

Receiver was present for a portion of the meeting by telephone. The Receiver was requested to provide indemnity to ING Bank, if it agreed to transfer a portion of the funds in the ING accounts to the Receiver. The amount to be transferred would be slightly in excess of EUR 3 million. The Receiver has agreed to provide indemnity to the extent others later make claims against ING for having transferred the funds to the Receiver. The indemnity will only apply to funds in the Receivership estate and not to the Receiver's personal assets.

4. Before the DPPO will agree to lift the attachments on the ING accounts, ING will also be required to provide a similar indemnity to the DPPO. ING's counsel is preparing the documents which will hopefully allow for the lifting of the attachments and the transfer of funds in the ING Accounts.

5. The Receiver continues in his attempts to serve Massachusetts resident Jennifer Marie Weare. Ms. Weare was the sole director of Randius Ltd. In this regard, the Receiver has retained a constable from Massachusetts which has attempted to serve Ms. Weare at five different locations that have been provided by the Receiver from various sources. The Receiver is going to make one last attempt to obtain personal service on Ms. Weare. If unsuccessful, the Receiver will seek to have her served by alternative means.

6. The answer date for the other Relief Defendants sued by the Receiver has passed. Only one of the Relief Defendants filed an Answer. The Receiver will soon be filing motions for default judgments against those defendants that did not file an Answer. If default judgments are obtained, the Receiver will present them to the financial institutions in the foreign jurisdictions holding assets in the defendants' names. It is hoped this will result in the financial institutions transferring the assets to the Receivership Estate. One of those accounts is located in Cyprus and is reported to contain approximately USD \$8 million.

7. Subsequent to the meeting on January 6, 2020, the Dutch Prosecutor made a settlement proposal to counsel for Rabia Moutaouakkil (Emad Echade's mother). If the proposal is accepted, Ms. Moutaouakkil would be required to consent to the transfer of approximately USD 3.1 million into an account to be designated by the Receiver. In addition, Ms. Moutaouakkil would have to execute conveyance documents for approximately five parcels of Moroccan real estate to the Receiver. The total value of the funds and the real estate is expected to be in the range of USD 4-5 million.

8. In order to cure an objection made by the DPPO and ING's counsel to release the ING Accounts, the Receiver previously retained legal counsel from London to have IB Capital and Maverick restored to the Registrar of Companies. The Receiver's UK counsel reports that progress is being made on the Maverick application and less so on the IB Capital application. It appears only a small amount of additional material will be required to have Maverick reinstated. A full hearing and possibly a trial might be required to have IB Capital reinstated. Given the recent agreement with ING's counsel and the DPPO which are in the process of being documented, the Receiver has instructed his UK counsel to minimize expenses of that process to the extent possible.

9. The Receiver would like to note, due to multiple jurisdictions and funds that have reverted to the crown, summons issued for the Relief Defendants, translation costs, and the Receiver's local Dutch counsel, the Receiver paid numerous invoices which are included are attached as exhibit "A". The Receiver deems it critical to distribute funds, in a timely manner to ensure critical progress continues. On September 20, 2019, the Receiver issued a filing fee check to the Court of the Texas Western District for \$400.00. This check was issued to file the Receiver's Original Complaint against Relief Defendants. The Receiver issued checks to constable Ian Daley for a total of \$375.00. The checks were issued for service of summons in an attempt to serve

Ms. Jennifer Marie Weare, due to her various addresses. The Receiver issued a check to an hourly intern for a total of \$500.00 for various tasks relating to this Receivership such as maintaining the Receivership Facebook and website updates, assisting with documents, and emails.

Respectfully submitted,

GUY HOHMANN

By: /s/ Guy Hohmann

Guy Hohmann
State Bar No. 09813100
guyh@hohmannlaw.com
114 West 7th Street
Suite 1100
Austin, Texas 78701
Office: (512) 495-1438
Facsimile: (512) 499-0094

**RECEIVER FOR THE PROPHETMAX AND
IB CAPITAL RECEIVERSHIP ESTATES**

CERTIFICATE OF SERVICE

On January 31, 2020, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Guy Hohmann
Guy Hohmann

van OOSTEN
SCHULZ
de KORTE
attorneys at law

The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 1 August 2019

Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 1901882

Legal services over July 2019

Fees	€	22,104.00
Total amount	€	22,104.00

Payments should be made within 14 daysto Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01

van OOSTEN
SCHULZ
de KORTE
a d v o c a t e n

The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 16 August 2019

Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 1902060

Legal services up and including 20 August 2019

Fees	€	3,540.00
Total amount	€	3,540.00

Payments should be made within 14 daysto Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01

van OOSTEN
SCHULZ
de KORTE

attorneys at law

The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 2 September 2019

Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 1902183

Legal services over August 2019

Fees	€	6,282.00
Notarial and/or lawyer fees	€	294.00
Total amount	€	6,576.00

Payments should be made within 14 days to Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01

van OOSTEN
SCHULZ
de KORTE
attorneys at law

The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 2 October 2019

Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 1902381

Legal services over September 2019

Fees	€	10,047.00
Total amount	€	10,047.00

Payments should be made within 14 daysto Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01



The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 7 November 2019

Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 1902724

Legal services over October 2019

Fees	€	8,991.00
Bailiff's costs	€	356.00
Translation costs	€	3,644.00
Total amount	€	12,991.00

Payments should be made within 14 daysto Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01

van OOSTEN
SCHULZ
de KORTE
attorneys at law

The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 2 December 2019

Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 1903065

Legal services over November 2019

Fees	€	6,240.00
Bailiff's costs	€	100.00
Total amount	€	6,340.00

Payments should be made within 14 days to Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01

van OOSTEN
SCHULZ
de KORTE
attorneys at law

The Homann Law Firm
De heer G. Hohmann
114 W. 7th Street Suite 1100
TX 78704 Austin
Texas

Amsterdam, 8 January 2020

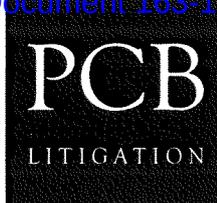
Matter : Hohmann / IB Capital, Geurkink, Echadi
Our reference : 20170590
Attorney : J.Ph. de Korte

Fee Note: 2000012

Legal services over December 2019

Fees	€	3,105.00
Translation costs	€	650.00
Total amount	€	3,755.00

Payments should be made within 14 daysto Van Oosten Schulz De Korte Advocaten B.V. at
IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01



SOLICITORS

4TH FLOOR, 90 CHANCERY LANE, LONDON WC2A 1EU
 TEL: +44 (0) 20 7831 2691 FAX: +44 (0) 20 7404 9435
 DX: 0038 LDE E-MAIL: enquiries@pcb litigation.com

The Hohmann Law Firm
 Norwood Tower
 114 West 7th Street
 Suite 1100
 Austin, Texas 78701
 United States of America

Date: 20 December 2019

Ref: TAM/AM/H130-1

Invoice No: 11160

Re: Guy M Hohmann as receiver of IB Capital (FX) LLP

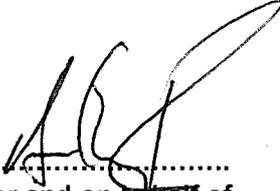
Details	Costs	Disbursements	VAT	VAT Rate
To Provision of Legal Services				
Costs as at 18/12/2019	£7,001.66		£0.00	0%
Court Fee		£639.00	£0.00	0%

Details for Direct Payment:

Account Name: PCB Litigation LLP
 Bank: National Westminster Bank
 Sort Code: 60-08-01 Account No: 66279038
 Swift Code/BIC: NWBK GB 2L
 IBAN: GB10 NWBK 6008 0166 2790 38

Total Costs	Total Disbursements	Total VAT
£7,001.66	£639.00	£0.00
		Total Charge
		£7,640.66
		£0.00
		£7,640.66

funds held on account
 balance due



 for and on behalf of
 PCB Litigation LLP

Your attention is drawn to notes overleaf relating to your rights

VAT Registration No. 893 8124 88

APPLEBYVAT Reg No:
TIN: 781206021e-mail:
MU-Billing@applebyglobal.com**Invoice**appleby ref:
446919.0001/JKinvoice date:
18 October 2019**Guy Hohmann**
The Hohmann Law Firm
Norwood Tower
114 West 7th Street
Suite 1100
Austin 78701
United States of America**Invoice Particulars**Invoice Number: 4113912
Invoice Period: 11 October 2019 to 18 October 2019
Matter: Service on IBC in Seychelles**Professional Services**For our professional services in effecting the service of summons issued by United States District Court, Western District of Texas, Austin Division on Neotex Advanced Ltd. and preparing an Affidavit of Service. **USD 3,000.00****Disbursements**Courier Charges 70.00
General Disbursement Charges 90.00
Search Fees - FSA Deposit - AISS 115.00**USD 3,275.00**

VAT Out of Scope at 0.00% 0.00

TOTAL - Amount Due USD 3,275.00

Please kindly note that payment is due immediately and must be settled within 14 days. Subject to local regulatory requirements or restrictions, we reserve the right to add interest at the rate of 10% per annum to any outstanding balance not settled within 14 days.

Seychelles Office
Appleby International
Services (Seychelles) Ltd
Suite 202
2nd Floor Eden Plaza
Eden Island
PO Box 1352
Mahe
Seychelles

Tel +248 4295 281
Fax +248 4225 281

applebyglobal.comBermuda
British Virgin Islands
Cayman Islands
Guernsey
Hong Kong
Isle of Man
Jersey
Mauritius
Seychelles
Shanghai

APPLEBYVAT Reg No:
TIN: 781206021e-mail:
MU-Billing@applebyglobal.com**Invoice**appleby ref:
446919.0001/JKinvoice date:
4 November 2019**Guy Hohmann**
The Hohmann Law Firm
Norwood Tower
114 West 7th Street
Suite 1100
Austin 78701
United States of America**Invoice Particulars**Invoice Number: 4115590
Invoice Period: 18 October 2019 to 4 November 2019
Matter: Service on IBC in Seychelles**Professional Services**For our professional services in effecting the service of summons issued by United States District Court, Western District of Texas, Austin Division on Riknik & Sons Ltd. and preparing an Affidavit of Service. **USD 3,000.00****Disbursements**Courier Charges 70.00
General Disbursement Charges 90.00
Notarial Fees 25.00
Search Fees - 115.00**USD 3,300.00**

VAT Out of Scope at 0.00% 0.00

TOTAL - Amount Due USD 3,300.00

Please kindly note that payment is due immediately and must be settled within 14 days. Subject to local regulatory requirements or restrictions, we reserve the right to add interest at the rate of 10% per annum to any outstanding balance not settled within 14 days.

Seychelles Office
Appleby International
Services (Seychelles) Ltd
Suite 202
2nd Floor Eden Plaza
Eden Island
PO Box 1352
Mahe
Seychelles

Tel +248 4295 281
Fax +248 4225 281

applebyglobal.comBermuda
British Virgin Islands
Cayman Islands
Guernsey
Hong Kong
Isle of Man
Jersey
Mauritius
Seychelles
Shanghai



Ross Tower
500 N. Akard Street, Suite 3800
Dallas, Texas 75201-6659
Main 214.855.7500
Fax 214.855.7584
munsch.com

Guy Hohmann, Receiver
The Hohmann Law Firm
Norwood Tower
114 West 7th Street
Suite 1100
Austin, TX 78701

Invoice Date: July 15, 2019
Invoice Number: 10402830
Matter Number: 018488.00001

For Professional Services through June 30, 2019

Client: Guy Hohmann, Receiver
Matter: I.B. Capital

Total Fees	\$ <u>11,863.00</u>
Grand Total Due	\$ 11,863.00

Wire Instructions:

Bank of Texas, N.A.
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 3800
Dallas, TX 75201-6659

File Number and Invoice Number Required.

Federal ID Number: 75-2096964

For billing inquiries, please contact ^{Exhibit A} accounting at accounting@munsch.com or (214) 740 5198



DALLAS / HOUSTON / AUSTIN

Ross Tower
500 N. Akard Street, Suite 3800
Dallas, Texas 75201-6659
Main 214.855.7500
Fax 214.855.7584
munsch.com

Guy Hohmann, Receiver
The Hohmann Law Firm
Norwood Tower
114 West 7th Street
Suite 1100
Austin, TX 78701

Invoice Date: October 8, 2019
Invoice Number: 10407933
Matter Number: 018488.00001

*For Professional Services through **September 30, 2019***

Client: Guy Hohmann, Receiver
Matter: I.B. Capital

Total Fees	\$	<u>770.00</u>
Grand Total Due	\$	770.00

Wire Instructions:

Bank of Texas, N.A.
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 3800
Dallas, TX 75201-6659

File Number and Invoice Number Required.

Federal ID Number: 75-2096964

For billing inquiries, please contact accounting at accounting@munsch.com or (214) 740 5198

Exhibit A

MUNSCH HARDT

DALLAS / HOUSTON / AUSTIN

Ross Tower
500 N. Akard Street, Suite 3800
Dallas, Texas 75201-6659
Main 214.855.7500
Fax 214.855.7584
munsch.com

Guy Hohmann, Receiver
The Hohmann Law Firm
Norwood Tower
114 West 7th Street
Suite 1100
Austin, TX 78701

Invoice Date: December 18, 2019
Invoice Number: 10413170
Matter Number: 018488.00001

For Professional Services through November 30, 2019

Client: Guy Hohmann, Receiver
Matter: I.B. Capital

Total Fees	\$ <u>550.00</u>
Grand Total Due	\$ 550.00

REMITTANCE

Wire Instructions:

Bank of Texas, N.A.
ABA Routing Number: 111014325
Account Number: 2880510762
Swift Code: BAOKUS44

Remittance Address:

Accounting
Munsch Hardt Kopf & Harr, P.C.
500 N. Akard St., Suite 3800
Dallas, TX 75201-6659

File Number and Invoice Number Required.

Federal ID Number: 75-2096964

For billing inquiries, please contact ^{Exhibit A} accounting at accounting@munsch.com or (214) 740 5198