

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: elugo@edgelegal.com

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No. 3:25-cv-01501-PAD

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

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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual 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

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No.

3:25-cv-01501-PAD

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
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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 on *(date)* _____; or

☐ I left the summons at the individual's residence or usual 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

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No. 3:25-cv-01501-PAD

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
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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 on *(date)* _____; or

☐ I left the summons at the individual's residence or usual 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

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No. 3:25-cv-01501-PAD

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
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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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 (l))*

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 on *(date)* _____; or

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☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No. 3:25-cv-01501-PAD

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
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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 3:25-cv-01501-PAD

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No. 3:25-cv-01501-PAD

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 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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

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Date: _____

Server's signature

Printed name and title

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Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Puerto Rico

Wigberto Lugo-Mender

Plaintiff(s)

v.

Qenta, Inc.; et. al.

Defendant(s)

Civil Action No. 3:25-cv-01501-PAD

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.

Ada I. García Rivera, Esq., CPA
CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

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 on *(date)* _____; or

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☐ Other *(specify)*: _____

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: