



**The Trustee is requesting that each claim identified on Exhibit “A” be disallowed or conditionally allowed in the amount indicated for the reasons set forth in this Objection and in Exhibit “A”. Disputed Participant Claimants receiving this Objection should locate their name and claim number on Exhibit “A” and review the proposed treatment of their claims. If the Disputed Participant Claimant disputes the Trustee’s proposed treatment of his/her claim, such claimant must file a response with the Court, and serve a copy upon the Trustee within the time prescribed, all as set forth in the Notice attached hereto and as further described in paragraph 21 of this Objection.**

### **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”).
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 30, 2014, the Court allowed the motion by the Office of the United States Trustee to appoint a Chapter 11 trustee, and the Trustee was appointed on June 6, 2014.
5. 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 persons buying membership plans (“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.

6. 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 fee 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**

7. 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.

8. 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.

9. 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.

10. 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, 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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).

16. The Claims Procedure Order provided for the Trustee to send a *Notice of Proposed Resolution of Claim* ("First Notice") to those Participants whose claims did not comport with the TelexFree books and records. The First Notice identified deficiencies in the Participant's claim and proposed either claim disallowance or conditional allowance in a reduced amount. If a Participant did not respond to the First Notice within thirty (30) days, the Trustee filed a *Notice of Claim Allowance/Disallowance* ("Second Notice") with the Court and served it upon the Participant. The amount stated in the Second Notice would constitute the Participant's claim unless the Participant filed a response with the Court, and served a copy upon the Trustee,

within fourteen (14) days of receipt of the Second Notice, substantiating their claim and demonstrating good cause for failure to timely respond to the First Notice.

17. If a Participant timely responded to a Claim Notice and the Trustee was unable to consensually resolve the dispute, the Claims Procedure Order provided that the Trustee could file omnibus objections to Participant claims, in groups of no more than 250 Participants.

### **Objection to Claims**

18. By this Objection, the Trustee seeks entry of an order disallowing, or conditionally allowing in the amounts indicated on Exhibit "A", the Disputed Participant Claims. "Conditionally Allowed Claims" are those Participant claims which have been allowed for purposes of distribution by the Trustee unless the Trustee files a supplemental Notice of Claim Allowance or Disallowance on or before ten (10) days prior to a scheduled distribution to Participants.

19. Exhibit "A" includes, for each Disputed Participant Claim: (i) the claim number assigned to the Disputed Participant Claim; (ii) the name provided by the Disputed Participant Claimant; (iv) the amount of the Disputed Participant Claim; (iii) the basis for the objection to the Disputed Participant Claim, identified by the letters "A" through "G" (the "Objection Code"); and (v) the proposed treatment of the Disputed Participant Claim.

20. The Disputed Participant Claims should be allowed in a reduced amount, or disallowed, as set forth on Exhibit "A" based upon the objections to claim set forth below:

<b>Objection Code</b>	<b>Basis for Objection</b>
A	The Disputed Participant Claim includes one or more User Accounts that are subject to conflicting claims of ownership.
B	The Disputed Participant Claim does not provide an adequate explanation or documentation for the deletion of a User Account that is attributed to the claimant.
C	The Disputed Participant Claim does not provide an adequate explanation or documentation for the addition of a User Account that is not attributed to the claimant.
D	The Disputed Participant Claim does not provide an adequate explanation or documentation for the modification of a transaction in a User Account.
E	The Disputed Participant Claim does not provide an adequate explanation or documentation for the addition of a transaction in a User Account.
F	The Disputed Participant Claim asserts additional claim(s) that are not included in the determination of Participant's claims under the Net Equity formula.
G	The Disputed Participant Claim is duplicative of a later filed claim by the claimant.

