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8 *Attorneys for Receiver Geoff Winkler*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 vs.

14 CAPSOURCE, INC., *et al.*

15 Defendants.
16

Case No. 2:20-CV-02303-RFB-DJA

**THIRD QUARTERLY
APPLICATION FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES OF RECEIVER AND
RECEIVER’S COUNSEL
GREENBERG TRAUIG FOR
PERIOD JANUARY 1, 2023
THROUGH MARCH 31, 2023**

17
18 COMES NOW, Geoff Winkler, the Court-appointed Receiver (the “Receiver”), by and
19 through counsel of record the law firm of Greenberg Traurig, LLP, and hereby submits this
20 Quarterly Application for Payment of Fees and Reimbursement of Expenses of Receiver and
21 Receiver’s counsel Greenberg Traurig, LLP (“Application”) for the period of January 1, 2023
22 through March 31, 2023.

23 This Application is based on the below Memorandum of Points and Authorities, the
24 declarations attached hereto, the pleadings and papers on file herein, and such other and further
25 information as may be presented to the Court at the time of any hearing.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION.

As the Court is aware, Geoff Winker of American Fiduciary Service (“AFS”) was appointed as Receiver in this matter on August 26, 2022 (ECF No. 17). (“Appointment Order”). Because the Receiver is not a licensed attorney, does not have in-house counsel, and due to the scope of service needed during the Application Period he employed professionals to assist him in fulfilling his duties as the Receiver. Greenberg Traurig serves as Court-approved counsel to the Receiver, and whose appointment was affirmed via the Court’s October 12, 2022 Order approving Receiver’s Motion to Employ Counsel. (ECF No. 20)

Pursuant to the terms of the Appointment Order, the Receiver is vested with authority and control over CapSource, Inc., (“CapSource”) along with the personal assets of individual defendants in the above-entitled action and authorized, subject to the approval of this Court, “to engage and employ persons in his discretion to assist him in carrying out his duties and responsibilities....”. (See Appointment Order at p. 2, ¶ F). This Application represents the third quarterly application for payment of fees and reimbursement of expenses of the Receiver and Greenberg Traurig in accordance with Paragraph 55 of the Appointment Order, and covers fees and expenses incurred between January 1, 2023 through March 31, 2023 (the “Application Period”).

By way of this Application, the Receiver and Greenberg Traurig request the Court’s approval of 100% of their fees and expenses incurred during the Application Period and further request the interim payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the receivership estate established in the above-entitled action (the “Receivership Estate” or “Estate”). Specifically, the amounts of the Applicants’ fees and expenses sought to be approved and paid under this Fee Application are as follows:

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Applicant	Total Fees	Interim Payment Requested (Fees)	Expenses	Interim Payment Requested (Expenses)
Receiver/AFS	\$110,026.50	\$94,421.20	\$13,762.59	\$13,762.59
Greenberg Traurig	\$29,774.96	\$23,819.97	\$1,428.56	\$1,428.56
TOTAL:	\$139,801.46	\$118,241.17	\$15,191.15	\$15,191.15

AFS's rates include a discount of its already discounted hourly rates for government matters and will not increase during the pendency of the case. Both the standard regulatory rate and the discounted regulatory rate reflect a significant discount off their standard consulting rates. Greenberg Traurig agreed to discount its standard billing rates for this matter by fifteen percent (15%) with discounts taken in the amounts identified above. All billing standards meet or exceed the SEC's Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S. Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses.

Consistent with the billing guidelines of the plaintiff Securities and Exchange Commission (the "SEC") AFS and Greenberg Traurig are seeking payment of 80% of their fees with the remaining, unpaid 20% "holdback" of approved fees being subject to final review and payment at the conclusion of this receivership. Notably, the Receiver and his counsel provided a draft and copies of billing entries to counsel for the Securities & Exchange Commission ("SEC") and the SEC staff has reviewed the same and indicated they do not oppose the interim approval and payment of the fees and costs sought herein.

II. SUMMARY OF WORK IN APPLICATION PERIOD

During the Application Period, and with assistance of counsel, the Receiver and the AFS team made progress on critical elements of Estate administration, including review and analysis of documents obtained from CapSource; investor communication and updating investor list; evaluation of estate assets and real estate transactions; analysis of tax implications; evaluate interim distribution options and preparation of motion to further same;

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1 evaluation of pending legal proceedings; preparation of quarterly reports; and communication
2 with SEC regarding pending matters.

3 The work completed by AFS and Greenberg Traurig was necessary under the terms of
4 the Receivership Order and provides value to the Estate, as such the fees and expenses incurred
5 during the Reporting Period are reasonable and appropriate and should be approved and paid,
6 on an interim basis, in the amounts indicated above. Again, as an accommodation to the Estate,
7 and consistent with the SEC's billing guidelines and the ordinary practice in federal
8 receiverships, AFS and Greenberg Traurig request that the Court approve 100% of the fees and
9 expenses incurred during the Application Period but authorize payment, on an interim basis,
10 of only 80% of such fees and 100% of such expenses, at this time.

11 **A. Receiver's Fees and Services**

12 Pursuant to the Appointment Order, the Receiver was empowered and tasked with a
13 broad range of authority, including the authority to assume and control the operation of the
14 Receivership Defendant, to determine the nature, location and value of all property interests of
15 the Receivership Defendant, to take possession of all Receivership Property and records, to
16 manage, control, operate and maintain the Receivership Estate, to use Receivership Property
17 for the benefit of the Receivership Estate, and to investigate and prosecute claims, and to
18 engage in litigation to preserve or recover assets or to carry out the Receiver's mandate.

19 Due to its broad range of experience and expertise, the Receiver, by and through AFS,
20 performs almost all required work in-house, saving both time and money, including tasks
21 involving corporate accounting, forensic accounting, case administration, claims
22 administration, asset valuation, investor communication and internet technology. AFS' billing
23 philosophy is to leverage work down to the staff member with the lowest billing rate that also
24 has the skills and experience necessary to complete the task. This allows AFS to minimize the
25 cost to complete all work associated with the case, ensuring a maximum return to stakeholders
26 involved in the matter while also preserving the quality of their work product. AFS does not
27 bill for travel time in regulatory cases.

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The Receiver's fees for the Application Period are as follows:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Geoff Winkler	Receiver	44.1	\$395.00	\$17,419.50
John Hall	Accountant	24.9	\$350.00	\$8,715.00
Milana Barkhanoy	Dir. of Case Management	6.5	\$300.00	\$1,950.00
Josh McGraw	Case Manager	145.3	\$320.00	\$46,496.00
Amanda Deering	Case Manager	27.4	\$280.00	\$7,672.00
Maggie Chavez	Associate	9.9	\$260.00	\$2,574.00
Anna Priebe	Associate	97.6	\$255.00	\$24,888.00
Phil Chen	Associate Business Consultant	1.2	\$260.00	\$312.00
Total		356.9		\$110,026.50

AFS's rates include a discount off its already discounted hourly rates for government matters and will not increase for the pendency of the case. Both the standard regulatory rate and the discounted regulatory rate reflect a significant discount of their standard consulting rates. All billing standards meet or exceed the SEC's Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S. Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses.

