

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

In re:

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

Remaining Debtors.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustee of the WOODBRIDGE
LIQUIDATION TRUST,

Plaintiff,

vs.

POSITION BENEFITS, LLC, and CHARLES N.
NILOSEK,

Defendants.

Adversary Proceeding

Case No. 19-_____ (BLS)

**ADVERSARY COMPLAINT: (I) FOR AVOIDANCE AND RECOVERY OF
AVOIDABLE TRANSFERS; AND (II) FOR SALE OF UNREGISTERED
SECURITIES, FOR FRAUD, AND FOR AIDING AND ABETTING FRAUD**

¹ The 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 Woodbridge Liquidation Trust (the “Liquidation Trust” or “Plaintiff”), formed 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 (Bankr. Docket No. 2397) (as it may be amended, modified, supplemented, or restated from time to time, the “Plan”²), as and for its *Adversary Complaint: (I) For Avoidance and Recovery of Avoidable Transfers; and (II) For Sale of Unregistered Securities, for Fraud, and for Aiding and Abetting Fraud* (this “Complaint”) against Position Benefits, LLC (“Position Benefits”) and Charles N. Nilosek (“Nilosek,” collectively with Position Benefits, the “Defendants”), alleges as follows:

NATURE OF THE ACTION

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

2. Those Investors, many of whom were elderly, 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 and his lieutenants.

3. The purpose of this lawsuit is (i) to avoid and recover monies previously paid to Defendant by reason of these activities, on the grounds that such payments were preferential,

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

actually fraudulent, and/or constructively fraudulent; and (ii) to hold Defendant liable for sale of unregistered securities, for fraud, and for aiding and abetting fraud.

JURISDICTION AND VENUE

4. The Court has jurisdiction over this action under 28 U.S.C. §§ 157(a) and 1334. Counts I and II of this adversary proceeding are core within the meaning of 28 U.S.C. § 157(b)(2)(B), (C), (F), and (H), and Counts III, IV, and V are non-core. Plaintiff consents to entry of final orders or judgment by this Court on all counts.

5. Venue of this adversary proceeding is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

THE PARTIES

The Liquidation Trust

6. On December 4, 2017 (the “Initial Petition Date”), certain of the Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code. Other of the Debtors followed with their own voluntary cases (collectively with those of the original Debtors, the “Bankruptcy Cases”) within the following four months (each such date, including the Initial Petition Date, a “Petition Date”).

7. On October 26, 2018, this Court entered an order confirming the Plan (Bankr. Docket No. 2903).

8. The Plan provides for, *inter alia*, the establishment of the Liquidation Trust on the Effective Date of the Plan for the benefit of the Liquidation Trust Beneficiaries in accordance with the terms of the Plan and the Liquidation Trust Agreement. *See* Plan §§ 1.75, 5.4.

9. The Effective Date of the Plan occurred on February 15, 2019.

10. On February 25, 2019, the Court entered an order closing the Bankruptcy Cases of all Debtors except Woodbridge Group of Companies, LLC and Woodbridge Mortgage Investment Fund 1, LLC (together, the “Remaining Debtors”). The Remaining Debtors’ Bankruptcy Cases are jointly administered under Case No. 17-12560 (BLS).

11. On the Effective Date, the Liquidation Trust was automatically vested with all of the Debtors’ and the Estates’ respective rights, title, and interest in and to all Liquidation Trust Assets. *See* Plan § 5.4.3. Further, the Liquidation Trust, as successor in interest to the Debtors, has the right and power to file and pursue any and all “Liquidation Trust Actions” without any further order of the Bankruptcy Court. *Id.* § 5.4.15. “Liquidation Trust Actions” include, *inter alia*, “all Avoidance Actions and Causes of Action held by the Debtors or the Estates” *Id.* § 1.76.

