


B1040 (FORM 1040) (12/15)

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (Court Use Only)	
PLAINTIFFS Stephen Darr, as he is the Trustee of the Chapter 11 Estates of Each of the Debtors		DEFENDANTS Opt3 Solutions, Inc., Jay Borrromei	
ATTORNEYS (Firm Name, Address, and Telephone No.) Andrew G. Lizotte, Esq. Murphy & King, Professional Corporation One Beacon Street Boston, MA 02108 (617) 423-0400 Fax: (617) 423-0498		ATTORNEYS (If Known)	
PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input checked="" type="checkbox"/> Trustee		PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUES INVOLVED) To recover payments made to the Defendants within two years of the bankruptcy filings as fraudulent transfers and to recover payments made within one year of the bankruptcy filings as insider preferential transfers.			
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)			
FRBP 7001(1) - Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input checked="" type="checkbox"/> 12-Recovery of money/property - §547 preference <input checked="" type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input type="checkbox"/> 14-Recovery of money/property - other		FRBP 7001(6) - Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other	
FRBP 7001(2) - Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property		FRBP 7001(7) - Injunctive Relief <input type="checkbox"/> 71-Injunctive relief - imposition of stay <input type="checkbox"/> 72-Injunctive relief - other	
FRBP 7001(3) - Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h)		FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest	
FRBP 7001(4) - Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e)		FRBP 7001(9) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment	
FRBP 7001(5) - Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation		FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause	
FRBP 7001(6) - Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny (continued next column)		Other <input type="checkbox"/> SS-SIPA Case - 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)	
<input type="checkbox"/> Check if this case involves a substantive issue of state law		<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23	
<input type="checkbox"/> Check if a jury trial is demanded in complaint		Demand \$	
Other Relief Sought			



B1040 (FORM 1040) (12/15)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR Telexfree, LLC, Telexfree, Inc., and Telexfree Financial, Inc.		BANKRUPTCY CASE NO. 14-40987-MSH
DISTRICT IN WHICH CASE IS PENDING District of Massachusetts	DIVISION OFFICE Eastern	NAME OF JUDGE Hoffman
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF) 		
Andrew G. Lizotte, Esq.		
DATE April 4, 2016	PRINT NAME OF ATTORNEY (OR PLAINTIFF) Andrew G. Lizotte, Esq.	

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

TELEXFREE, LLC,
TELEXFREE, INC. and
TELEXFREE FINANCIAL, INC.,

Debtors.

STEPHEN DARR, AS HE IS THE TRUSTEE
OF THE CHAPTER 11 ESTATES OF EACH
OF THE DEBTORS,

Plaintiff,

v.

OPT 3 SOLUTIONS, INC., JAY BORROMEI,

Defendants.

Chapter 11 Cases

14-40987-MSH

14-40988-MSH

14-40989-MSH

Jointly Administered

Adversary Proceeding

No. 16-

COMPLAINT

Introduction

Stephen Darr is the duly appointed and acting trustee (the "Trustee") of the Chapter 11 bankruptcy estates ("Estates") of TelexFree, Inc. ("Inc."), TelexFree, LLC ("LLC") and TelexFree Financial, Inc. ("Financial" and, collectively, the "Debtors"). As Trustee, Mr. Darr brings this adversary proceeding to recover payments made to the Defendants within two years of the bankruptcy filings as fraudulent transfers and to recover payments made within one year of the bankruptcy filings as insider preferential transfers. The Trustee also seeks damages for the Defendants' aiding and abetting of the commission of tortious conduct.

Parties and Jurisdiction

1. The Trustee, who is the duly appointed Chapter 11 trustee of the Debtors, has a principal place of business in Boston, Massachusetts.
2. The Defendant, Opt 3 Solutions, Inc., is upon information and belief a corporation with a place of business at 120 Vantis, Suite 300, Aliso Viejo, CA 92656.
3. The Defendant, Jay Borrromei, is an individual who, upon information and belief, resides at 23691 Blue Fin Cv, Laguna Niguel, CA 92677-1640.
4. This adversary proceeding is brought pursuant to §§ 547, 548, 550 and 551 of Title 11 of the United States Code for the avoidance and recovery of fraudulent conveyances and preferential transfers.
5. This Court has jurisdiction over the adversary proceeding pursuant to 28 U.S.C. § 1334.
6. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A)(F)(H) and (O).
7. Venue in this district is proper under 28 U.S.C. § 1409.

