Docket #0207 Date Filed: 8/8/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In re: TELEXFREE, LLC, TELEXFREE, INC., and TELEXFREE FINANCIAL, INC., Debtors.	Chapter 11 Case Nos. 14-40987-MSH, 14-40988-MSH, 14-40989-MSH (Jointly Administered)
WALDEMARA MARTINS AND LEANDRO VALENTIM – PUTATIVE CLAIMS REPRESENTATIVES AND THOSE SIMILARLY SITUATED, Plaintiffs, v. TELEXFREE, INC., f/k/a COMMON CENTS COMMUNICATIONS, INC. et al., Defendants.	Adversary Proceeding No. 14-04044-MSH

ANSWER BY STEPHEN DARR AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF TELEXFREE, INC., TELEXFREE, LLC AND TELEXFREE FINANCIAL, INC.

Stephen Darr, as the duly appointed and acting Trustee (the "Trustee") of the Chapter 11 Estates of TelexFree, Inc., TelexFree, LLC and TelexFree Financial, Inc. ("TelexFree"), states as follows:

1. No response is required.

2. Admitted.

3. The Trustee is without sufficient knowledge to admit or deny the allegations in paragraph 3.

4. The Trustee is without sufficient knowledge to admit or deny the allegations in paragraph 4.

5. Based on the information currently available, the Trustee believes that TelexFree was involved in a pyramid scheme. The Trustee does not necessarily adopt the characterization of the actions as "investment contracts."

6. The Trustee is without sufficient knowledge to admit or deny the allegations contained in paragraph 6.

7. The Trustee admits that TelexFree maintained an office in Marlborough. The Trustee does not necessarily agree with the characterization of the items sold as "unregistered securities."

8. Based on the information available to the Trustee, the Trustee believes the allegations in paragraph 8 are accurate.

9. Based on the information available to the Trustee, the Trustee believes the allegations in paragraph 9 are accurate.

10. No response is required.

11. Based on the information available to the Trustee, the Trustee believes that TelexFree was marketing memberships to various individuals.

12. Based on the information available to the Trustee, the Trustee believes that TelexFree was offering returns in excess of 200 percent or more.

13. Based on the information available, the Trustee believes the allegations in paragraph 13 are generally accurate.

14. Based on the information available, the Trustee believes the allegations in paragraph 14 are generally accurate.

15. Based on the information available, the Trustee believes the allegations in paragraph 15 are generally accurate.

16. Based on the information available, the Trustee believes the allegations in paragraph 16 are generally accurate.

17. Based on the information available, the Trustee believes the allegations in paragraph 17 are generally accurate.

18. Based on the information available, the Trustee believes the allegations in paragraph 18 are generally accurate.

19. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 19.

20. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 20.

21. Based on the information available, the Trustee believes the allegations in paragraph 21 are generally accurate.

22. The Trustee admits that TelexFree commenced a Chapter 11 proceeding on or about April 14, 2014. The Trustee is without sufficient knowledge to admit the balance of the allegations in paragraph 22.

23. The Trustee is still in the process of investigating the facts and circumstances surrounding TelexFree's business and has not drawn any conclusions whether TelexFree violated any federal or state securities laws.

24. The Trustee is still in the process of investigating the facts and circumstances surrounding TelexFree's business and has not drawn any conclusions whether TelexFree violated any federal or state securities laws.

25. The Trustee is still in the process of investigating the facts and circumstances surrounding TelexFree's business and has not drawn any conclusions whether TelexFree violated any federal or state securities laws.

26. The Trustee is still in the process of investigating the facts and circumstances surrounding TelexFree's business and has not drawn any conclusions whether TelexFree violated any federal or state securities laws.

27. Based on the information available to the Trustee, he believes that the allegations in paragraph 27 are generally true.

28. Based on the information available, the Trustee believes that the allegations in paragraph 28 are generally accurate.

29. The Trustee is still in the process of investigating the facts and circumstances surrounding TelexFree's business and has not drawn any conclusions whether TelexFree violated any federal or state securities laws.

30. The Trustee is still in the process of investigating the facts and circumstances surrounding TelexFree's business and has not drawn any conclusions whether TelexFree violated any federal or state securities laws.

31. No response is required.

32. Denied.

33. The Trustee agrees that venue would be proper within this district.

34. The Trustee agrees that certain of the claims set forth herein are core and certain of the claims may be noncore.

35. To the extent that the allegation is that jurisdiction vests in the United States District Court for the district of Nevada, the Trustee would deny same, and suggests that

jurisdiction may rest in the United States District Court for the District of Massachusetts; but the Trustee has not concluded his investigation and has reached no final conclusion with respect thereto.

36. The Trustee denies that venue would be proper in the United States Bankruptcy Court for the District of Nevada.

37. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 37, except the Trustee believes that certain of the individuals named in paragraph 37 may have participated and/or aided and abetted in the prosecution of an illegal pyramid scheme.

38. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 38, except the Trustee believes that certain of the individuals named in paragraph 37 may have participated and/or aided and abetted in the prosecution of an illegal pyramid scheme.

39. To the extent that the allegation is that jurisdiction vests in the United States District Court for the district of Nevada, the Trustee would deny same, and suggests that jurisdiction may rest in the United States District Court for the District of Massachusetts; but the Trustee has not concluded his investigation and has reached no final conclusion with respect thereto.

40. The Trustee denies that venue would be proper in the United States Bankruptcy Court for the District of Nevada.

41. The Trustee denies that venue would be proper in the United States Bankruptcy Court for the District of Nevada.

42. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 42.

43. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 43.

44. Admitted.

45. Admitted.

46. Admitted.

47. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 47.

48. Admitted.

49. Admitted.

50. Admitted.

51. Admitted.

52. Admitted.

53. Based on the information available to the Trustee, he believes the allegations in paragraph 53 are accurate.

54. Based on the information available to the Trustee, he believes the allegations in paragraph 54 are accurate.

55. Based on the information available to the Trustee, he believes the allegations in paragraph 55 are accurate.

56. Based on the information available to the Trustee, he believes the allegations in paragraph 56 are accurate.

57. Based on the information available to the Trustee, he believes the allegations in paragraph 57 are accurate.

58. Based on the information available to the Trustee, he believes the allegations in paragraph 58 are accurate.

59. Based on the information available to the Trustee, he believes the allegations in paragraph 59 are accurate.

60. Based on the information available to the Trustee, he believes the allegations in paragraph 60 are accurate.

61. Based on the information available to the Trustee, he believes the allegations in paragraph 61 are accurate.

62. Based on the information available to the Trustee, he believes the allegations in paragraph 62 are accurate.

63. Based on the information available to the Trustee, he believes the allegations in paragraph 63 are accurate.

64. Based on the information available to the Trustee, he believes the allegations in paragraph 64 are accurate.

65. Based on the information available to the Trustee, he believes the allegations in paragraph 65 are accurate.

66. Based on the information available to the Trustee, he believes the allegations in paragraph 66 are accurate.

67. Based on the information available to the Trustee, he believes the allegations in paragraph 67 are accurate.

68. Based on the information available to the Trustee, he believes the allegations in paragraph 68 are accurate.

69. Based on the information available to the Trustee, he believes the allegations in paragraph 69 are accurate.

70. Based on the information available to the Trustee, he believes the allegations in paragraph 70 are accurate.

71. Based on the information available to the Trustee, he believes the allegations in paragraph 71 are accurate.

72. Based on the information available to the Trustee, he believes the allegations in paragraph 72 are accurate.

73. Based on the information available to the Trustee, he believes the allegations in paragraph 73 are accurate.

74. Based on the information available to the Trustee, he believes the allegations in paragraph 74 are accurate.

75. Based on the information available to the Trustee, he believes the allegations in paragraph 75 are accurate.

76. Based on the information available to the Trustee, he believes the allegations in paragraph 76 are accurate.

77. Based on the information available to the Trustee, he believes the allegations in paragraph 77 are accurate.

78. Based on the information available to the Trustee, he believes the allegations in paragraph 78 are accurate.

79. Based on the information available to the Trustee, he believes the allegations in paragraph 79 are accurate.

80. Based on the information available to the Trustee, he believes the allegations in paragraph 80 are accurate.

81. Based on the information available to the Trustee, he believes the allegations in paragraph 81 are accurate.

82. Based on the information available to the Trustee, he believes the allegations in paragraph 82 are accurate.

83. Based on the information available to the Trustee, he believes the allegations in paragraph 83 are accurate.

84. Based on the information available to the Trustee, he believes the allegations in paragraph 84 are accurate.

85. Based on the information available to the Trustee, he believes the allegations in paragraph 85 are accurate.

86. Based on the information available to the Trustee, he believes the allegations in paragraph 86 are accurate.

87. Based on the information available to the Trustee, he believes the allegations in paragraph 87 are accurate.

88. Based on the information available to the Trustee, he believes the allegations in paragraph 88 are accurate.

89. Based on the information available to the Trustee, he believes the allegations in paragraph 89 are accurate.

90. Based on the information available to the Trustee, he believes the allegations in paragraph 89 are accurate.

91. Based on the information available to the Trustee, he believes the allegations in paragraph 91 are accurate.

92. Based on the information available to the Trustee, he believes the allegations in paragraph 92 are accurate.

93. Based on the information available to the Trustee, he believes the allegations in paragraph 93 are accurate.

94. Based on the information available to the Trustee, he believes the allegations in paragraph 94 are accurate.

95. Based on the information available to the Trustee, he believes the allegations in paragraph 95 are accurate.

96. Based on the information available to the Trustee, he believes the allegations in paragraph 96 are accurate.

97. Based on the information available to the Trustee, he believes the allegations in paragraph 97 are accurate.

98. Based on the information available to the Trustee, he believes the allegations in paragraph 98 are accurate.

99. Based on the information available to the Trustee, he believes the allegations in paragraph 99 are accurate.

100. Based on the information available to the Trustee, he believes the allegations in paragraph 100 are accurate.

101. Based on the information available to the Trustee, he believes the allegations in paragraph 101 are accurate.

102. Based on the information available to the Trustee, he believes the allegations in paragraph 102 are accurate.

103. Based on the information available to the Trustee, he believes the allegations in paragraph 103 are accurate.

104. Based on the information available to the Trustee, he believes the allegations in paragraph 104 are accurate.

105. Based on the information available to the Trustee, he believes the allegations in paragraph 105 are accurate.

106. Based on the information available to the Trustee, he believes the allegations in paragraph 106 are accurate.

107. The Trustee has no knowledge with respect to the allegations in paragraph 107.

108. Based on the information available to the Trustee, he believes the allegations in paragraph 108 are accurate.

109. Based on the information available to the Trustee, he believes the allegations in paragraph 109 are accurate.

110. Based on the information available to the Trustee, he believes the allegations in paragraph 110 are accurate.

111. Based on the information available to the Trustee, he believes the allegations in paragraph 111 are accurate.

112. The Trustee believes paragraph 112 to be accurate.

113. The Trustee has not concluded his investigation and, therefore, has not reached a conclusion with respect to the interrelationship between TelexFree, LLC and TelexFree, Inc., and therefore has insufficient knowledge to respond to the allegations in paragraph 113.

114. The Trustee believes the allegations in paragraph 114 to be true.

115. The Trustee believes the allegations in paragraph 115 to be true.

116. The Trustee believes the allegations in paragraph 116 to be true.

117. The Trustee believes the allegations in paragraph 117 to be true.

118. The Trustee believes the allegations in paragraph 118 to be true.

119. The Trustee believes the allegations in paragraph 119 to be true.

120. The Trustee believes the allegations in paragraph 120 to be true.

121. The Trustee believes the allegations in paragraph 121 to be true.

122. The Trustee has not concluded his investigation, and therefore has insufficient knowledge to respond to the allegations in paragraph 122.

123. The Trustee has not concluded his investigation, and therefore has insufficient knowledge to respond to the allegations in paragraph 123.

124. The Trustee believes the allegations in paragraph 124 to be accurate.

125. The Trustee believes the allegations in paragraph 125 to be accurate.

126. The Trustee believes the allegations in paragraph 126 to be accurate.

127. The Trustee believes the allegations in paragraph 127 to be accurate.

128. The Trustee believes the allegations in paragraph 128 to be accurate.

129. The Trustee believes the allegations in paragraph 129 to be accurate.

130. The Trustee is without sufficient knowledge to admit the allegations in paragraph 130.

131. The Trustee is without sufficient knowledge to admit the allegations in paragraph 131.

132. The Trustee believes the allegations in paragraph 132 to be accurate.

133. The Trustee has not concluded his investigation, and therefore is without sufficient knowledge to respond to the allegations in paragraph 133.

134. The Trustee believes the allegations in paragraph 134 to be accurate.

135. The Trustee is without sufficient knowledge to respond to the allegations in paragraph 135.

136. The Trustee admits that TelexFree, LLC and TelexFree Financial, Inc. and TelexFree, Inc. filed for protection under Chapter 11 of the Bankruptcy Code on or about April 14, 2014, in the United States Bankruptcy Court for the District of Nevada.

137. Based on information available, the Trustee believes the allegations in paragraph 137 to be accurate.

138. Based on information available, the Trustee believes the allegations in paragraph 138 to be accurate.

139. Based on information available, the Trustee believes the allegations in paragraph 139 to be accurate.

140. The Trustee is without sufficient knowledge to respond to the allegations in paragraph 140.

141. The Trustee believes the allegations contained in paragraph 141 to be accurate.

142. Based on the information available, the Trustee believes the allegations in paragraph 142 to be accurate.

143. The Trustee has not concluded his investigation, and therefore cannot respond to the allegations in paragraph 143.

144. The Trustee is without sufficient knowledge to admit the allegations in paragraph 144.

145. The Trustee is without sufficient knowledge to admit the allegations in paragraph 145.

146. Based on the information available, the Trustee believes the allegations in paragraph 146 are accurate.

147. Based on the information available, the Trustee believes the allegations in paragraph 147 are accurate.

148. Based on the information available to the Trustee, he believes that there were certain payments made following the March announcement. He has insufficient knowledge as to the exact amount made.

149. The Trustee has insufficient knowledge to respond to the allegations contained in paragraph 149, but believes them to be generally accurate.

150. The Trustee has insufficient knowledge to admit the allegations in paragraph 150, except the Trustee has been advised that 1099 Forms were mailed to at least some participants.