12. In addition to its status as successor in interest to the Debtors and their estates, the Liquidation Trust also holds claims held by Investors who elected to contribute to the Liquidation Trust certain causes of action that those Investors possess against individuals such as Defendant Position Benefits (the “Contributed Claims”). *Id.* § 1.28 (defining “Contributed Claims” to include “All Causes of Action that a Noteholder or Unitholder has against any Person that is not a Released Party and that are related in any way to the Debtors, their predecessors, their respective affiliates, or any Excluded Parties, including ... all Causes of Action based on, arising out of, or related to the marketing, sale, and issuance of any Notes or Units; ... all Causes of Action based on, arising out of, or related to the misrepresentation of any of the Debtors’ financial information, business operations, or related internal controls; and ... all Causes of Action based on, arising out of, or related to any failure to disclose, or actual or attempted cover

up or obfuscation of, any of the conduct described in the Disclosure Statement, including in respect of any alleged fraud related thereto”).

Defendant

13. Defendant Position Benefits is a Massachusetts limited liability company that is owned, managed, dominated, and controlled by Nilosek. Upon information and belief, Nilosek is an individual residing in Massachusetts. Upon information and belief, Defendants acted as financial advisors and/or brokers that sold securities to the public and provided investment services.

14. Defendants sold Notes and Units to unsuspecting Investors, created marketing materials and sales scripts to facilitate the sale of Notes and Units to unsuspecting Investors (often targeting unsophisticated, elderly investors with Individual Retirement Accounts). In so doing, Defendant made materially false and fraudulent statements to induce Investors to provide money. In connection with such conduct, Defendant, directly or indirectly, singly or in concert with others, made use of the means or instrumentalities of interstate commerce, the means or instruments of transportation or communication in interstate commerce, and of the mails.

FACTUAL BACKGROUND

The Fraud

15. At least since July 2012 until shortly before they sought bankruptcy protection, the Debtors were operated as a Ponzi scheme. As this Court explained in its order confirming the Plan:

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.

16. The securities sold by Defendant (*i.e.*, the Debtors' Notes and Units) were not registered with the Securities and Exchange Commission (the "SEC") or applicable state securities agencies and there was no applicable exemption from registration. Nor was Defendant registered as broker-dealers with the SEC or applicable state agencies.

17. 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. Shapiro and his lieutenants represented to Investors that the Debtors' profits would be generated by the difference between the interest rate the Debtors charged its third-party borrowers and the interest rate it paid Investors.

18. In reality, these statements were lies. Investors' money was almost never used to make high-interest loans to unrelated, third-party borrowers, and there was no stream of payments; instead, Investors' money was commingled and used for an assortment of items, 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 properties (almost always owned by a disguised affiliate) cannot be traced to any specific Investor. These are typical characteristics of Ponzi schemes.

19. 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, as such money enabled the Debtors to return fictitious “profits” to early Investors – an essential component of the scheme, because “repaying” early Investors led to new investments, without which 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.

The Four Year Transfers

20. Plaintiff is informed and believes and thereupon alleges that within the four years preceding the Initial Petition Date, Defendants received transfers totaling not less than the amount set forth on Exhibit A hereto (the “Four Year Transfers”), including commission payments and other compensation. The precise Four Year Transfers – including the transferor, its Petition Date, the date of each transfer, and the amount of each transfer – are set forth on Exhibit A.

FIRST CLAIM FOR RELIEF

Avoidance and Recovery of Actual Intent Voidable Transactions – State Law

21. Plaintiff realleges and incorporates herein Paragraphs 1 through 20, as if fully set forth herein.

22. The Four Year Transfers constituted transfers of the Debtors’ property.

23. The Four Year Transfers were made by the Debtors with actual intent to hinder or delay or defraud their creditors insofar as the services allegedly provided in exchange for such transfers perpetuated a Ponzi scheme.

24. The Four Year Transfers were made to or for the benefit of Defendant.

25. Each Debtor that made any of the Four Year Transfers had at least one creditor with an allowable unsecured claim for liabilities, which claim remained unsatisfied as of the Petition Date.

26. 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 Plaintiff pursuant to Bankruptcy Code section 544(b).

27. As a result of the foregoing, Plaintiff is 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 Defendants, (b) directing that the Four Year Transfers be set aside, and (c) recovering such Four Year Transfers or the value thereof from Defendant for the benefit of the Liquidation Trust.

SECOND CLAIM FOR RELIEF

Avoidance and Recovery of Constructive Voidable Transactions – State Law

28. Plaintiff realleges and incorporates herein Paragraphs 1 through 27, as if fully set forth herein.

29. The Four Year Transfers constituted transfers of the Debtors' property.

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

31. The Four Year Transfers were made to or for the benefit of Defendant.

32. At the time of and/or subsequent to each of the Four Year Transfers, each Debtor that made any of the Four Year Transfers had at least one creditor with an allowable unsecured claim for liabilities, which claim remained unsatisfied as of the Petition Date.

33. 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 Plaintiff pursuant to Bankruptcy Code section 544(b).

34. As a result of the foregoing, Plaintiff is 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 Defendant, (b) directing that the Four Year Transfers be set aside, and (c) recovering such Four Year Transfers or the value thereof from Defendants for the benefit of the Liquidation Trust.

THIRD CLAIM FOR RELIEF

Sale of Unregistered Securities (Securities Act Sections 5(a), 5(c), and 12(a))

35. Plaintiff realleges and incorporates herein Paragraphs 1 through 34, as if fully set forth herein.

36. The Notes and Units sold by Defendant Position Benefits were securities within the meaning of the Securities Act.

37. No registration statement was filed or in effect with the SEC pursuant to the Securities Act with respect to the securities issued by the Debtors as described in this Complaint and no exemption from registration existed with respect to these securities.

38. From in or about July 2012 through at least December 4, 2017, Defendant

Position Benefits directly and indirectly:

- a. made use of any means or instruments of transportation or communication in interstate commerce or of the mails to sell securities, through the use or medium of a prospectus or otherwise;
- b. carried or caused to be carried securities through the mails or in interstate commerce, by any means or instruments of transportation, for the purpose of sale or delivery after sale; and/or
- c. made use of any means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy through the use or medium of any prospectus or otherwise any security, without a registration statement having been filed or being in effect with the SEC as to such securities.

39. By reason of the foregoing, Defendant Position Benefits violated Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§ 77e(a) and 77e(c).

40. The Investors who contributed their claims to the Liquidation Trust purchased the unregistered securities issued by the Debtors and as a direct and proximate result sustained significant damages. Accordingly, the Liquidation Trust has standing under Section 12(a)(1) of the Securities Act, 15 U.S.C. § 77l(a)(1), to bring a cause of action seeking damages based on Defendant Position Benefits violations of Section 5(a) and 5(c) of the Securities Act.

41. As a result of the foregoing, Plaintiff is entitled to judgment holding Defendant Position Benefit liable for the sale of unregistered securities, as set forth in Exhibit B, or in an amount to be proven at trial.

FOURTH CLAIM FOR RELIEF

Fraud

42. Plaintiff realleges and incorporates herein Paragraphs 1 through 41, as if fully set forth herein.

43. Defendant Position Benefit misrepresented the facts to Investors, including by making affirmative misrepresentations and by concealing and failing to disclose the true facts. Among the misrepresentations were that 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.

44. In reality, these statements were lies. Investors' money was almost never used to make high-interest loans to unrelated, third-party borrowers, and there was no stream of payments; instead, 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 properties (almost always owned by a disguised affiliate) cannot be traced to any specific Investor.

45. Defendant Position Benefit made these misrepresentations knowingly, with scienter, and with intent to defraud Investors.

46. The Investors who contributed their claims to the Liquidation Trust justifiably relied on Defendant Position Benefits misrepresentations of facts, and as a direct and proximate result sustained hundreds of millions of dollars in damages.

47. As a result of the foregoing, Plaintiff is entitled to judgment holding Defendant Position Benefits liable for fraud, as set forth in Exhibit B, or in an amount to be proven at trial.

FIFTH CLAIM FOR RELIEF

Aiding and Abetting Fraud

48. Plaintiff realleges and incorporates herein Paragraphs 1 through 47, as if fully set forth herein.

49. Shapiro – an architect of the fraud – also misrepresented the facts to Investors, and did so knowingly, with scienter, and with intent to defraud Investors. The Investors who contributed their claims to the Liquidation Trust justifiably relied on Shapiro’s misrepresentations of facts, and as a direct and proximate result sustained hundreds of millions of dollars in damages.

50. Defendant Position Benefits knowingly and substantially assisted Shapiro in defrauding Investors.

51. Defendant Position Benefits was aware of Shapiro’s fraud and acted knowingly in providing substantial and material assistance to Shapiro.

52. Defendant Position Benefits substantially benefited by receiving income, commissions, and bonuses.

53. As a result of the foregoing, Plaintiff is entitled to judgment holding Defendant Position Benefits liable for aiding and abetting fraud, as set forth in Exhibit B, or in an amount to be proven at trial, in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, by reason of the foregoing, Plaintiff requests that the Court enter judgment:

- (1) On the first and second claims for relief, (a) avoiding the Four Year Transfers free and clear of any claimed interest of Defendant, (b) directing that the Four Year Transfers be set aside, and (c) ordering Defendant to pay to Plaintiff \$1,231,783.73;

- (2) On the third claim for relief, holding Defendant liable for damages, in the amount of \$486,680.66 for sale of Notes and/or Units as set forth in Exhibit B, or in an amount to be proven at trial, arising from Defendant's sale of unregistered securities;
- (3) On the fourth claim for relief, holding Defendant liable for fraud, for \$486,680.66 for sale of Notes and/or Units as set forth in Exhibit B in an amount to be proven at trial;
- (4) On the fifth claim for relief, holding Defendant liable for aiding and abetting fraud, in the amount of \$486,680.66 for sale of Notes and/or Units as set forth in Exhibit B, or in an amount to be proven at trial; and
- (5) On all claims for relief, awarding Plaintiff prejudgment interest as permitted by law, costs of suit, and such other and further relief as is just and proper.

Dated: November 27, 2019
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Richard M. Pachulski (CA Bar No. 90073)

Andrew W. Caine (CA Bar No. 110345)

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*Counsel to Plaintiff, as Liquidating Trustee of the
Woodbridge Liquidation Trust*

Exhibit A
Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	10/20/15	CHUCK NILOSEK		\$ 10,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	10/14/15	CHUCK NILOSEK		10,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	09/30/15	CHUCK NILOSEK		70,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	05/04/15	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	05/01/15	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/27/15	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/16/15	POSITION BENEFITS LLC		47,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/09/15	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/06/15	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/03/15	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/26/15	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/18/15	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/10/15	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/02/15	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	02/27/15	POSITION BENEFITS LLC		25,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	02/18/15	POSITION BENEFITS LLC		25,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	02/12/15	POSITION BENEFITS LLC	\$ 30,000.00	
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	02/12/15	POSITION BENEFITS LLC		30,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	02/12/15	POSITION BENEFITS LLC		30,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	5099	12/04/17	03/16/15	POSITION BENEFITS LLC		989.58
WOODBIDGE STRUCTURED FUNDING, LLC	5106	12/04/17	03/16/15	POSITION BENEFITS LLC		6,606.16
WOODBIDGE STRUCTURED FUNDING, LLC	30220	12/04/17	02/05/15	POSITION BENEFITS LLC		16,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	30193	12/04/17	01/30/15	POSITION BENEFITS LLC		3,750.00
WOODBIDGE STRUCTURED FUNDING, LLC	30194	12/04/17	01/30/15	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	30196	12/04/17	01/30/15	POSITION BENEFITS LLC		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	30197	12/04/17	01/30/15	POSITION BENEFITS LLC		1,125.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	01/26/15	POSITION BENEFITS LLC		25,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	29805	12/04/17	01/16/15	POSITION BENEFITS LLC		6,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	29808	12/04/17	01/16/15	POSITION BENEFITS LLC		666.67
WOODBIDGE STRUCTURED FUNDING, LLC	29815	12/04/17	01/16/15	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	29816	12/04/17	01/16/15	POSITION BENEFITS LLC		1,705.07
WOODBIDGE STRUCTURED FUNDING, LLC	29817	12/04/17	01/16/15	POSITION BENEFITS LLC		2,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	01/06/15	POSITION BENEFITS LLC	40,000.00	
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	01/06/15	POSITION BENEFITS LLC		40,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	01/06/15	POSITION BENEFITS LLC		40,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	29756	12/04/17	03/16/15	POSITION BENEFITS LLC		4,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	29672	12/04/17	03/16/15	POSITION BENEFITS LLC		5,625.00
WOODBIDGE STRUCTURED FUNDING, LLC	29294	12/04/17	01/05/15	POSITION BENEFITS LLC		7,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	29163	12/04/17	12/17/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	12/04/14	POSITION BENEFITS LLC		25,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	28488	12/04/17	11/18/14	POSITION BENEFITS LLC		6,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	28260	12/04/17	11/18/14	POSITION BENEFITS LLC		7,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	28261	12/04/17	11/18/14	POSITION BENEFITS LLC		2,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	28297	12/04/17	11/18/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	28167	12/04/17	11/10/14	POSITION BENEFITS LLC		720.00
WOODBIDGE STRUCTURED FUNDING, LLC	28168	12/04/17	11/10/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	28169	12/04/17	11/26/14	POSITION BENEFITS LLC		4,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	28170	12/04/17	11/10/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	28133	12/04/17	11/04/14	POSITION BENEFITS LLC		9,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	28134	12/04/17	11/04/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	28135	12/04/17	11/04/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	28136	12/04/17	11/04/14	POSITION BENEFITS LLC		8,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	28064	12/04/17	11/10/14	POSITION BENEFITS LLC		166.67
WOODBIDGE STRUCTURED FUNDING, LLC	28065	12/04/17	11/10/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	28011	12/04/17	10/27/14	POSITION BENEFITS LLC		6,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27958	12/04/17	10/27/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	27946	12/04/17	10/24/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27947	12/04/17	10/24/14	POSITION BENEFITS LLC		1,750.00

Exhibit A
Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE STRUCTURED FUNDING, LLC	27851	12/04/17	10/21/14	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27812	12/04/17	10/21/14	POSITION BENEFITS LLC		285.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	10/14/14	POSITION BENEFITS LLC	39,980.00	
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	10/14/14	POSITION BENEFITS LLC		40,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	10/14/14	POSITION BENEFITS LLC		40,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27701	12/04/17	10/21/14	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27702	12/04/17	10/21/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27703	12/04/17	10/21/14	POSITION BENEFITS LLC		16,260.00
WOODBIDGE STRUCTURED FUNDING, LLC	27704	12/04/17	10/21/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27574	12/04/17	10/14/14	POSITION BENEFITS LLC		18,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27531	12/04/17	10/14/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27532	12/04/17	10/14/14	POSITION BENEFITS LLC		2,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	27461	12/04/17	10/14/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27462	12/04/17	10/14/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27464	12/04/17	10/14/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27465	12/04/17	10/14/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27466	12/04/17	10/14/14	POSITION BENEFITS LLC		1,750.00
WOODBIDGE STRUCTURED FUNDING, LLC	27469	12/04/17	10/14/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27420	12/04/17	10/07/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27421	12/04/17	10/07/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27311	12/04/17	09/30/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27312	12/04/17	09/30/14	POSITION BENEFITS LLC		3,840.00
WOODBIDGE STRUCTURED FUNDING, LLC	27168	12/04/17	09/30/14	POSITION BENEFITS LLC		1,300.00
WOODBIDGE STRUCTURED FUNDING, LLC	27141	12/04/17	09/30/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27152	12/04/17	09/30/14	POSITION BENEFITS LLC		1,200.00
WOODBIDGE STRUCTURED FUNDING, LLC	27161	12/04/17	09/30/14	POSITION BENEFITS LLC		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27127	12/04/17	09/30/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	27130	12/04/17	09/25/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	27136	12/04/17	09/30/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	26934	12/04/17	09/18/14	POSITION BENEFITS LLC		2,375.00
WOODBIDGE STRUCTURED FUNDING, LLC	26860	12/04/17	09/25/14	POSITION BENEFITS LLC		31.25
WOODBIDGE STRUCTURED FUNDING, LLC	26725	12/04/17	09/16/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26726	12/04/17	09/16/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	26727	12/04/17	09/16/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	26728	12/04/17	09/16/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26729	12/04/17	09/16/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26730	12/04/17	09/16/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26732	12/04/17	09/16/14	POSITION BENEFITS LLC		2,600.00
WOODBIDGE STRUCTURED FUNDING, LLC	26733	12/04/17	09/16/14	POSITION BENEFITS LLC		200.00
WOODBIDGE STRUCTURED FUNDING, LLC	26734	12/04/17	09/16/14	POSITION BENEFITS LLC		100.00
WOODBIDGE STRUCTURED FUNDING, LLC	26764	12/04/17	09/12/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	26425	12/04/17	09/02/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26426	12/04/17	09/02/14	POSITION BENEFITS LLC		2,137.50
WOODBIDGE STRUCTURED FUNDING, LLC	26292	12/04/17	09/02/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	26293	12/04/17	09/02/14	POSITION BENEFITS LLC		4,750.00
WOODBIDGE STRUCTURED FUNDING, LLC	26307	12/04/17	09/02/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26308	12/04/17	09/02/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	26125	12/04/17	09/02/14	POSITION BENEFITS LLC		10,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	26132	12/04/17	09/02/14	POSITION BENEFITS LLC		958.33
WOODBIDGE STRUCTURED FUNDING, LLC	26065	12/04/17	09/02/14	POSITION BENEFITS LLC		13,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	26067	12/04/17	09/02/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	08/12/14	POSITION BENEFITS LLC		25,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	25933	12/04/17	08/15/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	25934	12/04/17	08/15/14	POSITION BENEFITS LLC		3,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	25935	12/04/17	08/15/14	POSITION BENEFITS LLC		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	25765	12/04/17	08/04/14	POSITION BENEFITS LLC		2,260.00
WOODBIDGE STRUCTURED FUNDING, LLC	25766	12/04/17	08/04/14	POSITION BENEFITS LLC		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	25767	12/04/17	08/04/14	POSITION BENEFITS LLC		500.00

Exhibit A
Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE STRUCTURED FUNDING, LLC	25768	12/04/17	08/04/14	POSITION BENEFITS LLC		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	25344	12/04/17	07/25/14	POSITION BENEFITS LLC		800.00
WOODBIDGE STRUCTURED FUNDING, LLC	25223	12/04/17	07/14/14	POSITION BENEFITS LLC		1,200.00
WOODBIDGE STRUCTURED FUNDING, LLC	25125	12/04/17	07/14/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	25206	12/04/17	07/14/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	25209	12/04/17	07/14/14	POSITION BENEFITS LLC		9,002.50
WOODBIDGE STRUCTURED FUNDING, LLC	24962	12/04/17	07/08/14	POSITION BENEFITS LLC		22,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	24933	12/04/17	07/08/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	24944	12/04/17	07/08/14	POSITION BENEFITS LLC		2,600.00
WOODBIDGE STRUCTURED FUNDING, LLC	24945	12/04/17	07/08/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	24946	12/04/17	07/08/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	24947	12/04/17	07/08/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24722	12/04/17	06/30/14	POSITION BENEFITS LLC		4,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	24724	12/04/17	06/30/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	24726	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24728	12/04/17	06/30/14	POSITION BENEFITS LLC		3,750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24730	12/04/17	06/30/14	POSITION BENEFITS LLC		600.00
WOODBIDGE STRUCTURED FUNDING, LLC	24732	12/04/17	06/30/14	POSITION BENEFITS LLC		450.00
WOODBIDGE STRUCTURED FUNDING, LLC	24734	12/04/17	06/30/14	POSITION BENEFITS LLC		1,125.00
WOODBIDGE STRUCTURED FUNDING, LLC	24736	12/04/17	06/30/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24738	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24740	12/04/17	06/30/14	POSITION BENEFITS LLC		450.00
WOODBIDGE STRUCTURED FUNDING, LLC	24742	12/04/17	06/30/14	POSITION BENEFITS LLC		2,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	24744	12/04/17	06/30/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	24746	12/04/17	06/30/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24748	12/04/17	06/30/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24750	12/04/17	06/30/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24752	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24754	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24756	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24758	12/04/17	06/30/14	POSITION BENEFITS LLC		1,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	24762	12/04/17	06/30/14	POSITION BENEFITS LLC		2,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	24764	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24766	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24768	12/04/17	06/30/14	POSITION BENEFITS LLC		600.00
WOODBIDGE STRUCTURED FUNDING, LLC	24772	12/04/17	06/30/14	POSITION BENEFITS LLC		900.00
WOODBIDGE STRUCTURED FUNDING, LLC	24774	12/04/17	06/30/14	POSITION BENEFITS LLC		1,350.00
WOODBIDGE STRUCTURED FUNDING, LLC	24776	12/04/17	06/30/14	POSITION BENEFITS LLC		450.00
WOODBIDGE STRUCTURED FUNDING, LLC	24778	12/04/17	06/30/14	POSITION BENEFITS LLC		450.00
WOODBIDGE STRUCTURED FUNDING, LLC	24780	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24781	12/04/17	06/30/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	24625	12/04/17	06/23/14	POSITION BENEFITS LLC		275.00
WOODBIDGE STRUCTURED FUNDING, LLC	24626	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	24627	12/04/17	06/30/14	POSITION BENEFITS LLC		450.00
WOODBIDGE STRUCTURED FUNDING, LLC	24628	12/04/17	06/30/14	POSITION BENEFITS LLC		1,875.00
WOODBIDGE STRUCTURED FUNDING, LLC	24629	12/04/17	06/30/14	POSITION BENEFITS LLC		375.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	06/06/14	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	05/29/14	POSITION BENEFITS LLC		10,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	05/29/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	24163	12/04/17	05/28/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	05/16/14	POSITION BENEFITS LLC		29,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	23916	12/04/17	05/19/14	POSITION BENEFITS LLC		20,100.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	05/02/14	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	23627	12/04/17	05/05/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC	762.50	
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		12,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		2,400.00

