

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 JAMES ALLARD

James Allard (“Claimant”) by and for himself hereby presents his claim for filing against the above- referenced Estate, and states as follows:

1. Claimant invested funds in Advisors Equity, LLC, Affiliated Wealth Advisors, LP, and IAMC, LLC after reviewing various documents provided to him by Decedent, including confidential term sheets, private placement memoranda, Preferred offering term sheets, and other related Investment documents. (collectively the “Securities Disclosure Documents”).
2. Claimant signed Investment Agreements with Advisors Equity, LLC, Affiliated Wealth Advisors, LP, and IAMC, LLC (“Contracts”) between 2014 and July, 2020 .
3. The Decedent, Lynn E. Baker, was at all relevant times the sole person in total control of Advisors Equity, LLC, Affiliated Wealth Advisors, LP, and IAMC, LLC.
4. Since investing funds in Advisors Equity, LLC, Affiliated Wealth Advisors, LP, and IAMC, LLC, Claimant has not received adequate documentation reflecting that his investment were handled consistently with the Securities Disclosure Documents and Contracts, nor has he received the required 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, Affiliated Wealth Advisors, LP, or IAMC, LLC were invested properly and consistently with the 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, Affiliated Wealth Advisors, LP, or IAMC, 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, Affiliated Wealth Advisors, LP, or IAMC, LLC that he was not permitted to and thus 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, Affiliated Wealth Advisors, LP, or IAMC, LLC, Claimant has claims against the Estate including but not limited to negligence, 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, Affiliated Wealth Advisors, LP, or IAMC, LLC to provide required tax disclosure documentation, Claimant may have a claim against the Estate for expenses, penalties and interest related to having to amend prior years tax returns, under negligence and other theories.

f. Given how the Decedent may have mismanaged Advisors Equity, LLC, Affiliated Wealth Advisors, LP, and IAMC, LLC, Claimant has a claim against the Estate for disgorgement of fees paid to Decedent in his role as “Managing Member” of LLC’s associated with Claimant’s investments.

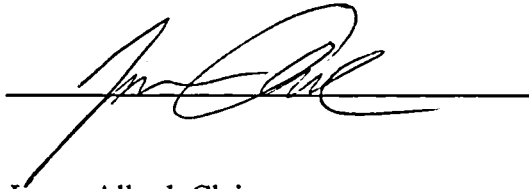
7. It is Claimant’s belief, based on documents provided by Decedent that IAMC, LLC funds (to include Claimant’s listed below) were pooled and utilized to acquire Class A interest in Advisors Equity LLC at \$10,000 per Class A interest.

8. Claimant seeks damages in the amounts invested, either via liquidated funds or unliquidated assets acquired with below detailed funds. (Totaling \$74,260.00)

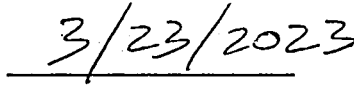
- 3/11/2014 \$22,000 = IAMC, LLC
- 6/15/015 \$11,200 = IAMC, LLC
- 5/4/2018 \$5,215.00 = IAMC, LLC
- 8/27/2018 \$10,445.00 = IAMC, LLC
- 11/19/2019 \$5,400.00 = IAMC, LLC
- 9/16/2020 \$20,000 to IAMC, LLC

I, James Allard, under penalties of perjury, do hereby declare that I have drafted the foregoing, and the facts stated herein are true to the best of my knowledge.

Please direct any communications to the contact information listed below.



James Allard, Claimant



Date

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