The Receiver's expenses for the Application Period are as follows:

<i>Category</i>	<i>Total Cost</i>
Airfare	\$1,808.52
Car Rental	\$649.33
Document and Asset Storage	\$958.86
Hotel	\$4,437.84
Meals	\$1,242.00
Internet/Online Fees	\$17.97

<i>Category</i>	<i>Total Cost</i>
Courier/Shipping/Freight	\$4,648.07
<i>Total</i>	\$13,762.59

AFS does not seek reimbursement for routine copying, facsimile, postage, or other expenses. Any expenses which AFS seeks to have reimbursed are done so in accordance with the SEC and U.S. Trustee guidelines above. Costs directly attributable to the administration of the estate will be paid directly by the estate in accordance with the order of appointment.

The Standardized Fund Accounting Report, AFS's invoices, and its billing entries are included with the Declaration of Geoff Winkler attached as **Exhibit 1**.

B. Greenberg Traurig's Fees and Services

Greenberg Traurig was retained by the Receiver in August 2022. The Receiver selected Greenberg Traurig to serve as general receivership counsel due to the firm's litigation experience, receivership experience, familiarity with local rules and procedures and strong Nevada base. As Nevada counsel, Greenberg Traurig has taken the lead on communications with counsel and third parties, identifying and evaluating ancillary proceedings, assisting in the review of documents relating to real estate transactions, evaluate interim distribution options and preparation of motion to further same; preparation of quarterly reports and court filings; communication with SEC regarding pending matters; and review and analysis of issues as requested by the Receiver.

In all, on account of its services rendered to the Receiver during the Application Period, Greenberg Traurig has billed 79.6 hours, and incurred **\$29,774.96** in fees and **\$1,428.56** in expenses, across the following categories:

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<i>Category</i>	<i>Hours</i>	<i>Fees</i>	<i>Expenses</i>
Asset Analysis and Recovery	66.4	\$24,235.09	\$1,428.56
Case Administration	10.8	\$4,611.68	\$0.00
Claims Administration and Objections	0.8	\$384.19	\$0.00
Status Reports	1.4	\$476.00	\$0.00
Tax Issues	0.2	\$68.00	\$0.00
Total	79.6	\$29,774.96	\$1,428.56

Provided below are narrative summaries of the work performed under each of the categories. Additionally, Greenberg Traurig’s invoices are included with the Declaration of Kara Hendricks attached as **Exhibit 2**. Greenberg Traurig consistently endeavored to staff each task efficiently, using a core team of attorneys, with specialized assistance as necessary.

Greenberg Traurig’s fees for the Application Period for the category of “Asset Analysis and Recovery” are as follows:

NAME	TITLE	HOURS	RATE/HR.	TOTAL
Kara B. Hendricks	Shareholder	19.8	\$480.20	\$9,508.96
Kyle Ewing	Associate	31.2	\$340.00	\$10,608.00
Christian Spaulding	Associate	9.9	\$318.77	\$3155.63
Cynthia Ney	Paralegal	5.5	\$175.00	\$962.50
Total		66.4		\$24,235.09

Work performed in this category related primarily to the identification and assessment of state court and ancillary proceedings, preparation of indemnification agreement, investor meeting, court status hearing, preparation of motion for instruction regarding sale of real property, communications with counsel in state court actions involving CapSource and analysis of documentation received from third parties.

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1 Greenberg Traurig also handled and assisted the Receiver with case administration
 2 activities including analysis of Receiver's employment of needed professionals, preparation of
 3 quarterly status report, research on litigation involving CapSource and investor meetings.

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Kara B. Hendricks	Shareholder	6.7	\$480.20	\$3,217.68
Kyle Ewing	Associate	4.1	\$340.00	\$1,394.00
Total		10.8		\$4,611.68

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9 Greenberg Traurig's fees for the Application Period for the category of "Claim
 10 Administration and Objections" are as follows:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Kara B. Hendricks	Shareholder	0.8	\$480.20	\$384.19
Total		0.8		\$384.19

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15 Work performed in this category related primarily to evaluation of pending litigation
 16 matters and real property at issue.

17 Greenberg Traurig's fees for the Application Period for the category of "Status
 18 Reports" are as follows:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Kyle Ewing	Associate	1.4	\$340.00	\$476.00
Total		1.4		\$476.00

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23 Work performed in this category related to the fulfilling the Receiver's obligation to
 24 prepare a quarterly report and the exhibits related thereto.

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Greenberg Traurig's fees for the Application Period for the category of "Tax Issues:"

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Kyle Ewing	Associate	0.2	\$340.00	\$68.00
Total		0.2		\$68.00

Work performed in this category related to proceedings concerning the sale of properties and distributions in connection with the same.

As referenced above, Greenberg Traurig endeavored to staff each task efficiently, using a core team of attorneys and utilizing associates and paralegal assistance where appropriate. Additionally, Greenberg Traurig agreed to discount its standard billing rates for this matter by fifteen percent (15%) with the discounted rates identified above.

C. The Requested Fees and Services are Reasonable and Should be Approved.

The Receiver and Greenberg Traurig respectfully submit that the fees and expenses incurred during the Application Period were fair, reasonable, necessary, and significantly benefited the Estate. Specifically, and as reflected in **Exhibit 1** and **Exhibit 2**. After taking possession of CapSource files it was necessary for the Receiver to inventory the same and thereafter evaluate and analyze the records provided. Additionally, efforts were made to review investor lists and communicate with investors, review accounting records, evaluate asset and properties of the estate, assess income and investor payment options, evaluate lease provisions, analyze ancillary proceedings, process account information, begin evaluating estate needs including tax issues, prepare financial and quarterly reports, communication with SEC regarding pending matters, and preparation of stipulations and court filings.

In accomplishing these tasks, AFS and Greenberg Traurig have endeavored to staff this matter appropriately, billing their time at substantially discounted rates, and steadfastly attempted to avoid duplication of efforts. Moreover, as detailed below, the requested fees are justified based on the complexity of tasks completed and quality of work performed and value provided to the Receivership Estate.

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1 **i. Complexity of Receivers Tasks and Quality of Work Performed.**

2 During the early stages of a receivership there are a number of moving parts and
3 numerous issues to address many on an expedited timeline. Here, the Receiver made
4 immediate efforts to contact defendants to facilitate the turnover of documents and was able to
5 facilitate the same in an orderly fashion. After retrieving the records, the documents were
6 inventoried and a review process initiated. Efforts were also made to contact and
7 communicated with investors. Additionally, due to CapSource’s unique structure, efforts were
8 taken to understand the same to evaluate a mechanism to address investor concerns. The
9 Receiver and his team also began the evaluation of financial concerns and tax issues and had
10 ongoing communication with the SEC. This case is also unique in that, the Receiver learned
11 of several pending litigation matters to which CapSource was a party that required attention.
12 All of these efforts were taken contemporaneously and required coordination between the
13 Receiver and counsel.

14 **ii. Fair Value of Receiver’s Time and Reasonableness of Expenses on**
15 **Receivership Estate.**

16 As set forth in the applications made to this court to facilitate the Receiver employing
17 counsel (ECF No. 18), and as referenced above, the attorneys working on this matter are doing
18 so at discounted rates, notwithstanding the complexity of the present receivership case or the
19 amounts in controversy. In addition, the Receiver and his professionals have consistently
20 endeavored to avoid duplication of efforts and to undertake required tasks in an efficient
21 manner. The Receiver and his internal team have also committed to significantly discounted
22 rates notwithstanding AFS’s broad range of experience and expertise. Moreover, AFS
23 performs a substantial amount of work in-house, saving both time and money, including tasks
24 involving corporate accounting, forensic accounting, case administration, claims
25 administration, asset valuation, investor communications and internet technology. The
26 significantly reduced rates being charged in this matter, along with efforts to avoid duplication
27 and streamline tasks demonstrate the reasonableness of the fees requested.

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1 When it comes to evaluating the burden of the expenses and the ability of the
2 Receivership Estate to reasonably bear the same, it is important to look at the case as a whole.
3 Here, the Receiver is looking to wind-down the business operations of CapSource and provide
4 finality for all involved and the Receiver and his team are able to ensure that occurs.

5 **iii. Communication with SEC Counsel**

6 The fees requested by the Receiver and his professionals were reviewed and will
7 continue to be reviewed by the SEC staff prior to their submittal to this Court. The Receiver
8 provided invoices to counsel for the SEC in advance of this filing. The SEC staff then reviews
9 the invoices and can provide comments to the Receiver prior to the filing of the fee application.
10 The Receiver and his professionals are sensitive to the feedback received from the SEC staff.
11 **For purposes of the current application, SEC counsel has informed the Receiver that the**
12 **SEC does not oppose the requested allowance and payment of fees and costs, on an**
13 **interim basis.**

14 It is respectfully requested that that the Court approve 100% of their fees and expenses,
15 and also authorize the payment of those fees and expenses on a percentage, interim basis, as
16 requested herein.

17 **D. Approval Needed for Legal Fees Incurred at Request of CRO.**

18 As the Court is aware, prior to the Mr. Winkler being appointed as the Receiver in this
19 matter, he was appointed by the Court to serve as the Chief Restructuring Officer (“CRO”) for
20 CapSource. While Mr. Winkler was serving as CRO, he requested the assistance of the law
21 firm of Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”) to review legal
22 documents and assist with evaluating the need for a potential conversion of this case to a
23 receivership and related issues. As a result of the same, legal fees totaling \$8,981.45 were
24 incurred. Because such fees relate directly to CapSource and receivership issues, the Receiver
25 hereby requests Court authorization to pay the same from receivership assets. A copy of the
26 invoice is attached hereto with the Winkler Declaration as Exhibit B.

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1 **III. CONCLUSION**

2 For the foregoing reasons, the Receiver and Greenberg Traurig respectfully requests
3 that the Court enter an order¹:

4 1. Granting this Application in its entirety;

5 2. Approving the Receivers' fees and expenses incurred during the Application
6 Period, in the respective amounts of \$110,026.50 and \$13,762.59;

7 3. Authorizing the Receiver to pay AFS on an interim basis, 80% of its approved
8 fees incurred during the Application Period, in the amount of \$94,421.20, and 100% of its
9 approved expenses incurred during the Application Period, in the amount of \$13,762.59, from
10 the funds of the Receivership Estate;

11 4. Approving Greenberg Traurig's fees and expenses incurred during the
12 Application Period, in the respective amounts of \$29,774.96 and \$1,428.56;

13 5. Authorizing the Receiver to pay Greenberg Traurig on an interim basis, 80% of
14 its approved fees incurred during the Application Period, in the amount of \$23,819.97; and
15 100% of its approved expenses incurred during the Application Period, in the amount of
16 \$1,428.56, from the funds of the Receivership Estate;

17 6. Authorizing the Receiver to pay Allen Matkins a total of \$8,981.45.

18 7. Providing such other and further relief as the Court deems just and proper under
19 the circumstances.

20 DATED this 12th day of May 2023.

21 **GREENBERG TRAUIG, LLP**

22 By: */s/ Kara B. Hendricks*

23 KARA B. HENDRICKS

24 Nevada Bar No. 07743

25 KYLE A. EWING

26 Nevada Bar No. 14051

27 CHRISTIAN T. SPAULDING

28 Nevada Bar No. 14277

Attorneys for Receiver Geoff Winkler

1 The proposed order is attached as **Exhibit 3**.

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CERTIFICATE OF SERVICE

I hereby certify that, on the 12th day of May, 2023, a true and correct copy of the foregoing **THIRD QUARTERLY APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND RECEIVER’S COUNSEL GREENBERG TRAUIG FOR PERIOD JANUARY 1, 2023 THROUGH MARCH 31, 2023** was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties by operation of the Court’s CM/ECF system, and parties may access this filing through the Court’s CM/ECF system.

/s/ Evelyn Escobar-Gaddi
An employee of GREENBERG TRAUIG, LLP

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INDEX OF EXHIBITS	
EXHIBIT	DESCRIPTION
Exhibit 1	Declaration of Geoff Winkler and Supporting Documents
	A AFS Invoice for Services Standardized Fund Accounting Report (January 2021 through March 2023)
	B Allen Matkins Leck Gamble Mallory & Natsis LLP Invoices
Exhibit 2	Declaration of Kara Hendricks and Supporting Documents
	A GT Invoices for Services (January 2023 through March 2023)
Exhibit 3	[Proposed] Order Granting Second Quarterly Application for Payment of Fees and Reimbursement of Expenses of Receiver and Receiver’s Counsel Greenberg Traurig

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8 *Attorneys for Receiver Geoff Winkler*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

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14 CAPSOURCE, INC., *et al.*

15 Defendants.
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Case No. 2:20-CV-02303-RFB-DJA

**DECLARATION OF GEOFF
WINKLER IN SUPPORT OF THIRD
QUARTERLY APPLICATION FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES OF
RECEIVER AND RECEIVER'S
COUNSEL GREENBERG TRAURIG
FOR PERIOD JANUARY 1, 2023-
MARCH 31, 2023**

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19 I, Geoff Winkler, hereby declare as follows:

20 1. I am over 21 years old and am a founding member and the chief executive
21 officer of American Fiduciary Services LLC (“AFS”), which is based in Portland, Oregon.

22 2. I am competent to testify to the matters presented in this declaration, and I
23 submit this declaration in support of my application for approval of the fees and costs of my
24 firm and my professional in connection with CapSource, Inc. (“CapSource”). This declaration
25 is based on my personal knowledge, except where made on information and belief, and as to
26 those matters, I believe them to be true.

27 3. On August 26, 2022, the Court appointed me as the permanent receiver of
28 CapSource (ECF No. 17).

1 4. Because I am not a licensed attorney in Nevada and AFS does not have in-
2 house counsel, and due to the scope of service needed during the Application Period, I sought
3 approval to employ the law firm of Greenberg Traurig, LLP (“Greenberg Traurig”) to assist
4 me in fulfilling my duties as the Receiver (ECF No. 20).

5 5. Attached to this declaration as **Exhibit A** is a true and correct copy of the
6 invoice for the services of my firm for the period from January 1, 2023, through March 31,
7 2023 (the “Application Period”).

8 6. In the ordinary course of AFS’s business, we keep a record of all time
9 expended by our professionals in the rendering of professional services on a computerized
10 billing system.

11 7. At or near the time the professional services are rendered, professionals of the
12 firm record (a) the description of the nature of the services performed, (b) the duration of the
13 time expended, and (c) the client/matter name or number by either: (1) writing such
14 information on a time sheet, or (2) inputting such information directly into the firm's computer
15 billing system.

16 8. For the professionals who record their time using written time sheets, the
17 information contained in the time sheets is transcribed into the firm’s computer billing system.

18 9. The firm’s computer billing system keeps a record of all time spent on a
19 client/matter, the professional providing the services, and a description of the services
20 rendered. The firm’s computer billing system automatically multiplies the time expended by
21 each professional by the respective professional's billing rate to calculate the amount of the
22 fee. The firm conducts its business in reliance on the accuracy of such business records

23 10. Pursuant to the Receivership Order, my team and I performed the following
24 duties during the Application Period: review and analysis of documents obtained from
25 CapSource; investor communication and updating investor list; evaluation of estate assets and
26 real estate transactions; analysis of tax implications; evaluate interim distribution options;
27 evaluation of pending legal proceedings; preparation of quarterly reports; and communication
28 with SEC regarding pending matters.

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1 11. Due to its broad range of experience and expertise, the Receiver by and through
2 AFS performs almost all required work in-house, saving both time and money, including tasks
3 involving corporate accounting, forensic accounting, case administration, claims
4 administration, asset valuation, investor communication and internet technology.

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6 lowest bill rate that also has the skills and experience necessary to complete the task. This
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9 their work product. AFS does not bill for travel time in regulatory cases.

10 13. AFS's rates include a discount off its already discounted hourly rates for
11 government matters and will not increase for the pendency of the case. Both the standard
12 regulatory rate and the discounted regulatory rate reflect a significant discount off their
13 standard consulting rates.

14 14. All billing standards meet or exceed the SEC's Billing Instructions for
15 Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission
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18 15. AFS does not seek reimbursement for routine copying, facsimile, postage, or
19 other expenses. Any expenses which AFS seeks to have reimbursed are done so in accordance
20 with the SEC and U.S. Trustee guidelines above. Costs directly attributable to the
21 administration of the estate will be paid directly by the estate in accordance with the order of
22 appointment.

23 16. The Standardized Fund Accounting Report, AFS's invoices, and its billing
24 entries are attached hereto as **Exhibit A**.

25 17. I hereby certify that I have read the Third Quarterly Application for Payment
26 of Fees and Reimbursement of Expenses of Receiver and Receiver's Counsel Greenberg
27 Traurig for the Period from January 1, 2023 through March 31, 2023.

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1 18. I respectfully submit that the fees and expenses incurred during the Application
2 Period were fair, reasonable, necessary, and significantly benefited the Estate and request the
3 Court approve the fees and costs reflected in the invoices and approve payment in the amounts
4 reflected in the Application.

5 19. Additionally, I request the ability to pay the fees and costs for the retained
6 professional, Greenberg Traurig, as set forth in the Motion.

7 20. To the best of my knowledge, information and belief formed after reasonable
8 inquiry, the Application and all fees and expenses therein are true and accurate and comply
9 with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities
10 and Exchange Commission.

11 21. All fees contained in the Application are based on the rates listed in AFS's fee
12 schedule, subject to increases disclosed to the SEC and approved by the Court prior to any
13 such increase. All fees contained in the Application are reasonable, necessary and
14 commensurate with the skill and experience required for the activity performed and are
15 subject to Court approval.

16 22. AFS has not included in the amount for which reimbursement is sought the
17 amortization of the cost of any investment, equipment, or capital outlay (except to the extent
18 that any such amortization is included within the permitted allowable amounts set forth herein
19 for photocopies and facsimile transmission).

20 23. In seeking reimbursement for a service which AFS justifiably purchased or
21 contracted for from a third party (such as copying, imaging, bulk mail, messenger service,
22 overnight courier, computerized research, or title and lien searches), AFS requests
23 reimbursement only for the amount billed to AFS by the third-party vendor and paid by AFS
24 to such vendor. If such services are performed by the Receiver or the Receiver's retained
25 personnel, the Receiver or the retained personnel, as appropriate, will certify that it is not
26 making a profit on such reimbursable service.

27 24. In addition to the foregoing, attached hereto as **Exhibit B**, is a true and correct
28 copy of invoices I received from the law firm of Allen Matkins Leck Gamble Mallory &

1 Natsis LLP (“Allen Matkins”) who provide legal service at my request while I served as the
2 Chief Restructuring Officer (“CRO”) for CapSource. Allen Matkins assisted me by reviewing
3 legal documents and assisted with evaluating the need for a potential conversion of this case
4 to a receivership and related issues. As a result of the same, legal fees totaling \$8,981.45 were
5 incurred. Because such fees relate directly to CapSource and receivership issues, I hereby
6 request Court authorization to pay the same from receivership assets.

7 25. I certify that I have not entered into any agreement, written or oral, express or
8 implied, with any other person concerning the amount of compensation paid or to be paid
9 from the assets of the estate, or any sharing of it.

10 I declare under penalty of perjury under the laws of the State of Nevada that the
11 foregoing is true and correct.

12 Executed on May 12, 2023.

13 */s/ Geoff Winkler*

14 GEOFF WINKLER

15 Declarant
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EXHIBIT A

EXHIBIT A

Standardized Fund Accounting Report

STANDARDIZED FUND ACCOUNTING REPORT for SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean

Receivership; Civil Docket No. 2:20-cv-02303-RFB-DJA

Reporting Period from 01/01/2023 to 03/31/2023

FUND ACCOUNTING (See instructions)				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 01/01/2023):	1,352,472.12		
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	182,999.96		
Line 3	Cash and Securities (in transit)	-		
Line 4	Interest/Dividend Income	-		
Line 5	Business Asset Liquidation	-		
Line 6	Personal Asset Liquidation	-		
Line 7	Third-Party Litigation Income	-		
Line 8	Miscellaneous - Other	-		
	Total Funds Available (Lines 1 - 8):		182,999.96	1,535,472.08
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	(208,308.89)		
Line 10b	Business Asset Expenses	-		
Line 10c	Personal Asset Expenses	-		
Line 10d	Investment Expenses	-		
Line 10e	Third-Party Litigation Expenses	-		
	1. Attorney Fees	-		
	2. Litigation Expenses	-		
	<i>Total Disbursements for Receivership Operations</i>		(208,308.89)	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments		-	
	Total Disbursements for Receivership Operations			(208,308.89)
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator.....	-		
	Independent Distribution Consultant (IDC).....	-		
	Distribution Agent.....	-		
	Consultants.....	-		
	Legal Advisers.....	-		
	Tax Advisers.....	-		
	2. Administrative Expenses	-		
	3. Miscellaneous	-		
	<i>Total Plan Development Expenses</i>		-	
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator.....	-		
	IDC.....	-		
	Distribution Agent.....	-		
	Consultants.....	-		
	Legal Advisers.....	-		
	Tax Advisers.....	-		
	2. Administrative Expenses	-		
	3. Investor Identification:			
	Notice/Publishing Approved Plan.....	-		
	Claimant Identification.....	-		
	Claims Processing.....	-		
	Web Site Maintenance/Call Center.....	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	-		
	<i>Total Plan Implementation Expenses</i>		-	
	Total Disbursements for Distribution Expenses Paid by the Fund			-
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	-		
Line 12b	Federal Tax Payments	-		
	Total Disbursements to Court/Other:		-	
	Total Funds Disbursed (Lines 9 - 11):			(208,308.89)
Line 13	Ending Balance (As of 03/31/2023):			1,327,163.19
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		1,327,163.19	
Line 14b	Investments		-	
Line 14c	Other Assets or Uncleared Funds		15,693,611.28	
	Total Ending Balance of Fund - Net Assets			17,020,774.47

STANDARDIZED FUND ACCOUNTING REPORT for SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Receivership; Civil Docket No. 2:20-cv-02303-RFB-DJA
 Reporting Period from 01/01/2023 to 03/31/2023

OTHER SUPPLEMENTAL INFORMATION:		Detail	Subtotal	Grand Total
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
<i>Line 15a</i>	<i>Plan Development Expenses Not Paid by the Fund</i>			
	1. Fees:			
	Fund Administrator	-		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Miscellaneous	-		
	Total Plan Development Expenses Not Paid by the Fund	-		
<i>Line 15b</i>	<i>Plan Implementation Expenses Not Paid by the Fund:</i>			
	1. Fees:			
	Fund Administrator	-		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Investor Identification:			
	Notice/Publishing Approved Plan	-		
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. FAIR Reporting Expenses	-		
	Total Plan Implementation Expenses Not Paid by the Fund	-		
<i>Line 15c</i>	<i>Tax Administrator Fees & Bonds Not Paid by the Fund</i>			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	Disbursements to Court/Other Not Paid by the Fund			
<i>Line 16a</i>	<i>Investment Expenses/CRIS Fees</i>		-	
<i>Line 16b</i>	<i>Federal Tax Payments</i>		-	
	Total Disbursements to Court/Other Not Paid by the Fund:			-
Line 17	DC & State Tax Payments			-
Line 18	No. of Claims:			
<i>Line 18a</i>	<i># of Claims Received This Reporting Period</i>	-		
<i>Line 18b</i>	<i># of Claims Received Since Inception of Fund</i>	-		
Line 19	No. of Claimants/Investors:			
<i>Line 19a</i>	<i># of Claimants/Investors Paid This Reporting Period</i>	-		
<i>Line 19b</i>	<i># of Claimants/Investors Paid Since Inception of Fund</i>	-		

Receiver: **Geoff Winkler**

By: 

Geoff Winkler
 (printed name)

Chief Executive Officer
American Fiduciary Services LLC
Receiver, CapSource, Inc.

Date: April 28, 2023

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Email to JBH re: document review.	1/3/2023	0.2	320.00	64.00	Financial - Data Analysis
Josh McGraw	Discussing status report with AMD.	1/3/2023	0.1	320.00	32.00	Financial - Status Reports
Josh McGraw	Calls with investors re: interim distributions and receivership process.	1/3/2023	0.7	320.00	224.00	Legal - Case Administration
Josh McGraw	Discussing document review with AMD.	1/3/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Discussing document review with AMP.	1/3/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Discussing document review with JPM.	1/3/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Discussing documents review with AMD.	1/3/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Discussing investor communication with JPM.	1/3/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Discussing status report with JPM.	1/3/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Email JBH re: status of CapSource document analysis.	1/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Email JPM re: timeline for CapSource document analysis.	1/3/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: Entity renewals.	1/3/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Email to KH re: status report litigation updates.	1/3/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Emails to investor re: receivership resources and investment updates.	1/3/2023	0.3	320.00	96.00	Legal - Case Administration
John Hall	Review entity renewal documents forwarded from SL, discuss with GBW.	1/3/2023	0.7	350.00	245.00	Legal - Case Administration
Geoff Winkler	Review list of entities, renewal dates, discuss with JPM.	1/3/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Review Nevada Secretary of State website for entity renewals.	1/3/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Review potential settlement, documents from storage, compare to ledgers.	1/3/2023	0.6	395.00	237.00	Legal - Case Administration
Josh McGraw	Updating investor list with registered parties and email or call requests.	1/3/2023	0.6	320.00	192.00	Legal - Case Administration
	Reviewing 5th Avenue ownership entity and property to understand validity of claim received.	1/4/2023	0.5	320.00	160.00	Financial - Data Analysis
Josh McGraw	Communication with GBW re: insurance for properties.	1/4/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with JPM re: insurance for properties.	1/4/2023	0.1	395.00	39.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with KH re: slip and fall claim.	1/4/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Discuss image storage and access with counsel KE.	1/4/2023	0.2	395.00	79.00	Legal - Case Administration
John Hall	Discussing case updates for status report with AMD.	1/4/2023	0.1	350.00	35.00	Legal - Case Administration
Amanda Deering	Discussing case updates for status report with JBH.	1/4/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Email to KH re: attorney claim against affiliated entity.	1/4/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Meeting with AMP re: physical documentation review.	1/4/2023	0.4	320.00	128.00	Legal - Case Administration
John Hall	Review and discuss server imaging issues and logistics with KAE and GBW.	1/4/2023	0.4	350.00	140.00	Legal - Case Administration
Josh McGraw	Review of email from JA re: letter received for claim against affiliated entity.	1/4/2023	0.1	320.00	32.00	Legal - Case Administration
John Hall	Review slip and fall claim, discuss with GBW. Review associated SOS info from KH.	1/4/2023	0.7	350.00	245.00	Legal - Case Administration
Anna Priebe	Reviewing project details for capsources digitization with JPM.	1/4/2023	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Call with GBW re: insurance for properties.	1/5/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: insurance for properties.	1/5/2023	0.1	395.00	39.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with counsel KH re: restitution and stipulation.	1/5/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Call with investor re: update on their investment.	1/5/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to AMD re: claimants in multiple cases.	1/5/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Email to JPM re: investor communication.	1/5/2023	0.1	280.00	28.00	Legal - Case Administration
Geoff Winkler	Emails with TM re: distribution, pull documents, review and email to TM.	1/5/2023	0.3	395.00	118.50	Legal - Case Administration
Geoff Winkler	Review invoices for prior legal services, discuss with counsel.	1/5/2023	0.3	395.00	118.50	Legal - Case Administration
Geoff Winkler	Work with counsel re: drive imaging, delivery of copy.	1/5/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Email to JBH re: entity search results and named managing members.	1/6/2023	0.1	320.00	32.00	Financial - Data Analysis
	Review letter re: ARC balances, review email from EM, compare to existing calculations, prepare for discussion.	1/6/2023	0.5	395.00	197.50	Legal - Asset Analysis and Recovery
Anna Priebe	Call with FedEx re: transportation of physical documentation.	1/6/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Call with Regus re: assistance with the transportation of physical documents.	1/6/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Communication with GBW re: FedEx account information for physical documents.	1/6/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to investor re: resources for claimant and update on investment.	1/6/2023	0.1	320.00	32.00	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Amanda Deering	Finding and sending contact information to AMP for document transfer.	1/6/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Message with JBH re: FedEx for CapSource boxes.	1/6/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Call with FedEx and LV office re: document shipping.	1/9/2023	0.2	255.00	51.00	Financial - Data Analysis
Geoff Winkler	Call with investor re: current status.	1/9/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Call with investor re: JC Commercial investment, timeline for distribution and receivership resources.	1/9/2023	0.3	320.00	96.00	Legal - Case Administration
Josh McGraw	Email to investor re: receivership website and update on their investment.	1/9/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Email to KH re: status report.	1/9/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Meet with JPM, JBH, GBW, AMD, MCC, MBB re: indexing for documentation.	1/9/2023	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and confirmation of requested documents with AMD, GBW, JBH, MCC, AMP and JPM.	1/9/2023	0.1	300.00	30.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and confirmation of requested documents with AMD, GBW, JBH, MCC, AMP and MBB.	1/9/2023	0.1	320.00	32.00	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and confirmation of requested documents with AMD, GBW, JPM, MCC, AMP and MBB.	1/9/2023	0.1	350.00	35.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication, status report and confirmation of requested documents with JPM, AMD, JBH, MCC, AMP and MBB.	1/9/2023	0.1	395.00	39.50	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication, status report and confirmation of requested documents with JPM, GBW, JBH, MBB, AMP.	1/9/2023	0.1	260.00	26.00	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication, status report and confirmation of requested documents with JPM, GBW, JBH, MCC, AMP and MBB.	1/9/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Reviewing pleadings and litigation summary and editing status report.	1/9/2023	0.4	280.00	112.00	Legal - Case Administration
Anna Priebe	Email Regus re: document transfer.	1/10/2023	0.1	255.00	25.50	Financial - Data Analysis
Josh McGraw	Email to GBW re: file backup.	1/10/2023	0.1	320.00	32.00	Financial - Data Analysis
Anna Priebe	Multiple emails with Regus re: document transfer.	1/10/2023	0.3	255.00	76.50	Financial - Data Analysis
Geoff Winkler	Discuss server image, delivery of items.	1/10/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Email to investor re: request for update on their investments.	1/10/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to JA re: backup equipment.	1/10/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Updating investor list with missing information.	1/10/2023	0.4	320.00	128.00	Legal - Case Administration
Anna Priebe	Discussion with JPM and AMD re: digitization.	1/11/2023	0.4	255.00	102.00	Financial - Data Analysis
Anna Priebe	Receipt of documents for digital indexing, indexing boxes 194 and 197.	1/11/2023	1.3	255.00	331.50	Financial - Data Analysis
Josh McGraw	Call with investor re: questions about ARC-RE and the receivership.	1/11/2023	0.5	320.00	160.00	Legal - Case Administration
Geoff Winkler	Call with tenant to discuss case, activity moving forward, plan, potential sale.	1/11/2023	0.7	395.00	276.50	Legal - Case Administration
Josh McGraw	Communication with AMD and AMP to update investor communication.	1/11/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Discussing box index with AMP and JPM to support with document review.	1/11/2023	0.4	280.00	112.00	Legal - Case Administration
Milana Barkhanoy	Discussing case tax strategy with JBH, SC and EC from BT.	1/11/2023	0.3	300.00	90.00	Legal - Case Administration
John Hall	Discussing case tax strategy with MBB, SC and EC from BT.	1/11/2023	0.3	350.00	105.00	Legal - Case Administration
Josh McGraw	Discussing physical file review with AMP and AMD.	1/11/2023	0.4	320.00	128.00	Legal - Case Administration
Milana Barkhanoy	Email from KH re motion.	1/11/2023	0.1	300.00	30.00	Legal - Case Administration
Josh McGraw	Email to investor re: summary of receivership, documentation, updates on three of their investments and receivership website resources.	1/11/2023	0.3	320.00	96.00	Legal - Case Administration
Milana Barkhanoy	Email to SC and EC.	1/11/2023	0.1	300.00	30.00	Legal - Case Administration
Geoff Winkler	Review and research payment issue, additional investment, memo regarding findings and missing documentation.	1/11/2023	1.1	395.00	434.50	Legal - Case Administration
Anna Priebe	Updating investor communication with AMD as requested by JPM.	1/11/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Updating investor communication with AMP as requested by JPM.	1/11/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Collection of physical documents via FedEx.	1/12/2023	0.2	255.00	51.00	Financial - Data Analysis
Josh McGraw	Communication with AMP re: CapSource claimant identification.	1/12/2023	0.1	320.00	32.00	Financial - Data Analysis
John Hall	Discussion with AMP re: document assessment for digitization and claimant identification.	1/12/2023	0.7	350.00	245.00	Financial - Data Analysis

