

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
ROCKFORD FUNDING GROUP, LLC,	:	
	:	
Defendants,	:	09 CV 10047 (PGG)
	:	
and	:	
	:	
GENADI YAGODAYEV, BOOKMANN	:	
AGENCY, LLP, HOUSEBERG IMPEX	:	
INC., INFINITA PLUS TRADING, LTD.,	:	
INTERCITY TRANSIT, LTD., MADISA	:	
LTD., MILTON BENFITS, LLP,	:	
PACIFIC GAIN TECHNOLOGIES LTD.,	:	
ROCKFORD INDUSTRY, LTD., STAR	:	
TRADING, INC., SUNRISE IMPORT &	:	
EXPORT INC., and TRASEKS, LTD.,	:	
	:	
Relief Defendant.	:	

**AFFIDAVIT OF CHRISTOPHER AMON IN SUPPORT OF NOTICE OF MOTION,
MOTION AND MEMORANDUM IN SUPPORT OF ORDER FOR DISTRIBUTION
OF SETTLEMENT FUND**

STATE OF MINNESOTA)
) ss.:
COUNTY OF CARVER)

INTRODUCTION

1. I submit this affidavit in support of the Securities and Exchange Commission’s (the “Commission”) Motion for an Order for Distribution of Settlement Fund. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein

and, if called as a witness, I could and would testify competently to the facts set forth in this Affidavit.

2. I am a Project Manager of Analytics Consulting, LLC (“Analytics”), with offices at 18675 Lake Drive East, Chanhassen, Minnesota. Analytics was appointed Distribution Agent per the Order to Appoint a Distribution Agent (“Order”) dated August 1, 2014.

NOTICE CAMPAIGN

3. Pursuant to the Plan of Distribution (“Plan”), Investment in this matter has been identified as the amount deposited with Rockford Funding Group, LLC and/or Relief Defendants from at least March 2009 to November 2009.¹

4. On March 17, 2015, Commission staff provided Analytics with two hundred twelve (212) names and addresses of Potentially Eligible Claimants who were identified as having possible claims to recover from the Net Available Fund under the Distribution Plan. Upon import of these names and addresses, the list was reviewed to identify zero (0) duplicates. On May 12, 2015, a Distribution Plan Notice and Proof of Claim Form (“Notice Packet”) was sent to each of the two hundred twelve (212) records.

5. As a result of this mailing, Analytics received returned mail from the U.S. Postal Service. To date, two (2) Notice Packages were returned with forwarding addresses. These packages were promptly re-mailed to the updated address. To date, ten (10) Notice Packages were returned with no forwarding addresses.

6. Analytics also posted copies of the Plan, Proof of Claim Form and Distribution Plan Notice on the case-specific webpage, www.rockforddistributionfund.com, on or before May 12,

¹ Capitalized terms used herein have the same meaning as in the Plan, except where otherwise defined in this Affidavit.

2015.

7. As of the date of this Affidavit, Analytics has sent a total of two hundred twenty-one (221) Notice Packets to Potentially Eligible Claimants and nominees.

8. Analytics established a toll-free number to accommodate potential claimant inquiries. This toll-free number, (844) 576-1739, became operational on or before May 12, 2015.

PROCEDURES FOLLOWED IN ACCEPTING AND REJECTING CLAIMS

9. Analytics has completed the processing of all claims submitted in this distribution in accordance with the terms of the Plan. The following procedures were used to process the claims and correspondence submitted in this matter:

- a) envelopes received from the Post Office Box specifically designated for this matter as well as claimant submissions via www.rockforddistributionfund.com were opened and sorted into correspondence, such as requests for Claim Forms and actual Claim Forms;
- b) all correspondence received was reviewed and, when appropriate, responded to;
- c) the Claim Forms, together with all documentation submitted therewith, were scanned into a database and each claim was assigned a unique Claim Number, if it did not already have a pre-assigned Claim Number;
- d) the information from each Claim Form, including the Potentially Eligible Claimant's name, address, tax payer identification number or Social Security Number, and every Investment listed on the Claim Form, were entered into a computerized database developed by Analytics for this Action;
- e) the documentation provided in support of each claim was reviewed to ascertain whether the Potentially Eligible Claimant had in fact invested with Rockford Fund

Group during the respective Recovery Periods; and

- f) claims were reviewed for accuracy and to be sure they were not submitted by, or on behalf of, persons excluded from the Class, to the extent that the identities of such person were known to Analytics and through the Potentially Eligible Claimants' certifications on the Claim Forms.

10. A total of three (3) Claims received in this matter were deficient for one or more reasons. Analytics reviewed and handled these deficient claims to ensure that all Potentially Eligible Claimants had a sufficient opportunity to cure deficiencies. Analytics' efforts are outlined below and resulted in the curing of three (3) Claims.

