

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

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

Reorganized Debtors.

**Chapter 11
Case No. 14-40987-EDK
Case No. 14-40988-EDK
Case No. 14-40989-EDK**

Substantively Consolidated

**UNCONTESTED MOTION BY CHRISTOPHER LOAIZA SALAZAR FOR
AUTHORITY TO COMPEL
THE PRODUCTION OF DOCUMENTS PURSUANT TO FED. R. BANKR. P. 2004**

To the Honorable Elizabeth D. Katz, United States Bankruptcy Judge:

NOW COMES Christopher Loaiza Salazar (“Movant”), through his undersigned counsel, and hereby respectfully requests (the “Motion”) entry of an Order, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (“Rule 2004”), authorizing the Movant to compel the production of documents from, Stephen B. Darr, the liquidating trustee (the “Liquidating Trustee”) of Telexfree, LLC, TelexFree, Inc., LLC, and TelexFree Financial, Inc. (collectively, the “Reorganized Debtors” or “TelexFree”).¹ The substance of the document requests are narrowly tailored to obtain critical information necessary for Movant to pursue an appeal in a criminal matter in the Country of Peru where he and others were convicted of “criminal fraud” related to Movant’s business dealings with TelexFree. As discussed below, Movant seeks to obtain documents and information needed to correct the record currently available to the criminal court in Peru as part of the appeal of his conviction. **The Liquidating Trustee has not opposed the relief requested in this Motion.**

¹ Movant expects that the production of documents by the Liquidating Trustee will obviate the need to conduct an examination. Movant, however, reserves the right to request authority to conduct an examination, if necessary, to ensure a full understanding of the process utilized by the Liquidating Trustee to identify and deliver the documents sought by Movant.



In support of this Motion, Movant states as follows:

RELEVANT FACTUAL BACKGROUND

A. Bankruptcy Case Background.

1. On April 13, 2014 (the “Petition Date”), the Reorganized Debtors filed voluntary petitions commencing these cases (the “Chapter 11 Cases”) under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Nevada.

2. On or about April 15, 2014, the Securities and Exchange Commission (“SEC”) commenced an action against the Debtors and others in the United States District Court for the District of Massachusetts, alleging among other things that the Debtors were engaged in an illegal pyramid scheme and were raising funds through the fraudulent and unregistered offering of securities.

3. On or about April 22, 2014, the Office of the United States Trustee filed a motion for the appointment of a Chapter 11 trustee. On April 23, 2014, the SEC filed a motion to transfer venue of the cases to the United States Bankruptcy Court for the District of Massachusetts.

4. By order dated May 6, 2014, the motion to change venue was approved. The cases were transferred on May 9, 2014. On May 30, 2014, this Court approved the motion to appoint a Chapter 11 trustee, and Stephen Darr was appointed as such.

5. On July 8, 2020, the Court held a hearing on the First Amended Liquidating Plan of Reorganization (the “Plan”) of Stephen Darr, the Chapter 11 Trustee.

6. On July 9, 2020, the Court entered an order confirming the Plan (the “Plan Order”) [Dkt No. 3432].

7. The Plan became effective on July 14, 2020 (the “Effective Date”). Upon the Effective Date, Mr. Darr was appointed as Liquidating Trustee to implement the terms of the confirmed Plan.

B. The Movant and the Peruvian Criminal Matter.

8. Prior to the Petition Date, the Movant and certain of his relatives were promoters of TelexFree’s services. As promoters, they were required to (i) post five advertisements every day on the TelexFree website, for which they earned \$100 per week, (ii) recruit new promoters, for which they earned \$100 for each new member, and 1% for each new member recruited, after the first recruit, up to the sixth “generation”.

9. Among others, the Movant introduced the following individuals to TelexFree, each of whom, upon information and belief, became promoters:

- a. MARCIA CECILIA CARDENAS ALVAREZ (“Marcia”)
- b. MARIA ELENA CALLAPIÑA CONDORI (“Maria”)
- c. JOSE ANTONIO CALLAPIÑA CONDORI (Jose”)
- d. TANIA ROCIO DELGADO MONGE (“Tania”).

10. Despite their willing involvement in the TelexFree and their registration with TelexFree to serve as promoters, after the collapse of TelexFree, Marcia, Maria, Jose and Tania pursued a criminal fraud action against the Movant and certain of his relatives in Peru (“Peru Criminal Action”) alleging that they were deceived by the Movant and his relatives. Trials began in the Peru Criminal Action in 2014. In 2016 the prosecutor in charge of the Peru Criminal Action requested records from the U.S. Department of Justice. On February 2, 2020, the Criminal Court in Peru found the Movant and his relatives guilty of aggravated fraud. The Movant and his relatives have appealed the result and appeal efforts, thus far, have been

unsuccessful. Through this Rule 2004 Motion, the Movant and his relatives intend to collect and present new evidence for review by the Criminal Court in Peru.

