IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: WOODBRIDGE GROUP OF COMPANIES, LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 17-12560 (KJC) (Jointly Administered)
WOODBRIDGE GROUP OF COMPANIES, LLC; WOODBRIDGE STRUCTURED FUNDING, LLC, Plaintiffs, vs. CLAUDE G. COSSU, Defendant.	Adversary Proceeding Case No. 18-_____ (KJC)

COMPLAINT OBJECTING TO CLAIM AND COUNTERCLAIMING FOR AVOIDANCE AND RECOVERY OF AVOIDABLE TRANSFERS AND FOR EQUITABLE SUBORDINATION

[1] The last four digits of Woodbridge Group of Companies, LLC's federal tax identification number are 3603. The mailing address for Woodbridge Group of Companies, LLC is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423. Due to the large number of debtors in these cases, which are being jointly administered for procedural purposes only, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of this information may be obtained on the website of the Debtors' noticing and claims agent at www.gardencitygroup.com/cases/WGC, or by contacting the undersigned counsel for the Debtors.

The Woodbridge Group of Companies, LLC and Woodbridge Structured Funding, LLC, debtors and debtors in possession ("Plaintiffs") hereby allege for their Complaint as follows:

NATURE OF THE ACTION

1. At least since August 2012 until shortly before they sought bankruptcy protection, the Plaintiffs and their many hundreds of debtor affiliates (collectively with Plaintiffs, the "Debtors") were operated by their founder and principal, Robert Shapiro ("Shapiro"), as a Ponzi scheme. As part of this fraud, Shapiro utilized the Debtors to raise over one billion dollars from approximately 10,000 investors as either Noteholders or Unitholders (collectively, "Investors").

2. Those Investors often placed a substantial percentage of their net worth (including savings and retirement accounts) with the Debtors and now stand to lose a significant portion of their investments and to be delayed in the return of the remaining portion. The quality of the Investors' lives will likely be substantially and adversely affected by the fraud perpetrated by Shapiro.

3. Investors were often told that they were investing money to be loaned with respect to particular properties owned by third parties, that those properties were worth substantially more than the loans against the properties, and that they would have the benefit of a stream of payments from these third parties for high-interest loans, protected by security interests and/or mortgages against such properties. In reality, these statements were lies. Investors' money was almost never used to make high-interest loans to unrelated, third-party borrowers, there was no stream of payments, Investors' money was commingled and used for an assortment of expenses, including maintaining a lavish lifestyle for Shapiro and his family, brokers' commissions, overhead (largely for selling even more notes and units to investors), and payment

of principal and interest to existing investors. The money that was used to acquire property (almost always owned by a disguised affiliate) cannot be traced to any specific Investor. These are typical characteristics of Ponzi schemes.

4. Because the Debtors operated as a Ponzi scheme, obtaining new money from Investors into the Ponzi scheme conferred no net benefit on the Debtors; on the contrary, each new investment was a net negative. Money was siphoned off to pay the expenses described above, so that the Debtors actually received only a fraction of the investment dollars. New money also perpetuated the Ponzi scheme, enabling the Debtors to return fictitious profits to early Investors; in the absence of new investment, the house of cards would fall (as it eventually did). At the same time, each investment created an obligation to return to the defrauded Investor 100% of the investment, such that each new investment increased the Debtors' liabilities and ultimately left them unable to satisfy their aggregate liabilities.

5. The purpose of this lawsuit is (i) to object to the Claim (defined below) so that Claimant (defined below) is not further compensated at the expense of legitimate creditors for activities that advanced the Ponzi scheme and further drove the Debtors into insolvency, (ii) to recover monies previously paid to Claimant by reason of these activities, and, (iii) to the extent the Claim, or any new or amended claims, survive, to equitably subordinate them.

JURISDICTION AND VENUE

6. The Court has jurisdiction over this action under 28 U.S.C. §§ 157(a) and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012. This adversary proceeding is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(B), (C), (F), and (H). In any event,

Plaintiffs consent to entry of final orders or judgment by the bankruptcy court. Venue of this adversary proceeding is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

GENERAL BACKGROUND

7. On December 4, 2017 (the "Petition Date"), Plaintiffs commenced voluntary cases under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"). Other of the Debtors also filed voluntary chapter 11 cases either on the Petition Date or within the following four months (collectively with Plaintiffs' cases, the "Bankruptcy Cases").

8. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No trustee or examiner has been appointed in these cases.

9. These cases are being jointly administered for procedural purposes pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

FACTUAL ALLEGATIONS COMMON TO ALL CLAIMS

10. Claude G. Cossu ("Claimant") has filed the following claim in one or more of the Bankruptcy Cases:

a. Claim No. 7739 for $7,245.83, which amends Claim No. 2395 (together, Claim Nos. 7739 and 2395 are referred to as the "Claim"). Claimant asserts that the Claim is entitled to priority under Bankruptcy Code section 507(a)(4).

11. Plaintiffs are informed and believe that Claimant seeks recovery on the Claim based upon Claimant's activities that generated investments in the Debtors. In particular,

Claimant was an external broker (*i.e.*, not an employee of the Debtors) who marketed Notes and/or Units to potential Investors.

12. Plaintiffs are informed and believe and thereupon allege that within the 90 days preceding the Petition Date, Claimant received transfers totaling not less than $41,575.00, or more according to proof (the "90 Day Transfers"). The precise transfers – including the transferor, its petition date, the date of each transfer, and the amount of each transfer – are set forth on Exhibit 1.

13. Plaintiffs are informed and believe and thereupon allege that within the two years preceding the Petition Date, Claimant received transfers totaling not less than $159,987.50, or more according to proof (the "Two Year Transfers"). The precise transfers – including the transferor, its petition date, the date of each transfer, and the amount of each transfer – are set forth on Exhibit 2. The Two Year Transfers are inclusive of the 90 Day Transfers, but Plaintiffs do not seek to recover the same sum more than once.

14. Plaintiffs are informed and believe and thereupon allege that within the four years preceding the Petition Date, Claimant received transfers totaling not less than $240,470.43, or more according to proof (the "Four Year Day Transfers"). The precise transfers – including the transferor, its petition date, the date of each transfer, and the amount of each transfer – are set forth on Exhibit 3. The Four Year Transfers are inclusive of the Two Year Transfers and the 90 Day Transfers, but Plaintiffs do not seek to recover the same sum more than once.

FIRST CLAIM FOR RELIEF

Objection to Claims

15. Plaintiffs reallege and incorporate herein Paragraphs 1 through 14, as if fully set forth herein.

16. Plaintiffs' obligations, if any, to honor and/or satisfy the Claim are unenforceable and/or avoidable for multiple reasons, as set forth below in paragraphs 17 through 20, including subparts thereof. Any of the reasons set forth in said paragraphs, including subparts thereof, is individually a basis for disallowance of the Claim.

17. Without shifting the burdens of proof or persuasion, which remain on Claimant, Plaintiffs are informed and believe and thereupon allege that their obligation, if any, to honor and satisfy the Claim is unenforceable, in whole or in part, under applicable nonbankruptcy law (other than because the Claim is contingent or unmatured); thus, the Claim is not allowable under Bankruptcy Code section 502(b)(1). The nonbankruptcy law deficiencies include, without limitation, the following:

a. There was no agreement for paying commissions; and/or

b. Claimant was not properly licensed to sell securities; and/or

c. Any payment of commissions would constitute unjust enrichment; and/or

d. Any obligation to compensate Claimant for activities that perpetuated a fraud is contrary to public policy; and/or

e. Recovery is barred by the doctrines of in pari delicto and/or unclean hands; and/or

f. Claim Nos. 2395 and 7739 are duplicative of each other and Claimant is not entitled to more than one recovery.

