

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

RONY SHAMUEL a/k/a)
RONNIE SHAMUEL,)
))
Plaintiff,)
))
v.)
))
CHRISTOPHER JURICA, JAY)
JURICA, and FIRE CLEAN PLUS, INC.,)
))
Defendants.)
_____)

Case No. 2014 CH 10751
Consolidated with 2014 M1 717314
Honorable Neil H. Cohen

RECEIVER’S FINAL STATUS REPORT AND PROPOSED DISTRIBUTION PLAN

NOW COMES James E. Sullivan, as the Receiver (“Receiver”) for Fire Clean LLC and Fireclean Plus Inc, (the “Fireclean Entities”) by and through his attorneys Gardiner Koch Weisberg & Wrona (“GKWW”), and pursuant to the powers vested in him by the Order of this Court, now respectfully submits this Final Status Report and Proposed Distribution Plan, and in support thereof, states as follows:

I. BACKGROUND GENERALLY

1. On or around August of 2004, the Plaintiff, Ronnie Samuel (“Ronnie”), and the Defendants, Christopher Jurica (“Chris”) and Jay Jurica (“Jay”), established Fire Clean LLC, an insurance disaster restoration business. Each of the parties contributed \$25,000.00 in capital when the business was initiated.

2. On or around March 20, 2014, another insurance disaster restoration business entity by the name of Fireclean Plus, Inc. was apparently formed by Chris and Jay Jurica.

3. On June 26, 2014, Plaintiff filed a verified complaint which asserted causes of action based on breach of contract and an accounting. The Plaintiff also filed an emergency motion for temporary restraining order and preliminary injunction.

4. Pursuant to the Court's order of July 8, 2014, appointing the undersigned as Receiver over Fire Clean LLC and FireClean Plus Inc., the undersigned commenced his duties in acting as Receiver over the entities. The Receiver thereafter retained Gardiner Koch Weisberg & Wrona as counsel.

5. The Order appointing the Receiver directed the Receiver to, *inter alia*, take control of Fireclean's business operations, funds, assets and property, and if feasible run the business.

6. Due to limited operating capital and excessive liabilities, the Receiver and his counsel quickly realized that operating the business on an ongoing basis would not be possible.

7. In addition to the Receiver's own review and analysis of the corporate records, the accounting firm of BDO conducted a review of the FireClean Entities' financial records and general files, including but not limited to its QuickBooks Records, bank statements, customer files, and tax documents. Both BDO's report and the Executive Summary that it prepared were attached to the Receiver's initial report.

8. In short, the BDO report concluded that the FireClean Entities were not financially sustainable, stating "from an accounting perspective, Fire Clean does not have the ability to continue as a going concern. That is, the company does not have the resources or liquidity to operate as a continuing business."

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9. As a result, with the assistance of the parties, the Receiver and his counsel worked to wind up the business and collect as many assets as possible in order to maximize the funds available for distribution to eligible claimants.

10. The Receiver has used reasonable efforts in connection with the analysis and management of the property interests of the FireClean Entities. In furtherance of such, the Receiver and his counsel determined that there was personal property located in located in two principal locations: the Fire Clean LLC warehouse in Elk Grove Village, and the FireClean Plus, Inc. warehouse in Joliet.

11. Auctions were held to sell any property belonging to the FireClean Entities and \$58,893.59 was recovered as a result of those sales. The Receiver and his counsel also facilitated the return of various customer items which were being stored by the FireClean Entities in the two warehouses.

12. The Receiver and his counsel also pursued recovery from various entities where it was believed that one of the FireClean Entities was owed funds. For example, the Receiver pursued a claim against the insurance company for Metropolitan Oasis Community Development Center, a facility where FireClean employees performed restoration work in Indiana. The Receiver's right to the insurance proceeds was contested by Bayview Loan Servicing, but ultimately a settlement was reached which involved the Receiver recovering \$139,487.58 for the receivership estate.

13. Likewise the Receiver and his counsel were involved in contentious litigation with the Drake Oak Brook for several years in both Cook County and Dupage County. Ultimately, the Receiver and the drake settled on the day of trial. The Drake paid \$85,000 to the

FireClean Entities and \$45,000.00 to Dryco LLC, the company suing FireClean due to nonpayment.

14. The Receiver and his counsel have used due diligence in attempting to determine the identity of all creditors of the FireClean Entities, including vendors, customers, financial institutions, and subcontractors.

III. BANKING AND FINANCE

A. Assets

15. Cash Receipts – from the period of July 8, 2014 until the date of this filing, the Receiver has collected \$306,700.19, itemized as follows:

<u>Date</u>	<u>Payor</u>	<u>Memo</u>	<u>Amount</u>
7/11/2014	Mages & Price, Attorneys at law	Valerie Falstad	\$683.72
8/3/2014	Linda and William Callahan	489 Winsor, Antioch, IL	\$826.96
8/3/2014	Mages & Price, Attorneys at law	Gerald Booz	\$408.00
8/6/2014	Mages & Price, Attorneys at law	Lien for 5931 S. Austin, Chicago	\$10,271.00
10/9/2014	S.C. Anderson Group International, Inc.	(Extended Stay)	\$989.93
10/31/2014	JAS Insurance Services	overpayment	\$336.70
12/31/2014	The Private Bank/CIBC	Interest Credit for all of 2014	\$2.40
2/13/2015	Allstate	Bernice Wright fire loss on 6/8/14	\$3,693.70
2/13/2015	The X Factor Auctions & Appraisals	All lots except 120 and 122	\$36,817.44
4/3/2015	The X Factor Auctions & Appraisals	Lot 122	\$6,970.00
4/3/2015	SPEC Athletic	RE 1401 State St	\$765.00
4/7/2015	Village of Itasca	Invoice No. 21222, Bay Park Fire repair Board	\$250.00
4/8/2015	Obenauf Auction Service, Inc.	Auction # 228, 231, 234, 235, 242, 243, 245, 250, 251, 266	\$9,561.52
4/20/2015	Toyota Motor Corp.	Claim No. TMUA1-	\$18.22

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	Litigation	17586274-5-DV	
4/24/2015	Linda and William Callahan	489 Winsor, Antioch, IL	\$100.00
5/21/2015	Linda and William Callahan	489 Winsor, Antioch, IL	\$100.00
6/17/2015	Obenauf Auction Service, Inc.	Proceeds from Receiver's auction of inventory - Auction 408	\$460.63
7/7/2015	Linda and William Callahan	489 Winsor, Antioch, IL	\$100.00
8/18/2015	The Hanover Insurance Group	Ressured from check dates 6/25/14 never cashed; Invoice Number 1000037357-8912	\$72.40
12/26/2015	The X Factor Auctions & Appraisals	Proceeds from Receiver's auction of inventory	\$5,084.00
12/31/2015	The Private Bank/CIBC	Interest Credit for all of 2015	\$49.99
1/18/2016	Nancy Swistowicz	Fire Restoration from fire 4/2014	\$1,907.00
6/23/2016	Liberty Mutual Insurance Company	Proceeds from settlement of claim regarding Metropolitan Oasis	\$139,487.58
12/31/2016	The Private Bank	Interest Credit for all of 2016	\$257.27
4/18/2017	Jay, Chris, Jacqueline Jurica	Proceeds from settlement re auction of additional items	\$1,000.00
11/13/2017	James P. Nagle	Proceeds from settlement of case against Drake Oak Brook	\$85,000.00
12/31/2017	The Private Bank/CIBC	Interest Credit for all of 2016	\$435.15
4/21/2018	BMO Harris	Transfer of previous balance in accounts	\$880.44
4/30/2018	The Private Bank/CIBC	Interest Credit for Jan.- April 2018	\$171.14

Total: \$306,700.19

16. As noted, the Receiver previously conducted an inventory of Fire Clean property, and all vehicles and/or equipment determined to be owned by the FireClean Entities was sold through the auctions noted above and the proceeds are included in the figure noted.

17. The Receiver decided not to pursue certain potential claims such as that involving the Bristol Court matter after evaluating the potential costs involved with same and after conducting an analysis regarding the likelihood of recovery on the merits of said claims.

B. Expenditures

18. From the date of the Receiver’s appointment on July 8, 2014 until present, the following disbursements have been made from the Receivership accounts for receivership operations/expenditures, with said disbursements being made either pursuant to court direction or the powers outlined in the July 8, 2014 order appoint the Receiver. Additional documentation regarding any of said expenditures can be provided upon request.

<u>Date</u>	<u>Payee</u>	<u>Memo</u>	<u>Amount</u>
12/14/2014	BDO	Invoice #455974	(\$5,000.00)
1/7/2015	Ford Motor Credit	Acct. # 48063000000044196651	(\$1,336.81)
12/6/2016	Xact Data Discovery	court reporter/dep transcript	(\$1,044.74)
12/15/2016	Business Record Services	Record storage fees	(\$35.00)
12/15/2016	Urbanksi Reporting Company, Inc.	court reporter/dep transcript	(\$520.00)
5/15/2017	BDO	Accountant fees	(\$5,184.25)
5/15/2017	Business Record Services	Record storage fees	(\$35.00)
8/9/2017	Business Record Services	Record storage fees	(\$315.00)
11/22/2017	Business Record Services	Record storage fees	(\$66.08)
12/12/2017	James B. Koch, Esq.	Attorney fees and expenses for Drake and General maters for 7/8/14-12/8/17	(\$30,000.00)
12/12/2017	GKWW	Attorney fees and expenses for Drake and General maters for 7/8/14-12/8/17	(\$30,000.00)
1/11/2018	Law Office of James E. Sullivan	Attorney fees and expenses for Drake and General maters for 7/8/14-12/8/17	(\$25,000.00)
1/16/2018	West Court Reporting & Video Services	court reporter	(\$825.50)
1/17/2018	Esquire Deposition	court reporter	(\$1,089.70)

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	Solutions LLC		
2/23/2018	Royal Court Reporting	court reporter for Drake trial	(\$85.00)
5/21/2018	GKWW	Future expected fees/expenses	(\$2,600.00)
5/21/2018	GKWW	Fees and expense for 12/4/17-5/1/17	(\$2,628.00)
5/21/2018	BDO	invoice # 00944776	(\$3,000.00)
6/1/2018* Not yet paid	Business Record Services	Estimated storage fees to store boxes from Sept.2017 through June 2020	(\$1,190.00)

TOTAL: \$109,955.08

C. Claims and Creditors Against the Receivership Estate

19. Based on the above-listed figures, the Receiver and his counsel have determined that there is presently **\$196,745.11** available for distribution to eligible claimants, though that amount should increase slightly due to interest being accrued in the coming weeks.

20. The Receiver also notes that said amount, and thus the precise amounts that will be distributed, are subject to change based on a variety of possible factors, including but not limited to: 1) the possibility that future attorneys fees/costs will be incurred for time exceeding that previously allotted for; 2) the fact that interest will continue to accrue until distribution is made, thereby increasing the amount available for distribution; 3) the possibility that some or all of the amounts suggested herein will be contested by claimants and/or modified by the Court; and 4) the possibility that additional funds will be received in relation to any outstanding receivables.

21. As noted, the Receiver and his counsel previously exercised due diligence in attempting to identify any and all potential creditors of FireClean LLC and/or FireClean Plus Inc. Ultimately, the Receiver prepared a list of 208 different persons or entities who may have a basis to make a claim against one of the FireClean Entities for money owed. See list of persons/entities attached hereto as Exhibit A.

22. On June 19, 2015, The Receiver filed a Motion to Establish Claims Process with the Court. A copy of said motion is attached hereto as Exhibit B.

23. On July 20, 2015, this Court entered an order granting said motion and approving the claims process proposed. (See copy of Order attached hereto as Exhibit C).

24. The Receiver's counsel thereafter mailed copies of the approved claim form and letter to all persons/entities listed on the attached Exhibit A. (See Certification of Mailing attached hereto as Exhibit D).

25. The notice sent to claimants included a deadline of September 1, 2015 for submission of the claim forms.

26. Untimely, the Receiver received Claim Verification Forms from 43 different people or entities.

27. The Claim Verification Form and accompanying instruction form indicated that all claimants were to fill out the form indicating how much money they believed they were owed from the FireClean Entities, and the claimants were directed to include with the submission any documents supporting said claim.

28. As outlined below, the 43 claimants submitted claims totaling \$1,050,091.36. The Receiver notes that said total only represents the sum of claims for entities who submitted a proper Claim Verification Form. For other entities that failed to submit said form despite receiving same, the Receiver has not included them in this analysis and is recommending that this Court order that the debt be discharged as to any entity who has failed to submit a Claim Verification Form.

29. The Receiver reviewed all documents submitted with the claim forms, and as set forth below, is recommending both that certain reductions be made for inadequate documentation, etc.

30. Thus, in general, the Receiver used the following criteria to determine distribution eligibility:

- Claimants who failed to submit a claim verification form were not given any consideration as to potential distribution;
- Claimants who failed to provide documentation for all amounts claimed in their respective claim verification form were denied or partially denied to the extent of the deficiency in the documentation provided;
- Claims factoring-in unjustified lien charges or penalties were reduced to the extent of such costs claimed;
- Unsecured claimants were treated alike, regardless of status as a customer, vendor, etc.

31. As the below proposed distribution reflects, the Receiver and his counsel are recommending that the only secured creditor, PNC Bank, receive not the full amount sought by them, but instead 50% of that amount.

32. Additionally, the Receiver is recommending that the remaining claimants each share the remaining funds on a *pro-rata* basis. The calculations for that result in the claimants other than PNC receiving 17.8851% of the amount sought after the Receiver's suggested reductions.

33. For all of the claimants, the Receiver recommends distribution of the amounts set forth in Column G below, as set forth in the following table:

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A. Claimant	B. Amount sought	C. Category of claimant	D. Notes regarding claim	E. Suggested reductions and basis for same	F. Updated Amts after suggested reductions	G. Amt suggested for payoff
Advanced Heating & Air	\$1,500.00	Subcontractor	Balance of fees for HVAC work completed at 11616 S. Alpine Ave., Palos Park		\$1,500.00	\$268.28
Beltrami, Lisa	\$2,500.00	Customer	2500 deposit paid for additional work but customer claims work wasn't completed		\$2,500.00	\$447.13
Berkley Net	\$2,929.00	General business charges	Workers Comp insurance premiums		\$2,929.00	\$523.85
Booz, Jerry	\$1,250.00	Customer	Customer claims FC overcharged and didn't provide written estimate	Amount adjusted to \$0. No documents supporting claim that work only worth \$1,500. FC file indicates that customer received \$5k from insurance company but retained the balance himself	\$0.00	\$0.00
ComEd	\$1,157.78	General business charges	Electrical service at Touhy Ave since 2013		\$1,157.78	\$207.07
Country Mutual Insurance Company	\$14,141.68	Customer/ Insurance Company	Overpayment for Vicki Veltum matter		\$14,141.48	\$2,529.22
Current Incident Notification Services	\$75.00	General business charges	Incident notification services - quarterly subscription		\$ 75.00	\$13.41
DAR Electric	\$ 34,402.93	Subcontractor	Electric services at various addresses		\$34,402.93	\$6,153.00
Dobek Carpentry	\$6,537.00	Subcontractor	Oral contract to do carpentry for \$10,100 for Magdalena Rosas at 2917 N 75th Ave., Elmwood park, IL. \$4k deposit received. \$537 in lien fees. Lien was recorded. Notes indicate Dobek finished framing	Adjusted to \$6,100; lien fees not agreed to	\$6,100.00	\$1,090.99
Doug's Custom Flooring	\$2,630.00	Subcontractor	Hired to do remodel for Sue Chang; owner wouldn't pay electrical problem and rodding out pipes, but customer did pay FC \$2630		\$2,630.00	\$470.38
E& J Remodeling and Construction	\$ 38,000.00	Subcontractor	Restoration services on various jobs; no invoices or details attached. FC accounting records showed balance owed is only \$10,500	Adjusted to \$10,500, amount owed per FC accounting records	\$ 10,500.00	\$1,877.94

Gonzalez, Madeline	\$ 23,000.00	Customer	Additional info requested 6/13/16	Adjusted to \$8,555.87, difference between amount invoiced by FireClean (\$39,257.31) and amount received by FireClean per accounting records (\$47,813.18)	\$8,555.87	\$1,530.23
Harris, James and Donna	\$10,000	Customer	FC received \$10,000 to do work related to a fire; work not completed		\$10,000	\$1,788.51
Henpol construction	\$4,500.00	Subcontractor	Job at 1235 Shermer in Glenview. Contract for \$11,202; received \$6702		\$4500.00	\$804.83
Hett Associates	\$4,200.00	Professional - legal, taxes	Tax preparation fees		\$4200.00	\$751.17
Illinois Department of Revenue	\$6,877.45		Illinois taxes for 2014-2015		\$6,877.45	\$1,230.04
Insty Prints	\$ 60.41	General business charges	Business cards in 2013		\$ 60.41	\$10.80
Intelligent Systems Services	\$19,117.00	Subcontractor	Installed fire alarm system at Bristol Court		\$19,117.00	\$3,419.09
Jacklow, Jason	\$552.50	Vendor	Snow removal at Elk Grove warehouse		\$552.50	\$98.82
Jedrychowski, Jaye	\$7,316.47	Customer	Work not fully completed for job at 1601 S. Indiana		\$7,316.47	\$1,308.56
Kelly Plastering	\$4,780.00	Subcontractor	Services performed at Kupiec residence in Wilmette, IL on or around 5/21/14		\$4,780.00	\$854.91
Locher, Yvonne	\$2,738.44	Customer	FC received \$2,738.44 to do work related to water damage; work not completed		\$2,738.44	\$489.77
Makuch Garage Door	\$1,730	Subcontractor	Installation of garage doors for various customers		\$1,730.00	\$309.41
Marshall, Marc	\$ 70,169.00	Customer	Customer claims construction repair work not fully completed	Adjusted to \$38,680.23. Basis for request for \$70,169.00 not clear. It appears that mitigation and packout was completed. Also \$16,500 paid by FireClean to Shamuel for construction work.	\$38,680.23	\$6,918.00

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Nature's Way Landscaping, Inc.	\$360.00	Subcontractor	Landscaping services for May-July 2014		\$ 360.00	\$64.39
Oil Pro	\$ 229.70	General business charges	Oil changes on FireClean vehicles		\$ 229.70	\$41.08
Penske Truck Leasing Co., L.P	\$826.53	General business charges	Vehicles rented 5/16/14		\$826.53	\$147.83
PKD Enterprise p/k/a Roll-On Roll Off	\$6,320.00	Subcontractor	Provided dumpsters for FC jobs		\$ 6,320.00	\$1,130.34
PNC Bank	\$161,233.99	Bank - secured creditor	Secured -Agreed judgment in amount of \$129,560.13 plus \$31,673.86 for credit card		\$161,233.99	\$80,617.00
Proprestige, Inc.	\$ 25,150.00	Subcontractor	Contractor claims FC paid \$20k, balance owed for work in Park Ridge. No supporting documentation or indication regarding dates when work was completed, etc. Invoice generated in 2015.	Adjusted to \$3,500, balance owed per FC accounting records	\$ 3,500.00	\$625.98
Pro-Temp of Illinois, Inc.	\$30,410.00	Subcontractor	HVAC equipment provided at Bristol Court		\$30,410.00	\$5,438.86
Rdecor Pro, Inc.	\$6,270.00	Subcontractor	Painting and Carpentry at 434 Valencia, Barrington, and 715 Midwest		\$6,270.00	\$1,121.40
Reliable Housing	\$3,300.00	Subcontractor	Claim form indicates FC owner agreed to pay 1/2 of rent for Decker family until job was done. No supporting documents attached to claim form which confirm agreement or amounts	Adjusted to \$0 as no documents attached supporting amounts etc.	\$0.00	\$0.00
Retro Plumbing, Inc.	\$10,600.00	Subcontractor	work performed at 500 Thames, Park Ridge (installing sinks, etc.)		\$10,600.00	\$1,895.82
Shamuel, Ronnie	\$ 78,351.11	Subcontractor	Loans to FireClean and other payments made to contractors, Home Depot, Etc.	Adjusted to \$52,500. No supporting documentation for payments to Tile Contractors Inc., M. Valancia construction, E& J Construction.	\$52,000.00	\$9,300.25
Sherwood Law Group LLC	\$1,647.20	Professional - legal, taxes	Legal fees incurred June-July 2017		\$1,647.20	\$294.60
Silla, Richard M	\$ 10,324.00		Customer claims money owed from condo assn's insurance company in relation to Bristol Court matter	Adjusted to \$0. Funds not received from Bristol Court. Claim only public adjuster estimate. Documents submitted don't support claim against FireClean	\$0.00	\$0.00

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ThyssenKrupp Elevator	\$ 33,978.10	Subcontractor	Elevator upgrade at Bristol Court; deposit of \$18,295 paid		\$33,978.10	\$6,077.02
Tile Contractors, Inc	\$ 10,670.00	Subcontractor	Fees for tile work completed in 2013-2014 at 7 different properties		\$10,670.00	\$1,908.34
Touhy Ave - 1300 LLC	\$385,885.68	General business charges	Claim for rent at Touhy warehouse; \$300k agreed judgment order	Adjusted to \$300,000 per agreed judgment	\$300,000.00	\$53,655.30
U Line	\$471.65	General business charges	Office supplies/equipment ordered by FireClean Plus Inc. May 2014		\$ 471.65	\$84.36
VIP Tech Electric, Inc.	\$13,974.00	Subcontractor	Job at 2917 N 75th Ave., Elmwood Park, IL	Adjusted to \$0. No contract was attached and no contract could be found in file. No indication regarding what was completed or what price was agreed to. File also contains letter to customer indicating that they were responsible for electric charges.	\$0.00	\$0.00
Waggoner, Paul	\$9,924.74	Public Adjuster / Referral	5% of \$198k check, yes checked numbers. See if waived.	Adjusted to \$6974.38 (5% of amount actually recovered by FireClean after Metro claim)	\$6,974.38	\$ 1,247.37
Total:					Total:	Total:
\$1,050,091.36					\$810,536.11	\$196,745.33

34. In relation to the above-referenced claims, the Receiver has reviewed the documentation submitted by the claimants, as well as FireClean files his possession, in an attempt to determine the merits of each claim. However, due the fact that the Receiver was not involved in the operation of the business at the times when the above-listed claims arose, the Receiver would request that the parties advise the Court if they believe that any of the above-listed claims have not been evaluated properly.

