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THE BOARD of DISCIPLINARY APPEALS
Appointed by the Supreme Court of Texas

No. 64651

BEFORE THE
BOARD OF DISCIPLINARY APPEALS

MARIO A. MATA
STATE BAR OF TEXAS CARD NO. 13184400
Respondent/Appellant

V

COMMISSION FOR LAWYER DISCIPLINE
OF THE STATE BAR OF TEXAS
Petitioner/Appellee

Appeal from the Judgment of the District 9 Evidentiary Panel,
Evidentiary Panel 9-1 in File No. 201800134

BRIEF OF APPELLEE

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STATEMENT AS TO ORAL ARGUMENT

Appellant has requested oral argument. Appellee does not believe oral argument will assist the Board in making its decisions. However, should the Board grant oral argument to Appellant, Appellee request the opportunity to appear and argue.

ABBREVIATIONS

"App." will refer to Appendix.

"App. BR" followed by the page number are references to appellants' brief.

Appellant, Mario A. Mata, will be referred to as "Appellant" or "Mata".

Appellee, the "Commission for Lawyer Discipline" will be referred to as "Appellee" or "the Commission."

CR will refer to the Clerk's Record.

RR will refer to the Reporter's Record.

Tex. R. Disc. Proc. references the Texas Rules of Disciplinary Procedure.

TDRPC refers to Texas Disciplinary Rules of Professional Conduct.

T.R.C.P. references the Texas Rules of Civil Procedure.

TABLE OF CONTENTS

PAGE

INDEX OF AUTHORITIES

CASES PAGE

STATUTES AND RULES PAGE

APPENDIX

1. Judgment of Disbarment, March 10, 2020, CR. 393.
2. Moser Grievance Filed January 2, 2018, RR. 44-45, Pet. Ex. 6. (*See* also, as to Pet. Ex. 6, Appellant's Motion to Supplement, June 25, 2021, Attachment #1.)
3. Moser's $270,000 Check Payable to Mata's IOLTA Trust Account, August 9, 2013, RR. 38, Pet. Ex. 3.
4. Deposit Slip from Mata's IOLTA Trust Account For $270,000 Check, August 9, 2013, RR. 39, Pet. Ex. 4.
5. Vontobel Bank Statements, December 31, 2013, RR. 40, Pet. Ex. 5. (*See* also, as to Pet. Ex. 5, Appellant's Motion to Supplement, June 25, 2021, Attachment #2.)
6. Mata IOLTA Account Bank Records and Statements, RR. 88-89, Pet. Ex. 7, 8.

STATEMENT OF THE CASE

Type of Proceeding: Attorney Discipline

Petitioner/Appellee: The Commission for Lawyer Discipline

Respondent/Appellant: Mario A. Mata

Nature of the Case: The Commission for Lawyer Discipline brought a disciplinary action against Mata regarding professional misconduct in violation of Texas Disciplinary Rules of Professional Conduct 1.14(b).

Disposition: The Judgment of the District 9 Evidentiary Panel, Evidentiary Panel 9-1 in File No. 201800134 rendered a Judgment of Disbarment dated March 10, 2020; (Appendix 1), (CR. 393).

TO THE HONORABLE BOARD OF DISCIPLINARY APPEALS:

Comes now, Appellee, the Commission for Lawyer Discipline (Commission) and files this its Appellee's Brief in this case. Appellee respectfully shows the Board of Disciplinary Appeals as follows:

I. SUMMARY OF THE ARGUMENT

Appellant Mata has brought this appeal contesting a Judgment of Disbarment rendered against him on March 10, 2020.[1] An Evidentiary Panel for District 9-1, State Bar of Texas, concluded Appellant, Mario A. Mata, violated TDRPC 1.14(b) by his failure to render an accounting for $270,000 that was deposited in Appellant's IOLTA trust account in confidence for his client, Joel A. Moser. Also, Appellant never returned to his client any of the $270,000.

The Commission brought this case against the Appellant stemming from Mata's representation of Moser in setting up an international trust, the Joel A. Moser Family Trust, and registering the trust in the Cook Islands. As part of that representation, on August 9, 2013, Moser delivered a check for $270,000 payable to Mata's trust account in order that Mata would transfer that sum to Moser's offshore asset protection trust in the Cook Islands. Appellant deposited that check into the Appellant's IOLTA account. However, Appellant failed to transfer any of that $270,000 to Moser's trust in the Cook Islands. In fact, the record shows, Appellant appropriated for his own personal use all of the $270,000 entrusted

[1] App. 1, Judgment of Disbarment, March 10, 2020, CR. 393.

to him by Moser. As noted above, no part of that sum has been refunded to Moser nor did Appellant render and accounting as required by TDRPC 1.14(b).

In his brief, Appellant claims that pursuant to Rule 17.06, TRDP,[2] the four year statute of limitations barred prosecution of the disciplinary action brought by the Commission[3] and the Judgment of Disbarment must be reversed, rendered, and dismissed. However, Appellant did not raise the statute of limitations in any pleadings filed in the action brought by the Commission, nor did he make any statement on the record in the disciplinary proceeding to identify or give any notice of his alleged statute of limitations defense. Accordingly, Appellant has failed to preserve error. There is nothing for the Board to review. Never the less, assuming without agreeing the statute of limitations is at issue, the record shows Moser's grievance was filed within the four year statute of limitations period and the claim is not barred.

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[2] Appellant incorrectly cites former TRDP 15.06. However, the applicable rule is TRDP 17.06, renumbered from Rule 15.06 effective June 21, 2018. "Rule 17.06 Limitations, General Rule and Exceptions, A. General Rule: No attorney may be disciplined for Professional Misconduct that occurred more than four years before the date on which a Grievance alleging the Professional Misconduct is received by the Chief Disciplinary Counsel."

[3] The pages in Appellant's brief are not numbered. His three issues appear on the sixth page from the cover page.

II. PRELIMINARY STATEMENT: APPELLANT HAS FAILED TO PRESERVE HIS POINT ON APPEAL.

A. No Preservation of the Defense of Statute of Limitations.

Appellant contends that the four year statute of limitations on grievances filed against attorneys bars the action brought against Appellant. However, Appellant did not raise the statute of limitations in any pleadings filed in the action brought by the Commission, nor did he make any statement on the record in the disciplinary proceed to identify or give any notice of his alleged statute of limitations defense. Further, Appellant does not provide any record citations in his brief. Accordingly, Appellant has failed to preserve error.

The case of *Beard v. Comm'n for Lawyer Discipline*[4] makes it very clear that the statute of limitations, as an affirmative defense in lawyer disciplinary actions, must be pleaded or it is "waived."[5] Appellant cannot avoid that rule and accordingly cannot raise the statute of limitations issue. Further, in any event, the total absence of any citations to the record waives appellate review of his case. [6]

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[4] *Beard v. Comm'n for Lawyer Discipline*, 279 S.W.3d 895, 899-900 (Tex. App.-Dallas 2009, pet. denied.).

[5] *Id.* ("Rule 94 of the Texas Rules of Civil Procedure provides, "In pleading to a preceding pleading, a party shall set forth affirmatively . . . statute of limitations . . . and any other matter constituting an avoidance or affirmative defense." TEX. R. CIV. P. 94. Limitations is an affirmative defense that is waived if not pleaded. *G.R.A.V.I.T.Y. Enters., Inc. v. Reece Supply Co.*, 177 S.W.3d 537, 544 (Tex. App.--Dallas 2005, no pet.).").

[6] *Keyes Helium Co. v. Regency Gas Servs., L.P.*, 393 S.W.3d 858, 861-62 (Tex. App.—Dallas 2012, no pet.) (holding failure to cite to relevant portions of record waives appellate review); *Lares v. Flores*, 2015 Tex. App. LEXIS 1290 *2, 5-6 (Tex. App.-San Antonio 2015, pet denied); *Castro v. Castro*, 2015 Tex. App. LEXIS 12681 *3-4 (Tex. App.-San Antonio 2015, pet. denied), (We have neither a duty nor a right to perform an independent review of the record and the applicable law to determine if there was error.").

Appellant asserts that it is the Commission's burden to bring to the attention of the trier of fact that Appellant has failed to assert his affirmative defense of statute of limitations.[7] He cites the case of *Roark v. Stallworth Oil & Gas*,[8] for this proposition. However, the *Roark* case says nothing of the kind. This is what the Supreme Court actually held,

> "A party relying on an affirmative defense must specifically plead the defense and, when the defense is based on a claim enumerated in rule 93, must verify the pleading by affidavit. Tex. R. Civ. P. 93, 94. A properly pleaded affirmative defense, supported by uncontroverted summary judgment evidence, may serve as the basis for a summary judgment."[9]

Unlike in *Roark*, there was no summary judgment practice involved here, nor, in this case was there any hint in the record that appellant was asserting an affirmative defense of any kind.

B. No Trial by Consent.

Additionally, Appellant claims the Commission tried the issue of statute of limitations by "consent" by allegedly "failing to raise the lack of pleading before submission of the case."[10] For that proposition, Appellant cites *Harrington v. Aetna Casualty & Surety Co.*[11] The *Harrington* case decision is based on the express provisions of T.R.C.P. 67, which states,

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[7] App. Br. 8-9 (The pages of Appellant's brief are not numbered. Pages numbers have been designate based upon the number of pages in the brief starting with the cover page as page number one.).
[8] *Roark v. Stallworth Oil & Gas*, 813 S.W.2d 492 (Tex. 1991).
[9] *Id*.
[10] App. Br. 8-9.
[11] *Harrington v. Aetna Casualty & Surety Co.*, 489 S.W.2d 171(Tex. App.-Waco 1972, writ ref'd. n.r.e.).

> "*When issues not raised by the pleadings are tried by express or implied consent of the parties, they shall be treated in all respects as if they had been raised in the pleadings.* In such case such amendment of the pleadings as may be necessary to cause them to conform to the evidence and to raise these issues may be made by leave of court upon motion of any party at any time up to the submission of the case to the Court or jury, but failure so to amend shall not affect the result of the trial of these issues; provided that written pleadings, before the time of submission, shall be necessary to the submission of questions, as is provided in Rules 277 and 279."[12] (Emphasis added).

As the Tyler Court of Appeals concluded in the *Pine Trail Shores Owners' Ass'n v. Aiken* case, trial by consent is determined by whether the record shows a "defensive issue is not properly pleaded but is brought before the trial court by the active assistance of both parties . . . ."[13] Further, that same court of appeals directed this guideline for evaluating whether there had been trial of an issue by consent, "To determine whether an issue was tried by consent, we must review the record not for evidence of the issue, but rather for evidence of trial of the issue."[14]

In the *Aiken* case, the court of appeals concluded the issue of the Association's authority to raise assessments was argued and evidence presented to the trial court. However, the defendant specifically objected to the Association's lack of authority. The trial judge overruled that objection, but informed the parties that she would "'consider [his] legal argument as to what effect, if any, what they're talking about has on their obligations.

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[12] T.R.C.P. 67 "Amendments to Conform to Issues Tried Without Objection."
[13] *Pine Trail Shores Owners' Ass'n v. Aiken*, 160 S.W.3d 139, 146 (Tex. App.-Tyler 2005, no pet.).
[14] *Holden v. Holden*, 456 S.W.3d 642, 651 (Tex. App.-Tyler 2015, no pet.).

We'll take that up later.'"[15] The Association then resumed its presentation of testimony relating to the amended bylaws and its authority thereunder. After closing arguments, the trial court requested briefs on the issue of authority. It was not until that time that the Association informed the trial court that no defendant had pleaded lack of authority. The Court of Appeals concluded there was trial by consent as to the authority of the Association and ruled that trial by consent occurs "when evidence on the issue is developed under circumstances indicating both parties understood the issue was in the case."[16]

In this case, nothing in the record shows there was any kind of interaction between the Commission, Appellant, and the Panel regarding the issue of the statute of limitations. Appellant certainly has not cited anything about that in record. The Panel had no way of knowing what was in Appellant's mind without him expressing his position in pleadings or on the record if he really wanted there to be any consideration of the statute of limitations. It is absolutely clear that the point was not raised, much less "tried" on the merits. Accordingly, the issue was not preserved and there is nothing for this Board to review.

III. STATEMENT OF FACTS

As noted in part above, Complainant, Joel A. Moser, is the Trustee and sole beneficiary of The Moser Family Trust, a testamentary trust established by his mother. He is also the settlor, Trustee, and sole beneficiary of the international trust (Joel A. Moser

[15] *Id.*
[16] *Id.*

Family Trust) registered in the Cook Islands.[17] Assets belonging to the international trust are held in a bank account with Vontobel Bank located in Zürich, Switzerland.[18] The bank sends Moser quarterly bank statements.[19]

The Commission brought this case against the Appellant, Mario A. Mata, stemming from Mata's representation of Joel A. Moser in setting up the Joel A. Moser Family Trust, and registering the trust in the Cook Islands.[20] As part of that representation, on August 9, 2013, Moser delivered a check for $270,000 payable to Mata's IOLTA trust account in order that Mata would transfer that sum to the trust's Vontobel Bank account.[21] Shortly after Moser delivered the $270,000 check to Appellant, that check was deposited, on August 9, 2013, into Appellant's IOLTA bank account.[22] However, Appellant failed to transfer any of that $270,000 to Vontobel Bank account.[23] In fact, the record shows, Appellant appropriated for his own personal use all of the $270,000 entrusted to him by Moser.[24] No part of that sum has been refunded to Moser nor did Appellant render and accounting as required by TDRPC 1.14(b).[25]

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[17] RR. 27-29.
[18] RR. 40.
[19] RR. 8, 40, 41.
[20] RR. 27-30.
[21] RR. 17, 30-33; App. 3, Moser's $270,000 Check Payable to Mata's IOLTA Trust Account, August 9, 2013, RR. 38, Pet. Ex. 3.
[22] RR. 35-38; App. 4, Deposit Slip From Mata's IOLTA Trust Account For $270,000 Check, August 9, 2013, RR. 39, Pet. Ex. 4.
[23] RR. 40-41; App. 5, Vontobel Bank Statements, December 31, 2013, RR. 40, Pet. Ex. 5.
[24] RR. 43-44; App. 6, Mata IOLTA Account Bank Records and Statements, RR. 88-89, Pet. Ex. 7, 8.
[25] RR. 43-47.

In this case, Complainant Moser first discovered that there had been no deposit for $270,000 to his Vontobel Bank account in middle of January 2014, when he received his December 31, 2013, Vontobel Bank statement.[26] Moser and his lawyer made demand on Appellant for the return of the $270,000. According to Moser's lawyer, Appellant responded to Moser's lawyer stating that, "[Appellant] assured both me and my client that [Appellant] would have the matter resolved within the last quarter of 2015, and [Appellant] would have the $270,000 returned to [Moser's] Texas Bank & Trust account, the Moser Family Trust, Account 21 No. 14564075, the 2015 year end."[27] Additionally, as it was learned at trial, Appellant's IOLTA bank account statements, which Moser never saw, show that Respondent continued to withdraw funds from the $270,000 corpus until December 2014, after which none of $270,000 remained in Appellant's IOLTA account.[28]

Moser filed his grievance regarding Appellant's deeds with the office of the Chief Disciplinary Counsel on January 2, 2018, less than four years from receiving his December 31, 2013 bank statement in mid-January 2014.[29] It was then, in mid-January 2014 that Moser recognized his $270,000 had not been transferred to the Vontobel Bank account.[30] Further, as noted above, Appellant's IOLTA bank account statements show Appellant made withdrawals of Moser's funds through December 2014.[31] Accordingly, Appellant's

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[26] RR. 42-43, 63; App. 5, Vontobel Bank Statements, December 31, 2013, RR. 40, Pet. Ex. 5.
[27] RR. 75-77.
[28] RR. 87-88, 92-103; App. 6, Mata IOLTA Account Bank Records and Statements, RR. 88-89, Pet. Ex. 7, 8.
[29] App. 2, Moser Grievance Filed January 2, 2018, RR. 44-45, Pet. Ex. 6.
[30] *See* n. 25, *supra.*
[31] *See* n. 27, *supra.*

breach of his fiduciary duty to Moser continued at least through December 2014. In fact, Appellant's failure to render an accounting as required by TDRPC 1.14(b) continues to this very day. Therefore, the four year statute of limitations did not expire before Moser filed his grievance on January 2, 2018.[32]

IV. STANDARD OF REVIEW

In disciplinary cases, the substantial evidence standard of review applies. TEX. GOV'T CODE ANN. § 81.072(b)(7) (West 2011) (State Bar Act); *Comm'n for Lawyer Discipline v. Schaefer*, 364 S.W.3d 831, 835 (Tex. 2012). Under the substantial evidence test, the findings of an administrative body are presumed to be supported by substantial evidence, and the party challenging the findings bears the burden of proving otherwise. *City of El Paso v. Pub. Util. Comm'n of Tex.*, 883 S.W.2d 179, 185 (Tex. 1994). The fact finder is the exclusive judge of credibility and may believe or disbelieve one witness and not others. *Miller v. Comm'n for Lawyer Discipline*, 2004 Tex. App. LEXIS 11725 * 2 (Tex. App.-San Antonio, 2004, no pet.). The reviewing court may not substitute its judgment for that of the administrative body and must consider only the record upon which the decision is based. *R.R. Comm'n of Tex. v. Torch Operating Co.*, 912 S.W.2d 790, 792 (Tex. 1995); *Tex. State Bd. of Dental Exam'rs v. Sizemore*, 759 S.W.2d 114, 116 (Tex. 1988).

[32] RR. 44-45.

The substantial evidence standard focuses on whether there is any reasonable basis in the record for the administrative body's findings. *City of El Paso*, 883 S.W.2d at 185. Anything more than a scintilla of evidence is sufficient to support a finding. *Tex. Dep't of Pub. Safety v. Cuellar*, 58 S.W.3d 781, 783 (Tex. App. - San Antonio 2001, no pet.). The ultimate question is not whether a finding is correct, but only whether there is some reasonable basis for it. *City of El Paso*, 883 S.W.2d at 185.

V. ARGUMENT AND AUTHORITIES.

A. Legal Authorities.

1. Violation of TDRPC 1.14(b) Is A Breach of Fiduciary Duty.

"In some formal relationships, including the attorney-client relationship, a fiduciary duty arises as a matter of law. *Meyer v. Cathey*, 167 S.W.3d 327, 330 (Tex. 2005)."[33] The four year statute of limitations applies to such a claim.[34] A violation of TDRPC 1.14(b) falls into the category of breaches of fiduciary duties that can be considered by a court in determining sanctions that should be imposed on a lawyer.[35] Accordingly, the "discovery rule" applies to trigger of the beginning of the four year statute of limitations.

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[33] *Smith v. Aldridge*, 2012 Tex. App. LEXIS 2499 n*13-14 (Tex. App.-Houston [14th Dist.] 2012, pet. denied); See also, *Kastner v. Martin & Drought, Inc.*, 2009 Tex. App. LEXIS 701* 3-5 (Tex. App.-San Antonio 2009, pet. denied).

[34] *Id.*

[35] *James v. Comm'n for Lawyer Discipline*, 310 S.W.3d 586, 597 (Tex. App.-Dallas 2010, no pet.); (Lawyer was the custodian of settlement funds. As such, he had a duty to communicate timely with clients about the settlements and to give them their funds. *See* Tex. Disciplinary R. Prof'l Conduct 1.14(b), 1.15(d). Also, he had to provide them an accounting for their funds. *See id*. 1.04(d), 1.14(b). Appellant accepted a settlement of his case without consulting the client. *See id*. 1.02(a)(2). Appellant ignored clients' attempts to communicate with him and their reasonable requests for information. *See id*. 1.03(a). Appellant lied to his clients and cheated them. *See id*. 8.04(a)(3) ("A lawyer shall not . . . engage in conduct involving dishonesty, fraud, deceit or misrepresentation . . . ."). Appellant's actions, as testified to by his

2. Accrual of Breach of Fiduciary Duty Claims.

A suit for breach of fiduciary duty or fraud must be brought no later than four years from the date the cause of action accrues. Tex. Civ. Prac. & Rem. Code Ann. § 16.004(a) (West 2002). When a cause of action accrues is a question of law. *Moreno v. Sterling Drug, Inc.*, 787 S.W.2d 348, 351 (Tex. 1990). A cause of action accrues when facts have come into existence that authorize a claimant to seek a judicial remedy. *Apex Towing Co. v. Tolin*, 41 S.W.3d 118, 120 (Tex. 2001). Defendants seeking judgment on the basis of limitations must prove when the cause of action accrued. *Burns v. Thomas*, 786 S.W.2d 266, 267 (Tex. 1990). In most cases, a cause of action accrues when a wrongful act causes a legal injury, regardless of when the plaintiff learns of that injury. *Provident Life & Accident Ins. Co. v. Knott*, 128 S.W.3d 211, 221 (Tex. 2003).

When applicable, the discovery rule defers accrual of a cause of action until the plaintiff knew or, exercising reasonable diligence, should have known of the facts giving rise to the cause of action. *Computer Assocs. Int'l, Inc. v. Altai, Inc.*, 918 S.W.2d 453, 455 (Tex. 1996). The discovery rule applies to claims for breach of fiduciary duty. See *HECI Expl. Co. v. Neel*, 982 S.W.2d 881, 888 (Tex. 1998). Likewise, fraud prevents the running of the statute of limitations until it is discovered, or by the exercise of reasonable diligence

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clients, "constituted repeated, egregious breaches of his fiduciary duties to multiple clients. Applying the twelve considerations listed under rule of disciplinary procedure 3.10, we cannot conclude the trial court abused its discretion in determining disbarment was an appropriate sanction.").

might have been discovered. *Hooks v. Samson Lone Star, Ltd. P'ship*, 457 S.W.3d 52, 57 (Tex. 2015). "A person to whom a fiduciary duty is owed is relieved of the responsibility of diligent inquiry into the fiduciary's conduct, so long as the relationship exists. *S.V. v. R.V.*, 933 S.W.2d 1, 8 (Tex. 1996). However, once the fact of misconduct becomes apparent it can no longer be ignored, regardless of the nature of the relationship. Id." *Goughnour v. Patterson*, 2019 Tex. App. LEXIS 1665 *7-9 (Tex. App.-Tyler 2019, pet. denied).

B. Application of the Law to the Facts.

As indicated in the statement of facts, the critical events in this case are as follows: 1. on August 9, 2013, Moser delivered to Appellant a check for $270,000 for deposit in Appellant's IOLTA trust account; 2. that sum was in fact deposited in Appellant's IOLTA bank account;[36] 3. that sum was to be delivered by Appellant for Moser to a foreign bank account, Vontobel Bank;[37] 4. Appellant did not deliver the funds as agreed;[38] 5. Appellant spent all of the $270,000 for purposes not related to Moser or his trust;[39] and 6. when asked to return the funds, Appellant promised to do so, but simply failed to do so;[40] The final insult to Moser was that Appellant did not even attempt to provide an accounting for the funds as required by TDRPC 1.14(b).

[36] RR.
[37] RR.
[38] RR. 40-41.
[39] RR.
[40] RR.

The timeline in this case demonstrates that the four year statute of limitations did not expire and Moser's complaint was properly pursued by the Commission. The first relevant fact is that on August 9, 2013, Moser delivered a check for $270,000 payable to Mata's IOLTA trust account in order that Mata would transfer that sum to the trust's Vontobel Bank account.[41] Mata deposited that $270,000 check in his IOLTA account on August 9, 2013.[42] In the normal banking cycle, Vontobel Bank sends periodic statements to its depositors that set forth a summary of deposits, withdrawals, and other transactions. In or about mid-January 2014, Moser received his Vontobel Bank statement for the period ending December 31, 2013.[43] There was no deposit for $270,000 shown on the statement.[44] So, Moser, and later Moser's lawyer, contacted Mata to inquire about his funds.[45] Mata acknowledged he did not send the money to Vontobel Bank as directed by Moser. Also, Mata promised to pay the $270,000 back to Moser by year end 2015.[46] However, he paid nothing. Mata identified his bank records that showed he withdrew all of Moser's $270,000 during the period from August 9, 2013 through December 2014.[47]

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[41] RR. 17, 30-33; App. 3, Moser's $270,000 Check Payable to Mata's IOLTA Trust Account, August 9, 2013, RR. 38, Pet. Ex. 3.
[42] RR. 37-39; App. 4, Deposit Slip from Mata's IOLTA Trust Account For $270,000 Check, August 9, 2013, RR. 39, Pet. Ex. 4.
[43] 42-43, 63; App. 5, Vontobel Bank Statements, December 31, 2013, RR. 40, Pet. Ex. 5.
[44] *Id.*
[45] RR. 75-77.
[46] *Id.*
[47] RR. 87-88, 92-103; App. 6, Mata IOLTA Account Bank Records and Statements, RR. 88-89, Pet. Ex. 7, 8.

The very earliest Moser could have had any inkling that Mata was engaged in some foul play with Moser's $270,000 was Mid-January 2014. Moser testified that was when he received the December 31, 2013, Vontobel Bank statement by mail.[48]

The record also shows that Moser's grievance filing took place on January 2, 2018.[49] That is the date stamped on the grievance filing showing when the Chief Disciplinary Counsel's office received Moser's grievance. A simple calculation shows that the four year statute of limitations would not have expired until, at the earliest, January 15, 2018. The discovery rule certainly defers accrual of a cause of action until at the earliest, January 15, 2014, when Moser "knew or, exercising reasonable diligence, should have known of the facts giving rise to" his complaint.[50] It is also worth noting that Respondent's failure to provide an accounting, pursuant to TDRPC 1.14(b), is certainly ongoing in that the violation continues to this very day.

In light of all those facts being in the record, it is apparent that Appellant's contention has no substance as to the statute of limitations barring the prosecution of Moser's grievance.

VI. CONCLUSION.

The Commission respectfully requests that the Board decide Appellant's issues against him and that the judgment of disbarment be affirmed.

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[48] See n. 25, supra.
[49] App. 2, Moser Grievance Filed January 2, 2018, RR. 44-45, Pet. Ex. 6.
[50] *See Goughnour v. Patterson*, 2019 Tex. App. LEXIS 1665 *7-9 (Tex. App.-Tyler 2019, pet. denied).

PRAYER

Appellee, the Commission for Lawyer Discipline, respectfully prays that this Court affirm the Judgment of Disbarment in all respects.

RESPECTFULLY SUBMITTED:

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CERTIFICATE OF COMPLIANCE

Pursuant to the Texas Rules of Appellate Procedure, the enclosed Brief of the Commission for Lawyer Discipline contains approximately 3,830 words (total for all sections of brief that are required to be counted), which is less than the total words permitted by the TRAPs. Counsel relies on the word count of the computer program used to prepare this Brief.

Douglas S. Lang
DOUGLAS S. LANG

CERTIFICATE OF SERVICE

This is to certify that the above and foregoing Brief of the Commission for Lawyer Discipline has been served on Appellant, Mario A. Mata, 8801 La Cresada Drive, Apt. 1226, Austin, Texas 78749, by email to mariomataotc@gmail.com on the 27th day of August 2021.

Douglas S. Lang
DOUGLAS S. LANG

Appendix 1

BEFORE THE DISTRICT 9 GRIEVANCE COMMITTEE
EVIDENTIARY PANEL 9-1
STATE BAR OF TEXAS

COMMISSION FOR LAWYER DISCIPLINE, Petitioner	§ § § §	201800134
V.	§ §	
MARIO A. MATA, Respondent	§ §	

JUDGMENT OF DISBARMENT

Parties and Appearance

On this day came to be heard the above styled and numbered cause. Petitioner, Commission for Lawyer Discipline, appeared by and through its attorney of record and announced ready. Respondent, Mario A. Mata, Texas Bar Number 13184400, appeared in person announced ready.

Jurisdiction and Venue

The Evidentiary Panel 9-1, having been duly appointed to hear this complaint by the chair of the Grievance Committee for State Bar of Texas Distriet 9, finds that it has jurisdiction over the parties and the subject matter of this action and that venue is proper.

Professional Misconduct

The Evidentiary Panel, having considered all of the pleadings, evidence, stipulations and argument, finds Respondent has committed Professional Misconduct as defined by Rule 1.06(W) of the Texas Rules of Disciplinary Procedure.

Findings of Fact

The Evidentiary Panel, having considered the pleadings, evidence and argument of counsel, makes the following findings of fact and conclusions of law:

1. Respondent is an attorney licensed to practice law in Texas and is a member of the State Bar of Texas.
2. Respondent resides in and maintains his principal place of practice in Travis County, Texas.
3. On or about October 23, 2005, Respondent, Mario A. Mata, assisted Complainant, Joel A. Moser, in setting up the Joel A. Moser Family Trust, an offshore trust, located in the Cook Islands.
4. On or about August 9, 2013, Complainant deposited $270,000 from the Moser Family Trust into Respondent's IOLTA. Respondent was to transfer the $270,000 from his IOLTA into the Bank Ventobel account, which held the assets for the Joel A. Moser Family Trust. When Complainant received his January 2014 bank statement, he noticed that the money was never deposited into his Cook Island account by Respondent. Complainant then hired attorney John Danish, who wrote letters to Respondent on October 13, 2015, and February 9, 2016, asking for an accounting and return of the $270,000. Respondent failed to return the funds.
5. The Chief Disciplinary Counsel of the State Bar of Texas has incurred reasonable attorneys' fees and direct expenses associated with this Disciplinary Proceeding in the amount of $11,818.57.
6. Respondent owes restitution in the amount of $270,000 payable to the Moser Family Trust.

Conclusions of Law

The Evidentiary Panel concludes that, based on foregoing findings of fact, the following Texas Disciplinary Rules of Professional Conduct have been violated: 1.14(b).

Sanction

The Evidentiary Panel, having found Respondent has committed Professional Misconduct, heard and considered additional evidence regarding the appropriate sanction to be imposed against Respondent. After hearing all evidence and argument and after having considered the factors in Rule 2.18 of the Texas Rule of Disciplinary Procedure, the Evidentiary Panel finds that proper discipline of the Respondent for each act of Professional Misconduct is DISBARMENT.

Disbarment

It is therefore ORDERED, ADJUDGED and DECREED that effective March 4, 2020, Respondent, Mario A. Mata, State Bar Number 13184400, is hereby DISBARRED from the practice of law in the State of Texas.

It is further ORDERED Respondent is prohibited from practicing law in Texas, holding himself out as an attorney at law, performing any legal services for others, accepting any fee directly or indirectly for legal services, appearing as counsel or in any representative capacity in any proceeding in any Texas court or before any administrative body or holding himself out to others or using his name, in any manner, in conjunction with the words "attorney at law," "attorney," "counselor at law," or "lawyer."

Notification

It is further ORDERED Respondent shall immediately notify each of his current clients in writing of this disbarment. In addition to such notification, Respondent is ORDERED to return any files, papers, unearned monies and other property belonging to clients and former clients in Respondent's possession to the respective clients or former clients or to another attorney at the client's or former client's request. Respondent is further ORDERED to file with the State Bar of Texas, Chief Disciplinary Counsel's Office, P.O. Box 12487, Austin, TX 78711-2487 (1414 Colorado St., Austin, TX 78701) within thirty (30) days of the signing of this judgment by the Panel Chair, an affidavit stating that all current clients have been notified of Respondent's disbarment and that all files, papers, monies and other property belonging to all clients and former clients have been returned as ordered herein.

It is further ORDERED Respondent shall, on or before thirty (30) days from the signing of this judgment by the Panel Chair, notify in writing each and every justice of the peace, judge,

magistrate, administrative judge or officer and chief justice of each and every court or tribunal in which Respondent has any matter pending of the terms of this judgment, the style and cause number of the pending matter(s), and the name, address and telephone number of the client(s) Respondent is representing. Respondent is further ORDERED to file with the State Bar of Texas, Chief Disciplinary Counsel's Office, P.O. Box 12487, Austin, TX 78711-2487 (1414 Colorado St., Austin, TX 78701), within thirty (30) days of the signing of this judgment by the Panel Chair, an affidavit stating that each and every justice of the peace, judge, magistrate, administrative judge or officer and chief justice has received written notice of the terms of this judgment.

Surrender of License

It is further ORDERED Respondent shall, within thirty (30) days of the signing of this judgment by the Panel Chair, surrender his law license and permanent State Bar Card to the State Bar of Texas, Chief Disciplinary Counsel's Office, P.O. Box 12487, Austin, TX 78711-2487 (1414 Colorado St., Austin, TX 78701), to be forwarded to the Supreme Court of the State of Texas.

Restitution, Attorney's Fees and Expenses

It is further ORDERED Respondent shall pay restitution on or before April 5, 2020, to the Moser Family Trust in the amount of $270,000. Respondent shall pay the restitution by certified or cashier's check or money order made payable to the Moser Family Trust and delivered to the State Bar of Texas, Chief Disciplinary Counsel's Office, P.O. Box 12487, Austin, TX 78711-2487 (1414 Colorado St., Austin, TX 78701).

It is further ORDERED Respondent shall pay all reasonable and necessary attorney's fees and direct expenses to the State Bar of Texas in the amount of $11,818.57. The payment shall be due and payable on or before April 5, 2020, and shall be made by certified or cashier's check or money order. Respondent shall forward the funds, made payable to the State Bar of Texas, to the

Chief Disciplinary Counsel's Office, P.O. Box 12487, Austin, TX 78711-2487 (1414 Colorado St., Austin, TX 78701).

It is further ORDERED that all amounts ordered herein are due to the misconduct of Respondent and are assessed as a part of the sanction in accordance with Rule 1.06(Z) of the Texas Rules of Disciplinary Procedure. Any amount not paid shall accrue interest at the maximum legal rate per annum until paid and the State Bar of Texas shall have all writs and other post-judgment remedies against Respondent in order to collect all unpaid amounts.

Publication

It is further ORDERED this disbarment shall be made a matter of record and appropriately published in accordance with the Texas Rules of Disciplinary Procedure.

Conditions Precedent to Reinstatement

It is further ORDERED that payment of the foregoing restitution and attorney's fees and expenses amounts shall be a condition precedent to any consideration of reinstatement from disbarment as provided by Rules 2.19, 2.20 and 11.02(D) of the Texas Rules of Disciplinary Procedure.

It is further ORDERED a full psychological assessment to be conducted by a mental health professional licensed in Texas as a psychiatrist, a psychologist, a master's level social worker (LCSW), or a licensed professional counselor (LPC) shall be a condition precedent to any consideration of reinstatement from disbarment. Respondent shall complete the assessment at the earliest practicable date, but in no event no later than sixty (60) days before he files a petition for reinstatement. Although the details of information disclosed during the assessment shall remain confidential, the conclusions, diagnosis and treatment plan recommendations of the mental health professional shall be reported to the State Bar of Texas within ten (10) days of the completion of

the assessment. Respondent shall take all necessary action, including the execution of a valid release of information, to allow and direct the mental health professional to report such results and recommendations.

Respondent shall be responsible for all costs and expenses incurred, directly or indirectly, by compliance with these terms and shall pay all such costs and expenses as required by the provider, but in no event later than the final day of the supervision period.

Other Relief

All requested relief not expressly granted herein is expressly DENIED.

SIGNED this the 10 day of March, 2020.

EVIDENTIARY PANEL
DISTRICT NO. 9
STATE BAR OF TEXAS

Henry L. Moore
District 9-1 Presiding Member

Appendix 2

RECEIVED
JAN 02 2018
Chief Disciplinary Counsel
State Bar of Texas

OFFICE OF THE CHIEF DISCIPLINARY COUNSEL
STATE BAR OF TEXAS
GRIEVANCE FORM

ONLINE FILING AVAILABLE AT [illegible]

I. GENERAL INFORMATION

Before you fill out this paperwork, there may be a faster way to resolve the issue you are currently having with an attorney.

If you are considering filing a grievance against a Texas attorney for any of the following reasons:

- ~ You are concerned about the progress of your case.
- ~ Communication with your attorney is difficult.
- ~ Your case is over or you have fired your attorney and you need documents from your file or your former attorney.

You may want to consider contacting the Client-Attorney Assistance Program (CAAP) at 1-800-932-1900.

CAAP was established by the State Bar of Texas to help people resolve these kinds of issues with attorneys quickly, without the filing of a formal grievance.

CAAP can resolve many problems without a grievance being filed by providing information, by suggesting various self-help options for dealing with the situation, or by contacting the attorney either by telephone or letter.

I have _____ I have not ✓ contacted the Client-Attorney Assistance Program.

If you prefer, you have the option to file your grievance online at http://cdc.texasbar[illegible] .

In order for us to comply with our deadlines, additional information/documentation that you would like to include as part of your grievance submission must be received in this office by mail or fax within (10) days after submission of your grievance. This information will be added to your pending grievance. Information received after that timeframe will be returned and not considered. Thank you for your cooperation in this matter.

NOTE: Please be sure to fill out each section completely. Do not leave any section blank. If you do not know the answer to any question, write "I don't know."

Petitioner's Exhibit
6

II. INFORMATION ABOUT YOU – PLEASE KEEP CURRENT

1. TDCJ/SID # _____ Mr / Ms. Name: Joel A. Moser
   Immigration # _____

   Address: 1506 Oak Knoll

   City: Dallas State: Tx Zip Code: 75208

2. Employer: retired

   Employer's Address: _____

3. Telephone numbers: Residence: 214-946-1311 Work: N/A
   Cell: 214-274-5421

4. Email: N/A

5. Drivers License # 01572950 Date of Birth 2/24/44

6. Name, address, and telephone number of person who can always reach you.

   Name Susan Nearpass Address 1639 Cedar Hill
   Dallas 75208 Telephone 214 868 3286

7. Do you understand and write in the English language? yes
   If no, what is your primary language? N/A
   Who helped you prepare this form? N/A
   Will they be available to translate future correspondence during this process? N/A

8. Are you a Judge? NO
   If yes, please provide Court, County, City, State: _____

III. INFORMATION ABOUT ATTORNEY

Note: Grievances are not accepted against law firms. You must specifically name the attorney against whom you are complaining. A separate grievance form must be completed for each attorney against whom you are complaining.

1. Attorney name: Mario A Mata Address: One Congress Plaza
   111 Congress Ave Suite 400
   Austin Tx 78701

City: Austin State: TX Zip Code: 78701

2. Telephone number: Work 214-800-2363 Home _____ Other _____

3. Have you or a member of your family filed a grievance about this attorney previously?
Yes ___ No ✓ If "yes", please state its approximate date and outcome. _____

Have you or a member of your family ever filed an appeal with the Board of Disciplinary Appeals about this attorney?

Yes ____ No ✓ If "yes," please state its approximate date and outcome.

4. Please check one of the following:

✓ This attorney was **hired** to represent me.
_____ This attorney was **appointed** to represent me.
_____ This attorney was hired to represent **someone else**.

Please give the date the attorney was hired or appointed. 2005?

Please state what the attorney was hired or appointed to do.
set up foreign trust and transfer assets to the trust

5. What was your fee arrangement with the attorney? set fee

How much did you pay the attorney? a five figure sum - approximate 15-25K

If you signed a contract and have a <u>copy</u>, please attach.
If you have <u>copies</u> of checks and/or receipts, please attach.
<u>Do not send originals</u>.

6. If you did not hire the attorney, what is your connection with the attorney? Explain briefly
N/A

7. Are you currently represented by an attorney? yes
If yes, please provide information about your current attorney

John C. Denisch 1117 Capitol Court Irving 75060

8. Do you claim the attorney has an impairment, such as depression or a substance use disorder? If yes, please provide specifics (your **personal** observations of the attorney such as slurred speech, odor of alcohol, ingestion of alcohol or drugs in your presence etc., including the date you observed this, the time of day, and location).

NO

9. Did the attorney ever make any statements or admissions to you or in your presence that would indicate that the attorney may be experiencing an impairment, such as depression or a substance use disorder? If so, please provide details.

NO

IV. INFORMATION ABOUT YOUR GRIEVANCE

1. Where did the activity you are complaining about occur?

County: Dallas City: Dallas

2. If your grievance is about a lawsuit, answer the following, if known:

a. Name of court

b. Title of the suit

c. Case number and date suit was filed

d. If you are not a party to this suit, what is your connection with it? Explain briefly.

If you have <u>copies</u> of court documents, please attach.

3. Explain in detail why you think this attorney has done something improper or has failed to do something which should have been done. Attach additional sheets of paper if necessary.

Supporting documents, such as copies of a retainer agreement, proof of payment, correspondence between you and your attorney, the case name and number if a specific case is involved, and copies of papers filed in connection with the case, may be useful to our investigation. Do not send originals, as they will not be returned. Additionally, please do not use staples, post-it notes, or binding.

Include the names, addresses, and telephone number of all persons who know something about your grievance.

Also, please be advised that a copy of your grievance will be forwarded to the attorney named in your grievance.

Oct 13 2013

I deposited 270k from the Moser Family Trust into M. Mato's ~~for~~ IOLT Trust Account for the purpose of wiring the money to the foreign trust, the Joel A. Moser Family Trust.

from Bank Vontobel

When the end of year statement came in Jan '14 it was discovered that no transfer had taken place. To date the location and fate of the 270k is unknown. Enclosed is a letter from my attourney which should explain all facts.

V. HOW DID YOU LEARN ABOUT THE STATE BAR OF TEXAS' ATTORNEY GRIEVANCE PROCESS?

__	**Yellow Pages**	__	**CAAP**
__	**Internet**	✓	**Attorney**
__	**Other**	__	**Website**

VI. ATTORNEY-CLIENT PRIVILEGE WAIVER

I hereby expressly waive any attorney-client privilege as to the attorney, the subject of this grievance, and authorize such attorney to reveal any information in the professional relationship to the Office of Chief Disciplinary Counsel of the State Bar of Texas.

I understand that the Office of Chief Disciplinary Counsel maintains as confidential the processing of Grievances.

I hereby swear and affirm that I am the person named in Section II, Question 1 of this form (the Complainant) and that the information provided in this complaint is true and correct to the best of my knowledge.

Signature: J A Moses Date: 12/30/17

TO ENSURE PROMPT ATTENTION, THE GRIEVANCE SHOULD BE MAILED TO:

THE OFFICE OF CHIEF DISCIPLINARY COUNSEL
P.O. Box 13287
Austin, TX 78711
Fax: (512) 427-4169

JOHN C. DANISH

Attorney and Counselor at Law
1117 Capitol Court
Irving, Texas 75060-6200

Telephone: (972) 554-0500
Toll Free: (888) 866-6501

Facsimile: (972) 579-1343
E-Mail: jcdanish@juno.com

February 9, 2016

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED # *7015 0640 0004 7805 7554*
REGULAR MAIL, FACSIMILE (214) 276-7305, AND
ELECTRONIC MAIL <mario.mata@privatewealthlaw.com>

Attorney Mario A. Mata
500 E. 4th St., Ste. 353
Austin, Texas 78701

Re: **Dr. Joel Anthony Moser; Your File No. M94475**

Dear Attorney Mata:

As you know, I represent Dr. Joel Anthony Moser regarding the above matter. Please find this letter as a follow-up to my letter to you dated October 13, 2015, and my telephone conversation with you on October 23, 2015.

As stated within my October 13, 2015, letter to you, in 2005 you assisted Dr. Moser in the formation and implementation of **The Joel A. Moser Family Trust**, an international trust which was registered with the Cook Islands Registrar on October 24, 2005.

As discussed within my October 13, 2015, letter to you, you communicated with my client on or about August 8, 2013, concerning your willingness to facilitate Dr. Moser regarding his desire to make an additional $270,000.00 contribution into The Joel A. Moser Family Trust.

During this August 8, 2013, communication, you suggested that my client deposit said $270,000.00 into your IOLTA Trust Account, and in return, you would assist in the disbursement of the $270,000.00 into my client's The Joel A. Moser Family Trust.

Per your suggestion, my client deposited $270,000.00 into your CitiBank IOLTA Trust Account, Account Number 9786201289, the following day, August 9, 2013.

A copy of the August 9, 2013, Deposit Slip and Transaction Receipt is attached hereto as Exhibit "A" and incorporated by reference herein.

Further, a copy of the $270,000.00 Longview Bank and Trust Check, Check No. 1132, which was deposited into your CitiBank IOLTA Trust Account on August 12, 2015, is attached hereto as Exhibit "B" and incorporated by reference herein.

The enclosed Exhibits "A" and "B" show that the $270,000.00 was deposited into your CitiBank IOLTA Trust Account. As you know, however, unfortunately, the $270,000.00 was never disbursed into my client's trust account. My client, as well as his accountants, has been attempting to reach out to you since January 2014 to resolve this matter

As you also know, during my telephone conversation with you on October 23, 2015, you assured both me and my client that you would have the matter resolved within the last quarter of 2015, and you would have the $270,000.00 returned to my client's Texas Bank and Trust account named **The Moser Family Trust**, Account No. 1456407 by the 2015 year end.

My client has been waiting patiently for the return on the $270,000.00 back to his above account. However, as you know, you have yet to return his money.

Please remit the $270,000.00, within 10 days following your receipt of this letter, in its entirety, by returning it into Dr. Moser's Texas Bank and Trust account named **The Moser Family Trust**, Account No. 1456407. The Mailing Address for Texas Bank and Trust is PO Box 3188, Longview, Texas 75606, and the telephone number for Texas Bank and Trust is (903) 237-5500.

I have advised my client of his right to confer with the District Attorney's Office of Dallas County, Texas, as well as the Texas State Bar concerning the loss his $270,000.00 which, as shown via the enclosed Exhibits "A" and "B", he deposited into your CitiBank IOLTA Trust Account.

If you have any questions or concerns, please feel free to contact my office via my above referenced contact information. Thank you.

Yours very truly,

John C. Danish

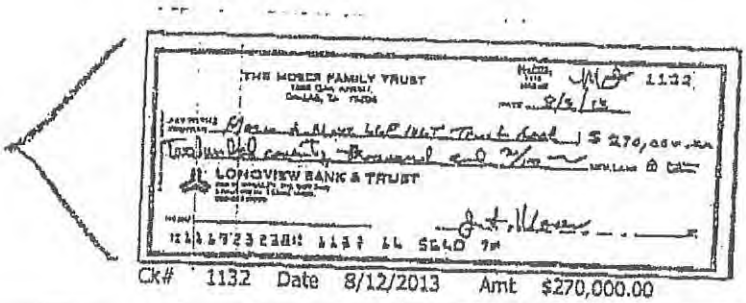
John C. Danish

Encl: (1) EXHIBIT A
(2) EXHIBIT B

cc: Dr. Joel A. Moser
1506 Oak Knoll Street
Dallas, Texas 75208
[with Enclosures]

JCD:nk:c2\msoffice\winword\letters\Moser, Joel.02.09.2016.ltr

Date 9/4/2013 Page 3
Account 1456407



Ck# 1132 Date 8/12/2013 Amt $270,000.00

EXHIBIT "B"

Transaction Receipt / Funds Availability Notice

CKG: DEPOSIT 08/09/13 17:03 FC#00148 FA# 002
065-01 Acct# xxxxxxx289 $270.000.00 ONL

Funds from your deposit/check cashing transaction will be delayed. Reasons and funds availability schedule follow.

$250.00	Available Today
$99.800	08/10/13 Standard delay
$169.950	08/13/13 Total check(s) deposited/cashed on this day exceed $100.000.

Thank you for banking with Citibank. citibank

Date: 8/9/13 Check your type of account below

citibank

Deposit to: ☒ Checking ☐ Money Market Account

Deposit to: ☐ Savings ☐ Certificate of Deposit ☐ Passbook Savings ☐ Market Rate Account

Checks and other items are received for deposit subject to the applicable account rules and regulations. Deposits may not be available for immediate withdrawal.

Account Name Mario Mata LLP / OLT Trust A.

Address 2444 Colo. Spring Rd

THANK YOU

Account Number * 9786201289

	DOLLARS	CENTS
Cash		
1		
2		
3		
4		
5		
Subtotal		
*Less Cash Received		
TOTAL $	270000.	xx

CUSTOMER COPY

EXHIBIT "A"

FROM

J.A. Wagner
1524 Oak Knoll
Dallas TX 75208

CERTIFIED MAIL

$7.50

TO

Office of CDC
P.O. Box 13287
Austin, Tx
TX 78711

RECEIVED

Appendix 3

THE MOSER FAMILY TRUST
1506 OAK KNOLL
DALLAS, TX 75208

88-2323
1119
1456407

1132

DATE 8/8/13

PAY TO THE ORDER OF Moro A. Moro LLP IOLT Trust Acct $ 270,000.xx

Two hundred seventy thousand and 70/100 DOLLARS

LONGVIEW BANK & TRUST
300 E. WHALEY, P.O. BOX 3188
LONGVIEW, TEXAS 75606
903-237-5500

MEMO

⑆111923238⑆ 1132 44 5640 7⑈

ENDORSE HERE

Petitioner's Exhibit 3

Appendix 4

Deposit Ticket

Date: 8/9/13 Check your type of account below

Deposit to: 28 ☒ Checking ☐ Money Market Account

Deposit to: 25 ☐ Savings ☐ Certificate of Deposit ☐ Passbook Savings ☐ Market Rate Account

Checks and other items are received for deposit subject to the applicable account rules and regulations. Deposits may not be available for immediate withdrawal.

Account Name MARIO MATA LLP/OLT Trust A.

Address 2404 Cedar Spring Rd

Sign here for cash received* (Not required for ATM deposits)

Account Number * 9786201289

▲ START 8 DIGIT ACCOUNT NUMBER HERE

citibank

	DOLLARS	CENTS
Cash		
CHECKS LIST SEPARATELY 1		
2		
3		
4		
5		
Subtotal		
*Less Cash Received		
TOTAL ▶ $	270,000.XX	

▲ WRITE NUMBERS IN SHADED BOXES

ITEM SF3700TX (Rev. 5/05) PKG 500

⑈8560684⑆ ⑆5777⑈ 1028⑆

Transaction Receipt / Funds Availability Notice

CKG: DEPOSIT 08/09/13 17:03 FC#00148 FA# 002
065-01 Acct# xxxxxxx289 $270,000.00 ONL

Funds from your deposit/check cashing transaction will be delayed. Reasons and funds availability schedule follow.

$250.00	Available Today
$99.800	08/10/13 Standard delay
$169.950	08/13/13 Total check(s) deposited/cashed on this day exceed $100.000.

Thank you for banking with Citibank.

citibank

X
Customer Signature(s)

Petitioner's Exhibit 4

Appendix 5

VONTOBEL

Petitioner's Exhibit 5

Statement of assets as of September 30, 2013

001

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser
[redacted]	[redacted]

Client investment profile

Reference currency	USD
Service type	Account/custody account

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

Bank Vontobel AG
Gotthardstrasse 43
CH-8022 Zürich

Telephone +41 58 283 71 11
Fax +41 58 283 76 50
www.vontobel.com

Content

VONTOBEL

Performance
Overview of asset performance

[redacted]

Statement of assets as of December 31, 2013
created on January 01, 2014

Performance from 11.07.2013 until 31.12.2013		USD
Starting value of assets as of 11.07.2013		0
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	1 032 622	
Withholding tax	0	
Total Net inflows, adjusted		1 032 622
Adjusted assets		1 032 622
Current earnings		
Net income credited	0	
Accrued interest on purchases and sales	0	
Change in accrued interest	0	
Withholding tax paid	0	
Total current earnings		0
Changes in value		– 817
Total return		– 817
Ending value of assets as of 31.12.2013		1 031 805
Net performance, time-weighted (TWR)		– 0.08%
Net performance, money-weighted (MWR)		– 0.08%

Asset overview
Total assets

[redacted]

Statement of assets as of December 31, 2013
created on January 01, 2014

Total assets by investment category and currency, valued in USD

	USD						Total	
Short-term investments	1 031 805	100.0%					1 031 805	100.0%
Bonds								
Equities								
Alternative investments								
Miscellaneous								
Total in USD	**1 031 805**	**100.0%**					**1 031 805**	**100.0%**
Total in foreign currency	1 031 805							
Exchange rate								

Allocation by investment category

- Short-term investments
- Bonds
- Equities
- Alternative investments
- Miscellaneous

Allocation by currency

- USD

VONTOBEL

Detailed positions
Short-term investments

[redacted]

Statement of assets as of December 31, 2013
created on January 01, 2014

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	1 031 805.49	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				1 031 805	100.00%
CHF	0.00	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.8894	0	
EUR	0.00	Current account Euro (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.3780	0	
Short-term investments								1 031 805	100.00%
Accrued interest								0	
Total short-term investments								**1 031 805**	**100.00%**
Total assets (excluding accrued interest)								1 031 805	100.00%
Accrued interest								0	
Total assets								**1 031 805**	**100.00%**

Important information

Statement of assets as of December 31, 2013
created on January 01, 2014

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

VONTOBEL

Important information

[redacted]

Statement of assets as of December 31, 2013
created on January 01, 2014

Miscellaneous | Precious metals and others

Vontobel bases the assessment of securities held in custody accounts on representative sources of information commonly used by banks. Derivative financial products issued by Vontobel are assessed using the latest bid price available at the point of valuation from internal Vontobel sources. The valuations serve as a guidance only and are not binding to the bank. The bank accepts no liability for the correctness of the valuation or for other information or calculations in connection with the assets entered into the account.

If no valuation is indicated, this means that no current price could be determined or that the instrument carries no value. The prices displayed do not commit the bank to buy or sell at this price or rate.

We kindly ask you to check this statement of assets and, in the event of discrepancies, to object in writing within four weeks from the mailing date.

Bank Vontobel AG
Gotthardstrasse 43, CH-8022 Zürich
Telephone +41 58 283 71 11
www.vontobel.com
Clearing: 8757, BIC: VONTCHZZXXX, CHE-116.300.767 VAT

Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.07.2013 until 30.09.2013 September 30, 2013

Overview	Debit	Credit	Account balance
Opening balance			0.00
Total credits		1 039 292.96	
Total debits	480.24		
Closing balance			1 038 812.72

Date	Information	Debit	Credit	Value date	Account balance
30.06.2013	Opening balance				0.00
17.07.2013	Credit ZKB, ZURICH Order number 205984036		1 039 292.96	16.07.2013	1 039 292.96
20.09.2013	Periodic fees [redacted] Order number 211848028	480.24		30.09.2013	1 038 812.72
	Total turnover	480.24	1 039 292.96		
30.09.2013	Closing balance				1 038 812.72

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

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Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.10.2013 until 31.12.2013 December 31, 2013

Overview	Debit	Credit	Account balance
Opening balance			1 038 812.72
Total credits			
Total debits	7 007.23		
Closing balance			1 031 805.49

Date	Information	Debit	Credit	Value date	Account balance
30.09.2013	Opening balance				1 038 812.72
02.10.2013	MANAGEMENT FEE THIRD QUARTER 2013 3RD PARTY Order number 212768150	2 351.35		02.10.2013	1 036 461.37
13.12.2013	Periodic fees [redacted] Order number 219164682	336.51		31.12.2013	1 036 124.86
24.12.2013	Transfer Australia & New Zealand Banking Order number 220114422	4 319.37		24.12.2013	1 031 805.49
	Total turnover	7 007.23			
31.12.2013	**Closing balance**				**1 031 805.49**

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

VONTOBEL

Statement of assets as of September 30, 2013

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust
Mandate	[redacted]

Client investment profile

Reference currency	USD
Service type	Account/custody account

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

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Content

VONTOBEL

Performance
Overview of asset performance

[redacted]

Statement of assets as of September 30, 2013
created on October 01, 2013

Performance from 11.07.2013 until 30.09.2013		USD
Starting value of assets as of 11.07.2013		0
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	1 039 293	
Withholding tax	0	
Total Net inflows, adjusted		1 039 293
Adjusted assets		**1 039 293**
Current earnings		
Net income credited	0	
Accrued interest on purchases and sales	0	
Change in accrued interest	0	
Withholding tax paid	0	
Total current earnings		0
Changes in value		– 480
Total return		– 480
Ending value of assets as of 30.09.2013		**1 038 813**
Net performance, time-weighted (TWR)		**– 0.05%**
Net performance, money-weighted (MWR)		**– 0.05%**

Asset overview
Total assets

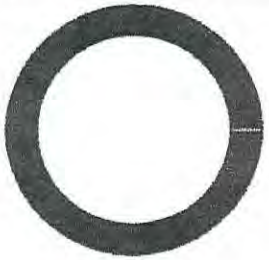
[redacted]

Statement of assets as of September 30, 2013
created on October 01, 2013

Total assets by investment category and currency, valued in USD

	USD							Total	
Short-term investments	1 038 813	100.0%						1 038 813	100.0%
Bonds									
Equities									
Alternative investments									
Miscellaneous									
Total in USD	**1 038 813**	**100.0%**						**1 038 813**	**100.0%**
Total in foreign currency	1 038 813								
Exchange rate									

Allocation by investment category



- Short-term investments
- Bonds
- Equities
- Alternative investments
- Miscellaneous

Allocation by currency

- USD

Detailed positions
Short-term investments

[redacted]

Statement of assets as of September 30, 2013
created on October 01, 2013

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	1 038 812.72	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				1 038 813	100.00%
CHF	0.00	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.9042	0	
EUR	0.00	Current account Euro (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.3537	0	
Short-term investments								1 038 813	100.00%
Accrued interest								0	
Total short-term investments								**1 038 813**	**100.00%**
Total assets (excluding accrued interest)								1 038 813	100.00%
Accrued interest								0	
Total assets								**1 038 813**	**100.00%**

Important information

Statement of assets as of September 30, 2013
created on October 01, 2013

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

Important information

1593995.001

Statement of assets as of September 30, 2013
created on October 01, 2013

Miscellaneous

Precious metals and others

Vontobel bases the assessment of securities held in custody accounts on representative sources of information commonly used by banks. Derivative financial products issued by Vontobel are assessed using the latest bid price available at the point of valuation from internal Vontobel sources. The valuations serve as a guidance only and are not binding to the bank. The bank accepts no liability for the correctness of the valuation or for other information or calculations in connection with the assets entered into the account.

If no valuation is indicated, this means that no current price could be determined or that the instrument carries no value. The prices displayed do not commit the bank to buy or sell at this price or rate.

We kindly ask you to check this statement of assets and, in the event of discrepancies, to object in writing within four weeks from the mailing date.

Statement of assets as of March 31, 2014

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate information

Mandate	[redacted]
Service type	Asset Management for third parties
Reference currency	USD

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

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VONTOBEL

018

Content

VON OBEL

Performance
Overview of asset performance

1593995.001

Statement of assets as of March 31, 2014
created on April 01, 2014

Performance from 01.01.2014 until 31.03.2014		USD
Starting value of assets as of 01.01.2014		**1 031 805**
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	– 2 580	
Withholding tax	0	
Total Net inflows, adjusted		– 2 580
Adjusted assets		**1 029 226**
Current earnings		
Net income credited	0	
Accrued interest on purchases and sales	0	
Change in accrued interest	0	
Withholding tax paid	0	
Total current earnings		0
Changes in value		– 600
Total return		– 600
Ending value of assets as of 31.03.2014		**1 028 626**
Net performance, time-weighted (TWR)		**– 0.06%**
Net performance, money-weighted (MWR)		**– 0.06%**

Asset overview
Total assets

1593995.001

Statement of assets as of March 31, 2014
created on April 01, 2014

Total assets by investment category and currency, valued in USD

	USD							Total	
Short-term investments	1 028 626	100.0%						1 028 626	100.0%
Bonds									
Equities									
Alternative investments									
Miscellaneous									
Total in USD	**1 028 626**	**100.0%**						**1 028 626**	**100.0%**
Total in foreign currency	1 028 626								
Exchange rate									

Allocation by investment category

- Short-term investments
- Bonds
- Equities
- Alternative investments
- Miscellaneous

Allocation by currency

- USD

VONTOBEL

Detailed positions
Short-term investments

[redacted]

Statement of assets as of March 31, 2014
created on April 01, 2014

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	1 028 626.37	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				1 028 626	100.00%
CHF	0.00	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.8834	0	
EUR	0.00	Current account Euro (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.3783	0	
Short-term investments								1 028 626	100.00%
Accrued interest								0	
Total short-term investments								**1 028 626**	**100.00%**
Total assets (excluding accrued interest)								1 028 626	100.00%
Accrued interest								0	
Total assets								**1 028 626**	**100.00%**

VON LOEBEL

Important information

[redacted]

Statement of assets as of March 31, 2014
created on April 01, 2014

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

Important information

[redacted]

Statement of assets as of March 31, 2014
created on April 01, 2014

Miscellaneous	Precious metals and others

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Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.01.2014 until 31.03.2014 March 31, 2014

Overview	Debit	Credit	Account balance
Opening balance			1 031 805.49
Total credits			
Total debits	3 179.12		
Closing balance			1 028 626.37

Date	Information	Debit	Credit	Value date	Account balance
31.12.2013	Opening balance				1 031 805.49
09.01.2014	MANAGEMENT FEE FOURTH QUARTER 2013 3RD PARTY Order number 220908131	2 579.51		09.01.2014	1 029 225.98
28.03.2014	Periodic fees [redacted] Order number 227626867	599.61		31.03.2014	1 028 626.37
	Total turnover	3 179.12			
31.03.2014	**Closing balance**				**1 028 626.37**

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

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Statement of assets as of June 30, 2014

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate information

Mandate	[redacted]
Service type	Asset Management for third parties
Reference currency	USD

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

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VON TOBEL

026

Content

Performance
Overview of asset performance

[redacted]

Statement of assets as of June 30, 2014
created on July 01, 2014

Performance from 01.01.2014 until 30.06.2014		USD
Starting value of assets as of 01.01.2014		**1 031 805**
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	– 5 237	
Withholding tax	0	
Total Net inflows, adjusted		– 5 237
Adjusted assets		**1 026 569**
Current earnings		
Net income credited	0	
Accrued interest on purchases and sales	0	
Change in accrued interest	0	
Withholding tax paid	0	
Total current earnings		0
Changes in value		– 1 191
Total return		– 1 191
Ending value of assets as of 30.06.2014		**1 025 378**
Net performance, time-weighted (TWR)		**– 0.12%**
Net performance, money-weighted (MWR)		**– 0.12%**

Asset overview
Total assets

[redacted]

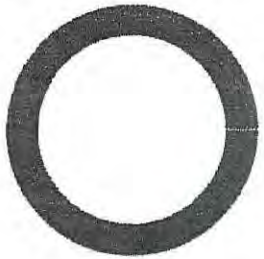
Statement of assets as of June 30, 2014
created on July 01, 2014

Total assets by investment category and currency, valued in USD

	USD						Total	
Short-term investments	1 025 378	100.0%					1 025 378	100.0%
Bonds								
Equities								
Alternative investments								
Miscellaneous								
Total in USD	1 025 378	100.0%					1 025 378	100.0%
Total in foreign currency	1 025 378							
Exchange rate								

Allocation by investment category

Allocation by currency



VONTOBEL

Detailed positions
Short-term investments

[redacted]

Statement of assets as of June 30, 2014
created on July 01, 2014

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	1 025 377.79	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				1 025 378	100.00%
CHF	0.00	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.8868	0	
EUR	0.00	Current account Euro (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.3691	0	
Short-term investments								1 025 378	100.00%
Accrued interest								0	
Total short-term investments								**1 025 378**	**100.00%**
Total assets (excluding accrued interest)								1 025 378	100.00%
Accrued interest								0	
Total assets								**1 025 378**	**100.00%**

Important information

[redacted]

Statement of assets as of June 30, 2014
created on July 01, 2014

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

Important information

1593995.001

Statement of assets as of June 30, 2014
created on July 01, 2014

Miscellaneous | Precious metals and others

Vontobel bases the assessment of securities held in custody accounts on representative sources of information commonly used by banks. Derivative financial products issued by Vontobel are assessed using the latest bid price available at the point of valuation from internal Vontobel sources. The valuations serve as a guidance only and are not binding to the bank. The bank accepts no liability for the correctness of the valuation or for other information or calculations in connection with the assets entered into the account.

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Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.04.2014 until 30.06.2014 — June 30, 2014

Overview	Debit	Credit	Account balance
Opening balance			1 028 626.37
Total credits			
Total debits	3 248.58		
Closing balance			1 025 377.79

Date	Information	Debit	Credit	Value date	Account balance
31.03.2014	Opening balance				1 028 626.37
02.04.2014	MANAGEMENT FEE FIRST QUARTER 2014, THIRD PARTY Order number 228610129	2 571.57		02.04.2014	1 026 054.80
13.05.2014	Tax services Order number 231823613	85.52		21.05.2014	1 025 969.28
24.06.2014	Periodic fees [redacted] Order number 235967945	591.49		30.06.2014	1 025 377.79
	Total turnover	3 248.58			
30.06.2014	Closing balance				1 025 377.79

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

Statement of assets as of September 30, 2014

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate information

Mandate	[redacted]
Service type	Asset Management for third parties
Reference currency	USD

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

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Content

VONTOBEL

Performance
Overview of asset performance

1593995.001

Statement of assets as of September 30, 2014
created on October 01, 2014

Performance from 01.01.2014 until 30.09.2014		USD
Starting value of assets as of 01.01.2014		**1 031 805**
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	– 11 302	
Withholding tax	0	
Total Net inflows, adjusted		– 11 302
Adjusted assets		**1 020 504**
Current earnings		
Net income credited	0	
Accrued interest on purchases and sales	0	
Change in accrued interest	0	
Withholding tax paid	0	
Total current earnings		0
Changes in value		– 1 756
Total return		**– 1 756**
Ending value of assets as of 30.09.2014		**1 018 748**
Net performance, time-weighted (TWR)		**– 0.17%**
Net performance, money-weighted (MWR)		**– 0.17%**

Asset overview
Total assets

[redacted]

Statement of assets as of September 30, 2014
created on October 01, 2014

Total assets by investment category and currency, valued in USD

	USD							Total	
Short-term investments	1 018 748	100.0%						1 018 748	100.0%
Bonds									
Equities									
Alternative investments									
Miscellaneous									
Total in USD	1 018 748	100.0%						1 018 748	100.0%
Total in foreign currency	1 018 748								
Exchange rate									

Allocation by investment category

- Short-term investments
- Bonds
- Equities
- Alternative investments
- Miscellaneous

Allocation by currency

- USD

VONTOBEL

Detailed positions
Short-term investments

[redacted]

Statement of assets as of September 30, 2014
created on October 01, 2014

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	1 018 747.51	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				1 018 748	100.00%
CHF	0.00	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.9555	0	
EUR	0.00	Current account Euro (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.2633	0	
Short-term investments								1 018 748	100.00%
Accrued interest								0	
Total short-term investments								**1 018 748**	**100.00%**
Total assets (excluding accrued interest)								1 018 748	100.00%
Accrued interest								0	
Total assets								**1 018 748**	**100.00%**

VONTOBEL

Important information

1593995.001

Statement of assets as of September 30, 2014
created on October 01, 2014

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

Important information

[redacted]

Statement of assets as of September 30, 2014
created on October 01, 2014

Miscellaneous	Precious metals and others

Vontobel bases the assessment of securities held in custody accounts on representative sources of information commonly used by banks. Derivative financial products issued by Vontobel are assessed using the latest bid price available at the point of valuation from internal Vontobel sources. The valuations serve as a guidance only and are not binding to the bank. The bank accepts no liability for the correctness of the valuation or for other information or calculations in connection with the assets entered into the account.

If no valuation is indicated, this means that no current price could be determined or that the instrument carries no value. The prices displayed do not commit the bank to buy or sell at this price or rate.

We kindly ask you to check this statement of assets and, in the event of discrepancies, to object in writing within four weeks from the mailing date.

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Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.07.2014 until 30.09.2014 September 30, 2014

Overview	Debit	Credit	Account balance
Opening balance			1 025 377.79
Total credits			
Total debits	6 630.28		
Closing balance			1 018 747.51

Date	Information	Debit	Credit	Value date	Account balance
30.06.2014	Opening balance				1 025 377.79
02.07.2014	Management Fee Third Party (Swiss American Advisors AG) Order number 236918424	2 563.44		02.07.2014	1 022 814.35
22.09.2014	Transfer AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD Order number 243725327	3 501.62		22.09.2014	1 019 312.73
24.09.2014	Periodic fees [redacted] Order number 243689005	565.22		30.09.2014	1 018 747.51
	Total turnover	6 630.28			
30.09.2014	Closing balance				1 018 747.51

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

Statement of assets as of December 31, 2014

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate information

Mandate	[redacted]
Service type	Asset Management for third parties
Reference currency	USD

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

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Performance
Overview of asset performance

1593995.001

Statement of assets as of December 31, 2014
created on January 01, 2015

Performance from 01.01.2014 until 31.12.2014		USD
Starting value of assets as of 01.01.2014		**1 031 805**
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	– 13 849	
Withholding tax	0	
Total Net inflows, adjusted		– 13 849
Adjusted assets		**1 017 957**
Current earnings		
Net income credited	358	
Accrued interest on purchases and sales	– 1 207	
Change in accrued interest	1 780	
Withholding tax paid	0	
Total current earnings		931
Changes in value		– 11 989
Total return		**– 11 058**
Ending value of assets as of 31.12.2014		**1 006 899**
Net performance, time-weighted (TWR)		**– 1.09%**
Net performance, money-weighted (MWR)		**– 1.08%**

VONTOBEL

Asset overview
Total assets

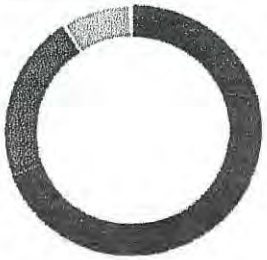
[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

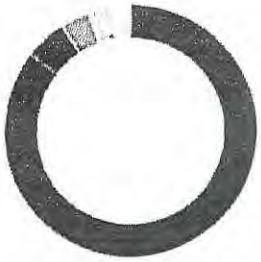
Total assets by investment category and currency, valued in USD

	USD		CHF		EUR		AUD		NOK			Total	
Short-term investments	697 622	69.3%										697 622	69.3%
Bonds	162 205	16.1%					29 649	2.9%	25 690	2.6%		217 544	21.6%
Equities			53 783	5.3%	37 950	3.8%						91 733	9.1%
Alternative investments													
Miscellaneous													
Total in USD	859 827	85.4%	53 783	5.3%	37 950	3.8%	29 649	2.9%	25 690	2.6%		1 006 899	100.0%
Total in foreign currency	859 827		53 441		31 362		36 231		192 611				
Exchange rate			0.9936		1.2101		0.8183		7.4975				

Allocation by investment category



Allocation by currency



Asset overview
Bonds and bond-like investments

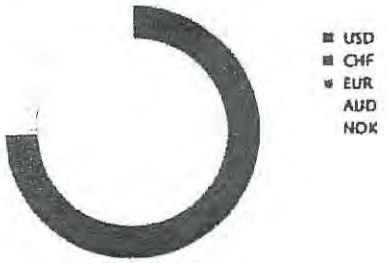
1593995.001

Statement of assets as of December 31, 2014
created on January 01, 2015

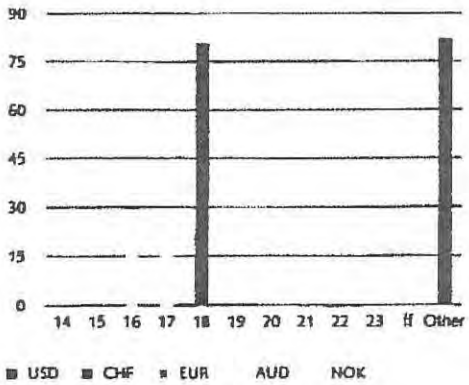
Bonds and bond-like investments by maturity and currency, valued in USD

	USD	CHF	EUR	AUD	NOK		Total	
2014								
2015								
2016				13.6%			13.6%	29 649
2017					11.8%		11.8%	25 690
2018	37.0%						37.0%	80 397
2019								
2020								
2021								
2022								
2023								
2024 and later								
Other	37.6%						37.6%	81 808
Total	**74.6%**			**13.6%**	**11.8%**		**100.0%**	
USD	162 205			29 649	25 690			217 544

Allocation by currency



Allocation by maturity (in thousands)



Asset overview
Equities and equity-like investments

1593995.001

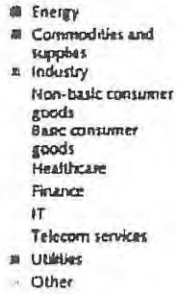
Statement of assets as of December 31, 2014
created on January 01, 2015

Equities and equity-like investments by industry sector and country group, valued in USD

	Switzerland	Eurozone	Rest of Europe	North America	Asia Pacific	Other	Total	
Energy								
Commodities and supplies								
Industry								
Non-basic consumer goods		20.7%					20.7%	18 992
Basic consumer goods	20.0%	20.7%					40.7%	37 312
Healthcare	38.6%						38.6%	35 429
Finance								
IT								
Telecom services								
Utilities								
Other								
Total	58.6%	41.4%					100.0%	
USD	53 783	37 950						91 733

Allocation by country group

Allocation by industry sectors



Detailed positions
Short-term investments

[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	697 621.87	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				697 622	69.28%
CHF	0.00	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.9936	0	
EUR	0.00	Current account Euro (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.2101	0	
Short-term investments								697 622	69.28%
Accrued interest								0	
Total short-term investments								**697 622**	**69.28%**

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Detailed positions
Bonds and bond-like investments

[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

Curr.	Quantity	Description Rating	Security no. ISIN	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Bonds USD										
USD	40 000	1.25% Anh-Bsch Inv Fn Senior A | A2	20465576 US035242AC00	17.01.2018 1.64%	USD	99.53%	98.86%	– 0.67%	39 544 228	3.93%
USD	40 000	1.75% Daimler Intl Reg-S Senior A- | A3	21087360 XS0914293575	10.04.2018 1.65%	USD	101.04%	100.30%	– 0.73%	40 120 506	3.98%
	360	ETF iShares National AMT-Free Muni Bond	3398490 US4642884146		USD	USD 111.32	110.34	– 0.88%	39 722	3.95%
	850	ETF Market Vectors Trust - Intermediate Municipal Index	3605062 US57060U8457		USD	USD 23.82	23.67	– 0.63%	20 120	2.00%
	1 400	Nuveen Texas Quality Income Municipal Fund	955965 US6709831050		USD	USD 15.12	15.69	3.77%	21 966	2.18%
Total bonds USD									162 205	16.11%