11. In connection with the Peru Criminal Action, Marcia, Maria, Jose and Tania alleged that the Movant and his family members had committed criminal fraud against them by retaining funds that Marcia, Maria, Jose and Tania had delivered for the purpose of investment into TelexFree, but that Movant had failed to “register” them with TelexFree and had instead kept for themselves the funds intended for registration.

12. As part of the criminal diligence process, and using international cooperative channels, Peruvian officials made inquires to the United States Department of Justice regarding various matters related to TelexFree. Among other things, Peruvian officials requested information regarding “recruiters and participants” involved in TelexFree. In a response to the Peruvian officials dated April 6, 2017 (the “April 6th DOJ Letter”, See **Exhibit A**), the U.S. Department of Justice provided an update regarding the TelexFree investigation, responded to certain specific requests for information, and delivered information in the form of Excel spreadsheets about “recruiters and participants” collected from TelexFree’s electronic records.²

13. As a result of the April 6th DOJ Letter and the information included in the Excel spreadsheets, Tania no longer qualified as a complaining party in the criminal matter. More specifically, Tania’s name was accurately listed in the records provided along with the April 6th DOJ Letter and, as a result, she was no longer able to pursue criminal allegations against the

² See, Exhibit A, page 2, item numbered 5 which states “[w]ith regard to the TelexFree recruiters and participants mentioned in the request, we have collected information about them from TelexFree’s electronic business data, enclosed in a series of Excel spreadsheets”; see, Exhibit A, page 3, reference to enclosure 2 which describes “[s]preadsheets containing TelexFree’s business records and information obtained by U.S. Homeland Security Investigations (HSI) on the TelexFree recruiters and targets.”

Movant and his family members. Tania’s appropriate remedy was to file a proof of claim form and receive whatever recovery to which she was entitled under the confirmed Plan.

14. Movant was quite surprised that Marcia, Maria, and Jose were not also eliminated from the Peruvian criminal action for the same reason as Tania. Specifically, they should have been identified as registered participants and the funds delivered on their behalf should have been recorded in the TelexFree records and, as such, their appropriate remedy should have been to file a proof of claim form, as it was for Tania.

15. In reviewing the information provided with the April 6th DOJ Letter, the Movant believes that full proper names of Marcia, Maria, and Jose were likely keyed into the spreadsheets provided with the April 6th DOJ Letter with misspellings common when translating the Spanish language to English language. More specifically, the Movant believes that the names of Marcia, Maria, and Jose appeared in the TelexFree records at the time of the April 6th DOJ Letter in some manner or variation as the following WRONG NAMES:

CORRECT NAMES	WRONG NAMES
MARCIA CECILIA CARDENAS ALVAREZ	Maria Cecilia CARDENAS ALVAREZ
MARIA ELENA CALLAPIÑA CONDORI	Maria Elena CALLAPIRA CONDORI
JOSE ANTONIO CALLAPIÑA CONDORI	Jose Antonio Callapira Condori
TANIA ROCIO DELGADO MONGE	---

16. In the materials provided with the April 6th DOJ Letter, it appears that Marcia was misidentified as “Maria”. Also in the materials provided with the April 6th DOJ Letter, it appears that Maria’s third name was spelled “Callapira” rather than correctly spelled as “Callapiña”, apparently omitting the Spanish letter “ñ” and using the English letter “r” instead. Similarly, in the materials provided with the April 6th DOJ Letter, Jose’s third name was spelled “Callapira”, as well, rather than correctly spelled as “Callapiña”.

17. Prior to filing this Motion, as part of the Movant's attempts to locate additional information regarding the Marcia, Maria and Jose, Movant obtained a Clerk's Certificate from the Clerk of the Massachusetts Bankruptcy Court which indicates that the Liquidating Trustee (then the Chapter 11 Trustee), filed "Schedule F – Creditors Holding Unsecured Nonpriority Claims (Part-2)" which correctly identifies Marcia, Maria, Jose, and Tania – all properly spelled (See **Exhibit B**).

18. As a result of the inclusion of Marcia, Maria, Jose, and Tania, properly spelled, on the Schedule F prepared by the Chapter 11 Trustee, the Movant believes that additional information must exist in TelexFree's books and records that will establish that they were registered with TelexFree, that the funds at issue were delivered to TelexFree (and not diverted by Movant), and that each had an opportunity to file a proof of claim for as the remedy for their losses.

19. In sum, the Movant seeks through this process to obtain sufficient information to identify Marcia, Maria and Jose as registered promoters, or Participants, in TelexFree. To do so will allow the Movant to prosecute the appeal of his conviction in Peru, a conviction for which his is now facing significant time in prison.

20. The Proposed Examinee is the Liquidating Trustee, or a representative of the Liquidating Trustee with sufficient knowledge of the information and materials sought.

