

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF RICHLAND

FOR THE FIFTH JUDICIAL CIRCUIT

Raymond G. Farmer, as Director of the South  
Carolina Department of Insurance,

Petitioner,

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

C.A. No. 2014-CP-40-5987

**ORDER APPROVING PRO-FORMA  
CLOSING FINAL ACCOUNTING,  
ADMINISTRATIVE EXPENSES, FINAL  
DISPOSITION OF CLAIMS,  
DISTRIBUTION OF ASSETS,  
DESTRUCTION OF RECORDS,  
DISCHARGE OF SPECIAL REFEREE,  
DISCHARGE OF LIQUIDATOR AND  
CLOSING OF LIQUIDATION ESTATE**

This matter comes before the Court pursuant to the South Carolina Insurers Supervision, Rehabilitation and Liquidation Act, S.C. Code Ann. §§ 38-27-10 *et seq.* (2015). Petitioner has filed an Application seeking an order approving the pro forma closing accounting, which was filed with the Application and which includes the payment of administrative expenses and the proposed distribution of the remaining assets to claimants in Class 2 pursuant to S.C. Code Ann. § 38-27-610 (2015). Pursuant to S.C. Code Ann. § 38-27-650(a) (2015), Petitioner also seeks his discharge as Liquidator as well as the discharge of the Special Deputy Liquidator and the Special Referee for claims appointed in this matter by previous order of this Court. Finally, Petitioner seeks an order closing the estate of First Keystone Risk Retention Group, Inc. (First Keystone) and providing for the destruction and maintenance of records and termination of these proceedings pursuant to S.C. Code Ann. §§ 38-27-650 and -670 (2015). Based upon the pleadings, filings orders and other submissions in the file, including the Application and exhibits thereto, I find the following:

1. First Keystone was placed in liquidation by Order of the supervising court (Liquidation Order) on October 21, 2014. On that same date, the supervising court approved the appointment by the Director of the South Carolina Department of Insurance, acting in his capacity as Liquidator for First Keystone, of Michael J. FitzGibbons as Special Deputy Liquidator pursuant to S.C. Code Ann. § 38-27-400, with all the powers of the Liquidator granted by and set forth in that Code section.

2. Consistent with the Liquidation Order, the deadline for filing claims was set for February 28, 2015; and, pursuant to S.C. Code Ann. § 38-27-580(a) (2015), all claims received have been adjudicated and each claimant has been given notice by first class mail of the action taken and notice of the time period to object to the Special Deputy Liquidator's determination of the claim.

3. All claim determinations by the Special Deputy Liquidator have been accepted by the parties or adjudicated by the court-appointed Special Referee whose report and recommendation was approved by the supervising court, except that if the Special Referee's report and recommendation was subject to an objection, either the supervising court upheld the Special Referee's recommendation, with the time for appeal now expired, or the claim was subject to a subsequent settlement approved by the supervising court.

4. The priority of distribution of claims from an insolvent insurer's estate is set forth in S.C. Code Ann. § 38-27-610 (2015). This Code section requires that every claim in each class must be paid in full before members of the next class receive payment.

5. The financial statement and exhibits attached to the Application of the Liquidator reflect that the distribution of the Class 1 administrative expenses is \$394,033.

6. The remaining cash available for distribution to Class 2 claimants amounts to

\$2,635,843 and the Class 2 approved claims total amounts to \$4,497,817. Individual distributions as set forth in Exhibit C to the Application are subject to final adjustment pursuant to S.C. Code Ann. § 38-27-610(2) (2015) for recoveries from other sources that have not yet been reported. *See also* S.C. Code Ann. § 38-27-550(a)(3) & (c) (2015) (proof of claim must include payments made on claim and receiver may require additional information).

7. These amounts, as set forth on Exhibit A to the Application, reflect that there are sufficient remaining assets contained in the liquidation estate of First Keystone to pay a pro rata share of approximately fifty-nine percent (59%) on each Class 2 claim.

8. Upon payment of the approximately 59% pro rata distribution to Class 2 claimants, all funds will be exhausted and there will not be any remaining funds to pay claims with a priority subordinate to Class 2.

9. In light of the above findings and conclusions,

**IT IS THEREFORE ORDERED THAT**

1. The pro forma closing accounting and administrative expenses are approved and that all the claim determinations by the Special Deputy Liquidator, Special Referee and the supervising court are hereby confirmed and the proposed distribution of the remaining assets by the Liquidator/Special Deputy Liquidator as set forth in the Application and exhibits attached thereto is proper and is hereby approved.