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Anna Priebe	Discussion with JBH re: document assessment for digitization and claimant identification.	1/12/2023	0.7	255.00	178.50	Financial - Data Analysis
Josh McGraw	Meeting with AMP re: outstanding loans.	1/12/2023	0.3	320.00	96.00	Financial - Data Analysis
Anna Priebe	Meeting with JPM re: capsources outstanding loans.	1/12/2023	0.3	255.00	76.50	Financial - Data Analysis
Anna Priebe	Message to JPM re: CapSource claimant identification.	1/12/2023	0.1	255.00	25.50	Financial - Data Analysis
Anna Priebe	Moving of CapSource documents.	1/12/2023	0.3	255.00	76.50	Financial - Data Analysis
Amanda Deering	Pulling reports from KCC, reviewing ledger and preparing exhibits for status report.	1/12/2023	0.8	280.00	224.00	Financial - Status Reports
Josh McGraw	Call with investor re: questions about their investment.	1/12/2023	0.1	320.00	32.00	Legal - Case Administration
Milana Barkhanoy	Email from SC re next steps in retaining BK as tax support for the case.	1/12/2023	0.1	300.00	30.00	Legal - Case Administration
Josh McGraw	Email to AMP re: list of the remaining notes receivable and status for each asset.	1/12/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Emails with TM re: time to discuss revisions to settlement.	1/12/2023	0.1	395.00	39.50	Legal - Case Administration
Geoff Winkler	Review ARC, Texas 156, other deals, plan strategy for next steps.	1/12/2023	1.4	395.00	553.00	Legal - Case Administration
Josh McGraw	Discussion with AMP re: search for claims deals.	1/13/2023	0.3	320.00	96.00	Financial - Data Analysis
Anna Priebe	Discussion with JPM re: search for claims deals.	1/13/2023	0.3	255.00	76.50	Financial - Data Analysis
Amanda Deering	Call with investor re: repayment status.	1/13/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Call with investor requesting an update on their investment and the receivership.	1/13/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Call with investor.	1/13/2023	0.2	395.00	79.00	Legal - Case Administration
Geoff Winkler	Call with TM and counsel KH to discuss ARC, state court cases.	1/13/2023	0.6	395.00	237.00	Legal - Case Administration
Geoff Winkler	Follow up with TM re: SFAR, information for accounting.	1/13/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Call to investor re: questions about their investment.	1/17/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Communication with AMD re: investor call.	1/17/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Communication with JPM re: investor call.	1/17/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Call with Extra Space Storage, spoke with Dakota re: CapSource boxes.	1/18/2023	0.1	255.00	25.50	Financial - Data Analysis
Anna Priebe	Preparing documents for pick up.	1/18/2023	0.2	255.00	51.00	Financial - Data Analysis
Amanda Deering	Call with investors to discuss 5th Avenue and contact information.	1/18/2023	0.4	280.00	112.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with investor re: 5th avenue investment and receivership process.	1/18/2023	0.5	320.00	160.00	Legal - Case Administration
Josh McGraw	Call with investor re: ARC RE and 5th Avenue investments.	1/18/2023	0.5	320.00	160.00	Legal - Case Administration
Josh McGraw	Emails to investors re: receivership, their investments and timeline till disposition.	1/18/2023	0.3	320.00	96.00	Legal - Case Administration
	Reviewing documents provided by investor re: FM 307, communication with defendants and investment documentation.	1/18/2023	0.9	320.00	288.00	Legal - Case Administration
Josh McGraw	Preparing documents for shipping 137 boxes, including adding shipping labels.	1/19/2023	2.5	255.00	637.50	Financial - Data Analysis
Josh McGraw	Researching requirements for reporting fair market value.	1/19/2023	0.3	320.00	96.00	Financial - Data Analysis
Josh McGraw	Call with investor re: questions about ARC-RE, the receivership and the distribution timeline.	1/19/2023	0.5	320.00	160.00	Legal - Case Administration
Josh McGraw	Discussing investor communication with AMD.	1/19/2023	0.2	320.00	64.00	Legal - Case Administration
Amanda Deering	Discussing investor communication with JPM.	1/19/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Email to AMP re: claimant question about investment outside of receivership.	1/19/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to investor re: the second status report.	1/19/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Investor website update.	1/19/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Emails with CE re: loan documents for Meadows 78 and King 261.	1/20/2023	0.2	320.00	64.00	Financial - Data Analysis
	Reviewing loan documents, assignment documents, and lender lists to create an analysis for payoffs.	1/20/2023	1.5	320.00	480.00	Financial - Data Analysis
Josh McGraw	Call with JPM re: payoff analysis for Texas 156.	1/20/2023	0.4	260.00	104.00	Legal - Asset Analysis and Recovery
Maggie Chavez	Call with JPM re: payoff analysis for Texas 156.	1/20/2023	0.4	260.00	104.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with MCC re: payoff analysis for Texas 156.	1/20/2023	0.4	320.00	128.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with GBW re: Texas 156 payoff.	1/20/2023	0.1	320.00	32.00	Legal - Asset Disposition
Geoff Winkler	Call with JPM re: Texas 156 payoff.	1/20/2023	0.1	395.00	39.50	Legal - Asset Disposition
John Hall	Arranging boxes for transportation to storage.	1/20/2023	3.5	350.00	1,225.00	Legal - Case Administration
Milana Barkhanoy	Arranging boxes for transportation to storage.	1/20/2023	3.5	300.00	1,050.00	Legal - Case Administration
Josh McGraw	Call with AMD re: investor communication.	1/20/2023	0.1	320.00	32.00	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
Summary of Fees of Receiver and Retained Personnel
January 1, 2023 - March 31, 2023
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Call with an investor re: update on their investments.	1/20/2023	0.4	320.00	128.00	Legal - Case Administration
Anna Priebe	Call with FedEx re: Nevada box pick up.	1/20/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Call with investor re: case.	1/20/2023	0.2	280.00	56.00	Legal - Case Administration
Amanda Deering	Call with JPM re: investor communication.	1/20/2023	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Call with JPM re: physical documents.	1/20/2023	0.1	300.00	30.00	Legal - Case Administration
Josh McGraw	Call with MBB re: physical documents.	1/20/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Communication with MBB re: box preparation. Drafting and editing quarter SFAR report and attachments and exhibit. Updating reports with feedback from GBW, and providing to counsel for submission.	1/20/2023	0.1	280.00	28.00	Legal - Case Administration
John Hall		1/22/2023	3.0	350.00	1,050.00	Financial - Status Reports
Josh McGraw	Call with GBW to discuss Texas 156.	1/23/2023	0.4	320.00	128.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM to discuss Texas 156.	1/23/2023	0.4	395.00	158.00	Legal - Asset Analysis and Recovery
Anna Priebe	Call with Extra Space Storage and receipt of CapSource boxes, stored for review.	1/23/2023	0.9	255.00	229.50	Legal - Case Administration
Amanda Deering	Call with investor re: FAQ.	1/23/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Call with KH re: Texas 156 sale, motions, and other entities to review.	1/23/2023	0.4	320.00	128.00	Legal - Case Administration
Josh McGraw	Conversation with JBH re: assistance from SB and GH on loan list.	1/23/2023	0.1	320.00	32.00	Legal - Case Administration
John Hall	Conversation with JPM re: assistance from SB and GH on loan list.	1/23/2023	0.1	350.00	35.00	Legal - Case Administration
Geoff Winkler	Discussing status report and other weekly meeting items with MBB, JBH, AMD, JPM, AMP and MCC.	1/23/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Discussing status report and other weekly meeting items with MBB, JBH, GBW, AMD, AMP and MCC.	1/23/2023	0.2	320.00	64.00	Legal - Case Administration
Amanda Deering	Discussing status report and other weekly meeting items with MBB, JBH, GBW, JPM, AMP and MCC.	1/23/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Email to SB and GH re: loan list information.	1/23/2023	0.1	320.00	32.00	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and confirmation of requested documents with AMD, GBW, JBH, MCC, AMP and JPM.	1/23/2023	0.2	300.00	60.00	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and confirmation of requested documents with AMD, GBW, JPM, MCC, AMP and MBB.	1/23/2023	0.2	350.00	70.00	Legal - Case Administration
John Hall	Review BT engagement letter, suggest edits, and discuss with GBW for execution.	1/23/2023	1.0	350.00	350.00	Legal - Case Administration
Anna Priebe	Team meeting to discuss document storage update, more.	1/23/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Updating weekly meeting agenda.	1/23/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Email to CE re: document request for Meadows 78 and King 261.	1/24/2023	0.1	320.00	32.00	Financial - Data Analysis
Anna Priebe	Reviewing box 32 from received documents in search of outstanding deals and digitization needs.	1/24/2023	1.1	255.00	280.50	Financial - Data Analysis
Josh McGraw	Reviewing JC Commercial loan documents and investment package.	1/24/2023	0.7	320.00	224.00	Financial - Data Analysis
John Hall	Call with GBW and EM re: Arc and related issues.	1/24/2023	0.4	350.00	140.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with JBH re: asset management.	1/24/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
John Hall	Call with JPM re: asset management.	1/24/2023	0.1	350.00	35.00	Legal - Asset Analysis and Recovery
Josh McGraw	Updated assets within KCC.	1/24/2023	0.9	320.00	288.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with AMP re: investor communication.	1/24/2023	0.5	320.00	160.00	Legal - Case Administration
Josh McGraw	Call with GBW re: meeting with JG.	1/24/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Call with investor re: 5th avenue investment and receivership resources.	1/24/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Call with investor re: JC Commercial investment and distribution timeline.	1/24/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Call with JG re: request for investment details. .	1/24/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Call with JPM re: investor communication.	1/24/2023	0.5	255.00	127.50	Legal - Case Administration
Geoff Winkler	Call with JPM re: meeting with JG.	1/24/2023	0.1	395.00	39.50	Legal - Case Administration
Geoff Winkler	Discussion with JBH and EM re: modified receiver order draft.	1/24/2023	0.5	395.00	197.50	Legal - Case Administration
Josh McGraw	Email to investors re: questions about their investment.	1/24/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Email to JPM re: potential investor.	1/24/2023	0.1	280.00	28.00	Legal - Case Administration
John Hall	GBW and EM discussion re: proposed receiver order.	1/24/2023	0.5	350.00	175.00	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

