

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 20-CIV-21964-CMA**

SECURITIES AND EXCHANGE
COMMISSION,
Plaintiff,

v.

TCA FUND MANAGEMENT GROUP CORP.,
et al.,

Defendants.

**RECEIVER’S UNOPPOSED MOTION TO APPROVE
PAYMENT OF ADDITIONAL FUNDS TO MACROBERTS, LLP**

Jonathan E. Perlman, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through undersigned counsel, hereby files this Motion to Approve Payment of Additional Funds to MacRoberts, LLP (“Motion”) and accordingly states as follows:

1. On December 28 2020, this Court granted the Receiver’s Motion to Approve Counsel in New Zealand and Scotland, specifically MacRoberts, LLP (“MacRoberts”) and Bell Gully. [ECF No. 94].

2. As set forth in the Receiver’s Motion to Approve Counsel in New Zealand and Scotland, Master Fund is the 100% owner of Cleland Limited, a UK Registered entity that holds property in the Bellside Brea area of Scotland, U.K. *See* [ECF No. 93 at ¶ 7].

3. After weeks of negotiations, MacRoberts originally agreed to prepare the application to restore the property register as well as complete all necessary compliance with British Anti-Money Laundering statutes for a fixed fee of 16,050 GPB. *See* [ECF No. 93 at ¶ 11,

¹ All terms not specifically defined herein have the meaning ascribed to them in the SEC’s Motion for Appointment of Receiver [ECF No. 3] and the Court’s Appointment Order [ECF No. 5], and the Court’s First Expansion Order [ECF No. 16].

Ex. A].

4. MacRoberts has been diligently assisting the Receiver to restore Cleland Limited to the U.K. Companies' House Register and ownership of the property to Master Fund.

5. However, restoring Cleland Limited to the U.K. Companies' House Register and ownership of the property to Master Fund has taken longer than anticipated.

6. Accordingly, the Receiver seeks approval to pay an additional 970 GBP to MacRoberts for the costs of restoring Cleland Limited to the U.K. Companies' House Register, as well as an additional 2,500 GBP in fees to MacRoberts to finalize the application process, for a total of 3,470 GBP to be paid to MacRoberts for additional costs and fees.

7. If the U.K. Companies' House Register rejects Cleland Limited's application, Cleland Limited can be re-registered via a court proceeding, but such court proceeding will require additional fees to be paid to MacRoberts to accomplish same.

8. Therefore, the Receiver makes such request for additional fees without prejudice to requesting payment of additional fees and costs to MacRoberts if the U.K. Companies' House Register rejects Cleland Limited's application.

9. The Receiver has consulted with the Securities and Exchange Commission (the "SEC"), and is authorized to represent that the SEC has no objection to the relief requested herein.

10. This Motion is made in good faith and for the benefit of the Receivership and its stakeholders.

WHEREFORE, Receiver, Jonathan E. Perlman, by and through his undersigned counsel respectfully requests that this Honorable Court (1) grant the Motion to Approve Payment of Additional Funds to MacRoberts, LLP; (2) approve the payment of an additional 3,470 GBP to MacRoberts; and (3) for such other relief as this Court deems just and proper.

S.D. Fla. L.R. 7.1(A)(3) CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Receiver conferred with counsel for the SEC on September 29, 2022 via email, regarding the requested relief and is authorized to represent that the SEC does not oppose the relief sought.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on all counsel of record identified on the attached Service List via transmission of Notices of Electronic Filing generated by CM/ECF this 29th day of September, 2022.

/s/ Elizabeth G. McIntosh
Attorney

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**ORDER GRANTING RECEIVER'S UNOPPOSED MOTION TO APPROVE
PAYMENT OF ADDITIONAL FUNDS TO MACROBERTS, LLP**

THIS CAUSE, having come before the Court upon Jonathan E. Perlman, as court-appointed receiver's (the "Receiver") Unopposed Motion to Approve Payment of Additional Funds to MacRoberts, LLP (the "Motion"). The Court has considered the Motion and is otherwise duly advised in the premises. Accordingly, it is ORDERED AND ADJUDGED that:

- (1) The Motion is **GRANTED**.
- (2) The Receiver is authorized to pay MacRoberts, LLP the sum of 3,470 GBP, representing approved fees of 2,500 GBP and approved expenses of 970 GBP.

DONE AND ORDERED, in chambers at Miami, Florida, this ___ day of _____ 2022.

CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE