

Fifth Interim Financial Update

4/1/2023 Through 4/30/2023



Debtor Name: *FTX Trading Ltd. et al.*
Lead Case #: 22-11068 (JTD)
Petition Dates: 11/11/2022 & 11/14/2022
Report Period Ending: 4/30/23
Months Pending: 6
Industry Classification: 5239



Contents

- I. Interim Financial Update Cover Page

- II. Cash Update

- III. Assets Sold or Transferred (as applicable)

- IV. Professional Fees & Expenses

- V. Summary of Taxes Paid

- VI. Questionnaire



I. Interim Financial Update Cover Page

The Debtors are filing this report based on the best available information to provide interim disclosures until such time as monthly operating reports are filed. While the Debtors have made reasonable efforts to completely and accurately report the listed information, until such time as the monthly operating reports are filed, the Debtors are unable to completely certify the accuracy of the reported information.

The Debtors maintain accounts in foreign currencies across numerous entities. Balances presented are translated at the applicable rate. Period end cash balances are translated at the month-end rate and disbursements are translated using the applicable rate for the date of the disbursement. All amounts presented are in US Dollars, unless otherwise stated.

FTX Trading Ltd. Case No. 22-11068 (JTD)	
Lead Case	FTX Trading Ltd. et al.
Petition Dates	11/11/2022, 11/14/2022
Report Period Ending	4/30/2023
Months Pending	6
Industry Classification	5239
Reporting Method	Accrual
Debtors' Full Time Employees (Current)	107
Debtors' Full-Time Employees (as of Petition Date)	320



II. Cash Update – Disbursements thru 4/30⁽¹⁾

Disbursements by Silo	April 2023
WRS	\$ 38,715,534
Ventures	2,244,343
Dotcom	2,016,352
Alameda	783,191
No Silo (Deck Technologies Inc.)	270,106
Total Debtor Disbursements	\$ 44,029,526

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – Alameda

Case No.	Debtor Name	Silo	April 2023
22-11066	Alameda Research LLC	Alameda	\$ 572,505
22-11158	Ledger Prime LLC	Alameda	168,612
22-11106	Alameda Research KK	Alameda	31,656
22-11105	Alameda Research (Bahamas) Ltd	Alameda	6,243
22-11087	Maclaurin Investments Ltd	Alameda	2,250
22-11160	North Dimension Ltd	Alameda	1,925
22-11081	Atlantis Technology Ltd	Alameda	-
22-11112	Cottonwood Grove Ltd	Alameda	-
22-11067	Alameda Research Ltd	Alameda	-
22-11109	Alameda TR Systems S de RL	Alameda	-
22-11177	LedgerPrime Bitcoin Yield Enhancement Fund, LLC	Alameda	-
22-11069	Alameda Research Holdings Inc.	Alameda	-
22-11078	Alameda TR Ltd	Alameda	-
22-11083	Blue Ridge Ltd	Alameda	-
22-11084	Cardinal Ventures Ltd	Alameda	-
22-11085	Cedar Bay Ltd	Alameda	-
22-11104	Alameda Aus Pty Ltd	Alameda	-
22-11107	Alameda Research Pte Ltd	Alameda	-
22-11108	Alameda Research Yankari Ltd	Alameda	-
22-11126	Goodman Investments Ltd	Alameda	-
22-11131	Killarney Lake Investments Ltd	Alameda	-
22-11134	Alameda Global Services Ltd	Alameda	-
22-11136	Cottonwood Technologies Ltd	Alameda	-
22-11141	Euclid Way Ltd	Alameda	-
22-11150	Hive Empire Trading Pty Ltd	Alameda	-
22-11175	Hannam Group Inc	Alameda	-

