# THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

UNITED STATES COMMODITY	§	
FUTURES TRADING COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. A-12-CV-0862-LY
	§	
SENEN POUSA, INVESTMENT	§	
INTELLIGENCE CORPORATION,	§	
DBA PROPHETMAX MANAGED FX,	§	
JOEL FRIANT, MICHAEL DILLARD, and	§	
ELEVATION GROUP, INC.,	§	
	§	
Defendants.	§	

## RECEIVER'S STATUS UPDATE AND MOTION FOR APPROVAL OF ELEVENTH FEE APPLICATION

Guy M. Hohmann, the Court-appointed Receiver in the above-referenced ProphetMax Receivership matter and the ancillary IB Capital matter, files this Status Update and Motion for Approval of Eleventh Fee Application, and Brief in Support ("Motion") covering July 28, 2019, through February 29, 2020. The Receiver believes this Motion and brief in support demonstrate the Receiver's fees and expenses were reasonable and necessary.

#### I. FUNDS IN THE ING ACCOUNTS

As set forth in previous status reports, the Receiver filed a Motion for Turnover against ING Bank ("ING") seeking to obtain approximately USD \$7 million which were on deposit with ING in the name of IB Capital or Maverick Venture Capital Holding Ltd. (the "ING Accounts"). The Turnover Order was issued on December 10, 2019. ING filed a notice of appeal of the Turnover Order on December 6, 2019. Thereafter, the court instructed the Receiver and counsel for ING to attempt to resolve the issue through further discussions.

A meeting occurred in Amsterdam on January 6, 2020, between ING, the Receiver's Dutch counsel and representatives of the Dutch Public Prosecutor's Office ("DPPO"). An agreement in principal was reached at the January 6<sup>th</sup> meeting. That agreement provides for the DPPO to lift the attachment on the ING accounts for amounts in excess of EUR 3 million. The latter amount is being set aside for other alleged victims of Mr. Echade and Mr. Geurkink previously referred to in earlier reports as the CSF victims. Once the written agreements arising out of the January 6<sup>th</sup> meeting have been finalized and executed, ING will be wire transferring the balance of the funds (approximately USD \$3.6 million) to the Receiver. It is hoped that will occur within the next week.

#### II. STATUS OF LITIGATION AGAINST RELIEF DEFEDNANTS

The Receiver's Original Complaint against Relief Defendants (the "Relief Defendant Litigation") named eight individuals that were the recipients of funds which were misappropriated from IB Capital. Apart from Zsofia Dobos (discussed more fully below), none of the Relief Defendants have filed an Answer to the Complaint. The Receiver filed Requests for Entries of Default against five of the Relief Defendants. The Clerk of the Court entered those defaults. The Receiver also filed Motions for Entry of Default Judgments against the defaulted defendants. The total amount of the default Judgments, if entered, would be approximately USD \$18.2 million.

It is the Receiver's hope that he will receive assignments (hereinafter "Assignment Documents") from all the Relief Defendants for the funds in the accounts at issue. For those defendants from whom the Receiver does not receive assignments, he will seek to obtain judgments against them and will then file the appropriate proceedings in the jurisdictions where the assets are located and seek to have them repatriated to the United States.

### III. ASSIGNMENTS FROM NEOTEX ADVANCED, LTD. AND ESSADIA MOUTAOUAKKIL

The Receiver recently received executed Assignment Documents from Essadia Moutaouakkil ("E. Moutaouakkil") and Neotex Advanced, Ltd. ("Neotex"). The Assignment Documents reference approximately USD \$5.5 million in three separate bank accounts. Approximately eighty percent (80%) of these funds are in Morocco with the balance located in Cyprus. The Receiver has been in recent communication with the DPPO, regarding the Assignment Documents and a number of other topics. Representatives of the DPPO have indicated they will be reaching out to authorities in Morocco and Cyprus and requesting them to release these funds to the Receiver. The Receiver is very grateful for the assistance which the DPPO's office has been, and will be, providing in the future.

The funds in the Moroccan bank account are in Moroccan Dirham ("MAD"). The Receiver has been advised it is against Moroccan law to transfer MAD out of Morocco. The Receiver has recently initiated communications with a bank that has branch offices in the United States and Morocco. The Receiver will attempt to have the funds in the Moroccan account converted to United States Dollars so they may then be repatriated.

## IV. POSSIBLE ASSIGNMENTS FROM RIKNIK & SONS, LTD., MICHEL GEURKINK AND ZSOFIA DOBOS

Zsofia Dobos, a resident of Hungary, is the only defendant which filed an Answer to the Receiver's Complaint Against Relief Defendants. In her Answer, she claims that she was not aware of the Riknik & Sons, Ltd. ("Riknik") account. The Riknik account is located at CO Banka in Slovakia and contains approximately USD \$7.2 million. Ms. Dobos is listed as the ultimate beneficial owner of Riknik. Ms. Dobos's Hungarian counsel has recently indicated Ms. Dobos is willing to execute the Assignment Documents if the Receiver agrees to dismiss Ms. Dobos from

the Relief Defendant Litigation. The Receiver has offered to file a Motion to Dismiss Ms. Dobos within five (5) days of his receipt of the Riknik funds.

## V. ANTICIPATED JUDGMENTS AGAINST JENNIFER MARIE WEARE AND RANDIUS, LTD.

The Receiver had a difficult time locating and serving two of the Relief Defendants (Jennifer Marie Weare and Randius, Ltd.). The Clerk of the Court entered a default against Ms. Weare on February 24, 2020. Randius, Ltd. was served on February 29, 2020. The Answer for Randius, Ltd. was due on March 23, 2020. The Receiver filed a Motion For Entry of Default against Randius on March 24, 2020. At one time, Randius. Ltd. had an account with the Bank of Cyprus with USD \$7,219,167 on deposit. Ms. Weare is listed as the ultimate beneficial owner of Randius, Ltd.

The Randius funds were originally on deposit with Laiki Bank in Cyprus. Laiki Bank was declared insolvent in the spring of 2013. Cypriot law provides that bank deposits are protected up to EUR 100,000. The Receiver has retained Cypriot counsel to assist in recovering funds on deposit in the name of Neotex (located in Cyprus). The Receiver will be consulting with Cypriot counsel and the DPPO in seeking to petition the Cypriot government to lift the cap on depositor insurance protection given the circumstances.

#### VI. UPCOMING DISCUSSIONS WITH RABIAA MOUTAOUAKKIL

The Receiver was recently informed by the DPPO that Rabiaa Moutaouakkil ("R. Mouattaoukkil") is interested in resolving the claims against her. The Receiver's Dutch counsel followed up with Ms. R. Moutaouakkil's counsel who indicated she will soon be retaining new counsel, in order to further discuss settlement. It is the Receiver's understanding there are five tracts of real estate in Morocco titled in the name of R. Moutaouakkil which were acquired with funds that were misappropriated from IB Capital. The Receiver, with assistance from Moroccan

counsel, will seek to have title transferred to him and the real estate sold thereafter with the proceeds being returned to the Receivership estate. The Receiver is not certain of the value of the real estate in question but understands it may be in the range of USD \$1 to \$1.5 million.

#### VII. STATUS OF DUTCH PROCEEDING

The Receiver's Dutch counsel provides as follows: Even though significant IB Capital funds have been traced to various jurisdictions, it is clear that not all of the misappropriated funds will be located and repatriated. Whatever the shortfall may be, the Receiver will seek to hold ING Bank responsible for the difference, as proper Know Your Customer ("KYC") checks and account monitoring by ING Bank would have prevented the misappropriations from occurring. As previously reported, in September 2018, it was learned that ING Bank had avoided criminal liability with the Dutch authorities arising out of its failure to conduct proper KYC checks and account monitoring for a significant period of time, including the period 2011-2012 when the IB Capital fraud with ING Bank accounts took place. The non-prosecution agreement between the Dutch authorities and ING prevents the Receiver and the IB Capital victims from joining criminal prosecution of ING Bank to obtain an order to compensate them for damages in the criminal proceeding. That is one of the reasons the Receiver has filed a Complaint against the settlement before the Court of Appeal in The Hague ("the Court"). By judgment of 30 September 2019, the Court ruled the Receiver is admissible in its Complaint and ordered the public prosecutors to submit certain documents underlying the settlement. By letter of 3 December 2019, the Receiver's Dutch counsel was informed the public prosecutor had provided the Court certain documents. The Court subsequently ordered the public prosecutor to provide additional documents to the Receiver's Dutch counsel. By letter of 27 January 2020, the Receiver's Dutch counsel was informed that certain documents could be reviewed at the Court on a confidential

basis and that a hearing was planned to take place on 18 March 2020. The Receiver's Dutch counsel reviewed the documentation made available at the Court. By letter of 6 March 2020, the Receiver's Dutch counsel informed the Court that, despite having been given several opportunities to comply, the public prosecutor had failed to provide the documents necessary to justify the settlement and that for that reason alone, the Receiver's Complaint should now be granted as soon as possible. By letter of 16 March 2020, the Court announced that, due to the outbreak of the corona virus, the 18 March 2020, hearing was cancelled and postponed until further notice.

#### VIII. UPCOMING INTERIM DISTRIBUTION

It is important to note; this is a multi-step process and we remain at the beginning of the repatriation stage. Now, that it appears the Receiver will be in possession of a significant amount of the funds that were misappropriated from IB Capital; he will be filing a Motion to Approve an Interim Distribution to the investor victims. Upcoming steps for the Receiver and his team include sending the investor victims the court approved "Release form" *See* Order Approving Claims Process, Notice Procedures and Bar Date, Case No. 1:15-cv-01022-LY, *U.S. Commodity Futures Trading Commission v. IB Capital FX, LLC et al.* [IB Capital Matter Dkt. 101]. Once the Receiver has been able to determine the amount of funds to be repatriated, the Receiver will submit to the court a Motion for Interim Distribution. The Receiver hopes to have the amount of the interim distribution determined, within the next 30 days.

The Receiver will also be filing a motion requesting the Court to direct the National Futures Association ("NFA") to assist the Receiver in making the interim distribution. If directed by the Court to do so, it is the Receiver's understanding the NFA has agreed to make the distributions at no cost to the Receivership estate.

#### IX. RECEIVER'S ELEVENTH FEE APPLICATION

Finally, the Receiver also requests the Court approve the Receiver's Eleventh Fee Application totaling \$191,179.75 The "Eleventh Fee Period" includes fees incurred by the Receiver for the seven-month period between July 25, 2019, and February 29, 2020.

During the Eleventh Fee Period, the Receiver had extensive communications with the CFTC and his retained counsel located in Amsterdam, the United Kingdom (the "UK"), Slovakia, Hungary and Cyprus. Communications with the Receiver's Dutch counsel involved facilitation of communications and meetings between the Receiver's Dutch counsel, representatives of the DPPO and Dutch counsel for ING Bank and staying abreast of the Complaint against ING Bank's settlement with the Dutch State.

Communications with the Receiver's UK counsel primarily involved the filings in that country seeking to have IB Capital and Maverick restored to the Registrar of Companies. This filing was made necessary due to ING's counsel's position the Assignment Documents between the Receiver and IB Capital and Maverick were invalid because the companies did not validly exist because they had been stricken from the Registrar of Companies in the UK.

Communications with Hungarian and Slovakian counsel have focused on recovery of the approximate USD \$7.2 million in Riknik's account at CO Banka in Slovakia. The ultimate beneficial owner of Riknik is Zsofia Dobos, a resident of Hungary. The Receiver spent significant time communicating with counsel in the Seychelles and in Cyprus in connection with service of process on the Relief Defendants (discussed more fully below).

The Receiver has also been communicating with counsel in Dallas, Texas on a few discreet issues and in connection with retention of counsel in the jurisdictions referenced above.

During the Eleventh Fee Period, the Receiver prepared Assignment Documents and negotiated their execution for frozen accounts in the name of Essadia Moutaouakkil, and Neotex. As noted above, the Receiver has also prepared Assignment Documents for the Riknik funds and has been communicating with Ms. Dobos's counsel and the DPPO concerning their potential execution. The Receiver prepared the Turnover Motion referenced above and responded to filings by ING contesting the Turnover Order. In preparation for an interim distribution, the Receiver's team continues to update and validate investor victim's contact information and documentation. The Receiver also filed a Complaint Against Relief Defendants in September of 2019. This suit seeks to disgorge all amounts from various individuals and entities in whose accounts the misappropriated funds from IB Capital were transferred, The Receiver also communicated extensively with investor victims via telephone and email communications.

As previously communicated, the Receiver's team includes a low hourly rate intern. The Receiver's paralegal has not charged for her time, on this matter. This is illustrated in the invoice (*See* exhibit "A"). Once a distribution is made to the investor victims, the Receiver would like to request the Court's permission to reimburse the paralegal at a rate of \$50.00 per hour which is one-third of her normal hourly rate. The Receiver issued a check to an hourly intern for a total of \$120.00 for various tasks relating to this Receivership such as maintaining the Receivership Facebook and website updates, assisting with documents, and emails.

The Receiver has also paid invoices for the various law firms that have been assisting the Receiver in multiple jurisdictions as noted above which are attached as exhibit "B". The Receiver deems it critical to distribute funds, in a timely manner to ensure critical progress continues. The Receiver issued a check to constable Ian Daley for a total of \$75.00 for service of summons in Randius, Ltd. The Receiver would also like to specifically thank his Dutch counsel who has

continued to assist the Receiver and agreed to a deferred receipt of payment until such time has additional assets are repatriated. The Receiver has also followed that same methodology and not been paid for any time he has expended after December 31, 2018.

#### X. PRAYER FOR RELIEF AND CONCLUSION

The Receiver requests the Court enter the proposed Order filed with this Motion to approve the payment of interim fees and expenses of \$191,179.73 to the Receiver for the ProphetMax Receivership Estate and IB Capital Receivership Estate during the Eleventh Fee Period, which were both reasonable and necessary for the Receiver to fulfill his Court-ordered duties. The actual time from the Receiver if invoiced at his full hourly rate would have been \$220,220.33 That amount has been discounted by invoicing twenty percent (20%) of the Receiver's time at a rate of \$250 per hour. The latter rate is an approximate sixty-two percent (62%) discount to his hourly rate from the Receiver's historical rate resulting in a total reduction of \$29,040.60

Respectfully submitted, GUY HOHMANN

By: /s/ Guy Hohmann

Guy Hohmann State Bar No. 09813100 guyh@hohmannlaw.com 114 West 7<sup>th</sup> Street Suite 1100 Austin, Texas 78701 (512) 495-1438

RECEIVER FOR THE PROPHETMAX AND IB CAPITAL RECEIVERSHIP ESTATES

#### **CERTIFICATE OF CONFERENCE**

	The Receiver	conferred w	th Timothy	Mulreany,	counsel	for the	CFTC,	who	stated the
CFTC	does not take a	position on	he Motion	nor the relie	f sought	herein.			

/s/ Guy Hohmann Guy Hohmann

#### **CERTIFICATE OF SERVICE**

On March 24, 2020, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Western District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

<u>/s/ Guy Hohmann</u> Guy Hohmann



### The Hohmann Law Firm

### **INVOICE**

Norwood Tower 114 West 7th Street, Suite 1100 Austin Texas 78701 Guyh@hohmannlaw.com www.hohmannlaw.com O: 512-495-1438

Number	1123
Start Date	7/28/2019
End Date	2/29/2020
Email	guyh@hohmannlaw.com

#### Bill To:

Guy Hohmann Receiver for ProphetMax and IB Capital 114 West Seventh Street Suite 1100 Austin, Texas 78701 O: 512-495-1438

#### Time Entries

Time Entries	Rate	Hours	Sub
GMH-RCVR 7/29/2019 Review and revise status report and emails to and from Jurjen de Korte regarding  Review and revise same, emails from and to Michel Geurkink regarding Slovakian account assignment and contact for Zsofia Dobos, review letter and attached documents from Peter Varga-Puskas.	\$658.75	5.30	\$3,491 38
RH-PA 7/29/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann with drafting, revising and editing status report and the redacting tenth fee application. Conference with Guy Hohmann regarding same.	\$0.00	4.30	\$0 00
RH-PA 7/30/2019 Ryn Hohmann Paralegal - Continue to assist with status report, fee application, redaction of fee application and draft Order for submission to the Court. Conference with Guy Hohmann regarding same. Conference with Tyler Cunningham intern regarding	\$0.00	5.10	\$0 00
GMH-RCVR 7/31/2019 Review and revise Status Report and Tenth Fee Application, review of redacted invoices, emails with investor victims, review and revise letter to CO Banka (Slovakian bank) and Crystall Worldwide, review of Power of Attorney and letter from Peter Varga-Puskas, email with Dutch counsel regarding	\$658.75	4.70	\$3,096.13
RH-PA 7/31/2019 Ryn Hohmann Paralegal - Conference with Guy Hohmann, finalize status report, fee application, and Order, upload to PACER, Conference with intern Tyler Cunningham regarding . Email to investor regarding update.	\$0.00	4.20	\$0 00

Invoice #1123 Page 1 of 18

Case 1:12-cv-00862-LY Docume	_	20 Page 2 of Hours	of 18 Sub
GMH-RCVR 7/30/2019 Prepare letter to Slovakian Bank and Crystall Worldwide regarding return of Riknik & Sons Account, email to Dutch counsel regarding same, telephone		.75 5.80	\$3,820.75
Mr. de Korte and Mr. Wilts regarding  Review and revise Status Report and Tenth F  Emails with Tim Mulreany regarding Status Report and Tenth Fee Applicati  Zofia Dobos regarding execution of Riknik & Sons Assignment Documents	on, email to Ms.		
RH-PA 8/1/2019		.00 0.10	\$0.00
Ryn Hohmann Paralegal - Email to and from investor regarding address cha our investor spreadsheet accordingly.	ange and update		
GMH-RCVR 8/1/2019 Review of email and letter from the Dutch Prosecutor regarding division of fu	\$658 unds at ING and	.75 1.70	\$1,119.88
allocation with CSF victims, review and revise email to CO Banka, et al.			
GMH-RCVR 8/2/2019	\$658	.75 4.60	\$3,030 25
Emails with CSOB representatives regarding Slovakian Order freezing fund de Korte and Mr. Geurkink regarding . Emails with Mr. de Korte regard. Review and revise Motion to Expand, review of 33 exhibits to be de Korte's affidavit.	ding		
RH-PA	\$0	.00 0.10	\$0.00
8/2/2019 Ryn Hohmann Paralegal - Email to and from investor regarding address chaour investor spreadsheet accordingly.	ange and update		
GMH-RCVR 8/5/2019 Email from Dutch counsel regarding attachment, email to my Dutch counsel regarding . Email from and to repres Banka regarding Riknik & Sons. account balance information. Email with in		.75 5.20	\$3,425 50
regarding payment instructions in the event of his death and review of direct with same.	tive in conjunction		
GMH-RCVR 8/6/2019	\$658	.75 0.40	\$263 50
Emails with the Dutch Prosecutor, Jurjen de Korte and ING's counsel regar payment, payment amount and various other issues in conjunction with sar revise proposed email from Dutch counsel to ING's counsel.			
GMH-RCVR 8/7/2019	\$658	.75 0.20	\$131.75
Emails with Jurjen de Korte regarding			
GMH-RCVR 8/8/2019	\$658	.75 0.40	\$263 50
Telephone conference with Geert Wilts and Dennis Roossien regarding			
RH-PA	\$0	.00 0.10	\$0.00
8/8/2019			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Ryn Hohmann Paralegal - Email to and from several investor regarding stati inquiries, address changes and update our investor spreadsheet accordingly	•		
RH-PA	\$0	.00 2.00	\$0.00
8/12/2019  Ryn Hohmann Paralegal - Email to and from multiple investor regarding sta inquiries, address changes and update our investor spreadsheet according Hohmann with Riknik & Sons organizational documents and other research	ly. Assist Guy		

Invoice #1123 Page 2 of 18

Hohmann with Riknik & Sons organizational documents and other research requests.

Case 1:12-cv-00862-LY Document 166-1 F Time Entries	Filed 03/24/20 Rate	Page 3 of 18 Hours	Sul
GMH-RCVR 8/12/2019 Email from ING's counsel regarding status of IB Capital and Maverick, need to reinstate their charters and various other matters. Emails with Mr. de Korte regarding , emails with UK counsel Anthony Riem regarding . Review of Riknik & Sons organizational documents, emails with Michel Geurkink regarding domicile of Riknik & Sons review of websites of prospective counsel from Seychelles.		5.70	\$3,754 8
GMH-RCVR 8/13/2019 Telephone conference with An hony Riem (UK counsel) regarding	\$658.75	6.20	\$4,084 2
, emails from Geert Wilts regarding recent  Review of emails between the Dutch Prosecutor and my Dutch counsel regarding releasing partial attachment on the ING accounts, multiple emails with Mr. Geurkink and Dutch counsel regarding Riknik & Sons funds in CO Banka, emails with CO Banka representatives regarding same.			
RH-PA 8/13/2019 Ryn Hohmann Paralegal - Email to and from investor regarding address change and update our investor spreadsheet accordingly.	\$0.00	0.10	\$0 0
GMH-RCVR 8/14/2019 Lengthy email from Anthony Riem regarding	\$658.75	0.80	\$527 0
. Responsive email to Mr. Riem and Mr. de Korte regarding . Email from Mr. De Korte regarding			
GMH-RCVR 8/19/2019 Review and revise Motion to Expand Receivership Defendants, review of caselaw in conjunction with same, review email from Jurjen de Korte regarding  Review email from Michel Geurkink regarding his upcoming interview with CO Banka, telephone conference with Tyler Cunningham regarding	\$658.75	5.30	\$3,491 3
RH-PA 8/19/2019 Ryn Hohmann Paralegal - Email to and from investor regarding address change and update our investor spreadsheet accordingly. Conference with Guy Hohmann and assist intern Tyler Cunningham regarding research project.	\$0.00	2.20	\$0 0
GMH-RCVR 8/20/2019 Emails with Michel Geurkink regarding his upcoming meeting with representatives of CO Banka, review and revise Motion to Expand Receivership, and review of caselaw in conjunction with same. Emails with UK counsel regarding  Review of UK counsel's engagement letter and execute same. Review of document request from UK counsel and follow up email regarding same.	\$658.75	4.30	\$2,832.6
GMH-RCVR 8/21/2019 Continue reviewing and revising motion to expand receivership, email to Mr. Mulreany regarding same. Lengthy email from Jurjen de Korte regarding , email to Mr. de Korte and Mr. Geert Wilts regarding same. Continue reviewing selected cases regarding jurisdictional issues.	\$658.75	4.70	\$3,096.1
GMH-RCVR 8/22/2019 Emails from Mr. Geurkink regarding , email to the Dutch Prosecutor regarding next steps in having Riknik & Sons funds released, email to Jurjen de Korte regarding . Review and revise Motion to Expand, emails with UK counsel regarding .	\$658.75	5.60	\$3,689 00

Invoice #1123 Page 3 of 18

Case 1:12-cv-00862-LY Document 166-1 F Time Entries	-11ed 03/24/20 Rate	Page 4 of 18 Hours	Sub
RH-PA 8/22/2019 Ryn Hohmann Paralegal - Email to and from investor regarding address change and update our investor spreadsheet accordingly. Assist Guy Hohmann with drafting, editing revising the Motion to Expand the Receivership.	\$0.00	3.60	\$0 00
GMH-RCVR 8/23/2019 Review of lengthy word document from Mr. de Korte regarding, review and revise Motion to Expand Receivership defendants based upon same. Review caselaw in conjunction with same. Emails to and from Mr. de Korte regarding.	\$658.75	4.90	\$3,227 88
GMH-RCVR 8/26/2019 Review of numerous documents contained within the Dutch prosecutor's files which support motion to expand receivership defendants, emails to and from Mr. de Korte regarding Prepare proposed affidavit of Mr. de Korte with numerous documents from the DPPO as exhibits.	\$658.75	5.70	\$3,754 88
RH-PA 8/26/2019 Ryn Hohmann Paralegal - Email to and from investor regarding address change and update our investor spreadsheet accordingly. Continue to assist Guy Hohmann with drafting, editing revising and preparing exhibits for the Motion to Expand the Receivership.	\$0.00	6.30	\$0 00
GMH-RCVR 8/27/2019 Emails with Michel Geurkink regarding E. van Reydt regarding email to CO Banka and identity of representatives of the Dutch prosecutor's office and email addresses. Email to representatives of CO Banka regarding Geurkink interview report and wire transfers instruction for Riknik funds. Final revisions to Motion to Expand Receivership, and review of various cases cited in same. Email to Jurjen de Korte regarding same.	\$658.75	6.30	\$4,150.13
RH-PA 8/28/2019 Ryn Hohmann Paralegal - Continue to assist Guy Hohmann with drafting, editing, revising Motion to Seal and proposed Order on Motion to Expand the Receivership and Order.	\$0.00	4.20	\$0 00
GMH-RCVR 8/28/2019 Emails with representatives of CO Banka (Kristina Lissova) regarding wire transfer and Slovak order, emails with representatives of the DPPO regarding email from Miss Lissova, emails with Mr. Geurkink regarding same and request for extension of his settlement deadline with the DPPO. Prepare Motion to Seal and Proposed order in conjunction with same, prepare proposed order on Motion to Expand Receivership, emails with Mr. Mulreany revised Mo ion to Expand Receivership and proposed Order.	\$658.75	0.40	\$263 50
GMH-RCVR 8/30/2019 Review email and Mr. de Korte's proposed revisions to Motion to Expand Receivership, review and revise latest affidavit of Mr. de Korte in support of Motion to Expand Receivership.	\$658.75	1.60	\$1,054 00
RH-PA 8/30/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann with latest revisions on the Motion to Expand the Receivership.	\$0.00	1.00	\$0 00
GMH-RCVR 9/1/2019 Email to Mr. de Korte regarding	\$658.75	0.30	\$197.63
GMH-RCVR 9/3/2019 Prepare Motion to Exceed Page Limitations and Proposed Order in conjunction with same. Review of cases speaking to claims against relief defendants, emails with Mr. Geurkink regarding Slovakian freeze order.	\$658.75	1.40	\$922 25

Invoice #1123 Page 4 of 18

Case 1:12-cv-00862-LY Document 166-1 Fine Entries	Rate	Page 5 of 18	Sut
GMH-RCVR 0/4/2019	\$658.75	2.80	\$1,844 5
Emails with Tim Mulreany regarding Motion to Expand Receivership Estate vs Relief			
Defendants, emails with UK counsel regarding same. Review cases regarding ancillary			
actions, telephone conference with Mr. Roossien regarding same. Emails with UK counsel			
egarding .			
GMH-RCVR	\$658.75	0.40	\$263 50
0/5/2019			
Emails with Mr. de Korte regarding			
Email to and from investors regarding status of complaint against ING settlement with the Dutch state. Emails with Mr. de Korte regarding.			
	4		****
GMH-RCVR v/8/2019	\$658.75	0.40	\$263 50
Email to Mr. Mulreany regarding Motion to Expand and possible ancillary actions, email to			
nvestor victims regarding ING settlement objections, and email from and to investors			
egarding status.			
GMH-RCVR	\$658.75	1.20	\$790 50
//9/2019			
mail from Dutch Ministry of Finance regarding wire transfer, emails with Jurjen de Korte			
egarding same, and follow-up email regarding Van der Plas funds. Review translated version	1		
of emails regarding wire transfer documents from the Dutch, and emails with UK counsel			
egarding .			
GMH-RCVR	\$658.75	3.80	\$2,503 25
1/11/2019			
Convert Motion to Expand Receivership to Original Complaint Against Relief Defendants.			
RH-PA	\$0.00	1.00	\$0.00
N/11/2019 Ryn Hohmann Paralegal - Assist Guy Hohman with draft conversion Motion to Expand			
Receivership to Original Complaint Against Relief Defendants.			
RH-PA	\$0.00	0.30	\$0.00
V/12/2019	φυ.υυ	0.50	φυυ
Ryn Hohmann Paralegal - Assist Guy Hohmann with revisions of the Complaint Against			
Relief Defendants.			
GMH-RCVR	\$658.75	4.60	\$3,030 25
0/12/2019			•
Continue revising Complaint Against Relief Defendants, and review of caselaw in connection			
vith same.			
GMH-RCVR	\$658.75	5.30	\$3,491 38
0/13/2019			
Review cases on jurisdiction over prospective defendants. Review and revise Complaint			
gainst Relief Defendants.			
RH-PA	\$0.00	0.40	\$0.00
)/13/2019			
Ryn Hohmann Paralegal - Assist Guy Hohmann with revisions of the Complaint against Relief Defendants.			
			•
GMH-RCVR //14/2019	\$658.75	2.80	\$1,844 50
Ontinue reviewing cases on jurisdiction over prospective defendants. Review and revise			
Complaint against Relief Defendants.			
GMH-RCVR	\$658.75	4.30	\$2,832.63
0/15/2019	ψοσο.73	1.50	Ψ2,002.00
Continue reviewing and revising Receiver's Original Complaint Naming Relief Defendants.			
Review of selected exhibits to be appended to same. Prepare status report.			

Invoice #1123 Page 5 of 18

Case 1:12-cv-00862-LY Document 166-1 F	Rate	Page 6 of 18	Sub
RH-PA 9/15/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann revisions of the Receiver's Original Complaint Naming Relief Defendants, assist in preparing status report.	\$0.00	2.10	\$0 00
GMH-RCVR 9/16/2019 Emails with Jurjen de Korte regarding status report, review and revise same. Review of documents supporting allegations in Complaint Naming Relief Defendants.	\$658.75	3.80	\$2,503 25
GMH-RCVR 9/17/2019 Finalize Complaint Against Relief Defendants. Review Jurjen de Korte 12 page affidavit and 33 exhibits referenced in same. Email to Mr. de Korte regarding	\$658.75	4.30	\$2,832.63
RH-PA 9/17/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann with finalizing the Complaint Against Relief Defendants.	\$0.00	2.30	\$0 00
RH-PA 9/18/2019 Ryn Hohmann Paralegal - Email to and from investor regarding status update.	\$0.00	0.10	\$0 00
GMH-RCVR 9/18/2019 Emails with Mr. de Korte regarding	\$658.75	0.40	\$263 50
RH-PA 9/26/2019 Ryn Hohmann Paralegal - Email to and from investor regarding status update.	\$0.00	0.10	\$0.00
GMH-RCVR 9/30/2019 Review of file stamped copy of Complaint and email to UK counsel regarding initiation of proceeding to obtain Maverick and IB Capital funds.	\$658.75	0.40	\$263 50
RH-PA 9/30/2019 Ryn Hohmann Paralegal - Email to and from investor regarding status update.	\$0.00	0.10	\$0 00
GMH-RCVR 10/1/2019 Judgment of the Court of Appeal at the Hague and emails with Jurjen de Korte regarding same, and posting to the Receivership website. Emails with Mr. de Korte regarding questions regarding portions of translated version of judgment.	\$658.75	2.10	\$1,383 38
GMH-RCVR 10/2/2019  Multiple emails with Jurjen de Korte regarding  Emails with Mr. de Korte regarding  Emails with Mr. de Korte regarding  Emails with Mr. Mulreany regarding Hague judgement. Review of articles from various media sources	\$658.75	2.40	\$1,581 00
RH-PA 10/3/2019 Ryn Hohmann Paralegal - Email to and from investor regarding address update. Draft and complete summons for defendants.	\$0.00	2.10	\$0 00
GMH-RCVR 10/8/2019 Emails to and from Mr. de Korte regarding	\$658.75	0.20	<b>\$</b> 131.75

Invoice #1123 Page 6 of 18

Case 1:12-cv-00862-LY Document 166-1 Filed	_	Page 7 of 18	0.4
Time Entries	Rate	Hours	Sut
GMH-RCVR 10/9/2019 Emails from Geert Wilts and process servers from various countries regarding . Emails with Jurjen regarding his	\$658.75	1.20	\$790 50
GMH-RCVR 10/14/2019 Email from UK counsel regarding  . Review and revise proposed draft affidavit and emails with the Receiver's UK and Dutch counsel regarding . Review of various documents and other emails requested by the Receiver's UK counsel to append to Guy Hohmann's affidavit.	\$658.75	4.30	\$2,832.63
RH-PA 10/14/2019 Ryn Hohmann Paralegal -Assist Guy Hohmann with draft affidavit.	\$0.00	1.10	\$0 00
GMH-RCVR 10/15/2019 Emails with Seychelles counsel regarding , and emails to and from investor victims regarding various topics. Emails from Mr. Geurkink regarding .	\$658.75	2.80	\$1,844 50
GMH-RCVR 10/16/2019 Emails to and from Seychelles counsel regarding and any and revise same. Emails to and from Mr. Geurkink and his counsel regarding organizational documents for Riknik & Sons and directors and officers of that company from inception to the present. Email to Ms. Dobos' counsel regarding Complaint Against Relief Defendants and Assignment Documents and acceptance of service of Summons and Complaint. Emails to and from UK counsel regarding service on Ms. Moutaouakkil.	\$658.75	1.60	\$1,054 00
GMH-RCVR 10/17/2019 Emails with Zoltan Tenk regarding service of process on Riknik & Sons and various administrative matters. Emails with London counsel regarding  Emails with Jurjen de Korte regarding same. Review of exhibits to be appended to affidavit.	\$658.75	1.80	\$1,185.75
GMH-RCVR 10/18/2019 Emails with counsel for Zsofia Dobos regarding accepting service of process for Mrs. Dobos and Riknik and execution of assignments. Emails with Massachusetts constable regarding service on Ms. Weare.	\$658.75	0.60	\$395 25
GMH-RCVR 10/19/2019 Emails with process server regarding service upon Randius Ltd. Emails with Dutch counsel regarding.	\$658.75	0.30	\$197.63
GMH-RCVR 10/21/2019 Emails with Dutch counsel regarding  Emails with constable from Massachusetts regarding attempted service on Jennifer Marie Weare. Emails with Mr. Geurkink regarding and review of same. Emails with my Dutch counsel regarding  .	\$658.75	2.80	\$1,844 50
RH-PA 10/22/2019 Ryn Hohmann Paralegal - Email to and from investor regarding contact information and status undate	\$0.00	0.10	\$0 00

Invoice #1123 Page 7 of 18

status update.