#### **Notice**

21. The Trustee has filed herewith a Motion to Approve Form of Notice and a proposed Notice of (I) Omnibus Objection by Chapter 11 Trustee to Claims, (II) Deadline to Submit Response, and (III) Scheduling of Non-Evidentiary Hearing ("Notice"). As set forth in

the Motion to Approve Form of Notice, the Notice provides information to Disputed Participant Claimants respecting the deadline to respond to this Objection, 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@TelexFreeClaims.com**.

22. The Trustee requests that the form of the Notice be approved on an expedited basis and that it govern the rights and obligations of the Disputed Participant Claimants.

23. In accordance with the Claims Procedure Order, the Trustee intends to have this Objection and the Notice translated into Spanish and Portuguese and served upon all Disputed Participant Claimants.

24. Nothing in this objection constitutes a waiver of any right of the Trustee to assert claims or causes of action against any Participant or any other party. Nothing in this objection shall constitute a waiver of any right of the Trustee to object to any other claim asserted that is not included in the Objection, or to supplement, amend, or assert additional bases for objection to the Exhibit "A" claims.

Wherefore, the Trustee prays that the Court:

1. Enter an order disallowing each of the Disputed Participant Claims identified on Exhibit "A" hereto or conditionally allowing such claims in the amounts indicated on Exhibit "A"; 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: August 29, 2019  
763320