151. The Trustee has insufficient knowledge to admit the allegations in paragraph 151, except the Trustee has been advised that 1099 Forms were mailed to at least some participants.

152. The Trustee has insufficient knowledge to admit the allegations in paragraph 152, except the Trustee has been advised that 1099 Forms were mailed to at least some participants.

153. Based on the information available to the Trustee, the Trustee believes that the allegation in paragraph 153 is accurate.

154. Based on the information available to the Trustee, the Trustee believes that the allegation in paragraph 154 is accurate.

155. Based on the information available to the Trustee, the Trustee believes that the allegation in paragraph 155 is accurate.

156. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 156.

157. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 157.

158. Based on the information available to the Trustee, he believes the allegations contained in paragraph 158 are accurate.

159. Based on the information available to the Trustee, he believes the allegations contained in paragraph 159 are accurate.

160. Based on the information available to the Trustee, he believes the allegations contained in paragraph 160 are accurate.

161. Based on the information available to the Trustee, he believes the allegations contained in paragraph 161 are accurate.

162. Based on the information available to the Trustee, he believes the allegations contained in paragraph 162 are accurate.

163. Based on the information available to the Trustee, he believes the allegations contained in paragraph 163 are accurate.

164. Based on the information available to the Trustee, he believes the allegations contained in paragraph 164 are accurate.

165. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

166. Based on the information available to the Trustee, the Trustee believes that TelexFree made a loan to TelexFree Electric. The Trustee believes the amount of the loan is greater than that specified in paragraph 166.

167. Based on the information available to the Trustee, the Trustee believes that TelexFree made a loan to TelexFree Mobile. The Trustee believes the amount of the loan is greater than that specified in paragraph 167.

168. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

169. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

170. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

171. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

172. Based on the information available, the Trustee believes that the allegations in paragraph 172 are accurate.

173. Based on the information available, the Trustee believes that the allegations in paragraph 173 are accurate.

174. Based on the information available, the Trustee believes that the allegations in paragraph 174 are accurate.

175. Based on the information available, the Trustee believes that the allegations in paragraph 175 are accurate.

176. Based on the information available, the Trustee believes that the allegations in paragraph 176 are accurate.

177. Based on the information available, the Trustee believes that the allegations in paragraph 177 are accurate.

178. Based on the information available, the Trustee believes that the allegations in paragraph 178 are accurate.

179. The Trustee has no knowledge of what testimony was obtained by the Office of the Secretary of the Commonwealth of Massachusetts ("SOC"), and therefore cannot respond to the specific allegation contained in paragraph 179, but the Trustee believes the general statement to be accurate.

180. The Trustee has no knowledge of what testimony was obtained by the SOC, and therefore cannot respond to the specific allegation contained in paragraph 180, but the Trustee believes the general statement to be accurate.

181. Based on the information available, the Trustee believes the allegations contained in paragraph 181 are accurate.

182. Based on the information available, the Trustee believes the allegations contained in paragraph 182 are accurate.

183. Based on the information available, the Trustee believes the allegations contained in paragraph 183 are accurate.

184. Based on the information available, the Trustee believes the allegations contained in paragraph 184 are accurate.

185. Based on the information available, the Trustee believes the allegations contained in paragraph 185 are accurate.

186. Based on the information available, the Trustee believes the allegations contained in paragraph 186 are accurate.

187. Based on the information available, the Trustee believes the allegations contained in paragraph 187 are accurate.

188. Based on the information available, the Trustee believes the allegations contained in paragraph 188 are accurate.

189. Based on the information available, the Trustee believes the allegations contained in paragraph 189 are accurate.

190. Based on the information available, the Trustee believes the allegations contained in paragraph 190 are accurate.

191. Based on the information available, the Trustee believes the allegations contained in paragraph 191 are accurate.

192. Based on the information available, the Trustee believes the allegations contained in paragraph 192 are accurate.

193. Based on the information available, the Trustee believes the allegations contained in paragraph 193 are accurate.

194. Based on the information available, the Trustee believes the allegations contained in paragraph 194 are accurate.

195. Based on the information available, the Trustee believes the allegations contained in paragraph 195 are accurate.

196. Based on the information available to the Trustee, and principally the Administrative Complaint filed by the SOC, the allegations in paragraph 196 appear to be accurate.

197. Based on the information available to the Trustee, and principally the Administrative Complaint filed by the SOC, the allegations in paragraph 197 appear to be accurate.

198. Based on the information available to the Trustee, and principally the Administrative Complaint filed by the SOC, the allegations in paragraph 198 appear to be accurate.

199. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

200. The Trustee is in the process of investigating the relationship between the various entities and has not reached any conclusions with respect thereto.

