

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

_____ /

STATEMENT OF CLAIM FOR VIJAY VALLABHANENI

Mr. Vijay Vallabhaneni ("Claimant") hereby presents this claim for filing against the above-referenced Estate, and states as follows:

1. Claimant invested funds in Advisors Equity, LLC totalling **\$50,000** (US Dollars Fifty thousand), after reviewing various documents provided to him and direct communication with the "Decedent", Lynn E. Baker, including a private placement memorandum and a subscription booklet (collectively the "Securities Disclosure Documents")
2. The Decedent, Lynn E. Baker, was at all relevant times the sole person in total control of Advisors Equity, LLC
3. The Decedent confirmed these funds will be part of Series B-SX Fund and part of a \$110 Million Syndicate with sole purpose to acquire the private stock of the Company named SpaceX
4. Claimant will furnish copies of communication and payment acknowledgement from the Decedent assuring the genuine and agreed target for the investment
5. 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
6. At present, Claimant has no visibility on whether his investment in Advisors Equity, LLC was invested properly and in accordance with the Securities Disclosure Documents and Contracts
7. 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 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, 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 Advisor's Equity, LLC, as well as his complete failure to provide adequate information to Claimant before his death, will cause Claimant to incur legal and other expenses to have his investment properly handled. Such expenses are recoverable under various aspects, including but not limited to breach of contract, fraud, negligence, and securities fraud
8. Claims set forth in paragraphs a-e are contingent
9. The claims seeking damages for the amount invested are liquidated, and all other claims are nonliquidated
10. Although the claims do not have recorded security interests underlying them, the claims might be secured in other unknown ways

I, Mr. Vijay Vallabhaneni, under penalties of perjury, do hereby declare that the facts stated herein are true to the best of my knowledge.

 Vijay Vallabhaneni

Mr. Vijay Vallabhaneni, Claimant

34 Dover House Road, London, UK SW15 5AU

Mobile: +44-7515032623

 03/13/2023

Date

Note: I haven't engaged an Attorney solely for the purpose of preparing and submitting this claim. I have put together in the above similar format probably familiar to you. If any gap in presentation kindly give me an opportunity to present myself.

Note: Below are the relevant evidence



Re: Decision
From: Ed Baker (ed.iamcllc@gmail.com)
To: vijayvallabh@yahoo.com
Date: Friday, 19 February 2021 at 17:18 GMT
Vijay, you did the accredited portion in the Subscription agreement.

You just need to do the wire transfer.

Thanks,

Ed

On Fri, Feb 19, 2021, 12:02 PM Vijay Vallabhaneni <vijayvallabh@yahoo.com> wrote:

Hi Ed, really sorry for holding you up. We are very hopeful of this opportunity and decided to proceed in investing in B-SX Fund.

So the next step would be to 1. self declare Investor status (any particular form)? 2. Wire the funds as per instructions given by you a couple of days ago.

Pls. suggest.

Thanks,
Vijay Vallabhaneni

On Friday, February 19, 2021, 3:55 pm, Ed Baker <ed.iamcllc@gmail.com> wrote:

Hello Vijay.

Please confirm today what you and your spouse decided, so I can include you in this Tranche of the Series B-SX Fund.

Best regards,

Ed

On Thu, Feb 18, 2021 at 4:05 PM Vijay Vallabhaneni <vijayvallabh@yahoo.com> wrote:

Thanks Ed. I will get back in an hour or two at most. Just need to discuss with the missus and finalise.

Thanks,
Vijay Vallabhaneni

On Thursday, February 18, 2021, 7:55 pm, Ed Baker <ed.iamcllc@gmail.com> wrote:

Vijay, you did not miss the earlier price last quarter because, one, we did not know each other and, two, our Fund was not available to you at the time. The Tender is at \$420 per share and the secondary market will be around the price. Our source is acquiring the stock from one of the two sources.



Transfer confirmation

Transfer created February 26, 2021 14:56:40 GMT	Funded February 27, 2021 12:24:35 GMT
Paid out March 01, 2021	Transfer #220705779
Membership P19623067	

Your details

Name Vijay Vallabhaneni	Address 34 Dover House Road London, Sw155au United Kingdom
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Transfer overview

Amount paid by Vijay Vallabhaneni
35,939.41 GBP

Fee
Conversion 126.11 GBP

Total fees (included) 126.11 GBP

Amount converted
35,813.30 GBP

Exchange rate
1 GBP = 1.395850 USD

Converted and sent to Advisors Equity LLC
Series B Fund
49,990.00 USD

Sent to

Name
Advisors Equity LLC Series B Fund

Reference
VijayValla

Account details
BANKVISTA
035004542
091917050

Address
5965 Ashford Ln
Naples, 34110
Florida, United States



Paid out from

Name

TransferWise Ltd on behalf of Vijay
Vallabhaneni

Trace Id

091000012597544

Banking partner

Wells Fargo Bank



Transfer overview

Amount paid by Vijay Vallabhaneni
10.00 GBP

Fee
Conversion 0.79 GBP

Total fees (included) 0.79 GBP

Amount converted
9.21 GBP

Exchange rate
1 GBP = 1.410850 USD

Converted and sent to Advisors Equity LLC
Series B Fund
12.99 USD

Sent to

Name
Advisors Equity LLC Series B Fund

Reference
VijayValla

Account details
BANKVISTA
035004542
091917050

Address
5965 Ashford Ln
Naples, 34110
Florida, United States



Transfer

From:Ed Baker (ed.iamcllc@gmail.com)

To:vijayvallabh@yahoo.com

Date:Monday, 1 March 2021 at 13:27 GMT

Vijay, this is confirmation we have received your \$50,000 transfer, spit between the amount below and the amount received last Friday.

Best,

Ed

Mar 01, 2021

Vijay Vallabhaneni VijayValla XXXXX7544

49,990.00

Series B-SX Closing
From: Ed Baker (ed.iamcllc@gmail.com)
To: edward@aefunds.vc
Bcc: vijayvallabh@yahoo.com
Date: Tuesday, 9 March 2021 at 18:10 GMT
Congratulations!

You are receiving this email as an investor in the recently closed Advisors Equity Series B-SX Fund (the "Fund").

Your investment in the Fund provides you exclusive access to the secondary market purchase of **SpaceX** stock.

Our Series B-SX Fund is participating via subscription commitment in a **\$110 Million** Syndicate, made up of many private equity funds.

*The sole purpose of the Syndicate is to acquire the private stock of **SpaceX**.*

BACKGROUND:

SpaceX has doubled in valuation over the last 12 months. There is incredible demand for a low supply of secondary stock. Participating in a large Syndicate is about the only opportunity to purchase the **SpaceX** stock today.

Our Syndicate last purchased **SpaceX** stock on January 4, 2021 at **\$311** per share. Expectations were the market price would be around **\$350** per share.

However, the company, **SpaceX** recently set a price of **\$419.99** per share, rounded to **\$420** per share, for their recent Tender Offering. Essentially, the company has set the secondary market price.

ACQUISITION OF THE SPACEX STOCK:

The Syndicate Manager feels strongly, with the recent volatility this will bring other sellers-out to sell some of their older **SpaceX** portfolio shares, as they are already commencing negotiations with these sellers. They are also negotiating with their sources of two Tender Offering buyers who are selling the shares.

This is the status of Syndicate negotiations as of today.

The Syndicate will get filled in **SpaceX** stock, but as they have advised, we need patience to realize the best opportunity for the Syndicate to purchase the shares.

The Syndicate, which means the Fund will get filled in **SpaceX** stock. We will keep you posted as the Syndicate proceeds with the **SpaceX** stock acquisition.

Again, congratulations on your participation in the Series B-SX Fund, which provides you the exclusive access to acquire the **SpaceX** private stock via the Fund through the Syndicate.

Best regards

Edward Baker
Fund Manager



Series B-SX Cap Table and Capital Account

From:Ed Baker (ed.iamcllc@gmail.com)

To:vijayvallabh@yahoo.com

Date:Tuesday, 25 May 2021 at 17:11 BST

Vijay, attached are the following documents in 1 PDF:

1. The Fund Cap Table (capitalization totals of the Fund) for the "**Closed**" Advisors Equity LLC - Series B-SX Fund
2. A list of all the investors with no-names, their respective investment amounts and equity %, .All investors total 100% equity ownership of the Fund assets.
3. Your personal Capital Account.

Please let me know if you have any questions. Please advise if the amounts are different from your records.

Best,

Ed



**Advisors Equity LLC
Series B-SX Fund**

31-Mar-21

**Capital Account
for
Vijay Vallabhaneni**

<u>#</u>	<u>Name</u>	<u>Capital Account</u>	<u># of LLC Units</u>	<u>% of Equity</u>	<u>Date</u>
1					
2					
3					
4					
5					
7					
8	Vijay Vallabhaneni	\$ 50,000	3,125	0.53%	3/1/2021
9					
10					
11					
12					
Totals		\$ 7,706,976	591,586	100.00%	