Statement of Facts

8. This case involves a massive Ponzi and pyramid scheme operated by the Debtors, which involved more than a million participants (“Participants”) from multiple countries. The Debtors ostensibly operated a “multi-level marketing” company with its headquarters in Marlborough, Massachusetts. It represented itself as being in the business of selling telephone service plans that use “voice over internet protocol” (“VoIP”) technology. The sale of VoIP, however, constituted only a minor portion of their business; the Debtors’ actual business was the recruitment of Participants.

9. From April 2012 to April 2014, individuals throughout the world, including many Participants of the Brazilian and Dominican immigrant communities in the United States, purchased membership plans with a transaction value of approximately \$3,000,000,000. The memberships promised substantial returns – 200% per year or more – for becoming “promoters” of the business. The Debtors promised to pay Participants for placing ads on obscure classified ad sites on the internet and recruiting other Participants to do the same. The membership fees from Participants constituted approximately ninety-nine percent (99%) of the monies taken in by the Debtors.

10. In the spring of 2012, Ympactus Comercial Ltda. (“Ympactus”), a Brazilian affiliate of the Debtors, began operating a substantially similar scheme in Brazil. In June 2013, the Brazilian authorities shut down the operations of Ympactus as an illegal pyramid scheme.

11. In early 2013, the Debtors retained Opt 3 and Borrromei to provide website development and programming assistance, and compensation and network marketing advice.

12. Borrromei was intimately involved in the Debtors’ affairs from early 2013 through the filing of the bankruptcy petitions in April 2014 and thereafter.

13. Borrromei regularly engaged in communications directly with the Debtors’ principals, Carlos Wanzeler, James Merrill, and Carlos Costa (the “Principals”) and traveled in the United States and Brazil to assist in the operations of both the Debtors and Ympactus.

14. Borrromei reviewed video presentations by the Principals on the TelexFree compensation scheme and provided advice and assistance in refining and broadcasting the videos.

15. Borromei was a key figure in the implementation of the Debtors' Ponzi scheme. Borromei provided advice and assistance to the Principals on structuring compensation plans and systems to track Participant activity.

16. Borromei was aware of the Ympactus regulatory action at the time of his retention and conferred extensively with the Principals regarding the impact of this action upon the Debtors' activities.

17. Borromei exercised substantial control over the Debtors. Among other things, Borromei directly authorized the payment of certain TelexFree expenses.

18. Opt 3 and Borromei were at all relevant times insiders of the Debtors.

19. On April 13, 2014 (the "Petition Date"), the Debtors filed voluntary Chapter 11 petitions with the United States Bankruptcy Court for the District of Nevada.

20. By order dated May 6, 2014, the Nevada Bankruptcy Court approved a motion to change venue filed by the Securities and Exchange Commission. The cases were transferred to this Court on May 9, 2014.

21. On May 30, 2014, this Court approved the motion of the Office of the United States Trustee to appoint a Chapter 11 trustee, and the Trustee was appointed on June 6, 2014.

22. On November 25, 2015, the Court, on motion by the Trustee and after notice, entered an Order, as amended on December 21, 2015, that the Debtors were engaged in a Ponzi scheme and that this ruling was the law of the case in each of the jointly administered cases.

23. During the two years preceding the Petition Date, the Debtors made the payments to the Defendant Opt 3 (the "Two Year Transfers") as set forth on Exhibit "A" hereto.

24. During the one year preceding the Petition Date, the Debtors made the payments to Opt 3 (the "One Year Transfers") as set forth on Exhibit "B" hereto.

25. Mr. Borromei, as the principal of Opt 3, was the beneficiary of the foregoing transfers. Upon information and belief, Mr. Borromei was the mediate transferee of the payments made to Opt 3.

COUNT ONE

Fraudulent Transfer -- Constructive – 11 U.S.C. §§ 548, 550 and 551

(Two Year Transfers)

26. The Trustee realleges and repeats the allegations contained in the foregoing paragraphs and by reference incorporates them herein.