201. Based on the information available, the Trustee believes the allegations in paragraph 201 are accurate.

202. Based on the information available, the Trustee believes the allegations in paragraph 202 are accurate.

203. Based on the information available, the Trustee believes the allegations in paragraph 203 are accurate.

204. Based on the information available, the Trustee believes the allegations in paragraph 204 are accurate.

205. The Trustee is without sufficient knowledge and, therefore, cannot admit the allegations in paragraph 205.

206. The Trustee is without sufficient knowledge and, therefore, cannot admit the allegations in paragraph 206.

207. Based on the information available to the Trustee, he believes the allegations contained in paragraph 207 are accurate.

208. Based on the information available to the Trustee, he believes that the attorney reference din paragraph 208 acted as legal counsel to TelexFree.

209. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 209 and, therefore, cannot admit same.

210. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 210 and, therefore, cannot admit same.

211. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 211 and, therefore, cannot admit same.

212. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 212 and, therefore, cannot admit same.

213. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 213 and, therefore, cannot admit same.

214. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 214 and, therefore, cannot admit same.

215. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 215 and, therefore, cannot admit same.

216. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 216 and, therefore, cannot admit same.

217. The Trustee is without sufficient knowledge as to the allegations contained in paragraph 217 and, therefore, cannot admit same.

218. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 218.

219. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 219.

220. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 220.

221. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 221.

222. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 222.

223. The Trustee is in the process of conducting his investigation into this matter, and therefore has drawn no conclusions with respect to the involvement and/or liability of the "Attorney Defendants."

224. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 224. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

225. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 225. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

226. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 226. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

227. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 227. Further, the Trustee is in the process of conducting an investigation and has not

reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

228. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 228. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

229. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 229. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

230. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 230. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

231. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 231. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

232. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 232. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

233. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 233. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

234. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 234. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

235. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 231. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

236. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 231. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

237. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 237. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

238. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 238.

239. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 239.

240. The Trustee admits that in order to maintain a Ponzi scheme, the perpetrator needs a constant influx of cash.

241. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 241. Further, the Trustee is in the process of investigating the relationship between the Debtors and the "Attorney Defendants" and, therefore, has not reached a conclusion with respect to their relationship or involvement in the activities of the Debtors.

242. Based on the information available, the Trustee believes the allegations in paragraph 242 generally to be true.

243. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 243.

244. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 244.

245. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 245.

246. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 246.

247. The Trustee has insufficient knowledge to admit the allegations contained in paragraph 247.

248. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 248. Further, the Trustee is in the process of conducting an investigation and has not

reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

249. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 249. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

250. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 250. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

251. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 251. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

252. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 252. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

253. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 253. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

254. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 254. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

255. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 255. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

256. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 256. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

257. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 257. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

258. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 258. Further, the Trustee is in the process of conducting an investigation and has not reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

259. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 259. Further, the Trustee is in the process of conducting an investigation and has not

reached any conclusions without respect to the role of the Attorney Defendants in the pyramid scheme.

260. Based on the information available to the Trustee, he believes that the Defendant Craft provided accounting services to the Debtors and may at one time have served as the chief financial officer for the Debtors.

261. Based on the information available to the Trustee, he believes the allegations in paragraph 261 to be true.

262. The Trustee is conducting an investigation and has not reached a conclusion with respect to the allegations contained in paragraph 262.

263. The Trustee is conducting an investigation and has not reached a conclusion with respect to the allegations contained in paragraph 263.

264. The Trustee is conducting an investigation and has not reached a conclusion with respect to the allegations contained in paragraph 264.

265. Based on the information available to the Trustee, he believes the allegations in paragraph 265 to be accurate.

266. Based on the information available to the Trustee, he believes the allegations in paragraph 266 to be accurate.

267. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 267 to be accurate.

268. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 268 to be accurate.

269. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 269 to be accurate.

270. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 270 to be accurate.

271. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 271 to be accurate.

272. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 272 to be accurate.

273. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 273 to be accurate.

274. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 274 to be accurate.

275. Based on the information available to the Trustee, primarily gathered from the SOC Administrative Complaint, he believes the allegations in paragraph 275 to be accurate.

276. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

277. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

278. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

279. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

280. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

281. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

282. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

283. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

284. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

285. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

286. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

287. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

288. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

289. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

290. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

291. The Trustee is conducting an investigation and has not reached any conclusions with respect to the involvement of various financial institutions in the pyramid scheme.

292. Based on the information available, the Trustee believes that the allegations in paragraph 292 are generally accurate.

293. Based on the information available, the Trustee believes that the allegations in paragraph 293 are generally accurate.

294. Based on the information available, the Trustee believes that the allegations in paragraph 294 are generally accurate.

295. The Trustee is without sufficient knowledge to admit the allegations in paragraph 295.

296. Based on the information available, the Trustee believes that the allegations in paragraph 296 are generally accurate, but cannot admit to specific allegations.

297. The Trustee is conducting an investigation and has not reached any conclusions with respect to the amount of money received by TelexFree.