Case 1:12-cv-00862-LY Document 166-1 Fi	-11eu 03/24/20 Rate	Page 8 of 18	Sul
GMH-RCVR 10/22/2019 Emails with UK counsel regarding  . Email to Mr. McLeod regarding same. Telephone conference with Mr. McLeod regarding  . Emails with Geert Wilts regarding  . Emails with Mr. Mulreany regarding upcoming status conference, email to Mr. Echadi regarding recently filed complaint and additional assignments from his aunt, mother and Advanced Neotex, Ltd.	\$658.75	3.60	\$2,371 5
GMH-RCVR 10/23/2019 Review various emails regarding latest efforts to serve relief defendants, prepare outline of matters to discuss at upcoming status conference. Telephone conference with Tim Mulreany regarding same. Telephone conference U.S. Postal Inspector regarding victims list. Attend status conference.	\$658.75	4.30	\$2,832.6
RH-PA 10/23/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann with review various emails regarding latest efforts to serve relief defendants. Attend telephone conference with Tim Mulreany and Guy Hohmann regarding same. Telephone conference with Guy Hohmann and U.S. Postal Inspector regarding victims list.	\$0.00	2.30	\$0 0
RH-PA 10/24/2019 Ryn Hohmann Paralegal - Attend telephone conference with Tim Mulreany and Guy Hohmann regarding Motion for Turnover to be filed against ING, and various other matters discussed at the conference. Assist review and revise Guy Hohmann's affidavit for filing in Restoration proceeding in the UK. Prepare investor spreadsheet for U.S. Postal Inspector.	\$0.00	4.50	\$0 0
GMH-RCVR 10/24/2019 Telephone conference with Tim Mulreany regarding Motion for Turnover to be filed against ING, and various other matters discussed at the status conference. Telephone conference with Jurjen de Korte regarding  Review and revise affidavit for filing in Restoration proceeding in the UK. Review of exhibits to be appended to same. Emails with UK counsel regarding same.	\$658.75	3.30	\$2,173 8
GMH-RCVR 10/25/2019 Review and revise Motion for Turnover Order. Review selected cases in conjunction with same. Review and revise proposed responses to investors' emails. Review of Investor List and conference with Ryn Hohmann regarding same. Review and revise Restoration filing for IB Capital and Maverick to be made in the UK and emails regarding same.	\$658.75	6.30	\$4,150.1
RH-PA 10/25/2019 Ryn Hohmann Paralegal - Assist with draft and edits of the Motion for Turnover Order. Conference with Guy Hohmann regarding Investor List.	\$0.00	1.30	\$0.0
GMH-RCVR 10/26/2019 Continue reviewing and revising Motion for Turnover Order and reviewing cases and statutes in conjunction with same. Emails with Dutch counsel regarding service on Relief Defendants Emails with process services and Seychelles counsel regarding same. Travel to Federal Express offices and transmit three new summons (at no charge.)	\$658.75	3.20	\$2,108 0
GMH-RCVR 10/28/2019 Review and revise GMH affidavit in support of Turnover Motion. Review of various documents to append to same. Review of cases to be cited in same. Emails with Process Server regarding service on Riknik & Sons. Emails with process server regarding service on Ms. Weare. Emails with Cypress counsel regarding	\$658.75	6.20	\$4,084 2

Invoice #1123 Page 8 of 18

Case 1:12-cv-00862-LY Document 166-1 File	ed 03/24/20 Rate	Page 9 of 18 Hours	Sub
RH-PA 10/28/2019 Ryn Hohmann Paralegal - Continue to assist with revision of Guy Hohmann affidavit in support of Turnover Motion. Finalize copy of investor spreadsheet and email to U.S. Postal nspector.	\$0.00	2.20	\$0 00
GMH-RCVR 10/29/2019 Continue reviewing Turnover Cases regarding the court's ability to demand turnover of assets from foreign jurisdictions. Review and revise witness statement and review of attached exhibits to be filed in UK restoration proceeding. Review and revise Motion for Turnover and affidavit in support of same.	\$658.75	4.40	\$2,898 50
GMH-RCVR 10/30/2019 Emails with Process servers in Hungary and the Seychelles. Review and revise Turnover Motion and exhibits to append to affidavit.	\$658.75	3.80	\$2,503 25
RH-PA 10/30/2019 Ryn Hohmann Paralegal - Email to from investor regarding change in contact information, update investment spreadsheet accordingly.	\$0.00	0.20	\$0 00
GMH-RCVR 10/31/2019 Emails from Cypress counsel regarding . Review and fill out papers regarding service under the Hague Convention email to Cypress counsel regarding .	\$658.75	0.80	\$527 00
GMH-RCVR 11/4/2019 Emails from Seychelles counsel regarding Motion to File under seal and prepare proposed order in conjunction with same. Conference with Ryn Hohmann regarding	\$658.75	2.20	\$1,449 25
RH-PA 11/4/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann with Motion to Seal, Order to Seal, Motion for Take over Supplemental Relief, Affidavit, Exhibits A-A6, Exhibit 2 and Order for Motion for Take over Supplemental Relief, edit, revise documents. Conference with intern Tyler Cunningham regarding updating the Receivership website and Facebook pages regarding Receiver's Original Complaint Naming Relief Defendants. Email several investors regarding website posting.	\$0.00	8.00	\$0 00
RH-PA 11/5/2019 Ryn Hohmann Paralegal - Finalize all motions, orders and exhibits for court filing on 11.05.2019.	\$0.00	2.00	\$0 00
GMH-RCVR 11/5/2019 Finalize Turnover Motion and my affidavit and proposed order, email with Emad Echadi, his Dutch counsel and Mr. Geurkink regarding certificate of conference. Email with Mr. Mulreany regarding same.	\$658.75	3.60	\$2,371 50
GMH-RCVR 11/6/2019 Email from and to counsel for Rabbia Moutaouakkil, regarding possible assignments. Email with Jurjen de Korte regarding	\$658.75	0.80	\$527 00
RH-PA 11/6/2019 Ryn Hohmann Paralegal - Email to from investor regarding update and email to from investor regarding change contact information, update investment spreadsheet accordingly, update investment spreadsheet accordingly.	\$0.00	0.30	\$0 00

Invoice #1123 Page 9 of 18

investment spreadsheet accordingly.

Case 1:12-cv-00862-LY Document 166-1 F	Filed 03/24/20 Rate	Page 10 of 18 Hours	Sub
RH-PA 11/7/2019 Ryn Hohmann Paralegal - Conference with Guy Hohmann, email to Receiver's Local Dutch Counsel and Tim Mulreany regarding filing on 11.05.19: Motions Orders, and Exhibits and share electronically through a secure shared repository. Assist with edits, revisions to Joint Status Report.	\$0.00	2.00	\$0 00
GMH-RCVR 11/7/2019 Prepare letter to Emad Echadi and Mr. Geurkink's counsel transmitting Motion to File under Seal and Motion for Turnover Order.	\$658.75	0.60	\$395 25
RH-PA 11/8/2019 Ryn Hohmann Paralegal - Conference with Guy Hohmann assist with Joint Status Report and electronically file in the Federal Court System.	\$0.00	1.00	\$0 00
GMH-RCVR 11/12/2019 Review of 16 page letter from Jurjen de Korte to the Dutch Prosecutor regarding CSF/ING funds allocation. Travel to courthouse and obtain certified copies of turnover order and Motion for Turnover Order. Review and revise letter to ING's registered agent in Texas regarding same, and wiring instructions. Email to ING's Dutch counsel regarding same. Prepare email to ING's Dutch counsel transmitting cer ified turnover order, Motion for Turnover Order and wiring instructions.		4.80	\$3,162 00
GMH-RCVR 11/14/2019 Emails to and from ING's American counsel regarding Turnover Order.	\$658.75	0.20	\$131.75
RH-PA 11/14/2019 Ryn Hohmann Paralegal - Assist Guy Hohmann with letter and email with attachments and enclosures to ING representatives regarding Turnover Order.	\$0.00	1.00	\$0 00
GMH-RCVR 11/15/2019 Telephone conference with ING's American counsel (Carlos Soltero) regarding Turnover Order. Motion for Contempt filing, global resolution, and follow-up with Dutch Prosecutor. Review information on timing of Restoration of Maverick and IB Capital. Emails with Jurjen de Korte regarding  Emails with multiple investor victims regarding status and recent developments.	\$658.75 e	3.40	\$2,239.75
GMH-RCVR 11/16/2019 Begin preparation of Second Motion for Turnover Order in conjunction with CSOB account. Review of ING's Motion for Leave to File under Seal, Motion to Stay or Vacate Turnover Order, and proposed orders in conjunction with same, emails with Judge Yeakel's clerk and with ING's counsel regarding opposition to same. Email with Mr. de Korte regarding	\$658.75	3.70	\$2,437 38
GMH-RCVR 11/18/2019 Begin preparing response to ING's Motion to Stay or Vacate Turnover Order, and review of cases cited in same. Emails to and from ING's counsel regarding discovery. Teleconference with ING's counsel regarding possible resolution. Review of various materials from searches regarding ING's contacts with Texas and the United States. Review of cases cited in ING's briefing. Prepare list of 30(b)6 deposition topics for ING corporate representative.		6.70	\$4,413.63
RH-PA 11/19/2019 Ryn Hohmann - Paralegal - Conference with Intern Tyler Cunningham regarding research for Response to ING's Motion to Stay or Vacate Turnover Order.	\$0.00	0.30	\$0 00
GMH-RCVR 11/19/2019 Emails with various investors regarding status of recent filings. Review of various cases to be cited in response to ING's motion to stay, and continue preparing response.	\$658.75	6.30	\$4,150.13

Invoice #1123 Page 10 of 18

\$658.75 \$0.00 \$0.00	7.40 4.00 8.00 7.10	\$4,874.75 \$0.00 \$0.00 \$4,677.13
\$0.00	8.00	\$0.00
\$0.00	8.00	\$0 0
\$0.00	8.00	\$0 0
\$658.75	7.10	\$4,677.1
\$658.75	7.10	\$4,677.1
\$658.75	6.80	\$4,479 5
\$0.00	6.30	\$0.0
\$658.75	0.10	\$65 8
\$658.75	4.60	\$3,030 2
\$658.75	2.10	\$1,383 3
	\$658.75 \$658.75	\$0.00 6.30 \$658.75 0.10 \$658.75 4.60

Invoice #1123 Page 11 of 18

Case 1:12-cv-00862-LY Document 166-1 Fil	Rate	Page 12 of 18 Hours	Sub
GMH-RCVR 11/26/2019 Review and revise summary of recent filings to be posted on the ProphetMax website.	\$658.75	1.20	\$790 50
Obtain revised summons for Ms. Weare and emails with Massachusetts process server regarding same. Emails with my Dutch counsel regarding			
RH-PA 11/26/2019	\$0.00	0.10	\$0 00
Ryn Hohmann - Paralegal Conference with Intern Tyler Cunningham regarding updating Receivership and Hohmann Law Facebook sites as well as the ProphetMax Receivership website with announcements and posting recent court filings.			
GMH-RCVR 11/27/2019	\$658.75	2.80	\$1,844 50
Review of investors' emails and list of questions. Emails to Mr. de Korte regarding , prepare for upcoming conference call with ING's counsel and my Dutch counsel. Telephone conference with ING's counsel regarding possible resolu ion of Motion for Turnover. Emails with investor victims regarding status and recent filings.			
GMH-RCVR 11/29/2019	\$658.75	0.70	\$461.13
Emails and telephone conference with Andrew McLeod regarding and review of emails in conjunction with same and status of restoration proceedings. Review of Mr. de Korte's memorandum regarding topics for upcoming meeting with ING and DPPO. Email to ING's counsel regarding same.			
RH-PA 11/30/2019	\$0.00	1.30	\$0 00
Ryn Hohmann Paralegal - Respond to numerous investors regarding updates, questions and address changes, prepare draft update for the Receivership website for Receiver's review.			
RH-PA 12/2/2019	\$0.00	0.10	\$0 00
Ryn Hohmann Paralegal - Conference with Guy Hohmann regarding ING's counsel response, log onto to Texas Western District Federal Court system and retrieve court filings, print and save for the Receiver.			
GMH-RCVR 12/2/2019	\$658.75	1.80	\$1,185.75
Prepare Motion for Modification of Fee Arrangement. Review of ING's reply to response to Motion to Stay or Vacate Turnover Order.			
GMH-RCVR 12/3/2019	\$658.75	3.60	\$2,371 50
Emails with Jurjen de Korte regarding  . Telephone conference with Mr. de Korte and Mr. Wilts regarding  . Telephone conference with ING's counsel regarding possible			
meeting in Amsterdam and agenda for same. Telephone conference with Mr. de Korte and Mr. Wilts regarding . Continue preparing Motion to Modify Fee Arrangement, and Proposed Order. Prepare Motion to Seal and Proposed Order.			
RH-PA 12/3/2019	\$0.00	0.20	\$0 00
Ryn Hohmann Paralegal - Email to and from investors regarding address changes and updates. Update investor spreadsheet accordingly.			
GMH-RCVR 12/4/2019	\$658.75	1.40	\$922 25
Email from Andrew McLeod regarding and review of same. Telephone conference with Mr. McLeod regarding same.			
Emails with Mr. de Korte regarding  . Emails with ING's counsel regarding same.			

Invoice #1123 Page 12 of 18

Case 1:12-cv-00862-LY Document 166-1 File	Rate	Page 13 of 18 Hours	Sub
GMH-RCVR 12/5/2019 Emails with Andrew McLeod regarding . Telephone conference with Andrew McLeod regarding	\$658.75	2.10	\$1,383 3
GMH-RCVR 12/6/2019 Email copy of Dennis Roossien's opinion letter for submission to the Registrar of Companies to Andrew McLeod. Emails with Dennis Roossien regarding same. Email to Mr. McLeod regarding  Telephone conference with Judge Yeakel and ING's counsel regarding ING's recently filed pleadings and suggestion of 30 day standstill agreement. Telephone Carlos Solteno and Todd Fishman regarding proposed motion regarding same.	\$658.75	3.60	\$2,371 50
GMH-RCVR 12/9/2019 Email from ING's counsel regarding proposed Motion (to preserve status quo.) Review and revise same. Emails with ING's counsel regarding same and proposed Amsterdam meeting date. Review and Revise Proposed Order, emails with ING's counsel regarding same. Telephone conference with Dennis Roossien regarding	\$658.75	1.50	\$988.13
GMH-RCVR 12/10/2019 Emails with Mr. de Korte regarding . Emails with ING's counsel regarding conference call to discuss partial resolution.	\$658.75	0.20	\$131.75
RH-PA 12/11/2019 Ryn Hohmann Paralegal - Conference with Intern Tyler Cunningham regarding posts to Receivership Facebook and Hohmann site.	\$0.00	0.10	\$0.00
GMH-RCVR 12/12/2019 Emails from and to investor victims regarding status and recent postings to website. Prepare for and telephone conference with ING's counsel regarding partial resolution of Motion for Turnover issues.	\$658.75	1.10	\$724.6
RH-PA 12/12/2019 Ryn Hohmann Paralegal - Conference wi h Guy Hohmann and Intern Tyler Cunningham regarding updates to the ProphetMax Facebook site, Hohmann Law Facebook site, and the Receivership website.	\$0.00	0.30	\$0 00
RH-PA 12/12/2019 Ryn Hohmann Paralegal - Email to from investor regarding address and telephone number changes as well as updates.	\$0.00	0.10	\$0.00
GMH-RCVR 12/13/2019 Emails from and to investor victims. Prepare letter to ING's counsel and the DPPO regarding recent telephone conference, partial settlement conditions of DPPO partial lifting of the attachment, selected portions of Permanent Injunction Order and upcoming 1/6/2020 meeting. Emails with Mr. de Korte regarding  Review of ING article. Emails with Constable Daley regarding attempted service on Ms. Weare.	\$658.75	3.20	\$2,108 00
GMH-RCVR 12/17/2019 Review emails from UK counsel regarding  Review Consent Order and telephone conference with Mr. Roossien regarding Review of Roossien opinion letter. Emails with UK counsel regarding Email from UK counsel and review letters from UK counsel to the UK Treasury Solicitor regarding restoration of Maverick and IB Capital to the Registrar of Companies.	\$658.75	1.80	\$1,185.7

Invoice #1123 Page 13 of 18

Time Entries	Case 1:12-cv-00862-l	LY Document 100-1	Rate	Hours	Sub
witness stateme	ference with Andrew McLeod and Den Telephone conference with Dennis Ro Email Mr. Roossie ent. Review incoming correspondence cess and 1/6/2020 meeting.	oossien regarding en list of investor victims and earlier	\$658.75	2.30	\$1,515.1
with the DPPO, alternatives to s	ference with Todd Fishman regarding u , emails to and from UK counsel regan same and recent correspondence to the ding same and joint report to the court	rding , possible ne Treasury Solicitor. Email to Mr.	\$658.75 w-up	1.20	\$790 5
	nnis Roossien with draft affidavits and view of same, and emails to and from		\$658.75 JK	1.20	\$790 5
GMH-RCVR 12/29/2019 Emails with ING	G's counsel regarding Joint Advisory to	o the Court. Review and revise same	\$658.75 e.	0.30	\$197.63
GMH-RCVR 1/1/2020 Emails with Sey	ychelles counsel regarding		\$658.75	0.30	\$197.6
RH-PA 1/9/2020 Ryn Hohmann F updates.	Paralegal - Email to and from investor	s regarding address changes and	\$0.00	0.20	\$0.00
regarding letter	G's counsel regarding status of draft a from the Treasury Solicitor regarding w of correspondence regarding same.	reinstatement of Maverick and follow		1.30	\$856 38
GMH-RCVR 1/17/2020 Emails with inve	estors and review and revise proposed	l update.	\$658.75	0.30	\$197.60
RH-PA 1/17/2020 Ryn Hohmann F and updates.	Paralegal - Email to and from multiple	investors regarding address change	\$0.00 es	0.30	\$0.00
GMH-RCVR 1/23/2020 Email to and fro	om ING's counsel regarding timing on	delivery of draft agreement.	\$658.75	0.10	\$65 88
RH-PA 1/23/2020 Ryn Hohmann F	Paralegal - Assist Guy Hohmann with	draft of Status Report due 1/31/201	<b>\$</b> 0.00	2.00	\$0.00
GMH-RCVR 1/27/2020 Email to and fro	om ING's counsel regarding status of o	draft agreement.	\$658.75	0.10	\$65 88
-	Paralegal - Assist with status report, v n Guy Hohmann regarding same.	writing, drafting, editing, revising and	\$0.00	4.00	\$0 00

