UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

)
In Re:)
) Chapter 11
)
TELEXFREE, LLC,) Case No. 14-40987-MSH
TELEXFREE, INC.,) Case No. 14-40988-MSH
TELEXFREE FINANCIAL, INC.,) Case No. 14-40989-MSH
)
Debtors.) Jointly Administered
)

TWENTY-FIRST MOTION TO DISALLOW NET WINNER CLAIMS

To the Honorable Melvin S. Hoffman, United States Bankruptcy Judge:

Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of the bankruptcy estates (the "Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors" or "TelexFree"), respectfully submits this Twenty-First Motion to Disallow Net Winner Claims with respect to those persons who purchased TelexFree membership plans ("Participants") and who filed proofs of claim indicating a negative balance (that is, the claim reflects that the Participant is a Net Winner under the Net Equity formula) ("Net Winner Claims").

Background

- 1. On April 13, 2014 (the "<u>Petition Date</u>"), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code ("<u>Bankruptcy Code</u>") with the United States Bankruptcy Court for the District of Nevada.
- 2. The Debtors initially operated as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

- 3. On the Petition Date, the Debtors filed a motion for joint administration of the cases, with TelexFree, LLC designated as the lead case. By order dated April 24, 2014, the motion for joint administration was approved.
- 4. On May 6, 2014, the Nevada Bankruptcy Court allowed the motion filed by the Securities and Exchange Commission to change the venue of the cases to the United States Bankruptcy Court for the District of Massachusetts (the "Court"). The cases were transferred to the Court on May 9, 2014.
- 5. On May 30, 2014, the Court allowed the motion by the Office of the United States Trustee's to appoint a Chapter 11 trustee, and the Trustee was appointed on June 6, 2014.
- 6. TelexFree operated one of the largest Ponzi and pyramid schemes in United States history in terms of the number of persons involved. TelexFree used the sale of voice over internet protocol ("VoIP") plans as a disguise for its real business, which was the recruitment of new Participants through a multi-level marketing format and the use of membership fees paid by new Participants to pay the credits redeemed by existing Participants.
- 7. TelexFree's scheme was extensive, complicated, and multi-tiered. Most of the Participants became involved in TelexFree through a "<u>Triangular Transaction</u>", whereby a Participant was recruited to join by purchasing a membership plan and paying the membership fees to a recruiting Participant, who retained the membership fee and used his/her accumulated TelexFree credits to pay the membership fee due from the recruited Participant.

Claims Determination Process

8. On October 7, 2015, the Trustee filed his *Motion by Chapter 11 Trustee for Entry of Order Finding that Debtors Engaged in Ponzi and Pyramid Scheme and Related Relief* (the "Ponzi Motion"). In the Ponzi Motion, the Trustee sought two principal findings: first, that

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TelexFree was a Ponzi and pyramid scheme and, second, that Participant claims should be determined based upon a "Net Equity" formula commonly employed in Ponzi scheme cases.

- 9. By order dated November 25, 2015, as amended on December 21, 2015, the Court found the Debtors had engaged in a Ponzi and pyramid scheme and that this finding was the law of the case.
- 10. By supplemental order dated January 26, 2016, the Court approved the Net Equity formula for determining Participant Claims. The Net Equity formula provides for the following:
 - (i) in determining the amount of a Participant Claim, any claim or portion of claim based upon accumulated credits in a Participant's account (a "<u>User Account</u>") as of the Petition Date shall be disallowed;
 - (ii) Participant Claims shall be computed based upon the amount paid by the Participant to the Debtors, including amounts paid pursuant to Triangular Transactions, less amounts received by the Participant from the Debtors including amounts received pursuant to Triangular Transactions;
 - (iii) In determining the amount of a claim of a Participant who has more than one User Account, the activity in all of the Participant's User Accounts shall be aggregated and netted against one another.
- 11. In the initial stages of these cases, Participants submitted proofs of claim in multiple places, including the Court, the claims agent retained by the Debtors, Kurtzman Carson Consultants, LLC ("KCC"), the Federal Bureau of Investigation ("FBI"), and the Commonwealth of Massachusetts, Office of the Secretary of State. The information provided by Participants in the forms did not provide sufficient information for the Trustee to reconcile Participant claims with TelexFree's books and records.
- 12. In order to establish a process for filing and evaluating claims that was consistent, accessible, and efficient, on October 7, 2015, the Trustee filed the *Motion by Chapter* 11 Trustee for Entry of Order Fixing Bar Date for Filing Proofs of Claim, Approving Form and

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Manner of Providing Notice, Directing that Claims be Filed Electronically, and Approving Content of Electronic Proofs of Claim (the "Claims Motion"). Pursuant to the order approving the Claims Motion (the "Claims Order"), the deadline to file proofs of claim, as extended on two separate occasions, was March 15, 2017.

- 13. The Claims Order established a process whereby Participants would use an interactive, electronic claims portal hosted on the internet ("Portal") to file a claim (a "Participant ePOC") in accordance with the Net Equity formula. The Portal provided Participants with the opportunity to provide and/or confirm personal or business name(s), address(es), phone number(s), electronic mail address(es), taxpayer identification number(s), User Account name(s), password(s), and bank account information that were utilized by the Participants when establishing their User Account(s). Based upon the information provided by Participants, the Portal presented the Participant's User Accounts and account activity within the Participant's User Accounts. Participants had the opportunity to confirm, reject, amend, or supplement the information presented by the Portal.
- 14. The establishment of the Portal was essential to the claims resolution process. The Portal was the only practical method of verifying Participant activity with the TelexFree books and records. Inasmuch as TelexFree had approximately 1,000,000 Participants who collectively opened approximately 11,000,000 User Accounts that reflected more than 1,000,000,000 transactions, a manual reconciliation of Participant Claims against the TelexFree books and records without the Portal would have been impossible.
- 15. To date, approximately 135,000 Participant ePOC's have been filed. The Trustee has reconciled to the TelexFree books and records and conditionally allowed approximately 100,000 Participant ePOC's.

- 16. On October 16, 2017, the Trustee filed a *Motion by Chapter 11 Trustee to*Establish Omnibus Procedures for the Resolution of Disputed Participant Claims (docket entry 921) which was approved by order dated December 26, 2017 (the "Claims Procedure Order", docket entry 955).
- 17. Eight thousand eighty-six (8,086) Participants filed Net Winner Claims, that is, the claims reflected that the Participant received more from TelexFree than they paid to TelexFree, including consideration of amounts received and paid through Triangular Transactions.
- 18. Although not required to by the terms of the Claims Procedure Order, the Trustee sent a letter (the "<u>Claims Letter</u>") electronically to the Net Winner Claim holders at the addresses listed on their claims, providing them with thirty (30) days to submit additional documentation to establish their claims and informing them that, in the absence of additional information, the Trustee would move to have the claims disallowed.
- 19. Two hundred three (203) holders of Net Winner Claims responded to the Claims Letter, and the Trustee is working to resolve these responses.
- 20. Seven thousand seven hundred forty-two (7,742) holders of Net Winner Claims did not respond to the Claims Letter. Based upon the claims submitted by these Participants, these claims are not entitled to receive a distribution from the Estates. Accordingly, the Trustee seeks entry of an order disallowing these claims.
- 21. One hundred forty-one (141) holders of Net Winner Claims did not receive the electronic notice of the Claims Letter based upon KCC's records. These notices were re-sent via regular mail, and the Trustee is reviewing the responses received.

Objection to Net Winner Claims

- 22. The Participants listed on Exhibit "A" hereto filed Net Winner Claims and did not submit a response to the Claims Letter.
- 23. Based upon the information provided in the Participant ePOC's, the Participants listed on Exhibit "A" are not entitled to an allowed claim against the Estates, and the claims should be disallowed.

Notice

- 24. The Trustee has filed herewith a Motion to Approve Form of Notice and a proposed Notice of (I) Motion to Disallow Net Winner Claims, (II) Deadline to Submit Response, and (III) Scheduling of Non-Evidentiary Hearing (the "Notice"). As set forth in the Motion to Approve Form of Notice, the Notice provides information to Participants listed on Exhibit "A" respecting the deadline to respond to this motion, the information to be provided in any response, and the initial, nonevidentiary hearing on the motion. As set forth in the Notice, responses must be sent to ClaimResponse@TelexFree.com.
- 25. The Trustee requests that the form of the Notice be approved on an expedited basis and that it govern the rights and obligations of Participants whose claim is the subject of the motion.
- 26. In accordance with the Claims Procedure Order, the Trustee intends to have this motion translated into Spanish and Portuguese and served upon all Participants referenced in Exhibit "A" hereto.

Wherefore, the Trustee prays that the Court:

Enter an order disallowing each of the Net Winner Claims identified on Exhibit
 "A" hereto; and

2. Granting such other relief as is just and proper.

STEPHEN B. DARR, CHAPTER 11 TRUSTEE, By his attorneys,

/s/ Andrew G. Lizotte

Harold B. Murphy (BBO #362610) Andrew G. Lizotte (BBO #559609) Murphy & King, Professional Corporation One Beacon Street Boston, MA 02108

Dated: July 25, 2019

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EXHIBIT A

Claire Nlear	Clair and No. 11	o	Amount of Claim as	Proposed Allowed	
Claim Number 00492-000	Claimant Name Daniela Vanessa De Freitas	Country of Residence ¹ Portugal	Filed \$ (148,362.69)	Amount Disallowed	Notes
00510-000	Teresa Calvario	Portugal	(3,085.93)	Disallowed	
00533-000	Fernando Benjamin Rondon	Portugal	(18,724.60)	Disallowed	
00555-000	Maria Vanda Dos Santos	Portugal	(4,298.10)	Disallowed	
00569-000	Jose Maria De Freitas	Portugal	(135,930.90)	Disallowed	
01071-000	Ana Cristina Lucas Faia	Portugal	(86,280.60)	Disallowed	
01074-001	Noelia Susana Gomes	Portugal	(12,548.62)	Disallowed	
01163-000	Valter Ascensão Jardim	Portugal	(626.60)	Disallowed	
01290-000	Vira Romaniv	Portugal	(77,471.00)	Disallowed	
01304-000	Joao Miguel Pires Charneca	Portugal	(449.10)	Disallowed	
01690-000	Lyubomyr Romaniv	Portugal	(2,899.90)	Disallowed	
02829-000	Andre Manuel Cardoso Silva	Portugal	(4,224.60)	Disallowed	
03127-000	Jorge Miguel Praia Fradinho Domingues	Portugal	(16,643.60)	Disallowed	2
04465-000	Emikileine Santos Carvalho	Portugal	(169,837.00)	Disallowed	
05118-000	Frederico Nunes	Portugal	(20,534.85)	Disallowed	
07518-000	Edgar Jorge Ornelas	Portugal	(1,145.70)	Disallowed	2
07783-000	Jocelino Pestana Melim	Portugal	(2,852.70)	Disallowed	
09446-000	Teresa Vieira Lima	Portugal	(81,284.90)	Disallowed	
09727-000	Lubelia Quental	Portugal	(917.20)	Disallowed	
09960-000	Humberto Gouveia Fernandes	Portugal	(1,712.00)	Disallowed	
10691-000	José Luís Vieira	Portugal	(1,090.80)	Disallowed	
10706-000	Luis Alberto Andrade	Portugal	(5,700.00)	Disallowed	
11679-000	Luis Filipe Soares	Portugal	(26,748.20)	Disallowed	
13069-000	Wilson Rosino Ramos Silva	Portugal	(20,507.80)	Disallowed	
21386-000	Jeny Jaqueline Macedo De Jesus	Portugal	(1,524.80)	Disallowed	
21433-000	Jeny Jaqueline Macedo De Jesus	Portugal	(1,524.80)	Disallowed	
22840-000	Luzia Donizeti Silverio	Portugal	(90.20)	Disallowed	2
22869-000	Luzia Donizeti Silverio	Portugal	(90.20)	Disallowed	2
23161-000	Paula Cristina De Castro	Portugal	(19,537.90)	Disallowed	
23388-000	Alfredo Jose Ferreira	Portugal	(23,425.70)	Disallowed	
24595-000	Rodrigo Costa	Portugal	(134.20)	Disallowed	
26856-000	Laura Cecilia De Andrade Teixeira	Portugal	(9,875.20)	Disallowed	
27421-000	Goncalo David Alves	Portugal	(22,278.80)	Disallowed	
30432-000	Xavier Vieira	Portugal	(90,527.53)	Disallowed	
30441-000	Maria Dores Jesus Jardim	Portugal	(46,901.10)	Disallowed	
30551-000	Nuno Filipe Madureira Reis	Portugal	(151.44)	Disallowed	2
30941-000	Marcos Cerqueira Rufino	Portugal	(22,310.60)	Disallowed	
30963-000	Maria Manuela Rodrigues Da Silva Duarte Ferreira	Portugal	(5,970.00)	Disallowed	
30967-000	Maria Gloria Fernandes Da Rocha Oliveira Rufino	Portugal	(937.80)	Disallowed	
31193-000	Daniel Medeiros Costa	Portugal	(4,187.00)	Disallowed	
31549-000	Bruno Miguel Santos Cidra Moura	Portugal	(2,003.10)	Disallowed	
32117-000	Ana Lucia Vieira	Portugal	(1,524.80)	Disallowed	
32833-000	Manuel Frois	Portugal	(6,182.10)	Disallowed	
33121-000	Boaventura Ivo Antao	Portugal	(450.10)	Disallowed	
33646-000	Vitaliy Karmatskikh	Portugal	(107,563.90)	Disallowed	
33660-000	Jose Soares	Portugal	(5,799.80)	Disallowed	
33694-000	Maria Clara Freitas Lume	Portugal	(2,899.90)	Disallowed	
33839-000	Fabio Santos Nelson Ferreira Silva	Portugal	(2,176.20)	Disallowed Disallowed	
37215-001 38678-000		Portugal	(75,600.30) (25,155.20)	Disallowed	2
36076-000	Maria Irene Pires Carvalho Rodrigues Irene Carvalho	Portugal	(25,155.20)	Disallowed	2
42531-000	Maria Lurdes Salgado	Portugal	(5,173.20)	Disallowed	
42632-000	Alberto Silva Moreira	Portugal	(838.60)	Disallowed	
43191-000	Diamantino Teixeira Salgado	Portugal	(1,362.70)	Disallowed	
43422-000	Gheorghe Clima	Portugal	(4,830.45)	Disallowed	
44065-000	Joao Andre Sousa	Portugal	(19,170.59)	Disallowed	
44181-000	Jesus Miguel De Gouveia	Portugal	(611.01)	Disallowed	
44183-000	Joel Camacho Lopes	Portugal	(49.90)	Disallowed	
44216-000	Antonio Piedade Vieira Piedade	Portugal	(3,190.99)	Disallowed	
44232-000	Tomas Joao Teixeira Da Silva Coelho	Portugal	(904.31)	Disallowed	
44282-000	José Manuel Alves Sardinha	Portugal	(4,805.00)	Disallowed	
44443-000	André João Fernandes Castro	Portugal	(292,513.45)	Disallowed	
44926-001	Wilson Manuel Aguiar	Portugal	(18,275.50)	Disallowed	
44935-000	Wilson Manuel Aguiar	Portugal	(18,275.50)	Disallowed	
45294-000	Fernando Gapo Martins	Portugal	(74,175.30)	Disallowed	
45407-000	Ismael Figueira Sousa	Portugal	(7,425.10)	Disallowed	
45855-000	Jorge Humberto Martins	Portugal	(8,860.42)	Disallowed	
46350-000	Miguel Dias Albuquerque	Portugal	(10,274.40)	Disallowed	
46736-000	Marilia Cerveira Seco	Portugal	(4,371.20)	Disallowed	
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47210 001	Ibaaaa Iaaa Vii aa Maaallaaa	Dartinal	(2.015.40)	Disallawad
47319-001 49458-000	Jhonny Jose Vivas Magalhaes Maria Ines De Sousa Alves	Portugal Portugal	(3,015.40) (5,260.10)	Disallowed Disallowed
51358-000	Adelino Morais Faria	Portugal	(6,253.34)	Disallowed
51499-000	Maria Gomes Silva	Portugal	(38,000.80)	Disallowed
51546-000	Vanessa Fernandes Aguiar	Portugal	(619.40)	Disallowed
51573-000	Alvina Rodrigues Camara Nobrega	Portugal	(199.60)	Disallowed
52239-000	Milton Aguiar	Portugal	(17,369.20)	Disallowed
52734-000	Teotonio Catanho Da Silva Coelho	Portugal	(1,528.10)	Disallowed
53217-000	Carla Susana Sousa	Portugal	(7,699.90)	Disallowed
53815-000	Hugo Filipe Pereira	Portugal	(4,055.40)	Disallowed
54484-000	Antonio Sergio Vieira Gouveia	Portugal	(16,062.43)	Disallowed
56526-000	Ricardo Jorge Ventura	Portugal	(15,337.60)	Disallowed
56547-000 56567-000	Goncalo Jorge Ventura	Portugal	(28,540.95)	Disallowed
56739-000	Ana Isabel Bastos Anggie Marlene De Freitas Do Nascimento	Portugal Portugal	(299.40) (1,505.30)	Disallowed Disallowed
57034-000	Alexys Teixeira Alves	Portugal	(1,505.30)	Disallowed
57127-000	Maria Alda Santos	Portugal	(1,075.70)	Disallowed
57239-000	Antonio Paulo Alves	Portugal	(3,228.90)	Disallowed
58453-000	Jose Silva Gaspar	Portugal	(2,099.81)	Disallowed
58679-000	Jorge Damas Antunes	Portugal	(1,716.20)	Disallowed
59120-000	Robert Miguel Andrade Castro	Portugal	(3,171.60)	Disallowed
60314-000	Petronella Tam Reichgelt	Portugal	(2,323.12)	Disallowed
60334-000	Sonia Patricia Beato	Portugal	(2,643.40)	Disallowed
60529-000	Vicente Paulo Rodrigues Tavares Rodrigues Tava	res Portugal	(4,573.67)	Disallowed
60534-000	Virgilio Voloca Podriguos	Portugal	(06.057.00)	Disallowed
60740-000	Virgilio Velosa Rodrigues Adriana Gomes Miranda Torres	Portugal Portugal	(96,057.90) (509.50)	Disallowed
63528-000	Maria Da Conceicao Antunes Palhim Neres	Portugal	(6,175.00)	Disallowed
63745-000	Rui Miguel Mendes Ramos	Portugal	(26,339.60)	Disallowed
64793-000	Nadir Maria Santos Pacheco	Portugal	(711.00)	Disallowed
65590-000	Luis Antonio Domingos Mendes	Portugal	(4,484.00)	Disallowed
65774-000	Mario Duarte Vieira Soares	Portugal	(12,892.00)	Disallowed
66580-000	Rui Miguel Mendes Ramos	Portugal	(26,339.60)	Disallowed
67204-000	Rui Antunes Aguas	Portugal	(1,028.50)	Disallowed
67339-000	Tanya Angelica Salgado	Portugal	(1,175.50)	Disallowed
68068-000	Pedro Bandeira Maia	Portugal	(425.02)	Disallowed
68796-001	Fernanda Nadais Ferreira	Portugal	(7,415.55)	Disallowed
68832-000	Marco Vieira Fereeira	Portugal	(13,903.48)	Disallowed
69059-000	Marco Miguel Pereira Sousa	Portugal	(860.10)	Disallowed
69768-000	Ivone Marta Gomes De Andrade	Portugal	(13,174.30)	Disallowed
70235-000	Vitalii Bejenaru	Portugal	(1,704.30)	Disallowed
70272-000 71630-000	Marina Maksimova Fernando Jose Silva Teodosio	Portugal Portugal	(12,825.50) (2,525.10)	Disallowed Disallowed
71637-000	Francisco Pita	Portugal	(3,514.00)	Disallowed
71746-000	Lissette Faria Chaves	Portugal	(4,251.60)	Disallowed
71875-000	Lissette Faria Chaves	Portugal	(4,251.60)	Disallowed
71940-000	Antonio Feliciiano Santos	Portugal	(2,059.72)	Disallowed
72142-000	Cizaltina Silva	Portugal	(1,108.30)	Disallowed
72603-000	Luis Manuel Silva Queirós	Portugal	(2,116.60)	Disallowed
74096-000	Xavier Agrela De Barros	Portugal	(8,816.33)	Disallowed
74148-000	Jailson Silva De Souza	Portugal	(22,634.74)	Disallowed
74556-000	Pedro Miguel Lourenco Ferreira	Portugal	(6,455.90)	Disallowed
75141-000	Elisabete Oliveira Nascimento Jorge	Portugal	(24,138.69)	Disallowed
75314-000	Helder Filipe Pessoa Neves	Portugal	(1,340.70)	Disallowed
75925-000	Hugo Alexandre Rodrigues Ferreira	Portugal	(4,168.20)	Disallowed
76599-001	David Joaquim Silva	Portugal	(4,275.00)	Disallowed
76878-000 77003-000	Rafael De Paula Carvalho Carlos De Jesus Camacho	Portugal	(6,366.69) (2,899.90)	Disallowed Disallowed
77168-000	Vera Lucia Neves Paula	Portugal Portugal	(2,899.90)	Disallowed
77179-000	Cristiano Alberto Sousa	Portugal	(1,596.10)	Disallowed
77247-000	Mario Goncalves Silva	Portugal	(11,941.90)	Disallowed
78342-000	Claudia Martins Rodrigues Borges	Portugal	(18,085.60)	Disallowed
78753-000	Yevgen Domanchenko	Portugal	(1,073.00)	Disallowed
79903-000	Pedro Coias Silva	Portugal	(300.00)	Disallowed
80027-000	Maria Cidalia Mata Vieira	Portugal	(39,175.37)	Disallowed
80047-000	Felicidade Rosa Silva Freitas	Portugal	(5,680.60)	Disallowed
80051-000	Teresa Mendes	Portugal	(2,571.54)	Disallowed
80094-000	Carlos Manuel Gouveia Vieira	Portugal	(8,310.20)	Disallowed
80209-000	Isidro Quintal Vieira	Portugal	(6,985.70)	Disallowed
80958-000	Basilio Elias Filho	Portugal	(2,355.90)	Disallowed
			(4.054.50)	
81445-000 81915-000	Joaquim Henrique Machado Colelho Leal José Carlos Silva Couto	Portugal Portugal	(1,251.50) (11,359.50)	Disallowed Disallowed

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32253-000	Adelino Sequeira Pequenesa	Portugal	(31,818.21)	Disallowed
33701-000	José Cerejeira Leitão	Portugal	(65,527.20)	Disallowed
34024-000	Carlos Manuel Felix	Portugal .	(1,924.00)	Disallowed
34439-000 35617-000	Fernando Fonseca Silva Rubino Perestrelo Ferreira	Portugal	(103,585.10)	Disallowed Disallowed
35994-000	Gisela Candida Nogueira	Portugal Portugal	(754.50) (15,161.27)	Disallowed
36453-000	Vanessa Carolina Pereira	Portugal	(345.00)	Disallowed
36559-000	Amaro Luís Silva Franca Luís Franca	Portugal	(3,270.90)	Disallowed
36604-000	Maria Fernanda Moutinho	Portugal	(39,926.21)	Disallowed
36727-000	Maria Fátima Silva Franca Fatima Franca	Portugal	(16,150.80)	Disallowed
37566-000	Maria Fernandes Pereira	Portugal	(993.70)	Disallowed
37591-000	Agostinho Esteves Araujo	Portugal	(19,115.40)	Disallowed
37678-000	Maria Fernanda Da Silva Lima Araujo	Portugal	(1,366.90)	Disallowed
37947-000 38186-000	Jose Manuel Santos Pimenta Eurico Caldas	Portugal Portugal	(10,851.10) (142.30)	Disallowed Disallowed
39843-000	Marco Remesso Silva	Portugal	(1,196.00)	Disallowed
91383-000	Celestina Teixeira Da Silva De Ornelas	Portugal	(22,039.00)	Disallowed
92205-000	Angela Patricia Santos	Portugal	(948.70)	Disallowed
96041-000	Alvaro Manuel Quinteiro Pereira Santos	Portugal	(132,915.26)	Disallowed
96512-000	Susana Cristina Dias	Portugal	(4,149.00)	Disallowed
97043-000	Rogerio Manuel Margarido	Portugal	(7,723.80)	Disallowed
97105-000	Susana Gouveia	Portugal	(51,006.20)	Disallowed
97515-000	Rita Margarida Bento Domingos Margaria Doming	os Portugal	(698.60)	Disallowed
98786-000	Rodolfo Alexandre Silva	Portugal	(23,211.30)	Disallowed
99595-000	Joao Mauricio Quintal	Portugal	(53,723.60)	Disallowed
99728-000	Maria Alexandrina Cardoso Leal	Portugal	(37,324.40)	Disallowed
99752-000	Marisa Nobrega	Portugal	(5,630.00)	Disallowed
100110-000	Maria Pulqueria Nobrega	Portugal	(5,790.00)	Disallowed
100221-000	Rodrigo Marques Santana	Portugal	(21,445.66)	Disallowed
100290-000	Pedro Miguel Mendonca	Portugal	(41,658.10)	Disallowed
100685-000	Jose Daniel Pereira	Portugal	(99.80)	Disallowed
L00972-000 L01124-000	Sara Ribeiro Monteiro Irene Jose Rodrigues	Portugal Portugal	(12,075.40) (84,473.20)	Disallowed Disallowed
101202-000	Maria Jose Rodrigues Portela	Portugal	(24,007.36)	Disallowed
101337-000	Rui Meira Costa	Portugal	(7,349.50)	Disallowed
101798-000	Rita Da Silva Araujo	Portugal	(2,063.30)	Disallowed
L01952-000	Aldonio Jose Corte Nascimento	Portugal	(11,549.70)	Disallowed
102281-000	José António Viveiros	Portugal	(152,897.40)	Disallowed
102518-000	Patricia Barros Freitas	Portugal .	(1,935.80)	Disallowed
102597-000	Veronica Gonçalves	Portugal	(173,113.64)	Disallowed
L03431-000 L03801-000	Juan Pedro Ribeiro Pedro Claudio Vasconcelos	Portugal Portugal	(6,188.70) (3,128.10)	Disallowed Disallowed
L04064-000	Paulo Alves	Portugal	(25,672.20)	Disallowed
104552-000	João Martins Correia De Almeida	Portugal	(3,797.90)	Disallowed
107554-000	Silvio Martim Freitas	Portugal	(10,905.80)	Disallowed
108182-000	Vitor Manuel De Sousa Rodrigues	Portugal	(1,764.00)	Disallowed
108204-000	Vitor Manuel De Sousa Rodrigues	Portugal	(1,764.00)	Disallowed
108590-000	Antonio Fernando Gomes Nascimento	Portugal	(706.70)	Disallowed
109078-000	Carla Isabel Costa	Portugal	(1,302.80)	Disallowed
109200-001	Luis Vieira	Portugal	(17,009.00)	Disallowed
.09238-000 .09514-000	Helena Isabel Gomes Zenobia Maria De Oliveira Frescata	Portugal Portugal	(1,188.50) (388.80)	Disallowed Disallowed
.09719-000	Anabela Fatima Goncalves Gomes Fatima Gomes	Portugal	(42,965.75)	Disallowed
09935-002	Rui Nuno Trindade Ornelas	Portugal	(2,176.20)	Disallowed
10170-000	Nelson Eduardo Sousa	Portugal	(14,810.50)	Disallowed
10261-000	Jorge Edgar Santos	Portugal	(5,628.50)	Disallowed
10285-000	Jorge Edgar Santos	Portugal	(5,628.50)	Disallowed
10554-000	David Nuno Camacho	Portugal	(20,099.70)	Disallowed
11073-000	Hermenegildo Santos Alexandre	Portugal	(3,199.60)	Disallowed
11218-000 11234-000	Marcia Mata Ornelas Jose Gabriel Marques Abreu	Portugal Portugal	(9,975.00) (2,331.10)	Disallowed Disallowed
11275-000	Tania Crsitna De Castro Azevedo	Portugal	(2,331.10)	Disallowed
	Carmen Dolores Andrade De Freitas	Portugal	(15,700.17)	Disallowed
11645-000	Jose Antonio Santos	Portugal	(5,628.50)	Disallowed
	JOSE AIRONIO SUNTOS			District and
12222-000	Joao Miguel Vieira	Portugal	(19,817.60)	Disallowed
12222-000 12253-000	Joao Miguel Vieira Fabiano Natali Mazuco	Portugal Portugal	(2,800.70)	Disallowed
11645-000 12222-000 12253-000 12831-000 13124-000	Joao Miguel Vieira Fabiano Natali Mazuco Maria Salome Teixeira Dos Passos Goncalves	Portugal Portugal	(2,800.70) (29,459.30)	Disallowed 2
12222-000 12253-000 12831-000 13124-000 13158-000	Joao Miguel Vieira Fabiano Natali Mazuco Maria Salome Teixeira Dos Passos Goncalves Alexandra Carolina Tosta	Portugal Portugal Portugal	(2,800.70) (29,459.30) (5,700.00)	Disallowed Disallowed 2 Disallowed
12222-000 12253-000 12831-000 13124-000	Joao Miguel Vieira Fabiano Natali Mazuco Maria Salome Teixeira Dos Passos Goncalves	Portugal Portugal	(2,800.70) (29,459.30)	Disallowed 2

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117409-000	Nelly Ivonne Sequeira	Portugal	(11,537.30)	Disallowed
117567-000	Jose Carlos Guimaraes Do Canto Moreira	Portugal	(7,690.80)	Disallowed
117843-000	Fernando Manuel Mineiro	Portugal	(2,313.50)	Disallowed
118154-000	Neuton Rodrigues Matos	Portugal	(61,152.40)	Disallowed 2
118334-000	Serafina Pinto Gomes	Portugal	(19,752.80)	Disallowed
118840-000	Alice Cristina Costa	Portugal	(11,889.60)	Disallowed
118928-000	Carlos Miguel Silva Castro	Portugal	(1,574.70)	Disallowed
119032-000	Ftima Vieira	Portugal	(58,951.30)	Disallowed
119040-000	Andre Garcia	Portugal	(42,359.00)	Disallowed
119161-000	Jose Carlos Gomes Martinho	Portugal	(78,626.82)	Disallowed
120482-000	Damaris Soares Raimundo Calinas	Portugal	(5,052.80)	Disallowed
120658-000	Walter Dividorio Junior	Portugal	(23,894.18)	Disallowed
121447-000	Carlos Freitas De Abreu	Portugal	(34,346.40)	Disallowed
121506-000	Jose Gama Almeida	Portugal	(81,137.54)	Disallowed
121760-000	Georgy Katsanov	Portugal	(590.20)	Disallowed
122751-000	Cristina Rodrigues Felix	Portugal	(1,418.20)	Disallowed
122910-000	Manuel Fernando Cruz Santos	Portugal	(16,074.50)	Disallowed
122932-000	Elmina Conceição Moiteiro Carvalho	Portugal	(71.80)	Disallowed
125003-000	Ana Margarida Consiglieri Raposo Machado Carvalho	Portugal	(19,635.80)	Disallowed
	Cruz			
126776-000	Sara Divina Gomes De Menezes	Portugal	(5,908.70)	Disallowed
126918-000	Ligia Santos Sena	Portugal	(32,767.64)	Disallowed
127069-000	Fernanda Cordeiro Lopes Goncalves	Portugal	(1,855.00)	Disallowed
127296-000	Paulo Jorge Camiso	Portugal	(1,140.70)	Disallowed
127801-000	Sonia Gonzaga De Barros	Portugal	(10,515.79)	Disallowed
128014-000	Rosaria Fatima Corte Valentim	Portugal	(600.80)	Disallowed
128016-000	Bruno Miguel Moniz Freitas	Portugal	(14,073.20)	Disallowed
129059-000	Jose Luis Cunha Goncalves	Portugal	(32,990.94)	Disallowed
130257-000	Camila Ferraz Lucena	Portugal	(48,350.34)	Disallowed
131186-001	Jose Castro	Portugal	(349.30)	Disallowed
131559-000	Jose Adilio Andrade Ornelas	Portugal	(19,677.00)	Disallowed
131560-000	Ricardo Edgar Freitas	Portugal	(20,071.51)	Disallowed
131564-000	Manuel Sousa Ferreira	Portugal	(17,112.40)	Disallowed
132941-000	Maria Salome Texeira Dos Passos Goncalves	Portugal	(29,459.30)	Disallowed
00135-000	Francisco Xavier Llanos	Puerto Rico	(10,655.90)	Disallowed
01495-000	Evelyn Alamo Del Valle	Puerto Rico	(2,850.00)	Disallowed
01507-000	Orlando Rafael Lopez Felix	Puerto Rico	(4,026.80)	Disallowed
02380-000	Juan Luis Vazquez Vega	Puerto Rico	(3,407.21)	Disallowed
02613-000	Francisco Uvita Ramos Álvarez	Puerto Rico	(5,992.40)	Disallowed
04285-000	Francisco Uvita Alvarez	Puerto Rico	(4,187.60)	Disallowed
04490-000	Johnny Borrero Borreli	Puerto Rico	(480.90)	Disallowed
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Notes

^{1:} Country of Residence as entered by Claimant on the claim form filed electronically.

^{2:} Claimant did not identify his or her name in the "Creditor Name" field of the claim form, and therefore claimant name was derived from the "Signature" field. The "Notice" and "Registration" fields were also considered as necessary.