

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

U.S. COMMODITY AND FUTURES)	
TRADING COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:09-cv-1331
SEAN NATHAN HEALY)	
)	Judge Conner
Defendant,)	
)	
and)	
)	
SHALESE HEALY and)	
SAND DOLLAR INVESTING PARTNERS)	
LLC)	
)	
Relief Defendants.)	
)	

RECEIVER'S INITIAL REPORT

Melanie E. Damian, Esq., the court-appointed receiver (the "Receiver") in the above-captioned matter, herby submits her initial report regarding the present status of the Estate of Sean Nathan Healy (the "Estate").¹

I. INTRODUCTION

At approximately 5:00 p.m. on July 13, 2009, the Receiver was provided with a certified copy of the Court's July 13, 2009 Order Granting Plaintiff's Ex Parte Emergency Motion for Statutory Restraining Order, Expedited Discovery, Preliminary Injunction,

¹ Although the Court's July 13, 2009 Order Granting Plaintiff's *Ex Parte* Emergency Motion for Statutory Restraining Order, Expedited Discovery, Preliminary Injunction, and Other Equitable Relief, the relief of which was extended pursuant to the Consent Order of Preliminary Injunction and for Other Equitable Relief Against Defendant Sean Nathan Healy (the "Preliminary Injunction"), contemplates the issuance of Quarterly Receiver's Reports (paragraphs 35 and 36), the Receiver believes it prudent to file this Initial Report so as to apprise all interested parties and possible claimants as to the status of the seized assets as well as those that are being concealed.

and Other Equitable Relief (the "TRO"). Within minutes of receiving the TRO, the Receiver, having reviewed the Complaint filed by the Commodities Futures Trading Commission (the "Commission") commencing this enforcement action, the Commission's *Ex Parte* Emergency Motion for Statutory Restraining Order, Expedited Discovery, Preliminary Injunction, and Other Equitable Relief, and the Commission's Memorandum in Support of its Motion, and all of the evidence in support thereof, and understanding the nature of the Commission's claims against Defendant Sean Nathan Healy ("Defendant") and Relief Defendants, Shalese Rania Healy and Sand Dollar Investing Partners, LLC (collectively, the Relief Defendants") and the substantial funds and other significant assets comprising the Estate and their probable locations, directed her team to fax the TRO to all known financial institutions and other entities where it is believed Defendant and Relief Defendants may hold Estate assets.

By 7:00 p.m. that evening, the Receiver, her attorneys and deputies from the Broward County Sheriff's Office entered the Healy residence at 2672 Riviera Manor, Weston, Florida 33332. Simultaneously, other representatives of the Receiver secured a warehouse facility known to be used by the Defendant and/or his associates, located in South Florida (the "Warehouse"). Located in this Warehouse were a 2007 Black Lincoln Town Car Stretch Limousine, a yellow 2006 Lamborghini Murcielago Convertible, and a 1991 black Porsche 911 Turbo, each of which is described in further detail below and in the Inventory attached hereto as **Exhibit "A"**.

When the Receiver and her counsel arrived at the residence of Defendant and Relief Defendant Ms. Healy (collectively, the "Healys"), the Healys, their four children ranging in age from 1 to 15, and their children's nanny were present. Shortly thereafter, the family bodyguard, Tim Cash, and counsel for the Healys, Alan Ross, Esq., arrived at

the house. Later that evening, former Miami Dolphins defensive end Jeff Cross arrived at the residence and remained for the duration of the Receiver's inspection. Defendant was initially hesitant to permit the Receiver and her counsel to enter the house but was convinced to permit entry by the Broward Sheriff Deputies and Mr. Ross, who had read the TRO and the break order provision contained therein. Mr. Ross and the Broward Sheriff Deputies and Tim Cash monitored the Receiver's inspection of the premises and seizure of the assets contained therein. Late in the evening, other counsel for the Healys, Jeffrey Cox, Esq. arrived at the house.

Upon gaining entry to the residence, the Receiver instructed Mr. Healy to retrieve all items of jewelry in the house or on any person and place it on the dining room table for inspection, identification, and photographing. The valuable jewelry was seized and is itemized below and in the attached Inventory. All of the jewelry seized by the Receiver is contained in three safety deposit boxes in South Florida. After cataloguing and securing the items of jewelry for seizure, the Receiver and her team went through every room and closet in the house taking note of and photographing the valuable property. During the inspection, the Receiver and her counsel located and had opened two safes. The first, located in a closet near Defendant's office, contained three guns and certain jewelry inspected and seized. The second safe was located in a closet off the garage and contained the gold and silver collectible coins, bullion and bars, which were all seized and are described in detail on the attached Schedule. In other rooms the Receiver's team observed numerous items of collector's sports and music memorabilia, which were later seized and are listed in the attached Inventory. All closets and drawers throughout the house were opened and inspected for Estate assets, including assets of Ms. Healy valued in excess of \$5,000. The Receiver located one PC computer in Defendant's downstairs

home office and an Apple computer at a desk upstairs. The disk processing units of both computers, along with two cell phones, were seized, and the Receiver agreed to temporarily place them in the possession of Mr. Ross, who explained that certain privileged information may be on both computers and phones. Subsequently, the computers were delivered to the Receiver, who shipped them to the Commission for copying of the hard drives, pursuant to a protocol agreed by counsel for the Healys, Mr. Ross.

In addition to the assets discussed above, the Receiver seized a 2008 silver Lamborghini Gallardo Convertible, a 2007 Black Bentley GT Convertible, and 2007 red Ferrari F430 Spyder, all of which were parked in the Defendant's residence garage. These vehicles were transported to the Warehouse for storage. In addition, a 2003 Black Porsche 911 Turbo was returned to the Warehouse by Mr. Healy's bodyguard who testified during his deposition that he was given the car and the transfer of title from Mr. Healy as a "bonus". The locks at the Warehouse and the adjoining office were changed with high security locks, and the keys are in possession of the Receiver. The pass-code to the alarm system for the Warehouse and office was changed and the security monitoring company notified and requested to change the account to under the name of the Receiver. The landlord for that facility was provided with the TRO, and has informed the Receiver that the lease, which runs from January 1, 2009 through December 31, 2009, is for \$3,500 per month and that the Defendant had prepaid for the entire year in the amount of \$42,000. The lease on that Warehouse space has been transferred to the Receiver. At the present time, the Receiver believes that maintaining the facility is in the best interest of the Estate in that it is secure, paid for and a convenient facility for additional storage of non-safety deposit box items. Presently all of the seized sports and music memorabilia,

Giuseppe Armani porcelain figurines, and Versace Rosenthal china, stemware and flatware are stored in the air-conditioned office adjoining the Warehouse. Such Warehouse is bonded and the automobiles stored therein are insured.

II. RECEIVER'S SEIZING AND SECURING OF TANGIBLE PROPERTY OF THE RECEIVERSHIP ESTATE

A. THE RESIDENCE

The residence seized at 2672 Riviera Manor was constructed in 1997 and consists of 8585 square feet of living space and 952 square feet of additional garage space. The exterior is made of concrete block, stucco, and stone columns and reflects Mediterranean-influenced architecture. The home has been substantially upgraded by the Healys. The unit's interior flooring is primarily covered with marble, but also has high grade carpeting and custom hardwood. The interior partition walls are drywall finished with paint, textured walls, ceramic tile, custom wood paneling, hand painted wallpaper and padded fabric. There are coffered and cathedral ceilings in the living room. The unit's kitchen consists of custom crafted wood cabinetry with granite countertops. The bath areas contain glass tile, marble slab, travertine and tumbled marble floors. Specialty items of the unit include built-in safes, built-in stereo speaker system, digital house-CAT 5 home automation system, movie projection system, movie screen, theatre seating, niches, permanent back up generator, marble and stone fireplace, plantation shutters, smart house-wiring and panels, steam shower, video surveillance cameras and walk-in closets with cabinetry.

Pursuant to the TRO and the Preliminary Injunction, the Receiver has the right to the possession of the residence. Accordingly, the Receiver has obtained keys for the residence, has possession of the alarm code, and is monitoring its condition and contents

on a regular basis for the purpose of preserving its value. The Receiver's personnel have been visiting the home on at least a weekly basis to ensure preservation of the asset and the assets contained therein. In accordance with the TRO and the Preliminary Injunction, the Healys are being permitted to continue to reside in the unit until further agreement of the parties or a determination of the Court. As of the date of this report, the Healys are maintaining the residence premises in a clean and orderly condition.

