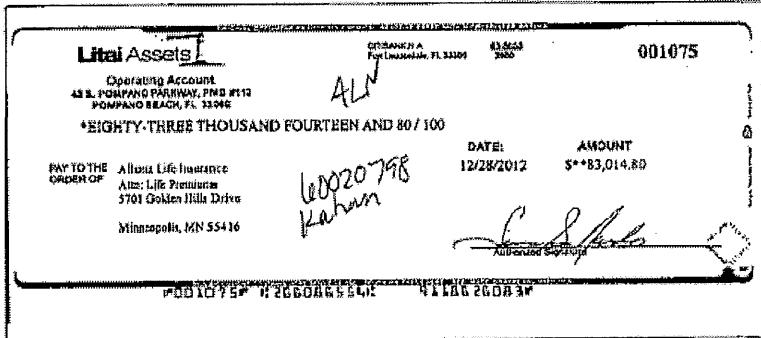
Ck Date: 12/07/2012 Ck No: 1012 Amt: \$73425.00



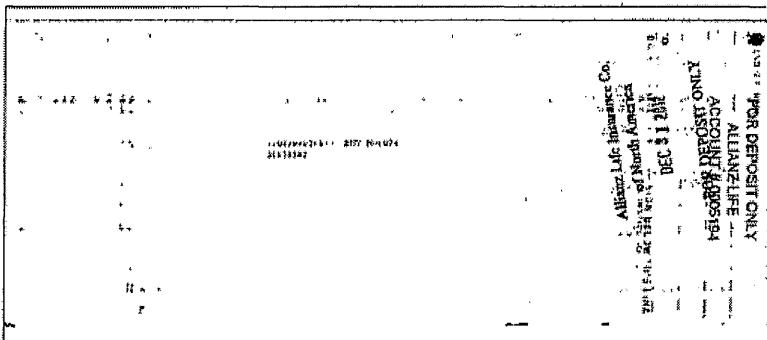
Ck Date: 10/31/2012 Ck No: 928 Amt: \$9500.00



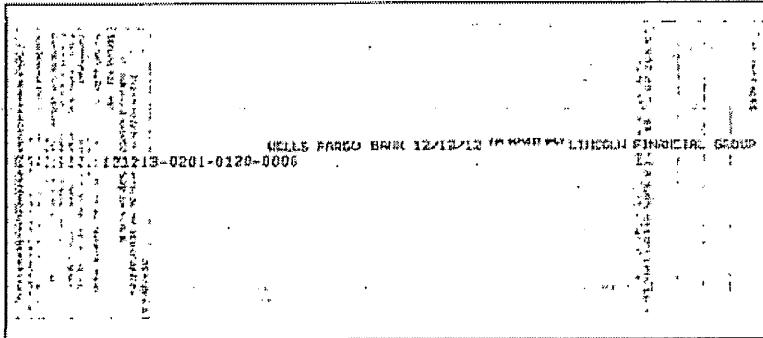
Ck Date: 10/31/2012 Ck No: 928 Amt: \$9500.00



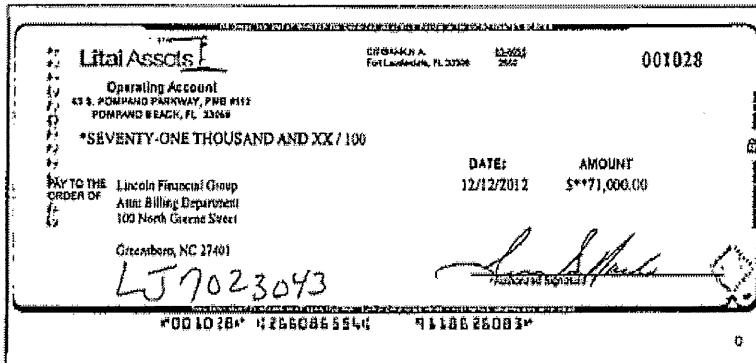
Ck Date: 01/03/2013 Ck No: 1075 Amt: \$83014.80



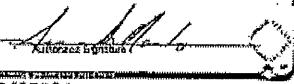
Ck Date: 01/03/2013 Ck No: 1075 Amt: \$83014.80



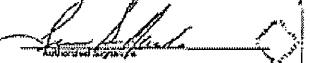
Ck Date: 12/14/2012 Ck No: 1028 Amt: \$71000.00



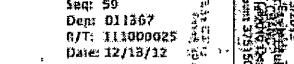
Ck Date: 12/14/2012 Ck No: 1028 Amt: \$71000.00

Lilai Assets		ORLANDO, Pompano Beach, FL 33069	12/14 2012	001027
Operating Account 435, POMPANO PARKWAY, PMB #112 POMPANO BEACH, FL 33069				
\$*SIXTY-THREE THOUSAND FOUR HUNDRED THIRTY-SEVEN AND 16 / 100				
PAY TO THE ORDER OF	AXA Equitable	DATE:	AMOUNT	
	Axa Premium Remittance Dept. 10140 Bldg A/B/C/Centra Plaza Charlotte, NC 28279	12/12/2012	\$**63,437.16	
155-28976 				
#001027# 0288066554# 9118626083#				

Ck Date: 12/14/2012 Ck No: 1027 Amt: \$63437.16

Lilai Assets		ORLANDO, Pompano Beach, FL 33069	12/14 2012	001029
Operating Account 435, POMPANO PARKWAY, PMB #112 POMPANO BEACH, FL 33069				
\$*THIRTY THOUSAND SIX HUNDRED NINETY-THREE AND XX / 100				
PAY TO THE ORDER OF	Tranamerica Life Ins. Co. Attn: Billing & Premium Dept. 4333 Ridgewood Road NE Cedar Rapids, IA 52499	DATE:	AMOUNT	
		12/12/2012	\$**30,693.00	
60138414 				
#001029# 0288066554# 9118626083# 000030693007				

