

JAMES D. SALLAH, ESQ.
Court-Appointed Receiver for
JCS Enterprises Inc., d/b/a JCS Enterprises Services Inc., T.B.T.I. Inc., My Gee Bo,
Inc., JOLA Enterprises, Inc. and PSCS Holdings, LLC

3010 NORTH MILITARY TRAIL, SUITE 210
BOCA RATON, FLORIDA 33431
TEL: (561) 989-9080; FAX: (561) 989-9020

March 17, 2020

Re: *Claims Process for JCS Enterprises Inc., d/b/a JCS Enterprises Services Inc., T.B.T.I. Inc., My Gee Bo, Inc., JOLA Enterprises, Inc. and PSCS Holdings, LLC*

Dear Claimant:

The purpose of this letter is to update you on the status of the claims process. I am glad to report that I recently settled with claimant First Data Merchant Services, LLC (“First Data”) at mediation on Sunday, March 8, 2020.¹ As you may recall, First Data was the largest claimant in the Receivership Estate, was claim no. 631, and submitted an original claim for more than \$7.3 million that First Data later reduced to \$7,190,693.

The Settlement Agreement is subject to approval by the Court, so I have recently filed a Motion to Approve. The Motion to Approve can be viewed in the “Court Documents” section of the receivership website www.jcs-tbtireceivership.com. The relevant settlement terms include, among other things, the following:

- a) Within ten (10) business days of a Court’s Order granting the Motion to Approve the Settlement Agreement, I shall pay First Data \$2,750,000.00 in full satisfaction of its claim amount;
- b) I shall provide notice to claimants of the proposed settlement on my website and also in a letter to claimants, which is this very letter;
- c) I shall file a notice of filing with the Court any responses to the proposed settlement that I receive from you or any other claimants, but I shall re-affirm in the notice of filing to the Court my full support for the proposed settlement;

¹ In layman’s terms, mediation is a formal settlement meeting or conference in which the relevant parties attempt to settle the legal dispute between them with the assistance of a neutral third-party attorney or retired judge called a mediator. First Data and I agreed to select respected South Florida attorney Harry Schafer as mediator. Mr. Schafer has significant experience mediating complex litigation matters throughout Florida, including receivership matters such as this matter involving First Data.

- d) First Data and I shall release each other in standard mutual releases; and
- e) First Data's forensic expert Patrick Gannon shall cooperate with me and my professionals, and First Data shall compensate Mr. Gannon for such cooperation, regarding additional potential receivership recoveries as described in the Settlement Agreement.

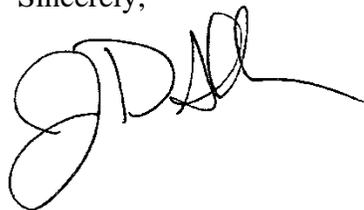
If you have an opinion on the settlement, you can email me at claimsinfo@jcs-tbtireceivership.com by Monday, March 30, 2020. Under the settlement, I will file with the Court your emails. Only emails that I receive at claimsinfo@jcs-tbtireceivership.com by March 30, 2020, will be filed. Emails to any other email address and/or after March 30th will not be filed.

I believe that the Settlement Agreement provides a practical solution and sound business judgment that will result in substantial benefit to the Receivership Estate. Further, I believe that the proposed settlement, as reflected by the Settlement Agreement, is in the best interests of the Receivership Estate and aggrieved investors because the proposed resolutions avoid the protracted time involved in litigation with First Data, avoid further receivership fees and costs incurred with continued litigation, eliminate First Data's priority claim of \$7.2 million (approximately 70% of the funds in the Receivership Estate), pay First Data a reduced claim with a settlement payment of \$2,750,000, eliminate a potential lengthy appeal by First Data of a potential adverse ruling against First Data by the Court, and upon Court-approval of the settlement, will allow me to finally file a Motion for First Distribution for the benefit of the hundreds of defrauded investors who submitted approved claims and who have been waiting patiently for several years for a first distribution.

I anticipate filing the Motion for First Distribution within thirty (30) days of the Order granting the Motion to Approve, but will obviously need the Motion to Approve granted, and the Settlement Agreement approved, in order to do so. As I have previously stated, I have not been able to make a first distribution/payment to approved claimants, until (1) I finish litigating the First Data claim, (2) the Court rules on same (or there is an approved settlement), and (3) the Court rules on my future separate Motion for First Distribution.

Please continue to remain patient during this process. If you have any questions, please email me at claimsinfo@jcs-tbtireceivership.com or feel free to call my office at (561) 989-9080.

Sincerely,

A handwritten signature in black ink, appearing to read 'JD Sallah', with a long horizontal flourish extending to the right.

James D. Sallah, Esq.
Not Individually, But Solely in His Capacity as Receiver for
the Receivership Entities