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Detailed positions
Bonds and bond-like investments

[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

Curr.	Quantity	Description Rating	Security no. ISIN	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Bonds AUD										
AUD	35 000	4.25% GECC Reg-S Senior AA+ | A1	19549496 XS0831773063	21.09.2016 2.83%	AUD	103.21% 0.8831	102.34% 0.8183	- 0.84% - 8.12%	29 312 337	2.91%
Total bonds AUD									29 649	2.94%
Bonds NOK										
NOK	180 000	3.25% BNG Reg-S Senior AA+ | Aaa	14858110 XS0739987781	02.02.2017 1.27%	NOK	104.26% 6.4783	104.05% 7.4975	- 0.20% - 13.77%	24 980 710	2.48%
Total bonds NOK									25 690	2.55%
Bonds and bond-like investments									215 764	21.43%
Accrued interest									1 780	
Total bonds and bond-like investments									217 544	21.61%

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Detailed positions
Equities and equity-like investments

[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

Quantity	Description	Security no. ISIN	Sector	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Equities CHF									
250	Nestle SA Registered	3886335 CH0038863350	Basic consumer goods	CHF	CHF 72.29 0.9478	72.95 0.9936	0.91% - 3.74%	18 354	1.82%
200	Novartis Inc Registered Valuation: 30.12.2014	1200526 CH0012005267	Healthcare	CHF	CHF 90.27 0.9579	92.35 0.9936	2.30% - 1.38%	18 588	1.85%
62	Roche Holding Ltd Dividend right certificate	1203204 CH0012032048	Healthcare	CHF	CHF 288.17 0.9575	269.90 0.9936	- 6.34% - 9.75%	16 841	1.67%
Total equities CHF								53 783	5.34%
Equities EUR									
480	Unilever NV	2560588 NL0000009355	Basic consumer goods	EUR	EUR 31.64 1.2569	32.64 1.2101	3.16% - 0.68%	18 958	1.88%

VONTOBEL

Detailed positions
Equities and equity-like investments

[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

Quantity	Description	Security no. ISIN	Sector	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Equities EUR (Continuation)									
85	Volkswagen AG Preferred	352781 DE0007664039	Non-basic consumer goods	EUR	EUR 175.58 1.2670	184.65 1.2101	5.17% 0.44%	18 992	1.89%
Total equities EUR								37 950	3.77%
Equities and equity-like investments								91 733	9.11%
Accrued interest								0	
Total equities and equity-like investments								**91 733**	**9.11%**
Total assets (excluding accrued interest)								1 005 119	99.82%
Accrued interest								1 780	
Total assets								**1 006 899**	**100.00%**

Important information

Statement of assets as of December 31, 2014
created on January 01, 2015

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

VONTOBEL

Important information

[redacted]

Statement of assets as of December 31, 2014
created on January 01, 2015

Miscellaneous	Precious metals and others

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If no valuation is indicated, this means that no current price could be determined or that the instrument carries no value. The prices displayed do not commit the bank to buy or sell at this price or rate.

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www.vontobel.com
Clearing: 8757, BIC: VONTCHZZXXX, CHE-116.300.767 VAT

Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.10.2014 until 31.12.2014 — December 31, 2014

Overview	Debit	Credit	Account balance
Opening balance			1 018 747.51
Total credits		357.96	
Total debits	321 483.60		
Closing balance			697 621.87

Date	Information	Debit	Credit	Value date	Account balance
30.09.2014	Opening balance				1 018 747.51
06.10.2014	Management Fee Third Party (Swiss American Advisors AG) Order number 244877979	2 546.87		01.09.2014	1 016 200.64
10.10.2014	Purchase 40000 1.25% Anh-Bsch Inv Fn 17.01.2018 Senior Order number 245338303	39 935.36		16.10.2014	976 265.28
10.10.2014	Purchase 40000 1.75% Daimler Intl 10.04.2018 Reg-S Senior Order number 245338502	40 775.25		15.10.2014	935 490.03
14.10.2014	Purchase 180000 3.25% BNG 02.02.2017 Reg-S Senior Order number 245602134	29 603.23		16.10.2014	905 886.80
14.10.2014	Purchase 35000 4.25% GECC 21.09.2016 Reg-S Senior Order number 245602211	31 991.40		16.10.2014	873 895.40
06.11.2014	Purchase 180 ETF iShares National AMT-Free Muni Bond Order number 247855229	20 039.90		12.11.2014	853 855.50
06.11.2014	Purchase 700 Nuveen Texas Quality Income Municipal Fund Order number 247855497	10 482.40		12.11.2014	843 373.10
06.11.2014	Purchase 850 ETF Market Vectors Trust - Intermediate Municipal Index Order number 247856133	20 246.63		12.11.2014	823 126.47
06.11.2014	Purchase 200 Novartis Inc Registered Order number 247859490	18 849.41		10.11.2014	804 277.06
06.11.2014	Purchase 480 Unilever NV Order number 247860654	19 087.12		10.11.2014	785 189.94

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Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]

01.10.2014 until 31.12.2014 (Continuation) December 31, 2014

Date	Information	Debit	Credit	Value date	Account balance
06.11.2014	Purchase 62 Roche Holding Ltd Dividend right certificate Order number 247862146	18 660.70		10.11.2014	766 529.24
07.11.2014	Purchase 180 ETF iShares National AMT-Free Muni Bond Order number 247973555	20 035.34		13.11.2014	746 493.90
07.11.2014	Purchase 700 Nuveen Texas Quality Income Municipal Fund Order number 247973694	10 692.31		13.11.2014	735 801.59
19.11.2014	Purchase 250 Nestle SA Registered Order number 249080891	19 067.55		21.11.2014	716 734.04
19.11.2014	Purchase 85 Volkswagen AG Preferred Order number 249081085	18 908.97		21.11.2014	697 825.07
01.12.2014	Cash distribution Nuv TX Qty In Mun Order number 249230984		76.30	01.12.2014	697 901.37
01.12.2014	Cash distribution Nuv TX Qty In Mun Order number 249821976		1.40	01.12.2014	697 902.77
04.12.2014	Cash distribution MktVtr Interm Munic Order number 250779033		39.70	05.12.2014	697 942.47
04.12.2014	Cash distribution iShs Nat AMT-Free Order number 250789794		87.63	05.12.2014	698 030.10
15.12.2014	Periodic fees [redacted] Order number 252108115	561.16		31.12.2014	697 468.94
30.12.2014	Cash distribution Nuv TX Qty In Mun Order number 252596411		76.30	31.12.2014	697 545.24
30.12.2014	Cash distribution iShs Nat AMT-Free Order number 253622886		76.63	31.12.2014	697 621.87
	Total turnover	321 483.60	357.96		
31.12.2014	Closing balance				697 621.87

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

Statement of assets as of March 31, 2015

Client information

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate information

Mandate	[redacted]
Service type	Asset Management for third parties
Reference currency	USD

Client advisor

Name	EAM Desk
Telephone	+41 58 283 51 10
Fax	+41 58 283 53 53
E-Mail	eaminternational@vontobel.ch

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Content

VONTOBEL

Performance
Overview of asset performance

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Performance from 01.01.2015 until 31.03.2015		USD
Starting value of assets as of 01.01.2015		**1 006 940**
Net inflows, adjusted		
Net inflows (Cash deposits/withdrawals and securities deliveries)	– 2 095	
Withholding tax	– 393	
Total Net Inflows, adjusted		– 2 488
Adjusted assets		**1 004 453**
Current earnings		
Net income credited	4 164	
Accrued interest on purchases and sales	– 2 598	
Change in accrued interest	1 830	
Withholding tax paid	393	
Total current earnings		3 789
Changes in value		– 2 127
Total return		**1 662**
Ending value of assets as of 31.03.2015		**1 006 105**
Net performance, time-weighted (TWR)		**0.17%**
Net performance, money-weighted (MWR)		**0.17%**

VONTOBEL

Asset overview
Total assets

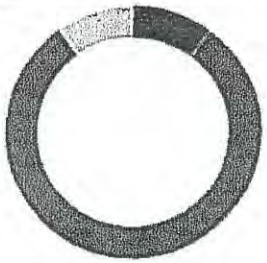
[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

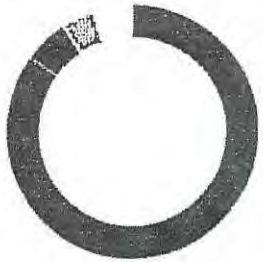
Total assets by investment category and currency, valued in USD

	USD		CHF		EUR		AUD		NOK		Total	
Short-term investments	102 113	10.1%	1 196	0.1%	125	0.0%					103 434	10.3%
Bonds	752 874	74.8%					28 036	2.8%	23 270	2.3%	804 180	79.9%
Equities			55 804	5.5%	42 688	4.2%					98 492	9.8%
Alternative investments												
Miscellaneous												
Total in USD	854 987	85.0%	56 999	5.7%	42 813	4.3%	28 036	2.8%	23 270	2.3%	1 006 105	100.0%
Total in foreign currency	854 987		55 364		39 863		36 699		187 538			
Exchange rate			0.9713		1.0740		0.7639		8.0591			

Allocation by investment category



Allocation by currency



VONTOBEL

Asset overview
Bonds and bond-like investments

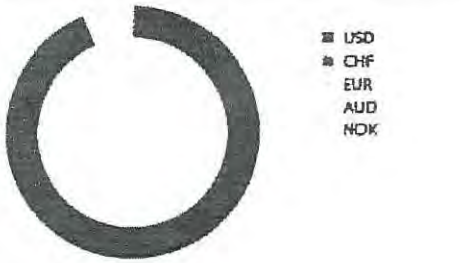
[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

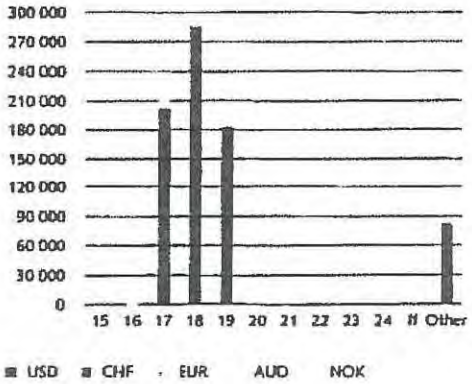
Bonds and bond-like investments by maturity and currency, valued in USD

	USD	CHF	EUR	AUD	NOK		Total	
2015								
2016				3.5%			3.5%	28 036
2017	25.2%				2.9%		28.1%	225 613
2018	35.5%						35.5%	285 542
2019	22.7%						22.7%	182 912
2020								
2021								
2022								
2023								
2024								
2025 and later								
Other	10.2%						10.2%	82 076
Total	**93.6%**			**3.5%**	**2.9%**		**100.0%**	
USD	752 874			28 036	23 270			804 180

Allocation by currency



Allocation by maturity



Asset overview
Equities and equity-like investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Equities and equity-like investments by industry sector and country group, valued in USD

	Switzerland	Eurozone	Rest of Europe	North America	Asia Pacific	Other	Total	
Energy								
Commodities and supplies								
Industry								
Non-basic consumer goods		23.0%					23.0%	22 626
Basic consumer goods	19.2%	20.4%					39.6%	38 954
Healthcare	37.5%						37.5%	36 912
Finance								
IT								
Telecom services								
Utilities								
Other								
Total	**56.7%**	**43.3%**					**100.0%**	
USD	55 804	42 688						98 492

Allocation by country group

- Switzerland
- Eurozone
- Rest of Europe
- North America
- Asia Pacific
- Other

Allocation by industry sectors

- Energy
- Commodities and supplies
- Industry
- Non-basic consumer goods
- Basic consumer goods
- Healthcare
- Finance
- IT
- Telecom services
- Utilities
- Other

VONTOBEL

Detailed positions
Short-term investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Curr.	Quantity	Description	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Valuation Exchange rate	Market price Exchange rate	Market value USD Accrued interest in USD	% of net assets
Account investments									
USD	102 113.15	Current account USD (USD) IBAN CH80 0875 7000 0124 1191 8		USD				102 113	10.15%
CHF	1 161.31	Current account Swiss Franc (CHF) IBAN CH53 0875 7000 0124 1191 9		CHF			0.9713	1 196	0.12%
EUR	116.28	Current account EUR (EUR) IBAN CH10 0875 7000 0124 1191 7		EUR			1.0740	125	0.01%
Short-term investments								103 434	10.28%
Accrued interest								0	
Total short-term investments								**103 434**	**10.28%**

VONTOBEL

Detailed positions
Bonds and bond-like investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Curr.	Quantity	Description Rating	Security no. ISIN	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Bonds USD										
USD	40 000	1.7% AT&T Senior BBB+ | Baa1	18817841 US00206RBF82	01.06.2017 1.54%	USD	101.54%	100.35%	- 1.17%	40 138 227	3.99%
USD	40 000	2.125% BAT Intl Fin Reg-S Senior A- | A3	18750558 USG08820BU89	07.06.2017 1.33%	USD	102.55%	101.73%	- 0.80%	40 690 267	4.04%
USD	40 000	1.4% NTT Senior AA- | Aa3	19034326 US654624AE53	18.07.2017 1.36%	USD	101.09%	100.10%	- 0.98%	40 038 112	3.98%
USD	40 000	1.625% GDF Suez Reg-S Senior A | A1	19736378 USF42768GN96	10.10.2017 1.31%	USD	101.64%	100.80%	- 0.83%	40 318 307	4.01%
USD	40 000	1.375% BP Capital Markets Senior A | A2	19958333 US05565QCC06	06.11.2017 1.35%	USD	100.83%	100.07%	- 0.75%	40 026 220	3.98%
USD	40 000	1.25% Anh-Bsch Inv Fn Senior A | A2	20465576 US035242AC00	17.01.2018 1.23%	USD	99.53%	100.06%	0.53%	40 024 103	3.98%
USD	40 000	1.2% Prov Ontario Senior AA- | Aa2	20680891 US683234C556	14.02.2018 1.14%	USD	100.83%	100.19%	- 0.63%	40 076 61	3.98%
USD	40 000	1.75% Daimler Intl Reg-S Senior A- | A3	21087360 XS0914293575	10.04.2018 1.38%	USD	101.04%	101.10%	0.06%	40 438 681	4.02%

VONTOBEL

Detailed positions
Bonds and bond-like investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Curr.	Quantity	Description Rating	Security no. ISIN	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Bonds USD (Continuation)										
USD	40 000	2.2% RBC Senior AA- | Aa3	21982498 US78008S7D27	27.07.2018 1.62%	USD	103.04%	101.90%	- 1.11%	40 760 154	4.05%
USD	40 000	2% Prov Ontario Senior AA- | Aa2	22424013 US683235AA32	27.09.2018 1.32%	USD	103.08%	102.34%	- 0.72%	40 934 7	4.07%
USD	40 000	1.875% Asian Develop Bank Senior AAA | Aaa	14106568 US045167CB74	23.10.2018 1.18%	USD	103.68%	102.42%	- 1.22%	40 966 327	4.07%
USD	40 000	2% Shell Int Fin Senior AA | Aa1	22872924 US822582BA91	15.11.2018 1.50%	USD	102.55%	101.78%	- 0.75%	40 712 300	4.05%
USD	40 000	1.95% IBM Senior AA- | Aa3	23675805 US459200HT14	12.02.2019 1.59%	USD	102.95%	101.36%	- 1.54%	40 544 106	4.03%
USD	40 000	1.75% Colgate-Palmolive Senior AA- | Aa3	23834077 US19416QEF37	15.03.2019 1.52%	USD	102.25%	100.92%	- 1.30%	40 366 31	4.01%
USD	100 000	1.75% United States Treasury Notes Senior — | Aaa	25461179 US912828F395	30.09.2019 1.33%	USD	102.73%	101.87%	- 0.84%	101 865	10.12%
	360	ETF iShares National AMT-Free Muni Bond	3398490 US4642884146		USD	USD 111.32	110.60	- 0.65%	39 816	3.96%

VONTOBEL

Detailed positions
Bonds and bond-like investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Curr.	Quantity	Description Rating	Security no. ISIN	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Bonds USD (Continuation)										
	850	ETF Market Vectors Intermediate Municipal Index Market Vectors - Intermediate Municipal Index	3605062 US57060U8457		USD	USD 23.82	23.81	- 0.04%	20 238	2.01%
	1 400	Nuveen Texas Quality Income Municipal Fund	955965 US6709831050		USD	USD 15.12	15.73	4.03%	22 022	2.19%
Total bonds USD									752 874	74.83%
Bonds AUD										
AUD	35 000	4.25% GECC Reg-S Senior AA+ | A1	19549496 XS0831773063	21.09.2016 2.41%	AUD	103.21% 0.8831	102.63% 0.7639	- 0.56% - 13.98%	27 441 595	2.73%
Total bonds AUD									28 036	2.79%

VONTOBEL

Detailed positions
Bonds and bond-like investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Curr.	Quantity	Description Rating	Security no. ISIN	Maturity Yield to mat.	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Bonds NOK										
NOK	180 000	3.25% BNG Reg-S Senior AA+ | Aaa	14858110 XS0739987781	02.02.2017 1.22%	NOK	104.26% 6.4783	103.68% 8.0591	– 0.56% – 20.06%	23 157 113	2.30%
Total bonds NOK									**23 270**	**2.31%**
Bonds and bond-like investments									800 570	79.57%
Accrued interest									3 610	
Total bonds and bond-like investments									**804 180**	**79.93%**

VONTOBEL

Detailed positions
Equities and equity-like investments

Statement of assets as of March 31, 2015
created on April 01, 2015

Quantity	Description	Security no. ISIN	Sector	Risk curr.	Cost price Exchange rate		Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Equities CHF										
250	Nestle SA Registered	3886335 CH0038863350	Basic consumer goods	CHF	CHF	72.29 0.9478	73.40 0.9713	1.54% – 0.92%	18 892	1.88%
200	Novartis Inc Registered	1200526 CH0012005267	Healthcare	CHF	CHF	90.27 0.9579	96.15 0.9713	6.51% 5.04%	19 798	1.97%
62	Roche Holding Ltd Dividend right certificate	1203204 CH0012032048	Healthcare	CHF	CHF	288.17 0.9575	268.10 0.9713	– 6.96% – 8.29%	17 113	1.70%
Total equities CHF									55 804	5.55%
Equities EUR										
480	Unilever NV	2560588 NL0000009355	Basic consumer goods	EUR	EUR	31.64 1.2569	38.92 1.0740	23.01% 5.11%	20 062	1.99%

VONTOBEL

Detailed positions
Equities and equity-like investments

[redacted]

Statement of assets as of March 31, 2015
created on April 01, 2015

Quantity	Description	Security no. ISIN	Sector	Risk curr.	Cost price Exchange rate	Market price Exchange rate	Change price Change total	Market value USD Accrued interest in USD	% of net assets
Equities EUR (Continuation)									
85	Volkswagen AG Preferred	352781 DE0007664039	Non-basic consumer goods	EUR	EUR 175.58 1.2670	247.85 1.0740	41.16% 19.66%	22 626	2.25%
Total equities EUR								42 688	4.24%
Equities and equity-like investments								98 492	9.79%
Accrued interest								0	
Total equities and equity-like investments								98 492	9.79%
Total assets (excluding accrued interest)								1 002 495	99.64%
Accrued interest								3 610	
Total assets								1 006 105	100.00%

Important information

Performance analysis

Current earnings	Earnings from interest and dividends less any withholding tax paid (credited net earnings), balance of accrued interest on purchases and sales and changes in accrued interest.
Changes in value	Realised and unrealised gains arising from changes in value. Unrealised gains consist of changes in value affecting existing positions at the time of valuation.
Total return	Total return equals the sum of current earnings plus changes in value.
Ending value of assets	The assets shown in the performance overview can differ from the assets shown in the asset overview due to differences in the evaluation method (reference date).
Performance	Performance measures the total income of the portfolio relative to the portfolio value. Inflows and outflows (withdrawals and deposits) are considered using the money and time-weighted calculation method. Performance relates to the reporting period.
Net performance	Performance after deduction of all transaction and administrative costs and net of non-reclaimable withholding taxes.
Time-weighted	The reporting period is divided into sub-periods. Performance is calculated for each sub-period and then combined for the entire reporting period. This neutralises inflows and outflows (withdrawals and deposits) meaning they do not have any impact on performance.
Money-weighted	Performance is calculated by dividing the sum of current earnings and changes in value by the average invested capital. Inflows and outflows (withdrawals and deposits) impact the amount of invested capital and thus performance.