18. Plaintiffs' obligations, if any, to honor and satisfy the Claim were incurred in a manner which is avoidable under Bankruptcy Code section 548 because:

a. The obligations were incurred by the Plaintiffs with actual intent to hinder or delay or defraud their creditors insofar as the services to be provided in exchange for such obligations would perpetuate a Ponzi scheme; and/or

b. The obligations were incurred by the Plaintiffs for less than reasonably equivalent value at a time when the Plaintiffs were insolvent; and/or

c. The obligations were incurred by the Plaintiffs for less than reasonably equivalent value at a time when the Plaintiffs were engaged or about to engage in business or a transaction for which any capital remaining with the Plaintiffs was an unreasonably small capital; and/or

d. The obligations were incurred by the Plaintiffs for less than reasonably equivalent value at a time when the Plaintiffs intended to incur, or believed that they would incur, debts beyond their ability to pay as such debts matured.

19. The Claim is, therefore, premised entirely on avoidable obligations under Bankruptcy Code section 548(a) and not allowable.

20. The Claim is further not allowable because:

a. Claimant has received property, including one or more of the 90 Day Transfers, the Two Year Transfers or the Four Year Transfers, recoverable under Bankruptcy Code section 550; and/or

b. Claimant has received a transfer, including one or more of the 90 Day Transfers, the Two Year Transfers or the Four Year Transfers, avoidable under Bankruptcy Code section 544 or section 547 or section 548.

In either event, the Claim must be disallowed under Bankruptcy Code section 502(d).

SECOND CLAIM FOR RELIEF

Avoidance and Recovery of Preferential Transfers

21. Plaintiffs reallege and incorporate herein Paragraphs 1 through 12, as if fully set forth herein.

22. The 90 Day Transfers constituted transfers of the Plaintiffs' property.

23. The 90 Day Transfers were made to or for the benefit of Claimant on account of an antecedent debt and while the Plaintiffs were insolvent. The affirmative assertion that the Plaintiffs were insolvent at the time(s) of the 90 Day Transfers is not intended and does not shift the burden of proof or alter the presumption of insolvency provided by Bankruptcy Code section 547(f).

24. By virtue of the 90 Day Transfers, Claimant received more than Claimant would have received if the 90 Day Transfers had not been made and Claimant received a distribution pursuant to a chapter 7 liquidation.

25. As a result of the foregoing, Plaintiffs are entitled to judgment pursuant to Bankruptcy Code sections 547(b), 550(a), and 551: (a) avoiding the 90 Day Transfers free and clear of any interest of Claimant, (b) directing that the 90 Day Transfers be set aside, and (c) recovering the 90 Day Transfers or the value thereof from Claimant for the benefit of the estates of the Plaintiffs.

THIRD CLAIM FOR RELIEF

Avoidance and Recovery of Actual Intent Fraudulent Transfers – Bankruptcy Code

26. Plaintiffs reallege and incorporate herein Paragraphs 1 through 13, as if fully set forth herein.

27. The Two Year Transfers constituted transfers of the Plaintiffs' property.

28. The Two Year Transfers were made by the Plaintiffs with actual intent to hinder or delay or defraud their creditors insofar as the services to be provided in exchange for such transfers would perpetuate a Ponzi scheme.

29. The Two Year Transfers were made to or for the benefit of Claimant.

30. As a result of the foregoing, the Plaintiffs are entitled to judgment pursuant to Bankruptcy Code sections 548(a), 550(a), and 551: (a) avoiding the Two Year Transfers free and clear of any claimed interest of Claimant, (b) directing that the Two Year Transfers be set aside, and (c) recovering such Two Year Transfers or the value thereof from Claimant for the benefit of the estates of the Plaintiffs.

FOURTH CLAIM FOR RELIEF

Avoidance and Recovery of Constructive Fraudulent Transfers – Bankruptcy Code

31. Plaintiffs reallege and incorporate herein Paragraphs 1 through 13, as if fully set forth herein.

32. The Two Year Transfers constituted transfers of the Plaintiffs' property.

33. The Two Year Transfers were made by the Plaintiffs for less than reasonably equivalent value at a time when the Plaintiffs (i) were insolvent; and/or (ii) were engaged or about to engage in business or a transaction for which any capital remaining with the Plaintiffs

was an unreasonably small capital; and/or (iii) intended to incur, or believed that Plaintiffs would incur, debts beyond their ability to pay as such debts matured.

34. The Two Year Transfers were made to or for the benefit of Claimant.

35. As a result of the foregoing, the Plaintiffs are entitled to judgment pursuant to Bankruptcy Code sections 548(a), 550(a), and 551: (a) avoiding the Two Year Transfers free and clear of any claimed interest of Claimant, (b) directing that the Two Year Transfers be set aside, and (c) recovering such Two Year Transfers or the value thereof from Claimant for the benefit of the estates of the Plaintiffs.

FIFTH CLAIM FOR RELIEF

Avoidance and Recovery of Actual Intent Voidable Transactions – State Law

36. Plaintiffs reallege and incorporate herein Paragraphs 1 through 14, as if fully set forth herein.

37. The Four Year Transfers constituted transfers of the Plaintiffs' property.

38. The Four Year Transfers were made by the Plaintiffs with actual intent to hinder or delay or defraud their creditors insofar as the services to be provided in exchange for such transfers would perpetuate a Ponzi scheme.

39. The Four Year Transfers were made to or for the benefit of Claimant.

40. Plaintiffs that made one or more of the Four Year Transfers have at least one creditor with an allowable unsecured claim for liabilities, which claim remained unsatisfied as of the Petition Date.

41. The Four Year Transfers are avoidable under applicable law – California Civil Code section 3439.04(a)(1) and/or comparable provisions of law in other jurisdictions that have adopted the Uniform Voidable Transactions Act, the Uniform Fraudulent Transfer Act or the

Uniform Fraudulent Conveyance Act – by a creditor holding an allowed unsecured claim and thus by the Plaintiffs pursuant to Bankruptcy Code section 544(b).

42. As a result of the foregoing, the Plaintiffs are entitled to judgment pursuant to Bankruptcy Code sections 544(b), 550(a), and 551: (a) avoiding the Four Year Transfers free and clear of any claimed interest of Claimant, (b) directing that the Four Year Transfers be set aside, and (c) recovering such Four Year Transfers or the value thereof from Claimant for the benefit of the estates of the Plaintiffs.

SIXTH CLAIM FOR RELIEF

Avoidance and Recovery of Constructive Voidable Transactions – State Law

43. Plaintiffs reallege and incorporate herein Paragraphs 1 through 14, as if fully set forth herein.

44. The Four Year Transfers constituted transfers of the Plaintiffs' property.

45. The Four Year Transfers were made by the Plaintiffs for less than reasonably equivalent value at a time when the Plaintiffs (i) were insolvent; and/or (ii) were engaged or were about to engage in business or a transaction for which any capital remaining with the Plaintiffs was an unreasonably small capital; and/or (iii) intended to incur, or believed that they would incur, debts beyond their ability to pay as such debts matured.

46. The Four Year Transfers were made to or for the benefit of Claimant.

47. At the times of, and/or subsequent to, each of the Four Year Transfers, Plaintiffs that made one or more of the Four Year Transfers have at least one creditor with an allowable unsecured claim for liabilities, which claim remained unsatisfied as of the Petition Date.

48. The Four Year Transfers are avoidable under applicable law – California Civil Code section 3439.04(a)(2) and/or comparable provisions of law in other jurisdictions that have

adopted the Uniform Voidable Transactions Act, the Uniform Fraudulent Transfer Act or the Uniform Fraudulent Conveyance Act – by a creditor holding an allowed unsecured claim and thus by the Plaintiffs pursuant to Bankruptcy Code section 544(b).

49. As a result of the foregoing, the Plaintiffs are entitled to judgment pursuant to Bankruptcy Code sections 544(b), 550(a), and 551: (a) avoiding the Four Year Transfers free and clear of any claimed interest of Claimant, (b) directing that the Four Year Transfers be set aside, and (c) recovering such Four Year Transfers or the value thereof from Claimant for the benefit of the estates of the Plaintiffs.

