

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
COLLIER COUNTY FLORIDA**

File No.: 22-CP-3062

IN RE:

ESTATE OF LYNN E. BAKER

AMENDED STATEMENT OF CLAIM FOR MATTHEW TURNBULL

Matthew Turnbull (“Claimant”) by and through undersigned counsel hereby presents his amended claim for filing against the above- referenced Estate, in place of the existing claim, and states as follows:

1. Claimant invested funds in Advisors Equity, LLC after reviewing various documents provided to him by Decedent, including a private placement memorandum and a subscription booklet (collectively the “Securities Disclosure Documents”).
2. Claimant signed contracts with Advisors Equity, LLC including a subscription agreement (“Contracts”).
3. The Decedent, Lynn E. Baker, was at all relevant times the sole person in total control of Advisors Equity, LLC.
4. Since investing funds in Advisors Equity, LLC, Claimant has not received adequate documentation reflecting that his investment was handled consistently with the Securities Disclosure Documents and Contracts, nor has he received any periodic reporting on his investment, nor has he received any tax disclosure documents.

5. At present, Claimant has no idea whether his investment in Advisors Equity, LLC was invested properly and consistently with the Securities Disclosure Documents and Contracts.
6. Given the complete lack of required reporting, Claimant may have claims against this Estate, as follows:
 - a. To the extent that the Decedent failed to actually place the invested funds into Advisors Equity, LLC, Claimant has claims against the Estate including but not limited to theft, conversion, breach of contract and securities fraud.
 - b. To the extent Decedent took money or property from Advisors Equity, LLC, that he was not permitted to and such harmed Claimant, Claimant has claims against the Estate including but not limited to embezzlement, breach of contract, and securities fraud.
 - c. To the extent that Decedent mismanaged Claimant's investment in Advisors Equity, LLC, Claimant has claims against the Estate including but not limited to negligence, breach of contract, and securities fraud.
 - d. To the extent that Decedent, through Advisors Equity, LLC invested a portion of Claimant's money in companies for which Decedent failed to perform adequate due diligence, Claimant has claims against the Estate including but not limited to negligence, fraud, breach of contract, and securities fraud.
 - e. To the extent that Claimant has filed incorrect tax returns based on the failure of Advisors Equity, LLC to provide tax disclosure documentation, Claimant has a claim against the Estate for penalties and interest under negligence and other theories.

- f. Given how the Decedent mismanaged Advisors Equity, LLC, Claimant has a claim against the Estate for disgorgement of all fees paid to Decedent based on Claimant's investment.
 - g. The failure of Decedent to have a succession plan at Advisors Equity, LLC, as well as his complete failure to provide adequate information to Claimant before his death, has caused Claimant to incur legal and other expenses to have his investment properly handled. Such expenses are recoverable under various theories, including but not limited to breach of contract, fraud, negligence, and securities fraud.
7. The claims seeking damages for the amount invested are liquidated, and all other claims are nonliquidated.
 8. Claims set forth in paragraphs a-e are contingent. All other claims are not contingent.
 9. Although the claims do not have recorded security interests underlying them, the claims might be secured in other unknown ways.

I, Matthew Turnbull, under penalties of perjury, do hereby declare that I have read the foregoing and the facts stated herein are true to the best of my knowledge. All communications should be directed through my attorney of record.

Matthew Turnbull

03/09/2023

Matthew Turnbull, Claimant

Date

/s/ Jeffrey Howard Skatoff, Esq. /s/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, a true and correct copy of the foregoing has been served via the Florida Courts E-Filing Portal on all persons so appearing.

/s/ Jeffrey Howard Skatoff, Esq. /s/
JEFFREY H. SKATOFF, ESQ.
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