



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
DENVER REGIONAL OFFICE
1961 STOUT STREET
SUITE 1700
DENVER, COLORADO 80294-1961
PHONE: (303) 844-1000

September 2, 2014

TO: Investors with Bernard H. Butts Jr., Fotios Geivelis Jr., also known as Frank Anastasio, Worldwide Funding III Limited LLC, Douglas J. Anisky, Sidney Banner, Express Commercial Capital LLC, James Baggs, Bernard H. Butts, Jr. P.A., Butts Holding Corporation, Margaret A. Hering, Global Worldwide Funding Ventures, Inc., and PW Consulting Group LLC

FROM: Ms. Leslie J. Hughes, Attorney for the Securities and Exchange Commission

SUBJECT: (1) NOTICE OF DISTRIBUTION PLAN IN SEC v. Butts, et al., Case No. 13-cv-23115-CIV-Martinez (S.D. Fla.)

(2) NOTICE OF CLAIM BAR DATE: **SEPTEMBER 30, 2014**

Dear Investors:

On August 29, 2013, the United States Securities and Exchange Commission (the "Commission") filed a civil lawsuit against Bernard H. Butts Jr. ("Butts"), Fotios Geivelis Jr., also known as Frank Anastasio ("Geivelis"), Worldwide Funding III Limited LLC, Douglas J. Anisky, Sidney Banner, Express Commercial Capital LLC, James Baggs, Bernard H. Butts, Jr. P.A. ("Butts PA"), Butts Holding Corporation ("Butts Holding"), Margaret A. Hering ("Hering"), Global Worldwide Funding Ventures, Inc. ("Global Ventures"), and PW Consulting Group LLC (referred to collectively as the "Worldwide Funding Entities"). The complaint alleged the defendants made false statements that, among other things, Worldwide Funding III Limited LLC ("Worldwide Funding") or Global Worldwide Funding Ventures, Inc. ("Global Ventures") had the ability to acquire Standby Letters of Credit ("SBLC") for investment in a trading program, investors' funds were held in an escrow account until a SBLC was acquired, and that large returns were to be paid to investors. Without admitting or denying the Commission's allegations, Butts, Butts PA and Butts Holding, and Hering settled the civil lawsuit and agreed to pay disgorgement, prejudgment interest, and penalties totaling \$3,951,696.

The Commission has filed with the United States District Court for the Southern District of Florida a Distribution Plan containing procedures which allow you to present to the Commission's attorney, Ms. Leslie J. Hughes, a claim for losses which you believe you have suffered in connection with your investments with the Worldwide Funding Entities as [art pf the SBLC trading program.

This letter contains important information regarding how you can submit your claim against the Worldwide Funding Entities and includes a Notice of the "Claim Bar Date" which is an important deadline for the submission of your claim.

Filing Proof of Claim

Based on bank and other records obtained during the investigation, the Commission's attorney has identified potential investors who transferred funds to the Worldwide Funding Entities for investment in the SBLC trading program, which investors are identified as Pre-Qualified Claimants.

As a **Pre-Qualified Claimant**, you must submit a Proof of Claim form along with supporting documents to the Commission's attorney by **September 30, 2014**, the Claims Bar Date. A copy of the Proof of Claim form and Exhibit A containing your proposed Net Claims Loss as calculated by the Commission's attorney is enclosed. If you agree with the calculation of your Net Claim of Loss, then you may mark and initial the box in Item 2.A of the Proof of Claim form, sign the document, and send it along with your tax identification form and supporting bank documents to the Commission's attorney. If you disagree with the Net Claim of Loss amount provided in Exhibit A, then you must complete Items 2.B, 2.C and 2.D on the Proof of Claim form to show your calculation of the Net Claim of Loss amount, and submit copies of wire transfer receipts and bank statements which prove your payment to, and investment with, the Worldwide Funding Entities. Copies of the provider agreement issued by the Worldwide Funding Entities will **NOT** be accepted as sufficient proof of the amount of your investment. You must sign the Proof of Claim containing your calculation of the Net Claim of Loss, and submit it with your tax identification form and supporting documents to the Distribution Agent. The Proof of Claim form must be completed and signed by each person making the claim.

All **Pre-Qualified Claimants** that want to file a claim must deliver the fully-completed Proof of Claim form and supporting documents including a tax identification form to Ms. Leslie J. Hughes, Securities and Exchange Commission, 1961 Stout Street, Suite 1700, Denver, Colorado 80294-1961, or by email to WorldwideFundingFairFund@sec.gov or by fax to 303-297-3529, which must be received by **September 30, 2014**. If you fail to submit your Proof of Claim form by that date, then your claim will be barred.

In addition, the Securities and Exchange Commission is posting this information on its website at <http://www.sec.gov/divisions/enforce/claims.htm> under the name "Worldwide Funding III Limited LLC" to identify any Potentially Eligible Claimants who were not previously identified as a Pre-Qualified Claimant. Any **Potentially Eligible Claimant** that wants to file a claim must request a Proof of Claim form from the Distribution Agent by sending a request to Ms. Leslie J. Hughes, Securities and Exchange Commission, 1961 Stout Street, Suite 1700, Denver, Colorado 80294-1961, or by email to WorldwideFundingFairFund@sec.gov on or before **September 30, 2014**. If a Potentially Eligible Claimant fails to request of Proof of Claim form by September 30, 2014, then the claim may be barred.

