

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

FILED

2009 DEC 10 P 1:19

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ROBERT R. ROSS, GEORGE J. KUNDRAT,  
CHANCE M. VOUGHT, JOHN M. LUCARELLI,  
and FREDERICK J. RAILA

Defendants.

U.S. DISTRICT COURT  
NEW HAVEN, CT

3:05 CV 1036 (JBA)

**ORDER ADOPTING PROPOSED DISTRIBUTION PLAN,  
DISBURSING FUNDS, AND APPOINTING DISTRIBUTION AGENT**

Having reviewed Plaintiff Securities and Exchange Commission's ("Commission") Motion for Adoption of Proposed Distribution Plan, Disbursement of Funds, and Appointment of Distribution Agent ("Motion"), and finding that there is good cause for the Motion, the Court hereby finds and orders as follows:

A. Distribution Plan and Disbursement of Funds

1. The proposed distribution plan as described in the Declaration of Kevin M. Kelcourse submitted by the Commission ("Declaration") and attached hereto as Exhibit A is fair and reasonable.

2. The proposed distribution plan set forth in the Declaration is hereby adopted as the Distribution Plan in this matter. Each Eligible Claimant (as defined in the Distribution Plan) who filed a Claim Form with the Commission prior to November 15, 2007, shall receive the fixed amount of \$4.19 per Eligible Share (as defined in the Declaration).

3. The Clerk is directed to release all monies in an interest-bearing account, account number 3755032731 (Bank of America) under the case name designation "SEC v. Robert R. Ross, et al." (the "Distribution Fund") to the Distribution Agent, who shall then promptly begin to distribute the monies therein to injured investors in accordance with the Distribution Plan.

4. Following the transfer of the Distribution Fund to the Distribution Agent, the Distribution Agent shall be responsible for making all payments to fulfill the tax obligations of the Fund, as determined by the Tax Administrator previously appointed in this matter or the relevant taxing authority.

B. Appointment of Distribution Agent

5. The Commission's motion to appoint a distribution agent is granted, and Damasco & Associates is appointed as Distribution Agent in accordance with the following provisions of this Order.

6. The Distribution Agent shall oversee the distribution of settlement monies currently being held in the Distribution Fund to injured investors through the establishment of a Fair Fund pursuant to the provisions of Section 308(a) of the Sarbanes-Oxley Act of 2002 [15 U.S.C. § 7246(a)]. In particular, these funds shall be distributed to persons or entities who submitted stock order forms requesting stock in the NewAlliance Bancshares, Inc. initial public offering but who did not receive all the shares they requested, and who submitted claims forms to the Commission prior to November 15, 2007 ("Eligible Claimants"). In no event shall the Eligible Claimants include any of the Defendants in this action, SEC v. Slesinger, et al., 3:06cv0839-CFD, and/or SEC v. Rice, 3:06cv838-MRK, or their heirs or assigns.<sup>1</sup>

7. The Distribution Agent is not required to post a bond or give an undertaking of any type in connection with its duties and obligations pursuant to this Order.

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<sup>1</sup> Accordingly, the claim submitted by Jay Slesinger, a defendant in SEC v. Slesinger, is hereby denied.

8. The Distribution Agent is required to exercise good faith business judgment in fulfilling its duties and responsibilities pursuant to this Order. The Distribution Agent is entitled to rely on all rules of law and court orders, and shall not be liable to anyone for its own good faith compliance with any order, rule, law, judgment, or decree. The Distribution Agent shall not be liable for complying with the orders of this Court. In no event shall the Distribution Agent be liable to any of the Defendants for its good faith compliance with the terms and provisions of this Order, nor shall the Distribution Agent be liable to anyone for any action taken or omitted by it except upon a finding by this Court that the Distribution Agent acted or failed to act as a result of misfeasance, bad faith, gross negligence, or in reckless disregard of its duties.

9. The Distribution Agent is hereby authorized, empowered and directed to:

- a. oversee the distribution of monies in the Distribution Fund, in consultation with Commission staff, as provided herein;
- b. as to potential Eligible Claimants for whom there is no last known address or whose last known address is invalid, use economical and reasonable efforts to locate such potential Eligible Claimants, such as consulting phone books, national white pages software, computer databases, internet resources, and forwarding address information obtained from the post office;
- c. The Distribution Agent shall establish and maintain a separate escrow account from which the Distribution Agent shall make distributions to Eligible Claimants and shall pay its Court-approved fees and expenses.
- d. upon Court approval of the Distribution Plan, and upon order of the Court releasing the Distribution Fund to the Distribution Agent, deposit the Distribution Fund in a separate escrow account, establish and maintain that account, make distributions to



Eligible Claimants from that account, and pay all accountant fees, taxes and its Court-approved fees and expenses from that account.

10. The Distribution Agent shall be reimbursed for all reasonable costs, fees and other expenses incurred in the performance of the Distribution Agent's duties. The Distribution Agent shall be compensated for services rendered by its Principals at an hourly rate not to exceed \$425 for principal attorneys and \$500 for principal certified public accountants, for services rendered by its senior accounting staff at an hourly rate not to exceed \$230, for services rendered by its non-principal attorneys at an hourly rate not to exceed \$300, and for services rendered by its staff at an hourly rate not to exceed \$100 (administrative) or \$190 (accounting). Absent any extraordinary, unusual or unforeseen events, litigation or other proceedings, the Distribution Agent has agreed that fees for its professional services and costs shall be capped at \$11,300, exclusive of any tax compliance costs of the Tax Administrator.

11. The Distribution Agent shall be compensated from the funds in the Distribution Fund; provided, however, that, before being paid any such compensation, the Distribution Agent must: (a) provide all fee applications (detailing all time and expenses claimed and the nature of the services performed) to counsel for the Commission for review and approval as to reasonableness at least ten days prior to the submission thereof for Court approval; and (b) obtain approval of payment of all fees and expenses from this Court, which shall review such fees and expenses for reasonableness in determining whether such payment will be approved.

12. The Distribution Agent may be removed at any time by the Court and replaced with a successor. In the event the Distribution Agent decides to resign, the Distribution Agent shall first give written notice to the Commission and the Court of its intention, and its resignation shall not be effective until the Court has appointed a successor. The Distribution Agent shall

follow such instructions as the Court gives it in connection with surrendering its work product and/or possession of any monies in the Distribution Fund to its successor.

13. Within 150 days of the completion of its duties pursuant to this Order, the Distribution Agent shall prepare a Notice of Termination to be filed with the Court, seeking discharge by the Court from its responsibilities as Distribution Agent. The Distribution Agent shall submit the Notice of Termination to Commission staff for review prior to the filing thereof with the Court. The Notice of Termination shall include a final report, summarizing all of the Distribution Agent's activities, providing a final accounting of the funds in the Disgorgement Fund, and reporting on the final disposition of any distributions or legal claims. To the extent additional funds remain in the Distribution Fund at the time of the filing of the Notice of Termination, the Notice shall include a recommendation, approved by the Commission staff, for the disposition of any such funds. The Distribution Agent also shall submit an application for a final award of fees and expenses at the same time as the final report, which fees and expenses, upon Court approval, shall be paid from the Distribution Fund.