11. If a claim lacked the required information or documentation to substantiate the Potentially Eligible Claimant's transactions during the Relevant Period, or was otherwise deficient,

12. Analytics sent a Claim Deficiency Notice to the Potentially Eligible Claimant advising him, her, or it of the deficiency and requesting the submission of the appropriate documentary evidence to correct the defect(s). The Claim Deficiency Notice advised Potentially Eligible Claimants that the indicated deficiencies must be corrected by a response to the Distribution Agent, and that failure to return a corrected submission with all required supporting documentation would lead to rejection of the claim.

13. Additionally, Potentially Eligible Claimants whose claims were deemed acceptable were sent a notice advising them that they had an Eligible Loss Amount under the Court-approved Plan of Allocation, which set forth the transactions during the Recovery Period deemed eligible, provided the calculated value of their Eligible Loss Amount, and provided them with a mechanism to contest the calculation of their claims. In all instances where Potentially Eligible Claimants had questions regarding the valuation of their claims, Analytics spent the time

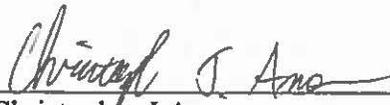
necessary to thoroughly review with them the calculation of the Eligible Loss Amount. Where appropriate, the claim was amended or corrected.

ACCEPTED AND REJECTED CLAIMS

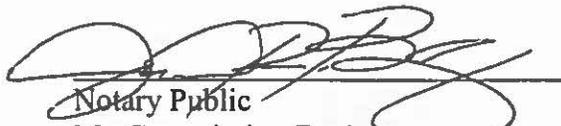
14. Through June 24, 2016, Analytics received a total of one hundred forty-one (141) Claim Forms in connection with the distribution. Analytics has not rejected any claim solely based on its late submission, and no delay has resulted from the processing of these late but otherwise eligible claims due to the time required to process timely-submitted claims. Of the total one hundred forty-one (141) Claim Forms, Analytics has determined that all one hundred forty-one (141) claims are acceptable and have an Eligible Loss Amount when calculated in accordance with the Plan.

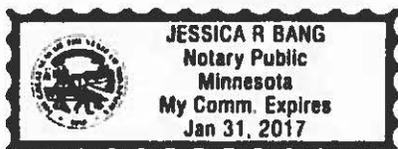
15. Pursuant to Plan Paragraph 35, the Distribution Agent has prepared a final payee list that includes the names of Eligible Claimants and the Eligible Loss Amount of each Eligible Claimant. The Distribution Agent has provided the final payee list to the Commission staff and shall, upon request, be made available to the Court under seal. The aggregate total Eligible Loss Amount of all approved Claims is \$9,440,948.62, the Net Available Settlement Fund is \$919,528.17 and the *pro rata* is calculated to 9.7397%.

Further affiant sayeth not.


Christopher J Amon

Subscribed and sworn to before me
this 30th day of June 2016


Notary Public
My Commission Expires.



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PUBLIC LIST OF DISTRIBUTION

Claim No	Loss Amt	Distribution Check Amt
1000001	\$1,000.00	\$97.40
1000002	\$32,687.50	\$3,183.69
1000003	\$4,750.00	\$462.64
1000005	\$42,687.50	\$4,157.67
1000006	\$67,750.00	\$6,598.70
1000007	\$23,923.75	\$2,330.12
1000008	\$7,600.00	\$740.22
1000010	\$20,825.00	\$2,028.31
1000011	\$98,750.00	\$9,618.04
1000018	\$28,125.00	\$2,739.31
1000021	\$19,625.00	\$1,911.43
1000022	\$203,062.16	\$19,777.82
1000023	\$40,226.77	\$3,918.00
1000025	\$2,862.50	\$278.80
1000026	\$39,000.00	\$3,798.52
1000027	\$96,000.00	\$9,350.19
1000028	\$10,000.00	\$973.98
1000030	\$138,750.00	\$13,513.95
1000031	\$29,000.00	\$2,824.54
1000032	\$4,750.00	\$462.64
1000033	\$140,250.00	\$13,660.05
1000035	\$18,750.00	\$1,826.21
1000036	\$2,000.00	\$194.80
1000037	\$96,312.50	\$9,380.63
1000038	\$4,637.50	\$451.68
1000042	\$12,775.00	\$1,244.26
1000044	\$95,000.00	\$9,252.80
1000045	\$950.00	\$92.53
1000048	\$16,912.50	\$1,647.24
1000049	\$31,875.00	\$3,104.56
1000050	\$19,375.00	\$1,887.08
1000051	\$9,750.00	\$949.63
1000052	\$57,250.00	\$5,576.03
1000057	\$240,312.50	\$23,405.92
1000058	\$9,625.00	\$937.45
1000059	\$937.50	\$91.31
1000060	\$1,000.00	\$97.40

