## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 1:16-cv-10524-RGS

MARK A. JONES,

Defendant.

# PLAINTIFF'S MEMORANDUM IN SUPPORT OF ITS MOTION FOR AN ORDER APPROVING THE FINAL ACCOUNTING, DISCHARGING THE DISTRIBUTION AGENT, AND RELATED RELIEF

Plaintiff Securities and Exchange Commission ("SEC") respectfully submits this memorandum in support of its Motion for an Order Approving the Final Accounting, Discharging the Distribution Agent, and Related Relief (the "Motion"). This relief, if granted, will close the distribution in this matter.

#### I. <u>BACKGROUND</u>

#### A. The SEC Action

On March 15, 2016, the SEC filed a Complaint against Mark A. Jones ("Jones") accompanied by a motion seeking an asset freeze and other emergency relief. Dkt. Nos. 1, 2. The SEC alleged that, between 2007 and 2015, Jones raised nearly \$10 million through a fraudulent offering of securities in an enterprise called "The Bridge Fund". According to the Complaint, Jones told investors that he would pool their money to provide short-term bridge loans to Jamaican companies that had been approved for commercial bank loans but were

awaiting funding. The SEC alleged that, in fact, Jones used the money for personal expenses and to make payments to other investors. By Order entered on March 15, 2016, this Court froze Jones's assets and granted other emergency relief. Dkt. No. 6.

On March 7, 2017, upon motion of the SEC, the Clerk of Court entered default as to Jones. Dkt. No. 23. On March 28, 2017, this Court entered default judgment against Jones (the "Final Judgment"), ordering him to pay to the SEC disgorgement of \$3,586,510, prejudgment interest of \$236,463.48, and a civil penalty of \$160,000. Dkt. No. 29. In the Final Judgment, the Court ordered the SEC to hold the funds pending the submission and approval of a distribution plan.

#### **B.** The Distribution Fund

Collection efforts on the Final Judgment and the accrual of interest resulted in a distribution fund of approximately \$610,000 (the "Distribution Fund"). Prior to distribution, approximately \$566,000 of the Distribution Fund resided in an interest-bearing account at U.S. Treasury's Bureau of Fiscal Service (the "BFS Account"), with an additional approximately \$44,000 held at the U.S. Treasury as post-judgment interest (the "Post Judgment Interest").

#### C. <u>The Distribution</u>

By Order dated January 9, 2018 (the "January Order"), this Court appointed the undersigned as Distribution Agent and approved the SEC's proposed distribution plan (the "Plan"). Dkt. No. 42. In the January Order, the Court directed the SEC to include in the Distribution Fund all amounts it held in this action, including, if allowed by law, the Post Judgment Interest. Because inclusion of the Post Judgment Interest component of the Distribution Fund would delay distribution, the Distribution Agent decided to distribute the funds in the BFS Account immediately and distribute the Post Judgment Interest upon its return

from the U.S. Treasury. Pursuant to the Plan, beginning in September 2018, the Distribution Agent disbursed \$556,416.59 to Eligible Harmed Investors, <sup>1</sup> representing the amount held in the BFS Account less Administrative Costs.

In the spring 2019, the SEC recovered the Post Judgment Interest from the U.S. Treasury and distributed an additional \$43,793.91 to Eligible Harmed Investors pursuant to the Plan.

In total, the SEC distributed \$600,210.50 to Eligible Harmed Investors. The Distribution Agent monitored the status of all payments issued, resulting in the distribution of all \$600,210.50 to the intended recipients.

### II. THE DISTRIBUTION IS COMPLETE AND THE DISTRIBUTION FUND IS ELIGIBLE FOR TERMINATION

As further described on the Final Accounting, the Distribution Fund began with \$606,300.04 and earned \$4,217.70 in interest, for a total balance of \$610,517.74. *See* Exhibit A, p. 1. The Distribution Agent oversaw the distribution of \$600,210.50 to the Eligible Harmed Investors and the payment of \$5,669.25 in Administrative Costs. The Distribution Fund currently resides in the BFS Account and holds \$4,637.99. The Distribution Agent anticipates a final invoice from the Tax Administrator of approximately \$2,700, leaving approximately \$2,000 in the BFS Account.<sup>2</sup>

Upon completion of all distributions under the Plan, the Plan provides that the Distribution Agent shall file a final accounting with the Court and seek an Order directing the SEC to remit any residual to the U.S. Treasury, and discharging the Distribution Agent. Dkt. No. 33-1, ¶ 13. Insofar as the distribution is now complete, the SEC respectfully requests that the

<sup>&</sup>lt;sup>1</sup> Capitalized terms not otherwise defined herein are defined in the Plan.

