Scott Andrew Farrow E-Filed: May 1, 2014 1 Acting Assistant United States Trustee State Bar No.: WI 1000609 2 scott.a.farrow@usdoj.gov 3 J. Michal Bloom, Trial Attorney State Bar No.: NV 4706 4 j.michal.bloom@usdoj.gov 5 UNITED STATES DEPARTMENT OF JUSTICE Office of the United States Trustee 6 300 Las Vegas Boulevard, So., Suite 4300 Las Vegas, Nevada 89101 7 Tel: (702) 388-6600 Fax: (702) 388-6658 8 Attorneys for the United States Trustee for Region 17 9 TRACY HOPE DAVIS 10 UNITED STATES BANKRUPTCY COURT 11 DISTRICT OF NEVADA 12 CASE NO. BK-S-14-12524-abl In re: 13 Chapter 11 TELEXFREE, LLC, 14 Jointly Administered with: 15 ☐ AFFECTS THE DEBTOR Telexfree, Inc. 14-12525-abl 16 □ AFFECTS ALL DEBTORS 14-12526-abl Telexfree Financial, Inc. 17 ☐ AFFECTS TELEXFREE, INC. Date: May 2, 2014 18 Time: 9:30 a.m. ☐ AFFECTS TELEXFREE FINANCIAL, INC. 19 20 DECLARATION OF JULIO J. DEFIGUEIREDO, JR. IN SUPPORT OF THE MOTION OF THE UNITED STATES TRUSTEE FOR ORDER DIRECTING THE APPOINTMENT OF A CHAPTER 11 TRUSTEE PURSUANT TO §1104 (a) 21 22 23 I, Julio J. Defigueiredo, Jr., hereby declare as follows: 24 I am over the age of 18, am mentally competent, have personal knowledge of the 1. 25 facts in this matter, and if called to testify, could and would do so. 26 I am a Deputy Sheriff currently employed by the Bristol County Sheriff's Office 2. 27

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 in Bristol County, Massachusetts.

- 3. On April 15, 2014, I, along with Special Agents from the Department of Homeland Security, Homeland Security Investigations ("HSI"), participated in the execution of a federal search warrant on the offices of TelexFree, LLC and TelexFree, Inc. (collectively "TelexFree") at 225 Cedar Hill Street in Marlborough, Massachusetts.
- 4. During the exercise of the search warrant, I encountered Joseph Craft entering an office and attempting to grab a laptop and a bag. Craft told me that he was a "consultant" helping TelexFree prepare for bankruptcy and that the laptop and bag were "personal items." I informed Craft that he could not take the laptop and bag and that these items would be subject to the search.
- 5. I was present when HSI Agents took possession of Craft's bag and searched it and have personal knowledge of its specific contents. The bag contained ten Wells Fargo Bark, N.A. cashier's checks totaling \$37,948,296.00. Eight of the checks were dated April 11, 2014 and were remitted to James M. Merrill. Of these checks, five, totaling \$25,548,808.52, were made out to TelexFree, LLC, and one, in the amount of \$2,000,634.76, was made out to Katia B. Wanzeler. Another of the ten checks was dated April 3, 2014 and was remitted to Carlos Wanzeler. This check was made out to TelexFree Dominicana SRL in the amount of \$10,398,000.00. Copies of these checks are attached to this Declaration as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 1, 2014

By:

Julio J. Defigueiredo, Jr. Deputy Sheriff, Bristol County









