

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estates of WOODBRIDGE GROUP
OF COMPANIES, LLC, *et al.*,

Plaintiff,

v.

PAUL & COLLEEN MCINTYRE JOINT
TENANTS WITH RIGHTS OF SURVIVORSHIP,

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc. No. 19-_____ (BLS)

**COMPLAINT FOR AVOIDANCE AND RECOVERY OF
FRAUDULENT TRANSFERS PURSUANT TO 11 U.S.C. §§ 544, 548 & 550**

Plaintiff Michael Goldberg (the “Plaintiff” or “Trustee”), in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust, pursuant to the *First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and Its Affiliated Debtors* dated August 22, 2018 (the “Plan”) of the debtors in the above-captioned cases (the “Debtors”), for his *Complaint for Avoidance and Recovery of Fraudulent Transfers Pursuant to 11 U.S.C. §§ 544, 548 & 550* (the “Complaint”) against Paul & Colleen McIntyre, Joint Tenants with Rights of Survivorship (collectively, the “Defendant”), alleges as follows:

¹The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

Nature of the Action

1. The Plaintiff brings this action against the Defendant to avoid and recover certain fraudulent transfers that occurred prior to commencement of the Debtors' bankruptcy cases.

The Parties

2. Plaintiff is the duly appointed trustee of the Woodbridge Liquidation Trust (the "Trust"), successor in interest to the Debtors. Pursuant to Paragraph 5.4 of the Plan, the Confirmation Findings (defined below) at paragraphs 13-15, and Article IV of the Liquidating Trust Agreement, the Trustee has the sole authority to pursue claims transferred to the Trust by the Debtors through the Plan and to seek any and all related relief.

3. Upon information and belief, the Defendants are individuals, residing in the State of New Hampshire and were former investors with the Debtors.

Jurisdiction and Venue

4. The United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") has jurisdiction over this adversary proceeding under the Bankruptcy Code pursuant to 28 U.S.C. §§ 157(a) and 1334(a).

5. This proceeding is a core proceeding within the meaning of 28 U.S.C. § 157(b) and the Bankruptcy Court may enter final orders for the matters contained herein.

6. Pursuant to Local Bankruptcy Rule 7008-1, the Plaintiff affirms his consent to the entry of final orders or judgments by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

7. Venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409(a).

8. This adversary proceeding is commenced pursuant to Rule 7001(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and sections 547 and 550 of the Bankruptcy Code.

Case Background

9. Commencing with the first filings on December 4, 2017, and continuing with other filings through March 27, 2018, Debtors Woodbridge Group of Companies, LLC, *et al.*, each commenced a case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”). The Chapter 11 Cases are jointly administered under Case No. 17-12560 (BLS).

10. The Plan was confirmed on October 26, 2018, and became effective on February 19, 2019.

Facts

11. Prior to the commencement of the Chapter 11 Cases, the Debtors operated a fraudulent investment “Ponzi Scheme.” In its *Findings of Fact, Conclusions of Law and Order Confirming the First Amended Joint Chapter 11 Plan of Liquidation of Woodbridge Group of Companies, LLC and its Affiliated Debtors*, entered on October 26, 2018 (the “Confirmation Findings”), at paragraph NN, the Bankruptcy Court found as follows:

NN. Conduct of a Ponzi Scheme. The evidence demonstrates, and the Bankruptcy Court hereby finds, that (i) beginning no later than July 2012 through December 1, 2017, Robert H. Shapiro used his web of more than 275 limited liability companies, including the Debtors, to conduct a massive Ponzi scheme raising more than \$1.22 billion from over 8,400 unsuspecting investors nationwide; (ii) the Ponzi scheme involved the payment of purported returns to existing investors from funds contributed by new investors; and (iii) the Ponzi scheme was discovered no later than December 2017.

12. Through this fraudulent scheme, the Debtors raised over one billion dollars from approximately 10,000 investors as either Noteholders or Unitholders (collectively, “Investors”). 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 the Debtors.

13. 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.

14. 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.