SEVENTH CLAIM FOR RELIEF

Equitable Subordination of Claims

50. The Plaintiffs reallege and incorporate herein Paragraphs 1 through 11, as if fully set forth herein.

51. By providing services that helped perpetuate a Ponzi scheme, Claimant engaged in inequitable conduct.

52. Claimant's inequitable conduct has resulted in injury to the Debtors' estates and their other creditors and/or has conferred an unfair advantage on Claimant.

53. Principles of equitable subordination require that any claims asserted by Claimant be equitably subordinated to all other claims against the Debtors.

54. Equitable subordination as requested herein is consistent with the provisions and purposes of the Bankruptcy Code.

55. As a result of the foregoing, the Plaintiffs are entitled to judgment pursuant to Bankruptcy Code section 510(c) equitably subordinating any and all claims that Claimant may assert against any of the Debtors, whatever the origin of those claims, including, without

limitation, any claims that may be asserted under Bankruptcy Code section 502(h), to all other claims against the Debtors.

PRAYER FOR RELIEF

WHEREFORE, by reason of the foregoing, Plaintiffs request that the Court enter judgment:

(1) On the first claim for relief, sustaining the objection to the Claim, decreeing that Claimant take nothing thereon, and directing the Claims' Agent to strike Claim Nos. 2395 and 7739 from the official Claims Register;

(2) On the second claim for relief, (a) avoiding the 90 Day Transfers free and clear of any interest of Claimant, (b) directing that the 90 Day Transfers be set aside, and (c) ordering Claimant to pay to the Plaintiffs $41,575.00;

(3) On the third and fourth claims for relief, (a) avoiding the Two Year Transfers free and clear of any claimed interest of Claimant, (b) directing that the Two Year Transfers be set aside, and (c) ordering Claimant to pay to the Plaintiffs $159,987.50;

(4) On the fifth and sixth claims for relief, (a) avoiding the Four Year Transfers free and clear of any claimed interest of Claimant, (b) directing that the Four Year Transfers be set aside, and (c) ordering Claimant to pay to the Plaintiffs $240,470.43;

(5) On the seventh claim for relief, equitably subordinating any and all claims that Claimant may assert against any of the Debtors, whatever the origin of those claims, including, without limitation, any claims that may be asserted under Bankruptcy Code section 502(h), to all other claims against the Debtors; and

(6) On all claims for relief, awarding the Plaintiffs prejudgment interest as permitted by law, costs of suit, and such other and further relief as is just and proper.

Dated: September 14, 2018
Wilmington, Delaware

/s/ Michael S. Neiburg

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Counsel to the Debtors and Debtors in Possession

EXHIBIT 1

Exhibit 1

90 Day Transfers

Claude G. Cossu

Transferor	Petition Date	Clear Date	Ck. No.	Name	Amount
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/05/17	25798	CLAUDE G COSSU	$3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/04/17	26994	CLAUDE G COSSU	7,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/16/17	27802	CLAUDE G COSSU	6,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/16/17	27600	CLAUDE G COSSU	11,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/31/17	27891	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28573	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28762	CLAUDE G COSSU	5,625.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28768	CLAUDE G COSSU	5,625.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/21/17	28653	CLAUDE G COSSU	875.00
					$41,575.00

EXHIBIT 2

Exhibit 2

Two Year Transfers

Claude G. Cossu

Transferor	Petition Date	Clear Date	Ck. No.	Name	Amount
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	01/04/16	33732	CLAUDE COSSU	$750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	01/13/16	1211	CLAUDE COSSU	250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/12/16	2173	CLAUDE COSSU	1,750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/17/16	2157	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/29/16	2441	CLAUDE COSSU	2,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/02/16	2691	CLAUDE COSSU	416.67
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/04/16	2617	CLAUDE COSSU	4,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/07/16	2964	CLAUDE COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/16/16	3299	CLAUDE COSSU	5,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/21/16	3454	CLAUDE COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/25/16	3522	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/04/16	3755	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/08/16	4148	CLAUDE COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	05/23/16	5419	CLAUDE COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/06/16	6018	CLAUDE COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/07/16	6017	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/07/16	6016	CLAUDE COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/10/16	6248	CLAUDE G COSSU	562.50
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/27/16	7760	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/10/16	8472	CLAUDE G COSSU	7,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/15/16	8471	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/15/16	8624	CLAUDE G COSSU	5,833.33
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/30/16	9313	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/01/16	9356	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/01/16	9312	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/14/16	13507	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/24/16	13872	CLAUDE G COSSU	3,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/24/16	13871	CLAUDE G COSSU	3,675.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/14/16	14545	CLAUDE G COSSU	2,400.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/17/16	14660	CLAUDE G COSSU	1,750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/17/16	14661	CLAUDE G COSSU	3,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	12/19/16	15678	CLAUDE G COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	12/19/16	15679	CLAUDE G COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	12/21/16	16060	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	01/13/17	16625	CLAUDE G COSSU	6,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/13/17	17783	CLAUDE G COSSU	5,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/07/17	18596	CLAUDE G COSSU	1,125.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/08/17	18515	CLAUDE G COSSU	4,750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/07/17	19735	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/28/17	20390	CLAUDE G COSSU	1,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/28/17	20389	CLAUDE G COSSU	5,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/05/17	21661	CLAUDE G COSSU	2,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/14/17	22084	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/17/17	23276	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/17/17	23277	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/18/17	23275	CLAUDE G COSSU	1,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/24/17	23537	CLAUDE G COSSU	1,166.67
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/24/17	23536	CLAUDE G COSSU	2,333.33
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/11/17	24425	CLAUDE G COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/15/17	24537	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/05/17	25798	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/04/17	26994	CLAUDE G COSSU	7,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/16/17	27802	CLAUDE G COSSU	6,000.00
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WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28573	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28762	CLAUDE G COSSU	5,625.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28768	CLAUDE G COSSU	5,625.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/21/17	28653	CLAUDE G COSSU	875.00
					$159,987.50

