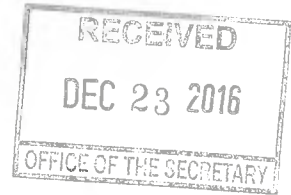


COPY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of

BIOELECTRONICS CORPORATION,
IBEX, LLC,
ST. JOHN'S, LLC,
ANDREW J. WHELAN,
KELLY A. WHELAN, AND
ROBERT P. BEDWELL,

Respondents.

File No. 3-17104

POST-HEARING DECLARATION OF BRIAN FLOOD IN SUPPORT OF
RESPONDENTS' MOTION TO CORRECT MANIFEST ERRORS OF FACT IN
INITIAL DECISION DATED DECEMBER 13, 2016

I, BRIAN FLOOD, DECLARE AS FOLLOWS:

1. I have personal knowledge of the facts stated herein and if called on would and could testify competently thereto.

2. I submit this declaration in support of the motion of Respondents Bioelectronics Corporation (“BIEL”), Ibex, LLC (“IBEX”), St. John’s, LLC (“St. John’s”), Andrew J. Whelan and Kelly A. Whelan (collectively, “Respondents”)¹, to correct the Initial Decision published by this Court on December 13, 2016 in the above-referenced case (the “Initial Decision”).

3. Attached hereto at **Exhibit 1** is a spreadsheet reflecting the profits made by IBEX with respect to each of the sales listed therein. The numbers used were taken from the work that I completed for the hearing in this matter, organized by me to address the Court’s computation of profits made by IBEX on such transactions.

4. To the extent that I did not have information readily available to me, I received such information from Kelly Whelan, such as her tax rate on the profits earned by IBEX in these transactions. However, much of the data used for this chart was already in the record of transactions used at the hearing on this matter before the Court.

5. I did nothing to audit the books and records of BioElectronics, including the books giving rise to the numbers stated herein. Nevertheless, they are true and accurate to the best of my knowledge.

6. Counsel for the Respondents asked me to make the computation in a way that both showed and eliminated the IBEX securities sales that were completed on or before April 17, 2010. I did so. I believe the numbers set forth in Exhibit 1 hereto fairly and accurately depict the results of the sales transactions at issue in this action.

¹ All Respondents excluding only Robert P. Bedwell.

7. Assuming the information provided to me by Kelly Whelan, DX 1 and the records available to me in preparing my report for the Court, and using only the transactions within the 5-year statute of limitations (due to tolling agreements, after April 17, 2010), the total of IBEX profits is only \$462,532. See *Id.* The reconciliation to Initial Decision at Exhibit 1, I believe, fairly and accurately reflects the adjustments that would need to be made to the Court's computation in order to accurately calculate IBEX's profits from BIEL transactions between April, 17, 2010 and the end of the relevant period in this case, as determined by the More Definitive Statement.

8. The bulk of the \$1,580,593 computed by the Court was based on pre-April 17, 2010 transactions outside of the statute of limitations. Of that amount, \$631,686 should be excluded as arising from transactions outside of the statute of limitations period, net of 15% capital gains taxes addressed separately. An additional \$259,291 should be reduced, because the notes sold included lawful interest accrued on the debt converted or sold (which should be offset against profits). Finally, \$193,096 should be reduced from the disgorgement amount because that amount constitutes 15% of the profits of such sales – which amount, according to Kelly Whelan, has already been paid by IBEX based on capital gains taxes.

9. If the Court does not limit its disgorgement computation to the transactions within the statute of limitations period, the profits would be \$1,094,220. The offset for interest of the notes converted and sold would be \$259,291 and the offset for capital gains taxes paid would be \$193,096. *Id.*

10. Below are my responses to the Court's comments about my testimony in the Initial Decision.

Statement in Initial Decision: “Flood admitted that he was not aware that the Revolver was created in 2009 even though it was dated January 1, 2005, but stated that this fact would not have affected his analysis”.

11. This statement implies that my awareness of the date of the creation of the Revolver loan documentation was lacking and that such fact is something that I should have known and was incompetent for not knowing. I testified that my services as an outside accountant working, indirectly, for BioElectronics, began in March 2013, while the Revolver loan had been documented in 2009, at the latest, four years earlier, and fully eight years after some of the loans reflected in that Revolver loan documentation were made. RX 1C and 1D; RT 1140-1142. I had nothing whatsoever to do with such documentation. Nor did I testify that I audited the books and records of BioElectronics. It is not the least bit surprising, and does not impugn my testimony, that I was unaware of when such loan had been documented four years before my arrival.

12. While the date that the Revolver was documented was not important to my holding period analysis, it was important to my analysis to track each loan payment made to its original documentation in BioElectronics’ books and records. All loans under the Revolver agreement included in my analysis were matched by date to the BioElectronics accounting records. The reason that I stated that when the actual document was created would not have affected my analysis, was not out of some level of carelessness, but instead because I understood that for the purpose of calculating the holding periods for each IBEX note that was subsequently converted to shares or sold, it simply did not matter when the Revolver loan documentation had been created. What mattered was when the loans were actually funded, not when the loan document was signed.

13. Page 30

Statement in Initial Decision: “Flood also admitted that he did not consider the ‘holding period’ definition found in the Securities Act”.

14. I did testify that I did not consider the ‘holding period’ definition found in the Securities Act. RT 1136. But, I did also testify about exactly how I computed the holding periods. In fact, I used the United States Internal Revenue Service definition of holding period at 26 USC §1223, which for convertible debt includes the time from initial date of the loan to the company until the debt is converted, in addition to the time in which it is subsequently sold.

15. Page 30

Statement in Initial Decision: “Flood explained that he excluded an August 1, 2009, loan for approximately \$519,000 because he believed that the loan was not sold between 2010 and 2014”.

16. I was asked about a note that was not included in my holding period spreadsheet at Exhibit DX 1. I correctly testified that the note was never sold. I did not include the note in his holding period analysis, because that note was not sold – and thus was not part of the Division’s case. The Division was suing based on specific note sales detailed in its More Definitive Statement. The \$519,920 note was never sold and, accordingly, the note was not at issue in this case, other than for purposes of discussing issues of control by IBEX, as the note was secured by the assets of BIEL. Consequently, its holding period was not relevant to my work. Accordingly, it was not analyzed among the notes at issue in the case as to its holding period – and properly so.

17. Page 45

Statement in Initial Decision: “The \$530,037 note is an especially troubling example, because it does not appear to have been contemporaneously documented at all”.

16. The \$530,037 loan was a transfer of debt from St. John's to IBEX. IBEX paid St. John's for that loan the full face amount of the debt transferred (\$530,037). RT 1216 (testimony of Kelly Whelan). When the assignment of such debt was booked by BIEL, it was simply a journal entry substituting IBEX in place of St. John's as the holder of such pre-existing debt. That debt was sold years later as part of the debt sold by IBEX. The sales are part of this case, as the \$530,037 constitutes the last of the Revolver note additions, and thus treated by me as the last of the Revolver debt sold. *Id.*

17. **Page 45:**

Statement in Initial Decision: "Flood, who has been handling BIEL's accounting for years and claimed to be familiar with its finances, was unaware that the Revolver had been back-dated, and that the \$530,037 note had not actually been executed in August 2009." P. 45.

18. As explained above, because I did not start services until 2013, it is unreasonable to assume that I would have known that a document dated in the year 2005 was not actually prepared until 2009, four years before he initiated services. As explained above, that information was irrelevant to my holding period analysis.

19. **Page 46**

Statement in Initial Decision: "BIEL seemingly made no such posting for the \$530,037 loan, except to note that it had been assigned to IBEX".

20. Not true. BioElectronics recorded the full value of the \$530,037 loan in the general ledger, as reviewed by me and as I previously noted was part of the December 2010 debt included in the stated footnote disclosure of the \$1,287,954 balance of the Revolver. BioElectronics carried forward on its books this debt until it was sold between February 7, 2014 and April 1, 2014.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that it was made this 22nd day of December 2016 in Arnold Maryland.

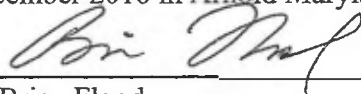
By: 
Brian Flood

EXHIBIT 1

IBEX																
Loans Converted and Shares Then Sold, and Loans Sold Directly 2010-2014																
Original Loan Date	Loan Amount	RX-1A Page #	Date Ranges of Sales From To		Loan Balance Converted (with Interest)	Loan Balance Sold	Loans Converted & Sold including Interest	Notes	Sale Price of Shares Sold	Sale Price of Notes Sold	Total Sale Proceeds	Calculated Profits	Capital Gains Tax @ 15%	Net After-Tax Profit(Loss)	Aggregate After-Tax Profits	% of Aggregate Profits
01/31/2008	\$ 65,748	1	1/27/10	7/26/10	\$ 74,899	\$ -	\$ 74,899		\$ 893,000		\$ 893,000	\$ 818,101	\$ 122,715	\$ 695,386	\$ 695,386	
01/31/2008		1	1/27/10	4/15/10	\$ (69,840)		\$ (69,840)	(1)	\$ (813,000)		\$ (813,000)	\$ (743,160)	\$ (111,474)	\$ (631,686)	\$ 63,700	14%
02/06/2008	\$ 10,000	1	7/26/10	9/13/10	\$ 11,168	\$ -	\$ 11,168		\$ 74,223		\$ 74,223	\$ 63,055	\$ 9,458	\$ 53,597	\$ 117,297	25%
03/13/2008	\$ 7,500	1	9/13/10	10/6/10	\$ 8,324	\$ -	\$ 8,324		\$ 69,368		\$ 69,368	\$ 61,044	\$ 9,157	\$ 51,887	\$ 169,184	37%
04/04/2008	\$ 8,200	1	10/6/10	10/29/10	\$ 9,067	\$ -	\$ 9,067		\$ 40,982		\$ 40,982	\$ 31,915	\$ 4,787	\$ 27,128	\$ 196,313	42%
05/20/2008	\$ 15,000	1	10/29/10	11/5/10	\$ 17,284	\$ -	\$ 17,284		\$ 72,017		\$ 72,017	\$ 54,733	\$ 8,210	\$ 46,523	\$ 242,835	53%
06/16/2008	\$ 15,000	2	11/5/10	1/27/11	\$ 17,206	\$ -	\$ 17,206		\$ 97,063		\$ 97,063	\$ 79,857	\$ 11,978	\$ 67,879	\$ 310,714	67%
06/20/2008	\$ 15,000	2	1/27/11	2/1/11	\$ 17,511	\$ -	\$ 17,511		\$ 116,743		\$ 116,743	\$ 99,232	\$ 14,885	\$ 84,347	\$ 395,061	85%
06/30/2008	\$ 54,037	2	2/1/11	6/16/11	\$ 61,841	\$ -	\$ 61,841		\$ 151,604		\$ 151,604	\$ 89,763	\$ 13,465	\$ 76,298	\$ 471,359	102%
07/31/2008	\$ 35,625	2	1/23/13	1/23/13	\$ 40,360	\$ -	\$ 23,660		\$ 19,716		\$ 19,716	\$ (3,944)	\$ (592)	\$ (3,352)	\$ 468,007	101%
							\$ 16,700	(2)				\$ -	\$ -	\$ -	\$ 468,007	101%
08/12/2008	\$ 10,000	2, 4	1/23/13	3/5/13	\$ 6,340	\$ 5,513	\$ 11,853		\$ 5,284	\$ 5,513	\$ 10,797	\$ (1,056)	\$ (158)	\$ (898)	\$ 467,109	101%
08/29/2008	\$ 40,000	4	3/5/13	3/5/13		\$ 49,195	\$ 49,195			\$ 49,195	\$ 49,195	\$ -	\$ -	\$ -	\$ 467,109	101%
09/16/2008	\$ 35,000	3, 4	3/5/13	4/23/13	\$ 25,000	\$ 9,708	\$ 9,708		\$ -	\$ 9,708	\$ 9,708	\$ (0)	\$ -	\$ (0)	\$ 467,109	101%
							\$ 25,000	(3)				\$ -	\$ -	\$ -	\$ 467,109	101%
09/16/2008	\$ 27,500	4	4/23/13	4/23/13		\$ 34,145	\$ 34,145		\$ 34,145	\$ 34,145	\$ -	\$ -	\$ -	\$ -	\$ 467,109	101%
10/01/2008	\$ 9,250	3, 4	5/3/13	5/3/13	\$ 10,352	\$ 1,105	\$ 11,457		\$ 10,335	\$ 1,105	\$ 11,440	\$ (17)	\$ (3)	\$ (14)	\$ 467,095	101%
10/01/2008	\$ 23,500	3	5/3/13	5/3/13	\$ 29,162	\$ -	\$ 29,162		\$ 29,114	\$ -	\$ 29,114	\$ (48)	\$ (7)	\$ (41)	\$ 467,054	101%
10/01/2008	\$ 12,000	3, 4	5/3/13	5/15/13	\$ 10,486	\$ 4,064	\$ 14,550		\$ 10,469	\$ 4,064	\$ 14,533	\$ (17)	\$ (3)	\$ (14)	\$ 467,040	101%
