

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE	:
COMMISSION,	:
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Plaintiff,	:
	:
-v-	:
	:
PLATINUM MANAGEMENT (NY) LLC;	:
PLATINUM CREDIT MANAGEMENT, L.P.;	:
MARK NORDLICHT;	:
DAVID LEVY;	:
DANIEL SMALL;	:
URI LANDESMAN;	:
JOSEPH MANN;	:
JOSEPH SANFILIPPO; and	:
JEFFREY SHULSE,	:
	:
Defendants.	:
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No. 16-cv-6848 (BMC)

SUPPLEMENTAL DECLARATION OF MELANIE L. CYGANOWSKI

I, Melanie L. Cyganowski, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am a member of the law firm of Otterbourg P.C. (“Otterbourg”) and the Court-appointed Receiver in the above-captioned action. I make this supplemental declaration on behalf of myself as Receiver and on behalf of Otterbourg, which was previously retained as my counsel in this action. [Dkt. No. 231] Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

2. On or about October 11, 2018, in connection with research into a claim by one of the above-captioned defendants for reimbursement of legal fees in this and the related criminal action, I asked Platinum staff to investigate payments by Platinum for legal fees. As a result of this investigation, I learned of a payment in the amount of \$7,000 made by Centurion Credit

Group LLC (“Centurion”) to Otterbourg in October 2010. This payment was made on behalf of Titan Trade Finance LLC (“Titan”) with respect to Otterbourg’s retention by Titan in November 2009 for the limited purpose of preparing certain form documentation for purchase order financing transactions for a business that Titan was considering entering into, but ultimately did not pursue. Otterbourg completed all work on behalf of Titan by January 2010. Titan is a subsidiary of Alpha Credit Strategies which, in turn, is a subsidiary of Centurion, which made the payment on behalf of Titan. Titan does not appear on the docket in this case, nor did it appear on the list of related parties provided to us by the SEC at the time that we conducted a conflict check at the beginning of the case. Neither of the two attorneys that billed to the Titan matter has worked on the Platinum Receivership case. I respectfully represent that this is not a conflict of interest, but I, nonetheless, thought it appropriate to disclose this fact.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of October, 2018, at New York, NY.

/s/ *Melanie L. Cyganowski*
Melanie L. Cyganowski