IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

In re	:	
	:	
PANTHERA ENTERPRISES, LLC,	:	**BK No. 2:19-BK-00787**
	:	
Debtor.	:	**Chapter 11**
	:	
PANTHERA TRAINING, LLC, and WEST VIRGINIA ECONOMIC DEVELOPMENT AUTHORITY,	:	
	:	
Movants,	:	
	:	
v.	:	
	:	
PANTHERA ENTERPRISES, LLC,	:	
	:	
Respondent.	:	

PANTHERA TRAINING, LLC'S SUPPLEMENTAL EVIDENCE IN SUPPORT OF JOINT MOTION TO CONVERT THIS CASE TO A CHAPTER 7 PROCEEDING FOR CAUSE PURSUANT TO 11 U.S.C. § 1112(b)(1)

Panthera Training, LLC ("Panthera Training"), by counsel, submits the following supplemental evidence in support of the *Joint Motion to Convert this Case to a Chapter 7 Proceeding for Cause Pursuant to 11 U.S.C. § 1112(b)(1)* ("Joint Motion") filed by Panthera Training and the West Virginia Economic Development Authority:

1. The Joint Motion seeks to have this bankruptcy case converted to a Chapter 7 proceeding with the appointment of a Chapter 7 Trustee for cause pursuant to § 1112(b)(1) of the Bankruptcy Code. The Movants assert cause exists based upon (a) gross mismanagement of the bankruptcy estate; (b) failure to maintain appropriate insurance; and (c) continuing loss and diminution of the estate and the absence of a reasonable likelihood of rehabilitation. 11 U.S.C. § 1112(b(4)(A) - (C).

2. Gross mismanagement of the bankruptcy estate is largely based upon the Debtor's failure to prepare and file complete and accurate operating reports ("the Operating Reports"). In their Joint Motion, the Movants reviewed relevant entries from the Operating Reports filed from September 2019 through March 2020[1] in order to highlight how the Debtor; (i) transferred the Debtor's funds to its non-debtor subsidiary, Panthera Training Center, LLC ("Center"), claiming it was done in error, but not fully returning the funds to the Debtor until four (4) months later; and (ii) used the Debtor's funds to pay Center's payable owed to Panthera Training instead of paying those payables with Center's funds, and then falsely reported the payments as being made on one of Debtor's contract's payables. Doc 132, pp. 4-10.

3. In its Objection to the Joint Motion, the Debtor took umbrage with the allegations that it "filed false operating reports, implying some intent by the Debtor to mislead or otherwise mischaracterize the payments at issue." Doc 147, p. 5. The Debtor submitted "the few alleged inaccuracies on the Monthly Operating Reports were inadvertent . . . " and passed the "errors" off as "understandable human frailty." *Id.*

4. However, Center's recently received bank account records reveal the truth.

5. At the end of last week, Panthera Training received records for Center's bank account with Atlantic Union Bank in response to a document subpoena. The subpoena was served in a breach of contract lawsuit pending in the Circuit Court of Loudoun County, Virginia, styled *Panthera Training, LLC v. Panthera Training Center, LLC*, CL200002269-00, in which Panthera Training is seeking judgment of $91,894.60 owed to it by Center. See Center's bank records ("Bank Records") attached to the Affidavit of Douglas E. Kahle, Esq., attached to this Supplement as Exhibit A.

[1] The Debtor is delinquent, and has not yet filed its April, 2020 Operating Report.

6. As the transactions between the Debtor and Center are reviewed below, it should be kept in mind that the Bank Records disclose that Debtor's responsible party, James Punelli ("Punelli"), is also the sole authorized signatory on Center's bank account. Ex. A, p. PT 21.

7. In its September Operating Report, the Debtor reported a receivable of $177,883.00 was expected in October, 2019 from the DEA in payment of a training class. Doc 37, p. 10. This is a training class that Panthera Training conducted for the DEA under Panthera Training's Subcontract with the Debtor. See Doc 132, ¶¶ 5-6. Also in its September Operating Report, in order to establish a foundation for the subsequent transfer of funds to Center, the Debtor created a fictitious payable owed to Center. Doc 37, p. 9.

8. In order to receive the funds that were about to be transferred from the Debtor to Center, on October 4, 2019 Mr. Punelli opened a new bank account for Center with Atlantic Union Bank, with a deposit of $1,000.00. Ex. A, p. PT 6.

9. On October 21, 2019, the Debtor received the $172,000 that was expected from the DEA. Doc 63, p. 16. On the very same day the Debtor wired $134,160.00 to Center's new bank account. Doc 63, p. 8; Ex.A , p. PT 6.

10. In the same report that reflected the transfer of funds, the Debtor characterized the transfer of the $134,160 to Center as an "error," but instead of immediately returning the money, the Debtor stated that the money would be "refunded and shown on the November operating report." Doc 63, p. 8. The Debtor's November Operating Report, however, later represented that there had been a "miscommunication" such that the $134,160 was not refunded during November. Doc 80, p. 6.

11. As addressed previously, payments by the DEA for the training conducted by Panthera Training were supposed to have been forwarded immediately to Panthera Training. See Doc 52-7, p. 26. But the $172,000 was not paid to Panthera Training. Instead, the Debtor moved $134,160.00 to Center's non-debtor bank account where the use of the Debtor's funds would be outside the purview of this Bankruptcy Court and the Debtor's creditors.

