

**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.

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

Plaintiff,

vs.

DAN REISINGER,

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

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

**COMPLAINT OBJECTING TO CLAIMS AND COUNTERCLAIMING  
FOR AVOIDANCE AND RECOVERY OF AVOIDABLE TRANSFERS,  
FOR EQUITABLE SUBORDINATION, FOR SALE OF UNREGISTERED  
SECURITIES, FRAUD, AND FOR AIDING AND ABETTING FRAUD**

<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 *Complaint Objecting to Claims and Counterclaiming for Avoidance and Recovery of Avoidable Transfers, for Equitable Subordination, for Sale of Unregistered Securities, for Fraud, and for Aiding and Abetting Fraud* (this “Complaint”) against Dan Reisinger (“Defendant”), alleges as follows:

### **NATURE OF THE ACTION**

1. Beginning no later than July 2012 through December 1, 2017, Woodbridge Group of Companies, LLC and its 305 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 nationwide 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 object to the Claims (defined below) so that Defendant is not further compensated at the expense of legitimate creditors for activities that

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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.

advanced the Ponzi scheme and further drove the Debtors into insolvency, and to the extent the Claim, or any new or amended claims, survive, to equitably subordinate them, (ii) 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; and (iii) 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, II, III, IV, V, VI, and VII of this adversary proceeding are core within the meaning of 28 U.S.C. § 157(b)(2)(B), (C), (F), and (H). Counts VIII, IX, and X 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 (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 is an individual residing in the State of Pennsylvania. Upon information and belief, Defendant acted as a financial advisor and/or broker that sold securities to the public and provided investment services.

14. Defendant 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 a broker-dealer 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 Proof(s) of Claim***

20. Defendant was scheduled by the Debtors for claims against the Debtors as identified in particular on Exhibit A hereto (collectively the “Claims”). The Claims are based on Notes and/or Units held by and commissions owed to Defendant.

21. Defendant engaged in activities that generated investments in the Debtors. Defendant is or was in the business of selling investment products, including the Debtors’ Notes and/or Units, to retail investors. Defendant solicited and sold Notes and/or Units to investors. Defendant received commission payments from the Debtors on account of Notes and/or Units sold to investors

***The Transfers***

22. Plaintiff is informed and believes and thereupon alleges that within the 90 days preceding the relevant transferor’s petition date, Defendant received transfers totaling not less than the amount set forth on Exhibit B 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 B.

23. Plaintiff is informed and believes and thereupon alleges that within the two years preceding the Initial Petition Date, Defendant received transfers totaling not less than the amount set forth on Exhibit B 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 B.

24. Plaintiff is informed and believes and thereupon alleges that within the four years preceding the Initial Petition Date, Defendant received transfers totaling not less than the amount set forth on Exhibit B 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 B.

### **FIRST CLAIM FOR RELIEF**

#### **Avoidance and Recovery of Preferential Transfers**

25. Plaintiff realleges and incorporates herein Paragraphs 1 through 24, as if fully set forth herein.

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



27. The 90 Day Transfers were made to or for the benefit of Defendant 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).

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

29. 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 Defendant, (b) directing that the 90 Day Transfers be set aside, and (c) recovering the 90 Day Transfers or the value thereof from Defendant for the benefit of the Liquidation Trust.

### **SECOND CLAIM FOR RELIEF**

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

30. Plaintiff realleges and incorporates herein Paragraphs 1 through 29, as if fully set forth herein.

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

32. 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.

33. The Two Year Transfers were made to or for the benefit of Defendant.

34. 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 Defendant, (b) directing that the Two Year Transfers be set aside, and (c) recovering such Two Year Transfers or the value thereof from Defendant for the benefit of the Liquidation Trust.

### **THIRD CLAIM FOR RELIEF**

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

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

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

37. 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.

38. The Two Year Transfers were made to or for the benefit of Defendant.

39. 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 Defendant, (b) directing that the Two Year Transfers be set aside, and (c) recovering such Two Year Transfers or the value thereof from Defendant for the benefit of the Liquidation Trust.

**FOURTH CLAIM FOR RELIEF**

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

40. Plaintiff realleges and incorporates herein Paragraphs 1 through 39, as if fully set forth herein.

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

42. 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.

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

44. 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.

45. 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).

46. 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 Defendant for the benefit of the Liquidation Trust.

**FIFTH CLAIM FOR RELIEF**

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

47. Plaintiff realleges and incorporates herein Paragraphs 1 through 46, as if fully set forth herein.

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

49. 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.

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

51. 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.

52. 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).

53. 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 Defendant for the benefit of the Liquidation Trust.

