

After Foreclosure Assets

Powered By  MILAN CM

INVESTOR MATERIALS · 2026

Investment Summary

How Milan CM acquires, confirms and recovers surplus equity claims, and how investors participate.

PREPARED BY

Milan Collateralized Markets
Newport Beach, California

CONFIDENTIALITY NOTICE

This summary is a representative overview of the process and documentation supporting confirmed surplus equity claims managed by the Milan CM After Foreclosure Assets Division. Personally identifiable information (for example names, addresses and county file numbers) has been redacted to protect all parties.

At a Glance

KEY POINTS

- Surplus equity is real money held by courts, trustees and counties, documented in public records.
- Milan CM buys the former owner's rights outright, then recovers the claim through its attorneys.
- Investors buy in only after a court or trustee has confirmed the claim. The legal work is done first.
- Current packages typically state a 14% return, and it varies by package.

THE ASSET	Surplus equity: the money left over when a foreclosed property sells for more than the debt against it, held by a court, trustee or county.
WHAT MILAN CM DOES	Buys the former owner's rights to the surplus outright, becomes the owner of the claim and recovers it through its attorneys.
WHAT YOU BUY	A beneficial interest in a package of claims already confirmed by a court or trustee, under a Purchase and Sales Agreement.
CUSTODY OF FUNDS	Released funds go directly to the attorney's IOLTA trust account, then through Milan CM LLC to the investor's account on the platform.
STANDARD RETURN	Current packages typically state a 14% return, and it varies by package. Each package's terms are set in its Purchase and Sales Agreement.
PURCHASE TERMS	Minimum purchase \$10,000, maximum \$2,000,000, plus a transaction fee of \$300 to \$1,000. No management fees.
TRACK RECORD	\$126M+ recovered across 1,000+ claims in five states over four years.

CONTENTS

01	The asset	07	The record
02	How surplus equity is claimed	08	The firm and its leadership
03	How Milan CM acquires a claim	09	Why Milan CM works with private capital
04	Filing and confirmation	10	The market ahead
05	How the money moves	11	How to verify us
06	What the investor buys	12	Risks

01

THE ASSET

IN BRIEF

81% of homeowners in active foreclosure held at least 10% equity (CFPB, 2023).

The Asset

Every year, billions of dollars in surplus equity are left behind after foreclosure, tax and sheriff sales. By law these funds belong to the former owners or lien holders, and many are never claimed.

Foreclosure no longer implies negative equity. When a property sells for more than the debt against it, the difference is held by a clerk of court, trustee or county until a valid claim is filed.

Exhibit 1: Counties publish their surplus balances

Investors can review these public sources directly.

COUNTY	PUBLIC SOURCE
Marion County, FL	marioncountyclerk.org , Unclaimed Funds: how to claim surplus
Sarasota County, FL	sarasota.realtldm.com , public case list (search “Balance Type”)
Maricopa County, AZ	treasurer.maricopa.gov , Reports: excess proceeds

Source: county clerk and treasurer websites.

02

CLAIMS

WHY IT SITS UNCLAIMED

More than 3,000 county jurisdictions, no central database and no standard process.

How Surplus Equity Is Claimed

Claiming surplus equity is not automatic. It requires:

- Legal documentation proving the claimant’s identity and entitlement
- Formal filings with the court or trustee, usually through an attorney
- Follow-up with the disbursing authority until the funds are released

Claim forms are public. Examples are published by Marion County (marioncountyclerk.org), Sarasota County (sarasotaclerk.com) and the Maricopa County Superior Court (superiorcourt.maricopa.gov).

That friction is why the money sits unclaimed, and why a disciplined operator can recover it.

03

ACQUISITION

OUR AFFILIATE

Claims are acquired and recovered through Rockwell CP LLC, Milan CM's acquisition affiliate. Agreements, filings and checks in this summary carry its name.

How Milan CM Acquires a Claim

FINDING THE OWNER

We identify former owners through public records, skip tracing and probate research. They are often elderly or deceased owners whose heirs are unaware, owners who lost a property to hardship, or families who moved and never learned a surplus exists.

A former owner in Houston had \$128,000 due to her and did not know it existed. We reached out, made an offer, and she received her buyout payment within three days.