21. The documents that Movant seeks to compel are described in **Exhibit C** attached hereto.

BASIS FOR RELIEF REQUESTED

22. Rule 2004(a) provides that "[o]n motion of any party in interest, the court may order the examination of any entity." Fed. R. Bankr. P. 2004(a). Rule 2004(b) provides that

“[t]he examination of an entity under this rule . . . may relate only to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor’s estate” Fed. R. Bankr. P. 2004(b). Further, pursuant to Rule 2004(c), the movant may subpoena documents from an entity compelled to appear for examination in the manner provided in Rule 9016. Fed. R. Bankr. P. 2004(c).

23. “The purpose of a Rule 2004 examination is to assist a party in interest in determining the nature and extent of the bankruptcy estate, revealing assets [and] examining transactions” In re Recoton Corp., 307 B.R. 751, 755 (Bankr. S.D.N.Y. 2004). As such, Rule 2004 is “the basic discovery device used in bankruptcy cases, permitting the examination of any party without the requirement of a pending adversary proceeding or contested matter.” In re J. Fife Symington, III, 209 B.R. 678, 683 (Bankr. D. Md. 1997) (internal quotations omitted). In addition, Rule 2004 examinations are “unfettered and broad” in scope. In re GHR Energy Corp., 33 B.R. 451, 453 (Bankr. D. Mass. 1983).

24. The Movant asserts that the proposed document requests fall within the scope of Rule 2004(a) as they pertain to a “matter which may affect the administration of the debtor’s estate” Fed. R. Bankr. P. 2004(b). Specifically, the examinations and related document requests are aimed at compelling the information necessary to properly identify individuals who were promoters in TelexFree’s operations and, more specifically, to confirm that those parties were entitled to file proof of claim forms to account for any losses incurred.

25. Prior to filing this Motion, Movant’s counsel contacted the Liquidating Trustee’s counsel to seek cooperation and to ensure an efficient procedures. **The Liquidating Trustee has not opposed the Motion. The Liquidating Trustee has requested that the subjects of**

the Motion be provided with notice and an opportunity to be heard before the Liquidating Trustee provides their personal information to the Movant.

26. For the foregoing reasons, the Movant asserts that the relief requested in this Motion is necessary and appropriate.

27. The Movant reserves all rights to seek further relief pursuant to Rule 2004 related to this matter, including, without limitation, to file subsequent motions seeking authority to conduct a Rule 2004 examination of the Liquidating Trustee or any other party, or to expand the scope of this request. The Liquidating Trustee reserves all of his rights and defenses in this regard.

WHEREFORE, the Movant respectfully requests that this Court enter an Order:

- a. Requiring that the Liquidating Trustee produce to Movant, at a time and place to be determined prior to any examination, all of the documents in his possession, custody, or control described in **Exhibit C** attached hereto;
- b. Authorizing the issuance of subpoenas to the Proposed Examinees pursuant to Fed. R. Bankr. P. 2004(c) and 9016; and
- c. Granting Movant such other and further relief as the Court deems just and proper.

Respectfully submitted,

CHRISTOPHER LOAIZA SALAZAR

By his attorney,

/s/ Christine E. Devine

Christine E. Devine, BBO# 566990
Law Office of Christine E. Devine, LLC
P.O. Box 7
Medway, MA 02053
Phone: 508-533-7240
Email: Christine@CDevineLaw.com

Dated: May 24, 2022

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re:

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

Reorganized Debtors.

**Chapter 11
Case No. 14-40987-EDK
Case No. 14-40988-EDK
Case No. 14-40989-EDK**

Jointly Administered

**ORDER ALLOWING ASSENTED-TO MOTION FOR AUTHORITY
TO COMPEL PRODUCTION OF
DOCUMENTS PURSUANT TO FED. R. BANKR. P. 2004**

Upon the Assented-To Motion for Authority to Compel Production of Documents Pursuant to Fed. R. Bankr. P. 2004 (the “Motion”) dated May 24, 2022 and filed by Christopher Loaiza Salazar (“Movant”), the Court finding sufficient notice of the Motion having been given; and no objection to the Motion having been filed or any such objection having been withdrawn or overruled;

NOW, THEREFORE, IT IS HEREBY ORDERED that:

1. The Motion is ALLOWED;
3. The Examinee shall produce to Movant, at a time and place to be determined prior to any examination, all of the documents described in “Exhibit C” attached to the Motion; and
4. Movant is authorized to issue subpoenas pursuant to Fed. R. Bankr. P. 2004(c) and 9016 in order to effectuate the examinations and document requests authorized by this Order.

Dated: _____, 2022

Honorable Elizabeth D. Katz
United States Bankruptcy Judge

Exhibit A



U.S. Department of Justice

Criminal Division

ENTREGADO POR COURIER

VAA:WHG:JMG:KDL:kms
DOJ: 182-52095; 182-56165; 182-54674

Office of International Affairs

Washington, D.C. 20530

1708 453-16

FISCALIA DE LA NACION
UNIDAD DE COOPERACION JUDICIAL
INTERNACIONAL Y EXTRADICIONES

April 6, 2017

12 ABR. 2017

RECIBIDO

Hora: 4:00

DEX 17-73238

MINISTERIO PUBLICO
FISCALIA DE LA NACION
SECRETARIA GENERAL

11 ABR. 2017

MESA DE PARTES

Hora: 16:16 Fs: 32 f. 01

Recepcionado por: J.C. Sobr...

Via EMAIL and FEDEX

Dra. Selena Chumbiray
Fiscalía, Ministerio Público
Unidad de Cooperación Judicial Internacional y Extradición
Fiscalía de la Nación
Av. Abancay, Cuadra 5 S/ No. piso 9
Cercado de Lima, Perú

FEDEX

Re: Request for Legal Assistance from Peru in the Matter of James Mattheir Merrill and Christopher Loiza Salazar (TelexFree) (Foreign Reference Numbers: Notes 5-3-M/111, 5-3-M/97, 5-3-M/48; U.S. Reference Numbers: 182-52095, 182-56165, 182-54674)

Dear Dra. Chumbiray:

The Office of International Affairs (OIA) received the three above referenced requests for legal assistance related to an investigation of the TelexFree company. In the request received in September 2015 via Note 5-3-M/111, Peruvian authorities asked U.S. authorities to locate James Mattheir Merrill (Merrill), determine the status of U.S. criminal proceedings against him, and to request his provisional arrest. In a subsequent request received in April 2016 via Note 5-3-M/48, Peruvian authorities asked U.S. authorities to provide information on TelexFree and to request a statement from Merrill regarding the facts under investigation. In the third request received in August 2016 via Note 5-3-M/97, Peruvian authorities asked U.S. authorities to inform them about the U.S. legal actions against TelexFree as well as Merrill. In September 2016, OIA informed Peru that it was unable to execute the requests due to the ongoing U.S. investigation of Merrill.

The U.S. proceedings have now ended, and Merrill pleaded guilty in March 2017. The prosecutor has provided responses to the requests, with the exception of providing a statement from Merrill, who is not willing to provide one. Please see the responses below. For a more detailed explanation of TelexFree, enclosed with this response is an affidavit filed by U.S. authorities in support of a criminal complaint against Merrill and Carlos Wanzeler (Wanzeler). Also included is a copy of TelexFree's business records and information obtained on the TelexFree recruiters and targets.

Response to Note 5-3-M/111

1. Merrill currently lives in Ashland, Massachusetts.
2. Merrill has been prosecuted by U.S. authorities for his role in the TelexFree pyramid scheme fraud. On March 22, 2017, a U.S. court sentenced Merrill to six years in prison for his role in that fraud. He will begin serving his sentence in May 2017.

Responses to Note 5-3-M/48 and Note 5-3-M/97

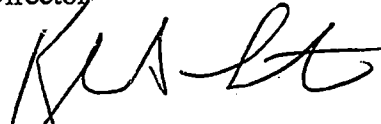
1. When it was in existence, TelexFree was a corporate entity registered in the state of Massachusetts.
2. TelexFree was formed in February 2012, from a prior corporate entity called Common Cents Communications. TelexFree was owned by Merrill, Wanzeler, and Carlos Costa. The entity claimed to provide telecommunications services.
3. TelexFree is now in bankruptcy and is no longer in operation. A trustee has been assigned by a U.S. bankruptcy court to oversee and organize TelexFree's business affairs and help return money to TelexFree's victims.
4. TelexFree was in fact a pyramid scheme – a fraudulent business that did not really sell much telephone service, but instead took in money from new participants and used it to pay bonuses and commissions to existing participants. Existing participants were paid to recruit new people into the scheme.
5. With regard to the TelexFree recruiters and participants mentioned in the request, we have collected information about them from TelexFree's electronic business data, enclosed in a series of Excel spreadsheets.

Our records reflect that the requests have been executed to the fullest extent possible. We greatly appreciate the assistance Peru has granted the United States in criminal justice matters over the years and look forward to continuing this cooperative relationship. Please do not hesitate to contact me at (202) 305-8309 or Kyle.Latimer@usdoj.gov, Trial Attorney Angela George at (202) 514-4653 or Angela.George@usdoj.gov, or the assigned International Affairs Specialists Katie Sizemore at (202) 305-4711 or Katie.Sizemore@usdoj.gov or Hallie Carde at (202) 305-3936 or Hallie.Carde@usdoj.gov if you have any questions.

Sincerely,

Vaughn A. Ary
Director

By:


Kyle D. Latimer
Senior Trial Attorney

Enclosures:

1. Certified Copy of Criminal Complaint
2. Spreadsheets containing TelexFree's business records and information obtained by U.S. Homeland Security Investigations (HSI) on the TelexFree recruiters and targets

Exhibit B

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION)

In re:

TELEX FREE, LLC, et al.,

Debtors.