35. As noted, only forty-three (43) individuals/entities submitted claims form, despite the fact that the forms were sent to no less than two hundred and eight (208) persons and entities.

Thus, in relation to the one hundred and sixty-eight persons/entities who did not submit a claim verification form, the Receiver recommends that these potential claimants be barred from receiving any distribution, as the terms of the claims verification form and previous order of this Court required claimants to submit a claim verification form as a prerequisite to eligibility for distribution.

36. In the context of receiverships, Illinois courts have recognized the appropriateness of a *pro-rata* distribution. For example, in *In re Liquidation of Pine Top Ins. Co.*, 322 Ill. App. 3d 693 (1st Dist. 2001), the court noted that “when the assets of an insurance company being liquidated are insufficient to pay creditors in full, creditors shall be paid on a pro rata basis.”

37. Additionally, while there is a limited amount of case law on the issue of an equity court’s discretion to award funds in a business receivership in state court, there is ample federal case law on the issue. See, i.e. *SEC v. Forex Asset Mgmt.*, 242 F.3d 325, 331 (5th Cir. 2001) (affirming *pro-rata* distribution plan because it was a “logical way to divide the money”). In approving a plan for distribution of Receivership assets, federal courts have recognized that courts of equity proceeding over receiverships are “afforded the discretion to determine the most equitable remedy.” *Id.* at 332; *SEC v. Enterprise Trust Co.*, 559 F.3d 649, 652 (7th Cir. 2009) (“judges possess discretion to classify victims sensibly in Receivership proceedings.”); *SEC v. Elliott*, 953 F.2d 1560, 1566 (11th Cir. 1992); *McFarland v. Winnebago S., Inc.*, 863 F. Supp. 1025, 1034 (W.D. Mo. 1994) (holding that a court presiding over an equity receivership has “extremely broad power to supervise the receivership and protect receivership assets.”).

38. Under the circumstances, for the non-secured creditors, the Receiver believes employing an equal, *pro rata* methodology is the most equitable method of distribution because it enables all of said claimants to receive some distribution (albeit minimal for most claimants)

and does not draw categorical distinctions among particular classes of creditors that ultimately would make little difference in terms of claimants' individual distribution amounts.

39. In relation to the recommendation that secured creditor PNC Bank be excluded from the *pro-rata* distribution plan and instead receive 50% of the amount sought, the Receiver notes that courts of equity overseeing a business receivership have broad equitable powers. And here, it is the Receiver's position that reducing PNC Bank's claim by 50% is the most fair and just method of granting some form of preference to their secured claim, while still ensuring that the remaining creditors and claimants are not left with nothing.

40. The Receiver believes that there is a strong basis to pay the claims in accordance with distribution set forth herein, and he thus requests that the amounts be approved for immediate payment.

41. Should the Court grant the Receiver's instant motion concerning distribution, within 30 days of distributing the funds to the eligible claimants, the Receiver plans to request an Order terminating the Receivership.

WHEREFORE, based on the foregoing, the Receiver, James E. Sullivan, respectfully requests that this Court grant the Receiver's motion and enter an order which:

- A. Approves this Final Report, including express approval of the Receiver and his counsel's conduct in performing the mandate of the Order appointing the Receiver;
- B. Authorizes the Receiver to pay the sums set forth herein to eligible claimants;
- C. Declares that debt is charged as to FireClean LLC and FireClean Plus Inc in relation to any persons/entities who received notice of the claims process described herein but how failed to submit a Claim Verification Form;

D. Declares that any entities receiving notice the receivership estate has no liability to prepare or file any further reports or tax documents; and

E. Grants the Receiver such other and further relief to which he may be justly entitled.

Respectfully Submitted,

By: /s/ Shannon V. Condon
One of the Receiver's Attorneys

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Shannon V. Condon
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EXHIBIT A

Potential claimants receiving notification of claims process on or around August 4, 2015

1	1st Ayd Corporation
2	Absolute Promotions, Inc.
3	Advanced Heating & Air, Inc.
4	Air Efficiency Inc.
5	Air Root
6	AJS Plumbing Inc.
7	Ally Bank
8	American Family Insurance Group
9	Anderson, Eric
10	AramSCO
11	ARC
12	AT&T Long Distance
13	Bade Products
14	Bank of America (Dallax TX and Wilmington DE addresses)
15	Bart Knoll Construction, Inc.
16	Beltrami, Lisa
17	Berry, Jeff
18	BK AUTO
19	Blackstone Restoration
20	Bogenschutz, David & Peggy
21	Booz, Gerald
22	Boyd, Arkell
23	Brasier, Bob
24	Bristol Court Condos
25	Callahan, William & Linda
26	Carney, Clifford & Marie
27	Carpenter, Lillie - Construction
28	Carpenter, Linda
29	CARQUEST
30	Castino Restoration
31	Claude Roos / Darlene Meller
32	CNASurety
33	Comcast Cable
34	ComEd
35	Composto, Denise
36	Cotter, Kevin
37	Cozzori, Margarita
38	Crisanto, Alexandra
39	Crown Services Inc.
40	Current Incident Notification Services
41	DAL, Inc.
42	DAR Electric Inc.
43	Davis, Henry
44	DCS Mechanical

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Potential claimants receiving notification of claims process on or around August 4, 2015

45	Decker, Jeff & Decker
46	Direct Warehouse / Clothing
47	Dobek Carpentry
48	Doug's Custom Flooring
49	Dubowski, Joe
50	E & J Remodeling and Construction
51	E.I.S. Group
52	Energy Seal Insulation Inc.
53	Esmail, Sari Darlene
54	Extended Stay America
55	Fallico, Rosalie
56	Falstad, Valerie
57	Faulkner House Condominiums
58	Fifth Third Bank Chicago
59	Flores, Emma
60	Ford Credit
61	Foreman, Pete & Sandy
62	Fredriksen Fire Equipment
63	Garcia, Ramon
64	Garfield Construction
65	Garrett, Margaret & Gregory
66	Gempp, Larry
67	Gene Goodwillie, Inc.
68	Goll, Tim
69	Gonzalez, Madeline
70	Gottlieb, Scott
71	Halas, Melissa
72	Hankins, Sarah
73	Harris, James
74	Henpol Construction, Inc.
75	Hett & Associates
76	Home Depot Credit SVCS
77	Howard, Mirtha
78	Hugo's Plumbing Inc.
79	Illinois Tollway
80	Indiana Secretary of State
81	Institute of Inspection Cleaning
82	Insty-Prints
83	Intelligent Systems Services
84	Internal Revenue Service Center
85	J.A.S. Insurance Services
86	Jacklow, Jason
87	Jedrychowski, Jaye
88	Jon-Don

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Potential claimants receiving notification of claims process on or around August 4, 2015

89	JR Kent Construction Co.
90	JR Windows Construction
91	Judah, Viola
92	K.Hoving Recycling & Disposal
93	Karpinski, Deborah
94	Kelly Plastering
95	K-I Construction Inc.
96	Kopinski, Joseph
97	Kudla, Matt - Repairs
98	Kupiec, David
99	Laird, Robby & Carri
100	Larry Bartoli
101	Liberty Furniture
102	Locher, Fred
103	Lucas, Kevin
104	Luu, Johnny & Nguyen, Chau
105	M. Valencia Construction Co.
106	Makush Door Company
107	Marcucci, Mark
108	Marine, Gary (GOLD MAX)
109	Marion, Desmond and Elizabeth
110	Marquez, Fernando
111	Marshall, Marc
112	Martin, Dick
113	MCH Construction
114	McHenry County Clerk
115	Mejia, Bernardo
116	Metropolitan Fire Protection
117	Midwest Rental & Supply, Inc.
118	Miller Industrial
119	Moda Furniture, Llc
120	Nature's Way Landscaping, Inc.
121	Nicor
122	Obrzut, Boguslawa Victoria
123	Office Depot
124	Oil Pro
125	O'Keefe, Deborah
126	Oles, Dennis
127	Ortiz, Moises
128	Orkin Commercial Services
129	Ortiz, Jose
130	Oshana, Nahyrn
131	Pagadala, Vsam
132	Palomar, Miguel

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Potential claimants receiving notification of claims process on or around August 4, 2015

133	Park Management / Unit 4306
134	Parker, Elizabeth
135	Payne, Lorie
136	Penske
137	Physicians Immediate Care - Chicago
138	PMI Diagnostic Imaging
139	Prather, Steve
140	Pro Prestige Inc
141	Pro Temp of Illinois Inc.
142	Pytel, Yanina
143	Quality Carpentry & Roofing
144	R.B. Plumbing & Sewer Inc.
145	Raid Yacoub
146	Ramirez, Manuel
147	RDecor Pro Inc.
148	Reliable Housing, Inc.
149	Remodelers Supply Center
150	Retro Plumbing Inc.
151	Reynolds, George & Marigrace
152	Riveria, Maria
153	Roewer, Elizabeth
154	Roll-On Roll-Off Inc.
155	Ronnie Shamuel
156	Rosas, Magdalena
157	Ruby, Brian & Pam
158	Runco Office Supply
159	Salette, Russ
160	Sanchez, Gabriel
161	Sandoval, Elsa
162	Sarzman, Daeiusz
163	Schaff, David & Susie
164	Schiavone, Christian & Jennifer
165	Schroeder, Keith
166	Secretary of State / Illinois
167	Sehafer, Adeline
168	Sherwood Law Group
169	Siebert, Lawrence
170	Silla, Rick
171	Simon, Ken & Brenda
172	SMG Security Systems, Inc.
173	Smith, Daniel & Virginia
174	Smith, Jim
175	Smith, Sharon C/O Claude Roos
176	Sonnenfeld, Charlotte

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Potential claimants receiving notification of claims process on or around August 4, 2015

177	Southland Flooring Supplies
178	Sprint
179	Stebner, Kelly
180	Stoner, Kyle
181	Sunleaf, Robert
182	Sunseri, Samuel
183	Swistowicz, Nancy
184	The Boiler Restaurant Group, LLC.
185	ThyssenKrupp Elevator
186	Tile Contractors Inc.
187	Tisdale, Bill
188	Tokarczyk, Brian
189	Top Board-Up LLC
190	Torres, Miguel
191	Tri-State Propane Exchange, LLC
192	U.S Bank
193	United Rent-A-Fence
194	United States Treasury *
195	Unlimited Fire Restoration
196	UPS
197	Urbaniec, John & Ann
198	Veltum, Vicki
199	Vento, Mark
200	Village of Hazel Crest
201	Village of Elmwood Park
202	Wessels, Laurie
203	Whitacre, David & Tammy
204	Williams, Doriann
205	Williamson, Gerald
206	Willsey, Pam
207	Wood Lawn Terrace
208	Xactware, Inc.

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EXHIBIT B

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

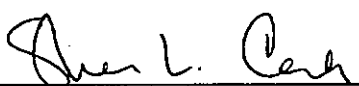
RONY SHAMUEL a/k/a)
RONNIE SHAMUEL,)
)
Plaintiff,)
)
v.)
)
CHRISTOPHER JURICA, JAY)
JURICA, and FIRE CLEAN PLUS, INC.,)
)
Defendants.)
_____)

Case No. 2014 CH 10751
Consolidated with 2014 M1 717314
Honorable Neil H. Cohen

NOTICE OF MOTION

To: See attached Service List


PLEASE TAKE NOTICE that on July 21, 2015, at 10:30 a.m. I will appear before the Honorable Neil H. Cohen presiding in courtroom 2308 in the Richard J. Daley Center, 50 W. Washington Street, Chicago, Illinois, and then and there present the Receiver's Motion to Establish Claims Process, a copy of which is herewith served upon you.

By: 
One of the Receiver's Attorneys

James B. Koch
Shannon V. Condon
GARDINER KOCH WEISBERG & WRONA
53 W Jackson Blvd, Ste. 950
Chicago, IL 60604
312.362.0000
312.362.0440 fax
Atty No.: 29637

CERTIFICATE OF SERVICE

I, Shannon V. Condon, an attorney, certify that I caused a copy of the foregoing instrument to be served upon the below listed parties who have appeared in this case via regular mail from the offices located at 53 W. Jackson Blvd, Suite 950, Chicago, IL, 60604 before 5:00 p.m. on this 19th day of June. I further certify that copies of the instant motion, together with this notice and all exhibits, will be served on all known claimants by US Mail no later than June 30, 2015.



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Attorney for Plaintiff PNC Bank
Mr. Kenneth Strauss
Ms. Christina K. Brunka
Arnstein & Lehr, LLP
1220 S. Riverside Plaza, Suite 1200
Chicago, IL 60606-3910
Ph.: 312-876-6929
Fax: 312-876-6248
kstrauss@arnstein.com
ckbrunka@arnstein.com

Attorney for Ronnie Shamuel
Mr. David T. Arena
DiMonte & Lizak, LLC
216 Higgins Rd.
Park Ridge, IL 60068
Fax: 847-698-9623
darena@dimontelaw.com

Attorney for Landlord – Touhy Ave.
1300 LLC
Mr. John Stanis
Mr. David Stein
Masuda, Funai, Eifert & Mitchell, Ltd
200 N. Martingale Road, Suite 800
Schaumburg, IL 60173-2033
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jstanis@masudafunai.com
dstein@masudafunai.com

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Fax: 847-394-3303

Attorney for Bayview
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Mr. Craig Smith
Smith & Weik, LLC
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Attorney for Drake Hotel/Nagle
Law Office of Kevin J. Moore, PC
4356 Lawn Avenue, Suite 7
Western Springs, IL 60558
Ph: 708-246-1595
kevin@kjmoorelaw.com

Defendants (pro se)
Mr. Chris Jurica
6107 Pheasant Ridge Dr
Plainfield, IL 60586
Email: cjurica723@hotmail.com
Phone: 815-995-3058

Mr. Jay Jurica
18854 Palomino Ct.
Shorewood, IL. 60404
Email: jayj@comcast.net

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

RONY SHAMUEL a/k/a)
RONNIE SHAMUEL,)
)
Plaintiff,)
)
v.)
)
CHRISTOPHER JURICA, JAY)
JURICA, and FIRE CLEAN PLUS, INC.,)
)
Defendants.)
)
_____)

Case No. 2014 CH 10751
Consolidated with 2014 M1 717314
Honorable Neil H. Cohen

**RECEIVER'S MOTION TO ESTABLISH CLAIMS AND DISTRIBUTION
PROCESS AND APPROVE CLAIM VERIFICATION FORM**

Now comes JAMES E. SULLIVAN, as the Receiver ("Receiver") for Fire Clean, LLC and Fire Clean Plus, Inc. (collectively "Fireclean"), by and through his attorneys, GARDINER KOCH WEISBERG & WRONA, and pursuant to the powers vested in him by the Order entered July 8, 2014, seeks this Court's approval of proposed claims and distribution procedures. In support of his Motion, the Receiver states as follows:

1. Pursuant to the July 8, 2014 Order entered by this Court, the Receiver was granted authority to take immediate possession of the assets of Fireclean LLC and Fireclean Plus, Inc. (collectively, the "Fireclean Entities"), and collect monies owed to the Fireclean Entities.
2. On October 3, 2014, the Court granted the Receiver leave to sell the assets of the Fireclean Entities.
3. The Receiver and his retained professionals have certain Fireclean records pursuant to which the Receiver was able to identify potential customers and creditors to whom the Fireclean Entities may be indebted.