2. The Special Deputy Liquidator is hereby authorized to distribute the remaining assets as set forth in the Special Deputy Liquidator's Application and attached exhibits.

3. Gerald M. Finkel as the claims Special Referee is hereby discharged and he and his agents, successors and employees are forever terminated from any liability whatsoever arising out of or in connection with this proceeding.

4. Following Final Distribution of Assets and filing of the final tax return. The Liquidator shall dispose of the insurer's records, except that the insurer's financial record books for five years (2014-2019) and a copy of a list of paid claims shall be retained by the South Carolina Department of Insurance for one year from the date of the closing of the estate.

5. In the event there are any remaining unclaimed funds after a reasonable attempt is made by the Petitioner to distribute all of the funds of the Liquidation Estate as authorized by this Order, the Petitioner is authorized and directed to transfer such remaining funds to the Treasurer of the State of South Carolina pursuant to S.C. Code Ann. § 38-27-640 (2015) to be disposed of pursuant to S.C. Code Ann. § 27-19-220.

6. The Court recognizes that some of the costs set forth in Exhibit B are estimates and subject to change. The Liquidator shall file with this Court a Final Accounting which sets for the actual final administrative costs and actual final distribution to Class 2 claimants, together with all cash receipts and disbursements from the inception of the receivership.

7. Subject to the terms and conditions set forth in paragraph 9 below and the receipt of the Final Accounting as set forth in Paragraph 6 above, the Liquidator, Special Deputy Liquidator and their attorneys, accountants, assistants, representatives, contractors and agents are discharged from their responsibilities pursuant to these proceedings and all liability whatsoever on their part arising out of or in connection with this proceeding is forever terminated.

8. All persons shall continue to be enjoined from commencing or prosecuting, without leave of this Court, any action or proceeding against the discharged persons in connection with or arising out of their service to the Court in the liquidation proceedings, and the Court shall retain jurisdiction for the purpose of enforcing this injunction.

9. These proceedings and the Liquidation Estate shall be closed as of the date of the

filing of the final closing accounting and that date shall become the date of the discharge of the Liquidator, Special Deputy Liquidator and their attorneys, accountants, assistants, representatives, contractors and agents.

**AND IT IS SO ORDERED.**

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Jocelyn Newman  
Chief Administrative Judge  
Fifth Judicial Circuit

October \_\_\_\_, 2019  
Columbia. South Carolina



Richland Common Pleas

**Case Caption:** Raymond G Farmer , plaintiff, et al vs First Keystone Risk

**Case Number:** 2014CP4005987

**Type:** Order/Other

So Ordered

Jocelyn Newman, Chief Judge for Administrative  
Purposes, Court of Common Pleas, 5th Judicial  
Circuit

**STATE OF SOUTH CAROLINA**  
**COUNTY OF RICHLAND**

**IN THE COURT OF COMMON PLEAS**  
**FOR THE FIFTH JUDICIAL CIRCUIT**

Raymond G. Farmer, as Director of the South  
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Petitioner,

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

C.A. No. 2014-CP-40-5987

**CERTIFICATE OF SERVICE**

I hereby certify that one copy each of the Liquidator's Application to Pay Final Distributions, Close Estate and for Discharge and the proposed Order Approving Pro-Forma Closing Final Accounting, Administrative Expenses, Final Disposition of Claims, Distribution of Assets, Destruction of Records, Discharge of Special Referee, Discharge of Liquidator and Closing Of Liquidation Estate has been served upon the following persons, by First Class U.S. Mail, postage prepaid, this 3rd day of October, 2019, addressed as follows:

Mr. Todd Rinaldo  
c/o Tiana Gimbrone, Esq.  
Rinaldo and Rinaldo Assocs., LLC  
60 Walnut Ave Suite 150  
Clark, NJ 07066

Tiana Gimbrone, Esq.  
Rinaldo and Rinaldo Assocs., LLC  
60 Walnut Ave Suite 150  
Clark, NJ 07066

Respectfully submitted,

October 3, 2019

s/Geoffrey R. Bonham  
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One of the Attorneys for Petitioner



STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF RICHLAND

FOR THE FIFTH JUDICIAL CIRCUIT

Raymond G. Farmer, as Director of the South  
Carolina Department of Insurance,

C.A. No. 2014-CP-40-5987

Petitioner,

**LIQUIDATOR'S APPLICATION  
TO PAY FINAL DISTRIBUTIONS,  
CLOSE ESTATE  
AND FOR DISCHARGE**

vs.