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – Alameda

Case No.	Debtor Name	Silo	April 2023
22-11155	LedgerPrime Bitcoin Yield Enhancement Master Fund LP	Alameda	-
22-11156	LedgerPrime Digital Asset Opportunities Fund, LLC	Alameda	-
22-11157	LedgerPrime Digital Asset Opportunities Master Fund LP	Alameda	-
22-11159	LedgerPrime Ventures, LP	Alameda	-
22-11153	North Dimension Inc	Alameda	-
22-11154	North Wireless Dimension Inc	Alameda	-
22-11094	Strategy Ark Collective Ltd	Alameda	-
22-11096	Verdant Canyon Capital LLC	Alameda	-
Total Alameda Silo Disbursements ⁽¹⁾			\$ 783,191

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – Dotcom

Case No.	Debtor Name	Silo	April 2023
22-11068	FTX Trading Ltd	Dotcom	\$ 838,550
22-11102	FTX Japan KK	Dotcom	620,392
22-11110	Blockfolio, Inc	Dotcom	179,137
22-11166	FTX EU Ltd	Dotcom	155,524
22-11075	FTX Europe AG	Dotcom	142,119
22-11161	Quoine Pte Ltd	Dotcom	27,380
22-11100	FTX Exchange FZE	Dotcom	19,533
22-11132	Zubr Exchange Ltd	Dotcom	9,668
22-11165	FTX Crypto Services Ltd	Dotcom	6,992
22-11169	FTX Switzerland GmbH	Dotcom	4,131
22-11092	Quoine Vietnam Co	Dotcom	4,079
22-11164	FTX Certificates GmbH	Dotcom	3,257
22-11074	FTX Japan Holdings KK	Dotcom	3,097
22-11123	FTX Trading GmbH	Dotcom	862
22-11103	FTX Japan Services KK	Dotcom	310
22-11113	Crypto Bahamas LLC	Dotcom	308
22-11118	FTX Digital Holdings (Singapore) Pte Ltd	Dotcom	249
22-11076	FTX Property Holdings Ltd	Dotcom	227
22-11128	Innovatia Ltd	Dotcom	227
22-11119	FTX Products (Singapore) Pte Ltd	Dotcom	218
22-11173	GG Trading Terminal Ltd	Dotcom	93
22-11082	Bancroft Way Ltd	Dotcom	-
22-11145	FTX EMEA Ltd	Dotcom	-
22-11114	Deep Creek Ltd	Dotcom	-

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – Dotcom

Case No.	Debtor Name	Silo	April 2023
22-11116	FTX (Gibraltar) Ltd	Dotcom	-
22-11099	FTX Equity Record Holdings Ltd	Dotcom	-
22-11117	FTX Canada Inc	Dotcom	-
22-11101	FTX Hong Kong Ltd	Dotcom	-
22-11080	Analisyia Pte Ltd	Dotcom	-
22-11122	FTX Structured Products AG	Dotcom	-
22-11079	Allston Way Ltd	Dotcom	-
22-11163	DAAG Trading, DMCC	Dotcom	-
22-11124	FTX Zuma Ltd	Dotcom	-
22-11120	FTX Services Solutions Ltd	Dotcom	-
22-11091	Quoine India Pte Ltd	Dotcom	-
22-11125	Global Compass Dynamics Ltd	Dotcom	-
22-11151	Liquid Financial USA Inc	Dotcom	-
22-11086	Liquid Securities Singapore Pte Ltd	Dotcom	-
22-11152	LiquidEX LLC	Dotcom	-
22-11077	LT Baskets Ltd	Dotcom	-
22-11088	Mangrove Cay Ltd	Dotcom	-
22-11095	Technology Services Bahamas Limited	Dotcom	-
22-11097	West Innovative Barista Ltd	Dotcom	-
22-11098	Western Concord Enterprises Ltd	Dotcom	-
Total Dotcom Silo Disbursements ⁽¹⁾			\$ 2,016,352

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – WRS

Case No.	Debtor Name	Silo	April 2023
22-11183	West Realm Shires Inc	WRS	\$ 38,010,739
22-11071	West Realm Shires Services Inc.	WRS	701,327
22-11174	Good Luck Games, LLC	WRS	1,608
22-11167	FTX Lend Inc	WRS	1,019
22-11072	West Realm Shires Financial Services Inc	WRS	461
22-11115	Digital Custody Inc	WRS	142
22-11127	Hawaii Digital Assets Inc	WRS	93
22-11143	FTX Digital Assets LLC	WRS	46
22-11073	Ledger Holdings Inc	WRS	25
22-11168	FTX Marketplace, Inc	WRS	25
22-11171	FTX US Services, Inc	WRS	25
22-11149	FTX US Trading, Inc	WRS	25
22-11090	Pioneer Street Inc	WRS	-
Total WRS Silo Disbursements ⁽¹⁾			\$ 38,715,534

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – Ventures

Case No.	Debtor Name	Silo	April 2023
22-11089	Paper Bird Inc	Ventures	\$ 2,193,316
22-11070	Clifton Bay Investments LLC	Ventures	50,000
22-11176	Hilltop Technology Services LLC	Ventures	800
22-11129	Island Bay Ventures Inc	Ventures	134
22-11172	FTX Ventures Ltd	Ventures	93
22-11162	Cedar Grove Technology Services, Ltd	Ventures	-
22-11111	Clifton Bay Investments Ltd	Ventures	-
Total Venture Silo Disbursements ⁽¹⁾			\$ 2,244,343

(1) Disbursements are converted into USD at the time of payment



II. Disbursements thru 4/30⁽¹⁾ – Not Siloed

Case No.	Debtor Name	Silo	April 2023
22-11139	Deck Technologies Inc	None	\$ 270,106
22-11138	Deck Technologies Holdings LLC	None	-
Total Not Siloed Entities Disbursements ⁽¹⁾			\$ 270,106

(1) Disbursements are converted into USD at the time of payment



II. Cash Update – Bank Balances as of 4/30

Debtor Bank Account Balances as of April 30, 2023

Cash Balances by Silo	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
Debtor Accounts				
Alameda	\$ 847,686,486	\$ 29,601,789	\$ -	\$ 877,288,276
WRS	574,257,603	24,759,305	-	599,016,909
Dotcom	297,692,790	106,302,547	4,000,000	407,995,338
Ventures	154,557,262	-	-	154,557,262
Not Siloed ⁽²⁾	144,204	-	-	144,204
Total Debtor Accounts	\$ 1,874,338,346	\$ 160,663,642	\$ 4,000,000	\$ 2,039,001,988

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein

(2) Represents bank account at Deck Technologies, Inc., a Debtor entity that is not in a Silo



II. Cash Update – Bank Balances as of 4/30

Alameda Debtor Bank Account Balances as of April 30, 2023				
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
Alameda Research LLC	\$ 830,766,425	\$ 635	\$ -	\$ 830,767,060
Alameda Research Ltd	-	28,050,279	-	28,050,279
Alameda Research KK	15,791,227	-	-	15,791,227
North Dimension Inc	-	1,550,875	-	1,550,875
Maclaurin Investments Ltd.	1,121,127	-	-	1,121,127
Cottonwood Grove Ltd	7,708	-	-	7,708
Ledger Prime LLC	-	-	-	-
LedgerPrime Digital Asset Opportunities Master Fund LP	-	-	-	-
LedgerPrime Digital Asset Opportunities Fund, LLC	-	-	-	-
Hive Empire Trading Pty Ltd	-	-	-	-
Goodman Investments Ltd.	-	-	-	-
Alameda Aus Pty Ltd	-	-	-	-
Alameda Global Services Ltd	-	-	-	-
Alameda Research (Bahamas) Ltd	-	-	-	-
Alameda Research Holdings Inc.	-	-	-	-
Alameda Research Pte Ltd	-	-	-	-

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

Alameda Debtor Bank Account Balances as of April 30, 2023				
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
Alameda Research Yankari Ltd	\$ -	\$ -	\$ -	\$ -
Alameda TR Ltd	-	-	-	-
Alameda TR Systems S de RL	-	-	-	-
Atlantis Technology Ltd	-	-	-	-
Blue Ridge Ltd	-	-	-	-
Cardinal Ventures Ltd	-	-	-	-
Cedar Bay Ltd	-	-	-	-
Cottonwood Technologies Ltd	-	-	-	-
Euclid Way Ltd	-	-	-	-
Hannam Group Inc	-	-	-	-
Killarney Lake Investments Ltd	-	-	-	-
LedgerPrime Bitcoin Yield Enhancement Fund, LLC	-	-	-	-
LedgerPrime Bitcoin Yield Enhancement Master Fund LP	-	-	-	-
LedgerPrime Ventures, LP	-	-	-	-
North Dimension Ltd	-	-	-	-
North Wireless Dimension Inc	-	-	-	-

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

Alameda Debtor Bank Account Balances as of April 30, 2023						
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash		
Strategy Ark Collective Ltd	\$ -	\$ -	\$ -	\$ -		
Verdant Canyon Capital LLC	-	-	-	-		
Total Alameda Debtor Accounts	\$ 847,686,486	\$ 29,601,789	\$ -	\$ 877,288,276		

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

FTX Japan K.K.

Dotcom Debtor Bank Account Balances as of April 30, 2023

Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
FTX Trading Ltd	\$ 166,765,095	\$ 26,928,001	\$ -	\$ 193,693,096
FTX Japan K.K.	114,395,229	20,778,967	-	135,174,197
FTX EU Ltd	1,336,173	51,301,496	-	52,637,669
Quoine Pte Ltd	1,601,353	7,294,083	-	8,895,436
FTX Europe AG	6,656,311	-	-	6,656,311
FTX Exchange FZE	720,809	-	4,000,000	4,720,809
Quoine India Pte Ltd	3,244,995	-	-	3,244,995
Zubr Exchange Ltd	859,499	-	-	859,499
FTX Japan Services KK	776,697	-	-	776,697
FTX Japan Holdings K.K.	417,705	-	-	417,705
Quoine Vietnam Co. Ltd	332,957	-	-	332,957
FTX Digital Holdings (Singapore) Pte Ltd	258,882	-	-	258,882
FTX Crypto Services Ltd.	215,267	-	-	215,267
FTX Trading GmbH	62,631	-	-	62,631
Innovatia Ltd	39,844	-	-	39,844

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

Dotcom Debtor Bank Account Balances as of April 30, 2023				
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
FTX Switzerland GmbH	\$ 9,468	\$ -	\$ -	\$ 9,468
Blockfolio, Inc.	(125)	-	-	(125)
Crypto Bahamas LLC	-	-	-	-
Liquid Securities Singapore Pte Ltd	-	-	-	-
FTX Property Holdings, Ltd	-	-	-	-
FTX Services Solutions Ltd	-	-	-	-
FTX Structured Products AG	-	-	-	-
FTX Certificates GmbH	-	-	-	-
Allston Way Ltd	-	-	-	-
Analysya Pte Ltd	-	-	-	-
Bancroft Way Ltd	-	-	-	-
DAAG Trading, DMCC	-	-	-	-
Deep Creek Ltd	-	-	-	-
FTX (Gibraltar) Ltd	-	-	-	-
FTX Canada Inc	-	-	-	-
FTX EMEA Ltd	-	-	-	-