15. Defendant invested with the Debtors through the purchase of notes and/or units and received principal and interest payments from the Debtors with respect to the investment. As of the Petition Date, Defendant had been paid in full for all investments with the Debtors, including interest, and is thus a "Net Winner."

16. During the four years prior to the Petition Date, the Debtors made transfers to Defendant for interest on Defendant's investments in an amount not less than \$170,308.01 (the "Net Winnings" or "Fraudulent Transfers"). A list identifying the Fraudulent Transfers is attached hereto as Exhibit A and is incorporated herein by reference.

17. The Plaintiff is informed and believes that at least one creditor holding an unsecured claim that is allowable under Section 502 of the Bankruptcy Code or that is not allowable under Section 502(e) of the Bankruptcy Code exists who can avoid the Fraudulent Transfers and/or obligations referred to in this Complaint. The Plaintiff may assert the rights of such creditors pursuant to Section 544(b) of the Bankruptcy Code.

FIRST CLAIM FOR RELIEF

**(To Avoid Intentionally Fraudulent Transfers under
11 U.S.C. §§ 544(b) and 548(a)(1)(A), and Cal. Civ. Code § 3439, *et seq.*)**

18. Plaintiff realleges and incorporates by reference each and every allegation in the above paragraphs, as though fully set forth herein.

19. As the Debtors operated a Ponzi Scheme, applicable law provides that the Fraudulent Transfers were made to Defendant with an actual intent to hinder, delay, or defraud creditors of the Debtors.

20. Of the Fraudulent Transfers identified in Exhibit A, those made within two years prior to the Petition Date are avoidable pursuant to 11 U.S.C. §548(a)(1)(A) and Cal. Civ. Code § 3439, *et seq.*, and the Transfers made within four years prior to the Petition Date are avoidable under 11 U.S.C. §544(b) and Cal. Civ. Code § 3439, *et seq.* Plaintiff is entitled to an order and judgment that each of the Fraudulent Transfers that constitutes Net Winnings is avoided.

SECOND CLAIM FOR RELIEF

**(Recovery of Property – 11 U.S.C. §§ 544(b) and 550,
and Cal. Civ. Code § 3439, *et seq.*)**

21. Plaintiff realleges and incorporates by reference each and every allegation in the above paragraphs, as though set forth fully herein.

22. Defendant is the initial transferee of the Fraudulent Transfers, or the immediate or mediate transferee of such initial transferee.

23. Plaintiff is entitled to avoid the Net Winnings of the Fraudulent Transfers under Sections 544 and 548 of the Bankruptcy Code, and Cal. Civ. Code § 3439, *et seq.* As Defendant is the initial, immediate, or mediate transferee of Fraudulent Transfers, Plaintiff is entitled to

recover for the estate the proceeds or value of the respective Net Winnings pursuant to under 11 U.S.C. §550 and/or Cal. Civ. Code § 3439, *et seq.*

WHEREFORE, Plaintiff prays for judgment as follows:

1. For a determination that each of the Fraudulent Transfers that constitutes Net Winnings is avoidable as a fraudulent transfer under Sections 544 and 548 of the Bankruptcy Code and Section 3439, *et seq.*, of the California Civil Code, and that Plaintiff is entitled to recover the Net Winnings in the total amount of \$170,308.01 under Section 550 of the Bankruptcy Code and Section 3439, *et seq.*, of the California Civil Code;

2. For costs of suit incurred herein, including, without limitation, attorneys' fees;

3. For pre- and post-judgment interest on the judgment amount to the fullest extent allowed by applicable law; and

4. For such other and further relief as the Court may deem just and proper.

Dated: August 16, 2019

/s/ Colin Robinson

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*Counsel to Plaintiff Michael Goldberg, in his
capacity as Liquidating Trustee of the Woodbridge
Liquidation Trust*