First Keystone Risk Retention Group, Inc.,

Respondent.

Raymond G. Farmer, Liquidator ("Liquidator") of First Keystone Risk Retention Group, Inc. (First Keystone), files herewith his Application to terminate First Keystone's liquidation proceedings and for discharge. This Application is made pursuant to the South Carolina Insurers Supervision, Rehabilitation and Liquidation Act, S.C. Code Ann. §§ 38-27-10 *et seq.* (the "Act"), specifically, S.C. Code Ann. § 38-27-650(a) (2015), which directs that the Liquidator shall apply to the Court for termination of the liquidation proceedings and for discharge when all assets justifying the expense of collection and distribution have been collected and distributed. In support of his Application, the Liquidator shows the Court as follows:

**LIQUIDATION ORDER**

1. On October 21, 2014, the Court determined that First Keystone was insolvent and entered an Order Commencing Liquidation Proceedings & Granting an Injunction & Automatic Stay of Proceedings ("Liquidation Order").

**ACTIONS TAKEN IN LIQUIDATION**

2. Pursuant to the Liquidation Order and the Liquidation Act, the Liquidator took possession of the assets of First Keystone and administered them under the supervision of the Court. In particular, and without limitation:

a. The Liquidator gave or caused to be given notice of the Liquidation Order pursuant to S.C. Code Ann. § 38-27-410 (2015). The notice required all claimants to file with the Liquidator their claims together with proper proofs thereof pursuant to S.C. Code Ann. § 38-27-550(a) (2015) not later than 5:00 p.m., MST, on February 28, 2015.

b. The Liquidator identified and collected and liquidated all assets of First Keystone which in the Liquidator's judgment justified the expense of collection and liquidation.

c. The Liquidator established a claims procedure meeting the requirements of the Act, specifically S.C. Code Ann. § 38-27-550 (2015), and adjudicated and classified all claims filed thereunder.

d. The Liquidator's claim recommendations on undisputed claims were submitted to the Court for approval pursuant to S.C. Code Ann. § 38-27-620 (2015) at various times throughout the liquidation proceedings. Disputed claims were submitted to the Court under S.C. Code Ann § 38-27-580 (2015) and the Court's Procedures Governing Referee's Participation in Claim Administration, also at various times throughout the liquidation proceedings. All claims are now subject to final orders of the Court.

e. All claims filed before July 22, 2019 have been resolved, as evidenced by the affidavits of the Special Deputy Liquidator previously filed in this matter on December 28, 2016, July 19, 2017, December 4, 2017, May 23, 2019 and July 22, 2019.

f. The Liquidator has paid the administrative costs and expenses of First Keystone's liquidation (Class 1 claims) in the ordinary course of its operations. The Liquidator has arranged for the final distribution of all assets except those held for the payment of final administrative expenses and unclaimed property, subject to the Court's approval herein and the finalization of administrative costs to close.

### **BARRING OF LATE CLAIMS**

3. In order to prevent prejudice to the proceedings or the waste of assets, and to ensure the orderly administration and timely closing of the liquidation estate, the Court entered an Order on December 5, 2017 providing that any claim filed on or after December 4, 2017 is deemed denied and is forever barred.

### **PRO FORMA CLOSING ACCOUNTING**

4. Pursuant to S.C. Code Ann. § 38-27-370(E) (2015), the Liquidator has filed annual financial reports for First Keystone, starting with a list of assets as of December 31, 2014, and ending with financial statements for the year ended December 31, 2018.

5. The Liquidator has prepared a pro forma closing accounting for First Keystone for the period ending on September 30, 2019 which, subject to Court approval, the Liquidator has set as the effective date of the termination of First Keystone's liquidation proceedings. A true and correct copy of the pro forma closing accounting is attached hereto as **Exhibit A** and incorporated herein by reference.

6. A final closing accounting will be filed with the Court as soon as practicable following the final claim distributions and completion of the necessary post-termination matters,

such as completion and filing of the final federal income tax return, deposit of unclaimed property, if any, and the finalization of the closing accounting.