B. THE VEHICLES

From the residence, the Receiver seized a 2008 silver and pink Lamborghini Gallardo Convertible (VIN ZHWGU22T58LA06581), a 2007 red Ferrari F430 Spyder (VIN ZFFEW59A570154292), and a 2007 Black Bentley GT Convertible (VIN SCBDR33W57C050378). These vehicles were transported to the Warehouse, which already contained a 2007 Black Lincoln Town Car Stretch Limousine (VIN 1L1FM88W977632915), a yellow 2006 Lamborghini Murcielago Convertible (VIN ZHWBU26S46LA01879), and a 1991 black Porsche 911 Turbo (VIN WPOAA2965MS480129). All of these vehicles are being stored in that Warehouse, to which only the Receiver and her counsel have access. The Receiver permitted the Defendant to retain control over the 2009 Chevrolet Suburban (VIN 1GNFC36J99J125824), which was parked in the driveway of the residence upon the Receiver's arrival, for the personal transportation of his family.

The Receiver has also located a Hummer golf-cart belonging to the Defendant which the Receiver seized and transferred to the Warehouse for storage with the other vehicles. Because the Warehouse garage door may only be opened from inside the Warehouse unit, the Receiver secured the entire unit by having the locks to the main office door changed. The Receiver also changed the alarm code for the Warehouse and

notified ADT Security Services, Inc. ("ADT") of the TRO and the Receiver's right to possession of Defendants and Relief Defendants property interests. ADT transferred the alarm contract to the Receiver.

The Receiver recently took the deposition of Tim Cash, who served as bodyguard and investigator for the Healy family. He arrived at the deposition in a 2003 Porsche 911 Turbo (VIN WP0AB29983S686390) that was a gift from Mr. Healy to Mr. Cash. Counsel for the Receiver verified that this Porsche is listed on the Schedule of assets attached to the TRO. Accordingly, the Receiver's counsel demanded that Mr. Cash turn the vehicle over, and Mr. Cash agreed to deliver the vehicle to the Warehouse facility by July 22, 2009 and to deliver title of the vehicle to the Receiver. Such turnover has been completed and the Receiver is now in possession of that Porsche and its title.

A number of vehicles thought to be owned by and in possession of the Healys, based on information obtained by the Commission during its investigation have been sold or traded in. In particular, according to the deposition testimony of Anthony Cipriano, a former luxury/exotic car salesman with Excel Automobiles of Ft. Lauderdale, who brokered the purchase and sale of the Defendant's vehicles, the Healys sold or traded in two Lamborghini Gallardo Spyders, one Ferrari 360 F1 Spyder, one 2005 Porsche Carrera GT, a Maserati Quattroporte, and a 2006 Saleen S7. The Receiver is currently attempting to locate a 1995 Ferrari F355 GTS (VIN ZFFPR42A9S0101284), a 1965 Ford AC Cobra Replica convertible (AA9BMAAHV81CN109), and other vehicles that have only been identified by their title numbers, which, based on the Commissions investigation, are or were owned by the Healys. Mr. Cipriano testified that he did not know their location and could not confirm whether or not they were sold or otherwise disposed of. The Receiver has subpoenaed the Department of Motor Vehicles to confirm

the ownership status and the purchase and sale history of all vehicles associated with the Defendants and Relief Defendants. The Receiver has also sent a demand letter to the Defendant and Relief Defendants requiring the immediate turnover and/or information on the whereabouts of the missing vehicles. All vehicles associated with the Healys, whether in the possession of the Receiver or missing, are listed on the attached Inventory. The Receiver will continue to work to determine the location or disposition of the missing vehicles.