THE BUYOUT

We offer the owner a lump sum up front in exchange for all of their rights to the claim. The owner is paid immediately instead of waiting months for a court process. Milan CM becomes the owner of the claim and carries the recovery from there.

Exhibit 2: Buyout agreement (excerpt)

Redacted. The agreement transfers all of the owner's rights, legal claims and interests in the held funds.


OCKWELL

THIRD PARTY HELD FUNDS BUYOUT AGREEMENT

This Buyout Agreement ("**Agreement**") is entered into and effective on the date last signed below by and between:

1. **Rockwell CP LLC**, a limited liability company (hereinafter referred to as "**Buyout Firm or Rockwell**");
2. _____, an individual (hereinafter referred to as "**Original Claimant or OC**");

(hereinafter referred to individually as a "**Party**" and collectively as the "**Parties**").

The reasons for this Agreement are as follows:

- Rockwell has identified funds currently held by a third party, which it holds a reasonable belief that OC may possess a partial or complete entitlement to;
- OC has abstained from making any endeavor to assert ownership over these funds;
- Both Parties recognize and consent that OC's potential entitlement to these funds constitutes a prospective right that may generate substantial, minimal, or no future pecuniary worth;
- OC acknowledges and comprehends that Rockwell has entered into this Agreement with the expectation of accruing financial gain;
- OC acknowledges that OC lacks sufficient information regarding the third party held funds to make any determination concerning the veracity of his/her right to assert any claim over said funds.

In consideration of the matters described above and of the mutual benefits and obligations set forth in this Agreement, the receipt and sufficiency of which consideration is hereby acknowledged, the Parties agree as follows:

1. DEFINITIONS

"Third Party Held Funds" means government held funds, unclaimed funds, state held funds, and court held funds.
 "Effective Date" means the date when this Agreement is last signed below by one of the parties.
 "Proprietary Process" means the process owned and developed by Rockwell to retrieve the third party held funds.

2. TRANSFER OF RIGHTS

OC transfers all its ownership, legal claims, and interests to Rockwell for the third party held funds, estimated at \$ _____, subject to verification by Rockwell's attorneys upon receipt of this Agreement. Any funds obtained exceeding this estimated amount shall be divided as set forth in Article 3 between Rockwell and OC.

3. PAYMENT

In consideration for these rights, Rockwell shall remunerate OC \$[total amount Rockwell will pay claimant] as detailed below.

04

CONFIRMATION

THE INVESTOR’S ENTRY POINT

Only claims a court or trustee has confirmed in writing are offered to investors.

Filing and Confirmation

THE ATTORNEY FILES

Every claim is filed by an attorney. Our counsel drafts and submits the claim, files the supporting documents (affidavits, assignments and court forms) and works directly with the trustee, clerk or fund administrator.

THE TRUSTEE CONFIRMS

Once the filing is processed, the trustee or court confirms in writing that the claim is valid and the surplus is pending disbursement.

Exhibit 3: A trustee’s accounting as of the sale date

From a trustee’s written confirmation on a Texas claim. Names redacted.

LINE ITEM	AMOUNT
Net sale price	\$191,000.00
Loan payoff	(\$87,662.79)
Trustee fee	(\$4,775.00)
Balance as of sale date (surplus)	\$98,562.21

Source: trustee confirmation email. Before release, the trustee also reviews title for junior liens and outstanding HOA assessments, which can reduce the final amount.

FUNDS GO TO THE ATTORNEY’S TRUST ACCOUNT

When the trustee releases payment, the check or wire goes directly to the attorney’s IOLTA trust account. That keeps the funds in legal custody and creates a documented chain from the court to the investor.

05

FLOW OF FUNDS

WHERE THE INVESTOR ENTERS

At step 6, after a court or trustee has confirmed the claim.

How the Money Moves

The path of one surplus equity claim, from the auction to the investor. Every dollar is held by a named custodian at every stage, and every movement is documented by a court, trustee or county record.