4. Anticipated claims by Fireclean customers, vendors, and other interested parties will likely far exceed the amount of receivership funds. As a result, the Receiver believes it is fair to say that any person or entity with any claim against receivership assets will only receive a very small fraction of any amount claimed.

5. The Receiver has determined that it would be in the best interests of the Receivership for the Court to establish claims verification procedures, including without limitation specified procedures, claims verification forms, a claims bar date, and procedures for the filing and approval of the Receiver's distribution plan.

6. The Receiver recommends that the Court approve a process whereby the Receiver will endeavor to send a claim verification form and notice, in the nature of the form attached hereto as Exhibit 1, to known customers and creditors whom the Receiver has identified and for whom the Receiver has a mailing address. After approved by this Court, the Receiver will then mail a claim form by US Mail to all known potential claimants.

7. The proposed claim form specifies both that the form must be completed and submitted to the Receiver by the claims bar date set by the Court and that the claimant must submit any documentation to substantiate the basis for all amounts that the claimant believes are owed along with an attestation under oath verifying the authenticity and accuracy of all such documentation or information submitted. (See Exhibit 1.) In order to complete the claims verification process in a timely and cost-effective manner, the Receiver recommends that the Court establish a deadline of 28 days - from the date on which the Receiver certifies the actual date of mailing such forms - for all claimants to submit a claim verification form along with all supporting documentation and the required attestation.

8. The Receiver recommends that failure of a customer or creditor to submit a claim verification form by the claims submission date shall be a basis for objection to and denial of that claim and that any untimely filed claims shall not be entitled to receive distribution unless the Court excuses the failure.

9. In addition, the Receiver recommends that any documentation or information submitted to the Receiver that is not verified as to its authenticity and accuracy need not be considered by the Receiver for identifying claimants and/or determining claim amounts.

10. After the claims verification process has been completed by the Receiver, the Receiver proposes to file a Motion to Approve Distribution Plan. The Receiver's Motion to Approve Distribution Plan will set forth the Receiver's recommendations to the Court for distribution including an explanation as to eligibility, methodology, and recommended distribution amounts.

11. The Receiver recommends that the Court further find and order, particularly in light of the limited receivership assets, that the Receiver may also provide adequate notice of the all other future notices/pleadings/orders or the like relating to the claim process, including the proposed distribution plan, merely by the posting of the documents on the Receiver's counsel's web site (www.gkwlaw.com).¹ The Receiver will however mail by US Mail physical copies of both the instant motion and the claim form which is later approved by this Court to all known potential claimants. The Receiver will also mail physical copies of the filings to claimants who have indicated that they are unable to access the website.

¹ The Receiver will also mail a letter to all potential claimants that indicates that unless a claimant specifically submits a written request to the Receiver indicating good cause for their inability to access the Receiver's counsel's website in the future, and unless the Court orders otherwise, then all future notices and documents (aside from the blank claim form) will be made by posting to the Receiver's counsel's website only, or in some cases, by email.

12. The Receiver therefore recommends that the Court approve the proposed claim verification form submitted herewith, which identifies the fact that potential claimants who have filed a claim verification form will receive only electronic notice of the filing of the Receiver's proposed distribution plan, which will be available for review on the Receiver's counsel's web site and will be posted within a reasonable time after it is filed.

13. The Receiver further proposes that any and all objections to the Receiver's distribution plan be filed with the Court within 28 days of the date the Receiver files his distribution plan. This deadline will also be identified in the claim verification form.

14. Finally, the Receiver requests that the Court set a final approval hearing date for the Receiver's Motion to Approve Distribution Plan of no less than 14 days from the deadline for objections to the Receiver's proposed distribution plan.

WHEREFORE, the Receiver respectfully requests that the Court grant his Motion and enter an Order establishing claims verification procedures, claims verification forms, claims bar date, and procedures for approval of the receiver's distribution plan, consistent with the terms proposed herein. (A Proposed Order is attached hereto as Exhibit 2.)

Respectfully Submitted,

By: 
One of the Receiver's Attorneys

James B. Koch
Shannon V. Condon
Gardiner, Koch, Weisberg & Wrona
53 West Jackson Blvd. Suite 950
Chicago, Illinois 60604
T (312) 362-0000
Atty No. 58588

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JAMES E. SULLIVAN
Receiver for Fireclean LLC and Fireclean Plus, Inc.
c/o Gardiner, Koch, Weisberg & Wrona
53 West Jackson Blvd. Suite 950
Chicago, Illinois 60604
T (312) 362-0000; Fax (312) 362-0440
Email: fireclean@gkwlaw.com

Re: *Shamuel v. Jurica et al.* ("Fireclean Receivership"), No: 14-CH-10751

IMPORTANT NOTICE

On June 26, 2014, the above-referenced lawsuit was filed by the Plaintiff, Ronnie Shamuel, against Defendants Christopher Jurica, Jay Jurica, and Fire Clean Plus, Inc. On July 8, 2014, James E. Sullivan was appointed Receiver for Fireclean. The Receiver was thereafter directed to gather all recoverable Fireclean assets, wherever located, in an effort to ultimately liquidate and distribute assets to defrauded investors and creditors. The amount of money available for distribution to eligible claimants is only a small fraction of anticipated potential claims.

The reverse side of this notice contains a claim verification form that you must submit to the Receiver in order to be eligible to receive any funds that the Receiver may later distribute in connection with the above-referenced lawsuit. The purpose of this claim verification form is to provide the Receiver with information necessary to verify the information he has obtained regarding your claim. **In order to be eligible to receive a distribution of the Receivership entities' assets, you MUST complete the attached claim verification form and submit the signed claim form electronically, together with all supporting documents, by emailing the documents to Fireclean@gkwlaw.com no later than _____, 2015.** Please keep a copy of this claim verification form, and any documents submitted with it, for your records.

To be eligible for any distribution, you must complete and submit this claim verification form electronically by _____, 2015, even if you have previously submitted correspondence and/or documents to the Receiver, to a lawyer, to a government agency, or to law enforcement officials. You must also submit documentation or other evidence to substantiate the basis for all amounts that you believe are due and owing to you from Fireclean LLC and Fireclean Plus, Inc., together with an attestation under oath verifying the authenticity and accuracy of the information of all such documentation or information submitted.

Please note that the Court has approved this claim verification form and the submission deadline. Any person or entity completing this claim verification form submits to the exclusive jurisdiction of the Circuit Court of Cook County, Chancery Division, for all purposes, including without limitation, as to any claims, objections, defenses or counterclaims that could be asserted by the Receiver against any claimant, arising out of any and all business transacted by or with Fireclean LLC and Fireclean Plus, Inc. Claimants further waive any right to a jury trial with respect to such claims, objections, defenses, or counterclaims.

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CLAIM VERIFICATION FORM

I. Claimant/Creditor Information:

1. Claimant/Creditor Name: _____

2. Address: _____

3. Telephone Number: _____

4. Email Address: _____

5. Social Security/Tax I.D. Number*: _____

6. Amount of money owed by Fireclean Entities to claimant**: \$ _____

7. Check this box if you believe that anyone else may file claim verification form relating to this claim. Attach copy of statement giving particulars.

8. Basis for claim - State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, car loan, mortgage note, and credit card, etc. You may be required to provide additional disclosure if an interested party objects to the claim. You should attach this form redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, etc.: _____

**The Internal Revenue Service (IRS) requires that all U.S. recipients of distribution checks provide social security or tax identification numbers to the Receiver. No check will be issued without a corresponding social security or tax identification number.*

***The Receiver may elect not to consider any amounts for which the claimant has not verified the authenticity and accuracy of documentation or information submitted in connection with their claim. If the claim includes interest or other charges in addition to the principal amount of the claim, attach a statement that itemizes interest or charges.*

II. Representations:

- a) Claimant/creditor acknowledges and agrees that by submitting this claim verification form, claimant/creditor subjects his/her/its claim to the jurisdiction of the Circuit Court of Cook County, Chancery Division, which is administering the Receivership Estate ("Receivership Court"). Claimant/creditor further agrees that his/her/its claim shall be adjudicated, determined and paid as ordered by the Receivership Court. Claimant/creditor further consents to, and understands that the Receivership Court will determine: (i) his/her/its right to any money from the Receivership Estate, if any is available; (ii) the priority of his/her/its

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claim; (iii) the scheduling and allocation of any assets to be distributed; and (iv) all objections and disputes regarding the allowance of his/her/its claim by the Receiver, which shall be submitted to and subject to review by the Receivership Court for a final ruling without a jury.

- b) Claimant/creditor represents that claimant/creditor has not sold, assigned, transferred, or in any way conveyed his/her/its interest in or claim against the Receivership Estate. From the date of this form, claimant/creditor agrees not to sell, convey, assign or transfer his/her/its interest in or claim against the Receivership Estate prior to the date(s) of distribution. In the event that his/her/its interest is transferred prior to the date of any distribution, except by operation of law, claimant/creditor agrees that such transfer or assignment shall be null and void and unenforceable by any successor third party.
- c) Claimant/creditor acknowledges that Claimant/creditor will not receive written notice of the Receiver's proposed distribution plan, and that notice of all future motions/pleadings/orders related to the receivership distribution will be provided only by email to claimants who have submitted a claim form, and by the posting of the documents on the receivership section of the Receiver's counsel's website (gkwwlaw.com).
- d) Claimant/creditor acknowledges that any and all objections to the Receiver's distribution plan must be filed with the Court within **28 days** of the date the Receiver files his distribution plan. **The Receiver may not file his proposed distribution plan for several months.** All claimants who have submitted a claim form will be notified via electronic mail when the Receiver's proposed distribution plan has been filed, and the proposed distribution plan will be posted on the receivership section of the Receiver's counsel's website (gkwwlaw.com).

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I declare under penalty of perjury under the laws of the United States of America that all of the statements made in this Claim Verification Form are true and correct. I further attest that all documentation submitted to the Receiver in connection with this claim is authentic and accurate.

Signature: _____
(Claim Verification Form not valid unless signed)

Date: _____

Check the appropriate box:

- I am the claimant/creditor or an employee of claimant/creditor.
- I am the claimant/creditor's authorized agent.

Print Name: _____

Title: _____

Company: _____

Address (if different from above): _____

Phone number (if different from above): _____

Email (if different from above): _____

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

RONY SHAMUEL a/k/a)
RONNIE SHAMUEL,)
)
Plaintiff,)
)
v.)
)
CHRISTOPHER JURICA, JAY)
JURICA, and FIRE CLEAN PLUS, INC.,)
)
Defendants.)
)
_____)

Case No. 2014 CH 10751

Consolidated with 2014 M1 717314

Honorable Neil H. Cohen

ORDER

This matter coming to be heard on the Receiver's Motion to Establish Claims and Distribution Process, due notice being given, and the Court being fully advised in the premises,

IT IS HEREBY ORDERED:

1. The Receiver's Motion is GRANTED.
2. The Receiver shall file a certification with the Court that the Receiver has mailed by US Mail to all known claimants a claim verification form in the nature of the form attached to the Receiver's Motion on or before _____, 2015.
3. Potential claimants shall submit a completed claim verification form, together with all supporting documentation, no later than 28 days following the Receiver's certified mailing date. Failure of a customer or creditor to submit a claim verification form by said date shall be a basis for objection to and denial of that claim. In addition, any untimely filed claims shall not be entitled to receive distribution unless excused by the Court by order upon good cause shown.
4. Claimants who have submitted verified claim verification forms to the Receiver shall be notified by electronic mail when the Receiver's Proposed Distribution Plan has been filed.
5. In light of the limited receivership assets available, the Court finds that the posting of documents such as the Receiver's Proposed Distribution Plan on the receivership section of the Receiver's counsel's website (www.gkwwlaw.com), and orders/filings related thereto, shall constitute adequate and effective notice.

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PAGE 8 of 26



6. Any and all objections to the Receiver's proposed distribution plan shall be filed with the Court no later than 28 days after the date the Receiver files his proposed plan.

ENTERED:

DATED: _____

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EXHIBIT C

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, CHANCERY DIVISION

RONY SHAMUEL a/k/a)
 RONNIE SHAMUEL,)
)
 Plaintiff,)
)
 v.)
)
 CHRISTOPHER JURICA, JAY)
 JURICA, and FIRE CLEAN PLUS, INC.,)
)
 Defendants.)
)
 _____)

Case No. 2014 CH 10751
 Consolidated with 2014 M1 717314
 Honorable Neil H. Cohen

ORDER

This matter coming to be heard on the Receiver's Motion to Establish Claims and Distribution Process, due notice being given, and the Court being fully advised in the premises,

IT IS HEREBY ORDERED:

1. The Receiver's Motion is GRANTED.
2. The Receiver shall file a certification with the Court that the Receiver has mailed by US Mail to all known claimants a claim verification form in the nature of the form attached to the Receiver's Motion on or before August 4, 2015.
3. Potential claimants shall submit a completed claim verification form, together with all supporting documentation, no later than 28 days following the Receiver's certified mailing date. Failure of a customer or creditor to submit a claim verification form by said date shall be a basis for objection to and denial of that claim. In addition, any untimely filed claims shall not be entitled to receive distribution unless excused by the Court by order upon good cause shown.
4. Claimants who have submitted verified claim verification forms to the Receiver shall be notified by electronic mail when the Receiver's Proposed Distribution Plan has been filed.
5. In light of the limited receivership assets available, the Court finds that the posting of documents such as the Receiver's Proposed Distribution Plan on the receivership section of the Receiver's counsel's website (www.gkwwlaw.com), and orders/filings related thereto, shall constitute adequate and effective notice.

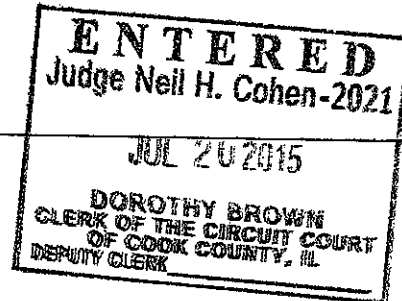
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 PAGE 28 of 26



6. Any and all objections to the Receiver's proposed distribution plan shall be filed with the Court no later than 28 days after the date the Receiver files his proposed plan.

DATED: _____

ENTERED:



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EXHIBIT D

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

RONY SHAMUEL a/k/a)
RONNIE SHAMUEL,)
)
Plaintiff,)
)
v.)
)
CHRISTOPHER JURICA, JAY)
JURICA, and FIRE CLEAN PLUS, INC.,)
)
Defendants.)
)
_____)

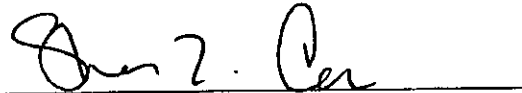
Case No. 2014 CH 10751

Consolidated with 2014 M1 717314

Honorable Neil H. Cohen

CERTIFICATION OF MAILING

I, Shannon V. Condon, an attorney, do hereby affirm under oath that I served copies of the court-approved Claim Verification Form attached hereto as Exhibit A upon all known potential claimants and/or creditors of Fire Clean LLC or Fireclean Plus, Inc. by US mail, first class, postage pre-paid, from 53 W. Jackson Blvd., Chicago, Illinois, on or before the hour of 5:00pm on this 4th day of August, 2015.



James B. Koch
Shannon V. Condon
GARDINER KOCH WEISBERG & WEISBERG
Attorneys for Plaintiff
53 West Jackson Blvd., Suite 950
Chicago, IL 60604
312/362-0000

JAMES E. SULLIVAN
Receiver for Fireclean LLC and Fireclean Plus, Inc.
c/o Gardiner, Koch, Weisberg & Wrona
53 West Jackson Blvd. Suite 950
Chicago, Illinois 60604
T (312) 362-0000; Fax (312) 362-0440
Email: fireclean@gkwwlaw.com

Re: *Shamuel v. Jurica et al.* ("Fireclean Receivership"), No: 14-CH-10751

IMPORTANT NOTICE

On June 26, 2014, the above-referenced lawsuit was filed by the Plaintiff, Ronnie Shamuel, against Defendants Christopher Jurica, Jay Jurica, and Fire Clean Plus, Inc. On July 8, 2014, James E. Sullivan was appointed Receiver for Fireclean. The Receiver was thereafter directed to gather all recoverable Fireclean assets, wherever located, in an effort to ultimately liquidate and distribute assets to defrauded investors and creditors. The amount of money available for distribution to eligible claimants is only a small fraction of anticipated potential claims.

The reverse side of this notice contains a claim verification form that you must submit to the Receiver in order to be eligible to receive any funds that the Receiver may later distribute in connection with the above-referenced lawsuit. The purpose of this claim verification form is to provide the Receiver with information necessary to verify the information he has obtained regarding your claim. **In order to be eligible to receive a distribution of the Receivership entities' assets, you MUST complete the attached claim verification form and submit the signed claim form electronically, together with all supporting documents, by emailing the documents to Fireclean@gkwwlaw.com no later than September 1, 2015.** Please keep a copy of this claim verification form, and any documents submitted with it, for your records.

To be eligible for any distribution, you must complete and submit this claim verification form electronically by September 1, 2015, even if you have previously submitted correspondence and/or documents to the Receiver, to a lawyer, to a government agency, or to law enforcement officials. You must also submit documentation or other evidence to substantiate the basis for all amounts that you believe are due and owing to you from Fireclean LLC and Fireclean Plus, Inc., together with an attestation under oath verifying the authenticity and accuracy of the information of all such documentation or information submitted.

Please note that the Court has approved this claim verification form and the submission deadline. Any person or entity completing this claim verification form submits to the exclusive jurisdiction of the Circuit Court of Cook County, Chancery Division, for all purposes, including without limitation, as to any claims, objections, defenses or counterclaims that could be asserted by the Receiver against any claimant, arising out of any and all business transacted by or with Fireclean LLC and Fireclean Plus, Inc. Claimants further waive any right to a jury trial with respect to such claims, objections, defenses, or counterclaims.

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CLAIM VERIFICATION FORM

I. Claimant/Creditor Information:

1. Claimant/Creditor Name: _____
2. Address: _____
3. Telephone Number: _____
4. Email Address: _____
5. Social Security/Tax I.D. Number*: _____
6. Amount of money owed by Fireclean Entities to claimant**: \$ _____
7. Check this box if you believe that anyone else may file claim verification form relating to this claim. Attach copy of statement giving particulars.
8. Basis for claim - State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, car loan, mortgage note, and credit card, etc. You may be required to provide additional disclosure if an interested party objects to the claim. You should attach this form redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, etc.: _____

**The Internal Revenue Service (IRS) requires that all U.S. recipients of distribution checks provide social security or tax identification numbers to the Receiver. No check will be issued without a corresponding social security or tax identification number.*

***The Receiver may elect not to consider any amounts for which the claimant has not verified the authenticity and accuracy of documentation or information submitted in connection with their claim. If the claim includes interest or other charges in addition to the principal amount of the claim, attach a statement that itemizes interest or charges.*

II. Representations:

- a) Claimant/creditor acknowledges and agrees that by submitting this claim verification form, claimant/creditor subjects his/her/its claim to the jurisdiction of the Circuit Court of Cook County, Chancery Division, which is administering the Receivership Estate ("Receivership Court"). Claimant/creditor further agrees that his/her/its claim shall be adjudicated, determined and paid as ordered by the Receivership Court. Claimant/creditor further consents to, and understands that the Receivership Court will determine: (i) his/her/its right to any money from the Receivership Estate, if any is available; (ii) the priority of his/her/its

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claim; (iii) the scheduling and allocation of any assets to be distributed; and (iv) all objections and disputes regarding the allowance of his/her/its claim by the Receiver, which shall be submitted to and subject to review by the Receivership Court for a final ruling without a jury.

- b) Claimant/creditor represents that claimant/creditor has not sold, assigned, transferred, or in any way conveyed his/her/its interest in or claim against the Receivership Estate. From the date of this form, claimant/creditor agrees not to sell, convey, assign or transfer his/her/its interest in or claim against the Receivership Estate prior to the date(s) of distribution. In the event that his/her/its interest is transferred prior to the date of any distribution, except by operation of law, claimant/creditor agrees that such transfer or assignment shall be null and void and unenforceable by any successor third party.
- c) Claimant/creditor acknowledges that Claimant/creditor will not receive written notice of the Receiver's proposed distribution plan, and that notice of all future motions/pleadings/orders related to the receivership distribution will be provided only by email to claimants who have submitted a claim form, and by the posting of the documents on the receivership section of the Receiver's counsel's website (gkwwlaw.com).
- d) Claimant/creditor acknowledges that any and all objections to the Receiver's distribution plan must be filed with the Court within 28 days of the date the Receiver files his distribution plan. **The Receiver may not file his proposed distribution plan for several months.** All claimants who have submitted a claim form will be notified via electronic mail when the Receiver's proposed distribution plan has been filed, and the proposed distribution plan will be posted on the receivership section of the Receiver's counsel's website (gkwwlaw.com).

I declare under penalty of perjury under the laws of the United States of America that all of the statements made in this Claim Verification Form are true and correct. I further attest that all documentation submitted to the Receiver in connection with this claim is authentic and accurate.

Signature: _____
(Claim Verification Form not valid unless signed)

Date: _____

Check the appropriate box:

- I am the claimant/creditor or an employee of claimant/creditor.
 I am the claimant/creditor's authorized agent.

Print Name: _____

Title: _____

Company: _____

Address (if different from above): _____

Phone number (if different from above): _____

Email (if different from above): _____

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