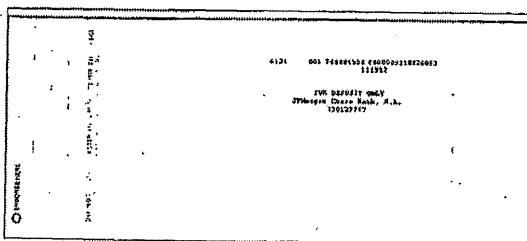
Ck Date: 12/14/2012 Ck No: 1029 Amt: \$30693.00

Lilai Assets		ORLANDO, Pompano Beach, FL 33069	12/14 2012	001027
Operating Account 435, POMPANO PARKWAY, PMB #112 POMPANO BEACH, FL 33069				
\$*SIXTY-THREE THOUSAND FOUR HUNDRED THIRTY-SEVEN AND 16 / 100				
PAY TO THE ORDER OF	AXA Equitable	DATE:	AMOUNT	
	Axa Premium Remittance Dept. 10140 Bldg A/B/C/Centra Plaza Charlotte, NC 28279	12/12/2012	\$**63,437.16	
155-28976 				
#001027# 0288066554# 9118626083#				

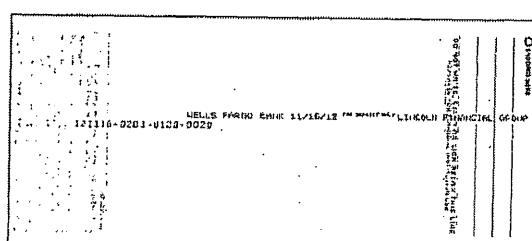
Ck Date: 12/14/2012 Ck No: 1027 Amt: \$63437.16

Lilai Assets		ORLANDO, Pompano Beach, FL 33069	12/14 2012	001029
Operating Account 435, POMPANO PARKWAY, PMB #112 POMPANO BEACH, FL 33069				
\$*THIRTY THOUSAND SIX HUNDRED NINETY-THREE AND XX / 100				
PAY TO THE ORDER OF	Tranamerica Life Ins. Co. Attn: Billing & Premium Dept. 4333 Ridgewood Road NE Cedar Rapids, IA 52499	DATE:	AMOUNT	
		12/12/2012	\$**30,693.00	
60138414 				
#001029# 0288066554# 9118626083#				

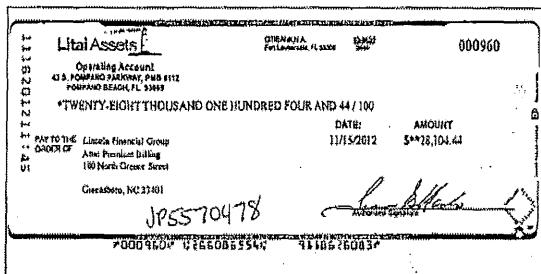
Ck Date: 12/14/2012 Ck No: 1029 Amt: \$30693.00



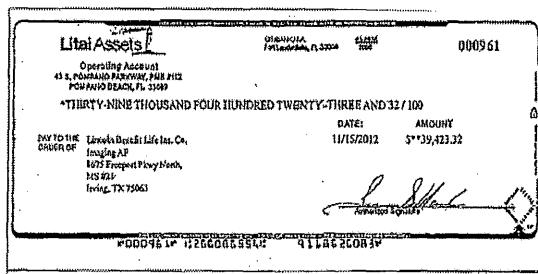
Ck Date: 11/20/2012 Ck No: 961 Amt: \$39423.32



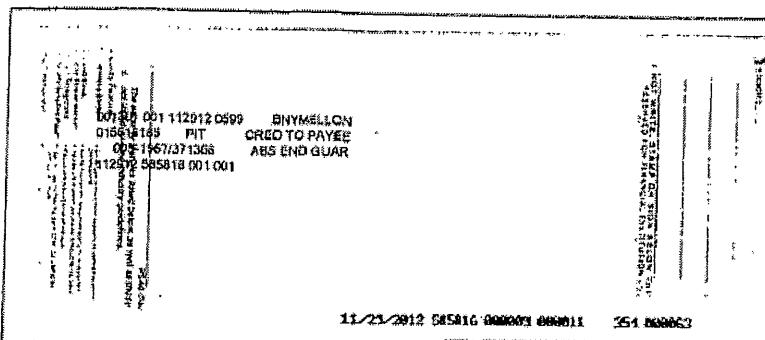
Ck Date: 11/19/2012 Ck No: 960 Amt: \$28104.44



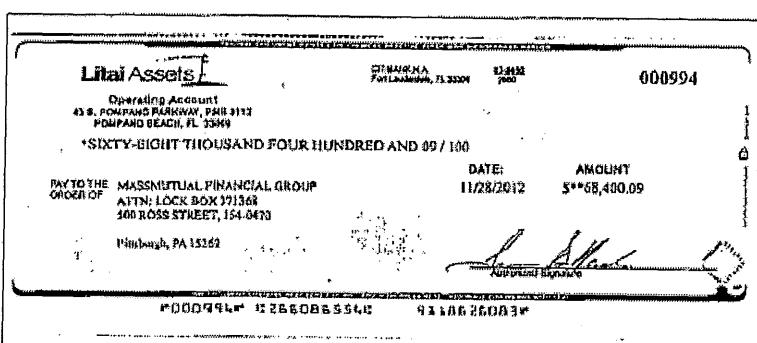
Ck Date: 11/19/2012 Ck No: 960 Amt: \$28104.44



Ck Date: 11/20/2012 Ck No: 961 Amt: \$39423.32



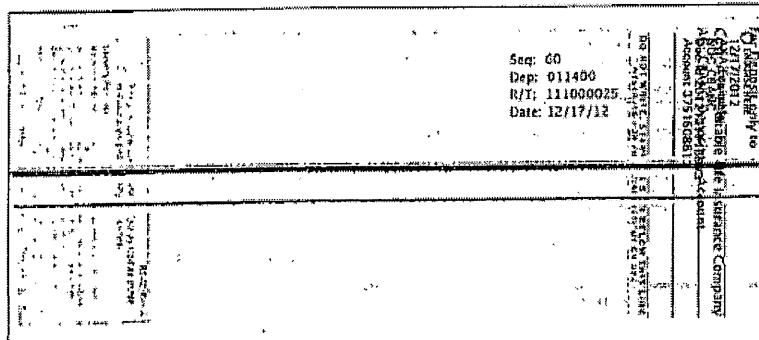
Ck Date: 11/30/2012 Ck No: 994 Amt: \$68400.09