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

Dotcom Debtor Bank Account Balances as of April 30, 2023				
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
FTX Equity Record Holdings Ltd	\$ -	\$ -	\$ -	\$ -
FTX Hong Kong Ltd	-	-	-	-
FTX Products (Singapore) Pte Ltd	-	-	-	-
FTX Zuma Ltd	-	-	-	-
GG Trading Terminal Ltd	-	-	-	-
Global Compass Dynamics Ltd	-	-	-	-
Liquid Financial USA Inc	-	-	-	-
LiquidEX LLC	-	-	-	-
LT Baskets Ltd	-	-	-	-
Mangrove Cay Ltd	-	-	-	-
Technology Services Bahamas Limited	-	-	-	-
West Innovative Barista Ltd	-	-	-	-
Western Concord Enterprises Ltd	-	-	-	-
Total Dotcom Debtor Accounts	\$ 297,692,790	\$ 106,302,547	\$ 4,000,000	\$ 407,995,338

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

Cash Balances by Entity	WRS Debtor Bank Account Balances as of April 30, 2023			
	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
West Realm Shires Inc.	\$ 574,257,650	\$ -	\$ -	\$ 574,257,650
West Realm Shires Services Inc.	-	24,759,305	-	24,759,305
FTX Digital Assets LLC	(46)	-	-	(46)
Ledger Holdings Inc.	-	-	-	-
Digital Custody Inc.	-	-	-	-
FTX Lend Inc.	-	-	-	-
Good Luck Games, LLC	-	-	-	-
Hawaii Digital Assets Inc.	-	-	-	-
West Realm Shires Financial Services Inc.	-	-	-	-
FTX Marketplace, Inc	-	-	-	-
FTX US Services, Inc	-	-	-	-
FTX US Trading, Inc	-	-	-	-
Pioneer Street Inc	-	-	-	-
Total WRS Debtor Accounts	\$ 574,257,603	\$ 24,759,305	\$ -	\$ 599,016,909

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

Ventures Debtor Bank Account Balances as of April 30, 2023				
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash
Clifton Bay Investments LLC	\$ 154,557,262	\$ -	\$ -	\$ 154,557,262
FTX Ventures Ltd	-	-	-	-
Paper Bird Inc	-	-	-	-
Clifton Bay Investments Ltd	-	-	-	-
Cedar Grove Technology Services, Ltd	-	-	-	-
Island Bay Ventures Inc	-	-	-	-
Total Ventures Debtor Accounts	\$ 154,557,262	\$ -	\$ -	\$ 154,557,262

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



II. Cash Update – Bank Balances as of 4/30

		Not Siloed Debtor Bank Account Balances as of April 30, 2023				
Cash Balances by Entity	Unrestricted	Custodial ⁽¹⁾	Other Restricted	Total Cash		
Deck Technologies Inc.	\$ 144,204	\$ -	\$ -	\$ 144,204		
Deck Technologies Holdings LLC	-	-	-	-		
Total Not Siloed Debtor Accounts	\$ 144,204	\$ -	\$ -	\$ 144,204		

(1) Classification of custodial accounts is still under review and does not imply that any customer has an interest herein



III. Assets Sold or Transferred

Through April 2023, assets were sold or transferred outside of ordinary course of business as outlined below

Case No.	Debtor Name	Sale Date	Description of Assets Sold	Gross Sale Price	Payments to Third Parties	Net Sale Proceeds
22-11172	FTX Ventures Ltd	4/13/2023	Sale of equity/token position in Mysten Labs / SUI Tokens	\$ 96,250,000	\$ -	\$ 96,250,000
22-11087	Maclaurin Investments Ltd.	4/25/2023	Sale of fund position in VY Space II, L.P.	8,371,524	-	8,371,524
22-11172	FTX Ventures Ltd	4/3/2023	Sale of equity position in Keygen Labs, Inc.	500,000	-	500,000
22-11070	Clifton Bay Investments LLC	4/21/2023	Sale of equity position in Anysphere Inc	200,000	-	200,000
				\$ 105,321,524		\$105,321,524



IV. Professional Fees & Expenses

Through April 2023, retained professional fees were approved and paid as outlined below

Debtor's Professional Fees and Expenses (Bankruptcy)