C. THE JEWELRY AND WATCHES

The Receiver seized numerous pieces of jewelry at the Healys' residence, including several watches, bracelets, earrings and necklaces, many of which were laced with diamonds and other precious stones. The brands of the items seized included Rolex, Piaget, Patek Philippe, Hublot, Paris Hilton, Gregg Ruth, and Levian Couture. A detailed list of the items of jewelry that the Receiver seized and is storing in safety deposit boxes, as well as the jewelry that the Healys have not yet turned over, but which, based on the Commission's and the Receiver's investigations, are owned by and in the possession of the Healys, is set forth on the attached Inventory. Included among the missing jewelry is a 4.01 carat pink diamond engagement ring, with a fair market value of \$619,000, a Gregg Ruth 8.09 carat yellow diamond engagement ring, with a fair market value of \$257,000, a multi-colored diamond encrusted platinum and rose gold bracelet, with a fair market value of \$219,000, and numerous luxury watches, with fair market value, collectively, of more than \$600,000. All of the missing items of jewelry, as well as the jewelry seized by the Receiver, are listed on the attached Inventory.

The Receiver's counsel has taken the deposition of Edward Dikes of Weston Jewelers, who sold the Healys the majority of the jewelry that is subject to the TRO and

the Preliminary Injunction and listed on Schedule A to the TRO. Mr. Dikes testified that he sold to the Healys and the Healys paid for that jewelry with a fair market value in excess of \$2,000,000, that he delivered or the Healys took delivery of that jewelry, that the Healys never sold or traded in any of the jewelry to him or his jewelry store or any person or entity of which he was aware, and that he never had possession, custody or control over any of that jewelry after the delivery to the Healys. Mr. Dikes produced to the Receiver invoices for all of the jewelry that the Healys purchased from him and appraisals for most of that jewelry. After taking Mr. Dike's deposition, the Receiver made formal demand upon counsel for the Healys for the immediate turnover all missing jewelry and will continue to work to locate such jewelry.

D. THE VALUABLE, MOVABLE HOUSEHOLD ITEMS

The Receiver catalogued a number of valuable household items at the Defendant's residence, including seventeen plasma televisions, multi-room stereo speaker system, digital house-CAT 5 home automation system, a Runco movie projection system, a movie screen, a pool table, designer and custom furniture and fixtures, two sets of LG washer-dryer units, gym equipment, and a treadmill, three signed guitars, sports memorabilia, an extensive set of Versace Rosenthal china, numerous Giuseppe Armani figurines and other statues, and artwork.

Many the movable items of property have been transported to the Warehouse for storage. The Receiver chose to leave certain valuable items at the residence because removing them would result in a diminution in value of the residence, including the valuable electronic audio and video equipment permanently built-in to the premises.

The Receiver also seized numerous collectors' gold and silver coins, coin sets, bullion and a silver bar. All of the items of valuable property, whether built-in and

remaining at the premises or movable and seized by the Receiver, are listed on the attached Inventory.

III. RECEIVER'S FREEZING OF ACCOUNTS AT FINANCIAL INSTITUTIONS AND RECEIPT OF ACCOUNT BALANCES

The Receiver has served the TRO and/or Subpoenas (attaching the TRO) on all known financial institutions at which Defendants have, had, or may have accounts. These institutions include banks which the Healys are known to have used, banks which maintain branches in Weston, Florida where the Healys reside, those on Paradise Island and throughout the Bahamas, where the Defendants often traveled for vacation, most national banks and some international banks. The Receiver believes such canvassing for accounts and records is necessary because the Healys' passports each reflect numerous trips made via chartered jet to Paradise Island, and some such trips lasted only several hours. The Receiver is continuing to serve on other possible banks and institutions where the Defendants may maintain accounts the TRO, the Preliminary Injunction, and Subpoenas, requesting the freezing of any accounts, pertinent information and records.

Thus far, the Receiver has received confirmation from certain institutions regarding accounts held in either of the Defendants' names. Northern Trust Bank and Bank of America have confirmed that an account is held in the name of Shalese Healy and that such account has been frozen in accordance with the TRO. On July 16, 2009, Northern Trust confirmed an account balance of \$482,250.90. *See* confirmation letter from Northern Trust attached hereto as **Exhibit "B"**. The Receiver has demanded and is awaiting the transfer of those funds to the receivership's bank account. On July 14, 2009, Bank of America confirmed an account balance of \$36,148.57. *See* confirmation letter

from Bank of America attached hereto as **Exhibit "C"**. The Receiver has received those funds from Bank of America and will deposit them in the receivership's bank account.

