

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

**In Re:**

**TELEXFREE, LLC,  
TELEXFREE, INC.,  
TELEXFREE FINANCIAL, INC.,**

**Debtors.**

**Chapter 11**

**Case No. 14-40987-MSH**

**Case No. 14-40988-MSH**

**Case No. 14-40989-MSH**

**Jointly Administered**

**THIRTY-THIRD 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 Thirty-Third 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 "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code ("Bankruptcy Code") 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 “Triangular Transaction”, 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

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 “User Account”) 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*

*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 “Claims Letter”) 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. The Trustee previously filed thirty-two (32) motions to disallow Net Winner Claims. The Participants who are the subject of this motion were not included in prior motions to disallow claims because such Participants submitted a response in some form to the Claims Letter. The Trustee has conducted a more extensive review of the claims for which a response was received and, after completing his review, the Trustee has determined that the claims should be disallowed.<sup>1</sup>

### **Objection to Net Winner Claims**

20. The Participants listed on Exhibit “A” hereto filed Net Winner Claims.

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<sup>1</sup> The Trustee has separately commenced adversary proceedings seeking affirmative recovery from Net Winners in the TelexFree scheme (Adv Proc Nos. 16-4006 and 16-4007). This motion does not seek determination of any rights of the Trustee to affirmative recovery but rather seeks only to disallow the Net Winner Claims for purposes of participating in any distributions by the Estates.

21. 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**

22. The Trustee requests that he be authorized to serve the *Notice of (I) Motion to Disallow Net Winner Claims, (II) Deadline to Submit Response, and (III) Scheduling of Non-Evidentiary Hearing* (the "Notice") approved by the Court on July 29, 2019 with respect to this motion. As set forth in the Notice, responses must be sent to

**ClaimResponse@telexfreeclaims.com.**

23. 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:

1. 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: December 30, 2019  
768099

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Amount of Claim as	Proposed Allowed	Notes
			Filed	Amount	
92266-000	Sona Ghukasyan	Armenia	\$ (100.40)	Disallowed	
34472-000	Ben Piltz	Australia	(2,136.00)	Disallowed	
73925-000	Olga Muzychenka	Belarus	(100.40)	Disallowed	
05356-000	Telexfree Goncalves De Oliveira	Brazil	(589.60)	Disallowed	
05365-000	Telexfree Darla Carvalho	Brazil	(589.60)	Disallowed	
05640-000	Jose Marcos Felipe Da Silva	Brazil	(200.30)	Disallowed	
05645-000	Jose Marcos Felipe Da Silva	Brazil	(200.30)	Disallowed	
10325-000	Cardoso Magno Carlos	Brazil	(5,756.03)	Disallowed	
18343-000	Suzete De Castro Silva	Brazil	(7,398.60)	Disallowed	
20659-002	Jefferson Lopes	Brazil	(3,916.36)	Disallowed	
32887-000	Marilene Mariano Mattos	Brazil	(60.20)	Disallowed	
46111-000	Marcos Fabricio	Brazil	(22,638.14)	Disallowed	
49005-000	Claudio Junio Custodio	Brazil	(20,224.40)	Disallowed	
66595-000	Daniel Da Silveira Schutz	Brazil	(3,948.50)	Disallowed	
73185-000	Patricia Aparecida Lemes Ramos Da Silva	Brazil	(2,515.80)	Disallowed	
99893-000	Clauderson Marques Cunha	Brazil	(489.30)	Disallowed	
123232-000	Ivandro Marciano Leite	Brazil	(7,106.40)	Disallowed	2
25718-000	Augusto De Jesus	Canada	(7,237.20)	Disallowed	
116452-000	Julio Cruces Carvallo	Chile	(1,719.30)	Disallowed	
02777-000	Xin Xin Liu	China	(17,095.20)	Disallowed	
02786-000	Fengan Fengan Liu	China	(37,526.10)	Disallowed	
02813-000	Yang Yang Yang	China	(12,198.40)	Disallowed	
02815-000	Yang Yang Yang	China	(12,198.40)	Disallowed	
02816-000	Yang Yang Yang	China	(12,198.40)	Disallowed	
02828-000	Yang Yang Yang	China	(12,198.40)	Disallowed	
02843-000	Xin Xin Liu	China	(17,095.20)	Disallowed	
05478-000	Bin Zhang	China	(253.80)	Disallowed	
05802-000	Red Zhang	China	(9,227.60)	Disallowed	
07645-000	Bin Wang	China	(801.10)	Disallowed	
07668-000	Bin Wang	China	(801.10)	Disallowed	
07795-000	Fengan Fengan Liu	China	(37,526.10)	Disallowed	
93965-000	Ru Li	China	(5,393.30)	Disallowed	
112283-000	Ruiling Xu	China	(149.70)	Disallowed	
62124-000	Rosa Stella Pineda Rueda Rosa Stella Pineda Rueda	Colombia	(2,331.65)	Disallowed	
00028-002	Juan Carlos De Los Santos	Dominican Republic	(4,187.60)	Disallowed	
02400-000	Joan Luis Gonzalez	Dominican Republic	(1,375.00)	Disallowed	
18130-000	Ysidro Sanchez Cruz	Dominican Republic	(10,242.10)	Disallowed	
22081-000	Jose Manuel Figueroa	Dominican Republic	(1,988.10)	Disallowed	
23206-000	Ramona Adalgisa Fernandez Vargas	Dominican Republic	(2,323.20)	Disallowed	
23313-000	Will Vallon	Dominican Republic	(3,349.27)	Disallowed	
27410-001	Gregorio Ernesto Melo Medina	Dominican Republic	(6,351.60)	Disallowed	
36013-000	Cecilia Gonzalez Diaz	Dominican Republic	(49.90)	Disallowed	
36245-000	Cecilia Gonzalez Diaz	Dominican Republic	(49.90)	Disallowed	
45550-000	Francisco Tamarez	Dominican Republic	(183,662.65)	Disallowed	
48630-000	Joan Ramon Rivera Cedano	Dominican Republic	(6,002.85)	Disallowed	
72645-000	Jose Joaquin Colon Pena Joaquin Colon	Dominican Republic	(383.07)	Disallowed	
79207-000	Domingo Antonio Perez	Dominican Republic	(300.00)	Disallowed	
49963-000	Diana Isabel Moncayo	Ecuador	(2,173.50)	Disallowed	
119504-000	Diego Fernando Llumitaxi	Ecuador	(2,029.20)	Disallowed	
21648-000	Marvin Ernesto Posada Joaquin	El Salvador	(3,721.90)	Disallowed	
09276-000	Wilson Tehoda	Ghana	(21,540.50)	Disallowed	
63849-000	Feliciana De Jesus Ramrez Martinez	Guatemala	(16,549.20)	Disallowed	
04041-000	Maybelin Paola Bustamante Ardon	Honduras	(11,390.91)	Disallowed	
30360-000	Angel Emin Valerio	Honduras	(9,360.50)	Disallowed	
43665-000	Siu Yung Wong	Hong Kong	(11,840.10)	Disallowed	
43707-000	Fung Cheung Chow	Hong Kong	(22,759.40)	Disallowed	
119289-000	Fung Cheung Chow	Hong Kong	(12,784.40)	Disallowed	
89295-000	Dolly Jacob	India	(197.00)	Disallowed	
107825-000	Raj Kaur Bakhtwar Singh Tattla Tattla	India	(3,859.30)	Disallowed	
45795-000	Cristina Boenner	Italy	(14,759.80)	Disallowed	
101230-000	Marat Yermekeshev	Kazakhstan	(97,910.00)	Disallowed	
10771-000	Joseph Wachagui Gathi	Kenya	(546.30)	Disallowed	
13266-000	Vasili Vasili Valentir	Moldova	(2,216.40)	Disallowed	
54577-000	Daniel Joseph Higgins	New Zealand	(11,440.80)	Disallowed	
11771-000	Kehinde Habib Oyafajo	Nigeria	(7,294.60)	Disallowed	

Exhibit A to Thirty-Third Motion To Disallow Net Winner Claims

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Amount of Claim as Filed	Proposed Allowed Amount	Notes
64855-000	Goodhead Frank Enyinnaya	Nigeria	(6,911.10)	Disallowed	
100484-000	Nwanna Joy John	Nigeria	(3,771.70)	Disallowed	
127060-001	Rogesin Oluwaniyi	Nigeria	(1,569.00)	Disallowed	
03050-000	Ernesto Daniel Fernandez Rey	Peru	(60,774.90)	Disallowed	
07942-000	Josue Pablo Sierralta Beltran	Peru	(43,369.55)	Disallowed	
19623-000	Willy Elam Recharte	Peru	(3,364.70)	Disallowed	
63708-000	Rolo Fredy Venancio Vidal	Peru	(108,407.60)	Disallowed	
84932-000	Blanca Gavi Caverro Villegas	Peru	(6,978.00)	Disallowed	
87490-000	Edgar Tuesta Ramos	Peru	(2,674.65)	Disallowed	
89020-000	Brenda Bravo Caverro	Peru	(4,714.40)	Disallowed	
89290-000	Devora Paola Molero Caverro	Peru	(99.80)	Disallowed	
107465-000	Albert Douglas Pacheco Carhuarupay	Peru	(539.20)	Disallowed	
115239-000	Catty Reyes Huaman	Peru	(2,176.20)	Disallowed	
121262-000	Nehemias Acevedo Llacctas Acevedo Llacctas	Peru	(27,802.50)	Disallowed	
121442-000	Denis Cabrera Mendoza	Peru	(7,058.35)	Disallowed	
121443-000	Denis Cabrera Mendoza	Peru	(7,058.35)	Disallowed	
124810-000	Carlos Alberto Arrieta Vega	Peru	(5,360.10)	Disallowed	
02911-000	Maria Da Luz Ribeiro De Sousa Pereira	Portugal	(24,279.50)	Disallowed	2
31234-000	Paulo Jose Gomes Palma	Portugal	(7,127.75)	Disallowed	
96907-000	Maria Leocadia Garcia Branco	Portugal	(7,174.90)	Disallowed	
109653-000	Ana Raquel Costa	Portugal	(18,695.50)	Disallowed	
124210-000	Fernando Paiva	Portugal	(9,415.60)	Disallowed	
00342-000	Jean Chrysostome Bikomeye	Rwanda	(600.75)	Disallowed	
15486-000	Rukoro Bizigira Alain	Rwanda	(49.90)	Disallowed	
19439-000	Rukoro Bizigira Alain	Rwanda	(49.90)	Disallowed	
97049-000	Jean Dela Croix Gatete	Rwanda	(27,200.10)	Disallowed	2
121322-000	Jeandelacroix Gatete	Rwanda	(27,200.10)	Disallowed	2
121325-000	Jeandelacroix Gatete	Rwanda	(2,412.70)	Disallowed	2
121328-000	Jeandelacroix Gatete	Rwanda	(5,212.80)	Disallowed	2
121332-000	Jeandelacroix Gatete	Rwanda	(5,212.80)	Disallowed	2
121605-000	Jeandelacroix Gatete	Rwanda	(27,200.10)	Disallowed	2
121606-000	Jeandelacroix Gatete	Rwanda	(5,974.70)	Disallowed	2
121615-000	Jeandelacroix Gatete	Rwanda	(3,136.80)	Disallowed	2
04198-000	M <sup>a</sup> Pilar Rodríguez Vidal	Spain	(6,551.00)	Disallowed	
04646-000	M <sup>a</sup> Pilar Rodríguez Vidal	Spain	(7,239.90)	Disallowed	
04649-000	M <sup>a</sup> Pilar Rodríguez Vidal	Spain	(6,551.00)	Disallowed	
07991-000	Julian Mittelman	Spain	(1,425.00)	Disallowed	
17983-000	Joan Pere Fornis Mateu	Spain	(839.22)	Disallowed	
56761-000	Santiago Bravo Pozo	Spain	(3,294.93)	Disallowed	
60506-000	Angel Maria Osuna Luque	Spain	(299.40)	Disallowed	
62069-000	Juan Aunon Negrillo Aunon Negrillo	Spain	(6,457.60)	Disallowed	
73750-000	Francisco Pedro Almodovar Sanchez	Spain	(21,601.60)	Disallowed	
102144-000	Francisco Javier Fernandez Martos Machado	Spain	(127.70)	Disallowed	
102765-000	Nancy Edith Fassina Pascual	Spain	(44,502.50)	Disallowed	2
117846-000	Jose Miguel Munoz Perez	Spain	(1,976.60)	Disallowed	
123153-000	Eva Maria Garnes Ruiz	Spain	(25,898.50)	Disallowed	
129131-001	Carlos Amador Cabanillas Becerra Amador Cabanillas	Spain	(65,465.40)	Disallowed	
	Becerra				
129259-000	Carlos Amador Cabanillas Becerra Carlos Cabanillas	Spain	(65,465.40)	Disallowed	
129648-000	Lucas Horacio Becerra Malca Horacio Becerra	Spain	(1,050.60)	Disallowed	
27377-000	Chan Yuan Chang	Taiwan	(38,548.80)	Disallowed	
71782-000	Ssu Yi Lin	Taiwan	(5,799.80)	Disallowed	
71844-000	Tai Tzu Lee	Taiwan	(1,574.70)	Disallowed	
81744-000	Chiung Tzu Su	Taiwan	(14,598.00)	Disallowed	
84856-000	Wei Ling Chen	Taiwan	(1,724.40)	Disallowed	
84950-000	Chih Hua Lee	Taiwan	(3,032.80)	Disallowed	
89140-000	Pin Hsun Lee	Taiwan	(1,642.30)	Disallowed	
99072-000	Shu Hsiang Lee	Taiwan	(898.20)	Disallowed	
100523-000	Chan Yuan Wang	Taiwan	(61,377.40)	Disallowed	
116453-000	Fan Su	Taiwan	(14,598.00)	Disallowed	
69564-000	Simon Odoch	Uganda	(14,246.20)	Disallowed	
89707-000	Mukenye Samson	Uganda	(1,088.10)	Disallowed	
90482-000	Nabeeta Andrew	Uganda	(3,429.10)	Disallowed	
99163-000	Nabeeta Andrew	Uganda	(3,429.10)	Disallowed	
30488-000	Kevin Hall	United Kingdom	(1,927.10)	Disallowed	



Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Amount of Claim as	Proposed Allowed	Notes
			Filed	Amount	
00557-000	Marcel H Agnolin	United States	(37,157.70)	Disallowed	
00858-000	Jose Anibal Bello	United States	(17,201.30)	Disallowed	
01850-000	Taiwo Christopher Adejobi	United States	(11,207.50)	Disallowed	
02099-000	Anne Njeri Mbugua	United States	(2,450.10)	Disallowed	
03217-000	Lyubov Yakir	United States	(51,654.80)	Disallowed	
03730-000	Heng Sovannra	United States	(1,000.70)	Disallowed	
04405-000	Keith Earl Forester	United States	(26,279.02)	Disallowed	
04487-000	Gildo Pereira Marques	United States	(9,390.60)	Disallowed	
08166-000	Gloria E Mazzio	United States	(14,460.20)	Disallowed	
09319-000	Petr Yagyaev	United States	(21,583.48)	Disallowed	
09367-000	Caroline Kaigai	United States	(570.10)	Disallowed	
09558-000	Rosette Baseka	United States	(61,502.92)	Disallowed	
09853-000	Carlos Andres Montiel	United States	(1,425.00)	Disallowed	
10089-000	Lee Por Xiong	United States	(7,297.40)	Disallowed	2
13196-000	Elena Manzueta	United States	(339.60)	Disallowed	
18206-000	Svetlana Margolina	United States	(8,701.20)	Disallowed	
18763-000	Svetlana Margolina	United States	(28,701.20)	Disallowed	
23711-000	Luis Arce	United States	(15,509.68)	Disallowed	
27763-000	Oto Ranzoni Gomes	United States	(7,145.27)	Disallowed	
27792-000	Sam Farra	United States	(62,916.11)	Disallowed	
35812-000	Modesto Maldonado	United States	(8,852.20)	Disallowed	
36927-000	Kerry Lynn Chavis	United States	(24,250.50)	Disallowed	
36942-000	Fernando Solis	United States	(2,516.20)	Disallowed	
38139-000	Toni P Scolaro	United States	(208,297.26)	Disallowed	
39273-000	Omar L Fernandez	United States	(70.00)	Disallowed	
45301-000	Yara Aixa Acosta	United States	(29,438.93)	Disallowed	
45448-000	Nora Eliana Hernandez Avila	United States	(10,671.50)	Disallowed	
46597-000	Jairo Ardila	United States	(12,213.60)	Disallowed	
49504-000	Marceliana Hodas	United States	(1,500,533.33)	Disallowed	
50915-000	Stephen Anthony Lambkin	United States	(12,846.20)	Disallowed	
52952-000	Sylvia Munoz	United States	(3,656.22)	Disallowed	
53746-000	Denizhan Ozturk	United States	(349.30)	Disallowed	
54853-000	Oladiuppo Adesina	United States	(10,544.35)	Disallowed	
57695-000	Miguelina Vargas	United States	(2,602.40)	Disallowed	
59474-000	Nonna Gomberg	United States	(799.80)	Disallowed	
59826-000	Ronald Heinrich Looney	United States	(25,831.82)	Disallowed	
60234-000	Glenda Ivette Agostini-Miranda	United States	(1,275.30)	Disallowed	
60250-000	Juan Gabriel Ramirez	United States	(2,525.10)	Disallowed	
63028-000	Juan Francisco Padron Trillo Francisco Padron	United States	(2,398.80)	Disallowed	
63805-000	Raul Junior Escobar	United States	(3,139.10)	Disallowed	
64437-000	Kwikook Kim	United States	(89,749.50)	Disallowed	
66187-000	Sydney Hagen	United States	(3,503.92)	Disallowed	
67120-000	Adam Oliveira	United States	(189,380.90)	Disallowed	
67474-000	Carlos Correa	United States	(32,458.12)	Disallowed	
68813-000	Jeffrey Manalili	United States	(3,066.00)	Disallowed	2
71016-000	Ronald Ylanan Tan	United States	(38,114.85)	Disallowed	
74628-000	Sybil Renea Oneal	United States	(49.90)	Disallowed	
81032-000	Marcio Oliveira	United States	(5,858.60)	Disallowed	
87362-000	Graciela Flores	United States	(10.20)	Disallowed	2
87982-000	Rubiela Lopez	United States	(1,896.20)	Disallowed	
88315-000	Antonina Jaime	United States	(24,533.48)	Disallowed	
95827-000	Elena Manzueta	United States	(728.50)	Disallowed	
97120-000	Jose Efrain Osorio	United States	(1,650.80)	Disallowed	
102982-001	Manoel Batista Silva	United States	(898.20)	Disallowed	
105131-001	Emmanuel N Ndenga	United States	(41,681.30)	Disallowed	
107455-000	Walter Patricio Alvarado	United States	(4,595.05)	Disallowed	
107707-000	Song Her Yang	United States	(1,724.40)	Disallowed	
115754-000	Edelzamar J Da Silva	United States	(2,999.70)	Disallowed	
120571-000	Roshel Aminov	United States	(76,587.30)	Disallowed	
126482-000	Juan B Chile	United States	(5,684.84)	Disallowed	
126523-000	Andris Jean	United States	(432.40)	Disallowed	
126932-000	Rebecca Chebet Kibett	United States	(2,772.30)	Disallowed	
127473-000	Peterson Pereira	United States	(2,683.70)	Disallowed	
127592-000	Robert James Houchin	United States	(6,215.01)	Disallowed	
127783-000	Lee Por Xiong	United States	(6,247.20)	Disallowed	
129310-000	Claudio Batista Dos Anjos	United States	(268,365.50)	Disallowed	

Exhibit A to Thirty Third Motion To Disallow Net Winner Claims

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Amount of Claim as	Proposed Allowed	Notes
			Filed	Amount	
129616-000	Basilio Florian	United States	(1,997.20)	Disallowed	
130446-000	Odete Czremeta	United States	(29,376.40)	Disallowed	

**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.