Asset overview and detailed positions

Short-term investments	Account assets and liabilities, accrued interest of short-term investments, foreign exchange transactions, money market investments, money market investment funds and structured products with money market characteristics
Bonds and bond-like investments	Bonds and similar investments, accrued interest of bonds and bond-like investments, bond investment funds and structured products with bond characteristics
Equities and equity-like investments	Equities and equity-like investments, equity investment funds and structured products with equity characteristics
Alternative investments	Units in hedge funds, private equity investments, real estate investments and commodities

Important information

1593995.001

Statement of assets as of March 31, 2015
created on April 01, 2015

Miscellaneous

Precious metals and others

Vontobel bases the assessment of securities held in custody accounts on representative sources of information commonly used by banks. Derivative financial products issued by Vontobel are assessed using the latest bid price available at the point of valuation from internal Vontobel sources. The valuations serve as a guidance only and are not binding to the bank. The bank accepts no liability for the correctness of the valuation or for other information or calculations in connection with the assets entered into the account.

If no valuation is indicated, this means that no current price could be determined or that the instrument carries no value. The prices displayed do not commit the bank to buy or sell at this price or rate.

We kindly ask you to check this statement of assets and, in the event of discrepancies, to object in writing within four weeks from the mailing date.

Bank Vontobel AG
Gotthardstrasse 43, CH-8022 Zürich
Telephone +41 58 283 71 11
www.vontobel.com
Clearing: 8757, BIC: VONTCHZZXXX, CHE-116.300.767 VAT

Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account Swiss Franc (CHF)

Name	Asiatrust Limited as trustee of The Joel A. Moser Family Trust
Mandate	[redacted]
Account number	[redacted]
IBAN	[redacted]

Account statement

01.01.2015 until 31.03.2015 — March 31, 2015

Overview	Debit	Credit	Account balance
Opening balance			0.00
Total credits		1 161.31	
Total debits			
Closing balance			1 161.31

Date	Information	Debit	Credit	Value date	Account balance
31.12.2014	Opening balance				0.00
05.03.2015	Cash distribution Novartis N Order number 260354648		338.00	05.03.2015	338.00
09.03.2015	REIMBURSEMENT OF TRADING FEES Order number 260698841		500.91	13.03.2015	838.91
10.03.2015	Cash distribution Roche Hldg GS Order number 260795428		322.40	10.03.2015	1 161.31
	Total turnover		1 161.31		
31.03.2015	**Closing balance**				**1 161.31**

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

L.34.171.400 (Copy)

Bank Vontobel AG
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www.vontobel.com
Clearing: 8757, BIC: VONTCHZZXXX, CHE-116.300.767 VAT

Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account EUR (EUR)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN [redacted]

Account statement

01.01.2015 until 31.03.2015 March 31, 2015

Overview	Debit	Credit	Account balance
Opening balance			0.00
Total credits		116.28	
Total debits			
Closing balance			116.28

Date	Information	Debit	Credit	Value date	Account balance
31.12.2014	Opening balance				0.00
11.03.2015	Cash distribution Unilever Drp 15 Order number 261013958		116.28	11.03.2015	116.28
	Total turnover		116.28		
31.03.2015	**Closing balance**				**116.28**

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

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Telephone +41 58 283 71 11
www.vontobel.com
Clearing: 8757, BIC: VONTCHZZXXX, CHE-116.300.767 VAT

Client advisor
EAM Desk
Telephone +41 58 283 51 10

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]
IBAN CH80 0875 7000 0124 1191 8

Account statement

01.01.2015 until 31.03.2015 March 31, 2015

Overview	Debit	Credit	Account balance
Opening balance			697 621.87
Total credits		3 382.76	
Total debits	598 891.48		
Closing balance			102 113.15

Date	Information	Debit	Credit	Value date	Account balance
31.12.2014	Opening balance				697 621.87
05.01.2015	Cash distribution MktVtr Interm Munic Order number 253774332		40.97	05.01.2015	697 662.84
09.01.2015	Management Fee Third Party (Swiss American Advisors AG) Order number 254323977	2 517.25		09.01.2015	695 145.59
20.01.2015	Interest 1.25 Anh18 SrN Order number 255303559		250.00	20.01.2015	695 395.59
20.01.2015	Tax services Order number 255476209	86.95		29.01.2015	695 308.64
02.02.2015	Cash distribution Nuv FX Qty In Mun Order number 255833083		76.30	02.02.2015	695 384.94
02.02.2015	Interest 3.25 BNG 17 Reg-S, NOK 5'850.00 Order number 257014424		748.29	02.02.2015	696 133.23
04.02.2015	Purchase 100000 1.75% United States Treasury Notes 30.09.2019 Senior Order number 257372682	103 344.48		05.02.2015	592 788.75
04.02.2015	Purchase 40000 1.7% AT&T 01.06.2017 Senior Order number 257391827	40 744.88		09.02.2015	552 043.87
04.02.2015	Purchase 40000 1.625% GDF Suez 10.10.2017 Reg-S Senior Order number 257392011	40 871.66		09.02.2015	511 172.21
04.02.2015	Purchase 40000 1.375% BP Capital Markets 06.11.2017 Senior Order number 257392106	40 474.52		09.02.2015	470 697.69
04.02.2015	Purchase 40000 1.2% Prov Ontario 14.02.2018 Senior Order number 257392185	40 565.77		09.02.2015	430 131.92
04.02.2015	Purchase 40000 2.2% RBC 27.07.2018 Senior Order number 257392294	41 243.98		09.02.2015	388 887.94

MONTOBEL

Current account USD (USD)
Name Asiatrust Limited as trustee of The Joel A. Moser Family Trust

Mandate [redacted]
Account number [redacted]

01.01.2015 until 31.03.2015 (Continuation) March 31, 2015

Date	Information	Debit	Credit	Value date	Account balance
04.02.2015	Purchase 40000 2% Prov Ontario 27.09.2018 Senior Order number 257392365	41 525.38		09.02.2015	347 362.56
04.02.2015	Purchase 40000 2% Shell Int Fin 15.11.2018 Senior Order number 257392464	41 205.13		09.02.2015	306 157.43
04.02.2015	Purchase 40000 1.75% Colgate-Palmolive 15.03.2019 Senior Order number 257392501	41 178.33		09.02.2015	264 979.10
05.02.2015	Cash distribution MktVtr Interm Munic Order number 257448286		39.78	06.02.2015	265 018.88
05.02.2015	Cash distribution iShs Nat AMT-Free Order number 257469311		87.32	06.02.2015	265 106.20
13.02.2015	Purchase 40000 1.4% NTT 18.07.2017 Senior Order number 258242627	40 483.62		19.02.2015	224 622.58
13.02.2015	Purchase 40000 1.875% Asian Develop Bank 23.10.2018 Senior Order number 258245460	41 714.60		19.02.2015	182 907.98
13.02.2015	Purchase 40000 1.95% IBM 12.02.2019 Senior Order number 258250252	41 193.51		19.02.2015	141 714.47
13.02.2015	Purchase 40000 2.125% BAT Intl Fin 07.06.2017 Reg-S Senior Order number 258250541	41 188.31		19.02.2015	100 526.16
16.02.2015	Interest 1.2 Pro Ontario 18 Order number 258278609		240.00	17.02.2015	100 766.16
02.03.2015	Cash distribution Nuv TX Qty In Mun Order number 259134821		76.30	02.03.2015	100 842.46
05.03.2015	Cash distribution MktVtr Interm Munic Order number 260368690		35.96	06.03.2015	100 878.42
10.03.2015	Cash distribution iShs Nat AMT-Free Order number 260361047		86.54	06.03.2015	100 964.96
16.03.2015	Interest 1.75 Colg 19 SeMTNH Order number 261355743		350.00	16.03.2015	101 314.96
25.03.2015	Periodic fees [redacted] Order number 262355260	553.11		31.03.2015	100 761.85
26.03.2015	Interest 2 Prov Ontario 18 Order number 262861423		400.00	27.03.2015	101 161.85
30.03.2015	Interest 1.75 US Tr Nts 19 Order number 263130791		875.00	31.03.2015	102 036.85
31.03.2015	Cash distribution Nuv TX Qty In Mun Order number 262444086		76.30	01.04.2015	102 113.15
	Total turnover	598 891.48	3 382.76		
31.03.2015	Closing balance				102 113.15

We kindly ask you to check this account statement and, in the event of discrepancies, to send any objections in writing within four weeks of the mailing date.

Appendix 6

citi

AFFIDAVIT

STATE OF TEXAS)

)SS:

COUNTY OF BEXAR)

I Hayde Benavides do hereby state and declare as follows:

1. I am an employee of and duly authorized custodian of the records of Citibank, N.A. (hereinafter "CBNA").
2. The testimony in this affidavit is based upon my review of documents maintained in the ordinary course of business, and to the best of my knowledge, the facts contained herein are true and correct.
3. The accounts in question are or were owned and issued by CBNA.
4. The attached records are copies or duplicates of the available records requested in the Subpoena.
5. The records were prepared by the personnel of the business in the ordinary course of business at or near the time of the act, condition or event.
6. Documents attached are in the matter of Mario A. Mata, # 201800134, Citibank reference# LSI-08162018-76766.

I certify under penalty of perjury that the foregoing is true and correct. Executed on November 15, 2018 at San Antonio, TX.

Hayde Benavides

Hayde Benavides, Legal Support Specialist
Citbank N.A.

Subscribed and sworn to before me on November 15, 2018.

PAULA MANCILLA
Notary ID #129545456
My Commission Expires
September 13, 2021

My commission expires 9/13/21

Paula Mancilla
Notary Public

Petitioner's Exhibit
7

Citibank N.A., Subpoena Compliance Unit, 100 Citibank Drive, Bldg. 1, Floor 2, San Antonio, TX 78245-3214
Tel: 210-677-1936, Fax: 210-881-6601, Email: haydee.benavides@citi.com

STATE BAR OF TEXAS

Office of the Chief Disciplinary Counsel

August 16, 2018 *Via Facsimile (347) 809-6937*

Citibank, N.A.
c/o Legal Service Intake Unit
701 East 60th Street
Mail Code 1251
Sioux Falls, South Dakota 57117

Re: Record Request Mario A. Mata, IOLTA; Account Number 9786201289

Dear Citibank Legal Services,

Attached please find a Subpoena request for information concerning Account Number 9786201289, Mario A. Mata, IOLTA. Details are provided on the Subpoena form. Also attached is a Business Records Affidavit for your use.

Please feel free to contact our office at 512.427.1333 if you have any questions. The affidavit and records can be returned to our office at:

State Bar of Texas
Attn: Judith DeBerry
P.O. Box 12487
Austin, Texas 78711

Thank you for your attention in this matter.

Sincerely,

Tanya Galinger
Legal Assistant
Office of the Chief Disciplinary Counsel

/tbg
Attachment

BEFORE THE EVIDENTIARY PANEL FOR
STATE BAR DISTRICT NO. 9-1 STATE BAR OF TEXAS

COMMISSION FOR LAWYER DISCIPLINE,	*	
Petitioner	*	
	*	**201800134**
V.	*	
	*	
MARIO A. MATA,	*	
Respondent	*	

THE STATE OF TEXAS
SUBPOENA DUCES TECUM

TO ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN TEXAS RULE OF CIVIL PROCEDURE 176, OR TO THE WITNESS DIRECTLY BY SERVICE PURSUANT TO T.R.C.P. 21a, AS PERMITTED BY TEXAS RULE OF DISCIPLINARY PROCEDURE 2.17H:

YOU ARE HEREBY COMMANDED TO SUMMON:

CUSTODIAN OF RECORDS
Citibank, N.A.
c/o Legal Service Intake Unit
701 E. 60th Street North
Mail Code 1251
Sioux Falls, South Dakota 57117

to produce the following records:

All records from account number 9786201289, held by Mario A. Mata, IOLTA. All records shall include but not be limited to:

1) Signature cards;
2) Any documents relating to the establishment of the account;
3) Deposit slip dated August 9, 2013, for the amount of $270,000;
4) Checks written on the account between August 9, 2013, and March 20, 2015;
5) Any document evidencing transfer of funds from the account between August 9, 2013, and March 20, 2015; and
6) All bank statements for the time period from August 1, 2013, to March 20, 2015.

These documents are to be produced to counsel for Petitioner, **Judith Gres DeBerry, Assistant Disciplinary Counsel, State Bar of Texas, P.O. Box 12487, Austin, Texas 78711** on or before **the 24th day after your receipt of this subpoena.**

Petitioner, the Commission for Lawyer Discipline, will pay the reasonable costs of producing the requested records upon receipt of a statement for those costs. This subpoena was issued at the request of Judith Gres DeBerry, Assistant Disciplinary Counsel, State Bar of Texas, 1414 Colorado, Suite 200, Austin, Texas 78701.

You are further notified that compliance with this subpoena should be discharged by providing the requested records, attached to a records affidavit in compliance with Texas Rule of Civil Procedure 902, to Judith Gres DeBerry, Assistant Disciplinary Counsel, State Bar of Texas, 1414 Colorado, Suite 200, Austin, Texas 78701.

Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both. Tex. R. Civ. P. 176.8(a).

Herein fail not, but of this writ make due return.

ISSUED on the 16th day of August, 2018.

EVIDENTIARY PANEL 9-1

By: Dirk Jordan
Dirk Jordan, Chair

MEMORANDUM OF WITNESS

I, the undersigned witness named in the subpoena, acknowledge receipt of a copy thereof, and hereby accept service of the attached subpoena and will comply with the request for documents contained therein.

_____ _____
Date Custodian of Records
Citibank N.A.

OFFICER'S RETURN

I, _____, delivered a copy of the attached witness subpoena to _____ in person at _____, in _____ County, South Dakota, on the _____ day of _____, 2018, at _____ o'clock __.m., and tendered to the witness a fee of $1.00 in cash. Cause of failure to execute this subpoena is _____.

By: _____
Person who is not a party and
is 18 years of age or older.

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of August, 2018, a true and correct copy of the above and foregoing Subpoena Duces Tecum was sent to the following parties by the indicated method:

Mario A. Mata
500 E. 4th Street, Ste. 353
Austin, Texas 78701
Via Email to mario.mata@privatewealthlaw.com

Judith Gres DeBerry

ACCOUNT# 9786201289

08/01/2013 THROUGH 03/20/2015

OFFSET TRANSACTION IMAGES

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9383 / 1131 147

5065

17 December 2013

PAY TO THE ORDER OF MARIO A. MATA IOLTA TRUST $ 75,000.00

Seventy Five Thousand & 00/100 DOLLARS

citibank

CITIBANK, N.A. BR #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO IOLTA TRUST ACCOUNT TRANSFER

⑆113193532⑆5065⑈9786201289⑈

ENDORSE HERE

Mario A. Mata, IOLTA TR

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

4787045760

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

53-9353/1131 147

5096

DATE 13 June 2014

PAY TO THE ORDER OF MARIO A MATA, PLLC $ 5,000.00

Five Thousand + NO/100 DOLLARS

citibank
CITIBANK, N.A. BR #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Arrearage Advance

⑆113193532⑆5096⑈9786 201289⑈

ENDORSE HERE

Mario A Mata, PLLC

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

11-7502223

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

68-9053 / 1131 147

5035

DATE 21 NOV 2014

PAY TO THE ORDER OF MARIO A. MATA IOLTA TRUST $ 275.00

TWO HUNDRED SEVENTY FIVE + 00/100 DOLLARS

citibank
CITIBANK, N.A. BR. #147
3404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Transfer law firm Balance

⑆113193532⑆ 5035⑈ 9786201289⑈

4786857757

PAY TO THE ORDER OF
WELLS FARGO BANK, N.A.
⑆121000248⑆
FOR DEPOSIT ONLY
MARIO A. MATA IOLTA
7874171850

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9363 / 1131 147

5099

DATE 5/ December 20[illegible]

PAY TO THE ORDER OF MARIO A MATA PLLC $ 20.[illegible]

Twenty & no/100 DOLLARS

citibank
CITIBANK, N.A. BR. #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Transfer - Balance of Old Acct

⑆113193532⑆5099⑈9786201289⑈

4786379166

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9353 / 1131 147

5005

DATE 12/30/2014

PAY TO THE ORDER OF MARIO A MATA PLLC $ 3.00

Three & NO/100 DOLLARS

citibank

CITIBANK, N.A. BR. #147
8401 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO CLOSE DALLAS IOLTA ACCT

⑆113193532⑆5005⑈9786201289⑈

4787048892

011

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

60-0153 / 1131 147

5097

DATE 1 July, 2014

PAY TO THE ORDER OF MARIO A. MATA, LLP $ 3,000.00

Three Thousand + NO/100 DOLLARS

citibank

CITIBANK, N.A. BR. #147
3404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Filed

⑆113193532⑆ 5097 ⑈ 9786 201289⑈

ENDORSE HERE

For Deposit Only Pay to the Order of the Within Named Payee

012

MARIO A MATA IOLTA
S-100117180927
ACCOUNT: 9786201289
LSI-08162018767 66B

SUBPOENA PROCESSING UNIT

WE HAVE COMPLETED YOUR REQUEST FOR THE RECORDS WITH THE FOLLOWING EXCEPTIONS:

	DATE	ITEM	AMOUNT	REASON
1	8/21/2013	Withdrawal	$7,500.00	Not Found on offsite warehouse (Iron Mountain), transfer to acct xxxx4759
2	10/7/2013	Withdrawal	$7,500.00	Not Found on offsite warehouse (Iron Mountain), transfer to acct xxxx4759
3	2/28/2014	Withdrawal	$5,000.00	Not Found on offsite warehouse (Iron Mountain), transfer to acct xxxx4759
4	6/4/2014	Withdrawal	$3,500.00	Not Found on offsite warehouse (Iron Mountain), transfer to acct xxxx4759

Deposit Ticket

Date: 8/9/13 Check your type of account below

Deposit to: 28 ☒ Checking ☐ Money Market Account

Deposit to: 25 ☐ Savings ☐ Passbook Savings ☐ Certificate of Deposit ☐ Market Rate Account

Checks and other items are received for deposit subject to the applicable account rules and regulations. Deposits may not be available for immediate withdrawal.

Account Name MARIO Mata LLP IOLT Trust A.

Address 2404 Cedar Spring Rd

Sign here for cash received* (Not required for ATM deposits)

Account Number ★ 9 7 8 6 2 0 1 2 8 9

▲ START WITH ACCOUNT NUMBER HERE

citibank

	DOLLARS	CENTS
Cash		
Coin		
Currency		
1		
2		
3		
4		
5		
Subtotal		
*Less Cash Received		
TOTAL ▶ $	270,000.XX	

▲ WRITE NUMBERS IN SHADED BOXES

⑈856068415 ⑆5777⑈1028⑆

Transaction Receipt / Funds Availability Notice

CKG: DEPOSIT 08/09/13 17:03 FC#00148 FA# 002
065-01 Acct# xxxxxxx289 $270,000.00 ONL

Funds from your deposit/check cashing transaction will be delayed. Reasons and funds availability schedule follow.

$250.00	Available Today
$99,800	08/10/13 Standard delay
$169,950	08/13/13 Total check(s) deposited/cashed on this day exceed $100,000.

Thank you for banking with Citibank. citibank

X
Customer Signature(s)

THE MOSER FAMILY TRUST
1506 OAK KNOLL
DALLAS, TX 75208

88-2323
1119
1456407

1132

DATE 8/8/13

PAY TO THE ORDER OF Moro A. Moro LLP IOLT Trust Acct $ 270,000.xx

Two hundred seventy thousand and 00/100 DOLLARS

LONGVIEW BANK & TRUST
300 E. WHALEY, P.O. BOX 3168
LONGVIEW, TEXAS 75606
903-237-5500

MEMO

J. A. Moser

⑆111923238⑆ 1132 14 5640 7⑈

ENDORSE HERE

CKG: WITHDRAWAL 08/12/13 13:46 FC# 00191 FA# 003SUP#006
014-03 Acct# xxxxxxx289 $7,500.00 ONL PIC
On deposit: $262,501.74 Available Now: $92,551.74

citibank®

X

Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

Transfer to acct ~~xx~~ 4759

Transaction Receipt / Funds Availability Notice

CKG: DEPOSIT .08/16/13 12:15 FC#00191 FA# 003
012-03 Acct# xxxxxxx759 .$3,611.87 ONL PIC

Thank you for banking with Citibank. citibank®

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

Transfer of Funds to acct xxx 4759

2

CKG: WITHDRAWAL 08/30/13 14:46 FC#00191 FA# 003SUP#011
019-02 Acct# xxxxxxx289 $7,500.00 ONL PIC
On deposit: $243,889.87 Available Now: $243,889.87

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

4. Transfer to acct xxx 4759

CKG: WITHDRAWAL 09/04/13 16:56 FC#00191 FA# 003SUP#006
016-02 Acct# xxxxxxx289 $7,500.00 DNL PIC
On deposit: $236,389.87 Available Now: $236,389.87

Transfer to acct ## 4759

citibank®

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

5

CKG: WITHDRAWAL 09/30/13 14:01 FC#00191 FA# 003SUP#007
016-02 Acct# xxxxxxx289 $10,000.00 ONL PIC
On deposit: $226,389.87 Available Now: $226,389.87

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer-Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

6

Transfer of Funds to
Acct 4759

CKG: WITHDRAWAL 10/15/13 15:53 FC#00191 FA# 004SUP#010
004-02 Acct# xxxxxxx289 $7,500.00 ONL

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

Transfer of Funds to acct xxxx 4759

8

CKG: WITHDRAWAL 10/30/13 17:08 FC#00392 FA# 011
023-02 Acct# xxxxxxxx289 $5,000.00 ONL PIC
On deposit: $206,389.87 Available Now: $206,389.87

citi

5000

citibank

X:
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

Transfer of Funds to acct xxxx 4759

9

CKG: WITHDRAWAL 11/04/13 15:48 FC#00191FA# 003
023-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $201,389.87 Available Now: $201,389.87

Transfer to
acct xxxx 4759

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

10

CKG: WITHDRAWAL 11/20/13 15:03 FC#00191FA# 003SUP#010
008-02 Acct# xxxxxxx289 $7,500.00 ONL PIC
On deposit: $193,889.87 Available Now: $193,889.87

citibank

X

Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

11

Transfer to acct

XXX 4759

CKG: WITHDRAWAL 11/27/13 14:15 FC#00191FA# 003
017-02 Acct# xxxxxxx289 $3,500.00 ONL PIC
On deposit: $190,389.87 Available Now: $190,389.87

Transfer of Funds
to acct xxxx 4759

citibank®

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

12

CKG: WITHDRAWAL 12/07/13 12:56 FC#00191FA# 003
020-02 Acct# xxxxxxx289 $3,500.00 ONL PIC
On deposit: $186,889.87 Available Now: $186,889.87

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

13 Transfer of funds to acct xx 4759

CKG: WITHDRAWAL 12/13/13 14:32 FC#00191FA# 003
028-02 Acct# xxxxxxx289 $3,500.00 ONL PIC
On deposit: $183,389.87 Available Now: $183,389.87

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

Transfer of Funds
to acct xxx4759

14

CKG: WITHDRAWAL 12/27/13 11:55 FC#00191FA# 003
009-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $178,389.87 Available Now: $178,389.87

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

15. Transfer to acct
~~XX~~4759

CKG: WITHDRAWAL 01/03/14 16:43 FC#00191FA# 003
049-02 Acct# xxxxxxx289 $ 591.87 ONL PIC
On deposit: $99,798.00 Available Now: $99,798.00

citi

citibank

X.
Customer Signature(s)

☐ Identification #/ Exp ☐ Customer Known ☐ Identification #/-Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/08) PKG 400

Branch Copy

Transfer of Funds
to acct xxx4759

16

CKG: WITHDRAWAL 01/06/14 15:48 FC#00191FA# 003
052-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $94,798.00 Available Now: $94,798.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

Transfer of funds to acct ~~xxx~~ 4759

17

CKG: WITHDRAWAL 01/13/14 16:30 FC#00191FA# 003
041-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $89,798.00 Available Now: $89,798.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

18

Transfer of funds
to acct xxx 4759

CKG: WITHDRAWAL 01/16/14 17:06 FC#00392 FA# 011
030-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $84,798.00 Available Now: $84,798.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

19

Transfer of Funds
to acct xxx 4759

CKG: WITHDRAWAL 01/31/14 14:28 FC#00191FA# 003SUP#015
022-02 Acct# xxxxxxx289 DG 000.00 ONL PIC
On deposit: $78,798.00 Available Now: $78,798.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

210

Transfer of Funds
to acct XXXX 4759

CKG: WITHDRAWAL 02/05/14 14:13 FC#00191FA# 003
019-02 Acct# xxxxxxx289 $3,500.00 ONL PIC
On deposit: $75,298.00 Available Now: $75,298.00

citi

citibank

Transfer of Funds
to acct xxxx 4759

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

21

CKG: WITHDRAWAL 02/14/14 16:00 00191 FA# 004 X 100.0
014-02 Acct# xxxxxxx289 RUNNING TOTAL 500.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

22

Transfer of Funds to
acct xxxx4759

CKG: WITHDRAWAL 02/21/14 15:35 FC#00191FA# 003
020-02 Acct# xxxxxxx289 $3,500.00 ONL PIC
On deposit: $68,298.00 Available Now: $68,298.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

23 Transfer of Funds to acct xxx4759.

CKG: WITHDRAWAL 03/06/14 14:04 FC#00191FA# 003
014-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $58,298.00 Available Now: $58,298.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

Transfer of Funds to acct xxx4759

25

CKG: WITHDRAWAL 03/13/14 13:57 FC#00191 FA# 008
018-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
Dep deposit: $53,298.00 Available Now: $53,298.00

citi

citibank

X

Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/06) PKG 400

Branch Copy

Transfer of Funds to acct xx4759

26

CKG: WITHDRAWAL 03/18/14 16:58 FC# 00191 FA# 008
011-02 Acct# xxxxxxx289 $3,500.00 ONL PIC
On deposit: $49,798.00 Available Now: $49,798.00

citi

citibank

X
Customer Signature(s)

9786201289

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

Transfer of Funds
to acct xxx 4759

27

CKG: WITHDRAWAL 03/29/14 12:56 FC#00191FA# 003
021-02 Acct#.xxxxxxx289 $5,000.00 ONL PIC
On deposit: $44,798.00 Available Now: $44,798.00

citi

citibank

X:
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

TEM NBF2000 (Rev. 07/09) PKG 400

Branch Copy

Transfer of Funds to acct xxx 4759

28

CKG: WITHDRAWAL 04/04/14 16:13 FC#00191FA# 003SUP#010
034-02 Acct# xxxxxxx289 $7,500.00 ONL PIC
On deposit: $37,298.00 Available Now: $37,298.00

citi

citibank

Transfer of Funds to acct xxx4759

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

29

CKG: WITHDRAWAL 04/23/14 14:00 00191 FA# 026
003-02 Acct# xxxxxxx289
On deposit $32,298.00 Available Now

citi

citibank

X
Customer Signature(s)

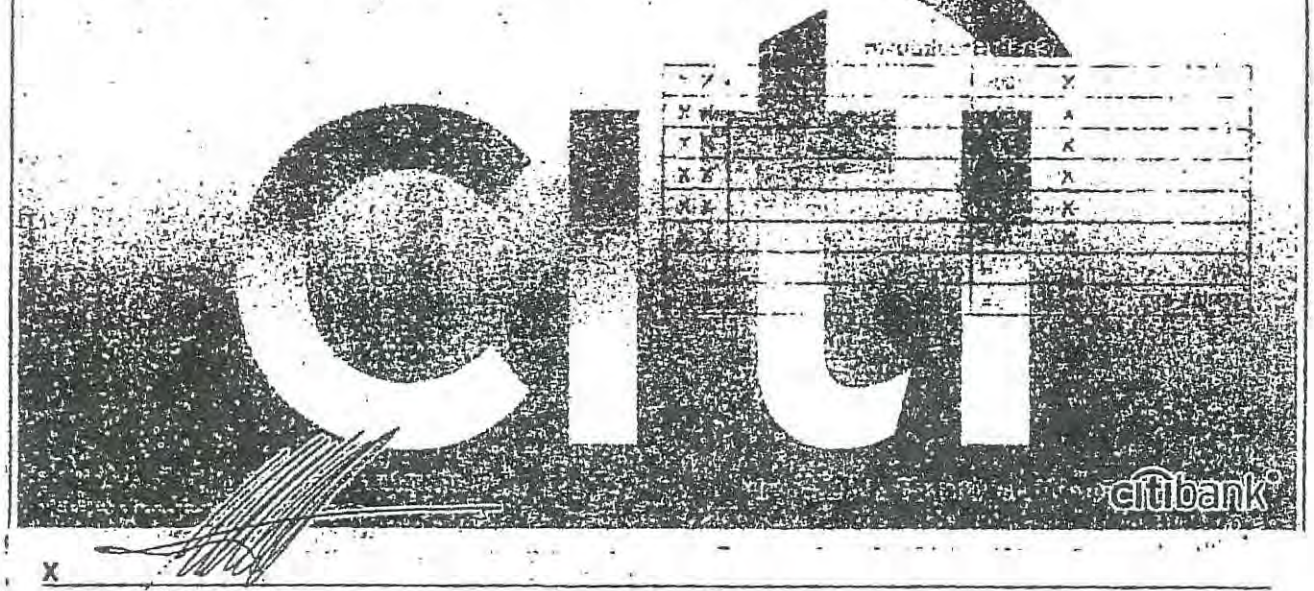
☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

30

Transfer of Funds to
acct xxx4759

CKG:: WITHDRAWAL 05/02/14 16:04 FC#00191FA# 003
021-01 Acct# xxxxxxx289 $5,000.00 ONL



X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PK3 400

Branch Copy

Transfer of funds to acct xxxx4759

31

CKG: WITHDRAWAL 05/06/14 13:08 FC#00191 FA# 004
025-02 Acct# xxxxxxx289 $5,000.00 ONL PIC
On deposit: $22,298.00 Available Now: $22,298.00

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known

☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

Transfer of Funds
32 to acct xxx 4759

CKG: WITHDRAWAL 05/27/14 15:22 FC#00191FA# 003
027-01 Acct# xxxxxxx289 $5,500.00 ONL

citi

citibank

X

Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 4007 Branch Copy

Transfer of Funds to acct XX 4759

33

CKG: WITHDRAWAL 05/31/14 12:56 FC# 00191 FA# 003
015-01 Acct# xxxxxxx289 $3,500.00 ONL

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400

Branch Copy

34

Transfer of Funds
to acct xxx 4789

CKG: WITHDRAWAL 06/09/14 13:03 FC#00191FA# 003
022-01 Acct# xxxxxxx289 $7,500.00 ONL

citi

citibank

X
Customer Signature(s)

☐ Identification # / Exp ☐ Customer Known ☐ Identification # / Exp ☐ Customer Known

ITEM NSF2000 (Rev. 07/09) PKG 400 Branch Copy

36

Transfer of Funds
to acct xxxx 4759

citi

AFFIDAVIT

STATE OF TEXAS)

)SS:

COUNTY OF BEXAR)

I, Haydee Benavides, do hereby state and declare as follows:

1. I am employed by Citigroup Management Corp. (hereinafter "CMC"). The testimony in this affidavit is based upon my review of documents maintained in the ordinary course of business, and to the best of my knowledge, the facts contained herein are true and correct.
2. CMC provides various services, one of which is subpoena compliance, to Citibank, N.A. (hereinafter "Citibank").
3. The accounts in question are or were owned and issued by Citibank.
4. Citibank provides CMC employees access to its account records to perform various services.
5. I am a duly authorized custodian of the records for Citibank and have authority to certify the attached records.
6. The attached records are copies or duplicates of the available records requested in the Subpoena with redacted information.
7. The attached records were prepared in the ordinary course of business at or near the time of the act, condition or event.
8. Documents in reference to **Mario A. Martin, # 201800134, Citi reference# LSI-08162018-76766.**

I certify under penalty of perjury that the foregoing is true and correct. Executed on September 21, 2018 at San Antonio, TX.

Haydee Benavides

Haydee Benavides, Legal Support Specialist
Citigroup Management Corp.

Subscribed and sworn to before me on September 21, 2018.

SEAL

M. YVETTE GUTIERREZ
Notary ID #125232782
My Commission Expires
September 13, 2021

M. Yvette Gutierrez

Notary Public

My commission expires 9-13-21

Petitioner's Exhibit

8

Citi Consumer Subpoena Compliance Unit on behalf of Citibank N.A., 100 Citibank Drive, Bldg. 1, Floor 2, San Antonio, TX 78245-3214
Tel: 210-677-1936, Fax: 210-881-6601, Email: haydee.benavides@citi.com

Compliance DataBase - Account Details for Signer # 1

Account Number :	9786201289
Last Name :	MATA
First Name, MI :	MARIO
Business Name :	-
Date of Birth :	-
SSN/Tax ID :	742-35-4575
Tax ID Indicator :	T
Employee Indicator :	-
CIN :	
Account Open Date :	10/06/2009
Account Close Date :	-
Account Status :	OPEN
FIMP / Financial Center :	CTX / 147
Service Code :	CHK - CHECKING
Entity Code :	COMMERCIAL
Business Source Code :	82
Address :	100 CRESCENT CT DALLAS TX 75201-1832
Home Ph :	
Business Ph :	214-459-3395
Risk Indicator :	

Signer Name	Signer#
MARIO A MATA	#1

ACCOUNT# 9786201289

08/09/2013 THROUGH 03/31/2015

OFFSET TRANSACTION IMAGES

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

86-9353 / 1131 147

5065

DATE 17 December 2013

PAY TO THE ORDER OF MARIO A. MATA IOLTA TRUST $ 75,000.00

Seventy Five Thousand and 00/100 DOLLARS

citibank
CITIBANK, N.A. BR. #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO IOLTA TRUST ACCOUNT TRANSFER

⑆113193532⑆ 5065 ⑈ 9786 20 1289 ⑈

ENDORSE HERE

Mario A. Mata IOLTA TA

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

4787045760

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9353 / 1131 147

5096

DATE 13 June 2014

PAY TO THE ORDER OF MARIO A MATA, PLLC $ 5,000.00

Five Thousand + NO/100 DOLLARS

citibank
CITIBANK, N.A. BR #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Asset Advance

⑆113193532⑆ 5096 ⑈9786201289⑈

ENDORSE HERE

Mario A Mata, PLLC

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE

11-7502223

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9353 / 1131 147

5035

DATE 21 NOV 2014

PAY TO THE ORDER OF MARIO A. MATA IOLTA TRUST $ 275.00

Two Hundred Seventy Five + 00/100 DOLLARS

citibank

CITIBANK, N.A. BR. #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Transfer law firm fee income

⑆113193532⑆5035⑈9786201289⑈

4786857757

PAY TO THE ORDER OF
WELLS FARGO BANK, N.A.
⑆111900659⑆
FOR DEPOSIT ONLY
MARIO A. MATA IOLTA
⑈7874171860⑈

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9353 / 1131 147

5099

DATE 5/ December-2024

PAY TO THE ORDER OF MARIO A MATA PLLC $ 20.17

Twenty & 17/100 DOLLARS

citibank
CITIBANK, N.A. BR. #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO Trans- Balance of Old Acct

⑆113193532⑆ 5099 ⑈9786201289⑈

4786379166

MARIO A. MATA IOLTA TRUST
100 CRESCENT CT., STE. 700
DALLAS, TX 75201

88-9353 / 1131 147

5005

DATE 12/30/2014

PAY TO THE ORDER OF MARIO A MATA PLLC $ 3.00

Three & No/100 DOLLARS

citibank
CITIBANK, N.A. BR. #147
2404 CEDAR SPRINGS RD
DALLAS, TX 75201

MEMO CLOSE DALLAS IOLTA ACCT

⑆113193532⑆5005⑈9786201289⑈

4787048892

Deposit Ticket

Date: 8/9/13 Check your type of account below

citibank

Deposit to: 28 ☒ Checking ☐ Money Market Account

Deposit to: 25 ☐ Savings ☐ Certificate of Deposit ☐ Passbook Savings ☐ Market Rate Account

Checks and other items are received for deposit subject to the applicable account rules and regulations. Deposits may not be available for immediate withdrawal.