10/01/2008	\$ 16,894	4	4/23/13	5/3/13		\$ 20,939	\$ 20,939		\$ 20,939	\$ 20,939	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/01/2008	\$ 2,982	4	5/3/13	5/3/13		\$ 3,700	\$ 3,700		\$ 3,700	\$ 3,700	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/01/2008	\$ 10,000	4	5/3/13	5/3/13		\$ 12,409	\$ 12,409		\$ 12,409	\$ 12,409	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/01/2008	\$ 6,250	4	5/3/13	5/3/13		\$ 7,756	\$ 7,756		\$ 7,756	\$ 7,756	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/01/2008	\$ 8,250	4	5/3/13	5/3/13		\$ 10,238	\$ 10,238		\$ 10,238	\$ 10,238	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/03/2008	\$ 24,000	4	5/15/13	5/15/13		\$ 29,817	\$ 29,817		\$ 29,817	\$ 29,817	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/10/2008	\$ 8,000	4	5/15/13	5/15/13		\$ 9,931	\$ 9,931		\$ 9,931	\$ 9,931	\$ -	\$ -	\$ -	\$ -	\$ 467,040	101%
10/21/2008	\$ 11,700	3, 4	5/15/13	5/21/13	\$ 6,198	\$ 7,998	\$ 14,196		\$ 6,188	\$ 7,998	\$ 14,186	\$ (10)	\$ (2)	\$ (8)	\$ 467,032	101%
10/22/2008	\$ 5,000	3	5/21/13	5/21/13	\$ 6,067	\$ -	\$ 6,067		\$ 6,057	\$ -	\$ 6,057	\$ (10)	\$ (2)	\$ (8)	\$ 467,024	101%
10/24/2008	\$ 11,700	3	5/21/13	5/21/13	\$ 14,197	\$ -	\$ 14,197		\$ 14,174	\$ -	\$ 14,174	\$ (23)	\$ (3)	\$ (20)	\$ 467,004	101%
10/28/2008	\$ 5,000	3	5/21/13	5/21/13	\$ 6,067	\$ -	\$ 6,067		\$ 6,057	\$ -	\$ 6,057	\$ (10)	\$ (2)	\$ (8)	\$ 466,996	101%
11/03/2008	\$ 9,600	3	5/21/13	5/21/13	\$ 11,649	\$ -	\$ 11,649		\$ 11,630	\$ -	\$ 11,630	\$ (19)	\$ (3)	\$ (16)	\$ 466,980	101%
11/18/2008	\$ 5,000	3	5/21/13	5/21/13	\$ 6,067	\$ -	\$ 6,067		\$ 5,813	\$ -	\$ 5,813	\$ (254)	\$ (38)	\$ (216)	\$ 466,764	101%
11/30/2008	\$ 4,100	3	5/23/13	5/23/13	\$ 4,976	\$ -	\$ 4,976		\$ -	\$ -	\$ -	\$ (4,976)	\$ (746)	\$ (4,230)	\$ 462,534	100%
12/12/2008	\$ 40,000	3, 4	5/23/13	5/23/13	\$ 24,779	\$ 25,762	\$ 25,762		\$ -	\$ 25,762	\$ 25,762	\$ -	\$ -	\$ -	\$ 462,534	100%
							\$ 24,779	(4)				\$ -	\$ -	\$ -	\$ 462,534	100%
12/15/2008	\$ 10,000	4	5/31/13	5/31/13		\$ 12,342	\$ 12,342		\$ 12,342	\$ 12,342	\$ -	\$ -	\$ -	\$ -	\$ 462,534	100%
12/16/2008	\$ 800	4	5/31/13	5/31/13		\$ 987	\$ 987		\$ 987	\$ 987	\$ -	\$ -	\$ -	\$ -	\$ 462,534	100%
03/10/2009	\$ 20,000	4	5/31/13	5/31/13		\$ 24,439	\$ 24,439		\$ 24,439	\$ 24,439	\$ -	\$ -	\$ -	\$ -	\$ 462,534	100%
03/13/2009	\$ 10,000	3, 4	5/31/13	9/26/13	\$ 745	\$ 11,470	\$ 12,215		\$ 745	\$ 11,470	\$ 12,215	\$ -	\$ -	\$ -	\$ 462,534	100%
03/17/2009	\$ 20,000	3	9/26/13	9/26/13	\$ 24,758	\$ -	\$ 24,758		\$ 24,758	\$ -	\$ 24,758	\$ (0)	\$ -	\$ (0)	\$ 462,533	100%
03/23/2009	\$ 18,000	3	9/26/13	9/26/13	\$ 22,267	\$ -	\$ 22,267		\$ 22,267	\$ -	\$ 22,267	\$ 0	\$ -	\$ 0	\$ 462,534	100%
03/23/2009	\$ 15,000	3	9/26/13	10/11/13	\$ 2,230	\$ -	\$ 2,230		\$ 2,230	\$ -	\$ 2,230	\$ 0	\$ -	\$ 0	\$ 462,534	100%
03/25/2009	\$ 5,000	5	10/11/13	10/11/13		\$ 6,195	\$ 6,195		\$ 6,195	\$ 6,195	\$ -	\$ -	\$ -	\$ -	\$ 462,534	100%

