

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

CASE NUMBER:

JILLIAN AMADOR,

Petitioner,

v.

**STRENGTHEN ORLANDO, INC. d/b/a
ONEORLANDO FUND and KENNETH
FEINBERG, as Fund Administrator of
the ONEORLANDO FUND,**

Respondent.

**PETITIONER'S VERIFIED EMERGENCY *EX PARTE* PETITION FOR
TEMPORARY INJUNCTION AND REQUEST FOR FUND AUDIT**

COMES NOW, Petitioner, JILLIAN AMADOR, by and through the undersigned attorney, pursuant to Rule 1.610, Florida Rules of Civil Procedure, and respectfully submits this Verified Emergency *Ex Parte* Petition for Temporary Injunction and Request for Fund Audit against the Respondents, ONEORLANDO FUND and KENNETH R. FEINBERG, as Fund Administrator of the OneOrlando Fund. The following Verified Emergency *Ex Parte* Petition for Temporary Injunction and Request for Fund Audit qualifies as an emergency because Respondent is scheduled to distribute \$27,000,000.00 +/- on September 27, 2016, prior to a complete audit taking place. As grounds therefore, Petitioner states the following in support thereof:

I. STATEMENT OF JURISDICTION

1. This is an action for the equitable remedy of an Emergency *Ex Parte* Temporary Injunction and Request for Fund Audit and proper before this Honorable Court.

2. At all material times hereto, Petitioner, JILLIAN AMADOR, was a resident of Orange County, Florida.

3. The subject incident occurred in Orange County, Florida

4. The threatened harm to be enjoined will be imposed in Orange County, Florida.

5. At all material times, Respondent, STRENGTHEN ORLANDO, INC. d/b/a ONE ORLANDO FUND is a Florida Not for Profit Corporation that does business in Orange County Florida.

6. At all material times hereto, Respondent, KENNETH R. FEINBERG, an attorney with offices located in Washington, D.C., and he availed himself to the jurisdiction of the Honorable Florida Courts by serving as Fund Administrator for STRENGTHEN ORLANDO, INC. d/b/a ONE ORLANDO FUND.

7. Accordingly, this Honorable Court has jurisdiction of the present Emergency *Ex Parte* Temporary Injunction and Request for Fund Audit.

II. INTRODUCTION AND CONTEXTUAL BACKGROUND

The City of Orlando changed forever on June 12, 2016. At or around last call (2 a.m.), Omar Mateen walked into the Pulse Nightclub, located at 1912 S Orange Ave, Orlando, FL, armed with a SIG Sauer MCX semi-automatic rifle and a 9mm Glock 17 semi-automatic pistol and opened fire on patrons in the nightclub. The vicious aftermath left forty-nine (49) people dead and an additional fifty-four (54) people injured. Countless other people escaped uninjured but are forced to carry the burden of having watched their best friends, partners, and acquaintances slaughtered by a madman in the name of hatred. In total, the horror of the Pulse Massacre left our City Beautiful scarred by the single largest mass shooting in the history of the United State of America.

In the hours following the news of the tragedy, benevolent donors from all over the world gave money in support of the victims and survivors. On July 1, 2016, the City of Orlando announced a consolidation of funds with other local and national organizations that also collected donations, in order to coordinate the proper distribution to victims and the family of victims.¹ Pursuant to a press release issued by the City of Orlando, the purpose of the consolidation was to distribute the funds in an “open, transparent and fair manner.”² The consolidated monies were to be distributed under the umbrella of the OneOrlando Fund. The City of Orlando appointed Kenneth R. Feinberg to serve as the fund administrator.

Mr. Feinberg has built a career based upon managing funds related to various other national tragedies, including but not limited to 9/11, the Boston Marathon bombing, Virginia Tech, the BP Oil Spill, Aurora, and others. Mr. Feinberg has worked for major corporations that faced multi-million dollar scandals, including Volkswagen, and bailouts, like General Motors. He was hired by politicians in various contexts, such as by Donald Rumsfeld for management of the 9/11 Fund, and by President Obama for the TARP Executive Fund distribution.

Despite his service to mourning communities and to businesses embroiled in consumer-harming scandals, Kenneth R. Feinberg is not a stranger to controversy. Notably, Mr. Feinberg was removed from his role as fund administrator for the BP fund when a federal judge ruled that Mr. Feinberg was *not* independent, due to a determination that Mr. Feinberg’s law firm was being paid \$1,250,000.00 per month.³ Mr. Feinberg was caught in another lie when he told news organizations that he was serving pro-bono and was *not* being paid for his services as the Pay

¹ The OneOrlando Fund comprised of to the City of Orlando, Equality Florida, the GLBT Community Center of Central Florida (The Center) and the National Compassion Fund formed a partnership with OneOrlando to ensure that funds collected and disbursed in unified process: <http://www.cityoforlando.net/mayor/2016/07/oneorlando-fund-update/>

² *Id.*

³ https://en.wikipedia.org/wiki/Kenneth_Feinberg

Czar for TARP oversight. Fact-check websites ultimately performed a Freedom of Information Act request that proved otherwise. In fact, Mr. Feinberg was being paid an annual salary of \$120,830.00 from the United States government.⁴ Moreover, there have been questions raised regarding the amount of donations in a fund that contradict the amounts ultimately given to victims and proper claimants. While Mr. Feinberg was a Fund Administrator for the Virginia Tech Massacre, one of the Fund's claimants said,

'They gave a rough idea, saying there was about \$7 million in the fund. In reality, Virginia Tech had taken in close to \$100 million dollars at that time. We were rushed to fill in a piece of paper and submit it back to them; the deadline was September 15, 2007. After the disbursement, we found out that the school took in more than \$100 million.⁵

The question of whether proper claimants received the full amount to which they are entitled after a distribution by Mr. Feinberg applies not only historically to various funds created after a tragedy, but now to the instant matter, the OneOrlando Fund.

III. FACTS

8. On June 12, 2016, Petitioner, JILLIAN AMADOR, was physically present inside of Pulse Nightclub when a deranged madman, Omar Mateen, ruthlessly murdered forty-nine (49) people and injured fifty-four (54) others. Ms. Amador witnessed several of her friends injured and killed.

9. Petitioner, JILLIAN AMADOR, suffered physical injuries to her face, abdomen, arms, legs, back and feet before narrowly escaping with her life, and no less important, life-long psychological trauma from the events that transpired.

⁴ <http://www.breitbart.com/big-government/2010/09/15/what-is-obama-s-pay-czar-s-pay/>

See also *Forbes*, which reported in August 2009 (via *Reuters*), "Feinberg is receiving no compensation for his role" [as Pay Czar].

⁵ http://www.collegiatetimes.com/news/virginia_tech/april-hokie-spirit-memorial-fund-remains-hot-button-issue/article_e8c2706d-4f00-5b4f-a8a7-d545a3e8a220.html

10. On August 4, 2016, the OneOrlando Fund held a public town hall meeting at the Amway Arena led by the Fund Administrator, KENNETH R. FEINBERG. The stated purpose of the town hall meeting was to discuss the “Draft Protocol” (attached hereto as Exhibit “A”) and to welcome questions from victims and their families, and the general public. At the town hall, Mr. Feinberg, stated that the ONEORLANDO fund contained approximately \$23 million dollars in donations.

11. Petitioner, JILLIAN AMADOR, had various concerns regarding the “Draft Protocol.” Petitioner, through counsel sent a correspondence to Respondents ONEORLANDO FUND and KENNETH FEINBERG expressly stating her concerns, objections and requesting a face-to-face meeting as required by the “Draft Protocol”. See a copy of said correspondence attached hereto as Exhibit “B.”

12. On August 12, 2016, Respondent, ONEORLANDO FUND, released its “Final Protocol.” See attached hereto as Exhibit “C.” This protocol is the document that purportedly dictates how the Fund will be managed, disbursed and audited.

13. On August 29, 2016, the undersigned attorney received a return correspondence from Mr. Feinberg’s office, acknowledging Petitioner’s correspondence and request for a face-to-face meeting with the Fund Administrator. See a copy of said correspondence attached hereto as Exhibit “D.”

14. On August 30, 2016, the undersigned attorney spoke over the phone to Mr. Feinberg regarding Petitioner’s concerns surrounding the method of distribution, management of the fund from its various comprising funds. During said phone call, Respondent, KENNETH FEINBERG, stated expressly that he agreed to have an independent “audit” of the Fund prior to

dispersal. Later that evening, the undersigned attorney memorialized said phone call with the correspondence attached hereto as Exhibit “E.”

15. As of the time of filing the present Emergency Petition, ONEORLANDO FUND, by and through the fund administrator, KENNETH FEINBERG, have NOT released any audits of any of the subject funds.

16. On September 21, 2016, ONEORLANDO FUND and KENNETH FEINBERG, released three documents on the ONEORLANDO FUND website under the heading “Independent Accountant’s Reports on Applying Agreed-Upon Procedures (Audit).” See screenshot of website referencing said Reports attached hereto as Exhibit “F.” A copy of each of the Accountants’ Reports is attached hereto as Composite Exhibit “G.”

17. Based upon the foregoing, the following legal argument and the attachments referenced hereto, Petitioner, JILLIAN AMADOR, respectfully requests that this Honorable Court GRANT Petitioner’s Ex Parte Petition for Temporary Injunctive Relief and Request for Fund Audit.

IV. LEGAL ARGUMENT

A. Standard of Review

A temporary injunction may be entered if the party seeking the injunction establishes the following elements: (1) the likelihood of irreparable harm; (2) the unavailability of an adequate remedy at law; (3) a substantial likelihood of success on the merits; and (4) considerations of the public interest. Rule 1.601 of the Florida Rules of Civil Procedure provides, in pertinent part, that a temporary injunction may be granted with-out written or oral notice to the adverse party only if: it appears from the specific facts shown by affidavit or verified pleading that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be

heard in opposition; and the movant's attorney certifies in writing any efforts that have been made to give notice and the reasons why notice should not be required.

An order granting injunctive relief lies within the sound discretion of the trial court and will be affirmed absent an abuse of discretion (emphasis added). *Precision Tune Auto Care, Inc. v. Radcliff*, 731 So. 2d 744 (Fla. 4th DCA 1999); *Browning-Ferris Indus. of Florida, Inc. v. Manzella*, 694 So. 2d 110, 112 (Fla. 4th DCA 1997). The facts stated herein demonstrate that the foregoing factors weigh heavily in favor of the issuance of a temporary injunction.

B. Petitioner Will Suffer Irreparable Harm Unless the Injunction is GRANTED

A claimant must establish irreparable harm such that there is no adequate legal remedy at law. See *Stand Up for Animals, Inc.*, 69 So.3d at 1013; *B.G.H. Ins. Syndicate, Inc. v. Presidential Fire & Cas. Co.*, 549 So.2d 197, 198 (Fla. 3d DCA 1989); *Mullinix v. Mullinix*, 182 So. 2d 268, 269-70 (Fla. 4th DCA 1966). Most importantly, Petitioner recognizes that this dispute revolves around the distribution of donations. Notwithstanding, it should be pointed out that if these funds are distributed, there is a high likelihood that the Fund will NOT be able to get the money back, if distributed incorrectly. Moreover, given the charitable nature of the organizations distributing this money, victims are far less likely to pursue a legal remedy given such status. Moreover, the Fund's express mission statement requires distribution of the funds to be performed in an "open, transparent and fair manner."⁶ Petitioner and other claimants of the fund can never be made whole if the funds are disbursed improperly. Unquestionably, the money in the fund is a specific, identifiable, unique and irreplaceable because it was given specifically to (Pulse) victims by specific donors (the general public), who intended it be allocated to a specific purpose (the well-being of those impacted by this National tragedy).

⁶ <http://www.cityoforlando.net/mayor/2016/07/oneorlando-fund-update/>

Moreover, Petitioner lacks the ability to avoid the harm that Respondents will cause if the funds are disbursed prior to a full, independent audit. Should funds be distributed prior to a full and independent audit, any claim for misappropriation would be extinguished before it could be found. The National Council of Nonprofits states that the objective of a financial review conducted by an independent auditor is to examine the nonprofit's financial statements... however, "a review is not conducted with the same level of investigation or analysis as an independent audit."⁷ The initial Accountant's Reports, released by four component funds of the overall OneOrlando Fund provide a glimpse of the receivables and the general ledger for each fund's bank accounts, but **these reports undisputedly are NOT audits**. More specifically, the Accountant's Reports for Equality Florida Institute Inc. and Equality Florida Action, Inc. ("Equality Florida"), GLBT Community Center of Central FL, Inc. ("The Center"), National Center for Victims of Crime each state: "We were not engaged to, and did not, conduct an audit..." Similarly, Respondent, STRENGTHEN ORLANDO, INC. d/b/a "ONEORLANDO FUND" released an Accountants' Report on September 21, 2016 that provided the receipts and disbursements of the fund from June 12, 2016 through September 15, 2016.

While the audit reports provide information regarding the activities and status of each fund's receivables and disbursements, an independent audit will examine not only the financial statements of each fund, but provide details of all incoming monies, review of hard costs, and most importantly render an opinion as to whether the statement fairly and accurately depict the actual donations received by the ONEORLANDO FUND. The goal of an audit is to ensure the information provided by the funds is reliable and conforms with the proper financial reporting framework.

⁷ <https://www.councilofnonprofits.org/nonprofit-audit-guide/what-is-a-review>

If Respondents deny any pre-disbursement audit, Petitioner and hundreds of other potential claimants will be denied recourse and relief should there be errors in the amounts disbursed or inconsistencies in the handling of the Fund. Moreover, “the prevention of continuing wrongs is a well recognized basis for injunctive relief, as is the prevention of a multiplicity of suits.” *Dotolo v. Schouten*, 426 So. 2d 1013 (Fla. 2d DCA 1983) at 1015 (citing *29 Fla.Jur.2d Injunctions* § 15; *22 Fla.Jur.2d Equity* §§ 15, 16).

By contrast, Respondents will suffer no harm by maintaining the Fund intact until a full independent audit of the Fund is completed and made public. Respondents have promised that a full audit will be completed within two weeks after the Fund distribution ends. Respondents have no interest and no stake in the Funds. As such, there is no harm to Respondents in beginning dispersal after a full, independent audit is released to the victims and the general public.

To be clear, a pre-dispersal audit is absolutely necessary to ensure that these public monies are being distributed in an “open, transparent and fair manner” as promised by the City of Orlando, the ONEORLANDO FUND, and KENNETH R. FEINBERG, himself. Given the large amount of money involved, the questionable parties handling the monies, the ever-present likelihood of fraudulent claims, and the hundreds of claimants involved with this fund – there is an obvious need for a close review not only of the Fund administration, but of the claimants themselves in order to ensure the Fund dispersal is free of negligence and fraud. As it stands, there is a high likelihood that Petitioner, the numerous other victims and families, the City of Orlando, and the benevolent donors from around the world will all suffer irreparable harm if these funds are not distributed properly and fairly. Accordingly, the foregoing Emergency Petition and Request for Fund Audit must be GRANTED.

C. There Is No Adequate Remedy at Law to Protect Petitioner's Interests

Petitioner has no adequate remedy in law for the harm once the OneOrlando Fund disbursement occurs, which is currently stated to begin on September 27, 2016. Petitioner can never be made whole if there is an improper disbursement, as the Fund proceeds are unique. The same is true for the hundreds of claimants to the Fund. As the Florida Supreme Court once stated, "relief delayed is relief denied." *Capraro v. Lanier Business Products, Inc.*, 466 So.2d 212, 213 (Fla. 1985). Upon delivery of these funds to improper recipients, Petitioner will have no other recourse under the law to recover these specific donations related to the ONEORLAND FUND.

D. Petitioner is Likely to Succeed on the Merits

Petitioner has a substantial likelihood to succeed on the merits of her claim. The subject funds were amassed via donations from members of the public seeking to provide assistance to victims and survivors of the Pulse tragedy. The Fund Administrator has promised that the entirety of the Fund would be disbursed to (approved) claimants. However, the Independent Accountants' Report for Respondent ONEORLANDO FUND revealed that disbursements were made from the Fund toward merchant credit card processing fees in the amount of \$32,423. The credit card companies identified in the Accountants' Report have contributed \$27,422 of these fees back to the Fund. This leaves \$5,001 paid from the Fund to the credit card companies. The payment to the credit card companies from the Fund is in direct conflict to Respondents' repeated assertions that 100% of the Fund would go to victims and their families. Given that Petitioner has been given such a small sample of information and Petitioner is NOT an accountant, herself, there is unquestionably a high likelihood that other discrepancies also exist. As such, Petitioner's request for a pre-distribution audit is warranted based upon the preliminary

information provided in the Accountants' Reports. The emergency temporary injunction on the Fund distribution should be granted so that a full and independent audit of the Fund is completed and released to the public prior to disbursement.

E. Issuance of a Temporary Injunction Would Not Be Adverse to the Public Interest

The temporary injunctive relief requested enforces Respondents' duty to serve the public interest by making available to the public a full independent audit of the Fund. As stated, the Fund promises to make distributions in an "open, transparent and fair manner." The proper distribution of this specific Fund, which originates from donations from the public intended to directly benefit victims and survivors of the Pulse massacre, is a significant matter of public interest. The requested relief will serve the public interest by ensuring that 100% of the funds donated by the public are properly disbursed to 100% of the valid Fund claimants, as promised by Respondents, ONEORLANDO FUND and KENNETH R. FEINBERG. In sum, there is a strong public interest in making sure that donations are received by their intended beneficiaries. Accordingly, public interest is ensured when charitable organizations are held to the standards that they set out for themselves through their own mission statements and stated intentions. Petitioners, the ONEORLANDO FUND and KENNETH R. FEINBERG, have stated that publicly and through websites that 100% of all donations will go to the victims and the families of victims. Moreover, the stated purpose of the ONEORLANDO FUND is to operate in a "open, transparent and fair manner." Petitioner asserts affirmatively that asking Respondents for an audit of funds is entirely consistent with the Respondent's stated purpose, mission, and goals.

Notwithstanding, this Honorable Court may consider an uncontested dispersal amount for a portion of the Fund so as to allow claimants to receive Fund proceeds on the date promised by

the Fund Administrator, but also issue an injunction on the balance of the Fund until a full and independent audit is complete. For example, the Court may order that the Fund Administrator disburse fifty percent of the Fund to claimants on the promised date, but withhold the remaining fifty percent until a full and independent audit is released. This is in addition to the promised post-disbursement Fund independent audit, set to occur on or about October 15, 2016. Under both options, the urgency for a proper audit prior to the full disbursement of the Fund is entirely warranted given the few days remaining until the Fund Administrator begins to issue payments.

V. ATTORNEY CERTIFICATION

Pursuant to Rule 1.610 Fla. R. Civ., the undersigned attorney hereby certifies that he has made his best efforts to give notice to Respondents, ONEORLANDO FUND and KENNETH R. FEINBERG of this Verified Emergency *Ex Parte* Petition for Temporary Injunction. Notice should not be required because the Fund is set to begin its distribution on September 27, 2016, Respondent, KENNETH R. FEINBERG is located in a foreign jurisdiction, and Petitioner will suffer immediate irreparable harm if the requested injunction is not issued prior to the distribution of the Fund.

PRAYER FOR RELIEF

WHEREFORE, Petitioner, JILLIAN AMADOR, by and through the undersigned attorney, respectfully requests this Honorable Court enter judgment on the following:

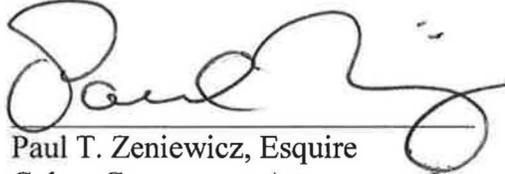
A. That a temporary injunction of the dispersal of the ONEORLANDO FUND be issued and so that a full and independent audit of the Fund is completed and released to the public;

B. That alternatively, a temporary injunction be issued on a portion of the fund, and an uncontested distribution, such amounts to be decided by this Honorable Court, whereby there are

sufficient monies available in the Fund for a second dispersal to allow for relief in the event of discrepancies from a resulting full and independent audit,

C. That the Court appoint an independent auditor to complete the audit of the Fund, and any other relief that this Honorable Court deems just and proper.

Respectfully Submitted,



Paul T. Zeniewicz, Esquire
Cohen Grossman – Attorneys at Law
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Dated this 23RD day of September, 2016.

VERIFICATION

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this verified petition and that the punishment for knowingly making a false statement includes fines and/or imprisonment, and irreparable harm and damage will result if the relief is not granted.



JILLIAN AMADOR
c/o Cohen Grossman, Attorneys at Law
350 North Lake Destiny Road
Maitland, Florida 32751

Dated this 23rd day of September, 2016.



personally known to me (SD)

Exhibit “A”



OneOrlando Fund

DRAFT PROTOCOL

JULY 13, 2016

This is a draft Protocol. The Final Distribution Protocol, which will govern the OneOrlando Fund (the "Fund"), will be developed by the Administrators, incorporating feedback from the OneOrlando Fund Board, Equality Florida, the National Center for Victims of Crime/National Compassion Fund, the Orlando Community and the general public, including those present at the Town Hall meetings to be held by the Administrators on August 4, 2016.

All aspects of this draft Protocol, including without limitation, the classifications of claimants, the distribution criteria, the claims process, timetable, and amounts to be awarded, may be revised and are subject to the full and complete discretion of the Administrators.

The OneOrlando Fund was established through the generosity of businesses, foundations and individual donors. OneOrlando Fund will be used to assist those families of the victims who were killed, the victims who were physically injured and the victims who were physically present during the shootings inside the Pulse Nightclub in Orlando, Florida on June 12, 2016 (the "Pulse Nightclub Attack"). OneOrlando is a project within Strengthen Orlando, Inc., a 501 (c)(3) nonprofit organization, Federal Tax ID #27-1964941 and Florida Registration #CH32010. The National Compassion Fund is a project of the National Center for Victims of Crime, a 501(c)(3) nonprofit organization, Federal Tax ID #30-0022798 and Florida Registration #CH21962.

The payments from the Fund are to be apportioned to the victims in accordance with the severity of the injuries arising from the Pulse Nightclub Attack.¹

The Distribution classifications are outlined below:

PRIORITIZATION OF ELIGIBLE INDIVIDUAL CLAIMS

A. Individual Death Claims

Eligible claimants for deceased victims killed as a result of the Pulse Nightclub Attack will receive the highest category of payment under the scope of this Protocol. (A final payment determination will be made upon receipt of all pertinent data and is subject to all comments above.)

¹ Determination of the amounts for each eligible claimant will depend upon the following: 1) the balance in the OneOrlando Fund on September 26, 2016; 2) the receipt of updated data regarding the nature and the number of physical injuries, and the number of individuals physically present inside the Pulse Nightclub; 3) completion of the review of all submitted claims; and 4) review and approval by the Administrators.

B. Individual Physical Injury Claims for Victims Requiring Overnight Hospitalization

Eligible claimants who were physically injured and hospitalized for one or more nights between June 12, 2016 and September 12, 2016 (the last day to submit a claim to the Fund) due to physical injuries resulting from the Pulse Nightclub Attack will receive payment under this Final Protocol.

C. Individual Physical Injury Claims of Victims Treated at Orlando Area Hospitals on an Emergency Out-Patient Basis

Eligible Claimants who were physically injured as a result of the Pulse Nightclub Attack who were treated on an emergency out-patient basis (within 24 hours of the shootings) at one of the Orlando, Florida area hospitals, and released without an overnight hospital stay, will receive a payment under this Final Protocol.

D. Individual Claims of Victims Present Inside the Pulse Nightclub

Eligible Claimants who were physically present inside the Pulse Nightclub at the time of the Attack, but did not suffer physical injury requiring medical treatment will receive a payment under this Final Protocol. Proof of such physical presence will be based upon contemporary law enforcement records.

PROCESS AND PROCEDURES

Eligible claimants must file either a Claim Form for Deceased Victims, a Claim Form for Physical Injury or a Claim Form for Physical Presence inside the Pulse Nightclub in order to be eligible to participate and receive a payment from the Fund. A single Claim Form should be submitted for each eligible claimant.

The process and procedures for consideration of eligible claims will be as follows:

A. The Fund will be administered by Kenneth R. Feinberg, the National Center for Victims of Crime/National Compassion Fund and the OneOrlando Fund Board.

B. A uniform Claim Form and Final Protocol, in English and in Spanish, (one for a deceased victim, one for a physically injured victim and one for physical presence inside the Pulse Nightclub) will be provided to all known claimants and potential claimants by US mail and/or email. The Final Protocol and Claim Forms will also be available for download via OneOrlando.org and NationalCompassionFund.org beginning on August 11, 2016. Copies may also be requested by emailing the Fund Administrators. Only one Claim Form should be submitted by or on behalf of each victim. The Claim Form should be completed and submitted to the Fund Administrators (along with all required supporting documentation) postmarked no later than September 12, 2016. Requests for copies of the Claim Forms and questions regarding the completion of the Claim Form should be sent via email to OneOrlando@ncvc.org or by telephone to (855) 4VICTIM (855 484-2846).

C. Claim Forms should be mailed or sent via overnight courier to:

OneOrlando Fund
c/o National Center for Victims of Crime
2000 M Street, NW, Suite 480
Washington, DC 20036

D. Individual claimants may request a face-to-face personal meeting (or telephonic meeting) with the Fund Administrators before the final processing of all claims is completed. These meetings will be scheduled before the individual claim is processed but will not serve to alter the Final Protocol or any allocation set forth in the Final

Protocol. Requests to meet with the Fund Administrators should be sent by email to the Fund Administrators at OneOrlando@ncvc.org or by telephone to (855) 4VICTIM (855 484-2846).

E. In the event that a claimant submits an incomplete or deficient claim, *e.g.*, the claimant failed to include required documentation or failed to sign the Claim Form, a representative from the Fund Administrators' office will work with the claimant in an effort to cure any such deficiencies.

F. Payments will be issued immediately following the rendering of a final review and determination of all eligible claims by the Fund Administrators. The Fund Administrators will submit final payment determinations to the Chairman of the OneOrlando Fund Board for transmission of the payments, by check or electronic bank wire, to each eligible claimant. Payments will be made by electronic funds transfer or by check sent to claimants via courier service.

G. A Claim Form filed for a deceased victim will require the spouse's signature if the deceased individual was married at the time of death. In cases where the victim was not married, the personal representative legally authorized to administer the estate must sign the Claim Form. The Personal Representative must prepare a proposed plan of distribution of the funds among the decedent's legal heirs and beneficiaries. The proposed plan will be distributed to all such legal heirs and beneficiaries, each of whom must consent to the proposed distribution by signing a consent form.

H. For claims for a minor child, the Claim Form will require the signature of both parents (if both parents are living). For claims for incompetent adults, the Claim Form will require proof of representative capacity, such as a power of attorney, guardianship, appointment of guardian or attorney ad litem.

I. A Claim Form filed for a physical injury claimant must include a hospital record which confirms: i) date of admission to the hospital, ii) date of discharge from the hospital, and iii) the nature of the injury and that the injury was sustained as a result of the Pulse Nightclub Tragedy.

J. A Claim Form filed for physical presence inside the Pulse Nightclub must be corroborated by confirmation by contemporary law enforcement records.

K. The OneOrlando Fund cannot provide tax advice to those receiving payments from the Fund. The Fund Administrators recommend you consult your tax advisor for any questions regarding tax liability for these payments.

L. A full audit of the OneOrlando Fund will be conducted by an independent auditing firm as soon as possible after October 15, 2016. The results of this audit will be made available to all claimants, donors and the general public along with a Final Report from the Fund Administrators.

OUTREACH

A. The National Center for Victims of Crime/National Compassion Fund will conduct outreach to victims of the Pulse Nightclub Attack by telephone, mail, in person and other forms of electronic communication to provide them with Claim Forms, answers to questions related to the filing of claims, assist victims in curing deficiencies on Claim Forms and work to ensure that all eligible persons who wish to submit Claim Forms are able to do so before the September 12, 2016 filing deadline.

B. Two public meetings will be conducted by the Fund Administrators on August 4, 2016 at the Amway Center in Orlando, Florida (400 West Church Street, Suite 200, Orlando, FL 32801) to explain the contents of the draft Protocol and the claim submission process and to invite input and comments from potential claimants and the general public. Information collected from these group meetings and various communications and

correspondence between the claimants and other interested parties and the Fund Administrators will be considered in finalizing the Final Protocol.

C. Once finalized, the Final Protocol and the Claim Forms will be disseminated to all known and registered victims and made available on the OneOrlando.org website and the NationalCompassionFund.org website beginning on August 11, 2016. Email requests for copies of the final documents should be made to OneOrlando@ncvc.org. **The deadline for submission of the Claim Form is September 12, 2016.** The Fund Administrators will work directly with all claimants as requested to make sure that all claims are submitted by the September 12 deadline.

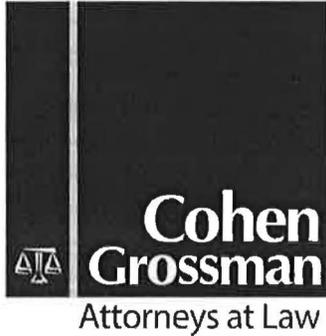
D. Optional face-to-face meetings with the Fund Administrator will be scheduled at the claimant's request. All claims will be processed during the period between September 12 and September 26, 2016. All claimants requesting face-to-face meetings with the Fund Administrators before the claim is processed will be afforded such a meeting during the period between September 12 and September 25, 2016. Meetings will be scheduled at mutually convenient times and locations. In lieu of a face-to-face meeting, the claimant may request a telephonic meeting. To request a meeting, please send your request via email to OneOrlando@ncvc.org or by telephone at (855) 4VICTIM (855 484-2846).

Victims of family members in need of services can receive assistance through the Orlando United Assistance Center. Appointments can be scheduled by calling (407) 500-HOPE (407-500-4673) or by visiting cityoforlando.net/hope.

TIMELINE

- August 4, 2016: Two Town Hall meetings at 12:30 p.m. and 6:30 p.m. conducted by the Fund Administrators in Orlando, Florida, each lasting for 90 minutes.
- August 11, 2016: The Final Protocol and Claim Forms disseminated to all known claimants and potential claimants who registered through the Fund website. These documents will be made available on the Fund website for families and all interested parties.
- August 11 – September 12, 2016: Claim Forms completed and submitted to the Fund Administrators along with the required documentation.
- September 12, 2016: Deadline for submission of Claim Forms.
- September 12 – September 25, 2016: All personal meetings requested with the Fund Administrators completed.
- September 12 – September 26, 2016: All claims reviewed by the Fund Administrators and recommendations for payments to eligible claimants submitted to the OneOrlando Fund Board for independent review and approval.
- September 27, 2016: Payment Distribution to approved eligible claimants begins on a rolling basis.
- After October 15, 2016: Independent Audit begins.

Exhibit “B”



August 8, 2016

OneOrlando Fund
c/o Nation Center for Victims of Crime
2000 M Street, NW; Suite 480
Washington, D.C. 20036

OneOrlando Fund
PO Box 4990
Orlando, FL 32802-4990

Re: Pulse Nightclub Shooting - Town Hall Meeting in Orlando, FL
My Client(s): Jillian Amador, individually, and [REDACTED]

To Whom It May Concern:

My firm represents the aforementioned two people related to the tragic events that took place on June 12, 2016, at Pulse Nightclub in Orlando, Florida. The following correspondence is in relation to the atrocity of a "Town Hall" meeting that occurred yesterday at the Amway Center. I personally attended with a colleague, an assistant, and one of my clients, Jillian Amador. The following correspondence details my formal objection(s) to the "Draft Protocol" – dated July 13, 2016 – and distributed to attendees at the 12:30pm "Town Hall" meeting. Moreover, please allow the following correspondence to serve as my formal request for the immediate removal of present Fund Administrator, Kenneth R. Feinberg. Additionally, this correspondence shall outline my general objections to the oversight and distribution of OneOrlando donations. Finally and pursuant to the "Draft Protocol", this correspondence shall serve as my clients formal request for a "face-to-face personal meeting with the Fund Administrator" at your earliest convenience.

OBJECTIONS TO "DRAFT PROTOCOL"

First, the opening paragraph of the "Draft Protocol" provides that the "[T]he Final Distribution Protocol... will govern the OneOrlando Fund." However, the "Final Distribution Protocol" is not mentioned again throughout the "Draft Protocol." My clients object to this patent ambiguity as to the terms "Draft Protocol" and "Final Distribution Protocol". My clients hereby request that the

OneOrlando Fund and/or its affiliate foundations/companies have a “The Final Distribution” document, then you immediately provide my office with a copy, if such is indeed a distinct document from the “Draft Protocol” provided at the Town Hall (and disseminated through the OneOrlando website).

Next, the “Draft Protocol” provides that the protocol “will be developed by the Administrators, incorporating feedback from the OneOrlando Fund Board, Equality Florida, the National Center for Victims of Crime/National Compassion Fund, the Orlando Community and the general public, including those present at the Town Hall meetings to be held by the Administrators on August 4, 2016.” Based upon a reading of the “Draft Protocol” itself, there is not a group of “Administrators”, there is only ONE fund administrator – Kenneth R. Feinberg. Moreover, the OneOrlando website fails to provide any additional administrators; hence, the term “Administrators” is either entirely misleading (at best) or a complete fabrication (at worst). There is NOT a group of “Administrators” (plural). In fact, there is a single administrator – Kenneth R. Feinberg.

Moreover, the opening provides “without limitation, the classifications of claimants, the distribution criteria, the claims process, timetable, and amounts to be awarded, may be revised and are subject to the full and complete discretion of the Administrators.” Outside of the previously mentioned improper use of the term “Administrators”, the totalitarian discretion of the purported administrator and/or “Administrators” is unquestionably in opposition to the OneOrlando mission statement – to distribute donations “to victim’s families and survivors in an open, transparent and fair manner.” Discretion without limitation is hardly open, transparent or fair. This type of sweeping discretion by one individual is against the spirit of American jurisprudence – and in complete derogation of transparency and fairness.

Additionally, the “Prioritization of Eligible Individual Claims” has palpable issues for various reasons. First, this “hierarchy” (as deemed by Mr. Feinberg) seems to place a higher value on “physical” injuries than it does on mental or psychological injuries, given that mental psychological injuries are not contemplated at all within the “Draft Protocol”. I should NOT have to recite the facts to you. Here, a terrorist took over a nightclub during last call at gay bar. Not everyone in the club was killed or physically injured. Notwithstanding, EVERYONE who was present and survived the massacre carries a burden that you can never understand. It is fundamentally absurd to say that a family that disowned their gay child has a sits on top of the “hierarchy”, than a person trapped underneath his dead friends, while playing dead, as a lunatic prowled and hovered over the uninjured person for hours, while screaming unthinkable obscenities and firing countless rounds of bullets into the air and at other patrons.

Next, the “Process and Procedures” section anoints Kenneth R. Feinberg as the Fund Administrator. Notwithstanding my objections above, it is hard to understand how a person that has the express authority to alter the “protocol” at any time and for any reason – is the same exact person that decides how the donations are distributed to victims and victim’s families. This seems like a classic case of Mr. Feinberg playing the judge, the jury, and the executioner. Again, this type of procedure is fundamentally NOT open, transparent, or fair.

Section “T” of the “Process and Procedures” section states that a claim form “must include a hospital record which confirms: i) the date of admission to the hospital, ii) date of discharge from the

hospital, and iii) the nature of the injury and that the injury was sustained as a result of the Pulse Nightclub Tragedy.” This is in direct opposition to the utter nonsense that Mr. Feinberg spewed yesterday at the Town Hall meeting, which included various affirmations that hospital records are NOT necessary to the application process. Given the limited time to apply for benefits, and the even more limited time for OneOrlando to review and distribute the funds – clear directions are absolutely necessary for the prompt and proper allocation of OneOrlando Fund monies.

Section “L” of the “Process and Procedures” section states a “full audit of the One Orlando Fund will be conducted by an independent auditing firm as soon as possible after October 15, 2016.” It should be noted that the “Draft Protocol” states later that the OneOrlando funds are being distributed on September 27, 2016. Why would the independent audit occur nearly a month after the funds are supposed to be distributed? What if the independent audit determines that some of the funds were misallocated? Is there a procedure for the correction for the misallocation of OneOrlando funds? This type of question needs to be answered before Mr. Feinberg is given the authority to distribute OneOrlando Fund monies.

Section “B” of the “Outreach” portion of the “Draft Protocol” states that “public meeting will be conducted by the Fund Administrators on August 4, 2016... to invite input and comments from potential claimants and general public.” I represent two potential claimants and am a member of the general public. When I asked a simple question regarding the questionable timing of the independent audit, Mr. Feinberg responded by asking me when I thought the independent audit should occur? Not only did Mr. Feinberg dodge my question, his answer was evasive and entirely counter-productive. Simply stated, Mr. Feinberg was as non-responsive to me as he was to the other attendees that posed questions to him.

REQUEST FOR IMMEDIATE REMOVAL OF ADMINISTRATOR

Mr. Feinberg’s tone and demeanor at the 12:30pm Town Hall were atrocious and an absolute embarrassment to the noble and virtuous work done by OneOrlando. Mr. Feinberg was unnecessarily boisterous, frequently confrontational, and generally uninformative. On several occasions, Mr. Feinberg cut off potential claimants by answering questions before the claimant could finish the question. Other times, Mr. Feinberg was expressly gave legal advice when his interest is clearly different than the claimants. Most often, Mr. Feinberg gave non-responsive answers that did NOT coincide with the materials provided to the claimants.

Mr. Feinberg is NOT licensed to practice law in the State of Florida. Notably, he gave inaccurate and improper legal advice on Florida probate law regarding personal representatives. He also made assumptions and representations about Florida’s Probate code to give claimants an order on who can be a personal representative for the estate of deceased victims “in about thirty minutes” or “in an hour.” These were promises made to the public by an outsider to the Florida Bar. Additionally, when questioned about the possibility of having to pay back the Crime Victim Fund in the event of a payment from the OneOrlando Fund, Mr. Feinberg responded in circuitous double-speak, and said OneOrlando distributes funds to claimants regardless of other payments. I am NOT a government attorney but it is safe to assume that each jurisdiction has a different rule, law, statute, code, policy, and/or procedure for handling this type of transaction. However, sweeping statements without any lawful basis is irresponsible and the patent unlicensed practice of law.

It should be pointed out that Mr. Feinberg's work with BP Oil Spill was cut short when it was determined that BP was paying Mr. Feinberg's law firm \$1,250,000.00 per month (emphasis added) for labor and overhead costs. In 2010, Robert Dudley of the Center for Justice and Democracy sent a letter the CEO of BP, concerning "serious new issues raised about the lack of transparency and potential conflicts of interest related to the administration of the Gulf Coast Claims Facility." He was ultimately relieved of his duties as the BP Fund Administrator for an obvious conflict of interest. According to various sources, Mr. Feinberg had been telling victims he was their lawyer and he did not answer to BP.¹ This fact alone should exclude Mr. Feinberg from acting as Administrator.

Mr. Feinberg's shady conduct is not isolated to his affinity to Big Business. In fact, he has a history of questionable political motives. Specifically, Mr. Feinberg was appointed by President Obama to serve as the United States Special Master for TARP Executive Compensation. Mr. Feinberg expressly stated to various news organizations that he was serving the country *pro-bono* and was NOT being paid for his services as the Pay Czar. For example, *Forbes* reported in August 2009 (via *Reuters*), "Feinberg is receiving no compensation for his role" [as Pay Czar]. Fact check websites ultimately performed a Freedom of Information Act request that proved unequivocally that Mr. Feinberg was, in fact, paid an annual salary of \$120,830.00 from the United States government.² Mr. Feinberg's *modus operandi* is crystal clear. He will tell anyone that will listen that he is working *pro-bono* in exchange for favorable press and/or payments to his law firm.

Mr. Feinberg's indiscretions are plentiful in relation to his work as a lawyer and Fund Administrator. For example:

In regards to his role during the 9-11 tragedy: "Mr. Feinberg had to decide how much victims' families received after the 9/11 attacks[...] Attorney General John Ashcroft, a Republican, asked Mr. Feinberg to oversee an \$11 billion pot of taxpayer money to compensate the 9/11 families. The Department of Justice granted Mr. Feinberg "sweeping" powers, in the words of The New York Times that year, to help draft the fund's rules and procedures, oversee its operations and personally sign off on all the money handed out to claimants. Anyone seeking money had to waive their right to sue. [...] Mr. Feinberg, as special master, was bound by certain directives. For a family to receive the tax-free money, they had to waive their right to sue or appeal. The airline industry would be safe. He then devised a simple formula: determine the economic loss suffered as a result of the premature death, add on an estimate based on pain and suffering, and subtract from that number any collateral source of income, such as life insurance. The value of a life ranged from about \$250,000 to \$7 million."³

In regards to Mr. Feinberg's role as the Fund Administrator for the Virginia Tech Massacre, one claimant said, "They gave a rough idea, saying there was about \$7 million in the fund. In reality, Virginia Tech had taken in close to \$100 million dollars at that time. We were rushed to

¹ https://en.wikipedia.org/wiki/Kenneth_Feinberg

² <http://www.breitbart.com/big-government/2010/09/15/what-is-obama-s-pay-czar-s-pay/>

³ <http://observer.com/2016/03/meet-ken-feinberg-the-master-of-disasters/>

fill in a piece of paper and submit it back to them; the deadline was September 15, 2007. After the disbursement, we found out that the school took in more than \$100 million."⁴

Volkswagen certainly appreciate Mr. Feinberg's employ: "Volkswagen tapped Mr. Feinberg to administer an independent claims program for the owners of nearly 600,000 diesel vehicles that spewed up to 40 times the legally allowable emissions. Officials at VW admitted to the deception, adding a hurdle for Mr. Feinberg, who hopes to convince the plaintiffs' lawyers to avoid going to trial. Lawyers representing VW owners have already expressed skepticism over the company's retention of Mr. Feinberg, who could ultimately help the carmaker avoid the sort of class-action lawsuits that could cripple the company. Victims entering the claims program wouldn't be able to sue."⁵

The Sandy Hook victims were made to wait an exceptional amount of time to receive funds: "The tragic shootings at Sandy Hook, in Newtown, happened 122 days before the marathon bombings, and still the major fund collecting donations hadn't finalized a process for distributing the funds."⁶

Just like with Sandy Hook, the Aurora Shooting victims were forced to wait for necessary funds: "After Aurora, it took 259 days — almost a year — for the funds to make it to victims."⁷

Mr. Feinberg even got his hands dirty with the Agent Orange epidemic: "'Purely by accident,' in Mr. Feinberg's own words, he was chosen in 1984 to help mediate a class-action lawsuit brought by 250,000 Vietnam War veterans against Dow Chemical Company and six other manufacturers of Agent Orange, a poisonous defoliant the U.S. military used during the war. [...] Though the Agent Orange case had dragged on for more than eight years, Mr. Feinberg reached a \$180 million settlement between the manufacturers and its victims in just six weeks. It was well-paid work for the young attorney: he netted \$800,000, according to Time magazine. Mr. Feinberg's clients each received a nominal sum in the range of \$1,200."⁸

As stated above, Mr. Feinberg is presently sitting as the judge, the jury, and the executioner. Sir Ferdinand Dalberg-Acton once said "[P]ower tends to corrupt, and absolute power corrupts absolutely. Great men are almost always bad men." The foregoing information unquestionably implies that Kenneth Feinberg is a bad man. More specifically, Google the "misallocation of 9-11 funds" and take note of the nearly 20,000 hits. Mr. Feinberg is responsible for the mishandling of several billions of dollars in 9-11 donations – why would the Pulse Massacre be handled any different?

Just because one man has been selected to distribute the funds of many American tragedies but has been more of a ring master championing the interests of big business over the working class victims does NOT mean that he is the only person that should distribute funds related to any

⁴ http://www.collegiatetimes.com/news/virginia_tech/april-hokie-spirit-memorial-fund-remains-hot-button-issue/article_e8c2706d-4f00-5b4f-a8a7-d545a3e8a220.html

⁵ <http://observer.com/2016/03/meet-ken-feinberg-the-master-of-disasters/>

⁶ <http://nypost.com/2016/06/14/sandy-hook-victims-mom-urges-caution-as-fund-raising-surges-for-club-massacre/>

⁷ <https://hbr.org/2016/01/lessons-from-bostons-experiment-with-the-one-fund>

⁸ <http://observer.com/2016/03/meet-ken-feinberg-the-master-of-disasters/>

American tragedy. In fact, I would go as far as saying that Mr. Feinberg is exactly the type of person that should NOT be distributing the OneOrlando Fund monies. He proven over and over again that he CANNOT be trusted.

GENERAL OBJECTIONS

The mission of OneOrlando is to distribute donation funds in an open, transparent, and fair manner. After sitting through the early Town Hall meeting and watching of the late Town Hall meeting (via web-stream), it is difficult to see how this process is open, transparent, or fair – given the seemingly limitless discretion of Mr. Feinberg. Suppose that Mr. Feinberg would have presented himself in a kind manner, I might not be writing you this correspondence today because it is also my goal that the victims and victim’s family be paid quickly and efficiently.

In that regard, I am generally leery of any organization that makes broad, sweeping generalizations, such as “100% of the donations that are... (given) directly back to the victims’ families and the survivors.” If that assertion is true, then the following questions come to my mind right away:

1. Who paid for the Town Hall meeting?
2. How were the staff, security, and police paid for that worked at the Town Hall meeting?
3. Who paid for the multiple layers of metal detectors that we walked through to enter the Town Hall meeting?
4. Who paid for the water that was being given away to Town Hall attendees (I know it was not the Orlando Magic – Amway charges \$8/per at a Magic game)?
5. Who pays for postage and mailing of claim forms and distribution forms?
6. Who pays for web creation and web maintenance?
7. Who collects the interest on the \$23,000,000.00 that is presently sitting in the bank?
8. Are you sure that only \$23,000,000.00 has been donated so far?
9. Is Mr. Feinberg really working *pro-bono* (as he stated on various occasions throughout the Town Hall) or will he or his law firm and/or business associations and/or foundation receive compensation after completion of the OneOrlando Fund distribution?
10. Does Mr. Feinberg’s law firm and/or business associations and/or foundations benefit from his relationship with the OneOrlando Fund?
11. Who is the independent auditor? Do they have any affiliation with Mr. Feinberg’s law firm and/or business associations and/or foundations?
12. Was Mr. Feinberg fully vetted before he was chosen to act as Administrator?