14. The provisions of this Order shall remain in full force and effect until further order of the Court.

Dated: 9 December, 2009

/s/ Janet Bond Arntson, USDJ

U.S. District Judge

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ROBERT R. ROSS, GEORGE J. KUNDRAT,  
CHANCE M. VOUGHT, JOHN M. LUCARELLI,  
and FREDERICK J. RAILA

Defendants.

3:05 CV 1036 (JBA)

**DECLARATION OF KEVIN M. KELCOURSE: DISTRIBUTION PLAN**

I, Kevin M. Kelcourse, pursuant to 28 U.S.C. §1746, hereby declare, based on personal knowledge or personal belief, except where indicated, that:

1. I am employed as a Branch Chief with the U.S. Securities and Exchange Commission ("SEC") in its Boston Regional Office in Boston, Massachusetts. I have been employed by the SEC since June 1999. My duties include, among other things, conducting investigations relating to potential violations of the federal securities laws and litigation relating thereto.

**ACTIVITIES TO DATE**

2. In April 2004, the SEC staff opened an investigation into potential violations of the federal securities laws in connection with the initial public offering ("IPO") of NewAlliance Bancshares, Inc. ("NewAlliance"), which resulted from the conversion of New Haven Savings Bank ("NHSB") from mutual to stock form of organization. In offering to sell shares in the IPO, NewAlliance provided to each



depositor of NHSB a prospectus setting forth the process pursuant to which depositors could request to purchase NewAlliance shares.

3. In total, NewAlliance offered to sell approximately 102,000,000 shares of stock at a price of \$10 per share. Depositors submitted stock order forms requesting to purchase over 160,000,000 shares of NewAlliance stock.<sup>1</sup> As a result, the offering was oversubscribed. NewAlliance retained Crowe Chizek, an accounting and consulting firm, who, pursuant to a formula set forth in the prospectus (based primarily on how much money each depositor had in its account on June 30, 2002), determined how many shares each depositor would actually receive. Because the offering was oversubscribed, approximately 2100 depositors did not receive all the shares they requested. Rather, they received the number of shares to which they were entitled under the formula set forth in the prospectus, and NewAlliance also returned the funds that would have been used to purchase additional shares but for the oversubscription plus some interest. As a result, none of the approximately 2100 depositors actually lost any money; rather, they lost the opportunity to purchase additional shares of NewAlliance stock in the IPO and to earn a potential profit on the sale of such shares.

4. As a result of the SEC investigation, three separate civil enforcement actions have been filed and settled. They are: SEC v. Robert R. Ross, et al., 3:05cv1036-JBA; SEC v. Slesinger, et al., 3:06cv0839-CFD; and SEC v. Rice, 3:06cv838-MRK.<sup>2</sup> In these actions, the total number of NewAlliance shares at issue was 790,000.

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<sup>1</sup> Depositors were required to pay for the full amount of shares requested at the time they submitted their stock order form.

<sup>2</sup> A fourth civil injunctive action is still pending and is in litigation: SEC v. Richetelli, 3: 09-cv-00361-CFD.



5. As a result of these actions, payments totaling \$3,286,048.00 have been made into the Court Registry. Including interest, the total amount of funds currently (as of November 23, 2009) in an interest-bearing account, account number 3755032731 (Bank of America) under the case name designation "SEC v. Robert R. Ross, et al." (the "Distribution Fund") is \$3,332,257.90. The final payment was made into the Distribution Fund by defendant John Lucarelli on December 19, 2008.

6. On or about October 9, 2007, SEC staff sent claim forms by mail, in the form attached hereto as Exhibit 1, to the approximately 2100 depositors who did not receive all the shares they requested. If claim forms were returned by the U.S. Postal Service, the SEC staff conducted additional searches via computer databases in an attempt to locate the depositors in question. In those cases in which the SEC staff was able to locate a new address, the claim forms were re-sent.

7. Of these approximately 2100 depositors, 641 depositors returned their claim forms. These depositors are hereinafter referred to as "Eligible Claimants."<sup>3</sup>

8. In order to determine how to most fairly distribute the Distribution Fund, the SEC staff consulted with Crowe Horwath, the successor to Crowe Chizek. Crowe Horwath, using the same formula it used in determining how to allocate the NewAlliance stock due to the oversubscription in April 2004, determined which of the Eligible Claimants would have received how many, if any, shares had the defendants in the various civil enforcement actions not committed fraud. In other words, Crowe Horwath, using the allocation formula set forth in the prospectus, was able to determine exactly how many of the 790,000 shares at issue would have been received by each of the

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<sup>3</sup> Among these depositors was Jay Slesinger, a defendant in *SEC v. Slesinger*. The final judgment entered against Slesinger, attached hereto as Exhibit 2, expressly prohibits Slesinger from participating in this Distribution Fund. Accordingly, Slesinger is not an Eligible Claimant.

Eligible Claimants but for the fraud ("Eligible Shares"). A copy of this analysis, with personal identifying information redacted, is attached hereto as Exhibit 3.<sup>4</sup>

9. Other than the claim form submitted by Jay Slesinger discussed in footnote 3 above, no claims have been rejected.

#### **DISTRIBUTION PLAN**

10. It is respectfully requested that the Court enter an Order adopting a Distribution Plan as follows: Each Eligible Claimant shall receive \$4.19 per Eligible Share. This figure was calculated as follows: \$3,317,857 (the total amount currently in the Distribution Fund less the \$14,400 to cover fees set forth in paragraph 16 below) divided by 790,000 shares at issue in the Commission's three civil enforcement actions.

11. Submitted herewith as Exhibit 3 is a spreadsheet listing all the claims submitted herein (with the exception of the claim submitted by Jay Slesinger discussed above). The printout lists all the Eligible Claimants (with personal identifying information redacted) and shows the number of Eligible Shares each claimant would have received but for the fraud.<sup>5</sup>

12. The SEC staff shall provide the complete computer printout (including personal identifying information) to the Distribution Agent so that the Distribution Agent may send checks to the Eligible Claimants.

13. To the extent an Eligible Claimant has had a change of address, the Distribution Agent shall use economical and reasonable efforts to locate such potential

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<sup>4</sup> Crowe Horwath also calculated an approximate distribution amount based upon an estimated Distribution Fund of \$3,200,000. Because that amount was only an estimate, the analysis attached at Exhibit 3 does not include Crowe Horwath's approximation.

<sup>5</sup> The printout includes 685 entries because, of the 641 Eligible Claimants, certain of them had multiple accounts that would have received additional shares but for the fraud.

Eligible Claimants, such as consulting phone books, national white pages software, computer databases, internet resources, and forwarding address information obtained from the Post Office.

14. If, after using such economical and reasonable efforts to locate Eligible Claimants, and after the payment of fees and expenses of the Distribution Agent and Tax Administrator (including the payment of any taxes due), there remains any money in the Distribution Fund, such moneys will be transferred to the U.S. Treasury or distributed to Eligible Claimants upon motion of the Commission.

15. It is respectfully requested that the Court enter an Order: (a) approving the above distribution plan, including the determinations accepting the claims submitted herein and rejecting the claim of Jay Slesinger; (b) authorizing the release of the funds currently in the Disgorgement Fund to the Distribution Agent; and (c) authorizing the deposit of those funds in an escrow account (the "Escrow Account") to be established in the name of the Distribution Agent in a suitable national bank.

#### **FEES AND EXPENSES**

16. To cover the fees and expenses of the Distribution Agent and the Tax Administrator, as well as any taxes due by the Distribution Fund, approximately \$14,400 of the Distribution Fund should be reserved. The Commission's counsel will submit a separate proposed order authorizing disbursement of those funds at the appropriate time.

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

Executed on November 25, 2009, in Boston, Massachusetts.

  
Kevin M. Kelcourse



## **Exhibit 1**



**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

Boston Regional Office  
33 Arch Street, 23<sup>rd</sup> Floor  
Boston MA 02110  
Telephone: (617) 573-8900  
Telecopier: (617) 573-4590

To: Certain New Haven Savings Bank Depositors

From: Securities and Exchange Commission  
Boston Regional Office

Date: October 9, 2007

Subject: Notice of Potential Claim in the Matter of NewAlliance Bancshares, Inc.  
(B-02052)

You have been identified as a potential victim in connection with certain violations of the federal securities laws arising from the conversion of New Haven Savings Bank ("NHSB") from mutual to stock form of ownership in 2004. During the course of that conversion, certain individuals entered into agreements regarding the sale or transfer of NewAlliance Bancshares, Inc. ("NewAlliance") stock in violation of federal law. As a result, the Securities and Exchange Commission ("SEC") has to date brought three civil enforcement actions in federal district court in New Haven, Connecticut: SEC v. Robert Ross, et al., 3:05-cv-01036-JBA (D. Conn.); SEC v. Jay Slesinger, et al., 3:06-cv-839-CFD (D. Conn.); and SEC v. Jay Rice, 3:06-cv-8380MRK (D. Conn.). As a result of these actions, various defendants have paid money into the Clerk of Court pursuant to final judgments entered by the Court. Subject to Court approval, the SEC intends to distribute these funds to certain victims in this matter.

This memorandum will provide you with important information you will need in order to make a claim and answers various questions you might have. You should read this memorandum very carefully and in its entirety. If, after reading this memorandum, you still have questions, you may contact the Commission staff by e-mail ([newalliance@sec.gov](mailto:newalliance@sec.gov)) or by phone (617-573-8818).

*What must I do to make a claim?*

You must complete the attached claim form, sign it under penalty of perjury, and send the original to the SEC's Boston Regional Office at the following address:

Securities and Exchange Commission  
Boston Regional Office  
Attn: Sheila D'Entremont  
33 Arch Street, 23<sup>rd</sup> Floor  
Boston, MA 02110

You must send your signed claim form by regular mail or overnight delivery to the above address so that it is postmarked no later than November 15, 2007.

*How much money will be distributed to victims?*

To date, the SEC has collected approximately \$3.2 million in connection with the fraudulent acquisition of approximately 790,000 shares of NewAlliance stock.

*How many potential victims are there, and who are they?*

The potential victims include all NHSB Tier 1 depositors who requested more shares than they received. Tier 1 depositors are defined in the NewAlliance prospectus as those NHSB depositors who had accounts open with a balance of at least \$50 on June 30, 2002. There are over 2,000 Tier 1 depositors who requested more shares than they received. Because the offering was oversubscribed by approximately 65 million shares at the Tier 1 level, no one beyond Tier 1 depositors would have received any of the shares in question, and thus are not potential victims.

*Will I be guaranteed to receive money?*

No. The money collected thus far in the SEC's investigation will be distributed to those NHSB depositors who would have received the 790,000 shares of NewAlliance stock that were obtained by the defendants in the three civil enforcement actions noted above. As you may recall, the NewAlliance prospectus sets forth an allocation procedure in the event that, as happened here, the offering was oversubscribed. Using that same allocation formula, it can be determined who would have actually received the shares obtained by the defendants. Those NHSB depositors will then receive a pro rata share of the money paid in to the Court to date based upon the number of shares they would have received. For example, if, based on the allocation formula, it is determined that you would have received 100 of the shares obtained by the defendants, you would receive approximately \$400. (Dividing the \$3.2 million collected thus far by 790,000 (the number of shares obtained by the defendants) results in approximately \$4 per share; \$4 per share multiplied by 100 shares equals \$400.)



*If I receive money in connection with this distribution, when will I receive it?*

That date is uncertain. Several steps need to be completed first. The deadline for submitting a claim form is November 15, 2007. The Commission staff will then review all the claims forms to ensure that everyone submitting a claim is eligible to receive a portion of the distribution. The allocation formula will then be run to determine, out of those eligible, who would have received the stock at issue. The Commission staff will then submit a distribution plan to the Court for its approval. Assuming the Court approves the distribution plan, checks will be sent out promptly.

*If I receive money in connection with this distribution, will there be any tax consequences?*

There may be tax consequences to you if you receive money in connection with this distribution. You should consult your tax adviser for further guidance.

*If I requested more shares than I received, what would make me ineligible to participate in this distribution?*

NHSB depositors who entered into agreements regarding the sale or transfer of the stock will not be eligible to participate in this distribution. For example, the depositors who acted as nominees for the defendants to obtain NewAlliance stock in the matters set forth above would not be eligible to participate in this distribution. Other NHSB depositors who engaged in similar conduct would similarly be ineligible to participate in the distribution.

*If I don't receive any money in connection with this distribution, will I receive money in the future?*

It is possible that additional money will be available for distribution at a later date. However, the SEC will notify potential victims only this one time. If you want to be eligible for any future distribution, you must submit a claim form no later than November 15, 2007.

*If I have any other questions, what should I do?*

As noted above, you may contact the SEC by either e-mailing your question to [newalliance@sec.gov](mailto:newalliance@sec.gov), or you may call (617) 573-8814 until November 30, 2007, and leave a message. We will then respond as soon as possible.





**U.S. SECURITIES AND EXCHANGE COMMISSION  
BOSTON REGIONAL OFFICE**

**CLAIM FORM**

**SUBJECT: In the Matter of NewAlliance Bancshares, Inc. (B-02052)**

**THIS IS A ONE-PAGE CLAIM FORM. IF YOU NEED ADDITIONAL SPACE FOR ANY QUESTION, PLEASE ATTACH ADDITIONAL PAGES. PLEASE NOTE: THIS CLAIM FORM MUST BE POSTMARKED BY 11/15/07.**

1. Our records indicate that, in connection with the conversion of New Haven Savings Bank, you requested shares of NewAlliance Bancshares prior to March 11, 2004, but did not receive all the shares you requested.

Is this correct? ☐ Yes ☐ No

2. Describe specifically the source(s) of funds you used to pay for the requested shares (for example, bank account name, equity line of credit (including name of debtor), name of third party, etc.):

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3. Did anyone provide you with any funds, by a loan or any other means, to buy the requested shares?

☐ Yes ☐ No

If yes, please state the name(s) of the individual(s) or entity(ies), their address(es), and their phone number(s). For any individuals, please identify any business association or affiliation.

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If yes, did you provide a share of any profits you earned on the sale of NewAlliance stock or any of the NewAlliance stock you received to such individual or entity? If so, state the amount of profits or stock you provided to such individual or entity (by percentage and/or actual dollar amount) and the date you provided such profits or stock.

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

**Date:** \_\_\_\_\_, 2007

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**Signature**

## **Exhibit 2**

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

JAY SLESINGER and  
MAURICE SERVETNICK,

Defendants

and MOSHE ARIEL,

Relief Defendant.

Civil Action No.

306CV00839

CFD

FINAL JUDGMENT AS TO DEFENDANT JAY SLESINGER

The Securities and Exchange Commission having filed a Complaint and Defendant Jay Slesinger having entered a general appearance; consented to the Court's jurisdiction over Defendant and the subject matter of this action; consented to entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment:

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant and Defendant's agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of this Final Judgment by personal service or otherwise are permanently restrained and enjoined from violating, directly or indirectly, Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act") [15 U.S.C. § 78j(b)] and Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5], by using any means or

instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange, in connection with the purchase or sale of any security:

- (a) to employ any device, scheme, or artifice to defraud;
- (b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- (c) to engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

## II.

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is liable for disgorgement of \$447,306, representing profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$33,813, and a civil penalty in the amount of \$120,000 pursuant to Section 21(d) of the Exchange Act. Defendant shall satisfy this obligation by paying \$601,119 within ten business days to the Clerk of this Court, together with a cover letter identifying Jay Slesinger as a defendant in this action; setting forth the title and civil action number of this action and the name of this Court; and specifying that payment is made pursuant to this Final Judgment. Defendant shall simultaneously transmit photocopies of such payment and letter to the Commission's counsel in this action. By making this payment, Defendant relinquishes all legal and equitable right, title, and interest in such funds, and no part of the funds shall be returned to Defendant. Defendant shall pay post-judgment interest on any delinquent amounts pursuant to 28 U.S.C. § 1961.

The Clerk shall deposit the funds into an interest bearing account with the Court Registry



Investment System ("CRIS"). These funds, together with any interest and income earned thereon (collectively, the "Fund"), shall be held by the CRIS until further order of the Court. In accordance with 28 U.S.C. § 1914 and the guidelines set by the Director of the Administrative Office of the United States Courts, the Clerk is directed, without further order of this Court, to deduct from the income earned on the money in the Fund a fee equal to ten percent of the income earned on the Fund. Such fee shall not exceed that authorized by the Judicial Conference of the United States.

The Commission may by motion propose a plan to distribute the Fund subject to the Court's approval. Such a plan may provide that the Fund shall be distributed pursuant to the Fair Fund provisions of Section 308(a) of the Sarbanes-Oxley Act of 2002. Regardless of whether any such Fair Fund distribution is made, amounts ordered to be paid as civil penalties pursuant to this Judgment shall be treated as penalties paid to the government for all purposes, including all tax purposes. To preserve the deterrent effect of the civil penalty, Defendant shall not, after offset or reduction of any award of compensatory damages in any Related Investor Action based on Defendant's payment of disgorgement in this action, further benefit by offset or reduction of such compensatory damages award by the amount of any part of Defendant's payment of a civil penalty in this action ("Penalty Offset"). If the court in any Related Investor Action grants such a Penalty Offset, Defendant shall, within 30 days after entry of a final order granting the Penalty Offset, notify the Commission's counsel in this action and pay the amount of the Penalty Offset to the United States Treasury or to a Fair Fund, as the Commission directs. Such a payment shall not be deemed an additional civil penalty and shall not be deemed to change the amount of the civil penalty imposed in this Judgment. For purposes of this paragraph, a "Related Investor

Action" means a private damages action brought against Defendant by or on behalf of one or more investors based on substantially the same facts as alleged in the Complaint in this action.

**III.**

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Consent is incorporated herein with the same force and effect as if fully set forth herein, and that Defendant shall comply with all of the undertakings and agreements set forth therein.

**IV.**

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

Dated: July 19, 2006

*M. J.*

UNITED STATES DISTRICT JUDGE

## **Exhibit 3**



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	750	195	555	17
Redacted	44,600	11,392	33,208	998
Redacted	25,000	10,661	14,339	934
Redacted	70,000	23,648	46,352	2071
Redacted	15,148	12,977	2,171	1137
Redacted	10,000	1,988	8,012	174
Redacted	30,000	10,777	19,223	944
Redacted	70,000	41,796	28,204	3661
Redacted	2,000	382	1,618	33
Redacted	68,000	9,795	58,205	858
Redacted	70,000	58,802	11,198	5150
Redacted	70,000	11,802	58,198	1034
Redacted	70,000	8,905	61,095	780
Redacted	70,000	7,873	62,127	690
Redacted	70,000	54,078	15,922	4737
Redacted	20,000	11,127	8,873	975
Redacted	70,000	7,042	62,958	617
Redacted	3,300	607	2,693	53
Redacted	3,180	588	2,592	52
Redacted	9,500	1,567	7,933	137
Redacted	34,600	5,446	29,154	477
Redacted	70,000	9,267	60,733	812
Redacted	4,000	625	3,375	55
Redacted	70,000	26,493	43,507	2320
Redacted	70,000	11,744	58,256	1029
Redacted	70,000	17,566	52,434	1539
Redacted	70,000	17,566	52,434	1539
Redacted	70,000	19,405	50,595	1700
Redacted	65,700	22,062	43,638	1932
Redacted	70,000	65,442	4,558	4558
Redacted	10,000	1,634	8,366	143
Redacted	70,000	22,169	47,831	1942
Redacted	64,700	58,551	6,149	5128
Redacted	2,500	2,356	144	144
Redacted	1,800	1,723	77	77
Redacted	500	222	278	19
Redacted	30,000	11,302	18,698	990
Redacted	70,000	62,618	7,382	5485
Redacted	30,500	23,547	6,953	2062
Redacted	70,000	12,950	57,050	1134
Redacted	70,000	49,507	20,493	4336
Redacted	70,000	51,211	18,789	4485
Redacted	70,000	51,209	18,791	4485
Redacted	70,000	62,360	7,640	5462
Redacted	70,000	12,950	57,050	1134
Redacted	70,000	62,360	7,640	5462
Redacted	70,000	51,255	18,745	4489
Redacted	2,000	1,525	475	134
Redacted	25,370	4,412	20,958	386
Redacted	14,735	2,602	12,133	228



