

**Preface for Exhibit B – People v. Protege Financial Amended Settlement Agreement:**

**Exhibit B** contains a total of four components corresponding to funds sent or received by the following entities: (1) Not Forgotten, LLC; (2) Windsor Pictures, LLC; (3) Protege Financial & Insurance Service, Inc.; and (4) Saxe-Coburg Insurance Solutions, LLC. Each component shows the net restitution owed to each judgment creditor related to that particular entity (listed under the “TOTAL” column). Each amount listed in the TOTAL column is then assigned to either: (1) the Seward Defendants; (2) Dror Soref; or (3) Scott Foulk (collectively, the “Defendants”). To determine the “several” liability owed by each defendant to each judgment creditor, take the amount listed in each column where a defendant’s name appears at the top of the column and reduce that number by 1/3. In other words, each defendant has accepted “several” liability for 2/3 of the amount listed in the column under their respective names.

The summary chart at the beginning of **Exhibit B** shows the net restitution owed by entity and the total amounts assigned to each defendant. The subtotals highlighted in yellow are the total amounts of restitution assigned to each defendant. The orange subtotals directly below the yellow totals are the several liability of 2/3 that each defendant has accepted. The total of several liability accepted by all Defendants is 2/3 of the total restitution owed.

As set forth in the Amended Settlement Agreement, the Defendants have accepted joint and several liability for the first \$5,813,742.54 of the net restitution owed (\$17,441,227.63). Therefore, the first \$5,813,742.54 collected from any source will be paid to all judgment creditors listed in **Exhibit B** in a pro rata fashion by family unit (husband and wife or family trust consolidated). After the initial joint and several restitution amount is paid, all monies paid by each defendant will be distributed in a pro rata fashion by family unit (husband and wife or family trust consolidated) only to their assigned judgment creditors until each individual defendant’s several liability is satisfied.