298. The statements contained in paragraph 298 are generally accurate.

299. Based on the information available, the Trustee believes the statements contained in paragraph 299 are generally accurate.

300. The Trustee is without sufficient knowledge to admit the specific allegations contained in paragraph 300.

301. The Trustee has not concluded his investigation, and therefore cannot respond to the allegations in paragraph 301.

302. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 302.

283. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 283.

284. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 284.

285. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 285.

286. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 286.

287. Based on the information available, the Trustee believes the allegations contained in paragraph 287 are generally accurate.

288. Based on the information available to the Trustee, the Trustee believes the allegations contained in paragraph 288 are generally accurate.

289. The Trustee is in the process of investigating the business of the Debtors, and has not reached any conclusions so as to be able to respond to paragraph 289.

290. The Trustee is in the process of investigating the business of the Debtors, and has not reached any conclusions so as to be able to respond to paragraph 290.

291. No response to paragraph 291 is required.

292. The Trustee is without sufficient knowledge to admit the allegations contained in paragraph 292.

293. Based on the information available to the Trustee, the Trustee believes that the allegations in paragraph 293 are accurate.

294. Based on the information available to the Trustee, the Trustee believes that the allegations in paragraph 294 are accurate.

295. Based on the information available to the Trustee, the Trustee believes the allegations contained in paragraph 295 are accurate, except the Trustee has no knowledge with respect to the allegations that certain technology was borrower from Disk A Vontade.

296. The Trustee is without sufficient knowledge to admit the allegations in paragraph 296.

297. Based on the information available to the Trustee, he believes the allegations contained in paragraph 297 are accurate.

298. Based on the information available to the Trustee, he believes the allegations contained in paragraph 298 are accurate.

299. Based on the information available to the Trustee, he believes the allegations contained in paragraph 299 are accurate.

300. Based on the information available to the Trustee, he believes the allegations contained in paragraph 300 are accurate.

301. Based on the information available to the Trustee, he believes the allegations contained in paragraph 301 are accurate.

302. Based on the information available to the Trustee, he believes the allegations contained in paragraph 302 are accurate.

303. Based on the information available to the Trustee, he believes the allegations contained in paragraph 303 are accurate.

304. Based on the information available to the Trustee, he believes the allegations contained in paragraph 304 are accurate.

305. Based on the information available to the Trustee, he believes the allegations contained in paragraph 305 are accurate.

306. Based on the information available to the Trustee, he believes the allegations contained in paragraph 306 are accurate.

307. Based on the information available to the Trustee, he believes the allegations contained in paragraph 307 are accurate.

308. Based on the information available to the Trustee, he believes the allegations contained in paragraph 308 are accurate.

309. Based on the information available to the Trustee, he believes the allegations contained in paragraph 309 are accurate.

310. The Trustee is without sufficient knowledge to admit the allegations in paragraph 310.

311. Based on the information available to the Trustee, he believes the allegations contained in paragraph 311 are accurate.

312. Based on the information available to the Trustee, he believes the allegations contained in paragraph 312 are accurate.

313. Based on the information available to the Trustee, he believes the allegations contained in paragraph 313 are accurate.

314. The Trustee is without knowledge as to what testimony is being referred to; therefore, he cannot admit the allegations in paragraph 314.

315. Based on the information available to the Trustee, he believes the allegations contained in paragraph 315 are accurate.

316. Based on the information available to the Trustee, he believes the allegations contained in paragraph 316 are accurate.

317. Based on the information available to the Trustee, he believes the allegations contained in paragraph 317 are accurate.

318. The Trustee is without sufficient knowledge to admit the allegations in paragraph 318.

319. The Trustee is without sufficient knowledge to admit the allegations in paragraph 319.

320. The Trustee is without sufficient knowledge to admit the allegations in paragraph 320.

321. The Trustee is without sufficient knowledge to admit the allegations in paragraph 321.

322. The Trustee is without sufficient knowledge to admit the allegations in paragraph 322.

323. The Trustee is without sufficient knowledge to admit the allegations in paragraph 323.

324. Based on the information available to the Trustee, he believes the allegations contained in paragraph 324 are accurate.

325. Based on the information available to the Trustee, he believes the allegations contained in paragraph 325 are accurate.

326. Based on the information available to the Trustee, he believes the allegations contained in paragraph 326 are accurate.

