

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

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

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.

WEALTH MANAGEMENT RESOURCES, LLC, an  
Arizona limited liability company; and GREGORY  
NEAL JOHNSON, an individual,

Defendants.

Adversary Proceeding

Case No. 19-\_\_\_\_\_ (BLS)

**ADVERSARY COMPLAINT FOR AVOIDANCE  
AND RECOVERY OF AVOIDABLE TRANSFERS**

<sup>1</sup> 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”<sup>2</sup>), as and for its *Adversary Complaint for Avoidance and Recovery of Avoidable Transfers* (this “Complaint”) against Wealth Management Resources, LLC (“WMR”) and Gregory Neal Johnson (“Johnson,” together with WMR, 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 to avoid and recover monies previously paid to Defendant by reason of these activities, on the grounds that such payments were preferential, actually fraudulent, and/or constructively fraudulent.

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

### **JURISDICTION AND VENUE**

4. The Court has jurisdiction over this action under 28 U.S.C. §§ 157(a) and 1334. Counts I, II, III, IV, and V of this adversary proceeding are core within the meaning of 28 U.S.C. § 157(b)(2)(B), (C), (F), and (H). 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.

***Defendants***

12. At all times relevant hereto, Plaintiff is informed and believes and thereupon alleges Defendant WMR is an Arizona limited liability company that is owned, managed, dominated, and controlled by Defendant Johnson. Defendant Johnson is an individual residing in the state of Nevada. Upon information and belief, Defendants acted as financial advisors and/or brokers that sold securities to the public and provided investment services.

13. 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, Defendants made materially false and fraudulent statements to induce Investors to provide money. In connection with such conduct, Defendants, 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***

14. 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.

15. The securities sold by Defendants (*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 were Defendants registered as broker-dealers with the SEC or applicable state agencies.

16. 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.

17. 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.

18. 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 Transfers***

19. Plaintiff is informed and believes and thereupon alleges that within the 90 days preceding the relevant transferor's petition date, Defendants received transfers totaling not less than the amount set forth on Exhibit A hereto (the "90 Day Transfers"), including commission payments and other compensation. The precise 90 Day Transfers – including the transferor, its Petition Date, the date of each transfer, and the amount of each transfer – are set forth on Exhibit A.

20. Plaintiff is informed and believes and thereupon alleges that within the two years preceding the Initial Petition Date, Defendants received transfers totaling not less than the amount set forth on Exhibit A hereto (the “Two Year Transfers”), including commission payments and other compensation. (The Two Year Transfers are inclusive of the 90 Day Transfers, but Plaintiff does not seek to recover the same sum more than once.) The Two 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.

21. 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” and, collectively with the 90 Day Transfers and the Two Year Transfers, the “Transfers”), including commission payments and other compensation. (The Four Year Transfers are inclusive of the 90 Day Transfers and the Two Year Transfers, but Plaintiff does not seek to recover the same sum more than once.) 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 Preferential Transfers**

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

23. The 90 Day Transfers constituted transfers of the Debtors’ property.

24. The 90 Day Transfers were made to or for the benefit of Defendants on account of an antecedent debt and while the Debtors were insolvent. The affirmative assertion that the Debtors were insolvent at the times 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).

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

26. As a result of the foregoing, Plaintiff is 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 Defendants, (b) directing that the 90 Day Transfers be set aside, and (c) recovering the 90 Day Transfers or the value thereof from Defendants, jointly and severally, for the benefit of the Liquidation Trust.

### **SECOND CLAIM FOR RELIEF**

#### **Avoidance and Recovery of Actual Intent Fraudulent Transfers – Bankruptcy Code**

27. Plaintiff realleges and incorporates herein Paragraphs 1 through 26, as if fully set forth herein.

28. The Two Year Transfers constituted transfers of the Debtors' property.

29. The Two 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.

30. The Two Year Transfers were made to or for the benefit of Defendants.

31. As a result of the foregoing, Plaintiff is 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 Defendants, (b) directing that the Two Year Transfers be set



aside, and (c) recovering such Two Year Transfers or the value thereof from Defendants, jointly and severally, for the benefit of the Liquidation Trust.

**THIRD CLAIM FOR RELIEF**

**Avoidance and Recovery of Constructive Fraudulent Transfers – Bankruptcy Code**

32. Plaintiff realleges and incorporates herein Paragraphs 1 through 31, as if fully set forth herein.

33. The Two Year Transfers constituted transfers of the Debtors' property.

34. The Two 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 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 Debtors would incur, debts beyond their ability to pay as such debts matured.

35. The Two Year Transfers were made to or for the benefit of Defendants.

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

**FOURTH CLAIM FOR RELIEF**

**Avoidance and Recovery of Actual Intent Voidable Transactions – State Law**

37. Plaintiff realleges and incorporates herein Paragraphs 1 through 36, as if fully set forth herein.

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

39. 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.