### **SIXTH CLAIM FOR RELIEF**

#### **Objection to Claims (Bankruptcy Code Section 502(d))**

54. Plaintiff realleges and incorporates herein Paragraphs 1 through 53, as if fully set forth herein.

55. The Claims are not allowable because:

- a. Defendant received property, i.e., the Transfers, recoverable under Bankruptcy Code section 550; and/or
- b. Defendant received a transfer, i.e., the Transfers, avoidable under Bankruptcy Code section 544, 547, or 548.

56. In either event, the Claims must be disallowed under Bankruptcy Code section 502(d) unless and until Defendant has fully repaid the amount, or turned over any such property, for which Defendant is liable under Bankruptcy Code section 550.

### **SEVENTH CLAIM FOR RELIEF**

#### **Equitable Subordination of Claims**

57. Plaintiff realleges and incorporates herein Paragraphs 1 through 56, as if fully set forth herein.

58. By providing services that helped perpetuate a Ponzi scheme, Defendant engaged in inequitable conduct.

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

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

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

62. As a result of the foregoing, Plaintiff is entitled to judgment pursuant to Bankruptcy Code section 510(c) equitably subordinating any and all claims that Defendant may assert against any of the Debtors, whatever the origin of those claims, including, without limitation, the Claims and any claims that may be asserted under Bankruptcy Code section 502(h), to all other claims against the Debtors.

### **EIGHTH CLAIM FOR RELIEF**

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

63. Plaintiff realleges and incorporates herein Paragraphs 1 through 62, as if fully set forth herein.

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

65. 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.

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

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

68. 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's violations of Section 5(a) and 5(c) of the Securities Act.

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

### **NINTH CLAIM FOR RELIEF**

#### **Fraud**

70. Plaintiff realleges and incorporates herein Paragraphs 1 through 69, as if fully set forth herein.

71. Defendant 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.

72. 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.

73. Defendant made these misrepresentations knowingly, with scienter, and with intent to defraud Investors.

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

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

### **TENTH CLAIM FOR RELIEF**

#### **Aiding and Abetting Fraud**

76. Plaintiff realleges and incorporates herein Paragraphs 1 through 75, as if fully set forth herein.

77. 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.



78. Defendant knowingly and substantially assisted Shapiro in defrauding Investors.

79. Defendant was aware of Shapiro's fraud and acted knowingly in providing substantial and material assistance to Shapiro.

80. Defendant substantially benefited by receiving income, commissions, and bonuses.

81. As a result of the foregoing, Plaintiff is entitled to judgment holding Defendant liable for aiding and abetting fraud, as set forth in Exhibit C, 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 claim for relief, (a) avoiding the 90 Day Transfers free and clear of any interest of Defendant, (b) directing that the 90 Day Transfers be set aside, and (c) ordering Defendant to pay to Plaintiff \$44,925.00;
- (2) On the second and third claims for relief, (a) avoiding the Two Year Transfers free and clear of any claimed interest of Defendant, (b) directing that the Two Year Transfers be set aside, and (c) ordering Defendant to pay to Plaintiff \$467,666.20;
- (3) On the fourth and fifth 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, (c) ordering Defendant to pay to Plaintiff \$579,944.03;
- (4) On the sixth claim for relief, sustaining the objection to the Claims, decreeing that Defendant take nothing therefrom, and directing the Claims Agent to strike the Schedule F claims from the official Claims Register as set forth in more detail in Exhibit A;
- (5) On the seventh claim for relief, equitably subordinating any and all claims that Defendant may assert against any of the Debtors or their estates, whatever the origin of those claims, including, without limitation, the Claim and any claims that may be asserted under Bankruptcy Code section 502(h), to all other claims against the Debtors or their estates

- (6) On the eighth claim for relief, holding Defendant liable for damages, in the amount of \$6,292,088.11 for sale of Notes and/or Units as set forth in Exhibit C, or in an amount to be proven at trial, arising from Defendant's sale of unregistered securities;
- (7) On the ninth claim for relief, holding Defendant liable for fraud, for \$6,292,088.11 for sale of Notes and/or Units as set forth in Exhibit C in an amount to be proven at trial;
- (8) On the tenth claim for relief, holding Defendant liable for aiding and abetting fraud, in the amount of \$6,292,088.11 for sale of Notes and/or Units as set forth in Exhibit C, or in an amount to be proven at trial; and
- (9) 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**  
**Scheduled and Filed Claims**

<b>Creditor</b>	<b>Scheduled Claims</b>			<b>Filed Claims</b>		
	<b>Schedule</b>	<b>Amount</b>	<b>C/U/D</b>	<b>Claim No.</b>	<b>Amount</b>	<b>Classification</b>
Dan Reisinger	F	\$7,975.00	C/U/D			
<b>Totals</b>		<b>\$7,975.00</b>			<b>\$0.00</b>	

## Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBRIIDGE GROUP OF COMPANIES, LLC	28581	12/04/17	11/22/17	DAN REISINGER		\$ 4,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	28496	12/04/17	11/22/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	28312	12/04/17	11/07/17	DAN REISINGER		2,400.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	28264	12/04/17	11/07/17	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27745	12/04/17	10/18/17	DAN REISINGER		6,180.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27422	12/04/17	10/11/17	DAN REISINGER		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27347	12/04/17	10/11/17	DAN REISINGER		1,180.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27296	12/04/17	10/11/17	DAN REISINGER	\$ 1,333.33	
WOODBRIIDGE GROUP OF COMPANIES, LLC	27296	12/04/17	10/11/17	DAN REISINGER	833.33	
WOODBRIIDGE GROUP OF COMPANIES, LLC	27296	12/04/17	10/11/17	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27297	12/04/17	10/11/17	DAN REISINGER	1,750.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	27297	12/04/17	10/11/17	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27176	12/04/17	10/11/17	DAN REISINGER	2,666.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	27176	12/04/17	10/11/17	DAN REISINGER	1,666.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	27176	12/04/17	10/11/17	DAN REISINGER		6,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27221	12/04/17	10/11/17	DAN REISINGER		2,400.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	27222	12/04/17	10/11/17	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	26997	12/04/17	10/06/17	DAN REISINGER		1,800.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	26835	12/04/17	09/25/17	DAN REISINGER		2,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	26549	12/04/17	09/25/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	26550	12/04/17	09/25/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	26222	12/04/17	09/21/17	DAN REISINGER		860.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	24298	12/04/17	09/14/17	DAN REISINGER	750.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	24298	12/04/17	09/14/17	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	25880	12/04/17	09/05/17	DAN REISINGER		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	25881	12/04/17	09/05/17	DAN REISINGER		2,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	25929	12/04/17	09/05/17	DAN REISINGER		3,780.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	25820	12/04/17	09/05/17	DAN REISINGER	1,625.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	25820	12/04/17	09/05/17	DAN REISINGER		1,950.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	25834	12/04/17	09/05/17	DAN REISINGER	1,000.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	25834	12/04/17	09/05/17	DAN REISINGER	500.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	25834	12/04/17	09/05/17	DAN REISINGER		2,000.00
TOTALS - 90 DAY					12,125.00	57,050.00
NET DISBURSEMENTS - 90 DAY						44,925.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	25399	12/04/17	08/29/17	DAN REISINGER		1,020.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	24491	12/04/17	08/07/17	DAN REISINGER		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23539	12/04/17	07/26/17	DAN REISINGER	250.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	23539	12/04/17	07/26/17	DAN REISINGER		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23540	12/04/17	07/26/17	DAN REISINGER	750.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	23540	12/04/17	07/26/17	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23431	12/04/17	07/26/17	DAN REISINGER		2,320.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23432	12/04/17	07/26/17	DAN REISINGER		1,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23278	12/04/17	07/18/17	DAN REISINGER		2,400.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23279	12/04/17	07/18/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	23321	12/04/17	07/18/17	DAN REISINGER		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22885	12/04/17	07/12/17	DAN REISINGER		5,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22883	12/04/17	07/10/17	DAN REISINGER	8,800.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	22883	12/04/17	07/10/17	DAN REISINGER		15,840.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22884	12/04/17	07/10/17	DAN REISINGER		11,831.48
WOODBRIIDGE GROUP OF COMPANIES, LLC	22701	12/04/17	07/03/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22355	12/04/17	06/23/17	DAN REISINGER		2,580.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22356	12/04/17	06/23/17	DAN REISINGER		1,520.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22396	12/04/17	06/23/17	DAN REISINGER		1,950.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	22086	12/04/17	06/15/17	DAN REISINGER		1,815.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	21928	12/04/17	06/13/17	DAN REISINGER		1,109.50
WOODBRIIDGE GROUP OF COMPANIES, LLC	21929	12/04/17	06/13/17	DAN REISINGER		1,680.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	21559	12/04/17	05/30/17	DAN REISINGER		7,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	21560	12/04/17	05/30/17	DAN REISINGER		4,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	21514	12/04/17	05/30/17	DAN REISINGER		1,950.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	21515	12/04/17	05/30/17	DAN REISINGER		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	20737	12/04/17	05/08/17	DAN REISINGER	1,000.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	20737	12/04/17	05/08/17	DAN REISINGER		2,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	20507	12/04/17	05/03/17	DAN REISINGER	2,166.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	20507	12/04/17	05/03/17	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	20508	12/04/17	05/03/17	DAN REISINGER	4,333.33	
WOODBRIIDGE GROUP OF COMPANIES, LLC	20508	12/04/17	05/03/17	DAN REISINGER		6,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	20391	12/04/17	05/03/17	DAN REISINGER		3,000.00

## Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBRIIDGE GROUP OF COMPANIES, LLC	20223	12/04/17	04/24/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	19773	12/04/17	04/10/17	DAN REISINGER	3,266.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	19773	12/04/17	04/10/17	DAN REISINGER		4,200.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	19054	12/04/17	03/20/17	DAN REISINGER		6,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	18806	12/04/17	03/20/17	DAN REISINGER		375.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	18806	12/04/17	03/20/17	DAN REISINGER		62.50
WOODBRIIDGE GROUP OF COMPANIES, LLC	18797	12/04/17	03/10/17	DAN REISINGER		1,200.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	18738	12/04/17	03/10/17	DAN REISINGER		637.50
WOODBRIIDGE GROUP OF COMPANIES, LLC	18739	12/04/17	03/10/17	DAN REISINGER		3,710.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	18685	12/04/17	03/10/17	DAN REISINGER	900.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	18685	12/04/17	03/10/17	DAN REISINGER		3,600.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	17591	12/04/17	02/07/17	DAN REISINGER		1,700.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	17592	12/04/17	02/07/17	DAN REISINGER		3,600.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	17593	12/04/17	02/07/17	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	17219	12/04/17	01/30/17	DAN REISINGER		5,600.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	16764	12/04/17	01/17/17	DAN REISINGER	1,250.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	16764	12/04/17	01/17/17	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	16405	12/04/17	01/10/17	DAN REISINGER	1,875.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	16405	12/04/17	01/10/17	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15308	12/04/17	12/02/16	DAN REISINGER	500.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	15308	12/04/17	12/02/16	DAN REISINGER		1,090.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15309	12/04/17	12/02/16	DAN REISINGER		4,200.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15010	12/04/17	11/22/16	DAN REISINGER		6,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15011	12/04/17	11/22/16	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15012	12/04/17	11/22/16	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15013	12/04/17	11/22/16	DAN REISINGER		1,305.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	15014	12/04/17	11/22/16	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14663	12/04/17	11/18/16	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14302	12/04/17	11/04/16	DAN REISINGER		15,840.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14303	12/04/17	11/03/16	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14304	12/04/17	11/03/16	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14305	12/04/17	11/03/16	DAN REISINGER		750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14141	12/04/17	10/28/16	DAN REISINGER		2,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	14018	12/04/17	10/25/16	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	13874	12/04/17	10/20/16	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	13875	12/04/17	10/20/16	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	13677	12/04/17	10/17/16	DAN REISINGER		8,910.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	10096	12/04/17	09/22/16	DAN REISINGER		3,750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	9881	12/04/17	09/21/16	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	9548	12/04/17	09/06/16	DAN REISINGER		7,035.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	9393	12/04/17	08/30/16	DAN REISINGER		9,030.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	9161	12/04/17	08/23/16	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8954	12/04/17	08/22/16	DAN REISINGER		6,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8281	12/04/17	08/08/16	DAN REISINGER	1,500.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	8281	12/04/17	08/08/16	DAN REISINGER		2,250.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	8027	12/04/17	07/26/16	DAN REISINGER		1,400.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7762	12/04/17	07/22/16	DAN REISINGER		4,970.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7763	12/04/17	07/22/16	DAN REISINGER		8,750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7611	12/04/17	07/22/16	DAN REISINGER		5,320.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7567	12/04/17	07/22/16	DAN REISINGER	400.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	7567	12/04/17	07/22/16	DAN REISINGER		1,890.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7417	12/04/17	07/22/16	DAN REISINGER		3,850.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7300	12/04/17	07/20/16	DAN REISINGER	430.21	
WOODBRIIDGE GROUP OF COMPANIES, LLC	7300	12/04/17	07/20/16	DAN REISINGER	172.08	
WOODBRIIDGE GROUP OF COMPANIES, LLC	7300	12/04/17	07/20/16	DAN REISINGER		885.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	7090	12/04/17	06/27/16	DAN REISINGER		1,800.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6732	12/04/17	06/22/16	DAN REISINGER		3,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6381	12/04/17	06/13/16	DAN REISINGER		810.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6287	12/04/17	06/13/16	DAN REISINGER		1,750.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6250	12/04/17	06/13/16	DAN REISINGER	5,250.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	6250	12/04/17	06/13/16	DAN REISINGER		7,000.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	6044	12/04/17	06/06/16	DAN REISINGER		1,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	5864	12/04/17	06/06/16	DAN REISINGER	1,680.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	5864	12/04/17	06/06/16	DAN REISINGER	600.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	5864	12/04/17	06/06/16	DAN REISINGER		7,500.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	5423	12/04/17	05/24/16	DAN REISINGER	690.00	
WOODBRIIDGE GROUP OF COMPANIES, LLC	5423	12/04/17	05/24/16	DAN REISINGER		920.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	5424	12/04/17	05/24/16	DAN REISINGER	1,546.67	
WOODBRIIDGE GROUP OF COMPANIES, LLC	5424	12/04/17	05/24/16	DAN REISINGER		2,320.00
WOODBRIIDGE GROUP OF COMPANIES, LLC	5567	12/04/17	05/23/16	DAN REISINGER		14,560.00

## Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE GROUP OF COMPANIES, LLC	5015	12/04/17	05/13/16	DAN REISINGER		15,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	5103	12/04/17	05/12/16	DAN REISINGER		79.99
WOODBIDGE GROUP OF COMPANIES, LLC	4069	12/04/17	05/12/16	DAN REISINGER		25,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	4827	12/04/17	05/03/16	DAN REISINGER		1,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	4525	12/04/17	04/25/16	DAN REISINGER		1,125.00
WOODBIDGE GROUP OF COMPANIES, LLC	4526	12/04/17	04/25/16	DAN REISINGER		1,815.00
WOODBIDGE GROUP OF COMPANIES, LLC	4117	12/04/17	04/20/16	DAN REISINGER		15,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	4065	12/04/17	04/14/16	DAN REISINGER		15,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	4064	12/04/17	04/13/16	DAN REISINGER		7,500.00
WOODBIDGE GROUP OF COMPANIES, LLC	4066	12/04/17	04/13/16	DAN REISINGER		1,750.00
WOODBIDGE GROUP OF COMPANIES, LLC	4067	12/04/17	04/13/16	DAN REISINGER		13,014.62
WOODBIDGE GROUP OF COMPANIES, LLC	4063	12/04/17	04/11/16	DAN REISINGER		4,500.00
WOODBIDGE GROUP OF COMPANIES, LLC	4028	12/04/17	04/07/16	DAN REISINGER		1,680.00
WOODBIDGE GROUP OF COMPANIES, LLC	3897	12/04/17	04/07/16	DAN REISINGER		2,400.00
WOODBIDGE GROUP OF COMPANIES, LLC	3898	12/04/17	04/04/16	DAN REISINGER		5,100.00
WOODBIDGE GROUP OF COMPANIES, LLC	3802	12/04/17	04/04/16	DAN REISINGER		1,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	3718	12/04/17	03/29/16	DAN REISINGER		2,250.00
WOODBIDGE GROUP OF COMPANIES, LLC	3598	12/04/17	03/21/16	DAN REISINGER		4,500.00
WOODBIDGE GROUP OF COMPANIES, LLC	3529	12/04/17	03/21/16	DAN REISINGER		2,250.00
WOODBIDGE GROUP OF COMPANIES, LLC	3312	12/04/17	03/14/16	DAN REISINGER	4,666.67	
WOODBIDGE GROUP OF COMPANIES, LLC	3312	12/04/17	03/14/16	DAN REISINGER		5,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	2901	12/04/17	03/07/16	DAN REISINGER		1,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	2902	12/04/17	03/07/16	DAN REISINGER		1,600.00
WOODBIDGE GROUP OF COMPANIES, LLC	2721	12/04/17	02/29/16	DAN REISINGER		1,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	2775	12/04/17	02/29/16	DAN REISINGER		7,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	2690	12/04/17	02/29/16	DAN REISINGER	750.00	
WOODBIDGE GROUP OF COMPANIES, LLC	2690	12/04/17	02/29/16	DAN REISINGER		1,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	2442	12/04/17	02/25/16	DAN REISINGER		1,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	2443	12/04/17	02/25/16	DAN REISINGER		2,240.00
WOODBIDGE GROUP OF COMPANIES, LLC	2444	12/04/17	02/25/16	DAN REISINGER		2,380.00
WOODBIDGE GROUP OF COMPANIES, LLC	2043	12/04/17	02/08/16	DAN REISINGER		2,520.00
WOODBIDGE GROUP OF COMPANIES, LLC	2044	12/04/17	02/08/16	DAN REISINGER		2,100.00