Exhibit A
Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		1,600.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		1,200.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/30/14	POSITION BENEFITS LLC		562.50
WOODBIDGE STRUCTURED FUNDING, LLC	23540	12/04/17	04/28/14	POSITION BENEFITS LLC		2,600.00
WOODBIDGE STRUCTURED FUNDING, LLC	23541	12/04/17	04/28/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	04/17/14	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	23433	12/04/17	04/21/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	23001	12/04/17	04/01/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	23013	12/04/17	04/01/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	22979	12/04/17	04/01/14	POSITION BENEFITS LLC		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/18/14	POSITION BENEFITS LLC		16,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/18/14	POSITION BENEFITS LLC		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	WIRE	12/04/17	03/17/14	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	22563	12/04/17	03/10/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	22452	12/04/17	03/04/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	22453	12/04/17	03/04/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	22432	12/04/17	03/04/14	POSITION BENEFITS LLC		6,160.00
WOODBIDGE STRUCTURED FUNDING, LLC	22216	12/04/17	02/25/14	POSITION BENEFITS LLC		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	22116	12/04/17	02/25/14	POSITION BENEFITS LLC		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	21872	12/04/17	02/06/14	POSITION BENEFITS LLC		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21872	12/04/17	02/06/14	POSITION BENEFITS LLC		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21858	12/04/17	02/03/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21859	12/04/17	02/03/14	POSITION BENEFITS LLC		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21821	12/04/17	02/03/14	POSITION BENEFITS LLC		2,700.00
WOODBIDGE STRUCTURED FUNDING, LLC	21755	12/04/17	01/30/14	POSITION BENEFITS LLC		7,200.00
WOODBIDGE STRUCTURED FUNDING, LLC	21568	12/04/17	01/17/14	POSITION BENEFITS LLC		15,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21514	12/04/17	01/10/14	POSITION BENEFITS LLC		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21465	12/04/17	01/10/14	POSITION BENEFITS LLC		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21450	12/04/17	01/10/14	POSITION BENEFITS LLC		10,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	21205	12/04/17	12/18/13	POSITION BENEFITS LLC		20,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	20949	12/04/17	12/16/13	POSITION BENEFITS LLC		500.00
WOODBIDGE STRUCTURED FUNDING, LLC	20949	12/04/17	12/16/13	POSITION BENEFITS LLC		500.00
WOODBIDGE STRUCTURED FUNDING, LLC	20833	12/04/17	12/10/13	POSITION BENEFITS LLC		5,000.00
TOTALS - 4 YEAR					\$ 110,742.50	\$ 1,342,526.23
NET DISBURSEMENTS - 4 YEAR						\$ 1,231,783.73

Exhibit B
 Schedule of Claims Contributed by Investors
 Broker(s): Position Benefits, LLC

Investor Name	Outstanding Investor Principal Amounts		Net/Allowed Claim Amounts	
	Class 3	Class 5	Class 3	Class 5
PROV. TR GP-FBO EVAN BRODIE IRA	\$ -	\$ 725,000.00	\$ -	\$ 486,680.66
Totals	\$ -	\$ 725,000.00	\$ -	\$ 486,680.66