The Receiver's counsel has also sent the TRO and Subpoenas to the Atlantis Resort and Casino and the Seminole Hard Rock Casino, where the Healys are known to have gambled, stayed and or frequented. Each casino confirmed that the Healys do not have any open accounts, credits, boxes or units of any kind with the hotel or casino, and that the Healy's gambled and lost, collectively, less than \$10,000 at each casino.

IV. RECEIVER'S TAKING OVER LEASES AND MEMBERSHIPS

The Receiver served the TRO on a number of entities with which the Defendant held leases, licenses and/or memberships. The Receiver served the landlord of the Warehouse, took over the lease of the Warehouse (which the defendant prepaid for the current year), changed the locks and the alarm code, transferred the ADT contract to the Receiver, and insured and bonded the premises to protect the value of its contents (vehicles, household items, etc.). The Receiver also served the TRO on Weston Hills Country Club where the Defendant maintained a Platinum club membership. The Receiver requested that the club freeze all membership and credit accounts, and any lockers and boxes held by the Defendants, and is working to obtain a partial refund of the initiation and any other fees paid by the Healys. Further, the Receiver served copies of the TRO on the Bank Atlantic Center and the American Airlines Arena, where the Defendant had license agreements for the use of boxes for sporting and other events. The Receiver has established contact with each arena in an attempt to cancel the license agreements in order to obtain a partial refund, or have the agreements transferred to the Receiver so that they may be sold.

The Bank Atlantic Center has agreed to re-purchase the Healys' box holding 20 seats for the 6 or 7 remaining shows under the License Agreement through the end of its term on September 14, 2009, for \$6,000, a reasonable value for the remaining shows. The American Airlines Arena has informed the Receiver that the Healys' were in arrears on payments due under their license agreement and, thus, there is no refund for the Receiver to recover for the estate.

V. RECEIVER'S NAMED INSURED UNDER DEFENDANTS' INSURANCE POLICIES

The Receiver served the TRO on the Defendant's Insurance Agent, Rick Gibbs P.A. Insurance. The Insurance Agent has cooperated, providing copies of the: (i) Homeowner's Policy; (ii) Jewelry Replacement Value Policies (\$1,751,500); (iii) Automobile Policies; and (iv) Premises Liability Coverage for the Warehouse. Relevant portions of the Homeowners', Jewelry Replacement Value and Automobile policies, including declarations pages, are attached hereto as **Composite Exhibit "D"**. According to the policies, the Healys had insured all of the jewelry listed on Schedule A to the TRO including, the missing items detailed herein and on the attached Inventory. The Receiver was recently notified by the insurance broker that the Receiver has been named as an insured under the Healy's insurance policies.

The Healys have never filed a claim against any of their insurance policies for any of the missing jewelry or vehicles, nor have they reported to Mr. Cash, their bodyguard and investigator, or Mr. Cipriano, their car consultant and mechanic, that any jewelry or vehicle was lost, stolen or missing. Recently, the insurance agent notified the Receiver's counsel that Defendant requested a copy of the Appraisal of the \$257,000 8.09 carat yellow diamond engagement ring.

VI. THE RECIEVER HAS SUBPOENAED PARTIES AND WITNESSES FOR DEPOSTION

The Receiver has now taken the depositions of several key witnesses including Timothy Cash, Anthony Cipriano and Edward Dikes of Weston Jewelers. Timothy Cash provided valuable information about the Healys' assets and the whereabouts of a missing Porsche as described in greater detail below. Anthony Cipriano confirmed having first hand knowledge of the Healys' purchase, sale or trade-in of all of most of the vehicles listed on Schedule A to the TRO. He has also offered to assist the Receiver in preserving the stored vehicles and maintaining them in good working condition until they are sold. The Receiver is considering his offer and will compare it to other offers obtained for the same services. Finally, at the deposition of Edward Dikes, the jeweler confirmed that Weston Jewelers had sold the Healys each of the item of jewelry listed on Schedule A to the TRO. He also confirmed delivery of each of those items to either Sean or Shalese Healy. He produced appraisals and invoices for each of the items. He also testified that Defendant had purchased from Weston Jewelers an additional pair of 5+ carot diamond stud earrings (10+ carot total weight), that for \$161,000, using Shalese Healy's Northern Trust bank account. The Receiver's counsel only located one earring of that pair at the residence during the initial inspection, and Defendant informed counsel that Ms. Healy had lost the other earring. However, recent communications indicate that it may be turned over to the Receiver. Mr. Dikes also testified that he had seen Ms. Healy wearing a diamond encrusted Rolex Masterpiece which he estimated had a fair market value of approximately \$70,000. Finally, Mr. Dikes testified that he believed the Healys had frequented, and perhaps purchased that Rolex at, a jewelry store located, among other places, in Paradise Island, Bahamas. The Receiver's counsel has been in contact with a