**EXHIBIT A**

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Objection Code <sup>3</sup>	Amount of Claim as Filed	Proposed Allowed Amount	Docket Number of Response	Notes
66246-000	Sergey Vasilevich Poseukov	Russia	E	\$ 7,371.80	\$ 2,947.10	N/A	
74119-000	Anna Dovmalyan	Russia	G	8,300.50	Disallowed	N/A	
107911-000	Karen Gukasyan	Russia	G	749.60	Disallowed	N/A	
74434-000	Aloys Mpagazehe	Rwanda	G	12,082.20	Disallowed	N/A	
74464-000	Aloys Mpagazehe	Rwanda	G	41,468.80	Disallowed	N/A	
121056-000	Charles Sebintu	Rwanda	C	12,000.00	1,225.40	N/A	2
121600-000	Olivier Nsengimana	Rwanda	G	2,949.80	Disallowed	N/A	
122435-000	Jean De Dieu Shyaka	Rwanda	G	1,495.00	Disallowed	N/A	
78078-000	Ilze De Jager	South Africa	C	15,000.00	Disallowed	N/A	
119601-000	Chun Ying Wang	South Africa	C	5,700.00	187.20	N/A	2
04617-000	Antonio Sanchez Borrego Sanchez Borrego	Spain	G	12,700.00	Disallowed	N/A	
05828-000	Antonio Bejar Martinez	Spain	G	4,275.00	Disallowed	N/A	
08660-000	Antonio Sanchez Borrego	Spain	G	12,700.00	Disallowed	N/A	
08683-000	Antonio Sanchez Borrego	Spain	G	12,700.00	Disallowed	N/A	
08756-000	Antonio Sanchez Borrego	Spain	G	18,932.50	Disallowed	N/A	
09895-001	Antonio Sanchez Borrego	Spain	G	18,932.50	Disallowed	N/A	
17401-000	Maria Del Carmen Pena Rey	Spain	G	4,075.20	Disallowed	N/A	
29355-000	Sidnei Pezzetti	Spain	G	4,225.10	Disallowed	N/A	
36507-000	Luis Javier Casaus Melero	Spain	G	4,324.90	Disallowed	1256	
44923-000	Beatriz Isturiz Sanz	Spain	C	3,000.00	Disallowed	1250	
46253-000	Natalia Artemieva Kostyunina	Spain	AE	36,402,751.00	1,474.90	N/A	
53670-000	Fco Javier Garcia Gaitan	Spain	C	3,000.00	1,125.00	N/A	2
58001-000	Judith Palacios	Spain	G	838.60	Disallowed	1270	
59704-000	Milton Cesar Estela Mejia	Spain	G	1,677.20	Disallowed	1264	
61255-000	Judith Palacios	Spain	A	845.60	Disallowed	1271	
63509-000	Luis Marcelo Onofre De Valenzuela Sanchez	Spain	C	10,300.00	359.50	N/A	2
65757-000	Jesus Maria Oses Larraneta	Spain	A	6,925.40	Disallowed	N/A	
68148-000	Maria Jesus Holgado Garcia	Spain	F	13,000.06	1,474.90	1288	
72621-000	Maria Jose Prudencio Reguilon	Spain	G	4,754.70	Disallowed	1266	
76598-000	Alvaro Jose Noya Grela	Spain	G	18,419.50	Disallowed	N/A	
79799-000	Jose Rodriguez Hidalgo	Spain	G	15,724.90	Disallowed	N/A	
89772-000	Jose Luis Garcia Consuegra Martin	Spain	G	4,324.90	Disallowed	N/A	
108787-000	Zunilda Santos Garcia	Spain	C	5,980.00	Disallowed	N/A	
116935-000	Gerardo Raul Screpante	Spain	F	10,000.00	1,425.00	1309	2
116944-000	Nancy Edith Fassina Pascual	Spain	F	9,275.00	Disallowed	1304	
117197-000	Gerardo Raul Screpante	Spain	G	36,519.80	Disallowed	1308	
119492-000	Sonia Caro Gomez	Spain	G	1,074.10	Disallowed	N/A	
89208-000	Hu Yueh Chieh Su	Taiwan	A	5,700.00	Disallowed	N/A	
122436-000	Yueh Chieh Hu	Taiwan	A	1,425.00	Disallowed	N/A	
130221-000	Yin-Tzu Su	Taiwan	A	24,424.60	Disallowed	N/A	
