

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.

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**NOTICE OF COMPLIANCE**

Pursuant to the Court's Order [ECF No. 169] granting the Receiver's Motion to Compel Production of Documents From Precision Aerospace Group fka TCA Aerospace LLC [ECF No. 168], the Receiver, Jonathan E. Perlman, through undersigned counsel, gives notice and files an affidavit of the reasonable fees and costs incurred attached hereto as **Exhibit A**, and submits a proposed order awarding same attached hereto as **Exhibit B**.

Dated: August 30, 2021.

GENOVESE JOBLOVE & BATTISTA, P.A.  
*Attorneys for Jonathan E. Perlman, Receiver*  
100 N. Tampa Street, Suite 2600  
Tampa, Florida 33602  
Telephone: (813) 439-3100  
Facsimile: (813) 439-3110

By: /s/ Eric D. Jacobs

Gregory M. Garno, Esq.  
Florida Bar No. 87505  
[ggarno@gjb.law](mailto:ggarno@gjb.law)  
Eric D. Jacobs, Esq.  
Florida Bar No. 85992  
[ejacobs@gjb.law](mailto:ejacobs@gjb.law)

**CERTIFICATE OF SERVICE**

I certify that on August 30, 2021, a true and correct copy of the foregoing was served via CM/ECF Notification, E-Mail and/or U.S. Mail to all parties listed on the attached service list.

By: /s/ Eric D. Jacobs  
Eric D. Jacobs, Esq.

**SERVICE LIST**

***Securities and Exchange Commission v. TCA Fund Management Group Corp., et al.***  
**Case No. 20-Civ-21964-CMA**

Jonathan E. Perlman, Esq.  
[jperlman@gjb-law.com](mailto:jperlman@gjb-law.com)  
*Receiver for the Receivership Entities*

Gregory M. Garno, Esq.  
[ggarno@gjb-law.com](mailto:ggarno@gjb-law.com)  
Michael A. Friedman, Esq.  
[mfriedman@gjb-law.com](mailto:mfriedman@gjb-law.com)  
GENOVESE JOBLOVE & BATTISTA, P.A.  
100 Southeast 2nd Street, Suite 4400  
Miami, Florida 33131  
Telephone: (305) 349-2300  
*Attorneys for Jonathan E. Perlman, Receiver*

Andrew O. Schiff  
[schiffa@sec.gov](mailto:schiffa@sec.gov)  
Stephanie N. Moot  
[moots@sec.gov](mailto:moots@sec.gov)  
*Attorneys for Plaintiff Securities and Exchange Commission*  
801 Brickell Avenue, Suite 1950  
Miami, Florida 33131  
Telephone: (305) 982-6300  
Facsimile: (305) 536-4146

*Via U.S. Mail/Email*

Nathaniel P. T. Read, Esq.  
Cohen & Gresser LLP  
800 Third Avenue  
New York, NY 10022  
[nread@cohengresser.com](mailto:nread@cohengresser.com)  
*Attorneys for PAG*

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 20-cv-21964-CMA**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**TCA FUND MANAGEMENT GROUP, CORP.,  
a Florida company, et al.,**

**Defendants.**

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**DECLARATION OF ATTORNEY ERIC D. JACOBS IN SUPPORT  
OF RECEIVER'S AWARD OF FEES PURSUANT TO COURT ORDER**

ERIC D. JACOBS submits this declaration pursuant to the Court's Order [DE 169] granting the *Receiver's Motion to Compel Production of Documents From Precision Aerospace Group fka TCA Aerospace LLC* [DE 168] (the "Motion"), and says:

1. I am a partner at the law firm of Genovese Joblove & Battista, P.A. ("GJB") and, in that capacity, I oversaw and supervised the preparation and filing of the Motion, which sought to compel Precision Aerospace Group fka TCA Aerospace LLC ("PAG") to produce documents pursuant to a subpoena, along with an award of attorney's fees and costs incurred bringing the Motion against PAG.

2. I am a member in good standing of the Florida Bar, a member of the Federal Bar for the United States District Court for the Southern District of Florida, and I am otherwise qualified to practice before this Court.

3. The Court's Order determined that the Receiver is entitled to an award of reasonable fees and costs incurred bringing the Motion.

4. Attached as “Exhibit 1” to this Declaration is an excerpt from GJB’s time records for this matter. Exhibit 1 shows time entries totaling 9.80 hours and \$2,889.50 in fees and \$1.02 in costs for services provided in preparing, filing, serving, and otherwise prosecuting the Motion, including the preparation, submission and service of the Order.