Ck Date: 11/30/2012 Ck No: 994 Amt: \$68400.09

Litai Assets	001031	
Operating Account		
403 S. FORT PIERCE RD #112		
FORT PIERCE, FL 34946		
*SEVENTY-FOUR THOUSAND EIGHT HUNDRED THIRTY-TWO AND 50/100.		
PAY TO THE	DATE:	AMOUNT
ORDER OF AXA Equitable	12/14/2012	\$**74,832.50
Attn: Premium Remittance Dept.		
10440 Biltmore Commons Pkwy		
Charlotte, NC 28277		
<i>157-201-409</i>	<i>James Shultz</i>	<i>Authorized Signature</i>
MOD1031 0266086554C 9118626083*		

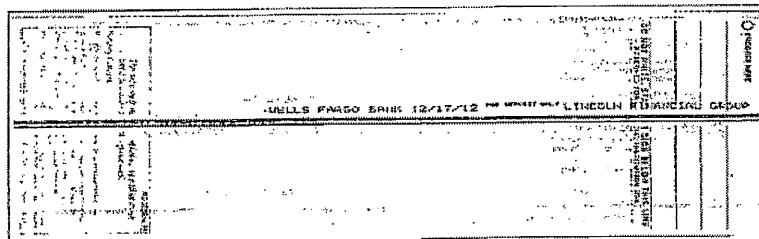
Ck Date: 12/18/2012 Ck No: 1031 Amt: \$74832.50



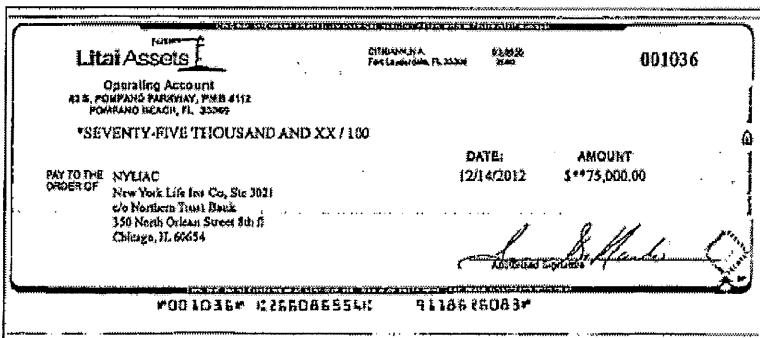
Ck Date: 12/18/2012 Ck No: 1031 Amt: \$74832.50

Litai Assets	001035	
Operating Account		
403 S. FORT PIERCE RD #112		
FORT PIERCE, FL 34946		
*ONE HUNDRED SEVENTY-SEVEN THOUSAND EIGHT HUNDRED THIRTY-THREE AND 07 / 100		
PAY TO THE	DATE:	AMOUNT
ORDER OF Lincoln Financial Group	12/14/2012	\$**177,833.07
Attn: Billing Department		
190 North Grant Street		
Chicago, IL 60601		
<i>JF5516678</i>	<i>James Shultz</i>	<i>Authorized Signature</i>
MOD1035 0266086554C 9118626083*		

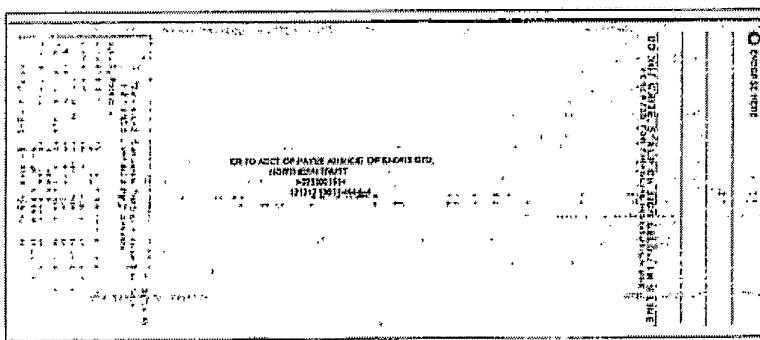
Ck Date: 12/18/2012 Ck No: 1035 Amt: \$177833.07



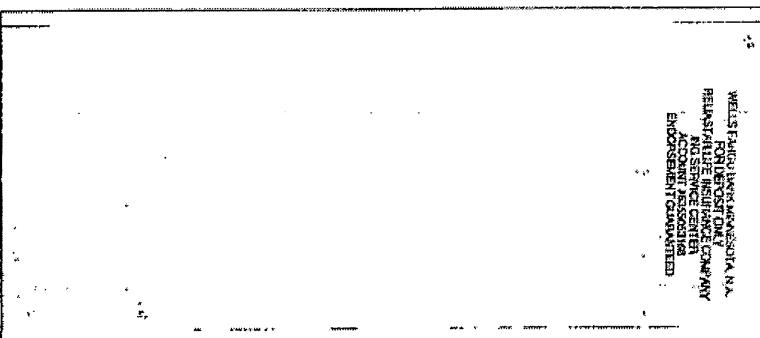
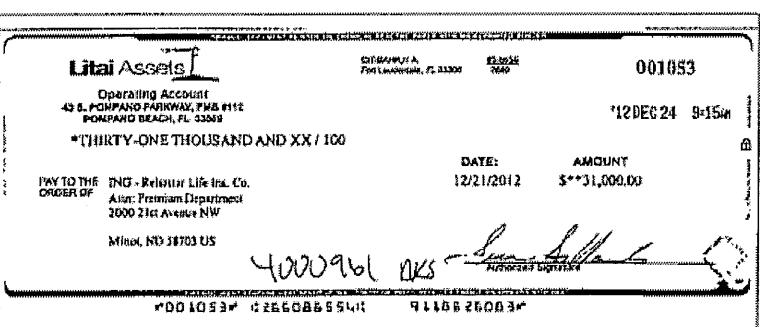
Ck Date: 12/18/2012 Ck No: 1035 Amt: \$177833.07



Ck Date: 12/18/2012 Ck No: 1036 Amt: \$75000.00



Ck Date: 12/18/2012 Ck No: 1036 Amt: \$75000.00



Ck Date: 12/26/2012 Ck No: 1053 Amt: \$31000.00

# **Exhibit “C”**

Citibank CBO Services 124  
 P.O. Box 769018  
 San Antonio, Texas 78245

0-0/R1/20F016

006  
 CITIBANK, N. A.  
**Account**  
**9135616997**

LITAI ASSETS LLC  
 ( QT PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

**Statement Period**  
**Jan 9 - Jan 31, 2013**

Page 1 of 2

### CitiBusiness® ACCOUNT AS OF JANUARY 31, 2013

#### Relationship Summary:

Checking	\$953,434.47
Savings	-----
Checking Plus	-----

When planning your big trip, plan on Citibank World Wallet®, for next business day delivery of foreign currencies to your home, office or nearest branch. (Anywhere in the Continental U.S.). Visit your nearest Branch or Call 1-800-756-7050. Ordering limits/fees apply.

### CHECKING ACTIVITY

#### CitiBusiness Streamlined Checking

			Beginning Balance:	\$0.00	
Date	Description		Debits	Credits	Balance
01/22	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBusOL Re # 030189	Jan 22		836,257.40	836,257.40
01/24	CHECK NO: 1010		37,973.46		798,283.94
01/24	CHECK NO: 1011		41,083.30		757,200.64
01/25	CHECK NO: 1012		82,315.00		674,885.64
01/28	CHECK NO: 1013		89,871.00		585,014.64
01/28	CHECK NO: 1014		89,874.00		495,140.64
01/28	CHECK NO: 1015		119,815.00		375,325.64
01/31	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBusOL Re # 048517	Jan 31		578,108.83	953,434.47
<b>Total Debits/Credits</b>			<b>460,931.76</b>	<b>1,414,366.23</b>	

#### Checks Paid

Check	Date	Amount	Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
1010	01/24	37,973.46	1011	01/24	41,083.30	1012	01/25	82,315.00	1013	01/28	89,871.00
1014	01/28	89,874.00	1015	01/28	119,815.00						

\* indicates gap in check number sequence

Number Checks Paid: 6

Totaling: \$460,931.76

LITAI ASSETS LLC  
(QI PREMIUM ACCOUNT)

Account 9135616997 Page 2 of 2  
Statement Period: Jan 9 - Jan 31, 2013

0-0/R1/20F016

## CUSTOMER SERVICE INFORMATION

### IF YOU HAVE QUESTIONS ON:

Checking

### YOU CAN CALL:

877-528-0990  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

### YOU CAN WRITE:

CitiBusiness  
100 Citibank Drive  
San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

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Citibank CBO Services 124  
 P.O. Box 769018  
 San Antonio, Texas 78245

0-0/R1/20F016

LITAI ASSETS LLC  
 ( QI PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

016  
 CITIBANK, N. A.  
**Account**  
**9135616997**  
**Statement Period**  
**Feb 1 - Feb 28, 2013**  
**Relationship Manager**  
 US SERVICE CENTER  
 1-877-528-0990

Page 1 of 2

**CitiBusiness® ACCOUNT AS OF FEBRUARY 28, 2013****Relationship Summary:**

Checking	\$787,881.23
Savings	-----
Checking Plus	-----

**NOW OPEN!]]**

A New Citibank® Branch at:  
 180 N. Michigan (NEQ Loop)  
 Chicago, IL  
 Citibank, N.A. Member FDIC.

**SERVICE CHARGE SUMMARY FROM JANUARY 9, 2013 THRU JANUARY 31, 2013**

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$284,077.55
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH	6	.3000	1.80
**WAIVE			
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

**CHECKING ACTIVITY****CitiBusiness Streamlined Checking**

Date	Description	Debits	Credits	Balance
02/07	CHECK NO: 1021	68,400.09		885,034.38
02/07	CHECK NO: 1023	71,000.00		814,034.38
02/07	CHECK NO: 1019	73,425.00		740,609.38
02/08	CHECK NO: 1016	4,936.91		735,672.47
02/08	CHECK NO: 1018	5,875.91		729,796.56
02/08	CHECK NO: 1022	50,000.00		679,796.56
02/08	CHECK NO: 1020	56,543.00		623,253.56
02/14	CHECK NO: 1026	28,680.12		594,573.44
02/14	CHECK NO: 1028	75,000.00		519,573.44
02/15	CHECK NO: 1025	40,000.00		479,573.44
02/15	CHECK NO: 1027	40,423.65		439,149.79
02/15	CHECK NO: 1029	51,764.60		387,385.19
02/15	CHECK NO: 1031	83,014.80		304,370.39
02/19	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBuOL Re # 039306		600,000.00	904,370.39
02/19	CHECK NO: 1030	45,630.00		858,740.39
02/19	CHECK NO: 1032	88,575.57		770,164.82
02/19	CHECK NO: 1024	106,470.00		663,694.82

LITAI ASSETS LLC  
( QI PREMIUM ACCOUNT)

Account 9135616997 Page 2 of 2  
Statement Period: Feb 1 - Feb 28, 2013

0-0/R1/20F016

<b>CHECKING ACTIVITY</b>				<b>Continued</b>
<b>Date</b>	<b>Description</b>	<b>Debits</b>	<b>Credits</b>	<b>Balance</b>
02/25	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBusOL Re # 057997	Feb 25	124,186.41	787,881.23
	<b>Total Debits/Credits</b>		<b>889,739.65</b>	<b>724,186.41</b>

<b>Checks Paid</b>											
Check	Date	Amount	Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
1016	02/08	4,936.91	1018*	02/08	5,875.91	1019	02/07	73,425.00	1020	02/08	56,543.00
1021	02/07	68,400.09	1022	02/08	50,000.00	1023	02/07	71,000.00	1024	02/19	106,470.00
1025	02/15	40,000.00	1026	02/14	28,680.12	1027	02/15	40,423.65	1028	02/14	75,000.00
1029	02/15	51,764.60	1030	02/19	45,630.00	1031	02/15	83,014.80	1032	02/19	88,575.57

\* indicates gap in check number sequence

Number Checks Paid: 16 Totaling: \$889,739.65

### **CUSTOMER SERVICE INFORMATION**

IF YOU HAVE QUESTIONS ON:

Checking

YOU CAN CALL:

877-528-0990  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

YOU CAN WRITE:

CitiBusiness  
100 Citibank Drive  
San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

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Citibank CBO Services 124  
 P.O. Box 769018  
 San Antonio, Texas 78245

0-0/R1/20F016

LITAI ASSETS LLC  
 ( QI PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

008  
 CITIBANK, N. A.  
**Account**  
 9135616997  
**Statement Period**  
 Mar 1 - Mar 31, 2013  
**Relationship Manager**  
 Beck, Joseph F  
 (954) 958-8549

Page 1 of 2

**CitiBusiness® ACCOUNT AS OF MARCH 31, 2013****Relationship Summary:**

Checking	\$113,701.38
Savings	-----
Checking Plus	-----

**NOW OPEN!!**

A New Citibank® Branch at:  
 180 N. Michigan (NEQ Loop)  
 Chicago, IL  
 Citibank, N.A. Member FDIC.

**SERVICE CHARGE SUMMARY FROM FEBRUARY 1, 2013 THRU FEBRUARY 28, 2013**

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$681,124.51
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH	16	.3000	4.80
**WAIVE			
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

**CHECKING ACTIVITY****CitiBusiness Streamlined Checking**

Date	Description	Debits	Credits	Balance
9135616997				
				<b>Beginning Balance: \$787,881.23</b>
				<b>Ending Balance: \$113,701.38</b>
03/04	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBUSOL Re # 028620	94,739.17		882,620.40
03/04	Mar 04			
03/07	CHECK NO: 1039	37,973.46		844,646.94
03/07	CHECK NO: 1041	41,083.30		803,563.64
03/07	CHECK NO: 1037	130,737.00		672,826.64
03/07	CHECK NO: 1038	177,250.00		495,576.64
03/13	CHECK NO: 1035	89,871.00		405,705.64
03/13	CHECK NO: 1034	89,874.00		315,831.64
03/13	CHECK NO: 1036	119,815.00		196,016.64
03/28	CHECK NO: 1040	82,315.26		113,701.38
	<b>Total Debits/Credits</b>	<b>768,919.02</b>	<b>94,739.17</b>	

LITAI ASSETS LLC  
( QI PREMIUM ACCOUNT)

Account 9135616997 Page 2 of 2  
Statement Period: Mar 1 - Mar 31, 2013

0-0/R1/20F016

**CHECKING ACTIVITY****Continued**

<b>Checks Paid</b>											
Check	Date	Amount	Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
1034	03/13	89,874.00	1035	03/13	89,871.00	1036	03/13	119,815.00	1037	03/07	130,737.00
1038	03/07	177,250.00	1039	03/07	37,973.46	1040	03/28	82,315.26	1041	03/07	41,083.30

\* indicates gap in check number sequence

Number Checks Paid: 8

Totaling: \$768,919.02

**CUSTOMER SERVICE INFORMATION****IF YOU HAVE QUESTIONS ON:**

Checking

**YOU CAN CALL:**

877-528-0990  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

**YOU CAN WRITE:**

CitiBusiness  
100 Citibank Drive  
San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

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Citibank CBO Services 124  
 P.O. Box 769018  
 San Antonio, Texas 78245

0-0/R1/20F016

LITAI ASSETS LLC  
 ( QI PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

008  
 CITIBANK, N. A.  
**Account**  
 9135616997  
**Statement Period**  
 Apr 1 - Apr 30, 2013  
**Relationship Manager**  
 Beck, Joseph F  
 (954) 958-8549

Page 1 of 2

**CitiBusiness® ACCOUNT AS OF APRIL 30, 2013****Relationship Summary:**

Checking	\$105,591.06
Savings	-----
Checking Plus	-----

**SERVICE CHARGE SUMMARY FROM MARCH 1, 2013 THRU MARCH 31, 2013**

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$367,097.41
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH	8	.3000	2.40
**WAIVE			
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

**CHECKING ACTIVITY****CitiBusiness Streamlined Checking**

			Beginning Balance:	\$113,701.38
Date	Description	Debits	Credits	Balance
04/02	CHECK NO: 1042	36,154.39		77,546.99
04/08	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBUSOL Re # 090924		315,404.33	392,951.32
04/11	CHECK NO: 1045	56,579.44		336,371.88
04/11	CHECK NO: 1048	73,425.00		262,946.88
04/12	CHECK NO: 1050	4,936.91		258,009.97
04/12	CHECK NO: 1047	40,000.00		218,009.97
04/15	CHECK NO: 1049	5,875.91		212,134.06
04/15	CHECK NO: 1043	50,000.00		162,134.06
04/15	CHECK NO: 1044	56,543.00		105,591.06
<b>Total Debits/Credits</b>		<b>323,514.65</b>	<b>315,404.33</b>	

**Checks Paid**

Check	Date	Amount									
1042	04/02	36,154.39	1043	04/15	50,000.00	1044	04/15	56,543.00	1045	04/11	56,579.44
1047*	04/12	40,000.00	1048	04/11	73,425.00	1049	04/15	5,875.91	1050	04/12	4,936.91

\* indicates gap in check number sequence

Number Checks Paid: 8

Totaling: \$323,514.65

LITAI ASSETS LLC  
(QI PREMIUM ACCOUNT)