Firm Name	Role	Approved Current Month ⁽¹⁾	Approved Cumulative	Paid Current Month ⁽²⁾	Paid Cumulative
Sullivan & Cromwell LLP	Restructuring Counsel	\$ 10,843,086	\$ 44,560,760	\$ 10,843,086	\$ 39,589,099
Alvarez & Marsal North America, LLC	Financial Advisor	9,784,554	32,707,399	9,784,554	32,707,399
Perella Weinberg Partners LP	Investment Banker	527,892	2,640,312	527,892	2,640,312
AlixPartners, LLP	Forensic Inv. Consultant	2,407,854	5,012,603	2,407,854	5,012,603
RLKS Executive Solutions LLC	Chief Officers	1,474,233	4,782,524	1,474,233	4,782,524
Paul Hastings LLP	UCC Counsel	3,347,202	4,456,548	3,347,202	4,456,548
Quinn Emanuel Urquhart & Sullivan, LLP	Special Counsel	-	2,387,611	-	2,387,611
Landis Rath & Cobb LLP	Restructuring Co-Counsel	476,605	1,968,416	476,605	1,968,416
Owl Hill Advisory, LLC	Chief Executive Officer	329,173	1,686,498	329,173	1,686,498
FTI Consulting, Inc.	UCC Financial Advisor	1,460,264	1,608,341	1,460,264	1,608,341
Kroll Restructuring Administration LLC - 156(c)	Claims & Noticing Agent	439,670	1,581,289	857,732	1,581,289
Ernst & Young LLP	Tax Services Provider	-	1,023,622	1,023,622	1,023,622
Jefferies LLC	UCC Investment Banker	389,665	389,665	389,665	389,665
Young Conaway Stargatt & Taylor, LLP	UCC Local Counsel	201,415	257,149	201,415	257,149
	Aggregate Total	\$ 31,681,613	\$ 105,062,737	\$ 33,123,296	\$ 100,091,076

(1) Fees reflect amounts filed in monthly fee statements and approved on an interim basis, subject to final approval

(2) Paid fees do not include the application of any retainer



V. Summary of Taxes Paid⁽¹⁾

Consolidated Taxes Paid Across All Silos	April 2023
Postpetition income taxes paid (local, state, and federal)	-
Postpetition employer payroll taxes paid	320,391
Postpetition property taxes paid	-
Postpetition other taxes paid (foreign, local, state, and federal)	65,642
Total Postpetition Taxes Paid	\$386,033

(1) Disbursements are converted into USD at the time of payment



VI. Questionnaire

FTX Trading Ltd. Case No. 22-11068 (JTD)

Were any payments made on prepetition debts ⁽¹⁾ ?	Yes
Were any payments made outside the ordinary course of business without court approval?	No
Were any payments made to or on behalf of insiders?	Yes ⁽²⁾
Are you current on postpetition tax return filings?	Yes
Are you current on postpetition estimated tax payments?	Yes
Were all trust fund taxes remitted on a current basis?	Yes
Was there any postpetition borrowing, other than trade credit?	No
Were all payments made to or on behalf of professionals approved by the court?	Yes
Do the Debtors Have:	
Worker's compensation insurance? ⁽³⁾	Yes
If yes, are the premiums current?	Yes
Casualty/property insurance? ⁽³⁾	Yes
If yes, are the premiums current?	Yes
General liability insurance? ⁽³⁾	Yes
If yes, are the premiums current?	Yes
Has a plan of reorganization been filed with the court?	No
Has a disclosure statement been filed with the court?	No
Are the Debtors current with quarterly U.S. Trustee fees as set forth under 28 U.S.C. § 1930?	Yes

(1) Certain prepetition payments were made in accordance with bankruptcy court orders allowing such payments

(2) Insider payments were made in the ordinary course of business and do not include any payments to the founders or their relatives

(3) Insurance is being evaluated across the entities and deficiencies are being addressed where identified