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	14,680	2,594	12,086	227
Redacted	15,215	2,683	12,532	235
Redacted	23,330	4,064	19,266	356
Redacted	12,730	2,262	10,468	198
Redacted	14,440	2,553	11,887	224
Redacted	19,500	3,413	16,087	299
Redacted	70,000	69,002	998	998
Redacted	27,500	4,795	22,705	420
Redacted	12,500	2,233	10,267	196
Redacted	30,000	5,223	24,777	457
Redacted	41,681	20,859	20,822	1827
Redacted	19,135	8,285	10,850	726
Redacted	8,000	3,520	4,480	308
Redacted	70,000	12,245	57,755	1073
Redacted	60,000	10,589	49,411	927
Redacted	47,000	11,046	35,954	967
Redacted	700	613	87	54
Redacted	5,070	3,832	1,238	336
Redacted	70,000	9,193	60,807	805
Redacted	70,000	30,439	39,561	2666
Redacted	50,000	8,852	41,148	775
Redacted	11,700	5,634	6,066	493
Redacted	15,500	7,431	8,069	651
Redacted	33,500	15,948	17,552	1397
Redacted	9,300	4,497	4,803	394
Redacted	3,000	2,830	170	170
Redacted	70,000	34,461	35,539	3018
Redacted	12,500	9,188	3,312	805
Redacted	60,000	12,782	47,218	1120
Redacted	40,000	11,594	28,406	1015
Redacted	70,000	11,543	58,457	1011
Redacted	41,500	22,189	19,311	1943
Redacted	2,000	290	1,710	25
Redacted	16,460	11,790	4,670	1033
Redacted	1,000	629	371	55
Redacted	40,000	12,906	27,094	1130
Redacted	30,700	8,909	21,791	780
Redacted	10,000	8,843	1,157	775
Redacted	20,000	12,778	7,222	1119
Redacted	20,000	12,776	7,224	1119
Redacted	70,000	8,855	61,145	776
Redacted	70,000	8,855	61,145	776
Redacted	35,000	5,671	29,329	497
Redacted	29,000	22,175	6,825	1942
Redacted	6,000	1,991	4,009	174
Redacted	70,000	44,265	25,735	3877
Redacted	20,300	10,839	9,461	949
Redacted	30,300	12,418	17,882	1088
Redacted	2,600	1,154	1,446	101
Redacted	2,300	1,033	1,267	90



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	70,000	57,238	12,762	5013
Redacted	65,000	33,784	31,216	2959
Redacted	45,134	11,586	33,548	1015
Redacted	40,000	9,884	30,116	866
Redacted	12,000	11,833	167	167
Redacted	57,300	6,703	50,597	587
Redacted	20,000	11,593	8,407	1015
Redacted	70,000	12,092	57,908	1059
Redacted	70,000	13,742	56,258	1204
Redacted	42,000	41,519	481	481
Redacted	7,000	2,721	4,279	238
Redacted	70,000	4,531	65,469	397
Redacted	70,000	38,644	31,356	3385
Redacted	70,000	29,839	40,161	2614
Redacted	11,300	6,964	4,336	610
Redacted	24,500	14,989	9,511	1313
Redacted	30,000	1,129	28,871	99
Redacted	67,000	11,703	55,297	1025
Redacted	25,000	2,790	22,210	244
Redacted	26,100	1,385	24,715	121
Redacted	15,000	2,941	12,059	258
Redacted	14,000	7,654	6,346	670
Redacted	70,000	6,312	63,688	553
Redacted	2,800	975	1,825	85
Redacted	50,000	8,493	41,507	744
Redacted	20,000	3,455	16,545	303
Redacted	70,000	12,950	57,050	1134
Redacted	9,000	1,003	7,997	88
Redacted	70,000	8,855	61,145	776
Redacted	2,500	2,254	246	197
Redacted	70,000	8,240	61,760	722
Redacted	70,000	10,068	59,932	882
Redacted	45,490	7,568	37,922	663
Redacted	70,000	11,037	58,963	967
Redacted	69,999	6,899	63,100	604
Redacted	35,000	25,276	9,724	2214
Redacted	25,000	12,229	12,771	1071
Redacted	35,000	20,188	14,812	1768
Redacted	70,000	38,892	31,108	3406
Redacted	47,750	9,622	38,128	843
Redacted	561	210	351	18
Redacted	12,123	2,515	9,608	220
Redacted	55,000	11,738	43,262	1028
Redacted	70,000	10,524	59,476	922
Redacted	70,000	17,547	52,453	1537
Redacted	70,000	17,547	52,453	1537
Redacted	30,000	7,468	22,532	654
Redacted	8,500	2,186	6,314	191
Redacted	17,200	11,170	6,030	978
Redacted	10,000	6,535	3,465	572



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	300	290	10	10
Redacted	70,000	18,493	51,507	1620
Redacted	50,000	16,539	33,461	1449
Redacted	70,000	13,057	56,943	1144
Redacted	35,000	750	34,250	66
Redacted	65,000	15,678	49,322	1373
Redacted	5,000	1,295	3,705	113
Redacted	70,000	4,883	65,117	428
Redacted	5,000	1,018	3,982	89
Redacted	7,000	3,577	3,423	313
Redacted	70,000	10,575	59,425	926
Redacted	50,000	7,277	42,723	637
Redacted	40,000	20,047	19,953	1756
Redacted	70,000	9,958	60,042	872
Redacted	6,500	2,123	4,377	186
Redacted	70,000	21,162	48,838	1854
Redacted	18,400	11,138	7,262	976
Redacted	70,000	21,662	48,338	1897
Redacted	10,000	595	9,405	52
Redacted	70,000	9,827	60,173	861
Redacted	70,000	1,100	68,900	96
Redacted	25,700	4,816	20,884	422
Redacted	44,300	8,233	36,067	721
Redacted	36,000	6,916	29,084	606
Redacted	70,000	12,975	57,025	1136
Redacted	70,000	12,975	57,025	1136
Redacted	10,000	2,099	7,901	184
Redacted	32,000	8,486	23,514	743
Redacted	38,000	10,057	27,943	881
Redacted	70,000	9,375	60,625	821
Redacted	70,000	61,773	8,227	5411
Redacted	70,000	31,100	38,900	2724
Redacted	70,000	31,100	38,900	2724
Redacted	20,000	11,528	8,472	1010
Redacted	20,130	4,076	16,054	357
Redacted	9,400	1,954	7,446	171
Redacted	26,900	5,413	21,487	474
Redacted	70,000	44,371	25,629	3886
Redacted	54,500	7,869	46,631	689
Redacted	70,000	8,966	61,034	785
Redacted	19,100	3,016	16,084	264
Redacted	50,900	7,873	43,027	690
Redacted	70,000	60,805	9,195	5326
Redacted	40,000	10,573	29,427	926
Redacted	17,600	7,405	10,195	649
Redacted	12,000	5,080	6,920	445
Redacted	48,000	12,045	35,955	1055
Redacted	15,000	2,959	12,041	259
Redacted	8,000	1,624	6,376	142
Redacted	12,500	8,145	4,355	713



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	25,000	13,188	11,812	1155
Redacted	23,170	4,235	18,935	371
Redacted	20,000	9,749	10,251	854
Redacted	35,000	10,071	24,929	882
Redacted	50,148	9,174	40,974	804
Redacted	10,000	1,906	8,094	167
Redacted	6,400	1,256	5,144	110
Redacted	3,459	723	2,736	63
Redacted	920	778	142	68
Redacted	24,000	17,830	6,170	1562
Redacted	3,500	2,683	817	235
Redacted	65,000	11,603	53,397	1016
Redacted	70,000	29,627	40,373	2595
Redacted	70,000	17,407	52,593	1525
Redacted	10,000	6,369	3,631	558
Redacted	62,296	11,157	51,139	977
Redacted	810	241	569	21
Redacted	6,894	1,320	5,574	116
Redacted	40,000	8,933	31,067	782
Redacted	26,200	24,024	2,176	2104
Redacted	10,000	1,059	8,941	93
Redacted	30,000	15,237	14,763	1335
Redacted	65,000	41,744	23,256	3656
Redacted	70,000	10,655	59,345	933
Redacted	70,000	10,577	59,423	926
Redacted	56,700	8,387	48,313	735
Redacted	13,300	2,042	11,258	179
Redacted	50,000	16,127	33,873	1413
Redacted	50,000	16,867	33,133	1477
Redacted	53,800	11,594	42,206	1015
Redacted	70,000	52,398	17,602	4589
Redacted	26,000	1,319	24,681	116
Redacted	70,000	11,740	58,260	1028
Redacted	15,500	2,777	12,723	243
Redacted	70,000	12,973	57,027	1136
Redacted	25,000	4,665	20,335	409
Redacted	45,000	8,320	36,680	729
Redacted	20,000	10,893	9,107	954
Redacted	25,000	13,783	11,217	1207
Redacted	67,870	19,644	48,226	1721
Redacted	40,000	12,941	27,059	1133
Redacted	2,260	401	1,859	35
Redacted	28,900	3,977	24,923	348
Redacted	3,400	2,721	679	238
Redacted	50,000	7,432	42,568	651
Redacted	35,000	6,374	28,626	558
Redacted	27,500	13,323	14,177	1167
Redacted	20,900	7,356	13,544	644
Redacted	5,400	1,972	3,428	173
Redacted	5,300	2,395	2,905	210



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	4,500	1,499	3,001	131
Redacted	500	253	247	22
Redacted	30,100	5,852	24,248	513
Redacted	39,900	7,727	32,173	677
Redacted	70,000	32,182	37,818	2819
Redacted	15,000	11,449	3,551	1003
Redacted	26,500	20,151	6,349	1765
Redacted	37,200	25,210	11,990	2208
Redacted	57,140	8,605	48,535	754
Redacted	9,780	1,554	8,226	136
Redacted	3,080	556	2,524	49
Redacted	50,000	29,201	20,799	2558
Redacted	30,000	10,511	19,489	921
Redacted	66,000	23,697	42,303	2076
Redacted	12,000	8,603	3,397	754
Redacted	2,000	1,516	484	133
Redacted	15,000	7,559	7,441	662
Redacted	600	591	9	9
Redacted	67,000	9,466	57,534	829
Redacted	70,000	44,332	25,668	3883
Redacted	12,500	11,913	587	587
Redacted	70,000	11,975	58,025	1049
Redacted	35,000	5,631	29,369	493
Redacted	70,000	11,598	58,402	1016
Redacted	5,500	1,760	3,740	154
Redacted	70,000	50,460	19,540	4420
Redacted	10,000	961	9,039	84
Redacted	34,790	1,469	33,321	129
Redacted	3,180	222	2,958	19
Redacted	70,000	43,536	26,464	3813
Redacted	70,000	24,598	45,402	2154
Redacted	32,000	2,232	29,768	195
Redacted	18,000	1,297	16,703	114
Redacted	26,600	8,843	17,757	775
Redacted	70,000	51,306	18,694	4494
Redacted	70,000	11,598	58,402	1016
Redacted	70,000	51,070	18,930	4473
Redacted	70,000	11,594	58,406	1015
Redacted	20,000	10,893	9,107	954
Redacted	70,000	11,630	58,370	1019
Redacted	47,500	11,729	35,771	1027
Redacted	70,000	5,069	64,931	444
Redacted	15,100	10,536	4,564	923
Redacted	70,000	10,636	59,364	932
Redacted	70,000	31,702	38,298	2777
Redacted	22,000	1,682	20,318	147
Redacted	6,500	564	5,936	49
Redacted	20,000	1,539	18,461	135
Redacted	10,000	4,234	5,766	371
Redacted	70,000	11,598	58,402	1016



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	70,000	10,522	59,478	922
Redacted	10,000	6,221	3,779	545
Redacted	7,500	4,688	2,812	411
Redacted	23,000	12,875	10,125	1128
Redacted	70,000	10,289	59,711	901
Redacted	70,000	11,712	58,288	1026
Redacted	2,800	2,674	126	126
Redacted	47,010	8,925	38,085	782
Redacted	25,000	9,709	15,291	850
Redacted	50,000	9,091	40,909	796
Redacted	2,000	1,822	178	160
Redacted	800	692	108	61
Redacted	69,200	51,614	17,586	4521
Redacted	70,000	31,211	38,789	2734
Redacted	55,000	7,815	47,185	684
Redacted	50,000	29,998	20,002	2627
Redacted	52,800	9,653	43,147	845
Redacted	41,635	2,967	38,668	260
Redacted	28,101	2,033	26,068	178
Redacted	70,000	33,002	36,998	2891
Redacted	70,000	33,499	36,501	2934
Redacted	43,000	10,839	32,161	949
Redacted	31,000	19,408	11,592	1700
Redacted	698	531	167	47
Redacted	1,500	1,031	469	90
Redacted	31,200	10,322	20,878	904
Redacted	70,000	26,980	43,020	2363
Redacted	70,000	15,204	54,796	1332
Redacted	70,000	11,200	58,800	981
Redacted	33,000	11,056	21,944	968
Redacted	11,000	5,120	5,880	448
Redacted	4,000	1,923	2,077	168
Redacted	5,000	2,380	2,620	208
Redacted	70,000	32,452	37,548	2842
Redacted	3,250	827	2,423	72
Redacted	70,000	12,041	57,959	1055
Redacted	10,000	9,067	933	794
Redacted	70,000	44,858	25,142	3929
Redacted	50,000	10,520	39,480	921
Redacted	25,000	11,685	13,315	1023
Redacted	25,000	10,464	14,536	917
Redacted	40,000	6,134	33,866	537
Redacted	30,000	4,626	25,374	405
Redacted	60,000	31,452	28,548	2755
Redacted	2,250	1,651	599	145
Redacted	12,000	10,998	1,002	963
Redacted	20,000	7,934	12,066	695
Redacted	70,000	32,194	37,806	2820
Redacted	70,000	10,655	59,345	933
Redacted	20,000	3,079	16,921	270



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	31,500	4,794	26,706	420
Redacted	18,500	2,856	15,644	250
Redacted	70,000	6,079	63,921	532
Redacted	25,000	4,819	20,181	422
Redacted	45,000	27,705	17,295	2427
Redacted	14,000	12,362	1,638	1083
Redacted	70,000	57,614	12,386	5046
Redacted	2,000	523	1,477	46
Redacted	50,000	10,747	39,253	941
Redacted	70,000	6,046	63,954	530
Redacted	31,000	9,629	21,371	843
Redacted	70,000	10,116	59,884	886
Redacted	70,000	10,116	59,884	886
Redacted	70,000	18,914	51,086	1657
Redacted	20,000	12,505	7,495	1095
Redacted	18,109	8,622	9,487	755
Redacted	10,000	1,602	8,398	140
Redacted	17,740	9,904	7,836	867
Redacted	17,740	10,122	7,618	887
Redacted	36,600	11,019	25,581	965
Redacted	11,700	3,588	8,112	314
Redacted	16,000	4,871	11,129	427
Redacted	5,700	1,797	3,903	157
Redacted	70,000	29,366	40,634	2572
Redacted	70,000	50,368	19,632	4412
Redacted	70,000	5,909	64,091	518
Redacted	70,000	42,206	27,794	3697
Redacted	70,000	8,877	61,123	778
Redacted	300	215	85	19
Redacted	15,000	9,570	5,430	838
Redacted	40,000	8,953	31,047	784
Redacted	20,000	10,883	9,117	953
Redacted	48,300	14,431	33,869	1264
Redacted	1,450	545	905	48
Redacted	6,000	5,543	457	457
Redacted	70,000	5,934	64,066	520
Redacted	25,000	8,939	16,061	783
Redacted	70,000	20,075	49,925	1758
Redacted	20,000	10,891	9,109	954
Redacted	70,000	35,956	34,044	3149
Redacted	11,000	2,504	8,496	219
Redacted	59,000	13,005	45,995	1139
Redacted	65,000	15,878	49,122	1391
Redacted	70,000	61,082	8,918	5350
Redacted	70,000	12,953	57,047	1135
Redacted	3,500	1,460	2,040	128
Redacted	70,000	8,073	61,927	707
Redacted	70,000	13,310	56,690	1166
Redacted	70,000	23,297	46,703	2041
Redacted	70,000	14,577	55,423	1277