131117-000	Pin-Hsun Lee	Taiwan	A	5,700.00	Disallowed	N/A	
55469-000	Margaret Kahwa Salmo	Uganda	C	4,624.50	Disallowed	N/A	
04960-000	Renson Ayende Salazar Vargas	United Kingdom	G	1,425.00	Disallowed	N/A	
63439-000	Mihal Tigleau	United Kingdom	G	1,125.00	Disallowed	N/A	
70273-000	Joel Da Costa	United Kingdom	G	4,193.00	Disallowed	1282	
75241-000	Colin Donnison	United Kingdom	BD	1,474.90	Disallowed	N/A	
00470-000	Simone De Oliveira	United States	F	14,000.00	Disallowed	N/A	
00564-000	Manuel A Deleon	United States	A	8,247.50	Disallowed	N/A	
01146-000	Aloisio Freitas Barbosa	United States	G	10,274.40	Disallowed	N/A	
01186-000	Wadeea Owens	United States	C	17,321.00	Disallowed	N/A	
01201-001	Kosal Leng	United States	C	4,275.00	3,376.80	N/A	2
01298-001	Ernane G Dias	United States	C	6,575.20	Disallowed	N/A	
01680-000	Roman Kalyuzhny	United States	G	5,570.46	Disallowed	1162	
02663-000	Adele Maria Baumgart	United States	G	4,149.90	Disallowed	N/A	
03235-000	Croft Investmens Limited Partnership	United States	A	12,425.80	Disallowed	N/A	
03302-000	Roberson Pierre Louis	United States	C	33,000.00	Disallowed	N/A	
03719-000	Sandro Henrique	United States	C	4,374.90	4,374.80	N/A	2
05598-000	Yadira Amador	United States	G	1,425.00	Disallowed	N/A	
05605-000	Yadira Amador	United States	G	1,425.00	Disallowed	N/A	
05874-000	Ricardo Ivan Feliz Sosa	United States	F	9,500.00	Disallowed	N/A	
06890-001	Luis Manuel Mota Vasquez	United States	G	2,850.00	Disallowed	N/A	
07377-000	Maria Tembo	United States	A	21,494.90	Disallowed	1155	
07380-000	Michael Tembo	United States	A	21,494.90	Disallowed	1155	
07863-001	Edward Kent Loughery	United States	C	8,668.65	Disallowed	N/A	
09268-000	Cheang Bora	United States	C	7,504.66	Disallowed	N/A	
09404-000	Mapp Channy	United States	A	2,899.90	49.90	N/A	
09997-000	Armand Merlin Tsafack	United States	G	1,425.00	Disallowed	N/A	
10912-000	Igor Shikhman	United States	C	57,000.00	23,250.20	N/A	2
11622-000	Phin Sophearom	United States	C	3,189.00	Disallowed	N/A	
15723-000	Alessandra Leite Berniz	United States	C	5,900.00	Disallowed	N/A	
16840-000	Tabitha Vang	United States	C	5,000.00	Disallowed	N/A	
17949-000	Bernadette Alcindor	United States	C	3,400.00	Disallowed	N/A	
18086-000	Tit Sophal	United States	C	13,368.00	4,983.10	N/A	2
18205-000	Kim Sokunmealea	United States	C	15,229.00	2,295.40	N/A	2
18838-000	Nelson Homma	United States	D	30,457.50	1,618.50	1192	
24319-000	Thong Noproit	United States	C	9,708.00	Disallowed	N/A	
24340-000	Thong Sovann	United States	C	14,650.30	Disallowed	N/A	
25944-000	Carlos Jose Luna Gautreaux	United States	G	26,730.90	Disallowed	N/A	
26304-000	Mark Jeffrey Vera	United States	C	19,907.02	10,124.70	N/A	2
27518-000	Marcial Amador	United States	G	15,000.00	Disallowed	N/A	
29503-000	Walter V Ortiz Toledo	United States	B	4,324.90	1,474.90	N/A	2
29672-000	Vilma Cardozo Freire	United States	A	3,239.50	Disallowed	N/A	

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Objection Code <sup>3</sup>	Amount of Claim as Filed	Proposed Allowed Amount	Docket Number of Response	Notes
29680-000	Anir De Oliveira Cardozo	United States	A	8,599.90	5,360.40	N/A	
31471-000	Svitlana Kakhnikeyevch	United States	G	1,500.00	Disallowed	N/A	
32033-000	Nina Francesca Castillo	United States	G	15,525.30	Disallowed	N/A	
33450-000	Tiodora De Pena	United States	C	14,200.00	2,407.90	N/A	2
33884-002	Luiz Roberto Caldas Christo	United States	D	93,926.20	Disallowed	1259	
34072-000	Rosa Pena	United States	C	5,400.00	5,353.40	N/A	2
35151-000	Maria Januario	United States	C	18,836.10	500.50	1221	2
35542-000	Emanuel Joseph Edwards	United States	G	2,850.00	Disallowed	N/A	
38737-000	Ra Thi Nien	United States	G	1,425.00	Disallowed	N/A	
40900-000	George David Thomas	United States	A	23,288.70	Disallowed	N/A	
41941-001	Edward J Dilorenzo	United States	F	69,700.40	32,431.40	1242	
41972-000	Maria Avila	United States	C	4,275.00	187.88	N/A	2
42403-000	Ith Puthy	United States	C	3,339.50	1,548.30	N/A	2
42506-000	Panagiotis Iatrou	United States	C	20,000.00	Disallowed	N/A	
42528-000	Carolina Jimenez	United States	C	9,475.02	4,171.60	N/A	2
42543-000	Manal Hamadi	United States	C	15,675.00	Disallowed	N/A	
42547-000	Ali Hamadi	United States	C	68,400.00	Disallowed	N/A	
42581-000	Hubert Lubin	United States	DE	14,575.00	Disallowed	1245	
43576-000	James Wayne Washington	United States	C	75,100.00	7,119.90	1148	
44157-000	Carlos M Pena	United States	F	5,200.00	Disallowed	N/A	
45274-000	Edward Celani	United States	G	10,000.00	Disallowed	N/A	
45339-000	Marcus Terrell Gooden	United States	AF	11,425.00	Disallowed	1197	
46060-000	Alpha H Fleurimond	United States	C	5,000.00	2,064.00	N/A	2
46549-000	Roman Kalyuzhny	United States	D	5,570.46	1,295.46	1162	
46717-000	Francisco Barros	United States	G	10,024.90	1,474.90	N/A	2
46768-000	Christina Vue	United States	G	2,465.90	Disallowed	N/A	
47363-000	Thomas Gordon	United States	C	8,800.00	Disallowed	N/A	
48583-000	Pen Kongsambath	United States	C	3,189.00	2,918.90	N/A	2
48795-000	Gwenette Newbold	United States	C	3,000.00	2,850.00	N/A	2
49530-000	Prak Punlok	United States	C	4,187.80	1,095.10	N/A	2
50008-000	Andrea P Janvier	United States	D	9,637.20	Disallowed	1195	
50799-000	Wanlan Zheng	United States	G	5,704.30	Disallowed	N/A	
50821-000	Yadira Amador	United States	G	4,324.90	Disallowed	N/A	
52018-000	Variety Office Service	United States	G	3,500.00	2,064.00	N/A	2
52210-000	Unica Cleaning Services Inc	United States	F	5,000.00	Disallowed	N/A	
52309-000	Roberto Espindola Anguiano	United States	G	4,374.80	Disallowed	N/A	
53058-000	Siria Durham	United States	C	50,648.75	1,050.40	N/A	2
53913-000	Mohamed B Bendahgane	United States	C	15,675.00	5.70	N/A	2
54122-000	Sean Doniro	United States	G	4,374.80	Disallowed	N/A	
55055-000	Carolina Ingente Caparros	United States	G	550.00	Disallowed	N/A	
56727-000	Chhorn Pheary	United States	C	8,550.00	4,025.50	N/A	2
56820-000	Sok Ratana	United States	C	4,614.00	998.00	N/A	2
56873-000	Chou Chhuneng	United States	C	4,765.00	4,283.10	N/A	2
57228-000	Isabel Mercedes Torres	United States	C	15,675.00	Disallowed	N/A	
58118-000	Ven Chanra	United States	C	4,764.50	Disallowed	N/A	
58245-000	Jeffrey John Gusha	United States	C	18,531.00	Disallowed	N/A	
58672-000	Chanthan Lisha	United States	C	4,681.60	1,628.70	N/A	2
58691-000	Sam Bok	United States	C	4,769.00	1,125.60	N/A	2
61403-000	Ingrid Ghilarducci	United States	C	6,400.00	5,650.10	N/A	2
62027-000	Bou Vichikasattiyakol	United States	C	4,944.80	2,201.30	N/A	2
62077-000	Bou Sathiatevykollan	United States	C	8,993.60	4,428.80	N/A	2
62104-000	Sen Samondara	United States	C	11,540.80	4,114.10	N/A	2
62360-000	Maria Higuinia Rodriguez	United States	G	3,286.70	Disallowed	N/A	
62920-000	Chan Sithyamadina	United States	C	6,698.00	4,390.00	N/A	2
63003-000	Bou Sathyaphanary	United States	C	16,416.80	8,716.30	N/A	2
63152-000	San Narith	United States	C	3,850.00	1,474.90	N/A	2
63319-000	Jorben Luis Espinal Cabrera	United States	C	7,500.00	1,425.00	N/A	2
63592-000	Christine Lalng	United States	C	1,879.60	Disallowed	N/A	
63949-000	Jessica Madrid Loza	United States	B	33,174.20	1,275.30	1253	2
64221-000	Alberto Sanchez Navarro	United States	G	27,314.20	Disallowed	1254	
64989-000	Chuong Sovann	United States	C	4,764.50	Disallowed	N/A	
65018-000	Pen Chhorvy	United States	C	5,443.80	985.60	N/A	2
65101-000	Tan Phannara	United States	C	10,716.80	3,886.70	N/A	2
65760-000	Yen Sreyroth	United States	C	11,978.70	Disallowed	N/A	
66709-000	Chhor Daka	United States	C	33,413.40	7,469.10	N/A	2
66754-000	Nop Chheng	United States	C	3,339.50	2,635.00	N/A	2
66806-000	Un Boramy	United States	C	11,354.30	Disallowed	N/A	
66838-000	Ben Ratana	United States	C	4,018.80	2,166.50	N/A	2
66857-000	Mok Phoern	United States	C	4,275.00	3,177.20	N/A	2
66949-000	Rhonda Vanessa Zimmerman	United States	CF	5,826.40	1,474.90	1163	
66987-000	Phay Phary	United States	C	10,100.90	3,597.00	N/A	2
67007-000	Ang Chamroeun	United States	C	7,125.00	Disallowed	N/A	
67559-000	Rachid Saleh	United States	C	27,550.00	300.70	N/A	2
67712-000	Xiao Ping	United States	F	50,000.00	Disallowed	N/A	
67926-000	Xi Xing	United States	F	50,000.00	Disallowed	N/A	
67938-000	Jennifer Yan	United States	F	50,000.00	Disallowed	N/A	
68297-000	Chuck Vee Hom	United States	AF	10,611.05	Disallowed	N/A	
68351-000	Heng Sopheap	United States	C	20,995.10	6,940.50	N/A	2
70009-000	Suorn Sony	United States	C	5,612.60	Disallowed	N/A	
70715-000	Than Kunvichet	United States	C	15,382.40	2,628.20	N/A	2
72402-000	William Hernán Builes	United States	C	31,200.00	Disallowed	N/A	
73726-000	Leonardo Soares Rodrigues	United States	CF	12,003.50	Disallowed	N/A	