<sup>&</sup>lt;sup>2</sup> The Distribution Agent considered and rejected distribution of the residual pursuant to the Plan in view of the additional Administrative Costs that would be incurred by leaving the Distribution Fund open another year.

Court approve the final accounting included as Exhibit A to this memorandum; direct the SEC to transfer all funds remaining in the Distribution Fund after payment of the Tax Administrator to the general fund of the U.S. Treasury subject to Section 21F(g)(3) of the Exchange Act;<sup>3</sup> direct any funds returned to the Distribution Fund in the future to the SEC for remittance to the general fund of the U.S. Treasury subject to Section 21F(g)(3) of the Exchange Act; and discharge the Distribution Agent.

#### III. <u>CONCLUSION</u>

For the reasons set forth above, the SEC respectfully requests that the Court grant the requested relief.

Dated: October 18, 2019

Respectfully submitted,

/s/ Catherine E. Pappas
Catherine E. Pappas (PA Bar No. 56544)
Attorney for Plaintiff
SECURITIES AND EXCHANGE
COMMISSION
One Penn Center
1617 JFK Blvd., Ste. 520
Philadelphia, Pa. 19103
Tel: 215-597-0657

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Attachment: Exhibit A (final accounting)

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<sup>&</sup>lt;sup>3</sup> Section 21F(g)(3) of the Exchange Act, 15 U.S.C. § 78u-6(g)(3), provides, in relevant part, that any monetary sanction of \$200 million or less collected by the SEC in any judicial action brought by the SEC under the securities laws that is not added to a disgorgement fund or fair fund or otherwise distributed to victims, plus investment income, shall be deposited or credited into the SEC Investor Protection Fund.

#### **CERTIFICATE OF SERVICE**

I, Catherine E. Pappas, hereby certify that on October 18, 2019, I caused a true copy of this document and accompanying papers to be served upon the defendant by filing the same via the CM/ECF system.

/s/ Catherine E. Pappas Catherine E. Pappas

# Exhibit A (Final Accounting)

Section	Line					
		CONSOLIDATED FINAL ACCOUNT				
Α	1	DISTRIBUTION FUND	SEC V JONES FAII	R FUND		
	2	SEC Action Number	SEC- B-03050-C			
	3	Case Number	1:16-cv-10524-RGS	3		
		Period Covered in this Report:				
	4	From 2/8/2017				
	5	To 9/30/2019				
В		Increases in Fund Balance				
	1	Contributions/Deposits		\$	606,300.04	
	2	Investment/Interest Income			4,217.70	
	3	Other - describe			-	
		Subtotal Funds Received	•			\$ 610,517.74
С		Decreases in Fund Balance				
	1	Gross Distributions to Claimants	s/Investors			
		Less Returned & Cancelled Che	ecks			
					(600,210.50)	
		Distributions to Claimants/Invest	tors, Net			(600,210.50)
		Payments to Other than Claimar	nts/Investors:			
	2	Plan Administration Fees ar	nd Costs		-	
	3	Tax Administrator Fees and	l Expenses		(4,712.02)	
	4	Investment/Bank Fees	·		(8.74)	
		Income Tax Payments, Net	of Refunds		, ,	
	5	Federal			(948.49)	
	6	District of Colu	mbia/State		-	
	7	Other - describe			-	
		Subtotal Disbursements				(5,669.25)
D		Ending Balance				\$ 4,637.99

Section	Line	U.S. DISTRICT COURT DETAIL by ACCOU		ASH BASIS for	
Α	1	DISTRIBUTION FUND	SEC V JONES	FAIR FUND	
	2	SEC Action Number	SEC- B-03050	-C	
	3	AP File No. / Case Number	1:16-cv-10524	-RGS	
		Period Covered in this Report:			
	4	From	2/8/2017		
	5	То	8/31/2019		
				U.S. District Court District of Massachusetts CRIS 116CV010524001	
		DESCRIPTION	DATE	AMOUNT	TOTAL
В	1	CONTRIBUTIONS/DEPOSITS			
		Settlement	2/10/2017	6,210.04	6,210.04
		Total to Line B 1		6,210.04	6,210.04
В	2	INVESTMENT/INTEREST EARNINGS			
	_	Total Earnings Posted to Account Annual Total	_		_
		Interest	2017	40.65	40.65
		Interest	2018	49.08	49.08
		Total to Line B 2		89.73	89.73
В	3	OTHER INCREASES IN FUND BALANCE	_		
		Total to Line B 3			-
С	1	DISBURSEMENTS TO INVESTORS			
		Total to Line C 1			
С	2	PLAN ADMINISTRATION FEES and COST	S		
		Total to Line C 2		-	-

Section	Line	U.S. DISTRICT COURT DETAIL by ACCOUNTIN		ASH BASIS for	
Α	1	DISTRIBUTION FUND	SEC V JONES	FAIR FUND	
	2	SEC Action Number	SEC- B-03050	-C	
	3	AP File No. / Case Number	1:16-cv-10524	-RGS	
		Period Covered in this Report:			
	4	From	2/8/2017		
	5	То	8/31/2019		
				U.S. District Court District of Massachusetts CRIS 116CV010524001	
		DESCRIPTION	DATE	AMOUNT	TOTAL
•	2	TAX ADMINISTRATOR FEES & BOND			
С	3		15		
		Bonds:			
		Total Bond Fees Paid		-	-
		Tax Administrator Fees:			
		Total Tax Administrator Fees Paid		-	-
		Total to Line C 3		-	-
•		INVESTMENT SYPEMOSE: A F			
С	4	INVESTMENT EXPENSES including	FO		
		BUREAU OF PUBLIC DEBT (BPD) FEI			
		COURT REGISTRY INVESTMENT SYS	STEM (CRIS) FEES		
		Total to Line C 4			-
		Total to Line 0 4		-	
				-	
С	5	FEDERAL TAX (PAYMENTS) / REFUN	IDS		
					-
		Total to Line C 5		-	**
С	6	DISTRICT OF COLUMBIA (DC) & STA	TE TAY DAYMENTS		
C	6	DISTRICT OF COLUMBIA (DC) & STA	IE IAN PATMENTS		
		Total to Line C 6			
				-	
C	7	OTHER DECREASES IN FUND BALAN	NCE		
					_
		Total to Line C 7		-	_

A	1 2 3 4 5	U.S. DISTRICT COURT DETAIL by ACCOU CONSOLIDATED FINAL ACCOUNTING RI DISTRIBUTION FUND SEC Action Number AP File No. / Case Number Period Covered in this Report: From To		FAIR FUND -C	
		DESCRIPTION	DATE	AMOUNT	TOTAL
TRF		TRANSFERS BETWEEN ACCOUNTS	200		
	1	To Plan Administrator:	_		
		Total Transfers to Plan Administrator		-	•
	2	From Plan Administrator:			-
		Total Transfers from Plan Administrator			-
	3	To Tax Administrator:			
		Total Transfers to Tax Administrator			-
	4	From Tax Administrator:			
		Total Transfers from Tax Administrator			-
	5	Between Accounts Held by this Account Manager: Transfer to OFM account Total Transfers Between Accounts Herein	7/31/2018	(6,299.77) (6,299.77)	(6,299.77) (6,299.77)
	8	To OFM:			
		Total Transfers to OFM			-
	9	From OFM:			
		Total Transfers from OFM			-
		Total Transfers, Net		(6,299.77)	(6,299.77)

Section Line U.S. DISTRICT COURT DETAIL by ACCOUNT for CONSOLIDATED FINAL ACCOUNTING REPORT on the CASH BASIS for Α 1 **DISTRIBUTION FUND** SEC V JONES FAIR FUND 2 **SEC Action Number** SEC- B-03050-C 3 AP File No. / Case Number 1:16-cv-10524-RGS Period Covered in this Report: 4 From 2/8/2017 5 To 8/31/2019 **U.S. District Court** District of Massachusetts CRIS 116CV010524001 DATE **TOTAL** DESCRIPTION **AMOUNT** SUM SUMMARY and RECONCILIATION to ENDING ACCOUNT BALANCES **Total Increases** Section B 6,299.77 6.299.77 Less: Total Decreases Section C **Total Transfers Between Accounts** TRF (6,299.77)(6,299.77)**Ending Balance** Н Prepared by: This exhibit has been prepared from information obtained from the Clerk of the U.S. District Court for the District of Massachusetts which we believe to be accurate and reliable. We have neither audited nor verified this data and offer no assurance as to its completeness. 1 Miller Kaplan Arase LLP (entity name) 2 Jude P. Damasco (signature) (printed name) 3 Tax Administrator 10/15/19 (title) (date)

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Section A	1 2 3 4 5	OFFICE OF MANAGEMENT DETAIL by ACCONSOLIDATED FINAL ACCOUNTING REDISTRIBUTION FUND SEC Action Number AP File No. / Case Number Period Covered in this Report: From To		FAIR FUND -C		
				OFM Non-interest Bearing Deposit Fund Account B-03050-C	BFS Interest Bearing Account B-03050-C	
		DESCRIPTION	DATE	AMOUNT	AMOUNT	TOTAL
В	1	CONTRIBUTIONS/DEPOSITS  Settlement Settlement Settlement Settlement Settlement Total to Line B 1  INVESTMENT/INTEREST EARNINGS	5/16/2017 5/16/2017 5/20/2018 5/2/2019 5/2/2019	18,250.10 276,804.47 261,717.02 4,945.43 38,372.98 600,090.00		18,250.10 276,804.47 261,717.02 4,945.43 38,372.98 600,090.00
5	_	Interest Interest Total to Line B 2	2017 2018		1,771.85 2,356.12 4,127.97	1,771.85 2,356.12 4,127.97
В	3	OTHER INCREASES IN FUND BALANCE Total to Line B 3	_			<u>-</u>
С	1	DISBURSEMENTS TO INVESTORS  Distributions Distributions Total to Line C 1	2018 2019	(556,416.59) (43,793.91) (600,210.50)		(556,416.59) (43,793.91) (600,210.50)
С	2	PLAN ADMINISTRATION FEES and COSTS  Total to Line C 2	<u>S</u>	-		<u>-</u>

Section A	1 2 3 4 5	OFFICE OF MANAGEMENT DETAIL by ACCONSOLIDATED FINAL ACCOUNTING REDISTRIBUTION FUND SEC Action Number AP File No. / Case Number Period Covered in this Report: From To		FAIR FUND C	BFS Interest Bearing Account B-03050-C	
		DESCRIPTION	DATE	AMOUNT	AMOUNT	TOTAL
С	3	TAX ADMINISTRATOR FEES & BONDS  Bonds:  Total Bond Fees Paid  Tax Administrator Fees: Miller Kaplan Miller Kaplan Total Tax Administrator Fees Paid  Total to Line C 3	7/20/2018 6/28/2019	(2,495.00) (2,217.02) (4,712.02) (4,712.02)	- - - - -	(2,495.00) (2,217.02) (4,712.02) (4,712.02)
С	4	INVESTMENT EXPENSES including BUREAU OF PUBLIC DEBT (BPD) FEES or COURT REGISTRY INVESTMENT SYSTEM BPD Fees BPD Fees Total to Line C 4		(5.03) (3.71) (8.74)		(5.03) (3.71) (8.74)
С	5	FEDERAL TAX (PAYMENTS) / REFUNDS  Total to Line C 5	_	-		- -
С	6	DISTRICT OF COLUMBIA (DC) & STATE TA	AX PAYMENTS			- -
С	7	OTHER DECREASES IN FUND BALANCE Total to Line C 7				- -

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OFFICE OF MANAGEMENT DETAIL by ACCOUNT for