Account 9135616997  
Statement Period: Apr 1 - Apr 30, 2013

0-0/R1/20F016

## CUSTOMER SERVICE INFORMATION

### IF YOU HAVE QUESTIONS ON:

Checking

### YOU CAN CALL:

877-528-0990  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

### YOU CAN WRITE:

CitiBusiness  
100 Citibank Drive  
San Antonio, TX 78245-9966

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0-0/R1/20F016

LITAI ASSETS LLC  
 ( QT PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

007  
 CITIBANK, N. A.  
**Account**  
**9135616997**  
**Statement Period**  
**May 1 - May 31, 2013**  
**Relationship Manager**  
 Beck, Joseph F  
 (954) 958-8549

Page 1 of 2

### CitiBusiness® ACCOUNT AS OF MAY 31, 2013

#### Relationship Summary:

Checking	\$746,290.35
Savings	-----
Checking Plus	-----

### SUGGESTIONS AND RECOMMENDATIONS

#### Help protect yourself from fraud

Awareness is the key to protecting yourself from fraud. Never provide personal information in response to an unsolicited request by fax, phone, email or mail. Immediately delete suspicious emails without opening them. Always be aware of the source of checks that are deposited to your account. Avoid becoming a victim and protect your information and your accounts. If you have any questions, please call us at 1-800-274-6660. In the NY metro area, call 1-800-627-3999.

### SERVICE CHARGE SUMMARY FROM APRIL 1, 2013 THRU APRIL 30, 2013

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$145,475.70
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH	8	.3000	2.40
**WAIVE			
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

### CHECKING ACTIVITY

#### CitiBusiness Streamlined Checking

Date	Description	Debits	Credits	Balance
05/02	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBusOL Re # 089547	May 02	590,944.24	696,535.30
05/07	CHECK NO: 1051	156,384.40		540,150.90
05/15	CHECK NO: 1054	28,680.12		511,470.78
05/15	CHECK NO: 1059	40,423.65		471,047.13
05/15	CHECK NO: 1056	51,764.60		419,282.53
05/15	CHECK NO: 1053	88,575.57		330,706.96

LITAI ASSETS LLC  
(QI PREMIUM ACCOUNT)

Account 9135616997 Page 2 of 2  
Statement Period: May 1 - May 31, 2013

0-0/R1/20F016

**CHECKING ACTIVITY****Continued**

Date	Description	Debits	Credits	Balance
05/15	CHECK NO: 1052	142,101.00		188,605.96
05/16	CHECK NO: 1057	83,014.80		105,591.16
05/20	TRANSFER DEBIT TRANSFER TO CHECKING VIA CBusOL REFERENCE # 004534 May 20	83,487.22		22,103.94
05/22	TRANSFER CREDIT TRANSFER FROM CHECKING 009118626083 VIA CBusOL Re # 089895 May 22		724,186.41	746,290.35
	<b>Total Debits/Credits</b>	<b>674,431.36</b>	<b>1,315,130.65</b>	

**Checks Paid**

Check	Date	Amount	Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
1051	05/07	156,384.40	1052	05/15	142,101.00	1053	05/15	88,575.57	1054	05/15	28,680.12
1056*	05/15	51,764.60	1057	05/16	83,014.80	1059*	05/15	40,423.65			

\* indicates gap in check number sequence

Number Checks Paid: 7

Totaling: \$590,944.14

**CUSTOMER SERVICE INFORMATION**

IF YOU HAVE QUESTIONS ON:

Checking

YOU CAN CALL:

877-528-0990  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

YOU CAN WRITE:

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0-0/R1/20F016

LITAI ASSETS LLC  
 ( QI PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

010  
 CITIBANK, N. A.  
**Account**  
**9135616997**  
**Statement Period**  
**Jun 1 - Jun 30, 2013**  
**Relationship Manager**  
 Beck,Joseph F  
 (954) 958-8549

Page 1 of 2

**CitiBusiness® ACCOUNT AS OF JUNE 30, 2013****Relationship Summary:**

Checking	\$22,104.20
Savings	-----
Checking Plus	-----

**SERVICE CHARGE SUMMARY FROM MAY 1, 2013 THRU MAY 31, 2013**

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$517,017.95
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH	7	.3000	2.10
**WAIVE			
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

**CHECKING ACTIVITY****CitiBusiness Streamlined Checking**

			Beginning Balance:	\$746,290.35
Date	Description	Debits	Credits	Balance
06/12	CHECK NO: 1070	37,973.46		708,316.89
06/12	CHECK NO: 1065	41,083.30		667,233.59
06/12	CHECK NO: 1061	45,630.00		621,603.59
06/12	CHECK NO: 1060	75,000.00		546,603.59
06/12	CHECK NO: 1062	106,470.00		440,133.59
06/13	CHECK NO: 1068	82,315.00		357,818.59
06/14	CHECK NO: 1066	36,154.39		321,664.20
06/14	CHECK NO: 1069	89,871.00		231,793.20
06/14	CHECK NO: 1067	89,874.00		141,919.20
06/14	CHECK NO: 1063	119,815.00		22,104.20
<b>Total Debits/Credits</b>		<b>724,186.15</b>		<b>0.00</b>

**Checks Paid**

Check	Date	Amount	Check	Date	Amount	Check	Date	Amount	Check	Date	Amount
1060	06/12	75,000.00	1061	06/12	45,630.00	1062	06/12	106,470.00	1063	06/14	119,815.00
1065*	06/12	41,083.30	1066	06/14	36,154.39	1067	06/14	89,874.00	1068	06/13	82,315.00
1069	06/14	89,871.00	1070	06/12	37,973.46						

\* indicates gap in check number sequence

Number Checks Paid: 10

Totaling: \$724,186.15

LITAI ASSETS LLC  
( QI PREMIUM ACCOUNT)

Account 9135616997 Page 2 of 2  
Statement Period: Jun 1 - Jun 30, 2013

0-0/R1/20F016

## CUSTOMER SERVICE INFORMATION

### IF YOU HAVE QUESTIONS ON:

Checking

### YOU CAN CALL:

877-528-0990  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

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0-0/R1/04F016

LITAI ASSETS LLC  
 ( QI PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

000  
 CITIBANK, N. A.  
**Account**  
 9135616997  
**Statement Period**  
 Jul 1 - Jul 31, 2013  
**Relationship Manager**  
 Beck, Joseph F  
 (954) 958-8549