The Commission's attorney will review all Proof of Claim forms submitted by each Pre-Qualified Claimant and each Potentially Eligible Claimant, and if a claim is deficient in whole or in part, she will send a Claim Deficiency Notice setting forth the reason or reasons why the claim is deficient. Any Pre-Qualified Claimant and Potentially Eligible Claimant who has received a Claim

Deficiency Notice shall have 30 days from the date of the Claim Deficiency Notice to cure any identified deficiencies.

This claim procedure enables each of you to present to the Court your Net Claim of Loss resulting from investments that you made with the Worldwide Funding Entities between April 1, 2012, and August 30, 2013, to acquire Standby Letters of Credit for investment in a trading program. The Court and Commission's attorney will not know how much money will be payable to each Claimant until completion of the claims process and they cannot comment on the amount of potential distribution to each Potential Claim until the Court has approved a Claims Report about all filed and unfiled potential claims. The Court will make the final determination regarding the validity and amount of your claim based upon the information in your Proof of Claim and the supporting documents. The Court has expressed its concern that fairness be accorded among and between the many investors. You must inform us whether you received any money from Worldwide Funding Entities for any reason.

Net Claim of Loss

The amount of your Net Claim of Loss in your Proof of Claim will be calculated based on the records of the banks and the defendants by deducting from the amount of your total investment, any and all money you received from Worldwide Funding Entities, including but not limited to (a) "returns on investment", including interest, (b) refund received from any of the defendants, and (c) any other money recovered, for any reason, from or through Worldwide Funding or the others defendants. **This information must be included in your Proof of Claim and any information provided will be compared to bank records and other documents obtained by the Commission during this litigation.**

Execution of Proof of Claim Under Penalty of Perjury

You and all persons submitting a claim with you *must* sign the Proof of Claim as a declaration under penalty of perjury. The declaration must include your representations about: (a) the amount of your total investments; (b) whether you received any amount of money and, if so, the amount you received from any source as a return of, or on account of your investment (regardless how such payment was labeled or characterized, in writing or verbally).

NOTICE OF CLAIMS BAR DATE.

THIS LETTER CONSTITUTES NOTICE ("Claims Bar Date Notice") THAT PRE-QUALIFIED CLAIMANT MUST SUBMIT THE FULLY COMPLETED AND SIGNED Proof of Claim THAT IS POSTMARKED OR DELIVERED BY E-MAIL ON OR BEFORE SEPTEMBER 30, 2014, and actually received by the Commission's attorney, in order for your claim to be deemed "filed."

IF A PRE-QUALIFIED CLAIMANT FAILS TO DELIVER A COMPLETED PROOF OF CLAIM, SIGNED UNDER PENALTY OF PERJURY, POSTMARKED OR DELIVERED BY E-MAIL ON OR BEFORE SEPTEMBER 30, 2014 (“CLAIMS BAR DATE”), THE CLAIM MAY BE REJECTED.

THIS LETTER CONSTITUTES NOTICE (“Claims Bar Date Notice”) THAT POTENTIALLY ELIGIBLE CLAIMANTS MUST SUBMIT A REQUEST FOR THE SIGNED Proof of Claim THAT IS POSTMARKED OR E-MAILED ON OR BEFORE SEPTEMBER 30, 2014, and actually received by the Distribution Agent, in order for your claim to be deemed “filed.” ALL POTENTIALLY ELIGIBLE CLAIMANTS MUST SUBMIT THE FULLY COMPLETED AND SIGNED Proof of Claim THAT IS POSTMARKED OR DELIVERED BY E-MAIL ON OR BEFORE OCTOBER 30, 2014, and actually received by the Distribution Agent, in order for your claim to be deemed “filed.”

Confidential Information Required

A **Social Security Number (SSN), Federal Employer Identification Number (FEIN), or Tax Identification Number (TIN)** is required for each Claimant and is an absolute condition to a distribution to any person signing the Proof of Claim. This information will be held by the Distribution Agent in confidence, subject to further Court orders. Foreign persons or companies must submit a United States Internal Revenue Form W-8Ben for individuals or Form W-8BenE for entities.

CONSENT TO JURISDICTION OF THE COURT

By filing a Proof of Claim with the Commission’s attorney, you agree that the Court shall have jurisdiction over all claims identified in your Proof of Claim and over all aspects of your claims, including but not limited to: (a) your right to any money from the above-named defendants, if any is available; (b) the priority of the claim(s), if any, in the distribution; (c) scheduling and allocation of the funds available to satisfy your claims (if any are available); and (d) that all objections and disputes to the allowance of your claim by the Commission’s attorney, shall be submitted to and be the subject of review by the Court for final ruling based upon motion practice to be decided without a jury. You must file and submit any and all objections and disputes you may have regarding your claim pursuant to federal motion practice for a hearing and a final ruling thereon. The matter will be heard by the Court sitting without a jury.

AVAILABLE CLAIM FORMS

A Proof of Claim form accompanies this Bar Date Notice and if you are a Pre-Qualified Claimant it is accompanied by an Exhibit A. These documents are also available from the Distribution Agent at her office, or by email: WorldwideFundingFairFund@sec.gov .

Questions about the procedures above may be submitted in writing to the Distribution Agent at WorldwideFundingFairFund@sec.gov. Thank you for your cooperation.