EXHIBIT A

Exhibit A
 Net Winner Receipts and Disbursements
 Bankruptcy Case No. 17-12560

Debtor	Bank Account	Date	Ch. No.	Name	Memo	Receipts	Disbursements
Woodbridge Mortgage Investment Fund 1	1894630647	04/08/13		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	\$ 45,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	04/08/13		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	60,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	04/24/13		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	CANADENSIS, PA - WAS NORFOLK BAL REFUND	15,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	04/24/13		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	85,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	05/02/13	4159	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	E ST LOUIS, IL - SENIOR 1 - APR INT 22 DAYS		\$ 513.26
Woodbridge Mortgage Investment Fund 1	1894630647	05/20/13	4168	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	NORFOLK, VA - SENIOR 2 - APR INT 6 DAYS		133.32
Woodbridge Mortgage Investment Fund 1	1894630647	05/29/13	4251	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	CHAPEL, NEW HAVEN, CT - SENIOR 2 REPL - MAY INT 10 DAYS		188.90
Woodbridge Mortgage Investment Fund 1	1894630647	05/29/13	4221	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	E ST LOUIS - SENIOR 1 - MAY INT		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	05/29/13	4250	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	NORFOLK, VA - SENIOR 2 - MAY INT 21 DAYS		466.62
Woodbridge Mortgage Investment Fund 1	1894630647	06/18/13		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	260,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	07/03/13	4333	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT JUNE		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	07/03/13	4334	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT JUNE		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	07/03/13	4380	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT JUN 12 DAYS		733.32
Woodbridge Mortgage Investment Fund 1	1894630647	08/08/13	4503	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT JUL		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	08/08/13	4504	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT JUL		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	08/08/13	4505	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT JUL		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	09/06/13	4686	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT AUG		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	09/06/13	4687	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT AUG		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	09/06/13	4688	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT AUG		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	10/03/13	4910	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT SEP		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	10/03/13	4909	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT SEP		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	10/03/13	4908	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT SEP		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	11/05/13	5205	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT OCT		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	11/05/13	5204	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT OCT		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	11/05/13	5203	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT OCT		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	12/06/13	5524	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT NOV		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	12/06/13	5523	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT NOV		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	12/06/13	5522	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT NOV		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	01/03/14	5864	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CANADENSIS, PA - INT DEC		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	01/03/14	5863	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR CHAPEL, NEW HAVEN - INT DEC		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	01/03/14	5862	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG SR E ST LOUIS - INT DEC		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	01/31/14	6310	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JAN		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	01/31/14	6309	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CHAPEL, NEW HAVEN - INT JAN		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	01/31/14	6308	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR E ST LOUIS - INT JAN		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	01/31/14	6494	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR E ST LOUIS - INT JAN ADDTL 4%		350.00
Woodbridge Mortgage Investment Fund 1	1894630647	02/28/14		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	5,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	02/28/14		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	5,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	03/03/14	6778	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT FEB		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	03/03/14	6777	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CHAPEL, NEW HAVEN - INT FEB		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	03/03/14	6776	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR E ST LOUIS - INT FEB		700.00
Woodbridge Mortgage Investment Fund 1	1894630647	04/04/14	7281	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT MAR		1,833.33
Woodbridge Mortgage Investment Fund 1	1894630647	04/04/14	7280	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CHAPEL, NEW HAVEN - INT MAR		566.67
Woodbridge Mortgage Investment Fund 1	1894630647	04/04/14	7278	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR JAMAICA, ISL PK, NY - INT MAR		333.33
Woodbridge Mortgage Investment Fund 1	1894630647	04/04/14	7279	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR LAKESHORE, MICH CITY, IN - INT MAR		433.33
Woodbridge Mortgage Investment Fund 2	1894723483	04/29/14	5167	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT APR		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	05/05/14	7796	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT APR		500.00
Woodbridge Mortgage Investment Fund 1	1894630647	06/04/14	8392	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT MAY		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	06/04/14	5298	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT MAY		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	07/07/14	9034	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JUN		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	07/11/14	5871	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT JUN RE-CUT		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	08/04/14	9635	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JUL		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	08/04/14	5924	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT JUL		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	09/17/14	10253	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT AUG		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	09/17/14	7054	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT AUG		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	10/09/14	11239	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT SEP		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	10/09/14	6577	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT SEP		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	10/29/14	20303	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT OCT		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	10/29/14	12079	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT OCT		3,333.33
Woodbridge Structured Funding	1894317690	12/03/14	40511	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT NOV		500.00
Woodbridge Structured Funding	1894317690	12/03/14	40511	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT NOV		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	01/02/15	20857	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT DEC		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	01/06/15	13108	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT DEC		3,333.33