Chapter 11

Case No. 14-40987 (MSH)

Case No. 14-40988 (MSH)

Case No. 14-40989 (MSH)

Jointly Administered

CLERK'S CERTIFICATE

I, Mary P. Sharon, Clerk of Court of the United States Bankruptcy Court for the District of Massachusetts, do hereby certify that an examination of the Docket in the above-entitled case indicates that on February 27, 2015, the Trustee, Stephen Darr, filed Schedule F – Creditors Holding Unsecured Nonpriority Claims (Part-2) in the case of the above referenced debtors. The following creditors are listed in that Schedule F:

Name	Page	Country	Amount	Address
Jose Antonio Callapiña Condori	18240	Peru	Unknown	Not Provided
Marcia Cecilia Cardenas Alvarez	18602	Peru	Unknown	Not Provided
Maria Elena Callapiña Condori	18640	Peru	Unknown	Not Provided
Tania Rocio Delgado Monge	19295	Peru	Unknown	Not Provided

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of this Court, at Boston, in the District of Massachusetts, this 23 day of March, 2020.



By:

Mary P. Sharon

Mary P. Sharon
Clerk of Court



Exhibit C

EXHIBIT C
(Documents Requested)

DEFINITIONS

1. “You” or “Your” shall mean the Liquidating Trustee, and where applicable, and any of the Liquidating Trustee’s predecessors, subsidiaries, affiliates, present and former directors and officers, present and former employees, representatives, investors, agents and all others acting or purporting to act on the Liquidating Trustee’s behalf.

2. “Communication(s)” shall mean every manner of disclosure, exchange, or transmittal, and every disclosure, exchange, or transmittal of information, in the form of facts, ideas, inquiries, or otherwise, whether orally or by document, or whether face-to-face, by telephone, mail, personal delivery, electronically, or otherwise, whether directly or indirectly, in any nature whatsoever, including but not limited to, correspondence, conversations, dialogues, interviews, consultations, agreements, and other understandings, among two or more persons. This definition includes, but is not limited to, letters, notes of conversations, contracts, email (in electronic or hard copy form), telegraph, telex, telecopier, facsimile, Internet, on-line service, and/or phone mail (in electronically recorded or transcribed form).

3. “Document(s)” shall be given the broadest interpretation and shall include, without limitation, all writings of every kind, source, and authorship, both originals and non-identical copies thereof, whether in draft or final form in your possession, custody, or control. The term “document(s)” also includes handwritten, typewritten, printed, photocopied, photographic, recorded or electronic stores or generated materials, including emails. The term “document(s)” also includes Communications in words, symbols, pictures, sound recordings, film, tapes, microfiche, microfilms, foils, slides, videos and information stored in, or accessible through computer, electronic, magnetic, magneto-optical, and optical means, including disks

and/or other information storage or retrieval systems, together with codes, and/or programming instructions and other material necessary to understand and use such systems.

4. “Related to” shall mean analyzing, considering, constituting, defining, evidencing, containing, describing, concerning, commenting, discussing, embodying, explaining, reflecting, detailing, identifying, mentioning, demonstrating, alluding to, referencing, comprising, setting forth, proposing, showing, edifying, stating, supporting, summarizing, referring to, dealing with or in any way pertaining to, in whole or in part, that subject.

DOCUMENT REQUESTS

1. With respect to the individuals listed below inclusive of variations of each name listed,¹ provide the following based upon the TelexFree books and records, to the extent such information is available: (i) Participant name; (ii) identification number, (iii) number of User Accounts; (iv) net winnings or net losses as computed by Huron Consulting Group (including monies received directly from TelexFree and paid directly to TelexFree, and receipts and payments arising from triangular transactions); (v) name of first User Account; (vi) date of registration for first User Account; (vii) invoice amount for first User Account; (viii) counterparty for First User Account; (ix) upline User Name; (x) Physical address; and (xi) electronic mail address; (xii) telephone number; (xiii) credits transferred by the individual to and from other Participants..

- a. Marcia Cecilia Cardenas Alvarez,
- b. Maria Cecilia Cardenas Alvarez,
- c. Maria Elena Callapiña Condori,

¹ For example, for Marcia Cecilia Cardenas Alvarez, please produce all Documents available for and related to: (i) Marcia Cecilia Cardenas Alvarez, (ii) Marcia Cecilia Cardenas, (iii) Marcia Cecilia Alvarez, (iv) Marcia Cardenas Alvarez, (v) Marcia Cardenas, and (vi) Marcia Alvarez.

- d. Maria Elena Callapira Condori,
 - e. Jose Antonio Callapiña Condori,
 - f. Jose Antonio Callapira Condori, and
 - g. Tania Rocio Delgado Monge.
2. With respect to each of the individuals listed as (a) through (g) above, inclusive of variations of each name listed,² provide the following:
- a. Identify the pleadings and court orders which created the process for filing proofs of claim in the TelexFree bankruptcy case;
 - b. A statement identifying whether service of the deadlines to file proofs of claim was made upon such individuals; and
 - c. A statement identifying whether any of such individuals filed proofs of claim and if any such claims were filed, provide copies of those claims.