5. The hourly rates charged for this matter are consistent with the hourly rates GJB bills to its clients in other similar matters. This Court has approved and awarded fees under these rates in this and other matters, as have other courts within and outside of this district in comparable matters involving GJB and other counsel of like reputation and experience.

**Declaration Pursuant to 28 U.S.C. § 1746**

Pursuant to Section 1746, Title 28, of the United States Code, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 30th day of August 2021 in the State of Florida.

By: /s/ Eric D. Jacobs  
ERIC D. JACOBS

# **EXHIBIT 1**

## GENOVESE JOBLOVE &amp; BATTISTA,P.A.

JONATHAN PERLMAN, RECEIVER - TCA FUND - TCA GLOBAL RECEIVERSHIP

Client: 12445

SUMMARY OF FEES & COSTS RELATED TO MOTION TO COMPEL DOCUMENTS FROM  
PRECISION AEROSPACE GROUP fka TCA AEROSPACE LLC

Date	Lawyer	Work Description	Time	Rate	Value
7/26/2021	JEP	Receipt and review of TCA Aerospace objections for documents (.4); review Adovnic correspondence re same (.2); draft email re strategy and motion to compel to Sadovnic, Friedman, including relevant caselaw (.5).	1.10	\$ 340.00	\$ 374.00
8/12/2021	IRS	Call with JEP, EJ re: Aerospace motion to compel.	0.40	\$ 265.00	\$ 106.00
8/12/2021	EJ	Telephone call with Irina Sadvonic regarding drafting motion to compel turnover from Precision Aerospace Group, status of confidentiality agreement, and scope of potential agreed production.	0.30	\$ 340.00	\$ 102.00
8/13/2021	EJ	Initial drafting of, and legal research for, motion to compel production of documents from Precision Aerospace Group	1.70	\$ 340.00	\$ 578.00
8/18/2021	JEP	Review and edit draft motion to compel TCA Aerospace/Precision.	1.10	\$ 340.00	\$ 374.00
8/18/2021	JEP	Phone conferene with E. Jacobs re facts, documents and changes to motion to compel against TCA Aerospace/Precision Aerospace Group.	1.50	\$ 340.00	\$ 510.00
8/16/2021	BT	Review case file and subpoenas issues, and begin drafting motion to compel production of documents directed to Aerospace/Precision.	0.80	\$ 100.00	\$ 80.00
8/18/2021	IRS	Confer with E. Jacobs re: motion to compel Aerospace.	0.20	\$ 265.00	\$ 53.00
8/18/2021	IRS	Review draft motion to compel Aerospace and internal correspondence re: same.	0.50	\$ 265.00	\$ 132.50
8/18/2021	EJ	Continued revisions to motion to compel production of documents from Precision Aerospace (1.1); telephone call with the Receiver to review same motion (.4).	1.50	\$ 340.00	\$ 510.00
8/19/2021	BT	Revise and file motion to compel production of documents from Aerospace (.5); prepare and send service of court email to counsel for Aerospace (.2).	0.70	\$ 100.00	\$ 70.00
<b>Total Fees</b>			<b>9.80</b>	<b>\$</b>	<b>2,889.50</b>
Disbursement Summary 8/19/2021		Postage			\$ 1.02
<b>Total Costs</b>					<b>\$ 1.02</b>
<b>Total Fees &amp; Costs</b>				<b>\$</b>	<b>2,890.52</b>

# **EXHIBIT B**

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP, CORP.,  
a Florida company, et al.,

Defendants.

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**ORDER AWARDING FEES**

THIS CAUSE came before the Court upon Receiver Jonathan E. Perlman, Esq.'s Notice of Compliance [ECF No. \_\_\_] with the Court's Order [ECF No. 169] directing the Receiver to file an affidavit of reasonable fees and costs incurred in bringing the Motion to Compel Production of Documents From Precision Aerospace Group fka TCA Aerospace LLC [ECF No. 168]. The Court having considered the Notice and the attachments, and being otherwise fully advised, it is:

**ORDERED AND ADJUDGED** as follows:

1. For services rendered in connection with the Motion by Receiver's counsel, Genovese Joblove & Battista, P.A., the Court awards the Receiver \$2,889.50 in fees and \$1.02 in costs for a total award of **\$2,890.52** against Precision Aerospace Group fka TCA Aerospace LLC ("PAG"). PAG shall pay the fee award within ten (10) days of this Order.

DONE AND ORDERED in Miami, Florida this \_\_\_\_\_ day of \_\_\_\_\_ 2021.

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**CECILIA M. ALTONAGA**  
**UNITED STATES DISTRICT JUDGE**

cc: counsel of record