### **UNCLAIMED FUNDS**

7. Unclaimed funds may arise if final claim distributions are not cashed. Pursuant to S.C. Code Ann. § 38-27-640 (2015), the Liquidator is prepared to deposit all unclaimed funds with the Treasurer for the State of South Carolina to be disposed of pursuant to S.C. Code Ann. § 27-19-220.

### **FINAL FEES AND EXPENSES**

8. To permit the closing of First Keystone's liquidation proceedings, it is necessary to pay the final fees and expenses incurred in terminating the liquidation, including fees and expenses which are already accrued and those which relate to matters which may occur after the liquidation proceedings are closed. These final fees and expenses are set forth in the Liquidator's pro forma closing accounting (Exhibit A) and are projected to total \$394,033.

9. Included in the final fees and expenses are occupancy and overhead expenses, tax return preparation and related administrative expenses, and the final fees and expenses of the various service providers to the Liquidator, all as detailed in **Exhibit B** attached hereto and incorporated herein by reference.

a. The proposed payments to various service providers, including the Special Deputy Liquidator, and others are for professional and administrative services which may be required following the termination of First Keystone's liquidation proceedings. The Liquidator intends to make lump sum final payments to each as specified in Exhibit B.

b. In consideration of such payments, which would be nonrefundable, each vendor would render all required future services to the First Keystone liquidation estate, regardless of whether the amounts which would otherwise be due to them under their current compensation arrangements are more or less than the amounts shown in Exhibit B. The lump sum payments have been determined based on amounts previously paid to the service providers and the assumption that post-termination services would be required for an indefinite period following the termination of these proceedings.

10. The Liquidator applies for approval to pay the final fees and expenses set forth in Exhibits A and B without further order of the Court as final Class 1 administrative expenses incident to the termination of First Keystone's liquidation proceedings.

#### **FINAL INCOME TAX RETURN**

11. Also included in the pro forma closing accounting (Exhibit A) is a provision for estimated costs related to the preparation of the 2018 and 2019 federal and state income tax returns in the amount of \$10,000. The Liquidator does not anticipate that any taxes will be due.

#### **FINAL CLAIM DISTRIBUTIONS**

12. Pursuant to S.C. Code Ann. § 38-27-630 (2015), the Liquidator may pay distributions under the direction of the Court in a manner that will assure the proper recognition of priorities and a reasonable balance between the expeditious completion of the liquidation and the protection of unliquidated and undetermined claims.

13. Proposed distributions of First Keystone's general assets as set forth herein include amounts sufficient to pay, in pro rata shares, approved Class 2 (claims under policies). The Liquidator projects that the total distribution on approved claim amounts in Class 2, distributions

for which approval is sought herein, will approximate fifty-nine percent (59%) of the total amount approved. There are no assets available to pay any claims in classes subordinate to Class 2. *See* S.C. Code Ann. § 38-27-610 (2015) (“Every claim in each class must be paid in full or adequate funds retained for the payment before the members of the next class receive any payment.”).

14. Pursuant to S.C. Code Ann. § 38-27-610(2) (2015), final Class 2 distributions will include adjustments for any payments received on a claim or a portion thereof by way of indemnification provided by other benefits or advantages received by the claimant. *See also* S.C. Code Ann. § 38-27-550(a)(3) & (c) (2015) (proof of claim to include payment made on claim and receiver may require supplemental information on claims). In addition to being mandated by Section 38-27-610(2), subordinating policy claims or portions thereof on which recovery has been secured from another source serves the important public policy of encouraging claimants to seek recovery from other sources where possible, conserving the insolvent insurer’s limited assets for policy claimants who have nowhere else to turn. *E.g., Ario v. Reliance ins. Co.*, 980 A.2d 588 (Pa. 2009).

15. The Liquidator seeks Court approval to pay from its general assets a first and final distribution to Class 2 claims under policies, as defined in S.C. Code Ann. 38-27-610(2) (2015) and as set forth in **Exhibit C**.<sup>1</sup> The aggregate amount of the distribution for which approval is requested is all assets remaining after payment of unclaimed property, if any, and payment of final administrative costs to close as set forth in Exhibit A. The Class 1 pro forma administrative costs

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<sup>1</sup> Actual individual final distributions may differ from the amounts in Exhibit C as additional adjustments are made pursuant to S.C. Code Ann. § 38-27-610(2) in response to any recoveries made or reported by Class 2 claimants subsequent to this Application.

and final Class 2 distribution amounts as of September 30, 2019, the proposed closing date of First Keystone's liquidation proceedings, are set forth in Exhibit A. The projected total dollar amount of the final Class 2 claim distribution for which approval is sought is \$2,635,843.

16. Some of the administrative costs to close are not finally known at this time. Those costs will be finalized when vendor invoices are received. The final administrative costs will affect the actual amount of this final Class 2 claim distribution.

### **DISCHARGE OF LIQUIDATOR**

17. The Liquidator applies to the Court for the discharge and release of the Liquidator, Special Deputy Liquidator, and the employees, contractors, agents, assistants, clerks, attorneys, accountants and representatives providing services in the liquidation of First Keystone ("discharged persons"). The discharged persons shall be released from any and all further liability to First Keystone, its creditors, claimants, shareholders, policyholders, and the liquidation estate. Until filing of the final closing accounting satisfactory to the Court, the Liquidator shall, to the extent of assets remaining in First Keystone's liquidation estate, retain the fiduciary and statutory obligation to escheat assets, pay final administrative costs and make final distributions, as anticipated in the pro forma closing accounting, and shall retain the fiduciary and statutory obligation to complete all post-closing tasks necessary or advisable to complete the liquidation of First Keystone.

18. Final discharge of the discharged persons shall be effective upon filing of the final closing accounting with the Court.

19. The Liquidator also seeks an injunction against any and all persons from commencing or prosecuting, without leave of this Court, any action or proceeding against the

discharged persons in connection with or arising out of their service to the Court in these liquidation proceedings, with the Court retaining jurisdiction for the purpose of enforcing its injunction. The injunction would be an extension of the injunction contained in the Liquidation Order.

### **DISCHARGE OF CLAIMS REFEREE**

20. All matters requiring the participation of the Special Referee have been resolved. The Liquidator further applies to the Court for the discharge of Gerald M. Finkel as the court-appointed claims referee herein, and respectfully requests that the Special Referee also be released from any and all further liability to First Keystone, its creditors, claimants, shareholders, policyholders, and the liquidation estate, and that any and all persons be enjoined from commencing or prosecuting, without leave of this Court, any action or proceeding against him in connection with or arising out of his service to the Court in these liquidation proceedings, such being an extension of the injunction contained in the Liquidation Order, with the Court retaining jurisdiction for the purpose of enforcing its injunction.

### **BOOKS AND RECORDS**

21. The Liquidator does not anticipate that he will have any further use for the books and records of First Keystone following the post-closing tasks necessary to complete the liquidation, including final distributions, the filing of the final tax return, and the filing of the final closing accounting. Accordingly, pursuant to S.C. Code Ann 38-27-670 (2015), the Liquidator applies for approval from the Court to dispose of the insurer's records, except that five (5) years (2014-2019) of financial records, as well as a copy of a list of paid claims, shall be retained by the Department of Insurance for one year from the date of the closing of the estate.



WHEREFORE, the Liquidator respectfully prays this Court for an Order permitting final distributions, terminating First Keystone's liquidation proceedings, providing for the post-closing tasks described herein, and for discharge.

October 3, 2019

Respectfully submitted,

s/Geoffrey R. Bonham  
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One of the Attorneys for the Liquidator

**First Keystone Insurance Company, an RRG**  
**Pro Forma Closing Accounting**  
**Pro Forma at 9-30-19**

	Balance Sheet	Class 1 Distribution	Remaining Net	Class 2 Distribution	Unpaid Liabilities
<b>Assets</b>					
Cash	3,025,311	394,033	2,631,278	2,631,278	-
Other	4,565		4,565	4,565	-
<b>Total Assets</b>	<b>3,029,876</b>	<b>394,033</b>	<b>2,635,843</b>	<b>2,635,843</b>	<b>-</b>
<b>Liabilities</b>					
<b>Class 1:</b>					
Post Liquidation Escheat	-	-			
Accrued Administrative Costs	321,406	321,406			
Projected Administrative Costs	72,628	72,628			
<b>Total Class 1</b>	<b>394,033</b>	<b>394,033</b>			
<b>Class 2:</b>					
Claims	4,497,817	-	4,497,817	4,497,817	1,861,974
Other Subordinate Liabilities	4,399,199		4,399,199	-	4,399,199
<b>Total Liabilities</b>	<b>9,291,049</b>		<b>8,897,016</b>	<b>4,497,817</b>	<b>6,261,173</b>
<i>% Distribution</i>		<i>100%</i>		<i>59%</i>	<i>0%</i>
<b>Net Worth</b>	<b>(6,261,173)</b>		<b>(6,261,173)</b>		<b>(6,261,173)</b>