² For example, for Marcia Cecilia Cardenas Alvarez, please produce all Documents available for and related to: (i) Marcia Cecilia Cardenas Alvarez, (ii) Marcia Cecilia Cardenas, (iii) Marcia Cecilia Alvarez, (iv) Marcia Cardenas Alvarez, (v) Marcia Cardenas, and (vi) Marcia Alvarez.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

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

Reorganized Debtors.

**Chapter 11
Case No. 14-40987-EDK
Case No. 14-40988-EDK
Case No. 14-40989-EDK
Substantively Consolidated**

CERTIFICATE OF SERVICE

The undersigned, Christine E. Devine, hereby certifies that a copy of the following has been sent to all parties listed on the Service List attached hereto in the manner noted thereon:

- **Uncontested Motion by Christopher Loaiza Salazar For Authority to Compel the Production of Documents Pursuant to Fed. R. Bankr. P. 2004, with proposed order thereon.**

Dated: May 24, 2022

/s/ Christine E. Devine
Christine E. Devine, Esq.
Law Office of Christine E. Devine, LLC
P.O. Box 7
Medway, MA 02053
Phone: 508-533-7240
Email: Christine@CDevineLaw.com

SERVICE LIST

Notice Provided Via Email:

Notice was sent to the list of interested parties below via the email addresses noted:

- Jose Antonio Callapiña Condori jositan12@gmail.com
- Maria Elena Callapiña Condori brendapaucarcallapina@gmail.com
- Marcia Cecilia Cardenas Alvarez marcia_414_2@hotmail.com
- Tania Rocio Delgado Monge michelguzmandelgado@gmail.com

CM/ECF Notice List

The following list of parties and attorneys receive electronic notice via CM/ECF:

- **William R. Baldiga** waldiga@brownrudnick.com
- **Charles R. Bennett** cbennett@murphyking.com,
bankruptcy@murphyking.com; imccormack@murphyking.com; ecf-ca5a5ac33a04@ecf.pacerpro.com
- **Kendra Berardi** kberardi@rc.com, mjewell@rc.com
- **Deena R. Bernstein** bernsteind@sec.gov, #brodocket@sec.gov
- **Roger Joseph Bertling** roger@bertlinglaw.com, rbertlin@law.harvard.edu
- **Robert J. Bonsignore** rbonsignore@class-actions.us
- **C. Elizabeth Brady Murillo** emurillo@burnslev.com
- **Alan L. Braunstein** abraunstein@riemerlaw.com,
ahall@riemerlaw.com; ndailey@riemerlaw.com
- **Douglas Brooks** dbrooks@libbyhoopes.com
- **Orestes G. Brown** obrown@metaxasbrown.com
- **Evans J. Carter** ejcattyl@verizon.net
- **Brian Casaceli** bcasaceli@mirickoconnell.com
- **John J. Commisso** john@johncommisso.com
- **Christopher M. Condon** cmc@murphyking.com,
imccormack@murphyking.com; ecf-06e49f159ba0@ecf.pacerpro.com
- **Gary W. Cruickshank** gwc@cruickshank-law.com,
cruickshankgr87938@notify.bestcase.com
- **Kathleen R. Cruickshank** kcruickshank@murphyking.com,
bankruptcy@murphyking.com; tlombardi@murphyking.com; ecf-f3829d9f3bd3@ecf.pacerpro.com
- **Ronald A. Dardeno** rdardeno@dardeno.com
- **Joseph P. Davis** davisjo@gtlaw.com
- **Adam K. Doerr** adoerr@rbh.com,
akelly@robinsonbradshaw.com, fbarringer@robinsonbradshaw.com
- **Martin B. Dropkin** nmatza@hotmail.com,
mdropkin@dropkinmatza.com; nastor@dropkinmatza.com
- **James P. Ehrhard** ehrhards@ehrhardslaw.com, cote@ehrhardslaw.com
- **Kate P. Foley** kfoley@mirickoconnell.com