IBEX																
Loans Converted and Shares Then Sold, and Loans Sold Directly 2010-2014																
Original Loan Date	Loan Amount	RX-1A Page #	Date Ranges of Sales From To		Loan Balance Converted (with Interest)	Loan Balance Sold	Loans Converted & Sold including Interest	Notes	Sale Price of Shares Sold	Sale Price of Notes Sold	Total Sale Proceeds	Calculated Profits	Capital Gains Tax @ 15%	Net After-Tax Profit(Loss)	Aggregate After-Tax Profits	% of Aggregate Profits
04/03/2009	\$ 6,400	5	10/11/13	10/17/13	\$ 7,920	\$ 7,920			\$ 7,920	\$ 7,920	\$ -	\$ -	\$ -	\$ 462,534	100%	
04/03/2009	\$ 5,000	5	10/17/13	10/17/13	\$ 6,192	\$ 6,192			\$ 6,192	\$ 6,192	\$ -	\$ -	\$ -	\$ 462,534	100%	
04/08/2009	\$ 25,000	5	10/17/13	10/17/13	\$ 30,944	\$ 30,944			\$ 30,944	\$ 30,944	\$ -	\$ -	\$ -	\$ 462,534	100%	
04/21/2009	\$ 6,000	5	10/17/13	10/17/13	\$ 7,390	\$ 7,390			\$ 7,390	\$ 7,390	\$ -	\$ -	\$ -	\$ 462,534	100%	
05/07/2009	\$ 15,960	5	11/6/13	11/6/13	\$ 19,705	\$ 19,705			\$ 19,705	\$ 19,705	\$ -	\$ -	\$ -	\$ 462,534	100%	
05/12/2009	\$ 28,000	5	11/6/13	12/26/13	\$ 35,965	\$ 35,965			\$ 35,965	\$ 35,965	\$ -	\$ -	\$ -	\$ 462,534	100%	
05/18/2009	\$ 25,000	5	12/26/13	1/6/14	\$ 31,051	\$ 31,051			\$ 31,051	\$ 31,051	\$ -	\$ -	\$ -	\$ 462,534	100%	
06/02/2009	\$ 4,055	5	1/6/14	1/6/14	\$ 5,043	\$ 5,043			\$ 5,043	\$ 5,043	\$ -	\$ -	\$ -	\$ 462,534	100%	
06/03/2009	\$ 35,000	5	1/6/14	1/23/14	\$ 43,544	\$ 43,544			\$ 43,544	\$ 43,544	\$ -	\$ -	\$ -	\$ 462,534	100%	
06/08/2009	\$ 25,000	6	1/23/14	1/29/14	\$ 31,154	\$ 31,154			\$ 31,154	\$ 31,154	\$ -	\$ -	\$ -	\$ 462,534	100%	
06/10/2009	\$ 10,000	6	1/29/14	2/7/14	\$ 12,437	\$ 12,437			\$ 12,437	\$ 12,437	\$ -	\$ -	\$ -	\$ 462,534	100%	
08/31/2009	\$ 530,037	6	2/7/14	4/1/14	\$ 656,396	\$ 656,396			\$ 656,396	\$ 656,396	\$ -	\$ -	\$ -	\$ 462,534	100%	
03/31/2010	\$ 310,000	7	6/11/14	8/13/14	\$ 300,000	\$ 300,000			\$ 300,000	\$ 300,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
05/05/2010	\$ 120,000	7	4/30/14	5/5/14	\$ 120,000	\$ 120,000			\$ 120,000	\$ 120,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
05/14/2010	\$ 100,000	7	4/22/14	4/25/14	\$ 100,000	\$ 100,000			\$ 100,000	\$ 100,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
06/22/2010	\$ 130,000	7	4/2/14	4/2/14	\$ 130,000	\$ 130,000			\$ 130,000	\$ 130,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
07/15/2010	\$ 10,000	7	9/15/12	9/15/12	\$ 11,734	\$ 11,734			\$ 11,734	\$ 11,734	\$ -	\$ -	\$ -	\$ 462,534	100%	