12. Center's Bank Records show on the same day that the $134,160.00 was transferred to Center's bank account, $8,100 was transferred from Center's bank account to Panthera Worldwide, LLC, a "non-operational" subsidiary of the Debtor, also managed by Punelli along with Raymond Jones. Doc 52-5 (341 Transcript, pp. 15:1-6; 27:15-17; 29:4-6; and 75: 13-17.). This transfer was followed by a series of distributions, beginning later in October, being made to Punelli, his family partnership, and to Raymond Jones, the Debtor's other principal. Ex. A, pp PT 7-18, 20.

13. In the weeks and months that followed the Debtor's transfer of $134,160 to Center, continuing through March, 2020, altogether over $102,000 was siphoned off to the principals of the Debtor; Punelli and Raymond Jones, and to Punelli's family partnership. Ex. A, pp PT 7-18. It is highly likely, although not expressly stated on the face of the Bank Records, that most of the other disbursements from Center's bank account with unidentified beneficiaries, such as the purchase of a $2,861.53 airline ticket with Iceland Air, were also for Punelli's personal benefit. Ex. A, p PT 15. [2]

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[2] Given the multiple distributions from Center's account to the Debtor's principals addressed above, one may wonder how Center eventually returned the $134,160 to the Debtor. Doc 93, p. 7; Doc 110, p. 7. The Bank Records answer this question as they show the receipt of payments of the invoices owed for the SOCOM and 1st CIG training conducted by Panthera Training, but not paid by Center, as addressed in the Joint Motion. Ex. A, pp PT 12, 15, 16 and 17.

14. The timing of the Debtor's receipt of the DEA payment, the immediate transfer of $134,160 from that DEA payment to Center's new bank account, and the subsequent pattern of distributions of these funds to Mr. Punelli, his family partnership, and Raymond Jones, compel the irrefutable conclusion that the $134,160 transfer to Center on October 21, 2019 was anything but an "error" on the part of the Debtor's responsible party. And, as pointed out in the Joint Motion, since Mr. Punelli is the responsible person for both the Debtor and Center (Doc 132, n. 2.) it is truly incredible that the Debtor represented that the funds were not returned to the Debtor in November, 2019 because Punelli "miscommunicated" with himself. Center's Bank Records reveal that there was no simple "error", there was no "miscommunication", and there were no "inadvertent" mischaracterizations related to the Debtor's false entries related to its financial transactions involving Center. Rather, Center's Bank Records reveal the existence of a fraudulent scheme that was devised and employed to free up cash for the Debtor's principals', and Punelli's family's, personal use, outside of the purview of the Bankruptcy Court and the Debtor's creditors.

15. The Debtor's actions and more specifically, the actions of its responsible party, represent a bold and stunning breach of the fiduciary duty owed to the Debtor's creditors. This case cries out for the appointment of a Trustee and conversion to a Chapter 7.

WHEREFORE, Panthera Training, LLC requests that the Court convert this case to one under Chapter 7 with the appointment of a Chapter 7 Trustee, and grant such further relief as this cause merits.

PANTHERA TRAINING, LLC

By Counsel

/s/ Douglas E. Kahle, Esq.

Douglas E. Kahle (VA BAR No. 15964)
BASNIGHT, KINSER, LEFTWICH & NUCKOLLS, P.C.
308 Cedar Lakes Drive, 2nd Floor
Chesapeake, Virginia 23322
Telephone: (757) 547-9191
Facsimile: (757) 547-9135
E-mail: DKahle@basnightkinser.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
(Martinsburg)

In re	:	
	:	**BK No. 2:19-bk-00787**
PANTHERA ENTERPRISES, LLC,	:	
	:	**Chapter 11**
Debtor.	:	
	:	
	:	
WEST VIRGINIA ECONOMIC DEVELOPMENT AUTHORITY,	:	
	:	
	:	
Movant,	:	
	:	
v.	:	
	:	
PANTHERA ENTERPRISES, LLC,	:	
	:	
Respondent.	:	
	:	

CERTIFICATE OF SERVICE

I, Douglas E. Kahle, Esq., hereby certify that on this 8th day of June 2020, the foregoing *Panthera Training, LLC's Supplemental Evidence in Support of Joint Motion to Convert This Case to a Chapter 7 Proceeding for Cause Pursuant to 11 U.S.C. § 1112(b)(1)* was served through the Court's ECF system on all parties registered to receive CM/ECF notices, including:

Mark A. Lindsay
John J. Richardson
Robert S. Bernstein
Bernstein-Burkley, P.C.
707 Grant Street, Ste. 2200
Pittsburgh, PA 15219
Counsel for the Debtor

Gary O. Kinder
U.S. Trustee's Office
300 Virginia Street East, Rm. 2025
Charleston, WV 25301
U.S. Trustee

Debra Lee Allen
Spilman Thomas & Battle, PLLC
c/o 292 Pleasant Valley Drive
Charles Town, WV 25414
Counsel for the West Virginia Economic Development Authority

/s/ Douglas E. Kahle, Esq.

Douglas E. Kahle (VA BAR No. 15964)
BASNIGHT, KINSER, LEFTWICH & NUCKOLLS, P.C.
308 Cedar Lakes Drive, 2nd Floor
Chesapeake, Virginia 23322
Telephone: (757) 547-9191
Facsimile: (757) 547-9135
E-mail: DKahle@basnightkinser.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

In re:

PANTHERA ENTERPRISES, LLC

Debtor.

Case No. 2:19-BK-787
Chapter 11

AFFIDAVIT OF DOUGLAS E. KAHLE, ESQ.

COMMONWEALTH OF VIRGINIA)
CITY OF CHESAPEAKE)

This day personally appeared before me, a Notary Public in and for the jurisdiction aforesaid, Douglas E. Kahle, Esq., who, being duly sworn, states as follows;

1. Acting as legal counsel for Panthera Training, LLC ("Training"), I filed a breach of contract lawsuit against Panthera Training Center, LLC ("PTC") in the Loudon County Circuit Court in the Commonwealth of Virginia, styled as Panthera Training, LLC, v. Panthera Training Center, LLC, CL20-2269. ("the Litigation").

2. In connection with discovery conducted in the Litigation, I served a document subpoena ("the Subpoena") on PTC's bank, Atlantic Union Bank.

3. Attached hereto are true and accurate copies of documents received from Atlantic Union Bank pursuant to the Subpoena.

Further the Affiant saith not.

Douglas E. Kahle, Esq.

Taken, subscribed and sworn to before me this 8th day of June, 2020.

My commission expires: 9/30/22

Registration number: 197271

NOTARY PUBLIC

[NOTORIAL SEAL]

BECKY G. BRINN
NOTARY PUBLIC
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES SEPTEMBER 30, 2022

EXHIBIT
A

11413749.1

SUBPOENA DUCES TECUM (CIVIL) — ATTORNEY ISSUED VA. CODE §§ 8.01-413, 16.1-89, 16.1-265; Commonwealth of Virginia Supreme Court Rules 1:4, 4:9

Case No.: CL20002269-00

HEARING DATE AND TIME

LOUDOUN COUNTY CIRCUIT Court

18 E. MARKET STREET, 3RD FLOOR, LEESBURG, VA 20178

COURT ADDRESS

PANTHERA TRAINING, LLC v./In re: PANTHERA TRAINING CENTER, LLC

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

CUSTODIAN OF RECORDS FOR ATLANTIC UNION BANK

NAME

102 CATOCTIN CIRCLE SE

STREET ADDRESS

LEESBURG VA 20175

CITY STATE ZIP

TO the person summoned: You are commanded to make available the documents and tangible things designated and described below:

SEE EXHIBIT "A" ATTACHED HERETO.

at 308 CEDAR LAKES DRIVE, 2ND FL., CHESAPEAKE, VA 23322 at 15 DAYS AFTER SERVICE / 5:00 P.M.

LOCATION DATE AND TIME

to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of

PANTHERA TRAINING, LLC

PARTY NAME

DOUGLAS E. KAHLE, ESQ.

NAME OF ATTORNEY

15964

VIRGINIA STATE BAR NUMBER

308 CEDAR LAKES DRIVE, 2ND FLOOR

OFFICE ADDRESS

757-547-911

TELEPHONE NUMBER OF ATTORNEY

CHESAPEAKE, VA 23322

OFFICE ADDRESS

757-547-1935

FACSIMILE NUMBER OF ATTORNEY

April 29, 2020

DATE ISSUED

SIGNATURE OF ATTORNEY

Notice to Recipient: See page two for further information.

RETURN OF SERVICE (see page two of this form)

FORM DC-498 (MASTER, PAGE ONE OF TWO) 7/01

ATLANTIC UNION BANK
RCVD BY DCS 05.26.20
WIV

BATES-PT- 001

TO the person summoned:
If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

☒ **This SUBPOENA DUCES TECUM is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.**

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

NAME: CUSTODIAN OF RECORDS FOR ATLANTIC UNION BANK

ADDRESS: 102 CATOCTIN CIRCLE SE

LEESBURG, VA 20175

☐ PERSONAL SERVICE | Tel. No. 540-227-3133

Being unable to make personal service, a copy was delivered in the following manner:

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:

☐ Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ NOT FOUND

_____, Sheriff

_____ by _____, Deputy Sheriff
DATE

CERTIFICATE OF COUNSEL

I, DOUGLAS E. KAHLE, counsel for PANTHERA TRAINING, LLC, hereby certify that a copy of the foregoing subpoena duces tecum was MAILED (DELIVERY METHOD) to SECRETARY OF THE COMMONWEALTH, ~~counsel of record for~~ VIA CERTIFIED MAIL, on the 29TH day of APRIL, 2020.

SIGNATURE OF ATTORNEY

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

FORM DC-498 (MASTER, PAGE TWO OF TWO) 07/01

Exhibit A

1. Copies of all bank statements for all accounts of Panthera Training Center, LLC , (collectively "the Account") for the period beginning September 1, 2019 through current date.

2. Copies of the Account's incoming and outgoing checks, wire memos, and electronic fund transfers for the period beginning September 1, 2019 through current date.

3. Copies of documents that established the Account.

4. Copies of documents reflecting the authorized signatories on the Account for the period beginning September 1, 2019 through current date.

Atlantic Union Bank

June 3, 2020

DOUGLAS E KAHLE
308 CEDAR LAKES DRIVE, 2ND FLOOR
CHESAPEAKE, VA 23322

Re: PANTHERA TRAINING

Dear Douglas Kahle, Esquire

In response to the legal document requesting client records, issued **for the past 7 months** in the above mentioned matters, I have enclosed the requested documents. These documents consist of **statements, checks, deposits, wires, resolution and signature cards.** The time frame for these records is **September 01, 2019 – May 31, 2020.**

Our Bill for services rendered in complying with this **Subpoena for Records** is enclosed. Please forward your check in the amount of $50.00 within thirty (30) days of receipt of this letter, payable to Atlantic Union Bank, to the attention of **William Vaughan, Centralized Fulfillment Services.**

If you have any questions or concerns relative to our response, please contact me at the numbers listed below.

Sincerely,

William Vaughan
Centralized Fulfillment Services
Atlantic Union Bank
PO Box 940
Ruther Glen, VA 22546
P 804-448-0751 Team Line 804-589-3065 Fax 804-633-5275
william.vaughan@atlanticunionbank.com
centralized.fulfillme@atlanticunionbank.com

DECLARATION OF ATLANTIC UNION BANK CERTIFYING RECORDS OF REGULARLY CONDUCTED BUSINESS ACTIVITY

I, the undersigned, William Vaughan, declare:

1. I am employed by Atlantic Union Bank as a Centralized Fulfillment Representative, and by reason of my position am authorized and qualified to make this declaration.
2. I further certify that the enclosed documents including statements, checks, deposits, and signature card are true copies of records that were:
    a. Made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
    b. Kept in the course of regularly conducted business activity; and
    c. Made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 03, 2020.

William Vaughan

PANTHERA TRAINING

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Page 1 of 3
Account Number: [redacted]544
Date 10/31/19
Images: 1

STATEMENT SUMMARY AS OF 10/31/19

Account Name	Account Number	Balance
SMALL BUSINESS CHECKING	[redacted]544	126,356.96

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC Acct[redacted]544

Beginning Balance	10/04/19	.00	
Deposits / Misc Credits	3	141,432.37	
Withdrawals / Misc Debits	13	15,075.41	
** Ending Balance	10/31/19	126,356.96	**
Service Charge		.00	
Average Balance		51,439	
Average Collected Balance		51,439	
Minimum Balance		783	
Enclosures		1	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
10/04	DEPOSIT	1,000.00		1,000.00
10/18	POS PURCHASE Non-PIN LYON COLLECTION SRVCS 800-9355966 NV IN7200 *****5063 10/17 03:33		140.83	859.17
10/18	POS PURCHASE Non-PIN LYON COLLECTION SRVCS 800-9355966 NV IN9000 *****5063 10/17 03:33		75.24	783.93
10/21	Ref 2940951 from Dep 1080067414	6,272.37		7,056.30
10/21	WIRE/IN ORG:PANTHERA ENTERPRISES LLC	134,160.00		141,216.30
10/21	INCOMING WIRE FEE		15.00	141,201.30
10/21	Ref 2941009 to Dep 1080067414 For PTC payments via wire		8,100.00	133,101.30
10/22	POS PURCHASE Non-PIN WV TREASURY BASIC 866-2439010 WV 764095 *****5063 10/21 14:36		76.00	133,025.30
10/23	POS PURCHASE Non-PIN FS *Readdle 877-3278914 CA 296960 *****5063 10/22 21:55		79.99	132,945.31
10/23	DE eCorp Tax/E-CHECK Panthera Training Cent		1,165.00	131,780.31
10/23	DE eCorp Tax/E-CHECK Panthera Training Cent		1,165.00	130,615.31
10/23	DE eCorp Tax/E-CHECK Panthera Training LLC		1,165.00	129,450.31
10/23	WVTREASURY/SOS James Punelli		76.00	129,374.31

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC

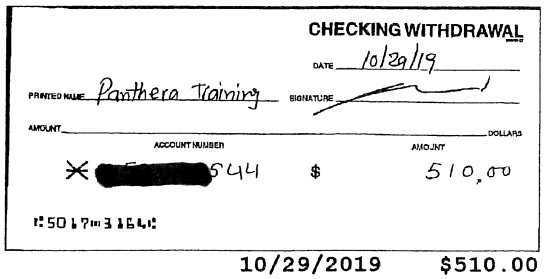
Account Number: [redacted]544
Date: 10-31-19
Images: 1

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
10/29	POS PURCHASE with PIN		7.35	129,366.96
	USPS KIOSK 51510 LEESBURG VA 009550			
	*****5063 10/29 15:09			
10/29	MISCELLANEOUS DEBIT		510.00	128,856.96
10/30	WIRE/OUT BNF:JONES RAYMOND		2,500.00	126,356.96

Atlantic Union Bank

Account Number [redacted]544 **PAGE** 3 of 3



CHECKING WITHDRAWAL

DATE 10/29/19

PRINTED NAME Panthera Training SIGNATURE

AMOUNT _____ DOLLARS

ACCOUNT NUMBER AMOUNT

[redacted]544 $ 510,00

⑆501731641⑆

10/29/2019 $510.00

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Account Number: [redacted]544
Date 11/30/19
Images: 1

Ready to drive your business? Ask your banker about payment processing with TSYS. Customized pricings, 24/7 live customer support, fraud prevention, data security tools, and next day funding available.

STATEMENT SUMMARY AS OF 11/30/19

Account Name	Account Number	Balance
SMALL BUSINESS CHECKING	[redacted]544	105,539.17

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC Acct [redacted]544

Beginning Balance	11/01/19	126,356.96	
Deposits / Misc Credits	0	.00	
Withdrawals / Misc Debits	22	20,817.79	
** Ending Balance	11/30/19	105,539.17	**
Service Charge		.00	
Average Balance		108,424	
Average Collected Balance		108,424	
Minimum Balance		105,539	
Enclosures		1	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
11/01	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		12,500.00	113,856.96
11/04	POS PURCHASE Non-PIN AGENTS AND CORPORATIONS 302-5750877 DE 710041 *****5063 11/03 09:40		198.00	113,658.96
11/05	POS PURCHASE Non-PIN VBS*VONAGE BUSINESS 866-901-0242 GA IN0800 *****5063 11/04 22:12		196.88	113,462.08
11/05	ATLANTIC UNION/BEB FEES PANTHERA ENTERPR		30.00	113,432.08
11/06	POS PURCHASE Non-PIN PALMETTO TECHNOLOGY GR 864-552-1291 SC 058583 *****5063 11/05 03:48		109.60	113,322.48
11/07	CHECK #2470		1,100.00	112,222.48
11/08	WIRE/OUT BNF:JAMES PUNELLI		800.00	111,422.48
11/08	WIRE/OUT BNF:JAMES PUNELLI		589.33	110,833.15
11/08	NC DEPT REVENUE/TAX PYMT 1400310000032469678502		2,114.31	108,718.84
11/12	VA DEPT TAXATION/TAX PAYMEN Panthera Solutions, LL		10.51	108,708.33
11/12	VA DEPT TAXATION/TAX PAYMEN Panthera Solutions, LL		10.51	108,697.82
11/12	VA DEPT TAXATION/TAX PAYMEN		10.51	108,687.31

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC

Account Number: [redacted]544
Date: 11-30-19
Images: 1

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.51	108,676.80
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.37	108,666.43
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.37	108,656.06
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.37	108,645.69
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.37	108,635.32
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.37	108,624.95
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		10.36	108,614.59
	Panthera Solutions, LL			
11/12	VA DEPT TAXATION/TAX PAYMEN		5.92	108,608.67
	Panthera Solutions, LL			
11/18	POS PURCHASE Non-PIN		2,950.00	105,658.67
	USFCR 877-252-2700 HTTPSUSCONTRA FL			
	INB700 *****5063 11/15 22:45			
11/18	POS PURCHASE Non-PIN		119.50	105,539.17
	HARLANDCLARKECHECKPRNT 877-534-3769 TX			
	INC900 *****5063 11/17 22:29			

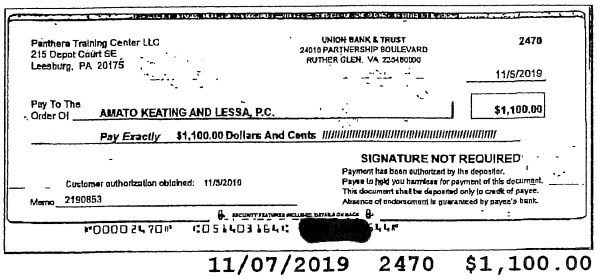
Checks

Date	Check No	Amount	Date	Check No	Amount	Date	Check No	Amount
11/07	2470	1,100.00						

* indicates a break in check number sequence

Atlantic Union Bank

Account Number [redacted]544 **PAGE** 3 of 3



Panthera Training Center LLC
215 Depot Court SE
Leesburg, PA 20175

UNION BANK & TRUST
24019 PARTNERSHIP BOULEVARD
RUTHER GLEN, VA 22546-0000

2470

11/5/2019

Pay To The Order Of AMATO KEATING AND LESSA, P.C. $1,100.00

Pay Exactly $1,100.00 Dollars And Cents

SIGNATURE NOT REQUIRED
Payment has been authorized by the depositor.
Payee to hold you harmless for payment of this document.
This document shall be deposited only to credit of payee.
Absence of endorsement is guaranteed by payee's bank.

Customer authorization obtained: 11/5/2019

Memo 2190853

⑈0000 2470⑈ ⑆051403164⑆ [redacted]544⑈

11/07/2019 2470 $1,100.00

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Page 1 of 2

Account Number: [redacted]544
Date 12/31/19
Images: 0

Give the gift of better cash flow this holiday season. Make your business hum with merchant processing services. Ask your banker or visit a branch in person to learn how we can keep your customers with faster and safer payment solutions.

STATEMENT SUMMARY AS OF 12/31/19

Account Name	Account Number	Balance
SMALL BUSINESS CHECKING	[redacted]44	15,902.07

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC Acct [redacted]544

Beginning Balance	12/01/19	105,539.17	
Deposits / Misc Credits	1	30,200.00	
Withdrawals / Misc Debits	15	119,837.10	
** Ending Balance	12/31/19	15,902.07	**
Service Charge		.00	
Average Balance		45,283	
Average Collected Balance		45,283	
Minimum Balance		15,902	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
12/02	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		6,000.00	99,539.17
12/02	WIRE/OUT BNF:JAMES PUNELLI		800.00	98,739.17
12/04	ATLANTIC UNION/BEB FEES		30.00	98,709.17
	PANTHERA ENTERPR			
12/05	POS PURCHASE Non-PIN		196.88	98,512.29
	VBS*VONAGE BUSINESS 866-901-0242 GA			
	INB600 *****5063 12/04 21:36			
12/05	GO DADDY/WEB ORDER		59.96	98,452.33
	Punelli			
12/06	WIRE/OUT BNF:PANTHERA ENTERPRISES LLC		50,000.00	48,452.33
12/16	DCD/Misc Pay	30,200.00		78,652.33
	PANTHERA TRAININ			
12/16	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		3,000.00	75,652.33
12/16	WIRE/OUT BNF:JAMES PUNELLI		589.33	75,063.00
12/16	GO DADDY/WEB ORDER		36.34	75,026.66
	Punelli			
12/18	WIRE/OUT BNF:PANTHERA ENTERPRISES LLC		50,000.00	25,026.66
12/23	WIRE/OUT BNF:LINCOLN AND MORGAN		5,000.00	20,026.66
12/23	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		2,000.00	18,026.66
12/23	WIRE/OUT BNF:JONES RAYMOND		2,000.00	16,026.66
12/23	GO DADDY/WEB ORDER		14.99	16,011.67
	Punelli			

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC

Account Number: [redacted]544
Date: 12-31-19
Images: 0

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
12/30	POS PURCHASE Non-PIN PALMETTO TECHNOLOGY GR 864-436-7189 SC 058583 *****5063 12/27 03:48		109.60	15,902.07

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Account Number: [redacted]544
Date 01/31/20
Images: 0

Get your business off on the right foot this year when you open an Atlantic Union Bank Money Market account. Flexible solutions allow you to grow your money while your business can still access it. Talk to your banker or visit AtlanticUnionBank.com to start the new year saving smartly.

STATEMENT SUMMARY AS OF 01/31/20

Account Name	Account Number	Interest Paid In 2019	Balance
SMALL BUSINESS CHECKING	[redacted]544	.00	16,181.10

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC Acct [redacted]544

Beginning Balance	1/01/20	15,902.07	
Deposits / Misc Credits	1	22,232.40	
Withdrawals / Misc Debits	24	21,953.37	
** Ending Balance	1/31/20	16,181.10	**
Service Charge		.00	
Average Balance		7,479	
Average Collected Balance		7,479	
Minimum Balance		3,940	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
1/02	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		8,000.00	7,902.07
1/02	WIRE/OUT BNF:JAMES PUNELLI		800.00	7,102.07
1/06	POS PURCHASE Non-PIN		188.19	6,913.88
	VBS*VONAGE BUSINESS 866-901-0242 GA			
	INC300 *****5063 01/04 21:30			
1/06	ATLANTIC UNION/BEB FEES		30.00	6,883.88
	PANTHERA ENTERPR			
1/07	POS PURCHASE Non-PIN		278.35	6,605.53
	PALMETTO TECHNOLOGY GR 864-436-7189 SC			
	058583 *****5063 01/06 04:54			
1/13	POS PURCHASE Non-PIN		40.58	6,564.95
	PNS*SOUTHWEST RECOVERY 214-3878068 TX			
	INB700 *****5063 01/10 04:04			
1/14	OUTGOING WIRE FEE		10.00	6,554.95
1/14	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		2,000.00	4,554.95
1/15	OUTGOING WIRE FEE		10.00	4,544.95
1/15	WIRE/OUT BNF:JAMES PUNELLI		589.33	3,955.62
1/16	POS PURCHASE Non-PIN		14.95	3,940.67
	VBS*VONAGE BUSINESS 866-901-0242 GA			
	INP900 *****5063 01/15 21:31			

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC

Account Number: [redacted]44
Date: 01-31-20
Images: 0

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
1/16	POS PURCHASE Non-PIN VBS*VONAGE BUSINESS 866-901-0242 GA INB800 *****5063 01/15 21:31		.01	3,940.66
1/28	Ref 0280720 from Dep 1080067414 Misappli ed SOCOM payment	22,232.40		26,173.06
1/28	OUTGOING WIRE FEE		10.00	26,163.06
1/28	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		4,000.00	22,163.06
1/29	OUTGOING WIRE FEE		10.00	22,153.06
1/29	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		966.77	21,186.29
1/30	OUTGOING WIRE FEE		10.00	21,176.29
1/30	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		1,200.00	19,976.29
1/30	POS PURCHASE Non-PIN EASYJET K1CMMCB EASYJET GB INP900 *****5063 01/29 21:45		266.81	19,709.48
1/30	POS PURCHASE FEE ITA FEES EASYJET K1CMMC EASYJET GB INP900 *****5063 01/29 21:45		8.00	19,701.48
1/30	POS PURCHASE Non-PIN HOTEL BOOKING@CANCELON HTTPSWWW.CANC DE IN0700 *****5063 01/29 23:00		297.00	19,404.48
1/30	POS PURCHASE Non-PIN HOTEL BOOKING@CANCELON HTTPSWWW.CANC DE INC900 *****5063 01/29 23:00		276.00	19,128.48
1/31	POS PURCHASE Non-PIN ICELANDAIR 10824093503 REYKJAVIK IS 591372 *****5063 01/28 20:15		2,861.53	16,266.95
1/31	POS PURCHASE FEE ITA FEES ICELANDAIR 108240 REYKJAVIK IS 591372 *****5063 01/28 20:15		85.85	16,181.10

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Page 1 of 2

Account Number: [redacted]544
Date 02/29/20
Images: 0

Are you doing enough to protect your business? Human error can be the gateway to a cyberattack. Encourage your employees to not open suspicious emails, avoid unknown websites, and not download any software to their work computers. Visit AtlanticUnionBank.com for more tips.

STATEMENT SUMMARY AS OF 02/29/20

Account Name	Account Number	Interest Paid In 2019	Balance
SMALL BUSINESS CHECKING	[redacted]544	.00	11,559.37

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC Acct [redacted]544

Beginning Balance	2/01/20	16,181.10	
Deposits / Misc Credits	3	104,864.80	
Withdrawals / Misc Debits	21	109,486.53	
** Ending Balance	2/29/20	11,559.37	**
Service Charge		.00	
Average Balance		15,843	
Average Collected Balance		15,843	
Minimum Balance		2,514	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
2/03	OUTGOING WIRE FEE		10.00	16,171.10
2/03	OUTGOING WIRE FEE		10.00	16,161.10
2/03	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		12,500.00	3,661.10
2/03	WIRE/OUT BNF:JAMES PUNELLI		800.00	2,861.10
2/05	ATLANTIC UNION/BEB FEES PANTHERA ENTERPR		30.00	2,831.10
2/06	POS PURCHASE Non-PIN VBS*VONAGE BUSINESS 866-901-0242 GA IN7200 *****5063 02/05 22:21		206.86	2,624.24
2/06	POS PURCHASE Non-PIN PALMETTO TECHNOLOGY GR 864-436-7189 SC 058583 *****5063 02/05 03:45		109.60	2,514.64
2/12	WIRE/IN ORG:PANTHERA ENTERPRISES LLC	30,200.00		32,714.64
2/12	INCOMING WIRE FEE		15.00	32,699.64
2/12	OUTGOING WIRE FEE		10.00	32,689.64
2/12	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		20,000.00	12,689.64
2/13	DCD/Misc Pay PANTHERA TRAININ	30,200.00		42,889.64
2/18	OUTGOING WIRE FEE		10.00	42,879.64
2/18	WIRE/OUT BNF:PANTHERA ENTERPRISES LLC		34,160.00	8,719.64
2/21	POS PURCHASE Non-PIN		2,009.53	6,710.11