- **Robert W. Fuller** rfuller@rbh.com
- **Andrew J. Gallo** andrew.gallo@bingham.com
- **Stuart M. Glass** sglass@choate.com
- **Matthew A. Gold** courts@argopartners.net
- **Valentin D. Gurvits** vgurvits@bostonlawgroup.com
- **William J. Hanlon** whanlon@seyfarth.com,
bosdocket@seyfarth.com,2875011420@filings.docketbird.com
- **Lawrence P. Heffernan** lheffernan@rc.com, kberardi@rc.com
- **Nellie E Hestin** nhestin@mcguirewoods.com,
mkrizan@mcguirewoods.com, aauld@mcguirewoods.com
- **Jonathan Horne** jhorne@murthalaw.com, lmulvehill@murthalaw.com
- **Franklin C. Huntington** huntingtonf@sec.gov
- **Christopher Hynes** chynes@dwyer-llc.com
- **Walter W. Jabs** Lawofficeswalterjabs@gmail.com
- **Vernon C. Jolley** jolleylaw@comcast.net
- **Paul V. Kelly** paul.kelly@jacksonlewis.com
- **Richard King** USTPRegion01.WO.ECF@USDOJ.GOV
- **Richard T. King** richard.t.king@usdoj.gov
- **Andrew G. Lizotte** agl@murphyking.com,
bankruptcy@murphyking.com;tlombardi@murphyking.com;ddk@murphyking.com;agl
@murphyking.com;ecf-
72a6723957cc@ecf.pacerpro.com;imccormack@murphyking.com
- **Danielle Andrews Long** dlong@rc.com
- **Shawn Lu** slu@murphyking.com, ppumphrey@murphyking.com;ecf-
8b8439714ea0@ecf.pacerpro.com
- **Michael M. McArdle** mike@mcardlelaw.com, morgan@mcardlelaw.com
- **S. Elaine McChesney** Elaine.mcchesney@bingham.com
- **Wendy M. Mead** wendymeadpc@verizon.net
- **Francis C. Morrissey** fcm@mwzllp.com
- **Edward J. Murphy** edward.j.murphy@usdoj.gov, northern.taxcivil@usdoj.gov
- **Harold B. Murphy** bankruptcy@murphyking.com, dkonusevska@murphyking.com
- **Maksim Nemtsev** menemtsev@gmail.com
- **Michael K. O'Neil** mko@rathlaw.com, fam@rathlaw.com
- **Robert Osol** rosol@melia-osol.com, cpleau@melia-osol.com;cgorka@melia-osol.com
- **F. Anthony Paganelli** tony@paganelligroup.com
- **Carmenelisa Perez-Kudzma** carmenelisa@pklolaw.com, evan@pklolaw.com
- **James Radke** jradke@murthalaw.com, lmulvehill@murthalaw.com
- **David P Reiner II** dpr@reinerslaw.com, eservice@reinerslaw.com
- **Ian D. Roffman** iroffman@nutter.com,
epleadings@nutter.com;cfeldman@nutter.com;kcannizzaro@nutter.com
- **Ilyas J. Rona** ijr@mrkklaw.com, gnc@mrkklaw.com, kae@mrkklaw.com
- **Mark C. Rossi** mark.rossi.esq@gmail.com; r44913@notify.bestcase.com
- **Paul S. Samson** psamson@riemerlaw.com, ahall@riemerlaw.com
- **Kenneth I. Schacter** kenneth.schacter@bingham.com
- **Hilary Schultz** hschultz@engelschultz.com
- **Ari M. Selman** ari.selman@bingham.com

- **Jordan L. Shapiro** JSLAWMA@aol.com
- **Matthew Shayefar** matt@bostonlawgroup.com
- **Monica Snyder** msnyder@murthalaw.com, jbabula@murthalaw.com
- **Lisa D. Tingue** lisa.d.tingue@usdoj.gov
- **Joseph Toomey** jtoomey@nutter.com
- **Thomas S. Vangel** tvangel@murthalaw.com
- **Sarah W. Walsh** sarah.walsh@jacksonlewis.com
- **Elton Watkins** watkinslaw@comcast.net
- **Jason C. Weida** Jason.weida@usdoj.gov

First Class Mail, Postage Prepaid:

Notice was sent to the following list of interested parties via first class mail at the addresses noted:

Lee A Armstrong
222 E. 41st Street
New York, NY 10017

Milton H. Barbarosh
Croft Investments Limited Partnership
265 S. Federal Hwy. #340
Deerfield, FL 33441

Kendra L. Berardi
Robinson and Cole LLP
One Boston Place, 25th Fl.
Boston, MA 02108

Tom Bourke
327 High Street
Ipswich, MA 01938

Andrea G. Brier
Murphy and King, P.C.
1 Beacon Street, 21st floor
Boston, MA 02108

Andrew J. Meyers, Broward Cty Atty
Governmental Center, Suite 423
115 South Andrews Avenue
Fort Lauderdale, FL 33301

D. Scott Carlton
Paul Hastings LLP
515 S. Flower Street, 25th Floor
Los Angeles, CA 90071

Edward Celani

40 Princeton Street, Apt 1
East Boston, MA 02128

Timothy S. Cory

DURHAM JONES & PINEGAR
10785 W. TWAIN AVE., STE 200
LAS VEGAS, NV 89135

Edward Dangel

10 Derne Street
Boston, MA 02114

Stephen Darr

Huron Consulting Group
100 High Street, 23rd Floor
Boston, MA 02210

Maria J. Diconza

GREENBERG TRAURIG, LLP
METLIFE BUILDING, 200 PARK AVE
NEW YORK, NY 10166

Daniel Dullea

Goldberg & Dullea
5 Briscoe Street
Beverly, MA 01915

Craig S. Dunlap

FENNEMORE CRAIG JONES VARGAS
300 S. FOURTH STREET #1400
LAS VEGAS, NV 89101

Sharon I. Dwoskin

Brown Rudnick LLP
One Financial Center
Boston, MA 02111

Kim Fatta

Blue to Green Realty
500 S. Australian Ave., Suite 600
West Palm Beach, FL 33401

Thomas H. Fell

3960 HOWARD HUGHES PKY
9TH FLR
LAS VEGAS, NV 89169

Lamar Fisher

Fisher Auction Company
2112 E Atlantic Blvd
Pompano Beach, FL 33062

Gregory E Garman

3960 HOWARD HUGHES PKY 9TH FLR
LAS VEGAS, NV 89169

Robert M. Goldstein

20 Park Plaza, Suite 1000
Boston, MA 02116

Dion W. Hayes

McGuirewoods LLP
One James Center
Richmond, VA 23219

Carol E Head

Morgan, Lewis & Bockius LLP
One Federal St.
Boston, MA 02110

Matthew Hinker

GREENBERG TRAURIG, LLP
200 PARK AVE
NEW YORK, NY 10166

Richard F. Holley

400 S. FOURTH ST., 3RD FLOOR
LAS VEGAS, NV 89101

Ihuoma Igboanugo

The Crescent Law Practice
P.O. Box 41333
Raleigh, NC 27692

Impact This Day Inc.

c/o Debra L. Squier
506 Roxbury Drive
Safety Harbor, FL 34695

Middleton W. Joseph

KPMG LLP
60 South Street
Boston, MA 02111

Terry Keller

Moeckler Realty
1883 Marina Mile Blvd., Suite 106
Fort Lauderdale, FL 33315

Nicholas R. Kennedy

McGuireWoods LLP, Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916

Jodi A. Kleinick

Law Firm of Paul Hastings LLP
75 East 55th Street
New York, NY 10022

Sandra W. Lavigna

U. S. SECURITIES AND EXCHANGE COMM.
5670 WILSHIRE BLVD, 11TH FLR
LOS ANGELES, CA 90036

Michael Lobie

US Dept of Justice
Tax Division, PO Box 55
Benjamin Franklin Station
Washington, DC 20044

Andrea L. Marconi

Fennemore Craig, P.C.
2394 East Camelback Rd., Ste 600
Phoenix, AZ 85016

David E. Meadows

King & Spalding LLP
1180 Peachtree Street
Atlanta, GA 30309-3521

Nancy A. Mitchell

Greenberg Traurig, LLC, MetLife Building
200 Park Avenue
New York, NY 10166

Carl L. Moore

U.S. Department of Justice, Tax Div.
P.O. Box 55 - Ben Franklin Station
Washington, DC 20001

Elizabeth C. Mueller

Law Firm of Paul Hastings LLP
515 S. Flower Street
Los Angeles, CA 90071

David L. Neale

Levene, Neale, Bender, Yoo & Brill LLP
10250 Constellation Blvd., Suite 1700
LOS ANGELES, CA 90067

Oracle America, Inc.

Buchalter, A Professional Corporation
Shawn M. Christianson
55 2nd St., 17th Fl.
San Francisco, CA 94105

Ronald P. Passatempo

Law Offices of Ronald P. Passatempo
200 Broadway Ste 102
Lynnfield, MA 01940

Teresa M. Pilatowicz

GORDON SILVER
3960 Howard Hughes Pkwy, 9th Flr
Las Vegas, NV 89169

William R. Baldiga

Brown Rudnick LLP
One Financial Center
Boston, MA 02111

Michael Saperstein

Paul E. Saperstein and Co., Inc.
44 Centre Street
Holbrook, MA 02343

Cristiana Seabra

12191 70th Street North
Largo, FL 33773

Simona Reyes Simon

1448 Hassell Ave
Las Vegas, NV 89106

Bruce A. Singal

Donoghue, Barrett & Singal, P.C.
One Beacon Street, 13th Floor
Boston, MA 02108

Phyllis B. Sumner

King & Spalding LLP
1180 Peachtree Street
Atlanta, GA 30309-3521

VonWin Capital Management, L.P.

80 West 40th Street
3rd Floor, Suite 33
New York, NY 10016

Lawrence A. Waks

JACKSON WALKER L.L.P.
901 Main Street, Suite 6000
Dallas, TX 75202

Mark M. Weisenmiller

GORDON SILVER LTD.
3960 Howard Hughes Pkwy
Las Vegas, NV 89169

Roger W Wenthe

UNITED STATES ATTORNEY
333 LAS VEGAS BLVD SO, #5000
LAS VEGAS, NV 89101

Thomas A. Zaccaro

Law Firm of Paul Hastings LLP
515 S. Flower Street
Los Angeles, CA 90071