UNITED STATED DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff, Case no. 19-cv-1028-40LRH

vs.

FIRST CHOICE HORIZON LLC, et al.,

Defendants.
_____/

RECEIVER'S NOTICE OF IDENTIFYING
ADDITIONAL RECEIVERSHIP ENTITY (BAVIC REALTY CORP.)

Mark J. Bernet (the "Receiver"), as receiver for First Choice Horizon LLC, First Southern Trust LLC, First United Mutual LLC, Premier Union Trust LLC, d/b/a Second Choice Horizon, South Premier Trust LLC, Suncoast Mutual LLC, United Choice Plus LLC, Southern Pride LLC, Financial Service Trust LLC, Southern Choice LLC, and Sun Premier LLC (collectively the "Receivership Defendants"), hereby declares the following non-party to be an additional "Receivership Entity" within the meaning of the Court's June 26, 2019 Stipulated Preliminary Injunction:

- Bavic Realty Corp.

Under the Court's June 26 2019 Stipulated Preliminary Injunction, the Receiver is appointed as receiver for the "Receivership Entities," a term defined to include the named Receivership Defendants, plus

> any other entity that has conducted any business related to the marketing, promotion, offering for sale, or sale of Defendants' credit card interest rate reduction service, including receipt of Assets derived from any activity that is the subject of the Complaint in this matter, and that the Receiver determines is controlled or owned by any Defendant.

TRO, pp. 6-7.

The Receiver has learned that Bavic Realty Corp. received assets from the Defendants, and that such funds derived from activity that is the subject of the Amended Complaint herein. Further, the Receiver has discovered that the Defendant Guerrero owns and controls Bavic Realty Corp.[1]

The Receiver will proceed with administering Bavic Realty Corp. as one of the Receivership Entities under the Court's Preliminary Injunction.

/s/ Mark J. Bernet, Receiver
Mark J. Bernet, Receiver
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[1] Guerrero failed to identify his ownership of Bavic Realty Corp. on his financial disclosure form. He also failed to disclose that Bavic Realty Corp. owns a parcel of real property located in the Bronx, New York, that is under contract for sale for $3.45 million. The Receiver may choose to implement contempt proceedings as a consequence of Guerrero's decision to provide false and incomplete financial statements.

CERTIFICATE OF SERVICE

I certify that on March 24, 2020, a copy of the foregoing was served by e-mail to Michael A. Boutros, Esquire, and Robin Rock, Esquire, Attorneys for Plaintiff, Federal Trade Commission, 225 Peachtree Street, N.E., Suite 1500, Atlanta, Georgia 30303, e-mail: mboutros@ftc.gov and mboutros@ftc.gov, and to Robert D. Eckard, Esquire, and Beth Ann Tobey, Esquire, Law Office of Robert Eckard and Associates, P.A., 3110 Palm Harbor Blvd., North, Palm Harbor, Florida 34683, e-mail robert@roberteckardlaw.com, bethann@roberteckardlaw.com.

/s/ Mark J. Bernet
Mark J. Bernet, Receiver