07/23/2010	\$ 100,000	7	8/21/14	8/27/14	\$ 100,000	\$ 100,000			\$ 100,000	\$ 100,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
09/07/2010	\$ 50,000	7	9/25/14	9/25/14	\$ 50,000	\$ 50,000			\$ 50,000	\$ 50,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
10/04/2010	\$ 50,000	7	3/18/14	3/31/14	\$ 50,000	\$ 50,000			\$ 50,000	\$ 50,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
10/08/2010	\$ 50,000	7	6/9/14	6/9/14	\$ 64,685	\$ 64,685			\$ 64,685	\$ 64,685	\$ -	\$ -	\$ -	\$ 462,534	100%	
11/04/2010	\$ 40,000	7	2/5/13	2/5/13	\$ 47,554	\$ 47,554			\$ 47,554	\$ 47,554	\$ -	\$ -	\$ -	\$ 462,534	100%	
11/15/2010	\$ 50,000	7	11/14/14	11/14/14	\$ 50,000	\$ 50,000			\$ 50,000	\$ 50,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
12/06/2010	\$ 78,333	7	3/26/13	3/26/13	\$ 93,451	\$ 93,451			\$ 93,451	\$ 93,451	\$ -	\$ -	\$ -	\$ 462,534	100%	
12/16/2010	\$ 30,000	7	2/5/13	2/5/13	\$ 35,429	\$ 35,429			\$ 35,429	\$ 35,429	\$ -	\$ -	\$ -	\$ 462,534	100%	
02/02/2011	\$ 125,000	7	5/14/14	5/28/14	\$ 125,000	\$ 125,000			\$ 125,000	\$ 125,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
02/14/2011	\$ 62,000	7	6/3/14	9/29/69	\$ 62,000	\$ 62,000			\$ 62,000	\$ 62,000	\$ -	\$ -	\$ -	\$ 462,534	100%	
07/28/2011	\$ 60,000	7	9/9/14	9/9/14	\$ 76,245	\$ 76,245			\$ 76,245	\$ 76,245	\$ -	\$ -	\$ -	\$ 462,534	100%	
	\$ 2,731,420				\$ 399,160	\$ 2,591,551	\$ 2,990,711		\$ 876,837	\$ 2,591,552	\$ 3,468,389	\$ 544,166	\$ 81,622	\$ 462,534		
Notes																
(1) Backing out all sales that occurred prior to 4/17/10 (see attached schedule of excerpt from Exhibit RX-1A).																
(2) This portion of the \$35,625 loan was converted into shares that were given to Lauren Jarman, and no loss from this transaction is reflected for this analysis.																
(3) This portion of the \$35,000 loan was converted into shares that were given to Old Menachem Jewish Center, and no loss from this transaction is included in this analysis.																
(4) This portion of the \$40,000 loan was converted into shares that were used in lieu of expenses, so no loss from this transaction is included in this analysis.																
Reconciliation to Initial Decision Disbursement Amount:																
IBEX Disbursement per Initial Decision \$ 1,580,593																
After-Tax Impact of Pre 4/17/10 Sales \$ (631,686)																
Credit for Capital Gains Tax Paid \$ (193,096)																
Accrued interest on loans at time of sale \$ (259,291)																
Other differences \$ (33,986)																
Corrected IBEX Amount \$ 462,534																