Invoice #1123 Page 14 of 18

Case 1:12-cv-00862-LY Document 166-1 Time Entries	Filed 03/24/20 Rate	Page 15 of 18 Hours	Sub
GMH-RCVR 1/29/2020 Begin preparation of Status Report and review of various documents and emails in connection with same. Review of email and draft advisory to the court and email with ING's counsel regarding same. Emails from investor victims, email from ING's counsel, email from putch counsel, and translated email from the DPPO. Email to my Dutch counsel regarding same and next steps		2.10	\$1,383 3
RH-PA 1/30/2020 Ryn Hohmann Paralegal - Revise, edit and create exhibits for status report. Conference wi Guy Hohmann regarding same.	\$0.00 rith	3.00	\$0.00
GMH-RCVR 1/30/2020 Emails with ING's counsel regarding status of Agreement.	\$658.75	0.10	\$65 88
RH-PA 1/31/2020 Ryn Hohmann Paralegal - Finalize status report, upload to PACER, conference with Guy Hohmann, conference with Tyler Cunningham regarding posting to Receivership Website a announce on Receivership Facebook sites. Email to from investors regarding status report		2.20	\$0 00
GMH-RCVR 2/3/2020 Review of proposed agreements and email to Dutch Counsel regarding same.	\$658.75	0.40	\$263 50
GMH-RCVR 2/4/2020 Review of proposed agreements and email to ING's Counsel regarding same.	\$658.75	0.60	\$395 29
GMH-RCVR 2/5/2020 Email to Ms. Dobos' counsel regarding obtaining contact person from the Hungarian Tax Authorities. Begin preparing Notice of Default and Motion for Default Judgments, email with Constable Daley regarding private investigator services.	\$658.75	3.80	\$2,503 2
GMH-RCVR 2/6/2020 Review and revise Notices of Default, Motions for Default, Affidavits in Support of Same an Default Judgements. Review of numerous documents to fill in correct amounts in judgmen and emails to and from Jurjen de Korte regarding same and evidence from the DPPO. Emails to and telephone conference with Dennis Roossien regarding			
2/7/2020 Emails to and from Jurjen de Korte regarding . Review and rev	\$658.75	3.20	\$2,108 00
orders on Default Judgement Motions.  GMH-RCVR 2/10/2020 Emails from UK counsel regarding  Email to my UK counsel regarding  Review and revise five filings of default judgment proceeding documents and associated motions, notices, affidavits and orders and conference with Ryn Hohmann regarding	\$658.75	4.80	\$3,162 00
RH-PA 2/10/2020 Ryn Hohmann Paralegal - Assist Guy Hohmann preparing numerous court filing for default judgments.	\$0.00	6.40	\$0 00

Invoice #1123 Page 15 of 18

Case 1:12-cv-00862-LY Document 166-1 F	Rate	Page 16 of 18 Hours	Sub
RH-PA 2/11/2020 Ryn Hohmann Paralegal - Continue to assist Guy Hohmann preparing numerous court filing for default judgments.	\$0.00	4.30	\$0 00
GMH-RCVR 2/11/2020 Review selected cases on entries of default and default judgment, emails with investor victims regarding status, emails with UK and Dutch counsel regarding Telephone conference with UK and Dutch counsel regarding restora ion emails with UK counsel and Dennis Roossien regarding . Review and revise five requests for Entry of Default, Affidavit in Support and Entries of Default. Conference with clerk's office regarding same. Telephone conference with process server regarding service on Ms. Weare and his affidavit of service in connection with same. Review of previous affidavits, review of latest draft of agreement with ING, emails and telephone conference with ING's counsel regarding same. Review and revise Motion to Amend Fee Agreement.	\$658.75	9.10	\$5,994.63
GMH-RCVR 2/12/2020 File request for Entries of Default against five defendants, emails to and from investors regarding status, emails with Tim Mulreany regarding National Futures Association ("NFA") assistance with interim distribution, emails with Geurkink and his counsel regarding Motion to Amend Fee Agreement.	\$658.75	1.00	\$658.75
RH-PA 2/12/2020 Ryn Hohmann Paralegal - Email to from investor regarding updating contact information. Update contact information in our system.	\$0.00	0.10	\$0 00
GMH-RCVR 2/13/2020 Finalize five default judgment motions and review and revise affidavits and proposed orders in connection with same. Emails with Constable Daley regarding Proof of Service, affidavit for Jennifer Marie Weare and telephone conference with Mr. Daley regarding same, emails with investor victims regarding status.	\$658.75	3.90	\$2,569.13
GMH-RCVR 2/14/2020 Finalize and file five default judgment motions.	\$658.75	2.40	\$1,581 00
GMH-RCVR 2/17/2020 Prepare correspondence to all five judgment debtors transmitting default judgment filing.	\$658.75	0.60	\$395 25
RH-PA 2/17/2020 Ryn Hohmann Paralegal - Preparing Request for Entries of Default, Entry of Defaults, Motion for Default Judgments, Affidavits, Exhibits, and Proposed Orders of Default Judgment, Letters of transmittal for five different defendants, and travel to UPS store to mail interna ionally.	\$0.00	6.40	\$0 00
RH-PA 2/18/2020 Ryn Hohmann Paralegal - Continue to prepare Preparing Request for Entries of Default, Entry of Defaults, Motion for Default Judgments, Affidavits, Exhibits, and Proposed Orders of Default Judgment, Letters of transmittal for one defendants, and travel to UPS store to mail interna ionally.	\$0.00	1.50	\$0 00
GMH-RCVR 2/18/2020 Finalize default motions against Riknik & Sons. Telephone conference with Clerk's office regarding status of default judgements, emails with the DPPO and my Dutch counsel regarding status of Van der Plaas funds and agreements relating to wire transfer of IB Capita and Maverick funds. Email with ING's counsel regarding same, emails with Jurjen de Korte regarding	\$658.75	4.20	\$2,766.75

Invoice #1123 Page 16 of 18

Time Entries	Rate	Hours	Sub
GMH-RCVR 2/19/2020 Continue reviewing and revising default judgement motions and transmittar letters in connection with same, review and revise affidavits in support of transmitted motions, review and revise Motion to Modify Fee Arrangement and prepare proposed Order. Review and revise unopposed Motion to Leave to File Under Seal, emails with Jurjen de Korte regarding  Review and revise default filings against Ms. Weare and Riknik & Sons, Ltd. Review and revise affidavits in support of Motion for Entry of Default and Motion for Entry of Default Judgment. Emails to and from Mr. de Korte regarding the  Review select provisions of Slovakian law regarding recognition of foreign judgments. Review and revise Motion to Amend Fee Arrangement, Unopposed Motion to File In Camera and prepare proposed Order in connection with same. Telephone conference with Tim Mulreany regarding his voicemail.	\$658.75	4.20	\$2,766.7
RH-PA 2/19/2020 Ryn Hohmann Paralegal - Prepare Request for Entries of Default, Entry of Defaults, Motion for Default Judgments, Affidavits, Exhibits, and Proposed Orders of Default Judgment, Letters of transmittal for two defendants.	\$0.00	2.40	\$0.0
GMH-RCVR 2/20/2020 Lengthy email to Ms. Dobos' counsel regarding motion for summary judgment against Riknik & Sons and possible joinder in same. Email from investors regarding status, voicemails from and to Clerk's office regarding filings. Review and revise Summons for Randius, Ltd. Conference with clerk's office regarding same. Review and revise Motion for Modifica ion to Fee Arrangement and prepare proposed order in connection with same. Prepare Motion to File Under Seal and proposed Order in connection with same.	\$658.75	5.30	\$3,491 3
GMH-RCVR 2/21/2020 Prepare motion to file under seal and proposed order, prepare proposed order on Motion for Modification of Fee Arrangement, emails with Constable Daley regarding service on Randius, Ltd. care of Jennifer Marie Weare. Emails to and from UK counsel and Mr. Roossien regarding  Review info in connection with prospective counsel in Cypress and Slovakia. Voicemail to and emails to and from Mr. Mulreany regarding Motion to File Under Seal.	\$658.75	5.60	\$3,689 00
GMH-RCVR 2/24/2020 Email to and from ING's counsel regarding status of agreements and upcoming deadline for next advisory to the court. Travel to courthouse to obtain file stamped copies of recently filed motion and emails to and from Mr. Echade. Email from Mr. de Korte regarding affidavit regarding  Prepare responsive email and prepare chart of Entries of Default and proposed default judgment amounts. Email to clerk's office regarding same and motion for modification.	\$658.75	4.80	\$3,162 00
GMH-RCVR 2/25/2020 Review of selected portions of Motion for Interim Distributions from Stanford Ponzi scheme and conference with Ryn Hohmann regarding modifications to same, email with Tim Mulreany regarding Motion and Proposed Order regarding the NFA to distribute checks, emails with ING's counsel regarding status of agreement between ING and the DPPO and upcoming status report. Review of proposed status report and email with ING's counsel regarding same, email with Slovakian counsel regarding . Emails with Mr. Echade's and Essadia Moutaouakki's counsel regarding assignments, finalize Motion for Entry for Default Judgement against Jennifer Marie Weare. Emails from and to investor victims.	\$658.75	4.30	\$2,832.6
GMH-RCVR 2/27/2020 Emails from and to Tim Mulreany regarding language regarding NFA involvement, recent emails with Echade and his aunt and retention of counsel with offices in Slovakia and Budapest. Telephone conference with clerk's office regarding changing signature lines on default judgments and revise same and file.	\$658.75	1.30	\$856 3

Invoice #1123 Page 17 of 18

Time Entries	Case 1:12-cv-00862-LY	Document 166-1	Filed 03/24/20 Rate	Page 18 of 1	.8 Sub
Default Judgm	Paralegal - Prepare Default Judgment, Ordent, Affidavit in Support of Default Judgment to send to the defendant with copies of doc	t for Guy Hohmann. Draft letter		3.00	\$0 00
	. Echade and Essadia Moutaouakki's couns g assignments for Neotex, Essadia Moutao accounts.	0 0 0	\$658.75 Ir	2.90	\$1,910 38
			Time Entries Total	458.70	\$220,220.35
			Т	otal (USD)	\$220,220.35

Paid

Balance

\$0.00

\$220,220.35

#### Terms & Conditions

Net 30

As set forth on page 7 of the Eleventh Fee Application, the Receiver has discounted 20% of the time he expended during the Eleventh Fee Period by 62% of his historical rate.

\$220,220.33

- (29,040.60)

\$191,179.73

Invoice #1123 Page 18 of 18



The Homann Law Firm De heer G. Hohmann 114 W. 7th Street Suite 1100 TX 78704 Austin Texas

#### Amsterdam, 4 March 2020

Matter : Hohmann / IB Capital, Geurkink, Echadi

Our reference : 20170590

Attorney : J.Ph. de Korte

Fee Note: 2000967

#### Legal services over February 2020

Fees € 6,327.00

Total amount € 6,327.00

Payments should be made within 14 days to Van Oosten Schulz De Korte Advocaten B.V. at IBAN NL56 RABO 0158 0891 62 BIC: RABONL2U VAT: NL8143.83.129.B.01



SOLICITORS

4TH FLOOR, 90 CHANCERY LANE, LONDON WC2A 1EU
TEL: +44 (0) 20 7831 2691 FAX: +44 (0) 20 7404 9435
DX: 0038 LDE E-MAIL: enquiries@pcblitigation.com

The Hohmann Law Firm Norwood Tower 114 West 7th Street Suite 1100 Austin, Texas 78701 United States of America

Date: 31 January 2020

Ref: AM/H130-1

Invoice No: 11189

#### Re: Guy M Hohmann as receiver of IB Capital (FX) LLP

Details	Costs	Disbursements	VAT	VAT Rate
To Provision of Legal Services				
Costs as at 31.01.2020	£1,980.00		£0.00	0%
Adam Al-Attar Counsel fees 03.12.19 to 13.12.19 Registrar of Companies fees Refund of Court fee		£1,500.00 £700.00 (£280.00)	£0.00 £0.00 £0.00	0% 0% 0%
Details for Direct Payment:	Total Costs	Total	Total VAT	

Account Name: PCB Litigation LLP Bank: National Westminster Bank

Sort Code: 60-08-01 Account No: 66279038

Swift Code/BIC: NWBK GB 2L

IBAN: GB10 NWBK 6008 0166 2790 38

 Total Costs
 Total Disbursements
 Total VAT

 £1,980.00
 £1,920.00
 £0.00

Total Charge £3,900.00

funds held on account balance due

£0.00 £3,900.00

for and on behalf of PCB Litigation LLP

Your attention is drawn to notes overleaf relating to your rights

VAT Registration No. 893 8124 88

# michaelkyprianou Advocates - Legal Consultants

#### MICHAEL KYPRIANOU & CO LLC

2 Agias Elenis Stasinos, 6th & 7th floor 1060, Cyprus

PO Box: 21150, 1502

Phone Number: +357 22 44 77 77, Fax Number: +357 22 76 78 80

Website; www.kyprianou.com Email; info@kyprianou.com VAT Number: 10237290W

#### **Customer Details**

THE HOHMANN LAW FIRM Norwood Tower 114 West 7th Street Suite 1100 Austin, Texas 78701

#### INVOICE: N/I6587

Date Issued: 07-02-2020 Our Reference: 10314N

#### (10314N)/THE HOHMANN LAW FIRM

Professional Services		Fees	Expenses	Disburse ments
Agreed fees for attempting service on Randius Ltd action A19CV 930LY before the United States District of Texas	of the summons in civil ct Court for the Western	400,00		20,00
	Totals			
	Totals	400.00		20.00
	Totals Total before VAT V.A.T Total		00,00	20,00

ISSUED BY	RECIPIENT
Please Remit to Bank of Cyprus A/C: 0382-01-014511, IBAN: C BCYPCY2N.Invoices not settled within 30 days are subject to it	



Ross Tower 500 N. Akard Street, Suite 3800 Dallas, Texas 75201-6659 Main 214.855.7500 Fax 214.855.7584 munsch.com

Guy Hohmann, Receiver The Hohmann Law Firm Norwood Tower 114 West 7th Street Suite 1100 Austin, TX 78701

> Invoice Date: Invoice Number:

February 25, 2020

10416889

Matter Number:

018488.00001

For Professional Services through January 31, 2020

Client:

Guy Hohmann, Receiver

Matter:

I.B. Capital

 Total Fees
 \$ 3,795.00

 Total Costs
 \$ 25.00

 Grand Total Due
 \$ 3,820.00

Wire Instructions: Bank of Texas, N.A.

ABA Routing Number: 111014325 Account Number: 2880510762 Swift Code: BAOKUS44

File Number and Invoice Number Required.

Federal ID Number: 75-2096964

Remittance Address: Accounting

Munsch Hardt Kopf & Harr, P.C. 500 N. Akard St., Suite 3800 Dallas, TX 75201-6659

#### Case 1:12-cv-00862-LY Document 166-2 Filed 03/24/20 Page 5 of 5



Ross Tower 500 N. Akard Street, Suite 3800 Dallas, Texas 75201-6659 Main 214.855.7500 Fax 214.855.7584 munsch.com

Guy Hohmann, Receiver The Hohmann Law Firm Norwood Tower 114 West 7th Street Suite 1100 Austin, TX 78701

> Invoice Date: Invoice Number: Matter Number:

March 4, 2020 10417200 018488.00001

For Professional Services through February 29, 2020

Client:

Guy Hohmann, Receiver

Matter:

I.B. Capital

Total Fees	\$ 1,400.00
Total Amount Due This Invoice	\$ 1,400.00
Outstanding Invoices	\$ 3,820.00
Grand Total Due	\$ 5,220.00

Wire Instructions:

Bank of Texas, N.A.

ABA Routing Number: 111014325 Account Number: 2880510762 Swift Code: BAOKUS44

File Number and Invoice Number Required.

Federal ID Number: 75-2096964

Remittance Address:

Accounting Munsch Hardt Kopf & Harr, P.C. 500 N. Akard St., Suite 3800 Dallas, TX 75201-6659

For billing inquiries, please contact accounting at accounting@munsch.com or (214) 740 5198

# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

UNITED STATES COMMODITY	§	
FUTURES TRADING COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. A-12-CV-0862-LY
	§	
SENEN POUSA, INVESTMENT	§	
INTELLIGENCE CORPORATION,	§	
DBA PROPHETMAX MANAGED FX,	§	
JOEL FRIANT, MICHAEL DILLARD, and	§	
ELEVATION GROUP, INC.,	§	
	§	
Defendants.	§	

## ORDER GRANTING RECEIVER'S MOTION FOR APPROVAL OF ELEVENTH FEE APPLICATION

Before the Court is the Receiver's Motion for Approval of Eleventh Fee Application and Brief in Support ("Motion"), covering the time period July 28, 2019, through February 29, 2020. Having considered the Motion, the evidence presented, and arguments of counsel, if any, the Court finds the time spent, services performed, hourly rates charged, and expenses incurred by the Receiver and his retained professionals were reasonable and necessary for the Receiver to perform his Court-ordered duties. The Court concludes the Motion should be, and is hereby, GRANTED.

It is therefore ORDERED that payment for interim fees and expenses of \$191,179.73 to the Receiver for services rendered to the ProphetMax Receivership Estate and IB Capital Receivership Estate during the Eleventh Fee Period is approved.

SIGNED this day of	, 2020.
	LEE YEAKEL
	UNITED STATES DISTRICT JUDGE