WOODBIDGE GROUP OF COMPANIES, LLC	2066	12/04/17	02/08/16	DAN REISINGER	860.42	
WOODBIDGE GROUP OF COMPANIES, LLC	2066	12/04/17	02/08/16	DAN REISINGER		1,032.50
WOODBIDGE GROUP OF COMPANIES, LLC	1904	12/04/17	02/08/16	DAN REISINGER		800.00
WOODBIDGE GROUP OF COMPANIES, LLC	1835	12/04/17	02/01/16	DAN REISINGER	500.00	
WOODBIDGE GROUP OF COMPANIES, LLC	1835	12/04/17	02/01/16	DAN REISINGER	166.67	
WOODBIDGE GROUP OF COMPANIES, LLC	1835	12/04/17	02/01/16	DAN REISINGER		2,000.00
WOODBIDGE GROUP OF COMPANIES, LLC	1792	12/04/17	02/01/16	DAN REISINGER		920.00
WOODBIDGE GROUP OF COMPANIES, LLC	1654	12/04/17	01/29/16	DAN REISINGER		2,320.00
WOODBIDGE GROUP OF COMPANIES, LLC	1523	12/04/17	01/27/16	DAN REISINGER		4,050.00
WOODBIDGE GROUP OF COMPANIES, LLC	1237	12/04/17	01/15/16	DAN REISINGER		900.00
WOODBIDGE GROUP OF COMPANIES, LLC	1118	12/04/17	01/15/16	DAN REISINGER		1,500.00
WOODBIDGE GROUP OF COMPANIES, LLC	1119	12/04/17	01/15/16	DAN REISINGER		1,032.50
WOODBIDGE STRUCTURED FUNDING, LLC	33733	12/04/17	01/04/16	DAN REISINGER		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	33452	12/04/17	12/14/15	DAN REISINGER		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	33468	12/04/17	12/14/15	DAN REISINGER		7,800.00
WOODBIDGE STRUCTURED FUNDING, LLC	33338	12/04/17	12/14/15	DAN REISINGER		1,200.00
WOODBIDGE STRUCTURED FUNDING, LLC	33127	12/04/17	12/08/15	DAN REISINGER	910.00	
WOODBIDGE STRUCTURED FUNDING, LLC	33127	12/04/17	12/08/15	DAN REISINGER		1,560.00
WOODBIDGE STRUCTURED FUNDING, LLC	33128	12/04/17	12/08/15	DAN REISINGER	1,200.00	
WOODBIDGE STRUCTURED FUNDING, LLC	33128	12/04/17	12/08/15	DAN REISINGER		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	33203	12/04/17	12/07/15	DAN REISINGER		1,000.00
TOTALS - 2 YEAR (INCL. 90 DAY)					58,539.39	526,205.59
NET DISBURSEMENTS - 2 YEAR (INCL. 90 DAY)						467,666.20
WOODBIDGE STRUCTURED FUNDING, LLC	32895	12/04/17	11/23/15	DAN REISINGER		3,540.00
WOODBIDGE STRUCTURED FUNDING, LLC	32874	12/04/17	11/16/15	DAN REISINGER		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	32875	12/04/17	11/16/15	DAN REISINGER		1,750.00
WOODBIDGE STRUCTURED FUNDING, LLC	32927	12/04/17	11/16/15	DAN REISINGER	4,500.00	
WOODBIDGE STRUCTURED FUNDING, LLC	32927	12/04/17	11/16/15	DAN REISINGER		6,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	32755	12/04/17	11/16/15	DAN REISINGER		1,260.00
WOODBIDGE STRUCTURED FUNDING, LLC	32757	12/04/17	11/16/15	DAN REISINGER	1,166.67	
WOODBIDGE STRUCTURED FUNDING, LLC	32757	12/04/17	11/16/15	DAN REISINGER	1,166.67	
WOODBIDGE STRUCTURED FUNDING, LLC	32757	12/04/17	11/16/15	DAN REISINGER		2,800.00
WOODBIDGE STRUCTURED FUNDING, LLC	32555	12/04/17	11/02/15	DAN REISINGER		875.00
WOODBIDGE STRUCTURED FUNDING, LLC	32528	12/04/17	10/28/15	DAN REISINGER		62.50
WOODBIDGE STRUCTURED FUNDING, LLC	32490	12/04/17	10/28/15	DAN REISINGER		2,250.00