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Objection Code <sup>3</sup>	Amount of Claim as Filed	Proposed Allowed Amount	Docket Number of Response	Notes
74722-000	Christopher P McCormick	United States	A	64,300.50	Disallowed	N/A	
75562-000	Chunting Kong	United States	C	25,000.00	Disallowed	N/A	
76143-000	Nelson Almada	United States	C	22,850.00	17,140.20	1143	2
76285-000	Vanderlan Urils De Oliveira	United States	C	8,955.97	4,424.70	N/A	2
76811-000	Carlos Dealvarenga	United States	C	25,000.00	Disallowed	N/A	
76996-000	Maria Hernandez	United States	C	3,100.00	1,375.10	N/A	2
77212-000	Andre De Araujo	United States	G	98,498.00	Disallowed	N/A	
78464-000	Ruth Kosta Dhionis	United States	D	7,065.09	Disallowed	1132	
79042-000	Wiston Auguste	United States	D	20,351.90	Disallowed	N/A	
80847-000	Pheng Xlong	United States	C	17,325.00	11,350.10	N/A	2
82873-000	Alex E Guzman	United States	C	28,405.00	Disallowed	1215	
87556-000	Raymond Bilodeau	United States	E	22,907.00	12,952.60	1156	2
87642-000	Angel Medina	United States	C	10,430.00	7,174.90	1139	2
87673-000	Samuel Perez	United States	CF	3,000.00	Disallowed	1146	
88692-001	Alejandro Sanchez	United States	D	18,000.36	Disallowed	N/A	
90698-000	Hem Hymakearith	United States	C	3,429.00	1,325.20	N/A	2
90958-000	Such Prum	United States	A	2,631.00	Disallowed	N/A	
91201-000	Ly Keang	United States	C	3,339.50	1,857.40	N/A	2
91616-000	Ung Kimheang	United States	A	1,425.00	Disallowed	N/A	
91722-000	Thon Sophon	United States	C	4,187.80	2,822.20	N/A	2
91851-000	Sikhet Tea	United States	C	4,275.00	3,576.40	N/A	2
92756-000	Yiqun Jin	United States	G	4,158.80	Disallowed	N/A	
92969-000	Nancy Long	United States	G	19,273.50	Disallowed	N/A	
94592-000	Vathanak Pich	United States	C	8,113.00	776.30	N/A	2
94654-000	Aloisio Freitas Barbosa	United States	D	9,975.00	6,075.30	N/A	
98374-000	Maria Sofia De Oliveira	United States	C	4,275.00	Disallowed	N/A	
98444-000	Sheila Patricia Silva Simoes Ferraz-Luz	United States	C	15,675.00	Disallowed	N/A	
98453-000	Ricardo Jose Polanco	United States	G	1,375.10	Disallowed	N/A	
100215-000	Leticia Melz Nascimento	United States	C	9,975.00	6,650.98	N/A	2
100245-000	Idalina Marques Valente	United States	C	7,125.00	4,564.10	N/A	2
102000-000	Debra Sue Sabin	United States	G	7,124.70	Disallowed	N/A	
103604-000	Paul Joseph Lozier	United States	F	7,500.00	Disallowed	N/A	
104556-000	Nadya Amabilia Morales	United States	F	1,960.20	Disallowed	N/A	
104788-000	Anderson Luiz Marotti	United States	C	8,550.00	5,700.00	N/A	2
104880-000	Maria Elisa Di Batista	United States	C	4,664.00	1,425.00	N/A	2
104939-000	Thiago Amantino	United States	C	5,700.00	1,375.10	N/A	2
105222-000	Paulo Roberto Pereira	United States	C	9,975.00	Disallowed	N/A	
105397-000	Erick Carvalho Santos	United States	C	11,400.00	Disallowed	N/A	
105662-000	Paulo De Souza Madeira	United States	C	12,825.00	1,853.50	N/A	2