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	35,000	21,190	13,810	1856
Redacted	70,000	6,659	63,341	583
Redacted	60,000	57,029	2,971	2971
Redacted	5,500	3,091	2,409	271
Redacted	70,000	11,711	58,289	1026
Redacted	3,000	762	2,238	67
Redacted	50,000	11,203	38,797	981
Redacted	48,000	28,079	19,921	2459
Redacted	70,000	9,237	60,763	809
Redacted	70,000	5,898	64,102	517
Redacted	70,000	17,169	52,831	1504
Redacted	22,300	20,064	2,236	1757
Redacted	10,000	9,050	950	793
Redacted	35,000	5,671	29,329	497
Redacted	70,000	17,975	52,025	1574
Redacted	63,000	17,214	45,786	1508
Redacted	7,000	1,000	6,000	88
Redacted	63,000	9,321	53,679	816
Redacted	5,000	432	4,568	38
Redacted	70,000	9,186	60,814	805
Redacted	2,500	1,350	1,150	118
Redacted	35,000	26,061	8,939	2283
Redacted	70,000	11,589	58,411	1015
Redacted	4,000	597	3,403	52
Redacted	66,500	42,685	23,815	3739
Redacted	3,000	2,019	981	177
Redacted	500	418	82	37
Redacted	62,500	38,694	23,806	3389
Redacted	70,000	17,613	52,387	1543
Redacted	15,887	1,710	14,177	150
Redacted	550	454	96	40
Redacted	69,450	45,249	24,201	3963
Redacted	54,113	5,592	48,521	490
Redacted	70,000	34,651	35,349	3035
Redacted	70,000	10,148	59,852	889
Redacted	50,000	33,050	16,950	2895
Redacted	35,000	11,037	23,963	967
Redacted	35,000	11,037	23,963	967
Redacted	64,900	10,857	54,043	951
Redacted	5,057	935	4,122	82
Redacted	14,500	7,424	7,076	650
Redacted	15,000	2,262	12,738	198
Redacted	35,000	5,147	29,853	451
Redacted	10,000	8,902	1,098	780
Redacted	40,000	7,657	32,343	671
Redacted	8,500	3,037	5,463	266
Redacted	70,000	6,901	63,099	604
Redacted	24,800	10,699	14,101	937
Redacted	13,000	8,562	4,438	750
Redacted	20,000	7,860	12,140	688



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	70,000	53,598	16,402	4695
Redacted	70,000	21,629	48,371	1894
Redacted	37,000	10,468	26,532	917
Redacted	2,500	765	1,735	67
Redacted	31,000	18,612	12,388	1630
Redacted	70,000	9,177	60,823	804
Redacted	70,000	9,177	60,823	804
Redacted	10,000	9,804	196	196
Redacted	70,000	9,819	60,181	860
Redacted	60,700	15,285	45,415	1339
Redacted	26,000	11,127	14,873	975
Redacted	5,000	1,145	3,855	100
Redacted	70,000	11,640	58,360	1020
Redacted	70,000	21,485	48,515	1882
Redacted	20,000	6,138	13,862	538
Redacted	20,000	6,138	13,862	538
Redacted	12,500	10,764	1,736	943
Redacted	28,000	20,294	7,706	1778
Redacted	52,338	47,946	4,392	4199
Redacted	17,500	16,098	1,402	1403
Redacted	10,000	6,519	3,481	571
Redacted	30,000	12,779	17,221	1119
Redacted	9,000	8,005	995	701
Redacted	40,000	28,611	11,389	2506
Redacted	300	216	84	19
Redacted	70,000	60,923	9,077	5336
Redacted	70,000	4,971	65,029	435
Redacted	60,000	53,519	6,481	4688
Redacted	48,300	8,931	39,369	782
Redacted	70,000	8,942	61,058	783
Redacted	15,000	14,419	581	581
Redacted	70,000	53,864	16,136	4718
Redacted	2,000	1,912	88	88
Redacted	70,000	10,513	59,487	921
Redacted	70,000	13,894	56,106	1217
Redacted	70,000	38,344	31,656	3358
Redacted	70,000	38,344	31,656	3358
Redacted	70,000	38,344	31,656	3358
Redacted	70,000	28,278	41,722	2477
Redacted	70,000	40,961	29,039	3588
Redacted	2,000	973	1,027	85
Redacted	70,000	28,453	41,547	2492
Redacted	15,000	9,178	5,822	804
Redacted	70,000	4,295	65,705	376
Redacted	1,000	587	413	51
Redacted	45,003	11,295	33,708	989
Redacted	1,500	595	905	52
Redacted	70,000	11,978	58,022	1049
Redacted	35,000	11,978	23,022	1049
Redacted	29,000	11,978	17,022	1049



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	70,000	12,875	57,125	1128
Redacted	20,000	11,822	8,178	1035
Redacted	70,000	11,571	58,429	1013
Redacted	35,500	13,528	21,972	1185
Redacted	70,000	10,273	59,727	900
Redacted	12,500	8,899	3,601	779
Redacted	12,500	10,810	1,690	947
Redacted	30,139	12,115	18,024	1061
Redacted	10,691	1,938	8,753	170
Redacted	19,500	7,098	12,402	622
Redacted	35,000	5,631	29,369	493
Redacted	60,150	13,872	46,278	1215
Redacted	34,700	10,560	24,140	925
Redacted	1,600	579	1,021	51
Redacted	2,200	759	1,441	66
Redacted	31,500	9,597	21,903	841
Redacted	70,000	29,433	40,567	2578
Redacted	70,000	10,020	59,980	878
Redacted	70,000	51,373	18,627	4500
Redacted	70,000	43,903	26,097	3845
Redacted	50,000	8,804	41,196	771
Redacted	5,940	1,131	4,809	99
Redacted	60,400	19,660	40,740	1722
Redacted	9,600	3,206	6,394	281
Redacted	25,000	7,613	17,387	667
Redacted	70,000	17,437	52,563	1527
Redacted	35,000	1,373	33,627	120
Redacted	35,000	1,308	33,692	115
Redacted	50,000	17,977	32,023	1575
Redacted	10,000	9,662	338	338
Redacted	9,000	4,570	4,430	400
Redacted	30,000	10,791	19,209	945
Redacted	70,000	32,361	37,639	2834
Redacted	22,300	4,248	18,052	372
Redacted	14,900	2,871	12,029	251
Redacted	10,800	2,107	8,693	185
Redacted	70,000	11,835	58,165	1037
Redacted	70,000	2,160	67,840	189
Redacted	7,000	3,805	3,195	333
Redacted	5,000	2,744	2,256	240
Redacted	2,000	1,157	843	101
Redacted	6,000	3,276	2,724	287
Redacted	70,000	12,346	57,654	1081
Redacted	30,000	10,712	19,288	938
Redacted	30,100	10,319	19,781	904
Redacted	15,000	11,008	3,992	964
Redacted	12,500	12,041	459	459
Redacted	20,000	10,892	9,108	954
Redacted	45,445	37,313	8,132	3268
Redacted	55,499	41,798	13,701	3661