**CONSOLIDATED FINAL ACCOUNTING REPORT on the CASH BASIS for** 

Section Line

Α 1 **DISTRIBUTION FUND SEC V JONES FAIR FUND** 2 **SEC Action Number** SEC-B-03050-C 3 AP File No. / Case Number 1:16-cv-10524-RGS **Period Covered in this Report:** 2/8/2017 From 4 5 To 9/30/2019 **OFM BFS** Non-interest **Bearing Deposit Interest Bearing Fund Account** Account B-03050-C B-03050-C **DESCRIPTION** TOTAL DATE **AMOUNT AMOUNT TRF** TRANSFERS BETWEEN ACCOUNTS To Plan Administrator: 1 Total Transfers to Plan Administrator 2 From Plan Administrator: Total Transfers from Plan Administrator 3 To Tax Administrator: Transfer re: Income Tax Payments 7/20/2018 (724.00)(724.00)Transfer re: Income Tax Payments 9/24/2019 (224.49)(224.49)Total Transfers to Tax Administrator (948.49) (948.49)From Tax Administrator: 4 Total Transfers from Tax Administrator 5 Between Accounts Held by this Account Manager: Transfer to BFS account 294,582.48 5/25/2017 (294,582.48)Transfer to BFS account 5/23/2018 (261, 298.27)261,298.27 Transfer fr BFS account 560,008.72 6/12/2018 (560,008.72)Transfer fr CRIS account 7/31/2018 6,299.77 6,299.77 Total Transfers Between Accounts Herein 10,427.74 (4,127.97)6,299.77 6 To Court: Total Transfers to Court 7 From Court: Total Transfers from Court 9,479.25 (4,127.97)5,351.28 Total Transfers, Net

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Section A	1 2 3 4 5	OFFICE OF MANAGEMENT DETA CONSOLIDATED FINAL ACCOUN DISTRIBUTION FUND SEC Action Number AP File No. / Case Number Period Covered in this Report: From	SEC V SEC V SEC- E 1:16-cv	n the C	FAIR FUND		
			3/30/	12013	OFM Non-interest Bearing Deposit Fund Account B-03050-C	BFS Interest Bearing Account B-03050-C	
		DESCRIPTION	DAT	TE	AMOUNT	AMOUNT	TOTAL
SUM		SUMMARY and RECONCILIATION	to ENDING ACC	OUNT B	ALANCES		
		Total Increases Less: Total Decreases Total Transfers Between Accounts	Section Section TRF		600,090.00 (604,931.26) 9,479.25	4,127.97 - (4,127.97)	604,217.97 (604,931.26) 5,351.28
		Ending Balance			4,637.99	0.00	4,637.99
E		Fund Information: Tranches from					
		<u>Di</u>	stributions # Issued Dat	te	Gross Payments	Returned/Cancelled	Net Distributed
				2018	(556,416.59)	34,218.79	(522,197.80)
			1 10/22/ 4 5/15	72018 5/2019	(34,218.79) (43,793.91)		(34,218.79) (43,793.91)
			Total		(634,429.29)	34,218.79	(600,210.50)
Н		Prepared by:					
	1	Office of Financial Management, Enforcement (entity name)					
	2	Lewis, Warren Digit (signature)	ally signed by Lewis, 2019.10.08 12:49:21	Warren -04'00'	(	Warren Lewis printed name)	
	3	Chief, Enforcement Treasury Operations Braid (title)	nch		(	October 8, 2019	

Section	Line	TAX ADMINISTRATOR DETAIL by ACCOU CONSOLIDATED FINAL ACCOUNTING RE		SH BASIS for	
Α	1	DISTRIBUTION FUND	SEC V JONES F	AIR FUND	
	2	SEC Action Number	SEC- B-03050-C		
	3	AP File No. / Case Number	1:16-cv-10524-R	RGS	
		Period Covered in this Report:			
	4	From	2/8/2017		
	5	То	8/31/2019		
				Damasco & Associates LLP SEC Client Trust Account	
		DESCRIPTION	DATE	AMOUNT	TOTAL
В	1	CONTRIBUTIONS/DEPOSITS			
		Total to Line B 1		•	-
В	2	INVESTMENT/INTEREST EARNINGS			
		Total to Line B 2		-	•
В	3	OTHER INCREASES IN FUND BALANCE		11 11	
		Total to Line B 3		-	-
С	1	DISBURSEMENTS TO INVESTORS			
		Total to Line C 1		-	-
С	2	PLAN ADMINISTRATION FEES and COST	S		10.0
		Total to Line C 2			-

Section	Line	TAX ADMINISTRATOR DETAIL by ACCO	AIL by ACCOUNT for COUNTING REPORT on the CASH BASIS for SEC V JONES FAIR FUND				
Α	1	DISTRIBUTION FUND					
	2	SEC Action Number	SEC- B-03050-0				
	3	AP File No. / Case Number	1:16-cv-10524-F	RGS			
		Period Covered in this Report:					
	4	From	2/8/2017				
	5	То	8/31/2019				
				Damasco & Associates LLP SEC Client Trust Account			
		DESCRIPTION	DATE	AMOUNT	TOTAL		
С	3	TAX ADMINISTRATOR FEES & BONDS					
		Bonds:					
		Total Bond Fees Paid		-	-		
		Tax Administrator Fees:					
		Total Tax Administrator Fees Paid		-	-		
		Total to Line C 3			_		
_							
C	4	INVESTMENT EXPENSES including					
		BUREAU OF PUBLIC DEBT (BPD) FEES					
		COURT REGISTRY INVESTMENT SYSTE	M (CRIS) FEES				
		Total to Line C 4			-		
С	5	FEDERAL TAX (PAYMENTS) / REFUNDS					
		2017 Federal Income Tax	7/27/2018	(724.00)	(724.00)		
		2017 Federal Income Tax Notice	10/1/2018	(224.49)	(224.49)		
		Total to Line C 5		(948.49)	(948.49)		
С	6	DISTRICT OF COLUMBIA (DC) & STATE	TAY PAYMENTS				
•	U	BIOTHET OF COLUMNIA (BO) & OTHER	TAT ATMENTO				
		Total to Line C 6		-	-		
	_	OTHER DEADERAGES IN SUID DAY AND					
С	7	OTHER DECREASES IN FUND BALANCE			-		
		Total to Line C 7			-		

Section		TAX ADMINISTRATOR DETAIL by ACCO CONSOLIDATED FINAL ACCOUNTING R	EPORT on the CA		
Α	1	DISTRIBUTION FUND	SEC V JONES F		
	2	SEC Action Number	SEC- B-03050-C		
	3	AP File No. / Case Number	1:16-cv-10524-F	RGS	
		Period Covered in this Report:			
	4	From	2/8/2017		
	5	То	8/31/2019		
				Damasco & Associates LLP SEC Client Trust Account	
		DESCRIPTION	DATE	AMOUNT	TOTAL
TRF		TRANSFERS BETWEEN ACCOUNTS			
	1	To Plan Administrator:			
		Total Transfers to Plan Administrator		•	-
	2	From Plan Administrator:			
		Total Transfers from Plan Administrator		-	-
	5	Between Accounts Held by this Account Manager:			
		Total Transfers Between Accounts Herein			-
	6	To Court:			
		Total Transfers to Court			-
	7	From Court:			
		Total Transfers from Court		•	-
	8	To OFM:			
		Total Transfers to OFM			-
	9	From OFM:			
		Transfer re: Income Tax Payments	7/20/2018	724.00	724.00
		Transfer re: Income Tax Payments	9/24/2018	224.49	224.49
		Total Transfers from OFM		948.49	948.49
		Total Transfers, Net		948.49	948.49

Section	Line	AX ADMINISTRATOR DETAIL by ACCOUNT for CONSOLIDATED FINAL ACCOUNTING REPORT on the CASH BASIS for				
Α	1	DISTRIBUTION FUND	SEC V JONES F			
	2	SEC Action Number	SEC- B-03050-C			
	3	AP File No. / Case Number	1:16-cv-10524-R	egs		
		Period Covered in this Report:				
	4	From	2/8/2017			
	5	То	8/31/2019			
				Damasco & Associates LLP SEC Client Trust Account		
		DESCRIPTION	DATE	AMOUNT	TOTAL	
SUM		SUMMARY and RECONCILIATION to E  Total Increases Less: Total Decreases Total Transfers Between Accounts  Ending Balance	NOING ACCOUNT BA Section B Section C TRF	(948.49) 948.49	(948.49) 948.49 -	
Н	1 2	Prepared by:  Miller Kapfan Arase LLP fka Damasco & Associate (tax administrator)  (signature)  Tax Administrator	s LLP		lude P. Damasco printed name) fû/f5/19	
	J	(title)		- 4	tate),	