

# Exhibit B

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

ARTHUR NADEL;  
SCOOP CAPITAL, LLC; AND  
SCOOP MANAGEMENT, INC.,

Defendants,

Case No.: 8:09-cv-0087-T-26TBM

SCOOP REAL ESTATE, L.P.;  
VALHALLA INVESTMENT PARTNERS, L.P.;  
VALHALLA MANAGEMENT, INC.;  
VICTORY IRA FUND, LTD.;  
VICTORY FUND, LTD.;  
VIKING IRA FUND, LLC;  
VIKING FUND, LLC; AND  
VIKING MANAGEMENT, LLC.,

Relief Defendants.

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**CLAIMS PROCESS INSTRUCTIONS**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST QUEST ENERGY  
MANAGEMENT GROUP, INC.:

On January 21, 2009, the Securities and Exchange Commission instituted this enforcement action following the collapse of a massive Ponzi scheme perpetrated by Arthur Nadel through hedge funds from 1999 until January 2009. That same day, the Court entered an order appointing Burton W. Wiand as Receiver for Defendants Scoop Capital and Scoop Management, Inc. and Relief Defendants Scoop Real Estate, L.P.; Valhalla Investment Partners, L.P.; Valhalla Management, Inc.; Victory Fund, Ltd.; Victory IRA Fund, Ltd.; Viking IRA Fund, LLC; Viking Fund, LLC; and Viking Management, LLC. By a subsequent Order, on May 24, 2013, the Court expanded the Receivership to include Quest Energy Management Group, Inc. (“Quest”).

On \_\_\_\_\_, the Court entered an Order establishing \_\_\_\_\_ (the “**Claim Bar Date**”) as the last date for each person or entity (including individuals, partnerships, corporations, joint ventures, estates, trusts, and governmental units) to submit a Proof of Claim against Quest.

Any person or entity that submits a Proof of Claim submits to the exclusive jurisdiction of the United States District Court for the Middle District of Florida for all purposes, including, without limitation, as to any claims, objections, defenses, or counterclaims that could be or have been asserted by the Receiver against such claimant or the holder of such claim in connection with this Receivership, including those arising out of (1) any dealing or business transacted by or with Quest or (2) any dealing or business transacted that relates in any way to any Receivership property. Further, claimants waive any right to a jury trial with respect to such claims, objections, defenses, and counterclaims.

The Claim Bar Date and the procedures set forth below for filing a Proof of Claim apply to all claims against Quest.

## **1. WHO MUST FILE A PROOF OF CLAIM**

If you think that you are owed money by Quest or that you may otherwise have a claim against it, you **MUST** file a Proof of Claim to share in any distributions from the assets of Quest. A claim based on acts or omissions of Quest must be filed on or before the Claim Bar Date, even if such claim is not now mature, fixed, liquidated, or certain, or does not become mature, fixed, liquidated, or certain before the Claim Bar Date.

This claims process is limited to claims against Quest. The Claim Bar Date for claims against the other Receivership Entities identified above was September 2, 2010. As such, no claims against any Receivership Entities other than Quest may be submitted to the Receiver at this time.

## **2. WHAT TO FILE**

You must provide to the Receiver by the Claim Bar Date a completed and signed Proof of Claim Form which includes (1) the amount you contend is the correct amount you invested in or with and received from Quest and (2) legible copies of all documents on which you base your claim or, if any such documents are not available, a detailed explanation as to why any such documents are not available and all efforts made to obtain any such missing documents.

If you were not an investor, but believe you are or may be a creditor of Quest, you must provide to the Receiver by the Claim Bar Date (1) the amount you contend you are owed from Quest; (2) any amounts received from Quest; and (3) legible copies of all documents on which you base your claim (i.e., all invoices for goods or services provided, loan documents, etc., as applicable) or, if any such documents are not available, a detailed explanation as to why any such documents are not available and all efforts made to obtain any such missing documents.

If you invested in your individual name and also in the name of your individual retirement account ("IRA") or jointly with another individual, you **must** complete, sign, and return a separate Proof of Claim Form for each such investment. Failure to timely return a completed and signed Proof of Claim for a claim will forever bar that claim.

The Receiver reserves the right to request additional information from any Claimant. Failure to provide the requested information within the time allowed by the Receiver may result in the denial of your claim.

Each Proof of Claim you file **must** conform substantially to the Proof of Claim Form and provide responses to all of the questions in the Proof of Claim Form that either (1) was mailed to you along with these Instructions or (2), if you have not received one by mail, was posted on the Receiver's website at [www.nadelreceivership.com](http://www.nadelreceivership.com). A copy of a Proof of Claim Form also may be obtained from Mary E. Gura, Wiand Guerra King P.A., 5505 West Gray Street, Tampa, FL 33609, (813) 347-5100.

Each Proof of Claim you file **must** be signed under penalty of perjury by the Claimant or, if the Claimant is not an individual, by an authorized agent of the Claimant. If the claim is being submitted by more than one person, all persons submitting the claim must sign the Proof of Claim under penalty of perjury. Each Proof of Claim **must** be legible, written in English, and denominated in United States currency.

It is your sole responsibility to advise the Receiver of any change to your mailing address after you submit a Proof of Claim to ensure that you receive any and all future communications regarding your claim, including any possible distribution payment you may be entitled to receive.

### **3. WHEN AND WHERE TO FILE**

Except as provided for herein, original Proofs of Claim must be delivered by mail or otherwise so as to be **received on or before** \_\_\_\_\_ at the following address:

Burton W. Wiand, Esq., Receiver  
c/o Maya M. Lockwood, Esq.  
WIAND GUERRA KING P.A.  
5505 West Gray Street  
Tampa, FL 33609

**DO NOT SEND YOUR PROOF OF CLAIM FORM TO THE COURT OR JUDGE PRESIDING OVER THIS CASE.**

Facsimile and email copies of Proofs of Claim will be accepted only if received by the Receiver on or before the Claim Bar Date and the original executed Proof of Claim Form is received by the Receiver no later than three (3) days after transmission of the facsimile and/or email. Failure to provide an original executed Proof of Claim Form within the time specified may result in denial of the claim. Facsimile copies must be sent to (813) 347-5198 to the attention of Burton W. Wiand, Receiver c/o Maya M. Lockwood, and email copies must be sent to [mgura@wiandlaw.com](mailto:mgura@wiandlaw.com). Proof of Claim Forms will be considered submitted only if actually received by the Receiver, so it is your responsibility to ensure the Receiver's receipt.

### **4. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE BAR DATE**

**ANY HOLDER OF A CLAIM OR POTENTIAL CLAIM THAT FAILS TO FILE A PROOF OF CLAIM (1) THAT FULLY COMPLIES WITH ALL REQUIREMENTS SET**

FORTH HEREIN AND (2) BY THE CLAIM BAR DATE WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST QUEST, ITS SUCCESSORS, ITS PROPERTY, THE RECEIVER, THE RECEIVERSHIP, OR ANY ASSET HELD OR CONTROLLED BY THE RECEIVER AND FROM PARTICIPATING IN ANY DISTRIBUTION FROM THIS RECEIVERSHIP.

**A holder of a claim or potential claim against Quest may wish to consult an attorney regarding matters in connection with this Notice. The law firm of Wiand Guerra King P.A. acts as attorneys for the Receiver and its lawyers cannot give you personal legal or other advice.**

Dated \_\_\_\_\_, Tampa, Florida.