I could go on, but I suspect that you see my point. Nothing about this process seems open, fair, or transparent. Mr. Feinberg is a man that has been discharged from similar obligations for patently lying to similarly situated victims and families. How are the Pulse Nightclub victims supposed to believe that this man is NOT lying to them? They can’t. They won’t.

REQUEST FOR FACE-TO-FACE MEETING WITH FUND ADMINISTRATOR

Finally, please allow this correspondence to serve as my client’s formal request for a “face-to-face personal meeting with the Fund Administrator(s)” as required by the “Draft Protocol”.

Please understand that I am happy to voice my objections to Mr. Feinberg personally. Notwithstanding, I am almost certain that he will be as non-responsive with me then that he was at the Town Hall meeting.

Stated succinctly, I would NOT let Kenneth Feinberg count the money in my wallet. I certainly do not want him distributing \$23,000,000.00 (or more) to Pulse victims. Mr. Feinberg has proven that he does NOT have the victim's best interest in mind. Providing this piranha with the unfettered discretion, without any checks and balances, is an unquestionable recipe for disaster. These poor people have lost enough already. Please be reminded that the mission statement of OneOrlando is the open, transparent, and fair distribution of donations to victims and victim's families. There is not a single thing about this process that is open, transparent, or fair.

PLEASE GOVERN YOURSELF ACCORDINGLY.

Thank you in advance for your attention to this important and urgent matter. Feel free to contact me directly if you have any questions or comments.

Respectfully,

Paul T. Zeniewicz, Esquire

**cc: Strengthen Orlando, Inc.
ATTN: Rebecca Sutton
400 South Orange Avenue
Orlando, Florida 32802**

**The National Center for Victims of Crime
2000 M Street Northwest; Suite 480
Washington, D.C. 20036**

**The Law Offices of Kenneth R. Feinberg, Esquire
The Willard Office Building
1455 Pennsylvania Avenue, NW
Washington, D.C. 20004-1008**

**Orlando Mayor Buddy Dyer
ATTN: Rebecca Sutton
400 South Orange Avenue
Orlando, Florida 32802**

Exhibit “C”



OneOrlando Fund

FINAL PROTOCOL

AUGUST 12, 2016

The Final Protocol has been approved by the OneOrlando Fund Board and incorporates feedback received from the community and the general public at two Town Hall meetings held on August 4, 2016 at the Amway Center in Orlando Florida, as well as comments received via email, written correspondence and telephone communication with the Fund Administrator, and feedback from the OneOrlando Fund Board, Equality Florida, and the National Center for Victims of Crime/National Compassion Fund.

The OneOrlando Fund was established through the generosity of businesses, foundations and individual donors. OneOrlando Fund will be used to assist those families of the victims who were killed, the victims who were physically injured and the victims who were physically present during the shootings inside the Pulse Nightclub in Orlando, Florida on June 12, 2016 (the "Pulse Nightclub Attack"). OneOrlando is a project within Strengthen Orlando, Inc., a 501 (c)(3) nonprofit organization, Federal Tax ID #27-1964941 and Florida Registration #CH32010. The National Compassion Fund is a project of the National Center for Victims of Crime, a 501(c)(3) nonprofit organization, Federal Tax ID #30-0022798 and Florida Registration #CH21962.

The payments from the Fund are to be apportioned to the victims in accordance with the severity of the injuries arising from the Pulse Nightclub Attack.¹

The Distribution classifications are outlined below:

PRIORITIZATION OF ELIGIBLE INDIVIDUAL CLAIMS

A. Individual Death Claims

Eligible claimants for deceased victims killed as a result of the Pulse Nightclub Attack will receive the highest category of payment under the scope of this Protocol.

B. Individual Physical Injury Claims for Victims Requiring Overnight Hospitalization

Eligible claimants who were physically injured and hospitalized (within 48 hours of the Pulse Nightclub Attack) for one or more nights between June 12, 2016 and September 12, 2016 (the last day to submit a claim to the Fund) due to physical injuries resulting from the Pulse Nightclub Attack will receive payment under this Final Protocol.

¹ Determination of the amounts for each eligible claimant will depend upon the following: 1) the balance in the OneOrlando Fund on September 26, 2016; 2) the receipt of updated data regarding the nature and the number of physical injuries, and the number of individuals physically present inside the Pulse Nightclub; 3) completion of the review of all submitted claims; and 4) review and approval by the Administrators.

C. Individual Physical Injury Claims of Victims Treated at Orlando Area Hospitals (or treated by a private physician) on an Emergency Out-Patient Basis

Eligible Claimants who were physically injured as a result of the Pulse Nightclub Attack who were treated on an emergency out-patient basis (within 48 hours of the Pulse Nightclub Attack) at one of the Orlando, Florida area hospitals, or treated by a private physician, and released without an overnight hospital stay, will receive a payment under this Final Protocol.

D. Individual Claims of Victims Present Inside the Pulse Nightclub

Eligible Claimants who were physically present inside the Pulse Nightclub at the time of the Attack, but did not suffer physical injury requiring medical treatment will receive a payment under this Final Protocol. Proof of such physical presence will be based upon law enforcement records.

PROCESS AND PROCEDURES

Eligible claimants must file either a Claim Form for Deceased Victims, a Claim Form for Physical Injury or a Claim Form for Physical Presence inside the Pulse Nightclub in order to be eligible to participate and receive a payment from the Fund. A single Claim Form should be submitted for each eligible claimant.

The process and procedures for consideration of eligible claims will be as follows:

A. The Fund will be administered by Kenneth R. Feinberg, the National Center for Victims of Crime/National Compassion Fund and the OneOrlando Fund Board.

B. A uniform Claim Form (one for a deceased victim, one for a physically injured victim and one for physical presence inside the Pulse Nightclub) and Final Protocol, in English and in Spanish, (will be provided to all known claimants and potential claimants by US mail and/or email. The Final Protocol and Claim Forms will also be available for download via OneOrlando.org and NationalCompassionFund.org beginning on August 12, 2016. Copies may also be requested by emailing the Fund Administrators. Only one Claim Form should be submitted by or on behalf of each victim. The Claim Form should be completed and submitted to the Fund Administrators (along with all required supporting documentation) postmarked no later than September 12, 2016. Requests for copies of the Claim Forms and questions regarding the completion of the Claim Form should be sent via email to OneOrlando@ncvc.org or by telephone to (855) 4VICTIM (855 484-2846).

C. Claim Forms should be mailed or sent via overnight courier to:

OneOrlando Fund
c/o National Center for Victims of Crime
2000 M Street, NW, Suite 480
Washington, DC 20036

D. Individual claimants may request a face-to-face personal meeting (or telephonic meeting) with the Fund Administrators before the final processing of all claims is completed. These meetings will be scheduled before the individual claim is processed but will not serve to alter the Final Protocol or any allocation set forth in the Final Protocol. Requests to meet with the Fund Administrators should be sent by email to the Fund Administrators at OneOrlando@ncvc.org or by telephone to (855) 4VICTIM (855 484-2846).

E. In the event that a claimant submits an incomplete or deficient claim, *e.g.*, the claimant failed to include required documentation or failed to sign the Claim Form, a representative from the Fund Administrators' office will work with the claimant in an effort to cure any such deficiencies.

F. Payments will be issued immediately following the rendering of a final review and determination of all eligible claims by the Fund Administrators. The Fund Administrators will submit final payment determinations to the Chairman of the OneOrlando Fund Board for transmission of the payments, by check or electronic bank wire, to each eligible claimant. Payments will be made by electronic funds transfer or by check sent to claimants via courier service.

G. A Claim Form filed for a deceased victim will require the spouse's signature if the deceased individual was married at the time of death. In cases where the victim was not married, the personal representative legally authorized to administer the estate must sign the Claim Form. The Personal Representative must prepare a proposed plan of distribution of the funds among the decedent's legal heirs and beneficiaries. The proposed plan will be distributed to all such legal heirs and beneficiaries, each of whom must consent to the proposed distribution by signing a consent form. If agreement among the heirs and beneficiaries cannot be reached as to who will serve as the Personal Representative, or with regard to the proposed distribution, the claimant(s) will be required to obtain legal authorization from the Probate Court to determine who is the legally responsible person eligible to file the claim. Under those circumstances, the Administrator will recommend that the OneOrlando Fund deposit the affected funds with the Probate Court, to be held in a separate account and to be distributed only upon resolution of accordance with a valid court order.

H. For claims for a minor child, the Claim Form will require the signature of both parents (if both parents are living). For claims for incompetent adults, the Claim Form will require proof of representative capacity, such as a power of attorney, guardianship, appointment of guardian or attorney ad litem.

I. A Claim Form filed for a physical injury claimant must include a hospital record which confirms: i) date of admission to the hospital, ii) date of discharge from the hospital, and iii) the nature of the injury and that the injury was sustained as a result of the Pulse Nightclub Attack.

J. A Claim Form filed for physical presence inside the Pulse Nightclub must be corroborated by confirmation by law enforcement records.