40. The Four Year Transfers were made to or for the benefit of Defendants.

41. 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.

42. 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).

43. 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 Defendants, jointly and severally, for the benefit of the Liquidation Trust.

#### **FIFTH CLAIM FOR RELIEF**

##### **Avoidance and Recovery of Constructive Voidable Transactions – State Law**

44. Plaintiff realleges and incorporates herein Paragraphs 1 through 43, as if fully set forth herein.

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

46. 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.

47. The Four Year Transfers were made to or for the benefit of Defendants.

48. 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.

49. 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).

50. 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 Defendants, jointly and severally, for the benefit of the Liquidation Trust.

### **PRAYER FOR RELIEF**

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

- (1) On the first claim for relief, (a) avoiding the 90 Day Transfers free and clear of any interest of Defendants, (b) directing that the 90 Day Transfers

be set aside, and (c) ordering Defendants, jointly and severally, to pay to Plaintiff \$745.83

- (2) On the second and third claims for relief, (a) avoiding the Two Year Transfers free and clear of any claimed interest of Defendants, (b) directing that the Two Year Transfers be set aside, and (c) ordering Defendants, jointly and severally, to pay to Plaintiff \$47,445.83;
- (3) On the fourth and fifth claims for relief, (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) ordering Defendants, jointly and severally, to pay to Plaintiff \$ 57,835.83; and
- (4) 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: December 1, 2019  
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