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC

Account Number: [redacted]544
Date: 02-29-20
Images: 0

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
	FLIGHTNETWORK-FLIGHTS 855-9769102 WA 000000 *****5063 02/20 03:23			
2/21	GO DADDY/WEB ORDER Punelli		226.70	6,483.41
2/24	DCD/Misc Pay PANTHERA TRAININ	44,464.80		50,948.21
2/24	OUTGOING WIRE FEE		10.00	50,938.21
2/24	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		8,626.65	42,311.56
2/24	POS PURCHASE Non-PIN DNH*GODADDY.COM 480-5058855 AZ 292830 *****5063 02/22 20:01		299.99	42,011.57
2/25	POS PURCHASE with PIN USPS KIOSK 51510 LEESBURG VA 009550 *****5063 02/25 09:49		15.50	41,996.07
2/26	OUTGOING WIRE FEE		10.00	41,986.07
2/26	WIRE/OUT BNF:PANTHERA ENTERPRISES LLC		30,200.00	11,786.07
2/28	GO DADDY/WEB ORDER Punelli		226.70	11,559.37

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Page 1 of 1

Account Number: [redacted]544
Date 03/31/20
Images: 0

The current COVID-19 situation we are facing is unprecedented. In these times of uncertainty, our commitment to clients, Teammates and communities remains strong. As always, your Relationship Manager is available to answer questions and provide assistance.

STATEMENT SUMMARY AS OF 03/31/20

Account Name	Account Number	Interest Paid In 2019	Balance
SMALL BUSINESS CHECKING	[redacted]544	.00	709.37

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC Acct [redacted]544

	Beginning Balance	3/01/20	11,559.37	
	Deposits / Misc Credits	0	.00	
	Withdrawals / Misc Debits	5	10,850.00	
**	Ending Balance	3/31/20	709.37	**
	Service Charge		.00	
	Average Balance		1,061	
	Average Collected Balance		1,061	
	Minimum Balance		709	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
3/02	OUTGOING WIRE FEE		10.00	11,549.37
3/02	OUTGOING WIRE FEE		10.00	11,539.37
3/02	WIRE/OUT BNF:PUNELLI PARTNERS LIMITED CO		10,000.00	1,539.37
3/02	WIRE/OUT BNF:JAMES PUNELLI		800.00	739.37
3/04	ATLANTIC UNION/BEB FEES PANTHERA ENTERPR		30.00	709.37

Atlantic Union Bank

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG VA 20175-3017

Page 1 of 1
Account Number: [redacted]544
Date 04/30/20
Images: 0

Anytime. Anywhere. Do your business banking remotely with Mobile Banking. Check balances, pay bills, make deposits - however you bank, we've got you covered. Download Atlantic Union Bank's mobile app at the App Store or Google Play today.

STATEMENT SUMMARY AS OF 04/30/20

Account Name	Account Number	Interest Paid In 2019	Balance
SMALL BUSINESS CHECKING	[redacted]544	.00	3,684.37

SMALL BUSINESS CHECKING PANTHERA TRAINING CENTER LLC **Acct 8521808544**

Beginning Balance	4/01/20	709.37	
Deposits / Misc Credits	1	3,020.00	
Withdrawals / Misc Debits	2	45.00	
** Ending Balance	4/30/20	3,684.37	**
Service Charge		.00	
Average Balance		981	
Average Collected Balance		981	
Minimum Balance		679	

Transaction Detail

Date	Activity Description	Deposits	Withdrawals	Balance
4/03	ATLANTIC UNION/BEB FEES PANTHERA ENTERPR		30.00	679.37
4/28	WIRE/IN ORG:PANTHERA TRAINING, LLC	3,020.00		3,699.37
4/28	INCOMING WIRE FEE		15.00	3,684.37

Atlantic Union Bank

June 5, 2020

DOUGLAS E KAHLE
308 CEDAR LAKES DRIVE, 2ND FLOOR
CHESAPEAKE, VA 23322

In Re: PANTHERA TRAINING

Dear Douglas Kahle, Esquire

In response to the follow-up request for account information dated June 04, 2020 phone call. The transaction of $8,100.00 was not actual wire but an online transaction between Panthera Training Center LLC and Panthera Worldwide LLC. The date of this transaction was October 21,2019 11:09 am.

If you have any questions or concerns relative to our response, please contact me at the numbers listed below.

Sincerely,

William Vaughan
Centralized Fulfillment Representative
Atlantic Union Bank
PO Box 940
Ruther Glen, VA 22546
P 804-448-0751 T 804-589-3065 F 804-633-1415
william.vaughan@atlanticunionbank.com

Account Agreement

Date: 10/04/2019

Institution Name & Address

Leesburg-Fort Evans
Atlantic Union Bank
538 Fort Evans Rd NE
Leesburg, VA 20176

Internal Use

Account Title & Address

PANTHERA TRAINING CENTER LLC
215 DEPOT CT SE FL 2
LEESBURG, VA 20175-3017

Enter **Non-Individual Owner Information** on page 2. There is additional **Owner/Signer Information** space on page 2.

☐ If checked, this is a temporary account agreement.

Number of signatures required for withdrawal: 001 .

Owner/Signer Information 1

Name	JAMES V PUNELLI
Relationship	Authorized Signer
Address	2637 E ATLANTIC BLVD # 34736, POMPANO BEACH, FL 33062-4939
Mailing Address (if different)	
Gov't Issued Photo ID (type, number, state, issue date, exp. date)	[redacted]
Other ID (description, details)	
Employer	
Previous Financial Inst.	ATLANTIC UNION BANK
E-Mail	JAMES@PUNELLI.COM
Work Phone	
Home Phone:	Mobile Phone: 703-283-4637
Birth Date: 2/20/1962	SSN/TIN: [redacted]

Ownership of Account

The specified ownership will remain the same for all accounts.

☐ Individual
☐ Joint with Survivorship (not as tenants in common) { X _____
☐ Joint with No Survivorship (as tenants in common) { X _____

☐ Sole Proprietorship or Single Member LLC ☐ Partnership
☒ LLC-enter tax classification (☐ C Corp ☐ S Corp ☒ Partnership)
☐ C Corporation ☐ S Corporation ☐ _____
☐ Trust-Separate Agreement Dated: _____
☐ _____

Beneficiary Designation

(Check appropriate ownership above.)

☐ Revocable Trust ☐ Pay-On-Death (POD)
☐ _____

Beneficiary Name(s), Address(es), and SSN(s)

(Check appropriate beneficiary designation above.)

Signature(s)

The undersigned authorize the financial institution to investigate credit and employment history and obtain reports from consumer reporting agency(ies) on them as individuals. Except as otherwise provided by law or other documents, each of the undersigned is authorized to make withdrawals from the account(s), provided the required number of signatures indicated above is satisfied. The undersigned personally and as, or on behalf of, the account owner(s) agree to the terms of, and acknowledge receipt of copy(ies) of, this document and the following:

☒ Terms & Conditions ☒ Truth in Savings ☒ Funds Availability
☒ Electronic Fund Transfers ☒ Privacy ☒ Substitute Checks
☒ Common Features ☐ _____

☐ Authorized Signer (See Owner/Signer Information for Authorized Signer Designation(s).)

The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

(1): [X JAMES V PUNELLI]
I.D. # [redacted] D.O.B. 2/20/1962

(2): [X]
I.D. # _____ D.O.B. _____

(3): [X]
I.D. # _____ D.O.B. _____

(4): [X]
I.D. # _____ D.O.B. _____

Owner/Signer Information 2

Name	
Relationship	
Address	
Mailing Address (if different)	
Gov't Issued Photo ID (type, number, state, issue date, exp. date)	
Other ID (description, details)	
Employer	
Previous Financial Inst.	
E-Mail	
Work Phone	
Home Phone:	Mobile Phone:
Birth Date:	SSN/TIN:

Owner/Signer Information 3

Name	
Relationship	
Address	
Mailing Address (if different)	
Gov't Issued Photo ID (type, number, state, issue date, exp. date)	
Other ID (description, details)	
Employer	
Previous Financial Inst.	
E-Mail	
Work Phone	
Home Phone:	Mobile Phone:
Birth Date:	SSN/TIN:

Owner/Signer Information 4

Name	
Relationship	
Address	
Mailing Address (if different)	
Gov't Issued Photo ID (type, number, state, issue date, exp. date)	
Other ID (description, details)	
Employer	
Previous Financial Inst.	
E-Mail	
Work Phone	
Home Phone:	Mobile Phone:
Birth Date:	SSN/TIN:

Important Account Opening Information. Federal law requires us to obtain sufficient information to verify your identity. You may be asked several questions and to provide one or more forms of identification to fulfill this requirement. In some instances we may use outside sources to confirm the information. The information you provide is protected by our privacy policy and federal law.

Non-Individual Owner Information

Name	PANTHERA TRAINING CENTER LLC
State:Country & Date of Organization	VIRGINIA USA 10/04/19
Nature of Business	
Address	215 DEPOT CT SE FL 2, LEESBURG, VA 20175-3017
Mailing Address (if different)	
Authorization/ Resolution Date	
Previous Financial Inst.	ATLANTIC UNION BANK
E-Mail	jpunelli@pantheraworldwide.com
Phone	304-530-5555
EIN [redacted]	Mobile Phone:

Account Description	Account #	Initial Deposit/Source
SMALL BUSINESS CHECKING	8521808544	$ 1,000.00 ☐ Cash ☐ Check ☒ UBSH CHECKING
		$ ☐ Cash ☐ Check ☐
		$ ☐ Cash ☐ Check ☐

Services Requested

☐ ATM ☐ Debit/Check Cards (No. Requested: _____)

☐ _____ ☐ _____

☐ _____ ☐ _____

Backup Withholding Certifications

(If not a "U.S. Person", certify foreign status separately)

☒ By signing signature field (1) on this document, I certify under penalties of perjury that the statements made in this section are true and that I am a U.S. citizen or other U.S. person (as defined in the instructions).

☒ **Taxpayer I.D. Number - TIN** [redacted]
The Taxpayer Identification Number (TIN) shown is my correct taxpayer identification number.

☒ **Backup Withholding.** I am not subject to backup withholding either because I have not been notified that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the Internal Revenue Service has notified me that I am no longer subject to backup withholding.

☐ **Exempt Recipients.** I am an exempt recipient under the Internal Revenue Service Regulations. Exempt payee code (if any) _____

FATCA Code. The FATCA code entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Other Terms/Information