

investments in the amounts listed in the Appendix column “Proceeds from Former Stanford Employee’s CD(s) Received in Excess of Investments.”

3. For the reasons stated in the Second Amended Complaint, which are incorporated herein, the Receiver requests the same relief as to the amounts listed in the Appendix as he did for the other categories of CD Proceeds identified in the Second Amended Complaint — namely Loans, SIBL CD Commissions, SIBL Quarterly Bonuses, Performance Appreciation Rights Plan (“PARS”) Payments, Branch Managing Director Quarterly Compensation, and Severance Payments.

4. The 99 Former Stanford Employees listed in the Appendix are also similarly situated to the Stanford Investors named in the Receiver’s First Amended Complaint Against Certain Stanford Investors (Doc. 128) and the Appendix in support thereof (Doc. 129) (collectively, the “First Amended Complaint”). The allegations and reasoning of the First Amended Complaint are, therefore, incorporated herein.

PRAYER

5. The Receiver respectfully requests the following:

- (a) An Order providing that CD Proceeds received directly or indirectly by the Former Stanford Employees from fraudulent CDs were fraudulent transfers under applicable law or, in the alternative, that the Former Stanford Employees were unjustly enriched by CD Proceeds received directly or indirectly from fraudulent CDs;
- (b) An Order providing that CD Proceeds received directly or indirectly by the Former Stanford Employees from fraudulent CDs are property of the Receivership Estate;

- (c) An Order providing that CD Proceeds received directly or indirectly by the Former Stanford Employees from fraudulent CDs are subject to a constructive trust for the benefit of the Receivership Estate;
- (d) An Order establishing the amount of CD Proceeds each of the Former Stanford Employees received;
- (e) An Order providing that each of the Former Stanford Employees is liable to the Receivership Estate for an amount equaling the amount of CD Proceeds he or she received from fraudulent CDs;
- (f) An award of costs, attorney's fees, and prejudgment interest; and
- (g) Such other and further relief as the Court deems proper under the circumstances.

Dated: March 5, 2010

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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ATTORNEYS FOR RECEIVER RALPH S. JANVEY

CERTIFICATE OF SERVICE

On March 5, 2010, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I will serve the Former Stanford Employees individually or through their counsel of record, electronically, or by another means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler
Kevin M. Sadler

Dated: March 5, 2010

Respectfully submitted,

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/s/ Kevin M. Sadler
Kevin M. Sadler

ID¹	Name	Total Proceeds from Former Stanford Employee's CD(s)	Proceeds from Former Stanford Employee's CD(s) Received in Excess of Investments
13	Monica Ardesi	\$ 3,294,765.72	
17	Mauricio Aviles	\$ 35,998.48	
21	Isaac Bar	\$ 50,000.00	
26	Jane E. Bates	\$ 367,733.64	
29	Oswaldo Bencomo	\$ 548,894.32	
32	Andrea Berger	\$ 106,167.85	
36	Michael Bober	\$ 394,254.02	\$ 28,511.02
38	Brad Bradham	\$ 25,000.00	
39	Fabio Bramanti	\$ 564,212.37	
40	Fernando Braojos	\$ 89,847.91	
50	Rafael Carriles	\$ 41,416.06	
54	Jane Chernovetzky	\$ 223,641.91	
57	Neal Clement	\$ 345,515.03	\$ 10,515.03
62	Bernard Cools-Lartigue	\$ 41,198.14	\$ 7,166.06
70	James Cross	\$ 469,313.55	
71	Patrick Cruickshank	\$ 150,000.00	
75	Andres Delgado	\$ 503,289.95	
76	Pedro Delgado	\$ 95,105.37	
78	Arturo R. Diaz	\$ 294,708.05	\$ 44,708.05
79	Ana Dongilio ²	\$ 1,863,888.32	\$ 28,301.09
80	Matthew Drews	\$ 199,882.02	\$ 49,882.02
83	Torben Garde Due	\$ 1,279,921.02	\$ 6,150.03
86	Neil Emery	\$ 884,273.12	
92	Marina Feldman	\$ 28,565.60	
93	Ignacio Felice ²	\$ 1,863,888.32	\$ 28,301.09
95	Freddy Fiorillo	\$ 2,071,774.44	
97	Rosalia Fontanals	\$ 177,335.29	
98	James Fontenot	\$ 513,559.68	
109	Michael D. Gifford	\$ 41,000.00	
110	Eric Gildhorn	\$ 240,279.40	
111	Luis Giusti	\$ 2,188,554.27	
115	Larry Goldsmith	\$ 192,381.46	
116	Ramiro Gomez-Rincon	\$ 28,212.20	
118	Juan Carlos Gonzalez	\$ 86,188.25	
125	Vivian Guarch	\$ 10,719.01	
132	Virgil Harris	\$ 1,091,487.71	\$ 71,361.06
136	Luis Hermosa	\$ 1,370,918.82	
137	Daniel Hernandez	\$ 480,600.51	\$ 50,600.51
138	Martine Hernandez	\$ 468,818.18	
139	Patrica Herr	\$ 159,018.54	
140	Alfredo Herraes	\$ 628,918.45	\$ 1,201.55
144	John Holliday	\$ 58,614.09	
149	Marcos Iturriza	\$ 374,227.65	
154	Faran Kassam	\$ 1,274,740.96	
155	Joseph L. Kligen	\$ 60,435.36	\$ 10,435.36
163	Mayra C. Leon De Carrero	\$ 10,215.87	
164	Robert Lenoir	\$ 34,515.06	

