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*Attorneys for the Receiver for Defendants*  
*AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;*  
*AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS*  
*CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT*  
*MANAGEMENT, LLC*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;  
AEQUITAS HOLDINGS, LLC;  
AEQUITAS COMMERCIAL FINANCE,  
LLC; AEQUITAS CAPITAL  
MANAGEMENT, INC.; AEQUITAS  
INVESTMENT MANAGEMENT, LLC;  
ROBERT J. JESENİK, BRIAN A. OLIVER;  
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

DECLARATION OF TROY D.  
GREENFIELD IN SUPPORT OF THE  
RECEIVER'S MOTION FOR ORDER (1)  
APPROVING COMPROMISES OF  
CLAIMS, (2) AUTHORIZING  
PERFORMANCE OF SETTLEMENT  
AGREEMENTS, AND (3) AUTHORIZING  
DISBURSEMENT OF FUNDS HELD IN A  
SEGREGATED ACCOUNT (DKT. NO. 980)



I, Troy D. Greenfield declare as follows:

1. I am over 18 years of age and otherwise competent to testify. I make this declaration in support of the Receiver's Motion for Order (1) Approving Compromise of Claims, (2) Authorizing Performance of Settlement Agreements, and (3) Releasing the Balance of Funds from the Segregated Account for the Benefit of the Defrauded Investors (Dkt. No. 980).
2. Attached hereto as Exhibit 1 is a true and accurate copy of a Memorandum of Action of corporate entity Express Aviation Acquisition Corporation, as provided by counsel for the Liquidating Trustee.
3. Attached hereto as Exhibit 2 is a true and accurate copy of an Assignment of Membership Interests in TRD Consulting Services, LLC, as provided by counsel for the Liquidating Trustee.
4. Attached hereto as Exhibit 3 is a true and accurate copy of the relevant portion of the ASFG bankruptcy schedules.
5. Between July 2011 and May 2014, Aequitas transferred \$14,885,844.75 to ASFG and TRD. Based on the books and records of the Receivership, TRD received the vast majority of those funds - \$10,764,454.27.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

Dated this 23rd day of June, 2022.

/s/ Troy Greenfield  
Troy D. Greenfield

**MEMORANDUM OF ACTION OF SOLE SHAREHOLDER  
TAKEN WITHOUT A MEETING IN LIEU OF  
ANNUAL MEETING**

**EFFECTIVE AS OF JUNE 1, 2014**

The undersigned, the sole shareholder of Express Aviation Acquisition Corporation, a Nevada corporation (“the Corporation”), acting pursuant to Article II, Section 2.21 of the bylaws of the Corporation and in accordance with Nevada Revised Statutes, Title 2, Chapter 78, Section 78.320(2), does hereby adopt the following resolutions without an annual meeting of the shareholder effective as of June 1, 2014:

**NOW THEREFORE, BE IT:**

**RESOLVED**, that the number of Directors of the Corporation shall be one (1).

**RESOLVED FURTHER**, that Timothy R. Duoos is hereby appointed as the sole director of the Corporation to serve until his successor(s) is/are elected and qualified subject to his earlier disqualification, resignation, or removal.

**RESOLVED FURTHER**, that the actions of the officers and the sole director of the Corporation during the last fiscal year ending December 31, 2013 are hereby ratified and approved in all respects.

**RESOLVED FURTHER**, that any officer of the Corporation is authorized, directed and empowered to execute and deliver any other document and/or instrument which may be necessary or desirable to effectuate the purposes of the foregoing resolutions.

**IN WITNESS WHEREOF**, the undersigned has executed this written action effective as of the effective date set forth above.

The Duoos 2004 Trust, an inter-vivos trust dated  
May 11, 2004



Timothy R. Duoos, Co-Trustee

**Assignment of Membership Interests In**

**TRD Consulting Services, LLC**

Timothy R. Duoos and Lynn M. Duoos, Co Trustees of THE DUOOS 2004 TRUST

**Percentage of Ownership – 60%**

314 Harbor View Lane

Largo, FL 33770

Tyler Duoos

**Percentage of Ownership – 20%**

118 39<sup>th</sup> Street

Newport Beach, CA 92663

Christine Duoos

**Percentage of Ownership – 20%**

314 Harbor View Lane

Largo, FL 33770

Debtor Tango Delta Financial, Inc.  
Name

Case number (If known) 8:20-bk-03672

Current value of debtor's interest

71.	<b>Notes receivable</b> Description (include name of obligor)	
72.	<b>Tax refunds and unused net operating losses (NOLs)</b> Description (for example, federal, state, local)	
73.	<b>Interests in insurance policies or annuities</b>	
74.	<b>Causes of action against third parties (whether or not a lawsuit has been filed)</b> <b>Aequitas Management, LLC</b> <b>3:16-cv-004387-JR</b> <b>Writ of Attachment</b>	<b>\$2,483,403.38</b>
	Nature of claim	
	Amount requested	<b>\$0.00</b>
	<b>Aequitas Managment, LLC</b> <b>Money Owed</b>	<b>Unknown</b>
	Nature of claim	
	Amount requested	<b>\$0.00</b>
	<b>John Patrick Lowe, TTEE</b> <b>Pulman, Cappuccio &amp; Pullen, LLP</b>	<b>Unknown</b>
	Nature of claim	<b>Nuisance Litigation, Defamation</b>
	Amount requested	<b>\$0.00</b>
	<b>Lawrence Earle</b> <b>Career Point College</b> <b>Edudyne Systems Inc.</b>	<b>Unknown</b>
	Nature of claim	<b>Fraud</b>
	Amount requested	<b>\$0.00</b>
	<b>Dade Medical</b>	<b>Unknown</b>
	Nature of claim	
	Amount requested	<b>\$0.00</b>
	<b>In re Dickinson of San Antonio, Inc.</b> <b>16-52492-rbk</b> <b>Proof of Claim No. 223</b>	<b>Unknown</b>
	Nature of claim	
	Amount requested	<b>\$11,748,564.00</b>
	<b>Cindy Shoffstall</b> <b>13522 Pueblo Springs Dr</b> <b>San Antonio, TX 78232</b>	<b>Unknown</b>
	Nature of claim	<b>Fraud</b>
	Amount requested	<b>\$0.00</b>

Debtor **Tango Delta Financial, Inc.**Case number (if known) **8:20-bk-03672**

29. Within 1 year before the filing of this case, did the debtor have officers, directors, managing members, general partners, members in control of the debtor, or shareholders in control of the debtor who no longer hold these positions?

- No  
 Yes. Identify below.

30. **Payments, distributions, or withdrawals credited or given to insiders**

Within 1 year before filing this case, did the debtor provide an insider with value in any form, including salary, other compensation, draws, bonuses, loans, credits on loans, stock redemptions, and options exercised?

- No  
 Yes. Identify below.

Name and address of recipient	Amount of money or description and value of property	Dates	Reason for providing the value
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31. Within 6 years before filing this case, has the debtor been a member of any consolidated group for tax purposes?

- No  
 Yes. Identify below.

Name of the parent corporation	Employer Identification number of the parent corporation
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32. Within 6 years before filing this case, has the debtor as an employer been responsible for contributing to a pension fund?

- No  
 Yes. Identify below.

Name of the pension fund	Employer Identification number of the parent corporation
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#### Part 14: Signature and Declaration

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

I have examined the information in this *Statement of Financial Affairs* and any attachments and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **June 3, 2020**

**/s/ Timothy R. Duoos**  
 Signature of individual signing on behalf of the debtor

**Timothy R. Duoos**  
 Printed name

Position or relationship to debtor **President**

Are additional pages to *Statement of Financial Affairs for Non-Individuals Filing for Bankruptcy (Official Form 207)* attached?

- No  
 Yes