K. The OneOrlando Fund cannot provide tax advice to those receiving payments from the Fund. The Fund Administrators recommend you consult your tax advisor for any questions regarding tax liability for these payments.

L. A full audit of the OneOrlando Fund will be conducted by an independent auditing firm as soon as possible after October 15, 2016. The results of this audit will be made available to all claimants, donors and the general public along with a Final Report from the Fund Administrators.

OUTREACH

A. Two public meetings were conducted by the Fund Administrators on August 4, 2016 at the Amway Center in Orlando, Florida (400 West Church Street, Suite 200, Orlando, FL 32801) to explain the contents of the draft Protocol and the claim submission process and to invite input and comments from potential claimants and the general public. Information collected from these group meetings and various communications and correspondence between the claimants and other interested parties and the Fund Administrators were considered in finalizing the Final Protocol.

B. The Final Protocol and the Claim Forms will be disseminated to all known and registered victims and made available on the OneOrlando.org website and the NationalCompassionFund.org website beginning on August 12, 2016. Email requests for copies of the final documents should be made to OneOrlando@ncvc.org. **The deadline for submission of the Claim Form is September 12, 2016.** The Fund Administrators will work directly with all claimants as requested to make sure that all claims are submitted by the September 12 deadline.

C. Optional face-to-face meetings with the Fund Administrator will be scheduled at the claimant's request. All claims will be processed during the period between September 12 and September 26, 2016. All claimants requesting face-to-face meetings with the Fund Administrators before the claim is processed will be afforded such a meeting during the period between September 12 and September 25, 2016. Meetings will be scheduled at mutually convenient times and locations. In lieu of a face-to-face meeting, the claimant may request a telephonic meeting. To request a meeting, please send your request via email to OneOrlando@ncvc.org or by telephone at (855) 4VICTIM (855 484-2846).

Victims of family members in need of services can receive assistance through the Orlando United Assistance Center. Appointments can be scheduled by calling (407) 500-HOPE (407-500-4673) or by visiting cityoforlando.net/hope.

TIMELINE

- August 4, 2016: Two Town Hall meetings at 12:30 p.m. and 6:30 p.m. conducted by the Fund Administrators in Orlando, Florida, each lasting for 90 minutes.
- August 12, 2016: The Final Protocol and Claim Forms disseminated to all known claimants and potential claimants who registered through the Fund website. These documents will be made available on the Fund website for families and all interested parties.
- August 12 – September 12, 2016: Claim Forms completed and submitted to the Fund Administrators along with the required documentation.
- September 12, 2016: Deadline for submission of Claim Forms.
- September 12 – September 25, 2016: All personal meetings requested with the Fund Administrators completed.
- September 12 – September 26, 2016: All claims reviewed by the Fund Administrators and recommendations for payments to eligible claimants submitted to the OneOrlando Fund Board for independent review and approval.
- September 27, 2016: Payment Distribution to approved eligible claimants begins on a rolling basis.
- After October 15, 2016: Independent Audit begins.

Exhibit “D”

THE LAW OFFICES OF
KENNETH R. FEINBERG PC

THE WILLARD OFFICE BUILDING
1455 PENNSYLVANIA AVENUE, N.W.
SUITE 390
WASHINGTON, D.C. 20004-1008

(202) 371-1110 (TELEPHONE)
(202) 962-9290 (FAX)

WRITER'S DIRECT DIAL NUMBER
202-962-9280
kfeinberg@feinberglawoffices.com

August 26, 2016

Paul T. Zeniewicz, Esq.
Cohen Grossman
Attorneys at Law
350 North Lake Destiny Road
Maitland, FL 32751

RE: OneOrlando Fund: Jillian Amador and [REDACTED]

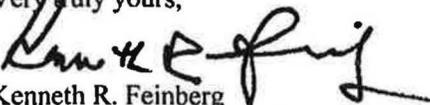
Dear Mr. Zeniewicz:

I am in receipt of your August 8, 2016 letter in which you state that your firm represents the above-captioned two individuals. In your letter you state that, "this correspondence shall serve as my clients formal request for a 'face-to-face personal meeting with the Fund Administrator' at your earliest convenience."

To date, we have not received Claim Form Applications for either of the above-referenced claimants. Upon receipt and confirmation by the Claimants of your representation, I would be pleased to schedule such a meeting either in person in my Washington, DC office, by live videoconference or by telephone conference call.

Please advise as to proposed convenient times.

Very truly yours,


Kenneth R. Feinberg
OneOrlando Fund Administrator

KRF:shs

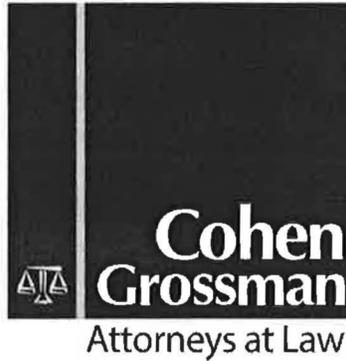
cc: Ms. Camille S. Biros

Strengthen Orlando, Inc.
Attn: Ms. Rebecca Sutton
400 South Orange Avenue
Orlando, FL 32802

The National Center for Victims of Crime
2000 M. Street, NW, Suite 480
Washington, DC 20036

Orlando Mayor Buddy Dyer
Attn: Ms. Rebecca Sutton
400 South Orange Avenue
Orlando, FL 32802

Exhibit “E”



August 30, 2016

The Law Offices of Kenneth R. Feinberg PC
The Willard Office Building
1455 Pennsylvania Avenue, N.W.; Suite 390
Washington, D.C. 20004-1008

Re: Pulse Nightclub Shooting
My Client: Jillian Amador

Mr. Feinberg,

The following letter is to confirm our phone call this evening and is also in response to your letter dated August 26, 2016 (which was delivered yesterday to my office via FedEx on August 29, 2016). As I stated over the phone, my office no longer represents Mr. Angel Mendez; accordingly, this correspondence is solely in relation to my firm's relationship with Ms. Jillian Amador.

I sincerely appreciate the time that you spent with me on the phone this evening and our time in the future. As I stated over the phone, Ms. Amador and I are available to be in DC on September 2nd or 7th. Obviously, I recognize the time and expense that would be saved via a meeting via video and/or teleconference. Notwithstanding, said video and/or teleconference shall NOT constitute a waiver and/or release of my client's "face-to-face" rights and/or any other rights and/or benefits related to the Final Protocol. My assistant, Stephanie Sanchez, will contact you tomorrow to arrange any agreeable time for my client and myself in the coming days.

Moreover, I respectfully request that you confirm in writing that you, as Fund Administrator, have decided to perform (and disseminate) an independent audit, **prior to disbursement of any OneOrlando funds**. Second, please confirm in writing that \$27 Million Dollars is the amount this is presently being held by OneOrlando (and/or its affiliates) to be distributed to Pulse victims and/or the family of victims.

I do not mean to sound facetious, here, but I have sincere and honest reservations about the unfettered and endless power granted to *you* by the City of Orlando, the OneOrlando Fund,

Strengthen Orlando Inc., the National Center for the Victims of Crime, the National Center for the Victims of Crime, the National Compassion Fund, Equality Florida, GLBT Community Center of Central Florida, OnePulse, and/or various other local and national businesses and organizations that may or may not be affiliated with the present distribution of funds to Pulse victims and the family of victims.

As you notated over the phone, my team has done its “homework” on your history and the many moving parts involved with the Pulse donations. Candidly, my research supports a conclusion that substantially more than \$27 Million dollars has already been collected by OneOrlando and its affiliates. I also have legitimate concerns about OneOrlando’s failure to contemplate “mental” and/or “psychological” injuries within the Final Protocol, when at least fifty (50) people walked out of Pulse (though their loved ones might not have). Finally, I am skeptical of any propositions that you make given your express comment at the Town Hall that “we will NOT change the protocol once the protocol is final.” **These are your words, not mine.**

Mr. Feinberg, I may have been born at night, but I was NOT born last night. Given the amount of money that has been donated by generous people from all around the world – to my City Beautiful – it is far more important my client (and me) that YOU distribute this money properly than it is for YOU to distribute it quickly. I look forward to speaking with you.

Respectfully,

/s/

Paul T. Zeniewicz, Esquire

**cc: OneOrlando Fund
c/o Nation Center for Victims of Crime
2000 M Street, NW; Suite 480
Washington, D.C. 20036**

**Strengthen Orlando, Inc.
ATTN: Rebecca Sutton
400 South Orange Avenue
Orlando, Florida 32802**

**The National Center for Victims of Crime
2000 M Street Northwest; Suite 480
Washington, D.C. 20036**

**Orlando Mayor Buddy Dyer
ATTN: Rebecca Sutton
400 South Orange Avenue
Orlando, Florida 32802**

Exhibit “F”



Process & Transparency

Process and Transparency

Independent Accountant's Reports on Applying Agreed-Upon Procedures (Audit)

- National Center for Victims of Crime and Ken Feinberg's Office (PDF)
- Equality Florida Institute, Inc. and Equality Florida Action, Inc. (PDF)
- OneOrlando Fund (PDF)
- GLBT Community Center (PDF)

Distribution Protocol

The Final Distribution Protocol, which will govern the OneOrlando Fund, has been developed by the Administrators, incorporating feedback from the OneOrlando Board, Equality Florida, the National Center for Victims of Crime/National Compassion Fund, the Orlando Community and the general public, including those present at the Town Hall meetings held by the Administrators on August 4, 2016.

Final Distribution Protocol

- English Version (PDF)
- Spanish Version (PDF)

Draft Distribution Protocol

- English Version (PDF)
- Spanish Version (PDF)

Town Hall Meetings

Two town hall meetings have been conducted by the Fund Administrators on August 4, 2016 at the Arway Center in Orlando, FL to explain the contents of the draft Protocol and the claim submission process and to invite input and comments from potential claimants and the general public. Information collected from these group meetings and various communications and correspondence between the claimants and other interested parties and the Fund Administrators was considered in finalizing the Final Protocol.

GET UPDATES

Email Address

RECENT NEWS

OneOrlando Fund Claims Update
September 19, 2016

Important Notice To Claimants
September 19, 2016

IMPORTANT NOTICE TO CLAIMANTS FROM THE FUND ADMINISTRATOR: September 1, 2016

Claim Form Assistance Available August 18, 2016

OneOrlando Fund Claim Forms Now Available for Pulse Victims: August 12, 2016

Exhibit “G”



INDEPENDENT ACCOUNTANT'S REPORT
ON APPLYING AGREED-UPON PROCEDURES

National Center for Victims of Crime and Ken Feinberg's Office

We have performed the procedures enumerated below, which were agreed to by National Center for Victims of Crime and Ken Feinberg's office, solely to assist you with respect to the accounting records of National Center for Victims of Crime (NCVC) for the period from June 14, 2016 through August 31, 2016 as they relate to the contributions and expenses designated for the "National Compassion Fund-Orlando" for the benefit of the victims of the Pulse nightclub attack. NCVC's management is responsible for the organization's accounting records. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of NCVC and Ken Feinberg's office. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings are as follows:

- 1) We obtained the general ledger detail of NCVC's account # [REDACTED] Restricted Donations, department #50 Victims Services, program #506 Orlando, Grant #1000 General "designated for National Compassion Fund-Orlando donations" for the period from June 14, 2016 to August 31, 2016. We compared the total contributions recorded in this general ledger account to the deposits on the Eagle Bank statements for the account segregated specifically for the National Compassion Fund and noted the following:
 - a. Contributions recorded in NCVC's account # [REDACTED] for the period from June 14, 2016 to August 31, 2016 totaled \$955,119.60.
 - b. Deposits made into the Eagle Bank account segregated specifically for the National Compassion Fund for the same period totaled \$957,271.41.
 - c. We inquired of management of NCVC regarding the difference of \$2,151.81. Per the organization's outside accountant, the Eagle Bank account included \$2,047.50 of deposits related to other causes. These deposits are excluded from the general ledger account for National Compassion Fund-Orlando. The remaining difference is \$104.31.
- 2) We examined the Eagle Bank statements for June, July and August 2016 and noted the following withdrawals made from the account.
 - a. 6/17/2016 – preauthorized withdrawal of \$0.22. Per inquiry of management, this was a test transaction from the donation website and that went in and out of the account.
 - b. 7/12/2016 – bank service charge of \$35. This fee was not recorded as an expense against Orlando donations and was coded to administrative code #10-130-1000.
 - c. 7/13/2016 – Transfer of funds in the amount of \$25,000 for a check deposited into the incorrect account. Per inquiry of management, this transaction came into the Eagle Bank account and was subsequently transferred out and had no effect on the accounting Orlando donations.
 - d. 8/12/2016 – refund of a contribution to the donor in the amount of \$33,010.48. Per inquiry of management, this was a mistake made by the donation website representing an unsuccessful credit card transaction deposited in July and reversed in August by the donation website.

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We are not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of National Center for Victims of Crime and Ken Feinberg's office and is not intended to be and should not be used by anyone other than those specified parties.

Wegner CPAs LLP

Wegner CPAs
Alexandria, Virginia
September 20, 2016



Mayer Hoffman McCann P.C.
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Independent Accountant's Report
on Applying Agreed-Upon Procedures

Equality Florida Institute, Inc. and Equality
Florida Action, Inc.

We have performed the procedures enumerated below, which were agreed to by Equality Florida Institute, Inc., Equality Florida Action, Inc. and Ken Feinberg's Office (the specified parties), solely to assist you with respect to the accounting records and activity of the Pulse Victim Fund of Equality Florida Institute, Inc. and Equality Florida Action, Inc. (collectively the "Organizations") for the period from June 12, 2016 through September 2, 2016. Management of the Organizations is responsible for the Organizations' accounting records. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings are as described in the attached schedule.

We were not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of Equality Florida Institute, Inc., Equality Florida Action, Inc. and Ken Feinberg's Office and is not intended to be and should not be used by anyone other than those specified parties.

MAYER HOFFMAN MCCANN P.C.

September 20, 2016
Clearwater, Florida



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**EQUALITY FLORIDA INSTITUTE, INC. AND
EQUALITY FLORIDA ACTION, INC.**

Schedule of Procedures and Results – Pulse Victim Fund

Period from June 12, 2016 through September 2, 2016

1. We compared the total contributions reflected in the donor database for the Pulse Victim Fund with the amounts recorded in the general ledger of Equality Florida Institute, Inc. (account number 4010) and the general ledger of Equality Florida Action, Inc. (account number 4010) (combined total contributions of \$8,910,349.91) for the period from June 12, 2016 through September 2, 2016 and noted that the amounts reconciled without exception.

Our procedures did not result in any findings or exceptions.

2. We compared the total contributions reflected in the donor database for the Pulse Victim Fund with related bank deposits for the period from June 12, 2016 through September 2, 2016.

Our procedures did not result in any findings or exceptions.

3. We reviewed supporting documentation for all disbursements from the Pulse Victim Fund which were recorded as debits in Equality Florida Institute, Inc. general ledger account number 2170 for the period from June 12, 2016 through September 2, 2016. None of the disbursements reviewed were for administrative purposes. The nature of the disbursements reviewed were as follows:

Date	Description	Amount
June 24, 2016	Reimburse emergency costs/funeral costs	\$342.78
June 29, 2016	Reimburse emergency costs/funeral costs	\$434.00
July 1, 2016	Gift cards distributed by Orlando Health to 16 hospitalized victims upon discharge (16 @ \$250 each)	\$4,000.00
July 26, 2016	Reimburse emergency costs/funeral costs	\$788.99
	Total disbursements	\$5,565.77

INDEPENDENT ACCOUNTANTS' REPORT

Strengthen Orlando, Inc.
d/b/a OneOrlando Fund

We have examined the receipts and disbursements of funds in the account held at Bank of America designated for Strengthen Orlando, Inc. d/b/a OneOrlando Fund (the "Fund"), for the period June 13, 2016 through September 15, 2016, summarized below. The Fund's management is responsible for recording the receipts and disbursements of the Fund. Our responsibility is to express an opinion on the receipts and disbursements of the Fund summarized below based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the receipts and disbursements enumerated below have been recorded in the bank account held at Bank of America designated for the Fund, in all material respects. An examination involves performing procedures to obtain evidence about the receipts and disbursements of the Fund. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the receipts and disbursements, whether due to fraud or error. We believe that our examination provides a reasonable basis for our opinion.

The receipts and disbursements of funds in the account held at Bank of America designated for the Fund are described below:

- The bank balance available for distribution at September 15, 2016: \$16,796,446
- Total receipts to the bank account from June 12, 2016 through September 15, 2016: \$16,828,869
- Total disbursements from the bank account from June 13, 2016 through September 15, 2016: \$32,423
- Disbursements from the bank account consist only of \$32,423 in merchant fees charged by Bank of America and American Express related to the cost of processing credit card donations. Bank of America and American Express contributed \$27,422 of these fees back to the Fund.
- No disbursements were made to any families or victims of the Pulse tragedy as of September 15, 2016.

In our opinion, the activity described above presents, in all material respects, the receipts and disbursements of funds in the account held at Bank of America designated for the Fund for the period June 13, 2016 through September 15, 2016.

WithumSmith+Brown, PC

September 19, 2016

CARTER & COMPANY

Certified Public Accountants, LLC

543 Harbor Blvd.
Suite 201
Destin, Florida 32541
Phone: 850-650-0125
Fax: 850-650-0126

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

We have performed the procedures enumerated below, which we agreed to by GLBT Community Center of Central FL, Inc. and Ken Feinberg's office, solely to assist you with respect to the accounting records of GLBT Community Center of Central FL, Inc. for the period from June 12, 2016 through September 7, 2016, as they relate to the contributions and expenses designated for the "Pulse Tragedy" for the benefit of the victims of the Pulse nightclub attack.

GLBT Community Center of Central FL, Inc.'s management is responsible for the company's accounting records. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of GLBT Community Center of Central FL, Inc. and Ken Feinberg's office. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings are as follows:

- 1) We have obtained the general ledger detail of GLBT Community Center of Central FL, Inc.'s accounts for the "Pulse Tragedy" contributions for the period from June 12, 2016 through September 7, 2016. The total contribution recorded in the general ledger was \$715,130.13.
- 2) We have examined the First Green Bank statements, Pay Pal accounts, Go Fund Me accounts, and Square accounts for June, July, August and partial September and noted that deposits and wire transfers totaling \$715,130.13 were made during the period from June 12, 2016 through September 7, 2016. We did not see any withdrawals from these accounts during the same period for any administrative expenses or direct payments to victims.

We are not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of GLBT Community Center of Central FL, Inc. and Ken Feinberg's office and is not intended to be and should not be used by anyone other than these specified parties.

Carter & Company

Destin, Florida
September 7, 2016