27. Each of the Two Year Transfers constitutes a “transfer,” as that term is defined in 11 U.S.C. § 548, of an asset or interest in an asset of the Debtors.

28. The Two Year Transfers were made within two years of the Petition Date.

29. Each of the Two Year Transfers was made while the Debtors were insolvent.

30. Each of the Two Year Transfers was made for less than reasonably equivalent value.

31. The Two Year Transfers constitute fraudulent transfers avoidable by the Trustee pursuant to § 548(a)(1)(B) of the Bankruptcy Code and recoverable from the Defendants pursuant to §§ 550 and 551 of the Bankruptcy Code.

32. As a result of the foregoing, the Trustee is entitled to a judgment against the Defendants Opt 3 and Borromei: (a) avoiding and preserving the Two Year Transfers, (b) directing that the Two Year Transfers be set aside, and (c) recovering the Two Year Transfers in the amount of \$939,079.50 from the Defendants for the benefit of the Estates.

COUNT TWO

Fraudulent Transfer – Actual Intent – 11 U.S.C. §§ 548, 550 and 551

(Two Year Transfers)

33. The Trustee realleges and repeats the allegations contained in the foregoing paragraphs and by reference incorporates them herein.

34. Each of the Two Year Transfers was made within two years of the Petition Date.

35. Each of the Two Year Transfers was made with the actual intent to hinder, delay or defraud some or all of the Debtors' then existing and/or future creditors.

36. The Two Year Transfers constitute a fraudulent transfer avoidable by the Trustee pursuant to 11 U.S.C. § 548(a)(1)(A) and recoverable from the Defendants pursuant to §§550 and 551 of the Bankruptcy Code.

37. As a result of the foregoing, the Trustee is entitled to a judgment against the Defendants Opt 3 and Borromei: (a) avoiding and preserving the Two Year Transfers, (b) directing that the Two Year Transfers be set aside, and (c) recovering the amount of \$939,079.50 from the Defendants for the benefit of the Estates.

COUNT THREE

Preferences – 11 U.S.C. §§ 547, 550 and 551

(One Year Transfers)

38. The Trustee realleges and repeats the allegations contained in the foregoing paragraphs and by reference incorporates them herein.

39. Within one year of the Petition Date, the Debtors paid the One Year Transfers to the Defendants.

40. Each One Year Transfer was made:

(a) to or for the benefit of the Defendants, who claims to be a creditor at the time of the Transfers;

(b) for or on account of an antecedent debt owed by the Debtors before such transfer was made;

- (c) while the Debtors were insolvent;
- (d) within one year of the Petition Date
- (e) to an insider; and
- (f) enabling the Defendants to receive more than the Defendants would receive if the

cases were under Chapter 7, the One Year Transfer was not made, and the Defendants received payment of such debt to the extent provided by the provisions of Title 11 of the United States Code.

41. The foregoing One Year Transfers constitute preferential transfers avoidable by the Trustee pursuant to 11 U.S.C. § 547 and recoverable from the Defendants pursuant to §§550 and 551 of the Bankruptcy Code.

42. As a result of the foregoing, the Trustee is entitled to a judgment against the Defendants Opt 3 and Borrromei: (a) avoiding and preserving the preferential transfers, (b) directing that the preferential transfers be set aside, and (c) recovering the amount of \$882,829.50 from the Defendants for the benefit of the Estates.

COUNT FOUR

Aiding and Abetting Commission of Tortious Conduct

43. The Trustee realleges and repeats the allegations contained in the foregoing paragraphs and by reference incorporates them herein.

44. The Defendants provided substantial assistance or encouragement to the Principals in devising and implementing the Ponzi scheme and did so with unlawful intent and knowledge that such parties were perpetrating an unlawful Ponzi scheme.

45. The Defendants rendered this substantial assistance despite their knowledge that TelexFree's operations constituted an unlawful, unfair, deceptive, and unsustainable Ponzi scheme and financial fraud.

46. Such substantial assistance included participation in establishing the TelexFree compensation scheme and involvement in establishing systems to track the scheme's activity.

47. As a direct result of the perpetration of the TelexFree Ponzi scheme, and the Defendants' substantial assistance in connection therewith, TelexFree incurred liability to Participants for losses incurred in the Ponzi scheme of upwards of \$1,000,000,000 or more.

WHEREFORE, Stephen Darr as he is the Trustee of the Chapter 11 Estates of the Debtors respectfully prays that the Court enter judgment for him against the Defendants as follows:

1. On Count One: (a) avoiding and preserving the Two Year Transfers as constructive fraudulent transfers, (b) directing the Two Year Transfers be set aside and (c) recovering \$939,079.50 from the Defendants Opt 3 and Jay Borromei for the benefit of the Estates;

2. On Count Two: (a) avoiding and preserving the Two Year Transfers as actual fraudulent transfers; (b) directing the Two Year Transfers be set aside; and (c) recovering \$939,079.50 from the Defendants Opt 3 and Jay Borromei for the benefit of the Estates;

3. On Count Three: (a) avoiding the payments received by the Defendants Opt 3 and Jay Borromei as preferential payments, and (b) recovering \$882,829.50 from the Defendants Opt 3 and Jay Borromei for the benefit of the Estates;

4. On Count Four, finding that the Defendants aided and abetted the commission of tortious conduct by the Principals and awarding damages to the Trustee; and

5. And for such other and further relief as this Court deems just and proper.

STEPHEN DARR AS HE IS THE
TRUSTEE OF THE CHAPTER 11
ESTATES OF EACH OF THE DEBTORS
By his attorneys,

/s/ Andrew G. Lizotte
Charles R. Bennett, Jr. (BBO #037380)
Andrew G. Lizotte (BBO #559609)
Murphy & King, Professional Corporation
One Beacon Street
Boston, MA 02108
(617) 423-0400
ALizotte@murphyking.com

Dated: April 4, 2016
705153

EXHIBIT A

2 Years
4/13/12 - 4/13/14

In re: TelexFree, LLC, et al.
Payments to Opt3 Solutions, Inc.

Account	Date	Transaction Type	Num	Name	Amount	Entity
Bank of America 7408	1/31/2013	Check		Opt 3 Solutions, Inc.	-5,625.00	Inc.
Bank of America 7408	1/31/2013	Check		Opt 3 Solutions, Inc.	-5,625.00	Inc.
100107 Citizens Bank	2/21/2013	Check		Opt 3 Solutions, Inc.	-11,250.00	LLC
Bank of America 7408	3/15/2013	Check		Opt 3 Solutions, Inc.	-22,500.00	Inc.
100107 Citizens Bank	3/15/2013	Check		Opt 3 Solutions, Inc.	-11,250.00	LLC
100107 Citizens Bank	4/24/2013	Check		Opt Three Solutions, Inc.	-11,250.00	LLC
100107 Citizens Bank	5/3/2013	Check		Opt 3 Solutions, Inc.	-6,622.00	LLC
100107 Citizens Bank	5/13/2013	Check		Opt 3 Solutions, Inc.	-12,560.27	LLC
100107 Citizens Bank	5/20/2013	Check		Opt 3 Solutions, Inc.	-11,250.00	LLC
100107 Citizens Bank	6/26/2013	Check		Opt 3 Solutions, Inc.	-16,030.92	LLC
100107 Citizens Bank	7/3/2013	Check		Opt 3 Solutions, Inc.	-17,250.00	LLC
100107 Citizens Bank	7/18/2013	Check		Opt 3 Solutions, Inc.	-23,250.00	LLC
100107 Citizens Bank	8/1/2013	Check		Opt 3 Solutions, Inc.	-32,355.00	LLC
100109 Fidelity Bank 3842	8/22/2013	Check		Opt 3 Solutions, Inc.	-17,250.00	LLC
100109 Fidelity Bank 3842	8/30/2013	Check		Opt 3 Solutions, Inc.	-25,322.50	LLC
100109 Fidelity Bank 3842	9/19/2013	Check		Opt 3 Solutions, Inc.	-23,844.80	LLC
100109 Fidelity Bank 3842	9/30/2013	Check		Opt 3 Solutions, Inc.	-18,937.80	LLC
100109 Fidelity Bank 3842	10/16/2013	Check		Opt 3 Solutions, Inc.	-33,749.00	LLC
100109 Fidelity Bank 3842	10/29/2013	Check		Opt 3 Solutions, Inc.	-35,258.08	LLC
100109 Fidelity Bank 3842	11/19/2013	Check		Opt 3 Solutions, Inc.	-55,296.23	LLC
100109 Fidelity Bank 3842	12/3/2013	Check		Opt 3 Solutions, Inc.	-50,409.00	LLC
100109 Fidelity Bank 3842	12/17/2013	Check		Opt 3 Solutions, Inc.	-84,147.20	LLC
100109 Fidelity Bank 3842	12/31/2013	Check		Opt 3 Solutions, Inc.	-58,535.00	LLC
100108 Wells Fargo 0272	1/30/2014	Check	1034	Opt 3 Solutions, Inc.	-57,200.00	LLC
100115 Wells Fargo 6715	2/11/2014	Check		Opt 3 Solutions, Inc.	-72,205.60	LLC
100114 Wells Fargo 8506	3/6/2014	Check		Opt 3 Solutions, Inc.	-73,510.59	LLC
PNC Bank	3/21/2014	Check	3131	Opt3	-52,146.60	Financial
PNC Bank	4/8/2014	Check		Opt3	-94,448.91	Financial

-939,079.50

EXHIBIT B

1 Year
4/13/13 - 4/13/14

In re: TelexFree, LLC, et al.
Payments to Opt3 Solutions, Inc.

Account	Date	Transaction Type	Num	Name	Amount	Entity
100107 Citizens Bank	4/24/2013	Check		Opt Three Solutions, Inc.	-11,250.00	LLC
100107 Citizens Bank	5/3/2013	Check		Opt 3 Solutions, Inc.	-6,622.00	LLC
100107 Citizens Bank	5/13/2013	Check		Opt 3 Solutions, Inc.	-12,560.27	LLC
100107 Citizens Bank	5/20/2013	Check		Opt 3 Solutions, Inc.	-11,250.00	LLC
100107 Citizens Bank	6/26/2013	Check		Opt 3 Solutions, Inc.	-16,030.92	LLC
100107 Citizens Bank	7/3/2013	Check		Opt 3 Solutions, Inc.	-17,250.00	LLC
100107 Citizens Bank	7/18/2013	Check		Opt 3 Solutions, Inc.	-23,250.00	LLC
100107 Citizens Bank	8/1/2013	Check		Opt 3 Solutions, Inc.	-32,355.00	LLC
100109 Fidelity Bank 3842	8/22/2013	Check		Opt 3 Solutions, Inc.	-17,250.00	LLC
100109 Fidelity Bank 3842	8/30/2013	Check		Opt 3 Solutions, Inc.	-25,322.50	LLC
100109 Fidelity Bank 3842	9/19/2013	Check		Opt 3 Solutions, Inc.	-23,844.80	LLC
100109 Fidelity Bank 3842	9/30/2013	Check		Opt 3 Solutions, Inc.	-18,937.80	LLC
100109 Fidelity Bank 3842	10/16/2013	Check		Opt 3 Solutions, Inc.	-33,749.00	LLC
100109 Fidelity Bank 3842	10/29/2013	Check		Opt 3 Solutions, Inc.	-35,258.08	LLC
100109 Fidelity Bank 3842	11/19/2013	Check		Opt 3 Solutions, Inc.	-55,296.23	LLC
100109 Fidelity Bank 3842	12/3/2013	Check		Opt 3 Solutions, Inc.	-50,409.00	LLC
100109 Fidelity Bank 3842	12/17/2013	Check		Opt 3 Solutions, Inc.	-84,147.20	LLC
100109 Fidelity Bank 3842	12/31/2013	Check		Opt 3 Solutions, Inc.	-58,535.00	LLC
100108 Wells Fargo 0272	1/30/2014	Check	1034	Opt 3 Solutions, Inc.	-57,200.00	LLC
100115 Wells Fargo 6715	2/11/2014	Check		Opt 3 Solutions, Inc.	-72,205.60	LLC
100114 Wells Fargo 8506	3/6/2014	Check		Opt 3 Solutions, Inc.	-73,510.59	LLC
PNC Bank	3/21/2014	Check	3131	Opt3	-52,146.60	Financial
PNC Bank	4/8/2014	Check		Opt3	-94,448.91	Financial

-882,829.50