

IN THE CIRCUIT COURT FOR ST. JOHNS COUNTY,
FLORIDA PROBATE DIVISION

IN RE: ESTATE OF File No. CP10-0375

KENNETH W. McLEOD

Deceased.

PETITION FOR DISCHARGE

Petitioner, Michael I. Goldberg, as Curator of the above estate, alleges:

1. The decedent, Kenneth W. McLeod, a resident of St. Johns County, Florida, died on June 22, 2010, and Letters of Administration were issued to petitioner on September 3, 2010.

2. Petitioner files herewith a First and Final Accounting of Curator containing a complete report of all cash and property transactions and of all receipts and disbursements since the commencement of administration of this estate.

3. Petitioner has fully administered this estate by making payment, settlement, or other disposition of all claims and debts that were presented, and by paying or making provision for the payment of all taxes and expenses of administration.

4. Petitioner has filed all required estate tax returns with the Internal Revenue Service and has obtained and filed with this court evidence of the satisfaction of this estate's obligations for federal estate taxes, if any.

5. The amount of compensation paid or to be paid to the curator, attorneys, accountants, appraisers, or other agents employed by the curator, and the manner of determining that compensation, is set forth in Exhibit A attached hereto.

6. Petitioner has made or proposes to make distribution of the assets of this estate as reflected in the plan of distribution set forth in the schedule attached hereto as Exhibit B.

7. The only persons, other than petitioner, having an interest in this proceeding and their respective addresses are shown on attached Exhibit C.

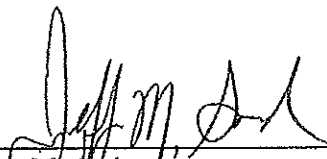
8. Any objections to the Petition for Discharge, the First and Final Accounting of Curator, the compensation paid or proposed to be paid, or the proposed distribution of assets, must be filed and served within 30 days from the date of service of the last of the Petition for Discharge or Final Accounting. Within 90 days after filing of the objection, a notice of hearing thereon must be served, or the objection is abandoned.

9. Objections, if any, shall be in writing and shall state with particularity the item or items to which the objection is directed and the grounds on which the objection is based.

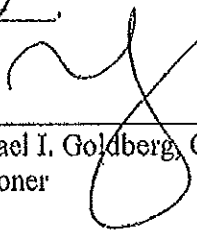
Petitioner requests that, after satisfactory proof has been presented that distribution has been made in accordance with the schedule of distribution and that claims of creditors have been paid or otherwise disposed of, an order be entered discharging petitioner as personal representative of this estate and releasing the surety on any bond which petitioner may have posted in this proceeding from any further liability on it.

Under penalties of perjury, I declare that I have read the foregoing, and the facts alleged are true, to the best of my knowledge and belief.

Signed on January 2, 2014.



Jeffrey M. Gad
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Michael I. Goldberg, Curator
Petitioner

EXHIBIT A
TO
PETITION FOR DISCHARGE

The amount of compensation paid to the attorneys for the Curator is:

| | |
|--------------------|--------------|
| Akerman Senterfitt | \$44,943.64* |
|--------------------|--------------|

*As outlined in many court filings, this estate stems from extraordinary circumstances and has been challenging to administer due to many legal and administrative matters that are interconnected with the Receivership Proceedings. Since his appointment, the Curator has incurred attorneys' fees and costs for the preparation of the petition and related documents to open and administer the estate and comply with probate procedures. The Curator identified investors who invested with the Decedent's companies to apprise them of the nature of these proceedings and the fraud which has been perpetrated against them. The Curator analyzed and reviewed a total of 133 claims filed by creditors and responded to numerous inquiries. The Curator was also charged with the coordination of the transfer of claims to the Receivership Court, and worked to settle legal disputes with Decedent's spouse which had a material effect on the assets available for distribution. Moreover, the Curator was required to identify, locate and secure personal assets, sell assets, and make determinations on whether various assets should be abandoned. The Curator also worked with accountants to analyze potential tax assets and file tax returns. Due to the overlapping nature of the Probate and Receivership Proceedings, the Curator as Receiver also sought to identify, locate, and secure the Receivership Entities' records; identify claims and develop legal theories for recovery against parties whose actions may have caused injury to the Receivership Entities and their victims; and assist federal and state authorities in their finalization of their investigation into the Defendants' fraudulent conduct. The Receiver also established a toll-free investor hotline at 1-800-223-2234 to keep victims informed as to the progress of the Receivership and Probate proceedings and created a website at www.febginfo.com to advise investors of developments in the case.

EXHIBIT B
TO
PETITION FOR DISCHARGE

Petitioner has made or proposes to make a 2.78% pro-rata distribution allocated to creditor payments that were determined as follows:

| <u>Creditor</u> | <u>Claim Amount</u> | <u>Percentage</u> | <u>Pro-Rata Share</u> |
|------------------------------------|---------------------|-------------------|-----------------------|
| Bank of America | \$ 38,744.68 | 4.63% | \$ 1,076.73 |
| San Jose Country Club | \$ 13,162.54 | 1.57% | \$ 365.79 |
| Summer Beach II Community Assn. | \$ 1,144.95 | 0.14% | \$ 31.82 |
| Wells Fargo Bank, N.A. | \$783,157.15 | 93.66% | \$21,764.26 |