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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
WOODBRIIDGE GROUP OF COMPANIES, LLC	27106	12/04/17	10/16/17	GREGORY N JOHNSON	\$ 254.17	
WOODBRIIDGE GROUP OF COMPANIES, LLC	27106	12/04/17	10/16/17	GREGORY N JOHNSON		\$ 1,000.00
TOTALS - 90 DAY					254.17	1,000.00
NET DISBURSEMENTS - 90 DAY						745.83
WOODBRIIDGE GROUP OF COMPANIES, LLC	21779	12/04/17	06/14/17	GREGORY N JOHNSON		1,600.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	20741	12/04/17	06/14/17	GREGORY N JOHNSON	150.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	20741	12/04/17	06/14/17	GREGORY N JOHNSON		1,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	18687	12/04/17	03/17/17	GREGORY N JOHNSON	450.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	18687	12/04/17	03/17/17	GREGORY N JOHNSON		675.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	17284	12/04/17	02/14/17	GREGORY N JOHNSON		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14602	12/04/17	12/08/16	GREGORY N JOHNSON	125.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	14602	12/04/17	12/08/16	GREGORY N JOHNSON		675.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	13863	12/04/17	10/20/16	GREGORY NEAL JOHNSON	666.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	13863	12/04/17	10/20/16	GREGORY NEAL JOHNSON	250.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	13863	12/04/17	10/20/16	GREGORY NEAL JOHNSON		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	13510	12/04/17	10/17/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	9319	12/04/17	08/31/16	GREGORY NEAL JOHNSON	833.33	
WOODBRIIDGE GROUP OF COMPANIES, LLC	9319	12/04/17	08/31/16	GREGORY NEAL JOHNSON	312.50	
WOODBRIIDGE GROUP OF COMPANIES, LLC	9319	12/04/17	08/31/16	GREGORY NEAL JOHNSON		1,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	9165	12/04/17	08/25/16	GREGORY NEAL JOHNSON		1,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8979	12/04/17	08/25/16	GREGORY NEAL JOHNSON	390.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	8979	12/04/17	08/25/16	GREGORY NEAL JOHNSON		1,170.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8580	12/04/17	08/16/16	GREGORY NEAL JOHNSON	326.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	8580	12/04/17	08/16/16	GREGORY NEAL JOHNSON		980.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8282	12/04/17	08/08/16	GREGORY NEAL JOHNSON	1,250.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	8282	12/04/17	08/08/16	GREGORY NEAL JOHNSON		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8283	12/04/17	08/08/16	GREGORY NEAL JOHNSON	750.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	8283	12/04/17	08/08/16	GREGORY NEAL JOHNSON		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8069	12/04/17	08/08/16	GREGORY NEAL JOHNSON	416.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	8069	12/04/17	08/08/16	GREGORY NEAL JOHNSON		1,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6883	12/04/17	06/30/16	GREGORY NEAL JOHNSON	625.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	6883	12/04/17	06/30/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6884	12/04/17	06/30/16	GREGORY NEAL JOHNSON	1,000.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	6884	12/04/17	06/30/16	GREGORY NEAL JOHNSON		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6865	12/04/17	06/27/16	WEALTH MANAGEMENT RESOURCES, LLC		2,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	5267	12/04/17	05/18/16	GREGORY NEAL JOHNSON	825.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	5267	12/04/17	05/18/16	GREGORY NEAL JOHNSON		990.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	4969	12/04/17	05/11/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	4697	12/04/17	05/11/16	GREGORY NEAL JOHNSON		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	4503	12/04/17	04/20/16	GREGORY NEAL JOHNSON		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	4319	12/04/17	04/18/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	4320	12/04/17	04/18/16	GREGORY NEAL JOHNSON		900.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	4072	12/04/17	04/18/16	GREGORY NEAL JOHNSON		2,600.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	3987	12/04/17	04/06/16	GREGORY NEAL JOHNSON		1,400.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	3988	12/04/17	04/05/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	3989	12/04/17	04/05/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	3538	12/04/17	04/05/16	GREGORY NEAL JOHNSON		2,400.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	2887	12/04/17	03/10/16	GREGORY NEAL JOHNSON		1,750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	2718	12/04/17	03/10/16	GREGORY NEAL JOHNSON		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	2719	12/04/17	03/10/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	2606	12/04/17	03/02/16	GREGORY NEAL JOHNSON		1,750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	2613	12/04/17	03/02/16	GREGORY NEAL JOHNSON		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	2503	12/04/17	02/26/16	GREGORY NEAL JOHNSON		990.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33931	12/04/17	01/05/16	GREGORY NEAL JOHNSON	2,000.00	
WOODBRIIDGE STRUCTURED FUNDING, LLC	33931	12/04/17	01/05/16	GREGORY NEAL JOHNSON		2,400.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33932	12/04/17	01/05/16	GREGORY NEAL JOHNSON	1,433.33	
WOODBRIIDGE STRUCTURED FUNDING, LLC	33932	12/04/17	01/05/16	GREGORY NEAL JOHNSON		1,720.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33943	12/04/17	01/05/16	GREGORY NEAL JOHNSON		1,500.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33896	12/04/17	01/05/16	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33709	12/04/17	01/05/16	GREGORY NEAL JOHNSON		3,000.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33624	12/04/17	12/28/15	GREGORY NEAL JOHNSON		1,170.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33625	12/04/17	12/28/15	GREGORY NEAL JOHNSON		980.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33387	12/04/17	12/14/15	GREGORY NEAL JOHNSON	2,083.33	
WOODBRIIDGE STRUCTURED FUNDING, LLC	33387	12/04/17	12/14/15	GREGORY NEAL JOHNSON		2,500.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33321	12/04/17	12/14/15	GREGORY NEAL JOHNSON		1,250.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33322	12/04/17	12/14/15	GREGORY NEAL JOHNSON		875.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33198	12/04/17	12/09/15	GREGORY NEAL JOHNSON		875.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33226	12/04/17	12/09/15	GREGORY NEAL JOHNSON	687.50	
WOODBRIIDGE STRUCTURED FUNDING, LLC	33226	12/04/17	12/09/15	GREGORY NEAL JOHNSON		750.00
WOODBRIIDGE STRUCTURED FUNDING, LLC	33227	12/04/17	12/09/15	GREGORY NEAL JOHNSON	625.00	
WOODBRIIDGE STRUCTURED FUNDING, LLC	33227	12/04/17	12/09/15	GREGORY NEAL JOHNSON		750.00
TOTALS - 2 YEAR (INCL. 90 DAY)					15,454.17	62,900.00
NET DISBURSEMENTS - 2 YEAR (INCL. 90 DAY)						47,445.83

EXHIBIT A  
Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE STRUCTURED FUNDING, LLC	32762	12/04/17	11/17/15	GREGORY NEAL JOHNSON		1,720.00
WOODBIDGE STRUCTURED FUNDING, LLC	32546	12/04/17	11/03/15	GREGORY NEAL JOHNSON		1,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	32461	12/04/17	10/27/15	GREGORY NEAL JOHNSON		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	32462	12/04/17	10/27/15	GREGORY NEAL JOHNSON		1,020.00
WOODBIDGE STRUCTURED FUNDING, LLC	32463	12/04/17	10/27/15	GREGORY NEAL JOHNSON		750.00
WOODBIDGE STRUCTURED FUNDING, LLC	32312	12/04/17	10/19/15	GREGORY NEAL JOHNSON		2,500.00
WOODBIDGE STRUCTURED FUNDING, LLC	32210	12/04/17	10/16/15	GREGORY NEAL JOHNSON		750.00
TOTALS - 4 YEAR (INCL. 2 YEAR AND 90 DAY)					\$ 15,454.17	\$ 73,290.00
NET DISBURSEMENTS - 4 YEAR (INCL. 2 YEAR AND 90 DAY)						\$ 57,835.83