**1st Keystone Insurance Company**  
**Final Administrative Expenses**  
**Exhibit B**

<b>Vendor</b>	<b>Accrued</b>	<b>Projected</b>	<b>Total</b>	<b>Purpose</b>
FitzGibbons and Company	15,794	50,286	66,080	Administrative Fees and Costs
Plante Moran	5,000	5,000	10,000	Tax Preparation 2018 and 2019
Cube Smart, Arimingo and SC DOI	-	5,292	5,292	Storage of Records
Allstate Information Management	-	10,995	10,995	Record Destruction Fees
Go Daddy	-	55	55	IT Domain Fees
Mutual of Omaha Bank	-	1,000	1,000	Banking Fees
South Carolina Department of Insurance	288,562	-	288,562	SCDOI § 38-27-610 (1)(b)
Various Defense Counsel	12,050	-	12,050	Fees re: Stay/Notice Termination of Liquidation
<b>Total</b>	<b>321,406</b>	<b>72,628</b>	<b>394,033</b>	

First Keystone RRG, Inc. in Liquidation  
Class 2 Claims

POC No.	Claimant Name	Claim Amount	Court Allowed Amount	(1)	As Adjusted
101880	Patricia Horace	21,000.00	21,000.00		21,000.00
101076	Todd Rinaldo	250,000.00	80,000.00		80,000.00
100567	Donald Bunn	20,000.00	3,000.00		3,000.00
100810	Brenda E Taylor	125,000.00	50,000.00		50,000.00
100260	Lashunda Tucker M/N/G of Dashanira Tucker	250,000.00	1,078.08		1,078.08
100413	Jhawn Baskerville	5,000,000.00	5,000.00		5,000.00
100259	Lashunda Tucker M/N/G of Shupri Rhodall	250,000.00	8,015.10		8,015.10
101294	Yadira Garcia	82,860.80	15,000.00		15,000.00
101086	Shin Kurokawa	1,000,000.00	1,000,000.00		1,000,000.00
100508	Ashley McKean	1,981,778.20	1,000,000.00		1,000,000.00
101282	Gregory Cole & Gladys Cole	500,000.00	389,000.00		389,000.00
100326	Isreal Rodriguez	130,000.00	130,000.00		130,000.00
100666	Tim Dooley Admin of the Est Cyrus Carawan (Deceased)	10,000,000.00	100,000.00		100,000.00
101202	Kimberley Puleio	93,897.32	93,897.32		93,897.32
100329	Thomas R. Peterson, MD	156,505.00	73,601.18		73,601.18
101198	Ana Payamps	65,000.00	65,000.00		65,000.00
101255	Hackensack University Medical Cente -2	65,640.26	62,358.25		62,358.25
101298	Mary Warren	125,000.00	50,000.00		50,000.00
101167	William Loutas	50,000.00	50,000.00		50,000.00
101099	Jeffrey Dean	1,000,000.00	42,000.00		42,000.00
100341	Alice Tan	78,500.00	38,500.00		38,500.00
101211	Estate of Bu Do Jo By Admin Chong McIntire	35,000.00	35,000.00		35,000.00
100907	Thomas Leonessa	35,000.00	35,000.00		35,000.00
101080	Larry Bostic	1,000,000.00	34,000.00		34,000.00
101256	Donna Calhoun	33,500.00	33,500.00		33,500.00
101169	Lexa Cruz	unstated	30,000.00		30,000.00
100645	Jaclyn Stevens	30,000.00	30,000.00	30,000.00	-
101168	Dominick Carreon	unstated	30,000.00		30,000.00
100593	Rebecca S. Flake	300,000.00	30,000.00		30,000.00
100615	Jean R. Jordonne	27,000.00	27,000.00		27,000.00
100423	Gertrude Griffith	26,539.65	26,539.65		26,539.65
100619	Lucas Robinson	25,000.00	25,000.00		25,000.00
101209	Mohammad Jaffaran	25,000.00	25,000.00		25,000.00
101208	Eric Van Gelder	25,000.00	25,000.00		25,000.00
101218	Jack Sparacio	103,225.00	25,000.00		25,000.00
100524	Alpheria Hall & Kenneth Hall	25,000.00	25,000.00	17,500.00	7,500.00
101061	Estate of Timothy Francis Yocum	1,000,000.00	20,000.00		20,000.00
101920	Adminstator of the Estate of Tyrell Isiah-Jordan Elliot	10,000,000.00	20,000.00		20,000.00
100688	KASSA WOLDE GIORGIS	16,000.00	16,000.00		16,000.00
100427	Paul Boyer	16,000.00	16,000.00		16,000.00
100611	Audrey Reindiallo	unstated	15,000.00		15,000.00
101283	Myesha Romero	1,000,000.00	15,000.00	15,000.00	-
100640	Berta. L. Orellana	15,000.00	15,000.00		15,000.00
100888	Dora Bonilla	75,000.00	15,000.00		15,000.00
101105	Shawn Walker	120,503.00	15,000.00		15,000.00
100610	Elijah Chatman	unstated	15,000.00		15,000.00
101171	Tanais Perez	unstated	15,000.00		15,000.00
101170	Ashley Perez	unstated	15,000.00		15,000.00
100655	Phyllis Jones	50,000.00	15,000.00		15,000.00
101079	Ceara McCaskill	unstated	15,000.00		15,000.00
101199	Edwin N Guzman	15,000.00	15,000.00		15,000.00
101279	Marie Williams	2,000,000.00	15,000.00		15,000.00
101166	Evodio Veliz-Sanchez	101,700.00	15,000.00		15,000.00
100576	Brenda Brown	10,538.37	15,000.00		15,000.00
100505	Sonia Mosquera	175,000.00	15,000.00		15,000.00
100471	Janusz Kocol & Irene Kocol	600,000.00	15,000.00		15,000.00
100467	Geraldine Moore	100,000.00	15,000.00		15,000.00
100404	Luis Narvaez	15,000.00	15,000.00		15,000.00
100399	Garfield Wilson	50,000.00	15,000.00		15,000.00
100213	Sylvester Peoples	90,000.00	15,000.00		15,000.00
100169	Laura Leake	14,500.00	14,500.00		14,500.00
101226	Bennae Pickett	26,435.17	13,000.00		13,000.00