## Commission Payments

Debtor	Ck. No.	Petition Date	Clear Date	Name	Receipts	Disbursements
WOODBIDGE STRUCTURED FUNDING, LLC	32397	12/04/17	10/22/15	DAN REISINGER		2,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	32279	12/04/17	10/22/15	DAN REISINGER		1,090.00
WOODBIDGE STRUCTURED FUNDING, LLC	32233	12/04/17	10/09/15	DAN REISINGER		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	32234	12/04/17	10/09/15	DAN REISINGER		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31764	12/04/17	09/21/15	DAN REISINGER		1,350.00
WOODBIDGE STRUCTURED FUNDING, LLC	31765	12/04/17	09/21/15	DAN REISINGER		2,250.00
WOODBIDGE STRUCTURED FUNDING, LLC	31777	12/04/17	09/21/15	DAN REISINGER	1,633.33	
WOODBIDGE STRUCTURED FUNDING, LLC	31777	12/04/17	09/21/15	DAN REISINGER		2,800.00
WOODBIDGE STRUCTURED FUNDING, LLC	31808	12/04/17	09/17/15	DAN REISINGER		1,925.00
WOODBIDGE STRUCTURED FUNDING, LLC	31699	12/04/17	09/01/15	DAN REISINGER		6,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31611	12/04/17	08/19/15	DAN REISINGER	2,250.00	
WOODBIDGE STRUCTURED FUNDING, LLC	31611	12/04/17	08/19/15	DAN REISINGER		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31423	12/04/17	08/12/15	DAN REISINGER		1,028.66
WOODBIDGE STRUCTURED FUNDING, LLC	31382	12/04/17	07/20/15	DAN REISINGER	1,600.00	
WOODBIDGE STRUCTURED FUNDING, LLC	31382	12/04/17	07/20/15	DAN REISINGER		12,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31334	12/04/17	07/20/15	DAN REISINGER		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31278	12/04/17	07/09/15	DAN REISINGER		1,560.00
WOODBIDGE STRUCTURED FUNDING, LLC	31279	12/04/17	07/09/15	DAN REISINGER		1,750.00
WOODBIDGE STRUCTURED FUNDING, LLC	31164	12/04/17	06/29/15	DAN REISINGER		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31086	12/04/17	06/23/15	DAN REISINGER		5,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31087	12/04/17	06/23/15	DAN REISINGER		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	31078	12/04/17	06/19/15	DAN REISINGER		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	31059	12/04/17	06/18/15	DAN REISINGER		4,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	31006	12/04/17	06/08/15	DAN REISINGER		3,800.00
WOODBIDGE STRUCTURED FUNDING, LLC	30954	12/04/17	06/01/15	DAN REISINGER	1,000.00	
WOODBIDGE STRUCTURED FUNDING, LLC	30954	12/04/17	06/01/15	DAN REISINGER	1,000.00	
WOODBIDGE STRUCTURED FUNDING, LLC	30954	12/04/17	06/01/15	DAN REISINGER		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	30917	12/04/17	06/01/15	DAN REISINGER	2,200.00	
WOODBIDGE STRUCTURED FUNDING, LLC	30917	12/04/17	06/01/15	DAN REISINGER		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	30834	12/04/17	05/18/15	DAN REISINGER		3,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	30819	12/04/17	05/18/15	DAN REISINGER		7,960.00
WOODBIDGE STRUCTURED FUNDING, LLC	30779	12/04/17	05/08/15	DAN REISINGER		377.33
WOODBIDGE STRUCTURED FUNDING, LLC	30780	12/04/17	05/08/15	DAN REISINGER		166.67
WOODBIDGE STRUCTURED FUNDING, LLC	30689	12/04/17	04/27/15	DAN REISINGER		2,400.00
WOODBIDGE STRUCTURED FUNDING, LLC	30660	12/04/17	04/27/15	DAN REISINGER		1,026.67
WOODBIDGE STRUCTURED FUNDING, LLC	30607	12/04/17	04/27/15	DAN REISINGER		1,600.00
WOODBIDGE STRUCTURED FUNDING, LLC	30529	12/04/17	04/15/15	DAN REISINGER		2,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	30530	12/04/17	04/15/15	DAN REISINGER		3,760.00
WOODBIDGE STRUCTURED FUNDING, LLC	30531	12/04/17	04/15/15	DAN REISINGER		1,000.00
WOODBIDGE STRUCTURED FUNDING, LLC	30532	12/04/17	04/15/15	DAN REISINGER		754.67
WOODBIDGE STRUCTURED FUNDING, LLC	30446	12/04/17	04/03/15	DAN REISINGER		2,800.00
WOODBIDGE STRUCTURED FUNDING, LLC	30386	12/04/17	03/23/15	DAN REISINGER		1,680.00
WOODBIDGE STRUCTURED FUNDING, LLC	5452	12/04/17	02/25/15	DAN REISINGER		4,528.00
WOODBIDGE STRUCTURED FUNDING, LLC	5453	12/04/17	02/25/15	DAN REISINGER		800.00
TOTALS - 4 YEAR (INCL. 2 YEAR AND 90 DAY)					\$ 75,056.06	\$ 655,000.09
NET DISBURSEMENTS - 4 YEAR (INCL. 2 YEAR AND 90 DAY)					\$	579,944.03