ID¹	Name	Total Proceeds from Former Stanford Employee's CD(s)	Proceeds from Former Stanford Employee's CD(s) Received in Excess of Investments
165	Humberto Lepage	\$ 3,133,671.45	\$ 46,746.09
170	Trevor Ling	\$ 1,583,893.44	
173	Humberto Lopez	\$ 575,600.81	
174	Luis Felipe Lozano	\$ 72,011.26	\$ 10,214.89
176	Michael MacDonald	\$ 86,601.43	\$ 6,601.43
180	Maria Manerba	\$ 85,145.39	
182	Iris Marcovich	\$ 209,923.91	\$ 87,990.23
185	Aymeric Martinoia	\$ 105,238.33	
193	Lawrence Messina	\$ 70,691.61	
197	Trenton Miller	\$ 219,982.03	
198	Hank Mills	\$ 354,431.68	
200	Peter Montalbano	\$ 542,117.58	\$ 42,117.58
201	Alberto Montero	\$ 366,079.00	
203	David Morgan	\$ 226,291.99	
209	Jon Nee	\$ 148,025.72	
213	Norbert Nieuw	\$ 89,212.30	
220	Alfonso Ortega	\$ 1,361,926.63	
225	Ernesto Pena	\$ 677,881.00	
227	Roberto A. Pena	\$ 100,000.00	
229	Saraminta Perez	\$ 9,904.96	
234	Randall Pickett	\$ 266,097.36	\$ 16,097.36
235	Eduardo Picon	\$ 124,938.41	
236	Edward Prieto	\$ 11,300.00	
240	Maria Putz	\$ 10,000.00	
244	Leonor Ramirez	\$ 151,067.74	
245	Nelson Ramirez	\$ 14,545.43	\$ 4,545.43
252	Giampiero Riccio	\$ 50,000.00	
254	Juan C. Riera	\$ 61,012.73	
263	Julio Ruelas	\$ 21,181.81	
265	Tatiana Saldivia	\$ 105,072.37	
266	John Santi	\$ 799,037.85	\$ 28,797.34
268	Louis Schaufele	\$ 386,826.18	
281	Edward Simmons	\$ 3,357.26	
282	Peter Siragna	\$ 2,394,622.67	\$ 116,050.56
284	Nancy Soto	\$ 1,130,488.20	
286	Sanford Steinberg	\$ 171,534.05	\$ 21,534.05
288	William O. Stone Jr.	\$ 100,000.00	
294	Ana Tanur	\$ 406,936.31	
298	Mark Tidwell	\$ 527,048.26	\$ 61,507.19
299	Yliana Torrealba	\$ 26,238.11	
303	Roberto Ulloa	\$ 267,552.52	
305	Miguel Valdez	\$ 464,687.78	
306	Nicolas Valera	\$ 313,863.62	
310	Ettore Ventrice	\$ 440,953.53	\$ 31,569.53
311	Mario Vieira	\$ 23,615.15	
312	Evely Villalon	\$ 1,187,053.63	
313	Maria Villanueva	\$ 1,826,422.86	\$ 248,718.58
315	Frans Vingerhoedt	\$ 1,685,058.95	

ID¹	Name	Total Proceeds from Former Stanford Employee's CD(s)	Proceeds from Former Stanford Employee's CD(s) Received in Excess of Investments
316	Daniel Vitrian	\$ 606,180.98	
321	David Whittemore	\$ 285,783.43	\$ 35,783.43
327	Ihab Yassine	\$ 643,267.59	
329	Leon Zaidner	\$ 2,003,561.64	

Notes:

1. "ID" corresponds to the ID number listed in Appendix in Support of the Receiver's Second Amended Complaint Against Former Stanford Employees (Doc. 157).
2. Ana Dongilio's and Ignacio Felice's names are listed on the same SIBL account. As a result, their "Total Proceeds from Former Stanford Employee's CD(s)" and "Proceeds from Former Stanford Employee's CD(s) Received in Excess of Investments" amounts are included twice: once for Dongilio, and once for Felice.