100200 Christopher Maluso	13,000.00	13,000.00		13,000.00
101058 Sandra Harris	12,500.00	12,500.00		12,500.00
101074 Mohamed Abdelrahman	28,140.00	12,500.00		12,500.00
100506 Pashawnda Briley	12,500.00	12,500.00		12,500.00
100563 Estanilao Jaquez	200,000.00	11,250.00		11,250.00
100562 Santiago Nazario	200,000.00	11,250.00		11,250.00
100801 Loretta Sills	11,000.00	11,000.00		11,000.00
100641 Nicholson Ephard	11,000.00	11,000.00		11,000.00
100289 Hector Mateo	10,500.00	10,500.00		10,500.00
101310 Andrea Dinkins	25,000.00	10,000.00		10,000.00
101535 Shantae Parham	50,000.00	10,000.00		10,000.00
101225 Latroya Singleton-Moore	1,000,000.00	10,000.00		10,000.00
101267 Sambo Yoth	10,000.00	10,000.00		10,000.00
101217 Toeum Vom	10,000.00	10,000.00		10,000.00
101214 Cheath Chea	10,000.00	10,000.00		10,000.00
100796 Joseph R Charles	unstated	10,000.00		10,000.00
100578 Felicia Tucker	12,000.00	10,000.00		10,000.00
100653 Carletta Jones	9,000.00	9,000.00		9,000.00
101215 Gladys Fortune	9,000.00	9,000.00		9,000.00
100148 Bernadette Redden	9,000.00	9,000.00		9,000.00
100144 Michael Panyanouvong	9,000.00	9,000.00		9,000.00
100234 Jaime Orenge - Guardian to Brunilda Acevedo	9,000.00	9,000.00		9,000.00
101232 Moussa Sangare	15,000.00	8,250.00		8,250.00
101097 Brittany Neal	50,000.00	8,000.00		8,000.00
100231 Xiao Rong WU	8,000.00	8,000.00		8,000.00
100883 Rahamata Sangare	50,000.00	7,500.00		7,500.00
101078 Marcella McCaskill	unstated	7,500.00		7,500.00
100362 Shontella Coleman	25,000.00	7,500.00		7,500.00
101212 Charles Blain	7,000.00	7,000.00		7,000.00
100585 Lamont McCAnn	125,000.00	7,000.00	7,000.00	-
100393 James Cohens	500,000.00	7,000.00		7,000.00
101095 Roslyn Covington	150,000.00	6,000.00		6,000.00
100519 Tamaree Tulatnyk	50,000.00	6,000.00		6,000.00
101276 Robert Herbst	25,000.00	5,000.00		5,000.00
100894 Brother Taxi LLC	6,040.76	5,000.00		5,000.00
101278 Daryl Funk	25,000.00	5,000.00		5,000.00
101180 Robert J. Peterson	44,600.00	5,000.00		5,000.00
100880 Svi Drazdouskaya	15,000.00	5,000.00		5,000.00
101213 Moises Rodriguez	5,000.00	5,000.00		5,000.00
100665 ANOUSSE CASIMIR	15,000.00	5,000.00		5,000.00
101220 Anousse Casimir	16,187.70	5,000.00		5,000.00
101195 Marquita Whitehead	79,000.00	5,000.00		5,000.00
101953 Johnny Torres	unstated	5,000.00		5,000.00
100159 Samir Hozayn	32,432.88	5,000.00		5,000.00
100441 Carlos Perez	unstated	5,000.00		5,000.00
100340 Fresnel E. Baptiste	unstated	5,000.00		5,000.00
100249 Kathy Jones	30,000.00	5,000.00		5,000.00
100654 Tayseer J Hweh	5,000.00	4,743.85		4,743.85
100606 December Andrews Ledbetter	5,000.00	4,233.27		4,233.27
100564 Kemisha Sales, Solomon M. Seifu	4,200.00	4,200.00		4,200.00
101146 Clifton Moragne	unstated	4,000.00		4,000.00
101291 Aalyiah Butler -G/A/L - Katherine Gutierrez	4,000.00	4,000.00		4,000.00
101221 Dejala Racine	3,500.00	3,500.00		3,500.00
101245 Ali Soltani	3,500.00	3,500.00		3,500.00
100314 Jon Nichols	3,500.00	3,500.00		3,500.00
100336 Winfred Ransom	unstated	3,246.00		3,246.00
100664 Kelly Parker	225,000.00	3,000.00		3,000.00
100410 Quintella Banks	25,000.00	3,000.00		3,000.00
100282 New Jersey Health Care Special	6,965.00	2,983.22		2,983.22
101136 Leslie Slaughter	7,000.00	2,500.00		2,500.00
101084 Willie Devlin	1,000,000.00	2,500.00		2,500.00
101197 Lisa Thompson	95,000.00	2,500.00		2,500.00
100267 Karimah Tyler-Cush	unstated	2,500.00	2,500.00	-
100689 Ryshine Greene	15,000.00	2,320.00		2,320.00
100134 Abdikarim Sharmarke	2,220.17	2,220.17		2,220.17
100318 Gregory Bell	2,000.00	2,000.00		2,000.00