106492-000	Solange Rodrigues De Oliveira	United States	C	32,775.00	826.20	N/A	2
107225-000	Ry Sydaneth	United States	C	4,182.00	3,444.50	N/A	2
107533-000	Cristiana Seabra	United States	D	29,748.90	5,523.90	1236	
108440-000	Lun Chanvannak	United States	C	4,765.00	546.20	N/A	2
108541-000	Samir Leangmey	United States	C	5,433.00	147.00	N/A	2
108631-000	Kim Kotara	United States	C	10,686.40	Disallowed	N/A	
108893-000	Khov Reaksmeay	United States	C	5,432.40	3,534.60	N/A	2
109062-000	Fakir Abdellah	United States	C	57,604.00	Disallowed	N/A	
109227-000	Slv Vengthy	United States	C	3,339.50	1,368.10	N/A	2
109325-000	Khan Kumpheak	United States	C	4,096.60	2,184.00	N/A	2
109351-000	San Sokru	United States	C	5,700.00	4,363.00	N/A	2
109431-000	Sun Sara	United States	C	10,486.60	Disallowed	N/A	
109580-000	Ching Chham Mony	United States	C	4,764.50	2,334.30	N/A	2
109674-000	Pov Molika	United States	C	7,125.00	5,201.00	N/A	2
109715-000	Ly Cheng	United States	C	5,343.20	5,200.70	N/A	2
109892-000	Paulo Roberto Rosa	United States	G	1,425.00	Disallowed	N/A	
109930-000	Sor Sophearum	United States	C	7,525.30	676.50	N/A	2
110012-000	Kim Chhunchhayaraneth	United States	C	7,614.50	Disallowed	N/A	
111157-000	Christine Laing	United States	G	5,239.50	Disallowed	N/A	
113421-000	Olufunso Ayodele Orioke	United States	C	17,149.90	11,549.70	N/A	2
114911-000	Carmina Veytia	United States	C	19,528.90	15,303.80	N/A	2
115036-000	Wellington Leonidas Gonzalez	United States	D	2,424.99	Disallowed	N/A	
116984-000	Lianne Wambui Wachira	United States	C	7,500.00	1,275.30	N/A	2
118399-000	Everson Lopes Francisco	United States	C	66,975.00	Disallowed	N/A	
118571-000	Jennifer Lien	United States	C	15,000.00	548.90	N/A	2
118926-000	Ngov Sophanith	United States	C	11,631.80	Disallowed	N/A	
119582-000	Junlordit	United States	C	4,500.00	Disallowed	N/A	
120089-000	Sergio Ribas Lemes Junior	United States	D	18,137.00	Disallowed	N/A	
120177-000	Oeng Kanika	United States	C	23,440.20	5,667.90	N/A	2
120185-000	Nilsa Rocha Silva	United States	C	4,275.00	Disallowed	N/A	
121715-000	Peter Said Rahhaoui	United States	C	4,500.00	Disallowed	N/A	
121725-000	Crucito Rosa	United States	F	9,975.00	8,550.00	1145	2
121727-000	Diolen Monteiro	United States	F	11,400.00	10,024.90	1141	2
121741-000	Vinicius Teixeira	United States	C	12,825.00	3,546.60	N/A	2
122044-000	Ilya Prudovsky	United States	F	109,775.00	199.60	1142	2
122047-000	Dalia Cedeno-Gamba	United States	F	6,394.40	Disallowed	1140	
122059-000	Franklin Mejia	United States	F	15,675.00	2,850.00	1158	
122151-000	Karukina Anastasia	United States	F	20,050.00	19,624.70	1138	2
122256-000	Marcio Costa	United States	C	17,220.00	Disallowed	N/A	
122731-000	Salf Muhsen	United States	C	48,000.00	Disallowed	N/A	
124545-000	Rosangela Estefani	United States	F	8,599.90	Disallowed	1214	
125253-000	Myrtle Elouise Lewis	United States	DE	12,200.00	2,073.00	N/A	2
125498-000	Norine Dora Tan	United States	C	6,400.00	Disallowed	N/A	