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PUBLIC LIST OF DISTRIBUTION

Claim No	Loss Amt	Distribution Check Amt
1000062	\$79,250.00	\$7,718.78
1000064	\$925.00	\$90.09
1000066	\$1,925.00	\$187.49
1000068	\$9,350.00	\$910.67
1000069	\$243,125.00	\$23,679.85
1000070	\$38,875.00	\$3,786.34
1000072	\$46,875.00	\$4,565.52
1000073	\$48,125.00	\$4,687.27
1000074	\$15,937.50	\$1,552.28
1000080	\$96,250.00	\$9,374.54
1000082	\$1,481.25	\$144.27
1000084	\$48,500.00	\$4,723.80
1000086	\$47,937.50	\$4,669.01
1000087	\$7,725.00	\$752.40
1000088	\$50,000.00	\$4,869.89
1000089	\$48,562.50	\$4,729.88
1000090	\$9,625.00	\$937.45
1000092	\$104,562.50	\$10,184.16
1000095	\$43,312.50	\$4,218.54
1000096	\$75,000.00	\$7,304.84
1000098	\$76,500.00	\$7,450.94
1000100	\$247,983.75	\$24,153.09
1000102	\$463,750.00	\$45,168.25
1000104	\$95,000.00	\$9,252.80
1000112	\$288,500.00	\$28,099.28
1000114	\$11,925.00	\$1,161.47
1000115	\$15,754.80	\$1,534.48
1000117	\$57,975.00	\$5,646.64
1000118	\$20,000.00	\$1,947.96
1000119	\$39,125.00	\$3,810.69
1000120	\$20,000.00	\$1,947.96
1000121	\$16,775.00	\$1,633.85
1000122	\$65,675.00	\$6,396.60
1000123	\$23,437.50	\$2,282.76
1000124	\$273,837.50	\$26,671.18
1000126	\$14,750.00	\$1,436.62
1000129	\$34,000.00	\$3,311.53
1000132	\$15,700.00	\$1,529.15
1000133	\$35,525.00	\$3,460.06

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PUBLIC LIST OF DISTRIBUTION

Claim No	Loss Amt	Distribution Check Amt
1000134	\$98,500.00	\$9,593.69
1000137	\$15,550.00	\$1,514.54
1000138	\$779,375.00	\$75,909.45
1000139	\$24,187.50	\$2,355.81
1000141	\$727,812.50	\$70,887.38
1000142	\$20,000.00	\$1,947.96
1000144	\$10,000.00	\$973.98
1000148	\$48,750.00	\$4,748.15
1000150	\$4,625.00	\$450.47
1000153	\$1,900.00	\$185.06
1000154	\$4,750.00	\$462.64
1000155	\$9,625.00	\$937.45
1000156	\$950.00	\$92.53
1000157	\$8,000.00	\$779.18
1000158	\$2,962.50	\$288.54
1000160	\$9,250.00	\$900.93
1000163	\$3,700.00	\$360.37
1000164	\$23,625.00	\$2,301.02
1000166	\$4,750.00	\$462.64
1000168	\$4,750.00	\$462.64
1000169	\$10,000.00	\$973.98
1000171	\$962.50	\$93.75
1000173	\$4,625.00	\$450.47
1000174	\$52,687.50	\$5,131.65
1000175	\$10,000.00	\$973.98
1000177	\$101,812.50	\$9,916.32
1000179	\$105,375.00	\$10,263.30
1000181	\$5,625.00	\$547.86
1000182	\$50,775.00	\$4,945.38
1000183	\$19,375.00	\$1,887.08
1000185	\$962.50	\$93.75
1000186	\$7,981.25	\$777.36
1000189	\$30,737.50	\$2,993.77
1000190	\$89,937.50	\$8,759.72
1000191	\$10,000.00	\$973.98
1000194	\$4,850.00	\$472.38
1000195	\$214,912.50	\$20,932.02
1000196	\$143,812.50	\$14,007.03
1000198	\$4,675.00	\$455.33

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PUBLIC LIST OF DISTRIBUTION

Claim No	Loss Amt	Distribution Check Amt
1000199	\$242,250.00	\$23,594.63
1000203	\$50,000.00	\$4,869.89
1000204	\$7,375.00	\$718.31
1000205	\$79,000.00	\$7,694.43
1000206	\$937.50	\$91.31
1000212	\$37,625.00	\$3,664.59
1000215	\$4,875.00	\$474.81
1000216	\$295,500.00	\$28,781.07
1000219	\$484,175.00	\$47,157.61
1000220	\$395,466.94	\$38,517.63
1000221	\$15,983.78	\$1,556.79
1000222	\$159,650.00	\$15,549.57
1000223	\$14,700.00	\$1,431.75
1000224	\$5,000.00	\$486.99
1000225	\$50,000.00	\$4,869.89
1000226	\$116,082.92	\$11,306.23
1000227	\$3,581.67	\$348.85
1000228	\$26,063.21	\$2,538.50
1000229	\$106,164.26	\$10,340.17
1000230	\$21,829.61	\$2,126.16
1000231	\$962.50	\$93.75
1000232	\$48,500.00	\$4,723.80
1000233	\$49,375.00	\$4,809.02
1000234	\$4,750.00	\$462.64
1000235	\$3,825.00	\$372.55
1000236	\$42,462.50	\$4,135.76
TOTAL	\$9,440,948.62	\$919,528.17