



Upon the Receiver's completion of all steps set forth in paragraph 36 of this Plan, and after the Tax Administrator has had the opportunity to examine the Fund as transferred, the Final Receiver Accounting, and the declaration, all in conjunction with this Plan, the Tax Administrator shall pay or reserve the Fund Expenses as described herein. At the same time, if the Tax Administrator determines such payment to safely fall within the amount that the Estate Professionals will receive under this Plan, the Tax Administrator may distribute \$100,000 to the law firm of Pietragallo Gordon Alfano Bosick & Raspanti, LLP, and that law firm shall be responsible for allocating the payment between and among the Estate Professionals in accordance with an agreement among those professionals or court order. Any amount distributed to the Estate Professionals in accordance with this paragraph will be offset, dollar for dollar, from the Estate Professionals Payment described above, paragraph 34, with the remainder to be distributed in accordance with paragraph 34 after the Commission's filing of the Final Distribution Schedule.

By electronic mail dated March 9, 2015, counsel for the Receiver confirmed acceptance of this change.

Wherefore, the Commission respectfully requests that the Court enter the proposed Order accompanying this memorandum, approving the Amended Plan and appointing a Tax Administrator.

Dated: March 10, 2015

Respectfully submitted,

s/ Catherine E. Pappas  
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