100512 Eula Davis	6,253.01	1,942.36		1,942.36
101260 Maria Diaz	1,848.25	1,848.25		1,848.25
100686 Anthony Antonaccio	1,426.88	1,426.88		1,426.88
100895 Sri Lanka Taxi	1,985.74	1,300.00		1,300.00
101185 Sofia Ozol	1,192.94	1,192.94		1,192.94
101262 Vincent J. Grasso	1,067.61	1,067.61		1,067.61
100297 Dee Zandra Wright	38,600.00	1,000.00		1,000.00
100892 Tam Cab Co	1,414.08	950.00		950.00
101184 Joanna De Jesus	767.35	767.35		767.35
101290 Esayas Demissew	742.72	742.72		742.72
101056 German Chacon Fernandez	unstated	710.86		710.86
101890 Elite Anesthesia	1,925.76	525.76		525.76
101181 Bernadette Miller	2,405.24	500.00		500.00
100881 Quintin Smith	15,000.00	500.00		500.00
101189 Angelita Perez	676.21	480.71		480.71
101188 Dorothy W. Arnold	342.15	342.15		342.15
100254 Marlene Gino	500.00	325.00		325.00
101261 Stephanie Klein	288.34	288.34		288.34
100348 Michele Matteo	140.03	140.03		140.03
100311 David A. Wilkes	79.95	79.95		79.95
	<b>42,843,565.54</b>	<b>4,569,817.00</b>	<b>72,000.00</b>	<b>4,497,817.00</b>

(1) Adjustment pursuant to S.C. Code Ann. §§ 38-27-610(2) and 38-27-550(a)(3) and (c) (2015)