Page 1 of 1

**CitiBusiness® ACCOUNT AS OF JULY 31, 2013****Relationship Summary:**

Checking	\$22,104.20
Savings	-----
Checking Plus	-----

**SERVICE CHARGE SUMMARY FROM JUNE 1, 2013 THRU JUNE 30, 2013**

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$312,763.91
DEPOSIT SERVICES			
CHECKS, DEP ITEMS/TICKETS, ACH	10	.3000	3.00
**WAIVE			
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

**CHECKING ACTIVITY**

CitiBusiness Streamlined Checking	Beginning Balance:	\$22,104.20
9135616997	Ending Balance:	\$22,104.20

**CUSTOMER SERVICE INFORMATION**

IF YOU HAVE QUESTIONS ON:

Checking

YOU CAN CALL:

877-528-0990  
 (For Speech and Hearing  
 Impaired Customers Only  
 TDD: 800-945-0258)

YOU CAN WRITE:

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 San Antonio, TX 78245-9966

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 San Antonio, Texas 78245

001/R1/20F016

LITAI ASSETS LLC  
 ( QI PREMIUM ACCOUNT)  
 1180 SW 36TH AVE SUITE 207  
 POMPANO BEACH FL 33069

001  
 CITIBANK, N. A.  
**Account**  
 9135616997  
**Statement Period**  
 Aug 1 - Aug 31, 2013  
**Relationship Manager**  
 Beck, Joseph F  
 (954) 958-8549

Page 1 of 1

**CitiBusiness® ACCOUNT AS OF AUGUST 31, 2013****Relationship Summary:**

Checking	\$13,749.74
Savings	-----
Checking Plus	-----

**SERVICE CHARGE SUMMARY FROM JULY 1, 2013 THRU JULY 31, 2013**

Type of Charge	No./Units	Price/Unit	Amount
<b>STREAMLINED CHECKING # 9135616997</b>			
Average Daily Collected Balance			\$22,104.20
<b>Total Charges for Services</b>			<b>\$0.00</b>
<b>Net Service Charge</b>			<b>\$0.00</b>

**CHECKING ACTIVITY**

CitiBusiness Checking		Beginning Balance:	\$22,104.20
9135616997		Ending Balance:	\$13,749.74
Date	Description	Debits	Credits
08/28	CHECK NO: 1072	8,354.46	13,749.74

**CUSTOMER SERVICE INFORMATION**

## IF YOU HAVE QUESTIONS ON:

Checking

## YOU CAN CALL:

877-528-0990  
 (For Speech and Hearing  
 Impaired Customers Only  
 TDD: 800-945-0258)

## YOU CAN WRITE:

CitiBusiness  
 100 Citibank Drive  
 San Antonio, TX 78245-9966

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# **Exhibit “D”**

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000220-IN****INVOICE DATE: 01/31/13**

Deborah C. Menotte, Trustee

Customer No.: QI

P.O. Box 211087  
West Palm Beach, FL 33421 US

Terms: Due upon receipt

Email Address:

DESCRIPTION	AMOUNT
Serv Fee Oct 26 to Nov 30, '12	40,590.00
Christina Cabrera 120.35hrs @ \$175/Hr	
Nicola Stazzone 26.80hrs @ \$175/Hr	
Tyrone Philpart 52.95hrs @ \$225/Hr	
Oral Beason 10hrs @ \$225/Hr	
Susan DiNardo 3hrs @ \$225/hr	

NET INVOICE: 40,590.00

SALES TAX: 0.00

INVOICE TOTAL: 40,590.00

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000221-IN****INVOICE DATE: 01/31/13**

Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421 US

Customer No.: QI

Terms: Due upon receipt  
Email Address:

DESCRIPTION	AMOUNT
Servicing Fees 12/1-12/21 2012	22,337.50
Christina Cabrera 62hrs @ \$175/Hr	
Nicola Stazzone 2hrs @ \$175/Hr	
Tyrone Philpart 28.5hrs @ \$225/Hr	
Oral Beason 11hrs @ \$225/Hr	
Susan DiNardo 2hrs @ \$225/Hr	
Jan-Eric Samuel 6hrs @ \$300/Hr	
Federal Express Charges	146.66

NET INVOICE: 22,484.16

SALES TAX: 0.00

**INVOICE TOTAL: 22,484.16**

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000222-IN****INVOICE DATE: 01/31/13**

Deborah C. Menotte, Trustee

Customer No.: QI

P.O. Box 211087  
West Palm Beach, FL 33421 US

Terms: Due upon receipt

Email Address:

DESCRIPTION	AMOUNT
Servicing Fee 01/01-01/31 2013	15,837.50
Christina Cabrera 54.5hrs @ \$175/Hr	
Tyrone Philpart 14.5hrs @ \$225/Hr	
Oral Beason 8hrs @ \$225/Hr	
Susan DiNardo 1.5hrs @ \$225/Hr	
Jan-Eric Samuel 3hrs @ \$300/Hr	
Federal Express Charges	60.11

NET INVOICE: 15,897.61

SALES TAX: 0.00

INVOICE TOTAL: 15,897.61



# INVOICE

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000225-IN**

**INVOICE DATE: 02/28/13**

Deborah C. Menotte, Trustee

Customer No.: QI

P.O. Box 211087  
 West Palm Beach, FL 33421 US

Terms: Due upon receipt

Email Address:

DESCRIPTION	AMOUNT
Servicing Fee for Feb 01-28	1,979.25
25 Active Policies at \$79.17pp	334.75
Federal Express Charges	

NET INVOICE: 2,314.00

SALES TAX: 0.00

INVOICE TOTAL: 2,314.00

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000238-IN****INVOICE DATE: 03/31/13**

Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421 US

Customer No.: QI

Terms: Due upon receipt  
Email Address:

DESCRIPTION	AMOUNT
Servicing fees for Mar 01-31	
25 Active Policies at \$79.17pp	1,979.25
Federal Express Charges	222.20

NET INVOICE: 2,201.45  
SALES TAX: 0.00  
INVOICE TOTAL: 2,201.45

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000239-IN****INVOICE DATE: 04/30/13**

Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421 US

Customer No.: QI

Terms: Due upon receipt  
Email Address:

DESCRIPTION	AMOUNT
Servicing Fee for Apr 01-30	
25 Active Policies at \$79.17pp	1,979.25
Federal Express Charges	126.24

NET INVOICE: 2,105.49  
SALES TAX: 0.00  
INVOICE TOTAL: 2,105.49

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000265-IN****INVOICE DATE: 05/31/13**

Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421 US

Customer No.: QI

Terms: Due upon receipt  
Email Address:

DESCRIPTION	AMOUNT
Servicing Fees from 05/01-05/31	
25 Active Policies @ \$79.17/PP	1,979.25
Federal Express Charges	124.53

NET INVOICE: 2,103.78  
SALES TAX: 0.00  
INVOICE TOTAL: 2,103.78

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000266-IN****INVOICE DATE: 06/30/13**

Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421 US

Customer No.: QI

Terms: Due upon receipt  
Email Address:

DESCRIPTION	AMOUNT
Servicing Fees for 06/01-06/30	
25 Active Policies @ \$79.17/PP	1,979.25
6 Federal Express Charges	186.69

NET INVOICE: 2,165.94  
SALES TAX: 0.00  
INVOICE TOTAL: 2,165.94

**INVOICE**

**Litai Assets LLC**  
**43 South Pompano Pkwy #112**  
**Pompano Beach, FL 33069**  
**(954) 582-0200**

**INVOICE NUMBER: 0000267-IN****INVOICE DATE: 07/31/13**

Deborah C. Menotte, Trustee

Customer No.: QI

P.O. Box 211087  
West Palm Beach, FL 33421 US

Terms: Due upon receipt

Email Address:

DESCRIPTION	AMOUNT
Servicing Fees for 07/01-07/31 25 Active Policies @ \$79.17/PP	1,979.25

NET INVOICE:	1,979.25
SALES TAX:	0.00
<b>INVOICE TOTAL:</b>	<b>1,979.25</b>

*Invoice*

To Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421

Invoice Number: 0000273-IN  
Invoice Date: 8/19/2013  
Customer Number: QI

Customer P.O.:

Terms: Due upon receipt

Description	Amount
Optional Services	1,603.80
CLSF XXVI - Anderson Ruth	
Optional Services	250.00
CLSF XXXVIII	
Optional Services	1,035.75
CLSF XXXV - Brody Vera	
Optional Services	2,220.80
CLSF XII - Darmanyan Feyga	
Optional Services	1,495.86
CLSF XIV - Gelb Margaret	
Optional Services	1,659.03
CLSF XVII - Grimes Bartlett T.	
Optional Services	1,245.04
BGIF 6 - Grunwald Ilse	
Optional Services	396.05
CLSF I - Harrison Arthur M.	
Optional Services	1,605.52
CLSF III/IV - Herskowitz Robert	
Optional Services	1,650.46
LSF VI - Huffman Jean	
Optional Services	576.04
BGIF 24 - Joher Hassan	
Optional Services	1,602.20
CLSF XXXI - Kahan Edith	
Optional Services	549.28
LIP Leifer Trust - Leifer Flora	
Optional Services	525.93
LSF III - Lloyd Rjay	
Optional Services	1,453.56
CLSF XLII-A Lundvall Martin L.	
Optional Services	518.41
CLSF XVII - McDonnell Edward	
Optional Services	1,634.52
CLSF VII - Rose Arthur	
Optional Services	1,880.61
BGIF 14 - Ryan Maria L.	
Optional Services	549.28
BGIF 18,19/CLSF XL - Sabato Emilia	
Optional Services	300.57

Continued

*Invoice*

To Deborah C. Menotte, Trustee  
 P.O. Box 211087  
 West Palm Beach, FL 33421

Invoice Number: 0000273-IN

Invoice Date: 8/19/2013

Customer Number: QI

Customer P.O.:

Terms: Due upon receipt

Description	Amount
BGI 17, BGIF 17 - Schwartz Edward Optional Services	550.78
CLSF IX - Spitaleri Vernon R. Optional Services	746.20
BGIF 22 - Teichman Mates	
Make all checks payable to Litai Assets LLC 43 South Pompano Pkwy #112 Pompano Beach, FL 33069 (954) 582-0200	Net Invoice: 24,049.69 Sales Tax: 0.00 Invoice Total: 24,049.69

*Invoice*

To Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421

Invoice Number: 0000274-IN  
Invoice Date: 8/19/2013  
Customer Number: QI

Customer P.O.: \_\_\_\_\_

Terms: Due upon receipt

Description	Amount
Optional Services Hamilton John S.	1,217.05
Optional Services Gluck Morris	538.41
Optional Services Sinder Rita	298.20
Make all checks payable to Litai Assets LLC 43 South Pompano Pkwy #112 Pompano Beach, FL 33069 (954) 582-0200	
Net Invoice: 2,053.66 Sales Tax: 0.00 Invoice Total: 2,053.66	

*Invoice*

To Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421

Invoice Number: 0000276-IN

Invoice Date: 8/31/2013

Customer Number: QI

Customer P.O.:

Terms: Due upon receipt

Description	Amount
Optional Services	1,979.25
Monthly Service Fee for 25 Active Policies	
Optional Services	9,231.77
Verification of Policy Status, Values, lapse basis	
Optional Services	450.00
Verification of Policy Status, Values, lapse basis	



*Invoice*

To Deborah C. Menotte, Trustee  
P.O. Box 211087  
West Palm Beach, FL 33421

Invoice Number: 0000315-IN

Invoice Date: 11/4/2013

Customer Number: QI

Customer P.O.:

Terms: Due upon receipt

Description	Quantity	Price	Amount
Servicing Fees for 10/01-10/23 Pro-rated monthly fee	25	58.74	1,468.50
Make all checks payable to Litai Assets LLC 43 South Pompano Pkwy #112 Pompano Beach, FL 33069 (954) 582-0200		Net Invoice: Sales Tax: Invoice Total:	1,468.50 0.00 1,468.50