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	65,000	11,884	53,116	1041
Redacted	50,000	8,963	41,037	785
Redacted	25,000	9,614	15,386	842
Redacted	45,000	17,228	27,772	1509
Redacted	70,000	9,140	60,860	801
Redacted	70,000	17,825	52,175	1561
Redacted	47,700	5,097	42,603	446
Redacted	70,000	5,007	64,993	439
Redacted	70,000	45,667	24,333	4000
Redacted	70,000	7,399	62,601	648
Redacted	70,000	23,403	46,597	2050
Redacted	55,000	8,888	46,112	778
Redacted	16,500	927	15,573	81
Redacted	45,000	2,358	42,642	207
Redacted	5,000	1,851	3,149	162
Redacted	3,000	1,150	1,850	101
Redacted	10,123	3,647	6,476	319
Redacted	12,000	4,306	7,694	377
Redacted	40,250	21,143	19,107	1852
Redacted	7,500	910	6,590	80
Redacted	45,000	11,565	33,435	1013
Redacted	25,000	2,105	22,895	184
Redacted	45,000	3,713	41,287	325
Redacted	1,000	952	48	48
Redacted	4,000	2,114	1,886	185
Redacted	20,000	10,524	9,476	922
Redacted	70,000	43,595	26,405	3818
Redacted	20,000	11,347	8,653	994
Redacted	30,000	11,704	18,296	1025
Redacted	70,000	31,595	38,405	2767
Redacted	30,000	11,693	18,307	1024
Redacted	3,000	2,054	946	180
Redacted	70,000	10,548	59,452	924
Redacted	8,500	7,473	1,027	655
Redacted	70,000	27,889	42,111	2443
Redacted	10,000	625	9,375	55
Redacted	50,000	16,107	33,893	1411
Redacted	20,500	6,660	13,840	583
Redacted	6,400	509	5,891	45
Redacted	30,600	2,061	28,539	181
Redacted	21,000	1,444	19,556	126
Redacted	12,000	868	11,132	76
Redacted	15,000	11,668	3,332	1022
Redacted	70,000	9,485	60,515	831
Redacted	70,000	2,335	67,665	205
Redacted	50,000	22,888	27,112	2005
Redacted	20,500	13,939	6,561	1221
Redacted	10,000	2,184	7,816	191
Redacted	70,000	50,908	19,092	4459
Redacted	20,000	9,193	10,807	805



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	40,000	12,875	27,125	1128
Redacted	43,000	6,180	36,820	541
Redacted	7,000	1,088	5,912	95
Redacted	70,000	31,081	38,919	2722
Redacted	41,200	6,659	34,541	583
Redacted	70,000	10,884	59,116	953
Redacted	30,000	21,522	8,478	1885
Redacted	70,000	12,712	57,288	1113
Redacted	16,899	7,620	9,279	667
Redacted	12,495	5,659	6,836	496
Redacted	35,000	6,212	28,788	544
Redacted	70,000	45,566	24,434	3991
Redacted	70,000	7,011	62,989	614
Redacted	21,700	8,911	12,789	780
Redacted	20,000	15,900	4,100	1393
Redacted	70,000	9,084	60,916	796
Redacted	70,000	55,688	14,312	4878
Redacted	70,000	10,655	59,345	933
Redacted	35,000	21,210	13,790	1858
Redacted	70,000	52,050	17,950	4559
Redacted	7,000	663	6,337	58
Redacted	15,000	11,077	3,923	970
Redacted	62,312	9,776	52,536	856
Redacted	7,000	1,023	5,977	90
Redacted	41,000	9,024	31,976	790
Redacted	49,000	44,556	4,444	3903
Redacted	30,000	12,876	17,124	1128
Redacted	70,000	9,210	60,790	807
Redacted	15,000	7,132	7,868	625
Redacted	4,000	1,972	2,028	173
Redacted	60,000	24,323	35,677	2130
Redacted	70,000	52,773	17,227	4622
Redacted	70,000	11,964	58,036	1048
Redacted	70,000	12,132	57,868	1063
Redacted	30,000	8,931	21,069	782
Redacted	50,000	11,395	38,605	998
Redacted	70,000	53,450	16,550	4682
Redacted	55,000	43,078	11,922	3773
Redacted	49,100	28,757	20,343	2519
Redacted	20,000	11,740	8,260	1028
Redacted	70,000	50,118	19,882	4390
Redacted	70,000	50,103	19,897	4388
Redacted	66,000	11,249	54,751	985
Redacted	70,000	27,605	42,395	2418
Redacted	10,000	8,841	1,159	774
Redacted	44,500	10,798	33,702	946
Redacted	12,500	2,971	9,529	260
Redacted	5,000	283	4,717	25
Redacted	30,000	1,210	28,790	106
Redacted	19,000	10,304	8,696	903



Name Line 1	Original Allocation Calculation			New Shares Allocated
	Shares Ordered	Shares Received	Difference	Total #
Redacted	5,000	2,052	2,948	180
Redacted	200	176	24	15
Redacted	7,500	1,077	6,423	94
Redacted	70,000	11,630	58,370	1019
Redacted	70,000	7,963	62,037	697
Redacted	70,000	12,090	57,910	1059
Redacted	10,000	3,654	6,346	320
Redacted	70,000	21,170	48,830	1854
Redacted	30,000	12,876	17,124	1128
Redacted	32,500	8,578	23,922	751
Redacted	3,800	1,089	2,711	95
Redacted	3,700	1,063	2,637	93
Redacted	70,000	10,870	59,130	952
Redacted	70,000	22,828	47,172	1999
Redacted	70,000	27,025	42,975	2367
Redacted	70,000	18,096	51,904	1585
Redacted	70,000	6,199	63,801	543
Redacted	4,000	2,283	1,717	200
Redacted	70,000	12,159	57,841	1065
Redacted	25,000	10,541	14,459	923
Redacted	70,000	17,957	52,043	1573
Redacted	47,711	16,107	31,604	1411
Redacted	12,728	4,368	8,360	383
Redacted	5,528	1,953	3,575	171
Redacted	4,033	1,451	2,582	127
Redacted	70,000	17,682	52,318	1549
Redacted	25,000	16,986	8,014	1488
Redacted	70,000	23,929	46,071	2096
Redacted	50,000	21,154	28,846	1853
Redacted	70,000	29,083	40,917	2547
Redacted	15,000	6,113	8,887	535
Redacted	15,000	6,113	8,887	535
Redacted	70,000	6,798	63,202	595
Redacted	70,000	8,068	61,932	707
<b>Totals</b>	<b>26,783,632</b>	<b>9,198,731</b>	<b>17,584,901</b>	<b>789993</b>