EXHIBIT 3

Exhibit 3

Four Year Transfers

Claude G. Cossu

Transferor	Petition Date	Clear Date	Ck. No.	Name	Amount
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/08/14	24700	CLAUDE COSSU	$2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/08/14	24699	CLAUDE COSSU	2,200.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/08/14	24840	CLAUDE COSSU	2,400.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/15/14	25166	CLAUDE COSSU	4,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/22/14	25315	CLAUDE COSSU	1,603.08
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/07/14	25558	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/07/14	25559	CLAUDE COSSU	4,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	09/15/14	26835	CLAUDE COSSU	4,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	10/28/14	27969	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	11/26/14	28633	CLAUDE COSSU	1,250.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	02/05/15	30223	CLAUDE COSSU	1,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	02/05/15	30229	CLAUDE COSSU	1,800.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	02/13/15	5160	CLAUDE COSSU	1,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	03/13/15	30338	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	03/13/15	30339	CLAUDE COSSU	2,500.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	03/23/15	30381	CLAUDE COSSU	5,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	04/24/15	30606	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	05/15/15	30833	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	05/29/15	6493	CLAUDE COSSU	566.89
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	06/01/15	30933	CLAUDE COSSU	1,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	06/01/15	6492	CLAUDE COSSU	1,133.79
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	06/08/15	30963	CLAUDE COSSU	1,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	06/22/15	31100	CLAUDE COSSU	1,250.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/01/15	31250	CLAUDE COSSU	2,125.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/07/15	31251	CLAUDE COSSU	4,200.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	07/13/15	31286	CLAUDE COSSU	1,750.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/03/15	31333	CLAUDE COSSU	1,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/10/15	31529	CLAUDE COSSU	1,025.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/17/15	31556	CLAUDE COSSU	3,500.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/19/15	31557	CLAUDE COSSU	1,750.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	08/31/15	31674	CLAUDE COSSU	175.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	09/03/15	31675	CLAUDE COSSU	1,729.17
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	10/01/15	31776	CLAUDE COSSU	1,500.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	10/02/15	31773	CLAUDE COSSU	5,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	10/08/15	32159	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	10/22/15	32395	CLAUDE COSSU	2,400.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	11/02/15	32508	CLAUDE COSSU	291.67
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	11/02/15	32507	CLAUDE COSSU	583.33
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	11/17/15	32790	CLAUDE COSSU	1,750.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	12/02/15	32754	CLAUDE COSSU	2,000.00
WOODBRIDGE STRUCTURED FUNDING, LLC	12/04/17	01/04/16	33732	CLAUDE COSSU	750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	01/13/16	1211	CLAUDE COSSU	250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/12/16	2173	CLAUDE COSSU	1,750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/17/16	2157	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/29/16	2441	CLAUDE COSSU	2,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/02/16	2691	CLAUDE COSSU	416.67
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/04/16	2617	CLAUDE COSSU	4,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/07/16	2964	CLAUDE COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/16/16	3299	CLAUDE COSSU	5,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/21/16	3454	CLAUDE COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/25/16	3522	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/04/16	3755	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/08/16	4148	CLAUDE COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	05/23/16	5419	CLAUDE COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/06/16	6018	CLAUDE COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/07/16	6017	CLAUDE COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/07/16	6016	CLAUDE COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/10/16	6248	CLAUDE G COSSU	562.50
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/27/16	7760	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/10/16	8472	CLAUDE G COSSU	7,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/15/16	8471	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/15/16	8624	CLAUDE G COSSU	5,833.33
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/30/16	9313	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/01/16	9356	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/01/16	9312	CLAUDE G COSSU	3,000.00

Exhibit 3

Four Year Transfers

Claude G. Cossu

Transferor	Petition Date	Clear Date	Ck. No.	Name	Amount
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/14/16	13507	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/24/16	13872	CLAUDE G COSSU	3,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/24/16	13871	CLAUDE G COSSU	3,675.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/14/16	14545	CLAUDE G COSSU	2,400.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/17/16	14660	CLAUDE G COSSU	1,750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/17/16	14661	CLAUDE G COSSU	3,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	12/19/16	15678	CLAUDE G COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	12/19/16	15679	CLAUDE G COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	12/21/16	16060	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	01/13/17	16625	CLAUDE G COSSU	6,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	02/13/17	17783	CLAUDE G COSSU	5,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/07/17	18596	CLAUDE G COSSU	1,125.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	03/08/17	18515	CLAUDE G COSSU	4,750.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/07/17	19735	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/28/17	20390	CLAUDE G COSSU	1,500.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	04/28/17	20389	CLAUDE G COSSU	5,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/05/17	21661	CLAUDE G COSSU	2,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	06/14/17	22084	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/17/17	23276	CLAUDE G COSSU	2,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/17/17	23277	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/18/17	23275	CLAUDE G COSSU	1,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/24/17	23537	CLAUDE G COSSU	1,166.67
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	07/24/17	23536	CLAUDE G COSSU	2,333.33
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/11/17	24425	CLAUDE G COSSU	2,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	08/15/17	24537	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	09/05/17	25798	CLAUDE G COSSU	3,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/04/17	26994	CLAUDE G COSSU	7,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/16/17	27802	CLAUDE G COSSU	6,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/16/17	27600	CLAUDE G COSSU	11,250.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	10/31/17	27891	CLAUDE G COSSU	1,200.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28573	CLAUDE G COSSU	1,000.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28762	CLAUDE G COSSU	5,625.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/20/17	28768	CLAUDE G COSSU	5,625.00
WOODBRIDGE GROUP OF COMPANIES, LLC	12/04/17	11/21/17	28653	CLAUDE G COSSU	875.00
					$240,470.43