327. The Trustee is without sufficient knowledge to admit the allegations in paragraph 327.

328. The Trustee is without sufficient knowledge to admit the allegations in paragraph 328.

329. The Trustee is without sufficient knowledge to admit the allegations in paragraph 329.

330. The Trustee is without sufficient knowledge to admit the allegations in paragraph 330.

331. The Trustee is without sufficient knowledge to admit the allegations in paragraph 331.

332. The Trustee is without sufficient knowledge to admit the allegations in paragraph 332.

333. The Trustee is without sufficient knowledge to admit the allegations in paragraph 333.

334. The Trustee is without sufficient knowledge to admit the allegations in paragraph 334.

335. The Trustee is without sufficient knowledge to admit the allegations in paragraph 335.

336. The Trustee is without sufficient knowledge to admit the allegations in paragraph 336.

337. The Trustee is without sufficient knowledge to admit the allegations in paragraph 337.

338. The Trustee is without sufficient knowledge to admit the allegations in paragraph 338.

339. The Trustee is without sufficient knowledge to admit the allegations in paragraph 339.

340. The Trustee is without sufficient knowledge to admit the allegations in paragraph 340.

341. The Trustee has not completed his investigation and has drawn no conclusions as to the relationship, and therefore cannot admit the allegations in paragraph 341.

342. The Trustee is without sufficient knowledge to admit the allegations in paragraph 342.

343. The Trustee believes the allegations with respect to Wanzeler and Merrill's ownership in TelexFree is accurate. The Trustee is without sufficient knowledge to admit the balance of the allegations in paragraph 343.

344. The Trustee is without sufficient knowledge to admit the allegations in paragraph 344.

345. The Trustee is without sufficient knowledge to admit the allegations in paragraph 345.

346. The Trustee is without sufficient knowledge to admit the allegations in paragraph 346.

347. The Trustee is without sufficient knowledge to admit the allegations in paragraph 347.

348. The Trustee is in the process of conducting an investigation and has not concluded same, and therefore cannot respond to the allegations in paragraph 348.

349. Based on the information available to the Trustee, he believes the allegations in paragraph 349 are accurate.

350. The Trustee is without sufficient knowledge to admit the allegations in paragraph 350.

351. The Trustee is without sufficient knowledge to admit the allegations in paragraph 351.

352. The Trustee is without sufficient knowledge to admit the allegations in paragraph 352.

353. The Trustee is without sufficient knowledge to admit the allegations in paragraph 353.

354. Based on the information available to the Trustee, he understands there were certain changes made to the TelexFree compensation plan; otherwise, he cannot admit the allegations in paragraph 354.

355. Based on the information available to the Trustee, he understands there were certain changes made to the TelexFree compensation plan; otherwise, he cannot admit the allegations in paragraph 355.

356. Based on the information available to the Trustee, he understands there were certain changes made to the TelexFree compensation plan; otherwise, he cannot admit the allegations in paragraph 356.

357. Based on the information available to the Trustee, he understands there were certain changes made to the TelexFree compensation plan; otherwise, he cannot admit the allegations in paragraph 357.

358. Based on the information available to the Trustee, he understands there were certain changes made to the TelexFree compensation plan; otherwise, he cannot admit the allegations in paragraph 358.

359. Based on the information available to the Trustee, the Trustee believes the allegations in paragraph 359 to be generally accurate.

360. Based on the information available to the Trustee, the Trustee believes the allegations in paragraph 360 to be generally accurate.

361. The Trustee is without sufficient knowledge to admit the allegations in paragraph 361.

362. Based on the information available to the Trustee, the Trustee does not believe the allegations in paragraph 362 are accurate. The Trustee does believe that Merrill and Wanzeler have interests in entities which may be general partners in TelexElectric.

363. Based on the information available, the Trustee believes that TelexElectric received funds from TelexFree. The Trustee cannot admit the balance of the allegations in paragraph 363.

364. Based on the information available, the Trustee believes that TelexElectric received funds from TelexFree. The Trustee cannot admit the balance of the allegations in paragraph 364.

365. The Trustee is in the process of conducting his investigation and has reached no conclusions, and therefore cannot respond to the allegations in paragraph 365.

366. The Trustee is in the process of conducting his investigation and has reached no conclusions, and therefore cannot respond to the allegations in paragraph 366.

367. The Trustee understands that the Plaintiffs seek class certification. The Trustee does not believe it is appropriate under the circumstances.

368. The Trustee understands that the Plaintiffs seek class certification. The Trustee does not believe it is appropriate under the circumstances.

369. The Trustee understands that the Plaintiffs seek class certification. The Trustee does not believe it is appropriate under the circumstances.

370. The Trustee understands that the Plaintiffs seek class certification. The Trustee does not believe it is appropriate under the circumstances.

371. The Trustee understands that the Plaintiffs seek class certification. The Trustee does not believe it is appropriate under the circumstances.

372. The Trustee understands that the Plaintiffs seek class certification. The Trustee does not believe it is appropriate under the circumstances.

373. The Trustee does not believe that the allegations in paragraph 373 are accurate.

374. The Trustee does not believe that the allegations in paragraph 374 are accurate, at least as to the claims against the Debtors.

375. The Trustee denies the allegations in paragraph 375 and states that the Trustee is in the process of reviewing the claims and dealing with the various victims in a cooperative approach with the Securities and Exchange Commission.

376. The Trustee repeats his answers to the allegations contained in paragraphs 1-375.

377. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 377.

378. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 378.

379. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 379.

380. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 380.

381. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 381.

382. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 382.

383. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 383.

384. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 384.

385. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 385.

386. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 386.

387. The Trustee incorporates his answers to paragraphs 1-386 above.

388. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 388.

389. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 389.

390. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 390.

391. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 391.

392. The Trustee incorporates his answers his answers to paragraphs 1-391.

393. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 393.

394. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 394.

395. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 395.

396. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 396.

397. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 397.

398. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 398.

399. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 399.

400. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 400.

401. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 401.

402. The Trustee incorporates his answers to paragraphs 1-401.

403. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 403.

404. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 404.

405. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 405.

406. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 406.

407. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 407.

408. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 408.

409. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 409.

410. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 410.

411. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 411.

412. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 312.

413. The Trustee incorporates his answers to paragraphs 1-412 above.

414. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 414.

415. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 415.

416. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 416.

417. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 417.

418. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 418.

419. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 419.

420. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 420.

421. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 421.

422. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 422.

423. The Trustee repeats his answers to paragraphs 1-422 above.

424. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 424.

425. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 425.

426. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 426.

427. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 427.

428. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 428.

429. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 429.

430. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 430.

431. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 431.

432. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 432.

433. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 433.

434. The Trustee incorporates his answers to paragraphs 1-433 above.

435. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 435.

436. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 436.

437. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 437.

438. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 438.

439. The Trustee incorporated his answers to paragraphs 1-438 above.

440. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 440.

441. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 441.

442. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 442.

443. The Trustee incorporates his answers to paragraphs 1-442 above.

444. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 444.

445. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 445.

446. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 446.

447. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 447.

448. The Trustee incorporates his answers to paragraphs 1 through 447 above.

449. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 449.

450. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 450.

451. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 451.

452. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 452.

453. The Trustee incorporates his answers to paragraphs 1-452 above.

454. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 454.

455. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 455.

456. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 456.

457. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 457.

458. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 458.

459. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 459.

460. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 460.

461. The Trustee incorporates his answers to paragraphs 1-460 above.

462. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 462.

463. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 463.

464. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 464.

465. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 465.

466. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 466.

467. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 467.

468. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 468.

469. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 469.

470. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 470.

471. The Trustee incorporates his answers to paragraphs 1-470 above.

472. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 472.

473. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 473.

474. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 474.

475. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 475.

476. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 476.

477. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 477.

478. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 478.

479. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 479.

480. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 480.

481. The Trustee incorporates his answers to paragraphs 1-480 above.

482. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 482.

483. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 483.

484. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 484.

485. The Trustee incorporates his answers to paragraphs 1-484 above.

486. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 486.

487. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 487.

488. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 488.

489. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 489.

490. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 490.

491. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 491.

492. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 492.

493. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 493.

494. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 494.

495. The Trustee incorporates his answers to paragraph 1-494 above.

496. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 496.

497. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 497.

498. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 498.

499. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 499.

500. The Trustee incorporates his answers to paragraphs 1-499 above.

501. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 501.

502. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 502.

503. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 503.

504. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 504.

505. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 505.

506. The Trustee incorporates his answers to paragraphs 1-505 above.

507. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 507.

508. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 508.

509. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 509.

510. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 510.

511. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 511.

512. The Trustee incorporates his answers to paragraphs 1-511 above.

513. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 513.

514. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 514.

515. The Trustee incorporates his answers to paragraphs 1-514 above.

516. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 516.

517. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 517.

518. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 518.

519. The Trustee incorporates his answers to paragraphs 1-518 above.

520. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 520.

521. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 521.

522. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 522.

523. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 523.

524. The Trustee incorporates his answers to paragraphs 1-523 above.

525. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 523.

526. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 526.

527. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 527.

528. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 528.

529. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 529.

530. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 530.

531. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 531.

532. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 532.

533. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 533.

534. The Trustee incorporates his answers to paragraphs 1-533 above.

535. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 535.

536. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 536.

537. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 537.

538. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 538.

539. The Trustee is in the process of conducting an investigation, and until he has concluded his investigation, he cannot respond to the allegations in paragraph 539.

STEPHEN DARR AS HE IS THE TRUSTEE OF THE CHAPTER 11 ESTATES OF TELEXFREE, INC., TELEXFREE, LLC AND TELEXFREE FINANCIAL, INC.

/s/ Charles R. Bennett, Jr.
Charles R. Bennett, Jr., Esq. (BBO #037380)
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Boston, MA 02108
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Facsimile: 617.423.0498
Email: cbennett@murphyking.com

CERTIFICATE OF SERVICE

I, Charles R. Bennett, Jr., hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Dated: August 8, 2014

/s/ Charles R. Bennett, Jr.
Charles R. Bennett, Jr.

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