In re: TelexFree, LLC et al.

Exhibit A to Second Omnibus Objection to Claims

Claim Number	Claimant Name	Country of Residence <sup>1</sup>	Objection Code <sup>3</sup>	Amount of Claim as Filed	Proposed Allowed Amount	Docket Number of Response	Notes
125565-000	Croft Investments Limited Partnership	United States	A	12,425.80	Disallowed	N/A	
125934-000	Christopher Paul McCormick	United States	G	100,000.00	Disallowed	N/A	
126169-000	Edward Celant	United States	C	10,000.00	7,195.00	N/A	2
126271-000	Aloisio Freltas Barbosa	United States	G	6,374.70	Disallowed	N/A	

**Notes**

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

2: Upon review of the information provided by the claimant in conjunction with TelexFree's records, the claim amount has been increased from the original conditionally allowed amount of the claim.

3: Objection Codes are defined as follows:

Objection Code	Description
A	The Disputed Participant Claim Includes one or more User Accounts that are subject to conflicting claims of ownership.
B	The Disputed Participant Claim does not provide an adequate explanation or documentation for the deletion of a User Account that is attributed to the claimant.
C	The Disputed Participant Claim does not provide an adequate explanation or documentation for the addition of a User Account that is not attributed to the claimant.
D	The Disputed Participant Claim does not provide an adequate explanation or documentation for the modification of a transaction in a User Account.
E	The Disputed Participant Claim does not provide an adequate explanation or documentation for the addition of a transaction in a User Account.
F	The Disputed Participant Claim asserts additional claim(s) that are not included in the determination of Participant's claims under the Net Equity formula.
G	The Disputed Participant Claim is duplicative of a later filed claim by the claimant.

4: 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.