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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 15 Case
FAIRFIELD SENTRY LIMITED, <i>et al.</i> ,	Case No. 10-13164 (SMB)
Debtors in Foreign Proceedings.	Jointly Administered
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, as assignee of Fairfield Sentry Limited,	Adv. Pro. No. 10-03800 (SMB)
Plaintiff,	
v.	
FAIRFIELD GREENWICH GROUP, FAIRFIELD GREENWICH (BERMUDA) LIMITED, FAIRFIELD GREENWICH ADVISORS, LLC, FAIRFIELD GREENWICH LIMITED, FAIRFIELD INTERNATIONAL MANAGERS, INC., WALTER M. NOEL, JR., JEFFREY TUCKER, ANDRÉS PIEDRAHITA, AMIT VIJAYVERGIYA, PHILIP TOUB, and CORINA NOEL PIEDRAHITA,	
Defendants.	
FAIRFIELD GREENWICH (BERMUDA) LIMITED,	
Third-Party Plaintiff,	
v.	
FAIRFIELD SENTRY LIMITED (IN LIQUIDATION),	
Third-Party Defendant.	

**DECLARATION OF JONATHAN A. FORMAN IN SUPPORT
OF THE TRUSTEE'S OPPOSITION TO DEFENDANTS' MOTION TO
DISMISS THE TRUSTEE'S [PROPOSED] SECOND AMENDED COMPLAINT**

I, Jonathan A. Forman, hereby declare as follows:

1. I am an attorney with Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, and as assignee of claims from Fairfield Sentry Limited.

2. I submit this Declaration in support of the Trustee's opposition to the Defendants' motion to dismiss the [proposed] second amended complaint filed in the above-captioned adversary proceeding.

3. Attached hereto as Exhibit 1 is a true and correct copy of a Lexisnexis Accurint report dated October 3, 2014 showing Andrés Piedrahita's property ownership.

4. Attached hereto as Exhibit 2 is a true and correct copy of the floorplan for Fairfield Greenwich Group's New York office.

5. Attached hereto as Exhibit 3 is a true and correct copy of email correspondence dated June 30, 2008 between Andrés Piedrahita and Fairfield Greenwich Group colleagues.

6. Attached hereto as Exhibit 4 is a true and correct copy of email correspondence dated October 23, 2007 between Andrés Piedrahita and Fairfield Greenwich Group colleagues.

7. Attached hereto as Exhibit 5 is a true and correct copy of email correspondence dated October 15, 2008 between Fairfield Greenwich Group and Annex Limited.

8. Attached hereto as Exhibit 6 is a true and correct copy of Fairfield Greenwich Limited's response to an information request from the SEC dated January 22, 2009.

9. Attached hereto as Exhibit 7 is a true and correct copy of the First Amended and Restated Shareholder and Voting Agreement for Fairfield Greenwich Limited dated April 1, 2007.

10. Attached hereto as Exhibit 8 is a true and correct copy of a Questionnaire for Due Diligence Review of Hedge Fund Managers from Samba Financial Group prepared by Fairfield Greenwich Group.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 23, 2019
New York, New York

By: /s/ Jonathan A. Forman

Jonathan A. Forman