Exhibit 4: Flow of funds in an after foreclosure asset

Illustrative example: a \$300,000 foreclosure sale against \$200,000 of debt

HELD BY THE SALE	1	The auction The property sells at a judicial or trustee foreclosure sale.	\$300,000 SALE PRICE
PAID TO THE LENDER	2	The debt is satisfied Senior debt and valid liens are paid in full from the sale proceeds.	\$200,000 TO THE LENDER
HELD IN CUSTODY	3	The surplus is held The remainder is deposited with the clerk of court, trustee or county. By state law it belongs to the former owner.	\$100,000 HELD IN CUSTODY
	4	The claim right is acquired Milan CM acquires the former owner's right to the surplus.	
	5	The claim is confirmed Milan CM's attorneys file the claim. The court or trustee confirms the surplus amount. Our attorneys work to have the claim released to us.	
INVESTOR'S POSITION	6	The investor purchases The investor buys a beneficial interest in a package of confirmed claims, under a Purchase and Sales Agreement.	Purchase CAPITAL IN
	7	The disbursement The custodian releases the funds to Milan CM's attorneys. The proceeds are then deposited into the investor's account on the platform, per the agreement.	Payout PROCEEDS OUT

WHY THE ASSET EXISTS

Foreclosure no longer implies negative equity. A January 2023 CFPB analysis found 81% of homeowners in active foreclosure held at least 10% equity. When the sale exceeds the debt, the difference is surplus equity, and much of it is never claimed.

WHY THE INVESTOR ENTERS LATE

The investor buys after the claim is confirmed (steps 5 to 6). The legal work and most of the waiting happen before the purchase. Timing to disbursement depends on the court or trustee's administrative processing.

WHAT THE AGREEMENT SETS

Each package has its own stated asset value and purchase price, written into its Purchase and Sales Agreement. Current packages typically state a 14% return, and it varies by package.

Figures are illustrative and do not describe a specific transaction. Source: Consumer Financial Protection Bureau (January 2023, citing Black Knight data).

Current packages typically state a 14% return, and it varies by package.

What the Investor Buys

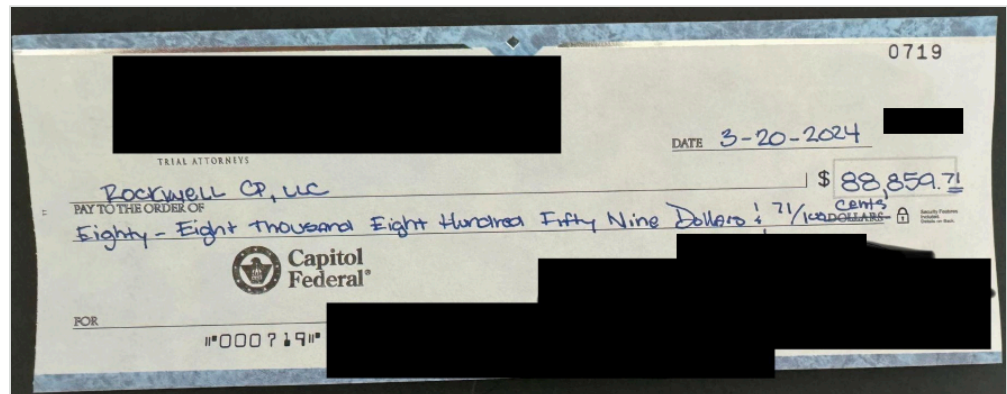
- A **beneficial interest** in a package of claims, purchased under a **Purchase and Sales Agreement** that states the asset value and purchase price.
- Every claim in the package is already **confirmed** by a court or trustee and pending disbursement. The investor enters after the legal work is done.
- The investor receives a share of the disbursed proceeds, as set out in the agreement. The agreement is held on file with the attorney's office.

HOW INVESTORS ARE PAID

- Proceeds pass from the attorney's IOLTA trust account to Milan CM LLC, which deposits them into the investor's account on the platform.
- Payouts typically arrive 8 to 12 weeks after purchase.
- Each payout comes with a closing report confirming the amount received and the case reference (masked).

Exhibit 5: A disbursement check from the trustee's attorneys

\$88,859.71, dated March 20, 2024. Account details and names redacted.



07

PERFORMANCE

ON RETURNS

Packages purchased in the first months, before this record existed, stated higher returns. Current packages typically state 14%.

08

THE FIRM

LEADERSHIP

Private markets are led by a former government investigator.

The Record

\$126M+ RECOVERED	1,000+ CLAIMS RECOVERED	100% PAID AFTER CONFIRMATION	17–126 DAYS TO PAYOUT
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- Every claim confirmed by a trustee or court has paid out to date.
- The fastest payout took 17 days and the longest 126 days.
- Recoveries span five states over four years of operation.

The Firm and Its Leadership

Milan CM’s After Foreclosure Assets Division turns overlooked, undervalued after foreclosure assets into recoverable, documented ones. We have built internal tools to track and verify every claim through its lifecycle. Our team includes attorneys, acquisition specialists, quantitative analysts, researchers, data specialists, former title specialists and operators. The firm operates from Newport Beach, California.

BRYCE GARDNER, EXECUTIVE DIRECTOR OF PRIVATE MARKETS

A former government investigator, Mr. Gardner leads the division’s private markets work: investor diligence, package allocation and reporting. He brings an investigator’s discipline to every claim before it reaches an investor, and connects confirmed claims with investors who want verified, documented assets.

09

CAPITAL

IN BRIEF

Capital is deployed only on confirmed claims.

Why Milan CM Works with Private Capital

Sourcing and recovery are built. Working capital determines how many claims the firm can carry at once.

- Most claims Milan CM purchases exceed \$75,000, and they are not widely available.
- Investor capital is deployed only on claims that are filed, confirmed by a court or trustee and pending disbursement.
- More capital means more confirmed claims recovered sooner, for the former owners and for investors.

10

OUTLOOK

LEGAL FOOTING

Tyler v. Hennepin County (2023) confirmed that surplus beyond what is owed is the former owner's property.

The Market Ahead

After foreclosure assets are in the early stages of becoming an institutional asset class.

- Foreclosure activity is rising: November 2025 saw 35,651 filings, up 21% year over year.
- Estimates from high-transparency jurisdictions suggest \$5 to \$8 billion in unclaimed surplus nationally, with new surplus generated every year. These estimates are directional.
- Since *Tyler v. Hennepin County*, states have been reforming how surplus is returned.
- States are digitizing court systems, and data tools are shortening the time it takes to locate owners.
- Institutions are beginning to look at the asset class, which today remains uncrowded.

Sources: ATTOM Data Solutions, U.S. Foreclosure Market Report (November 2025); *Tyler v. Hennepin County*, 598 U.S. 631 (2023); Milan CM, After Foreclosure Assets: The Institutionalization of Surplus Equity (December 2025).

11

VERIFICATION

OUR STANDARD

Check every claim before you buy.

How to Verify Us

We would rather be verified than believed. Before you purchase:

- **Trustee confirmation.** Every claim in a package has been confirmed in writing by its trustee or court administrator as pending disbursement. We keep the confirmations, motions and filings on record.
- **The chain of title.** Each claim comes with the former owner's signed buyout of rights and timestamped filing receipts from the proper authority.
- **Public records.** County surplus lists are public (Section 01). Ask us for a county contact in any state we work in, and confirm the process yourself.
- **Completed transactions.** Redacted records of prior disbursed claims are available, showing purchase, signing, funding and payout.

12

RISKS

READ FIRST

Understand these before any purchase.

Risks

Every investment carries risk. Investors should understand these before purchasing:

- **Timing.** Disbursement depends on each court or trustee's administrative processing. Past payout times (17 to 126 days) do not guarantee future timing.
- **Final amount.** Junior liens, assessments or fees identified before release can reduce the amount disbursed. The Purchase and Sales Agreement sets out how a shortfall is handled.
- **Legal and regulatory change.** State law, court procedure and fee rules can change and may affect timing or recovery.
- **Reliance on the firm.** Recovery depends on Milan CM, its affiliate and its attorneys performing their roles.
- **Liquidity.** There is no secondary market for a beneficial interest. Investors should expect to hold until disbursement.

This summary is provided for informational purposes only and does not constitute investment advice, a recommendation or an offer to buy or sell any security. Returns are not guaranteed except as expressly provided in a Purchase and Sales Agreement. Past performance is not indicative of future results. Examples are drawn from completed transactions and are not representative of every claim. Readers should conduct their own due diligence and consult qualified professionals before making any investment decision.

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Next Steps

Request the Due Diligence Packet and a sample Purchase and Sales Agreement, review them with your advisors and ask for a county contact to verify the process yourself.

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