Account Name MARIO MATA LLP/OLT Trust A.

Address 2404 Cedar Spring Rd

Sign here for cash received* (Not required for ATM deposits)

Account Number * 9 7 8 6 2 0 1 2 8 9

▲ START RIGHT ACCOUNT NUMBER HERE

	DOLLARS	CENTS
Cash		
1		
2		
3		
4		
5		
Subtotal		
*Less Cash Received		
TOTAL ▶ $ -	270,000.	XX

▲ WRITE NUMBERS IN SHADED BOXES

⑈856068445 ⑆5777⑈1028⑆

Transaction Receipt / Funds Availability Notice

CKG: DEPOSIT 08/09/13 17:03 FC#00148 FA# 002
065-01 Acct# xxxxxxx289 $270,000.00 ONL

Funds from your deposit/check cashing transaction will be delayed. Reasons and funds availability schedule follow.

$250.00	Available Today
$99.800	08/10/13 Standard delay
$169.950	08/13/13 Total check(s) deposited/cashed on this day exceed $100.000.

Thank you for banking with Citibank. citibank

X

Customer Signature(s)

600

THE MOSER FAMILY TRUST
1506 OAK KNOLL
DALLAS, TX 75208

88-2323
1119
1456407

1132

DATE 8/8/13

PAY TO THE ORDER OF Moser A. Moser LLP IOLT Trust Acct $ 270,000.xx

Two hundred seventy thousand and 00/100 DOLLARS

LONGVIEW BANK & TRUST
300 E. WHALEY, P.O. BOX 3168
LONGVIEW, TEXAS 75606
903-237-5500

MEMO

J. T. Moser

⑆111923238⑆ 1132 14 5640 7⑈

ENDORSE HERE

Citibank CBO Services 147
P.O. Box 769018
San Antonio, Texas 78245

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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Aug 1 - Aug 31, 2013

CitiEscrow CONTROL ACCOUNT DETAIL FROM AUG 1, 2013 THRU AUG 31, 2013

CitiEscrow Control Checking

9786201289

Beginning Balance:	$1.74
Ending Balance:	$243,889.87

Date	Description	Debits	Credits	Balance
08/09	DEPOSIT		270,000.00	270,001.74
08/12	WITHDRAWAL	7,500.00		262,501.74
08/16	WITHDRAWAL	3,611.87		258,889.87
08/21	WITHDRAWAL	7,500.00		251,389.87
08/30	WITHDRAWAL	7,500.00		243,889.87
08/30	INTEREST EARNED		66.20	243,956.07
08/30	INTEREST DEBIT	66.20		243,889.87
	Total Debits/Credits	**26,178.07**	**270,066.20**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
8/01 - 8/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	190,476.25
Average Collected Balance this Statement Period	155,637.54
Total Interest Earned Since Jan 1	88.18

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CUSTOMER SERVICE INFORMATION

IF YOU HAVE QUESTIONS ON:	YOU CAN CALL:	YOU CAN WRITE:
Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

Citibank CBO Services 147
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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Sep 1 - Sep 30, 2013

CitiEscrow CONTROL ACCOUNT DETAIL FROM SEP 1, 2013 THRU SEP 30, 2013

CitiEscrow Control Checking

9786201289

Beginning Balance:	$243,889.87
Ending Balance:	$226,389.87

Date	Description	Debits	Credits	Balance
09/04	WITHDRAWAL	7,500.00		236,389.87
09/30	WITHDRAWAL	10,000.00		226,389.87
09/30	INTEREST EARNED		97.34	226,487.21
09/30	INTEREST DEBIT	97.34		226,389.87
	Total Debits/Credits	**17,597.34**	**97.34**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
9/01 - 9/30	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	236,806.53
Average Collected Balance this Statement Period	236,806.53
Total Interest Earned Since Jan 1	185.52

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CUSTOMER SERVICE INFORMATION

IF YOU HAVE QUESTIONS ON:	YOU CAN CALL:	YOU CAN WRITE:
Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

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MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Oct 1 - Oct 31, 2013

CitiEscrow CONTROL ACCOUNT DETAIL FROM OCT 1, 2013 THRU OCT 31, 2013

CitiEscrow Control Checking

9786201289

Beginning Balance:	$226,389.87
Ending Balance:	$206,389.87

Date	Description	Debits	Credits	Balance
10/07	WITHDRAWAL	7,500.00		218,889.87
10/15	WITHDRAWAL	7,500.00		211,389.87
10/30	WITHDRAWAL	5,000.00		206,389.87
10/31	INTEREST EARNED		91.71	206,481.58
10/31	INTEREST DEBIT	91.71		206,389.87
	Total Debits/Credits	**20,091.71**	**91.71**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
10/01 - 10/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	215,905.99
Average Collected Balance this Statement Period	215,905.99
Total Interest Earned Since Jan 1	277.23

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CUSTOMER SERVICE INFORMATION

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MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Nov 1 - Nov 30, 2013

CitiEscrow CONTROL ACCOUNT DETAIL FROM NOV 1, 2013 THRU NOV 30, 2013

CitiEscrow Control Checking

9786201289

Beginning Balance:	$206,389.87
Ending Balance:	$190,389.87

Date	Description	Debits	Credits	Balance
11/04	WITHDRAWAL	5,000.00		201,389.87
11/20	WITHDRAWAL	7,500.00		193,889.87
11/27	WITHDRAWAL	3,500.00		190,389.87
11/29	INTEREST EARNED		81.66	190,471.53
11/29	INTEREST DEBIT	81.66		190,389.87
	Total Debits/Credits	**16,081.66**	**81.66**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
11/01 - 11/30	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	198,673.20
Average Collected Balance this Statement Period	198,673.20
Total Interest Earned Since Jan 1	358.89

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CUSTOMER SERVICE INFORMATION

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Control Account:
9786201289
Statement Period
Dec 1 - Dec 31, 2013

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

CitiEscrow CONTROL ACCOUNT DETAIL FROM DEC 1, 2013 THRU DEC 31, 2013

CitiEscrow Control Checking

9786201289

Beginning Balance:	$190,389.87
Ending Balance:	$103,389.87

Date	Description	Debits	Credits	Balance
12/09	WITHDRAWAL	3,500.00		186,889.87
12/13	WITHDRAWAL	3,500.00		183,389.87
12/27	WITHDRAWAL	5,000.00		178,389.87
12/30	CHECK NO: 5065	75,000.00		103,389.87
12/31	INTEREST EARNED		76.46	103,466.33
12/31	INTEREST DEBIT	76.46		103,389.87
	Total Debits/Credits	**87,076.46**	**76.46**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
12/01 - 12/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	180,002.77
Average Collected Balance this Statement Period	180,002.77
Total Interest Earned Since Jan 1	435.35

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CUSTOMER SERVICE INFORMATION

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MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Jan 1 - Jan 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM JAN 1, 2014 THRU JAN 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$103,389.87
Ending Balance:	$78,798.00

Date	Description	Debits	Credits	Balance
01/03	WITHDRAWAL	3,591.87		99,798.00
01/06	WITHDRAWAL	5,000.00		94,798.00
01/13	WITHDRAWAL	5,000.00		89,798.00
01/16	WITHDRAWAL	5,000.00		84,798.00
01/31	WITHDRAWAL	6,000.00		78,798.00
01/31	INTEREST EARNED		16.99	78,814.99
01/31	INTEREST DEBIT	16.99		78,798.00
	Total Debits/Credits	**24,608.86**	**16.99**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
1/01 - 1/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	89,997.47
Average Collected Balance this Statement Period	89,997.47
Total Interest Earned Since Jan 1	16.99

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CUSTOMER SERVICE INFORMATION

IF YOU HAVE QUESTIONS ON:	YOU CAN CALL:	YOU CAN WRITE:
Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

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MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Feb 1 - Feb 28, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM FEB 1, 2014 THRU FEB 28, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance: $78,798.00
Ending Balance: $63,298.00

Date	Description	Debits	Credits	Balance
02/05	WITHDRAWAL	3,500.00		75,298.00
02/14	WITHDRAWAL	3,500.00		71,798.00
02/21	WITHDRAWAL	3,500.00		68,298.00
02/28	WITHDRAWAL	5,000.00		63,298.00
02/28	INTEREST EARNED		11.16	63,309.16
02/28	INTEREST DEBIT	11.16		63,298.00
	Total Debits/Credits	**15,511.16**	**11.16**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
2/01 - 2/28	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	72,744.42
Average Collected Balance this Statement Period	72,744.42
Total Interest Earned Since Jan 1	28.15

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CUSTOMER SERVICE INFORMATION

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MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Mar 1 - Mar 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM MAR 1, 2014 THRU MAR 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$63,298.00
Ending Balance:	$44,798.00

Date	Description	Debits	Credits	Balance
03/06	WITHDRAWAL	5,000.00		58,298.00
03/13	WITHDRAWAL	5,000.00		53,298.00
03/18	WITHDRAWAL	3,500.00		49,798.00
03/31	WITHDRAWAL	5,000.00		44,798.00
03/31	INTEREST EARNED		9.22	44,807.22
03/31	INTEREST DEBIT	9.22		44,798.00
	Total Debits/Credits	**18,509.22**	**9.22**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
3/01 - 3/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	54,298.00
Average Collected Balance this Statement Period	54,298.00
Total Interest Earned Since Jan 1	37.37

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CUSTOMER SERVICE INFORMATION

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Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Apr 1 - Apr 30, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM APR 1, 2014 THRU APR 30, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$44,798.00
Ending Balance:	$32,298.00

Date	Description	Debits	Credits	Balance
04/04	WITHDRAWAL	7,500.00		37,298.00
04/23	WITHDRAWAL	5,000.00		32,298.00
04/30	INTEREST EARNED		6.04	32,304.04
04/30	INTEREST DEBIT	6.04		32,298.00
	Total Debits/Credits	**12,506.04**	**6.04**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
4/01 - 4/30	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	36,714.66
Average Collected Balance this Statement Period	36,714.66
Total Interest Earned Since Jan 1	43.41

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CUSTOMER SERVICE INFORMATION

IF YOU HAVE QUESTIONS ON:	YOU CAN CALL:	YOU CAN WRITE:
Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
May 1 - May 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM MAY 1, 2014 THRU MAY 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$32,298.00
Ending Balance:	$18,798.00

Date	Description	Debits	Credits	Balance
05/02	WITHDRAWAL	5,000.00		27,298.00
05/06	WITHDRAWAL	5,000.00		22,298.00
05/27	WITHDRAWAL	3,500.00		18,798.00
05/30	INTEREST EARNED		3.86	18,801.86
05/30	INTEREST DEBIT	3.86		18,798.00
	Total Debits/Credits	**13,503.86**	**3.86**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
5/01 - 5/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	22,701.22
Average Collected Balance this Statement Period	22,701.22
Total Interest Earned Since Jan 1	47.27

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CUSTOMER SERVICE INFORMATION

IF YOU HAVE QUESTIONS ON:	YOU CAN CALL:	YOU CAN WRITE:
Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Jun 1 - Jun 30, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM JUN 1, 2014 THRU JUN 30, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$18,798.00
Ending Balance:	$3,298.00

Date	Description	Debits	Credits	Balance
06/02	WITHDRAWAL	3,500.00		15,298.00
06/04	WITHDRAWAL	3,500.00		11,798.00
06/09	WITHDRAWAL	3,500.00		8,298.00
06/16	CHECK NO: 5096	5,000.00		3,298.00
06/30	INTEREST EARNED		1.18	3,299.18
06/30	INTEREST DEBIT	1.18		3,298.00
	Total Debits/Credits	**15,501.18**	**1.18**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
6/01 - 6/30	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	7,198.00
Average Collected Balance this Statement Period	7,198.00
Total Interest Earned Since Jan 1	48.45

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CUSTOMER SERVICE INFORMATION

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Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

Citibank CBO Services 147
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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Jul 1 - Jul 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM JUL 1, 2014 THRU JUL 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$3,298.00
Ending Balance:	$298.00

Date	Description	Debits	Credits	Balance
07/02	CHECK NO: 5097	3,000.00		298.00
07/31	INTEREST EARNED		0.07	298.07
07/31	INTEREST DEBIT	0.07		298.00
	Total Debits/Credits	**3,000.07**	**0.07**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
7/01 - 7/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	394.77
Average Collected Balance this Statement Period	394.77
Total Interest Earned Since Jan 1	48.52

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CUSTOMER SERVICE INFORMATION

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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Aug 1 - Aug 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM AUG 1, 2014 THRU AUG 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$298.00
Ending Balance:	$298.00

Date	Description	Debits	Credits	Balance
08/29	INTEREST EARNED		0.05	298.05
08/29	INTEREST DEBIT	0.05		298.00
	Total Debits/Credits	**0.05**	**0.05**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
8/01 - 8/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	298.00
Average Collected Balance this Statement Period	298.00
Total Interest Earned Since Jan 1	48.57

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CUSTOMER SERVICE INFORMATION

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CITIBANK, N. A.

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Sep 1 - Sep 30, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM SEP 1, 2014 THRU SEP 30, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$298.00
Ending Balance:	$298.00

Date	Description	Debits	Credits	Balance
09/30	INTEREST EARNED		0.05	298.05
09/30	INTEREST DEBIT	0.05		298.00
	Total Debits/Credits	**0.05**	**0.05**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
9/01 - 9/30	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	298.00
Average Collected Balance this Statement Period	298.00
Total Interest Earned Since Jan 1	48.62

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CUSTOMER SERVICE INFORMATION

IF YOU HAVE QUESTIONS ON:	YOU CAN CALL:	YOU CAN WRITE:
Escrow Deposit Account	877-528-0990 (For Speech and Hearing Impaired Customers Only TDD: 800-945-0258)	CitiBusiness 100 Citibank Drive San Antonio, TX 78245-9966

For change in address, call your account officer or visit your branch.

Citibank CBO Services 147
P.O. Box 769018
San Antonio, Texas 78245

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AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Oct 1 - Oct 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM OCT 1, 2014 THRU OCT 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$298.00
Ending Balance:	$298.00

Date	Description	Debits	Credits	Balance
10/31	INTEREST EARNED		0.05	298.05
10/31	INTEREST DEBIT	0.05		298.00
	Total Debits/Credits	**0.05**	**0.05**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
10/01 - 10/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	298.00
Average Collected Balance this Statement Period	298.00
Total Interest Earned Since Jan 1	48.67

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CUSTOMER SERVICE INFORMATION

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CITIBANK, N. A.

Control Account:
9786201289
Statement Period
Nov 1 - Nov 30, 2014

MARIO A. MATA IOLTA TRUST
ATTORNEY TRUST
2804 HUBBARD CIRCLE
AUSTIN TX 78746

CitiEscrow CONTROL ACCOUNT DETAIL FROM NOV 1, 2014 THRU NOV 30, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$298.00
Ending Balance:	$23.00

Date	Description	Debits	Credits	Balance
11/24	CHECK NO: 5035	275.00		23.00
11/28	INTEREST EARNED		0.04	23.04
11/28	INTEREST DEBIT	0.04		23.00
	Total Debits/Credits	**275.04**	**0.04**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
11/01 - 11/30	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	233.83
Average Collected Balance this Statement Period	233.83
Total Interest Earned Since Jan 1	48.71

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CUSTOMER SERVICE INFORMATION

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AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Dec 1 - Dec 31, 2014

CitiEscrow CONTROL ACCOUNT DETAIL FROM DEC 1, 2014 THRU DEC 31, 2014

CitiEscrow Control Checking

9786201289

Beginning Balance:	$23.00
Ending Balance:	$0.00

Date	Description	Debits	Credits	Balance
12/08	CHECK NO: 5099	20.00		3.00
12/31	CHECK NO: 5005	3.00		0.00
	Total Debits/Credits	**23.00**	**0.00**	

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
12/01 - 12/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	7.41
Average Collected Balance this Statement Period	7.41
Total Interest Earned Since Jan 1	48.71

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CUSTOMER SERVICE INFORMATION

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2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Jan 1 - Jan 31, 2015

CitiEscrow CONTROL ACCOUNT DETAIL FROM JAN 1, 2015 THRU JAN 31, 2015

CitiEscrow Control Checking

9786201289

Beginning Balance:	$0.00
Ending Balance:	$0.00

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
1/01 - 1/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	0.00
Average Collected Balance this Statement Period	0.00

CUSTOMER SERVICE INFORMATION

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AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Feb 1 - Feb 28, 2015

CitiEscrow CONTROL ACCOUNT DETAIL FROM FEB 1, 2015 THRU FEB 28, 2015

CitiEscrow Control Checking

9786201289

Beginning Balance:	$0.00
Ending Balance:	$0.00

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
2/01 - 2/28	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	0.00
Average Collected Balance this Statement Period	0.00

CUSTOMER SERVICE INFORMATION

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2804 HUBBARD CIRCLE
AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Mar 1 - Mar 20, 2015

CitiEscrow CONTROL ACCOUNT DETAIL FROM MAR 1, 2015 THRU MAR 20, 2015

CitiEscrow Control Checking

9786201289

Beginning Balance:	$0.00
Ending Balance:	$0.00

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
3/01 - 3/20	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	0.00
Average Collected Balance this Statement Period	0.00

CUSTOMER SERVICE INFORMATION

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AUSTIN TX 78746

Control Account:
9786201289
Statement Period
Mar 21 - Mar 31, 2015

CitiEscrow CONTROL ACCOUNT DETAIL FROM MAR 21, 2015 THRU MAR 31, 2015

CitiEscrow Control Checking

9786201289

Beginning Balance:	$0.00
Ending Balance:	$0.00

Your CitiEscrow Control Checking Account Rates		
For Balances of:	$0 to $99,999	$100,000 and over
3/21 - 3/31	0.200%	0.500%

Average Balance Information

Average Ledger Balance this Statement Period	0.00
Average Collected Balance this Statement Period	0.00

CUSTOMER SERVICE INFORMATION

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