## Schedule of Claims Contributed by Investors

Broker(s): Dan Reisinger

Investor Name	Outstanding Investor Principal Amounts		Net/Allowed Claim Amounts	
	Class 3	Class 5	Class 3	Class 5
ANDREW P & ROBIN L S TAYLOR	\$ 50,000.00	\$ -	\$ 45,497.17	\$ -
CHARLES L & KAREN S DOW	60,000.00	-	56,526.67	-
CRAIG A MCFOY	700,000.00	300,000.00	609,233.32	261,100.00
DELAWARE ASSOCIATION OF REALTORS INC	50,000.00	-	48,791.67	-
DENISE B EDWARDS	43,000.00	-	42,448.17	-
EDWARD C QUINN	60,000.00	-	58,883.33	-
ELSWORTH L & SUSAN M BUSHNELL	31,700.00	-	28,081.13	-
GREGORY J & REGINA SPADEA	100,000.00	-	83,651.01	-
IRA SVCS TR CO-CFBO JOHN K SEMON IRA	42,000.00	-	36,370.83	-
IRA SVCS TR CO-CFBO SANDRA MIDASH IRA	208,000.00	-	179,330.42	-
JOHN & SANDRA MIDASH	-	200,000.00	-	155,777.94
JUDITH A DICAMILLO	75,000.00	-	73,910.68	-
KATHERYN A MADDOCKS	25,000.00	-	22,053.51	-
LOUISE WILDS	83,000.00	-	71,028.25	-
MARION I DAVIS	100,000.00	-	95,594.42	-
PAUL P PITRIZZI	40,000.00	-	36,383.27	-
PROV. TR GP-FBO CAROLYN S MILLER IRA	123,000.00	-	101,684.33	-
PROV. TR GP-FBO CHERYL A MACEY IRA	203,000.00	-	199,960.56	-
PROV. TR GP-FBO CRAIG A MCFOY IRA	264,000.00	-	238,460.33	-
PROV. TR GP-FBO DAWN WALKER IRA	192,000.00	-	184,654.26	-
PROV. TR GP-FBO DENNIS J CONNOLLY IRA	100,000.00	-	88,877.77	-
PROV. TR GP-FBO DIANE M GRAHAM IRA	60,000.00	-	54,346.66	-
PROV. TR GP-FBO GREGORY J SPADEA IRA	79,500.00	-	68,367.08	-
PROV. TR GP-FBO GREGORY MOTUS IRA	102,000.00	-	83,890.08	-
PROV. TR GP-FBO JAMES RUSSELL BRANNAN IRA	50,000.00	-	43,676.44	-
PROV. TR GP-FBO JOAN E BOYLE IRA	125,000.00	-	107,989.61	-
PROV. TR GP-FBO JOAN PEPPER IRA	25,500.00	-	24,044.37	-
PROV. TR GP-FBO KEVIN J HAYES IRA	93,500.00	-	82,846.05	-
PROV. TR GP-FBO LISA M JACKSON ROTH IRA	67,000.00	-	60,127.79	-
PROV. TR GP-FBO MICHELE D FONTANA IRA	100,000.00	-	94,556.01	-
PROV. TR GP-FBO MICHELE FONTANA IRA	50,000.00	-	35,032.67	-
PROV. TR GP-FBO MITCHELL A JACKSON IRA	60,000.00	-	50,910.98	-
PROV. TR GP-FBO MITCHELL JACKSON ROTH IRA	76,000.00	-	68,568.05	-
PROV. TR GP-FBO STEPHEN M BOYLE IRA	71,000.00	-	62,025.84	-
PROV. TR GP-FBO STEPHEN W MILLER IRA	-	156,000.00	-	115,747.50
PROV. TR GP-FBO TODD A MCFOY IRA	248,500.00	-	231,276.75	-
PROV. TR GP-FBO VINCENT SCURTI JR IRA	34,000.00	-	33,393.67	-
PROV. TR GP-FBO WADE MEADOWS JR IRA	100,500.00	-	93,230.50	-
RALPH C & KATHERYN A MADDOCKS	100,000.00	-	88,077.33	-
RALPH MADDOCKS	60,000.00	-	55,276.61	-
REAL ESTATE PLUS INC	175,000.00	-	161,069.51	-
RICHARD W CROSSAN TR	50,000.00	-	50,000.00	-
ROXANNE T CAIN	473,259.02	-	425,768.78	-
STEPHEN & JOAN BOYLE	70,000.00	-	60,063.83	-
THE NEW CASTLE CNTY BOARD OF REALTORS	200,000.00	-	185,367.35	-
TODD A MCFOY	500,000.00	300,000.00	397,185.12	238,311.07
WILLIAM B KING	240,000.00	-	215,142.51	-
WILLIAM F BLEVINS	200,000.00	-	177,863.96	-
WILLIAM L HOLDEN JR	240,000.00	-	209,632.95	-
Totals	\$ 6,200,459.02	\$ 956,000.00	\$ 5,521,151.60	\$ 770,936.51