

EXHIBIT B



GLASS

September 10, 2017

Hans Clausen, Esq
Senior Staff Attorney
Federal Trade Commission
Bureau of Consumer Protection

Dear Hans:

Thank you again for your call this afternoon regarding a potential Receivership need.

As requested I am attaching for your review my CV detailing my background. In summary, I have over 35-years' experience in the financial services industry, with the vast majority of that being focused on problem asset management, including the liquidation of foreclosed assets as part of the problem resolution process. This included 18 years working for banks within their Special Assets Department where I was responsible for the management of the bank's troubled loans as well as overseeing the investigation of fraud and fund tracing activities related to those loans.

For the past 8 years I have been a Senior Managing Director of GlassRatner Advisory and Capital Group, LLC, an Atlanta-based financial advisory firm.

As a sample of specific Fiduciary Assignments that I have filled I would offer the following:

- Receiver for Pro Premium Finance Company (*17th Judicial Circuit Court, Broward County, FL, Complex Business Division, Case 15-16929 (07)*), a provider of insurance premium financing throughout the East Coast that was rendered insolvent as the result of an external fraud. Over the course of the Receivership I oversaw and managed the administration and collection of a \$70 million consumer loan portfolio and wound down the company's financial affairs. I was additionally responsible for performing a forensic review of the alleged fraud, developing details related to the nature and effect of the fraud and providing our findings to the Federal Bureau of Investigation for potential prosecution of the responsible parties.
- Receiver for TNP Enterprises (*Northern District of Georgia, Newnan Division; Case No. 3:16-CV-0031-TCB*), a taxi medallion leasing company located in Newnan, GA. Activities taken during the course of this engagement include retrieving and securing cash assets, locking down all depository accounts, resolving disputes with a defaulted taxi-cab operator and arrange for the redeployment of those medallions to another operator to resume the flow of funds into the Receivership Accounts.

ATLANTA • BAKERSFIELD • CHICAGO • DALLAS • FORT LAUDERDALE • IRVINE
LOS ANGELES • NEW YORK • ORLANDO • PHOENIX • TAMPA • WEST PALM BEACH

200 East Broward Blvd. Suite 1010 Fort Lauderdale, FL 33301 Tel 954.859.5066 Fax 954.859.5068 www.GlassRatner.com

- Assignee for the Benefit of the Creditors in the matter of Unified Communications International and Affinity LAC Group LLC (*11th Judicial Circuit Court, Miami-Dade County FL; Case Non 20158-029731-CA-01*), a provider of high-end corporate communications equipment for clients throughout Latin America. Responsibilities included securing and accounting for all cash assets and depository accounts, inventorying and liquidating all remaining inventory, equipment and other fixed assets, disposing of contracts and other superior obligations and recovering as much of the accounts receivable outstanding.
- Chief Restructuring Officer for Star Computer Group, Inc. (*US Bankruptcy Court, Southern District of Florida, Miami Division; Case No. 15-28100-BAK-AJC*), a \$450 million distributor of smart phones, tablets and computers throughout Latin America and the Caribbean. My duties include performing a detailed analysis of the company's financial conditions and prospects for recover, developing a Plan of Reorganization for approval of the Court, and then overseeing the execution of that Plan.

For your review, I am also attaching My standard billing rate is \$425.00 per hour. As is our firm's practice for the FTC we will adjust those rates downward to \$395 for this matter.

Please let me know if you have any questions.

Sincerely,

James S. Howard
Senior Managing Director



GLASS

Jim Howard

Resume

(954) 859-5076

200 East Broward Boulevard

Suite 1010 Fort Lauderdale, FL 33301

jhoward@glassratner.com

SUMMARY

Jim Howard is a Senior Managing Director of GlassRatner Advisory and Capital Group, LLC, a national financial advisory firm based in Atlanta, GA. He has over 35 years' experience within the financial services industry, more than 25 years of which has been dedicated to turnaround management and the resolution of commercial and real estate problem loans.

**RELEVANT
EXPERIENCE**

GlassRatner Advisory & Capital Group LLC

March 2008 – Present

Senior Managing Director

Fort Lauderdale, FL

Responsible for providing a variety of advisory services to a diverse list of Commercial and Commercial Real Estate clients throughout the United States. Primary duties include working with both debtors and creditors on the analysis of business situations, developing strategies for resolving specific problems and then assist in the implementation of the proposed solutions. Partial listings of engagements in which I have been involved include:

- Financial Advisor to the Unsecured Creditors Committee of a multifamily developer based in San Diego, CA with over \$4 billion in debt secured by over 250 apartment properties located throughout the United States. Subsequent to this assignment my role was converted to that of Financial Advisor to the Liquidating Trust Oversight Committee and oversaw the eventual wind down and liquidation of the firm.
- Financial Advisor to a national lender engaged to perform a forensic review of collateral securing a \$38 million facility including an investigation of cash flow

ATLANTA ▪ BAKERSFIELD ▪ CHICAGO ▪ DALLAS ▪ FORT LAUDERDALE ▪ HOUSTON
IRVINE ▪ LOS ANGELES ▪ NEW YORK ▪ PHOENIX ▪ TAMPA ▪ WEST PALM BEACH

200 East Broward Blvd. Suite 1010 Fort Lauderdale, FL 33301 Tel 954.859.5066 Fax 954.859.6068 - www.GlassRatner.com

receipts and disbursements by a borrower and assist in the development of restructuring proposal.

- Chief Restructuring Officer for an international wholesaler/manufacturer of smart phones, tablets and computers with annualized sales volume of \$450 million. My duties included working with both Secured and Unsecured Creditors, developing a Liquidating Plan of Reorganization and executing the plan post-confirmation.
- Receiver for an insurance premium finance company responsible for the liquidation of a \$75 million portfolio of receivables and wind down of operations.
- Financial Advisor to a designer/distributor/servicer of “unified communications” systems throughout Latin America and the Caribbean with an annualized sales volume of more than \$20 million.

In addition to the above, I have been involved with the renegotiation and settlement discussions with “Special Servicers” on more than \$400 million in defaulted CMBS loans. I also regularly serve as an Expert Witness in State, Federal and Bankruptcy courts through-out the country for litigation involving financing, banking and real estate matters as more specifically listed later in this report.

Wachovia Bank, NA (Formerly First Union National Bank)

September 2006 – May 2008

Market Manager, Real Estate Financial Services

West Florida Region

Directed the bank's marketing effort to commercial real estate developers in the West Florida Region. Primary duties consisted of seeking out lending opportunities for a variety of construction and development projects, including condominiums, apartments, retail and general commercial usage. Managed a staff of seven lenders. In addition, managing a loan portfolio with over \$2.4 billion in loan commitments I was also responsible for coordinating the marketing of other products offered by the bank including an extensive array of Conduit Lending, Capital Markets, Private Client, Capital Management Residential Mortgage and Cash Management products. During my tenure our department consistently ranked among the highest performing units within the bank's Real Estate Financing Services business segment.

Wachovia Bank, NA (Formerly First Union National Bank)

January 2000 – August 2006

Senior Relationship Manager, Real Estate Financial Services

Southwest Florida Region

Responsible for the creation and implementation of the bank's marketing effort to real estate developers in Florida's Gulf Coast Region. Primary duties consisted of seeking out lending opportunities for a variety of construction and development projects, including single family residential, condominiums, apartments, retail and general commercial usage. Managed a staff of two lenders. This job also includes a responsibility for offering the bank's other products, including an extensive array of Conduit Lending, Capital Markets, Private Client, Capital Management and Cash Management products. During my tenure the total Loan Commitments increased from \$125 million to over \$1.3 billion. In 2005 I was recognized as the number one producing Relationship Manager in the Corporation with total loan closings of over \$1.8 billion.

Wachovia Bank, NA (Formerly First Union National Bank)

April 1998 – December 1999

Market Manager, Real Estate Financial Services

Georgia Region

Responsible for managing seven Relationship Managers within the Commercial Real Estate department for the State of Georgia. A significant amount of time was also spent on corporate wide issues relating to First Union's Real Estate lending efforts, including membership on the "Real Estate Steering Committee", a policy development and implementation body for the corporation.

Wachovia Bank, NA (Formerly First Union National Bank)

August 1995 – April 1998

Regional Manager, Special Assets Department

Responsible for the management of a unit created to manage classified and criticized commercial loans within First Union, as well as to address other problem loan situations. During my tenure, the non-performing loan portfolio was reduced from a high of \$220 million to less than \$5 million. Managed a staff of six lenders

and three support personnel. In addition, I served as a member of the Special Assets Steering Committee, designated with responsibility for the creation and maintenance of the bank's policies and procedures related to handling problem commercial loans and the disposition of foreclosed assets. I also served on the task force created for the purpose of designing and implementing a corporate-wide data base created for the management and tracking of problem loan relationships.

Wachovia Bank, NA (Formerly First Union National Bank)

June 1991 – April 1998

Senior Special Assets Officer/Team Leader, Special Assets Department

Responsible for the management of a portfolio of "problem assets", consisting of both commercial and real estate loans within the Georgia Region. Portfolio averaged \$30 million to \$50 million in outstandings. (The period of June, 1991 to July, 1993 was with First American Bank of Georgia, which was acquired by First Union Bank, NA in July, 1993)

Hibernia National Bank

June 1989 – June 1991

Senior Special Assets Officer, Special Assets Department

New Orleans, LA

Responsible for the management and collection of a \$100 million portfolio of problem commercial loans for this medium sized regional bank. A sizable portion of the portfolio consisted of participations in multibank "highly leveraged transactions", requiring knowledge of problem asset reduction strategies and complex bankruptcy proceedings as well knowledge of dealing with multiple member bank groups. Among the more notable credits I was responsible for managing on behalf of Hibernia:

- Federated Department Stores
- Mays/Macy's
- Motorola
- Daskocil (Wilson Foods)

Bank of Oklahoma

February 1981 – June 1989

Oklahoma City, OK

After completing the credit-training program with this local bank, I began my career as an analyst in the Commercial Real Estate area. In 1983, I was promoted to lending officer within that department and remained there until 1985, when I transferred to the newly formed Special Assets area, which was created to resolve problem loans. I served as an account manager responsible for the resolution of commercial loans assigned to me as well as responsibility for the management and liquidation of foreclosed assets. I continued in that capacity until accepting the above referenced position with Hibernia Bank in New Orleans.

EDUCATION

- University Of Oklahoma, Norman Oklahoma
Bachelors of Business of Administration
- Robert Morris Associates Credit Training
Bank of Oklahoma

CERTIFICATIONS

- Certified Insolvency and Restructuring Advisor (“CIRA”)
Association of Insolvency and Restructuring Advisors

PRESENTATIONS

- Hazards in Foreclosure - RMA Tampa Chapter - 2010
- Successful Claims and Defenses to Lender Liability – New York Bar Association – 2010
- Emerging Trends in Lender Liability – Georgia Community Bankers - 2011
- Anatomy of a Workout – American Bar Association Business Law Section - 2013
- Lender Liability – Central Florida Turnaround Management Association - 2013
- Covenants, Representations & Warranties – RMA/UCF Advance Lending School - 2014
- Working with Loan Servicers and Lenders – Association of Insolvency and Restructuring Advisors National Conference – 2014

In addition to the above, since 2012 I have served as a member of the faculty of the Risk Management Associations "Advanced Commercial Lending School" held annually at the University of Central Florida, Orlando, FL. Course subject matter for which I have been responsible includes Commercial Loan Structuring, Covenant Compliance, Lender Liability and Problem Loan Resolution.

INVOLVEMENT

- Member, Association of Insolvency and Restructuring Advisors
- Member, Risk Management Association
- Instructor, RMA Advanced Lending School, University of Central Florida
- Former Board Member, United Way of Collier County
- Former President, Board of the Immokalee Friendship House
- Collier County Board of Commissioner's "Eastern Lands Committee", responsible for establishing development criteria for the rural section of Collier County

ENGAGEMENTS – EXPERT WITNESS

The following reflect appearances in which I have appeared as an Expert Witness, either by deposition or testimony at trial within the past four years. In no matter have I ever been disqualified as an expert.

Garcia, Et Al v McDaniel Reserve Holdings, LLC

Lee County District, FL

Evidence given by testimony

Issue: Testimony regarding availability of financing

Retained by: Plaintiff

Counsel: Andrea Shwayri, Greenberg Traurig, LLP

Branch Banking and Trust v Kraz, LLC

Case Number 10-CA-000304

Hillsborough County District Court

Evidence given by testimony

Issue: Interpretation of Loss Share Agreement; management of work out effort
Retained by: Defendant
Counsel: Jesse Ray, Jesse Ray Attorney at Law PC

First Atlantic Bank v Wells Fargo Bank, NA

Case Number 3:11-CV-00416-HES-JBT
US District Court, Middle District of Florida
Evidence given by Deposition
Issue: Representations and warranties in conjunction with loan sale agreement
Retained by: Defendant
Counsel: David Cannella, Carlton Fields, LLP

Poker Run Acquisition, Inc v Alvaro Gorrin Jr, Et Al

Case Number 08-36794 CA 03
Miami-Dade County Circuit Court
Evidence given by Testimony
Issue: Management of workout effort, communications with guarantors
Retained by: Defendant
Counsel: Alfonso J. Perez, Ranso Klock Reiniger Perez Esquenazi Vigil & Nieto

West Coast Investors, LLC v Tesoro Preserve Owners Association, Inc. et al

Case Number 12-01254-BKC-PGH
United States Bankruptcy Court – Southern District of Florida
Evidence given by Testimony
Issue: Impact of compulsory membership agreement on marketability of a Master Planned Community
Retained by: Defendant
Counsel: Luis Salezar, Salezar & Jackson PA

FKF-3, LLC, et al v John F. Magee, et al

Case Number 10-37137
United States Bankruptcy Court – Southern District of New York
Evidence given by Deposition
Issue: Fiduciary obligation of lender to investors
Retained by: Plaintiff
Counsel: Fred Stevens, Klestadt & Winters

Lehman Brothers Holdings, Inc. v. Universal American Mortgage Company, et al

Civil Action No. 13-CV-00092-WJM-BNB
US District Court for the District of Colorado
Evidence given by Deposition
Issue: Representations and Warranties in Loan Sales Agreement
Retained by: Defendant
Counsel: Philip Stein, Bilzin, Sumberg, Beana, Price and Axelrod, LLP

Metro Atlanta Task Force for the Homeless, Inc. v Emmanuel Fiakow, et al

Case Number 2010CV18770
Superior Court of Fulton County – State of Georgia
Evidence given by Deposition
Issue: Analysis of economic impact of Tax Credit financing
Retained by: Defendant
Counsel: Steve Riddell, Troutman Sanders

Aurora Bank, FSB v. Universal American Mortgage Company, et al

Civil Action No. 1:12-CV-02067-CMA-MJW
US District Court for the District of Colorado
Evidence given by Deposition
Issue: Representations and Warranties in Loan Sales Agreement
Retained by: Defendant
Counsel: Philip Stein, Bilzin, Sumberg, Beana, Price and Axelrod, LLP

West Airport Palms Business Park

Case No. 13-25728-BKC-RAM
United States Bankruptcy Court – Southern District of Florida
Evidence given by Testimony
Issue: Establishment of appropriate interest rate in light of Till decision
Retained by: Debtor
Counsel: Michael Seese, Seese PA

Glenn Garanto v U.S. Bank Trustee, et al

Civil Action File No 12-CV-101
Superior Court of Crawford County, Georgia
Evidence given by Deposition

Issue: Loan Servicing Standards

Retained by: Defendant

Counsel: Tracy Starr, Baker Donelson, Bearman, Caldwell & Berkowitz, PC

Biscaya Leucadendra Holdings, LLC v Christian Rodriguez, et al

Civil Action File No 12-CV-101

U.S. District Court for Miami/Dade County, Florida

Evidence given by Testimony

Issue: Loan Accounting/Reinstatement Calculations

Retained by: Defendant

Counsel: Christopher Spuches, Ehrenstein Charbonneau Calderin, PC

Caladonian v Fifth Third Bank

Case No 8:13-CV-1470-T-36TGW

U.S. District Court Middle District of Florida, Tampa, Florida

Evidence given by Testimony

Issue: Loan Underwriting Standards

Retained by: Defendant

Counsel: Robert Quinn, Carlton Fields LLP

Highlands Independent Bank v G. Perry Mason, et al

Case GC-12-881

Evidence given by Deposition

Issue: Loan Underwriting/Forensic Loan Review

Retained by: Defendant

Counsel: Robert Stok, Stok Folk & Kon

Piedmont/Maple, LLC et al v David Eichenblatt

Superior Court of Fulton County, Atlanta, GA

Civil Action File Number 2014CV253094

Evidence given by Deposition

Issue: Problem Loan Resolution

Retained by: Plaintiff

Counsel: Eric Taylor, Hunton Williams

Ginn Sur Mer, et al

US District Court for the Middle District of Florida

Case No. 3:08-cv-1012J-32JRK

Case No. 3:08-cv-1062-32JRK

Case No. 3:09-cv-516-J-32JRK

Case No. 3:10-cv-422-J-32JRK

Case No. 3:11-cv-199-J-32JRK

Case No. 3:12-cv-731-J-32JRK

Evidence given by Deposition

Issue: Loan Underwriting

Retained by: Defendant

Counsel: Stephen Katzenberg, Ballard Spahr

National Property, et al v Carroll SA

American Arbitration Association, Fulton County, GA

Case No. 01-16-0000-0045

Evidence given by Testimony

Issue: Operating Agreement Dispute

Retained by: Claimant

Counsel: Simon Malko, Morris Manning & Martin

Oak Rock Financial, LLC v Israael Discount Bank, et al

United States Bankruptcy Court, Eastern District of New York

Case No. 01-16-0000-0045

Evidence given by Deposition

Issue: Lending Standards

Retained by: Defendant

Counsel: Adam Silverstein, Otterbourg LLC

Lutgert et al v Ezon et al

Circuit Court for Collier Count, FL

Case No. 14-CA-477

Evidence given by Deposition

Issue: Business Review of Retail Developer

Retained by: Plaintiff

Counsel: Lee Stapleton, KL Gates