UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

WIGBERTO LUGO-MENDER as the duly appointed Trustee in the liquidation of EURO PACIFIC INTERNATIONAL BANK, INC.

Plaintiff,

VS.

QENTA, INC.; PETER D. SCHIFF; BRENT DE JONG; ABC INSURANCE COMPANY; XYZ INSURANCE COMPANY; and DEFENDANTS A and B.

Defendants,

EURO PACIFIC FUNDS SCC LTD.; EURO PACIFIC SECURITIES, INC.; EURO PACIFIC CARD SERVICES LTD. AND GLOBAL CORPORATE STAFFING LTD.

Parties in Interest.

CASE NO.: 25-cv-1501 (PAD)

VIOLATION OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 1, et. seq.; VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, 18 U.S.C. §1962; DECLARATORY JUDGMENT; REQUEST FOR PROVISIONAL REMEDIES PURSUANT TO THE PUERTO RICO RULES OF CIVIL PROCEDURE; DEMAND FOR TRIAL BY JURY

MOTION SUBMITTING SUMMONS FOR ISSUANCE

TO THE HONORABLE COURT:

COMES NOW Plaintiff **Wigberto Lugo-Mender** and respectfully submits the attached summons for issuance in the instant matter.

WHEREFORE, we respectfully request that the Clerk's Office proceeds to issue the attached summons.

WE HEREBY CERTIFY: On this date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system that will send notification of such filing to all attorneys of record registered in the use of the CM/ECF system.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 17th day of September 2025.

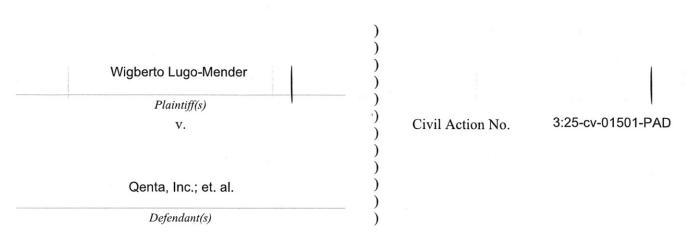
EDGE Legal, LLC 252 Ponce de León Ave. Citibank Tower, 12th Floor San Juan, Puerto Rico 00918 Tel. (787) 522-2000 Fax (787) 522-2010

s/Eyck O. Lugo EYCK O. LUGO, ESQ. USDC 216708

E-mail: <u>elugo@edgelegal.com</u>

United States District Court

for the
District of Puerto Rico



SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Brent de Jong 777 Post Oak Blvd #430 Houston, Texas 77056

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq.
USDC (Bar Number) 216708
Attorney for the Plaintiff
252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919
Telephone: (787) 522-2000
Email: elugo@edgelegal.com

Ada I. García Rivera, Esq., CPA

	CLERK OF COURT	
Date:		
	Signature of Clerk or Deputy Clerk	

Civil Action No.

3:25-cv-01501-PAD

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

	This summons for (nar	me of individual and title, if any)		
was re	ceived by me on (date)		E SEC S	
1	☐ I personally served	the summons on the individual at (place)		25 25 26
	i personany served	T S	n (date)	; or
	<u> </u>			, or -
	☐ I left the summons	at the individual's residence or usual pla		
		-	able age and discretion who re-	sides there,
	on (date)	, and mailed a copy to the indiv	vidual's last known address; or	
	☐ I served the summo	ons on (name of individual)		, who is
	designated by law to	accept service of process on behalf of (na	ame of organization)	
		0	n (date)	; or
	☐ I returned the sum	mons unexecuted because	· · · · · · · · · · · · · · · · · · ·	; or
	☐ Other (specify):			
	My fees are \$	for travel and \$	for services, for a total of \$	0.00
	I declare under penalt	y of perjury that this information is true.		
Date:	(, <u> </u>	Server's signature	
			Printed name and title	
			Server's address	

for the
District of Puerto Rico

)		
The second secon	Wigberto Lugo-Mender)		
1	Plaintiff(s) V.)	Civil Action No.	3:25-cv-01501-PAD
)		
	Qenta, Inc.; et. al.			
	Defendant(s)			

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Qenta, Inc. 777 Post Oak Blvd #430 Houston, Texas 77056

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq.
USDC (Bar Number) 216708
Attorney for the Plaintiff
252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919
Telephone: (787) 522-2000

Ada I. García Rivera, Esq., CPA

Email: elugo@edgelegal.com

	CLERK OF COURT	
Date:		
	Signature of Clerk or Der	nuty Clark

Civil Action No.

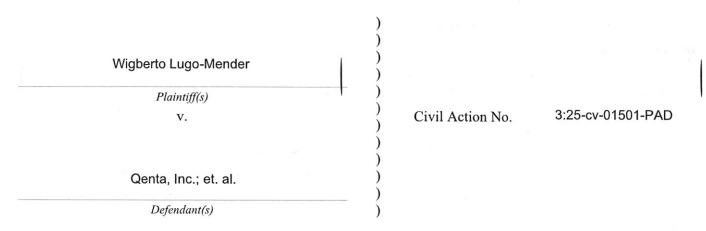
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	r sae		on (date)	; or	
	☐ I left the summons	s at the individual's residence or us	ual place of abode with (n	name)	
		, a person	of suitable age and discre	tion who resides th	ere,
	on (date)	, and mailed a copy to the	ne individual's last known	address; or	
	☐ I served the summ	ons on (name of individual)			, who is
	designated by law to	accept service of process on behal	f of (name of organization)		
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for the
District of Puerto Rico



SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Peter D. Schiff 22 Dorado Beach Estates Dorado, Puerto Rico 00646

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq. USDC (Bar Number) 216708 Attorney for the Plaintiff

252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919

Ada I. García Rivera, Esq., CPA

Telephone: (787) 522-2000 Email: elugo@edgelegal.com

	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

Civil Action No.

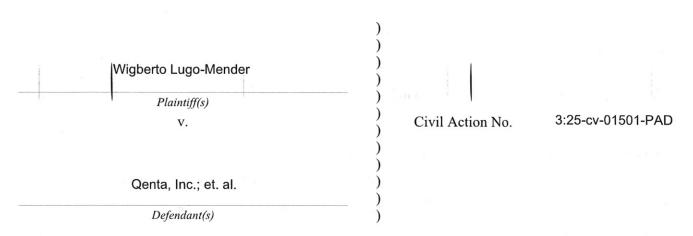
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PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

received by me on (date)	•	s .		
	O Automotive	The second of		
☐ I personally serve	ed the summons on the individual a	nt (place)	*,	
10 × ×	in the second second	on (date)	; or	
☐ I left the summon	ns at the individual's residence or u	sual place of abode with (nan	ne)	
	, a person	n of suitable age and discreti	on who resides	there,
on (date)	, and mailed a copy to t	the individual's last known a	ddress; or	
☐ I served the sumr	mons on (name of individual)	3		, who is
designated by law to	o accept service of process on beha	alf of (name of organization)		A
		on (date)	; or	
☐ I returned the sun	nmons unexecuted because			; or
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☐ Other (specify): My fees are \$	for travel and \$	for services, for a	total of \$	0.00
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for the
District of Puerto Rico



SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Euro Pacific Card Services Ltd c/o Peter D. Schiff 22 Dorado Beach Estates Dorado, Puerto Rico 00646

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq. USDC (Bar Number) 216708 Attorney for the Plaintiff

252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919

Ada I. García Rivera, Esq., CPA

Telephone: (787) 522-2000 Email: elugo@edgelegal.com

	CLERK OF COURT
Date:	
	Signature of Clerk or Deputy Clerk

Civil Action No.

3:25-cv-01501-PAD

PROOF OF SERVICE

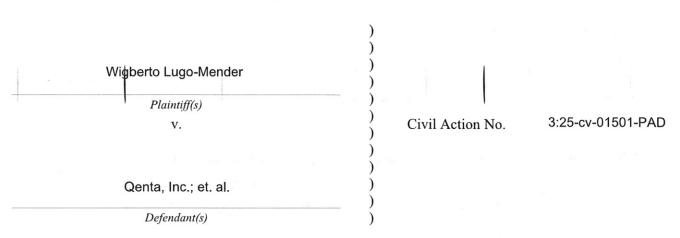
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	This summons for (nan	me of individual and title, if any)			
was re	ceived by me on (date)				
			man and a second of		
	☐ I personally served	the summons on the individu	ial at (place)	16 25 4	3
		28.09	on (date)	; or	
	☐ I left the summons		or usual place of abode with (
		, a pe	erson of suitable age and discre	etion who resides the	ere,
	on (date)	, and mailed a copy	to the individual's last known	address; or	
		ons on (name of individual)			, who is
	designated by law to	accept service of process on b	pehalf of (name of organization)		
	-		on (date)	; or	
	☐ I returned the summ	nons unexecuted because			; or
	☐ Other (specify):				
	My fees are \$	for travel and \$	for services, for	a total of \$	0.00
	I declare under penalty	y of perjury that this informat	ion is true.		
Date:					
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			Server's add	ress	3

United States District Court

Page 1 of 2

for the
District of Puerto Rico



SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Euro Pacific Funds SCC Ltd c/o Peter D. Schiff 22 Dorado Beach Estates Dorado, Puerto Rico 00646

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq. USDC (Bar Number) 216708 Attorney for the Plaintiff

252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919

Ada I. García Rivera, Esq., CPA

Telephone: (787) 522-2000 Email: elugo@edgelegal.com

	CLERK OF COURT	
Date:		
	Signature of Cl	ark or Danuty Clark

Civil Action No.

3:25-cv-01501-PAD

PROOF OF SERVICE

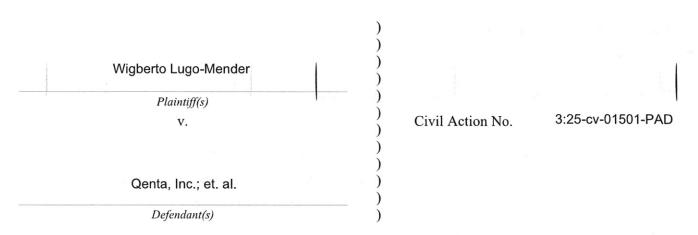
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	This summons for (no	ame of individual and title, if any)		
was re	ceived by me on (date)			
	☐ I personally serve	d the summons on the individua	al at (place)	
		$Y = \{e_1, e_2, e_3, \dots, e_n\}$	on (date)	; or
	☐ I left the summons	s at the individual's residence of	or usual place of abode with (name)	
		, a per	rson of suitable age and discretion who re	sides there,
	on (date)	, and mailed a copy	to the individual's last known address; or	
	☐ I served the summ	ons on (name of individual)		, who is
	designated by law to	accept service of process on be	ehalf of (name of organization)	
		Γ_{i}	on (date)	; or
	☐ I returned the sum	mons unexecuted because	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	; or
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	I declare under penal	ty of perjury that this informati	on is true.	
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United States District Court

for the

District of Puerto Rico



SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Euro Pacific Securities, Inc. c/o Peter D. Schiff 22 Dorado Beach Estates Dorado, Puerto Rico 00646

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq. USDC (Bar Number) 216708 Attorney for the Plaintiff 252 Ponce de Leon Ave. Citi Tower, Suite

252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919 Telephone: (787) 522-2000

Ada I. García Rivera, Esq., CPA

Telephone: (787) 522-2000 Email: elugo@edgelegal.com

	CLERK OF COURT	,
Date:		
	Signature o	f Clerk or Deputy Clerk

Civil Action No.

3:25-cv-01501-PAD

Additional information regarding attempted service, etc:

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

	This summons for (name	ne of individual and title, if any)						
was re	ceived by me on (date)		T					
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	, a person of suitable age and discretion who resides there,							
	on (date), and mailed a copy to the individual's last known address; or							
	☐ I served the summo	ns on (name of individual)		, who is				
	designated by law to accept service of process on behalf of (name of organization)							
	3		on (date)	; or				
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	I declare under penalty	of perjury that this information	on is true.					
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for the
District of Puerto Rico

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Wigberto Lugo-Mender	100	ı.	
Plaintiff(s)			
v.)	Civil Action No.	3:25-cv-01501-PAD
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Qenta, Inc.; et. al.	ý		
Defendant(s)		15	

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Global Corporate Staffing Ltd c/o Peter D. Schiff 22 Dorado Beach Estates Dorado, Puerto Rico 00646

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eyck O. Lugo Rivera, Esq.
USDC (Bar Number) 216708
Attorney for the Plaintiff
252 Ponce de Leon Ave, Citi Tower, Suite 1200, San Juan, PR 00919

Telephone: (787) 522-2000 Email: elugo@edgelegal.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

	CLERK OF COUL	RT		
Date:				
	Signatur	Signature of Clerk or Deputy Clerk		

Ada I. García Rivera, Esq., CPA

Civil Action No.

3:25-cv-01501-PAD

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (1))

ceived by me on (date)	•	1					
nersonally served th	ne summons on the individual at	(place)					
		on (date)	; or				
☐ I left the summons at	the individual's residence or us	ual place of abode with (name)					
, a person of suitable age and discretion who resides there,							
on (date)	, and mailed a copy to the individual's last known address; or						
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designated by law to ac	designated by law to accept service of process on behalf of (name of organization)						
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