representative from that store and has issued a Subpoena to the store requesting all records of purchases by the Healys and related persons and entities.

The Receiver has also issued subpoenas for depositions *duces tecum* to Shalese Healy's parents, Edward and Virginia Presnell. Edward Presnell has admitted to receiving a significant amount of funds from the Healys, and records obtained by the Receiver reflect that Virginia Healy received at least \$20,000 from her daughter from the Northern Trust account. The Receiver also intends to take the deposition of Defendant's mother (his father is deceased).

The Receiver's counsel has attempted to take the depositions of Sean and Shalese Healy, but was informed by their counsel that the Healys would invoke their Fifth Amendment right against self incrimination in response to any question posed to them regarding any issue relating to this action and the receivership. Therefore, in light of the Healys' consenting to the entry of the Preliminary Injunction, the Receiver agreed to postpone their depositions to a later date.

VII. DEMANDS TO COUNSEL FOR DEFENDANT AND RELIEF DEFENDANTS FOR TURNOVER OF RETAINER FUNDS

The Receiver's counsel has made formal demand upon the Healys' civil and criminal counsel, pursuant to the TRO and the Preliminary Injunction, that such counsel immediately turnover of all funds held in their respective trust accounts on behalf of any of the Defendant or the Relief Defendants.

VIII. WORK IN PROGRESS

The Receiver will continue to utilize her team to locate, collect and preserve the assets of the Estate. The next phase with respect to these assets is to obtain current fair market appraisals of their values and begin marketing them for sale. The Receiver will

obtain Court approval for all such sales. The Receiver will also continue to gather information regarding the Defendant and Relief Defendants' finances by sending Subpoenas (with the TRO and Preliminary Injunction) to all financial institutions at which Defendants maintain, previously maintained, or may maintain accounts. The documents produced pursuant to those Subpoenas will be reviewed by either the Receiver's team or a forensic accountant and used to locate accounts, safe deposit boxes, potentially fraudulent transfers and purchases of large items.

Pursuant to the TRO and the Preliminary Injunction, the Receiver is preparing the necessary motion to intervene or otherwise participate in the Southern District of Florida action brought by one of Defendant's defrauded investors, *Alfred L. Madeira v. Sean Healy and Shalese Healy* (Case No. 09-60403-CIV-Martinez/Brown), in which other defrauded investors, Randall Wagner and John Jarboe, already intervened. Once the Receiver is properly before the *Madeira* Court, she will, among other things, request, in accordance with the TRO and the Preliminary Injunction, that all parties subject to that Court's Status Quo Order transfer all right, title and interest in all property of the Defendants to the Receiver, including, without limitation, Defendants' various legal counsel, which collectively are holding significant funds in their trust accounts.

Further, the Receiver intends to file a notice of interested party in the Chapter 11 voluntary bankruptcy proceeding of Alfred L. Madeira (Case No. 09-BK-02819), pending in the Bankruptcy Court for the Middle District of Pennsylvania. As an interested party to the bankruptcy proceeding, the Receiver will assert the rights and claims of all investors of Defendant and the Relief Defendants with respect to Mr. Madeira's bankruptcy estate to the extent permissible and appropriate under the Bankruptcy Code. The Receiver has retained local counsel in Harrisburg, Pennsylvania

who will appear on behalf of the Receiver in the Madeira bankruptcy case and has already made his appearance as counsel for the Receiver in this action.

Dated: July 30, 2009

Respectfully submitted,



Melanie E. Damian, Esq., as Receiver
of the Estate of Sean Nathan Healy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing have been sent by U.S. Mail, email, and/or facsimile to the addressees on the attached Service List, this 30th day of July, 2009.



Melanie E. Damian

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