Exhibit A
Net Winner Receipts and Disbursements
Bankruptcy Case No. 17-12560

Debtor	Bank Account	Date	Cl. No.	Name	Memo	Receipts	Disbursements
Woodbridge Mortgage Investment Fund 2	1894723483	03/28/15	14364	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT JAN		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	03/30/15	21411	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JAN		500.00
Woodbridge Mortgage Investment Fund 1	1894630647	03/05/15	21956	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT FEB		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	03/05/15	15619	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT FEB		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	03/30/15	22469	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT MAR		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	03/30/15	17409	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT MAR		3,333.33
Woodbridge Mortgage Investment Fund 2	1894723483	04/16/15		PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP		145,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	04/28/15	22951	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT APR		500.00
Woodbridge Mortgage Investment Fund 2	1894723483	04/28/15	18686	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 SR WESTCHESTER, BRONX, NY - INT APR PARTIAL		521.60
Woodbridge Mortgage Investment Fund 2	1894723483	04/28/15	18391	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT APR		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	05/04/15	23119	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS ADDITIONAL 2% INT		1,375.00
Woodbridge Mortgage Investment Fund 1	1894630647	05/18/15	23146	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT APR ADDTL % 1 DAY		2.08
Woodbridge Mortgage Investment Fund 1	1894630647	06/01/15	23425	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT MAY		562.50
Woodbridge Mortgage Investment Fund 2	1894723483	06/01/15	19385	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT MAY		3,333.33
Woodbridge Mortgage Investment Fund 2	1894723483	06/03/15	19670	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 SR WESTCHESTER, BRONX, NY - INT MAY		1,117.71
Woodbridge Mortgage Investment Fund 2	1894723483	07/02/15	20434	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 SR WESTCHESTER, NY - INT JUN		1,117.71
Woodbridge Mortgage Investment Fund 2	1894723483	07/02/15	20435	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT JUN		3,333.33
Woodbridge Mortgage Investment Fund 2	1894630647	07/10/15	23897	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JUN		562.50
Woodbridge Mortgage Investment Fund 1	1894630647	07/28/15	24337	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JUL		562.50
Woodbridge Mortgage Investment Fund 2	1894723483	07/28/15	21496	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 SR WESTCHESTER, NY - INT JUL		1,117.71
Woodbridge Mortgage Investment Fund 2	1894723483	07/28/15	21497	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT JUL		3,333.33
Woodbridge Mortgage Investment Fund 3	1894942992	08/03/15	DEPOSIT	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	Deposit	5,000.00	
Woodbridge Mortgage Investment Fund 1	1894630647	08/31/15	24723	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT AUG		562.50
Woodbridge Mortgage Investment Fund 2	1894723483	09/01/15	25640	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT AUG		3,333.33
Woodbridge Mortgage Investment Fund 3	1894942992	09/01/15	17469	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HUNTER CREEK, CO - INT AUG		1,187.50
Woodbridge Mortgage Investment Fund 1	1894630647	10/01/15	25085	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT SEP		562.50
Woodbridge Mortgage Investment Fund 3	1894942992	10/01/15	19212	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HUNTER CREEK, CO - INT SEP		1,187.50
Woodbridge Mortgage Investment Fund 2	1894723483	10/05/15	23623	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT SEP		3,333.33
Woodbridge Mortgage Investment Fund 2	1894723483	10/30/15	24709	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT OCT		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	11/16/15	25426	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT OCT		562.50
Woodbridge Mortgage Investment Fund 3	1894942992	11/16/15	21082	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HUNTER CREEK, CO - INT OCT		1,187.50
Woodbridge Mortgage Investment Fund 1	1894630647	12/01/15	25770	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT NOV		562.50
Woodbridge Mortgage Investment Fund 2	1894723483	12/01/15	25859	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT NOV		3,333.33
Woodbridge Mortgage Investment Fund 3	1894942992	12/09/15	23055	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HUNTER CREEK, CO - INT NOV		1,187.50
Woodbridge Mortgage Investment Fund 1	1894630647	01/04/16	26123	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT DEC		562.50
Woodbridge Mortgage Investment Fund 2	1894723483	01/04/16	26770	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT DEC		3,333.33
Woodbridge Mortgage Investment Fund 3	1894942992	01/11/16	25158	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HUNTER CREEK, CO - INT DEC		1,187.50
Woodbridge Mortgage Investment Fund 2	1894723483	02/01/16	27581	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT JAN		3,333.33
Woodbridge Mortgage Investment Fund 3	1894942992	02/01/16	27306	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HIDDEN RIDGE TWO, CA - INT JAN		1,187.50
Woodbridge Mortgage Investment Fund 1	1894630647	02/02/16	26351	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT JAN		562.50
Woodbridge Mortgage Investment Fund 1	1894630647	03/01/16	26624	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA - INT FEB		562.50
Woodbridge Mortgage Investment Fund 3	1894942992	03/01/16	29453	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HIDDEN RIDGE TWO, CA - INT FEB		1,187.50
Woodbridge Mortgage Investment Fund 2	1894723483	03/02/16	28369	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT FEB		3,333.33
Woodbridge Mortgage Investment Fund 2	1894723483	04/04/16	29131	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT INT MAR		3,333.33
Woodbridge Mortgage Investment Fund 1	1894630647	05/19/16	27199	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS 2% ACR INT 24 MOS		3,000.00
Woodbridge Mortgage Investment Fund 3	1894942992	05/19/16	30548	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HIDDEN RIDGE 2 MEZZ INT MAR 18 DAYS		712.44
Woodbridge Mortgage Investment Fund 3	1894630647	05/19/16	35844	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 MZ HIDDEN RIDGE 2 5% INT 4 MOS		2,500.00
Woodbridge Mortgage Investment Fund 1	1894630647	05/20/16	26734	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA INT MAR 18 DAYS		337.50
Woodbridge Mortgage Investment Fund 1	1894630647	05/20/16	26733	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS, PA RETURN		75,000.00
Woodbridge Mortgage Investment Fund 2	1894723483	05/20/16	29358	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT /2% AC INT 24 MOS		16,000.00
Woodbridge Mortgage Investment Fund 2	1894723483	05/20/16	29361	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT RETURN		400,000.00
Woodbridge Mortgage Investment Fund 3	1894942992	05/20/16	30549	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 HIDDEN RIDGE 2 MEZZ RETURN		150,000.00
Woodbridge Mortgage Investment Fund 1	1894630647	05/31/16	27402	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG1 SR CANADENSIS PA-ADTL INT BAL MAR APR MAY 18 DAYS		1,125.00
Woodbridge Mortgage Investment Fund 2	1894723483	05/31/16	30728	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT ADTL INT APR-MAY 18 DAYS		5,333.31
Woodbridge Mortgage Investment Fund 3	1894942992	05/31/16	37639	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 MZ HIDDEN RIDGE ADTL INT BAL MAR,APR, MAY 11 DAYS		2,097.94
Woodbridge Mortgage Investment Fund 2	1894723483	07/05/16	31415	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG2 UNIT - ADTL INT		920.55
Woodbridge Mortgage Investment Fund 3	1894942992	07/05/16	39571	PAUL & COLLEEN MCINTYRE JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP	MTG3 MZ HIDDEN RIDG, CA - ADTL INT		273.29
						\$ 625,000.00	\$ 795,308.01
						Net Disbursements	\$ 170,308.01