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Geoff Winkler	Review procedural history, previous filings, draft proposed language for parties.	1/24/2023	1.1	395.00	434.50	Legal - Case Administration
Anna Priebe	Updating registered investors from website and reviewing 3 emails from investors via website.	1/24/2023	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Verifying investor information based on communication with AMD re: individuals in multiple cases.	1/24/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Email to AMP re: list of loans with principal reductions.	1/25/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Email with CE re: King 261 and Meadows 78 documents.	1/25/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Reviewing account listings for King 261 and Meadows 78 to determine if additional information is needed.	1/25/2023	0.3	320.00	96.00	Financial - Data Analysis
Josh McGraw	Reviewing documentation provided by CE and responding with additional requests.	1/25/2023	0.4	320.00	128.00	Financial - Data Analysis
Anna Priebe	Discussion of transportation of Vegas documents with AMD.	1/25/2023	0.4	255.00	102.00	Legal - Case Administration
Amanda Deering	Discussion of transportation of Vegas documents with AMP.	1/25/2023	0.4	280.00	112.00	Legal - Case Administration
Josh McGraw	Emails with CE re: list of loans with principal reductions.	1/25/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Review and execute engagement agreement.	1/25/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Comparing physical documents to that in digital folder, reviewed for outstanding deals and digitization needs.	1/26/2023	2.7	255.00	688.50	Financial - Data Analysis
Josh McGraw	Meeting with AMP re: Weststar provided documentation and verification of physical documents.	1/26/2023	0.6	320.00	192.00	Financial - Data Analysis
Anna Priebe	Meeting with JPM re: Weststar provided documentation and verification of physical documents.	1/26/2023	0.6	255.00	153.00	Financial - Data Analysis
Josh McGraw	Call with investor re: update on 5th avenue and questions about IRA.	1/26/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Call with investor re: WQH Servicing loan and answering questions about the receivership estate.	1/26/2023	0.3	320.00	96.00	Legal - Case Administration
Josh McGraw	Call with JG re: requested items from SB and GH.	1/26/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Communication with GBW re: investor list reconciliation.	1/26/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Communication with JPM re: investor list reconciliation.	1/26/2023	0.1	395.00	39.50	Legal - Case Administration
Josh McGraw	Emails to investors re: the receivership, updates on their investments and answering questions.	1/26/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Investor communications update.	1/26/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Left voicemail with investor re: questions on updates.	1/26/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMP re: investor communication, asset information, and resources.	1/26/2023	1.0	320.00	320.00	Legal - Case Administration
Anna Priebe	Meeting with JPM re: investor communication, asset information, and resources.	1/26/2023	1.0	255.00	255.00	Legal - Case Administration
Anna Priebe	Comparing physical documents of over 40 boxes to that in digital folder, reviewed for outstanding deals and digitization needs.	1/27/2023	3.9	255.00	994.50	Financial - Data Analysis
Josh McGraw	Updating investor list with missing information.	1/27/2023	1.7	320.00	544.00	Financial - Data Analysis
Josh McGraw	Drafting the status report, incorporating updates for assets of the receivership estate, operational and financial updates, and creating exhibits.	1/27/2023	2.8	320.00	896.00	Financial - Status Reports
Josh McGraw	Call with investor regarding their investments.	1/27/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Discussing status report updates.	1/27/2023	0.3	280.00	84.00	Legal - Case Administration
Anna Priebe	Comparing physical documents in 12 boxes to that in digital folder, reviewed for outstanding deals and digitization needs.	1/28/2023	1.5	255.00	382.50	Financial - Data Analysis
Josh McGraw	Drafting status report and reviewing counsel provided information.	1/28/2023	2.6	320.00	832.00	Financial - Status Reports
Amanda Deering	Communication with JPM re: status report.	1/29/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Reviewing and updating status report.	1/29/2023	0.6	280.00	168.00	Legal - Case Administration
Josh McGraw	Email to GBW re: documents from SS.	1/30/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Reconciling investor lists for all active investments.	1/30/2023	2.2	320.00	704.00	Financial - Data Analysis
Josh McGraw	Reviewing documents from SS.	1/30/2023	0.7	320.00	224.00	Financial - Data Analysis
Josh McGraw	Call with GBW re: status report review.	1/30/2023	0.2	320.00	64.00	Financial - Status Reports

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Email to JBH and GBW re: draft of the status report.	1/30/2023	0.1	320.00	32.00	Financial - Status Reports
Josh McGraw	Finalizing draft of the status report.	1/30/2023	0.3	320.00	96.00	Financial - Status Reports
Josh McGraw	Reviewing and finalizing exhibits for status report with AMD.	1/30/2023	0.4	320.00	128.00	Financial - Status Reports
Amanda Deering	Reviewing and finalizing exhibits for status report with JPM.	1/30/2023	0.4	280.00	112.00	Financial - Status Reports
Josh McGraw	Updating exhibits for the status report.	1/30/2023	0.8	320.00	256.00	Financial - Status Reports
Josh McGraw	Discussing status report and other weekly meeting items with MBB, JBH, GBW, AMD, AMP, and MCC.	1/30/2023	0.2	320.00	64.00	Legal - Case Administration
Amanda Deering	Discussing status report and other weekly meeting items with MBB, JBH, GBW, JPM, AMP and MCC.	1/30/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Discussion with AMP re: Capsource investor list.	1/30/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Discussion with JPM re: Capsource investor list.	1/30/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to GBW re: entity renewals.	1/30/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Emailed JPM and AMD re: meeting notes.	1/30/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MBB, AMP, JPM.	1/30/2023	0.2	260.00	52.00	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MCC, AMP, JPM.	1/30/2023	0.2	300.00	60.00	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, MBB, MCC, AMP, JPM.	1/30/2023	0.2	350.00	70.00	Legal - Case Administration
Josh McGraw	Meeting with AMP and AMD to discuss operations and investor communication needs and next steps.	1/30/2023	0.7	320.00	224.00	Legal - Case Administration
Amanda Deering	Meeting with AMP and JPM to discuss operations and investor communication needs and next steps.	1/30/2023	0.7	280.00	196.00	Legal - Case Administration
Anna Priebe	Meeting with JPM and AMD re: investor communication and high priority asset management.	1/30/2023	0.7	255.00	178.50	Legal - Case Administration
Anna Priebe	Receipt of Weststar investor list.	1/30/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review documents from counsel, respond to email re: TM.	1/30/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Team meeting re: data analysis update and status report.	1/30/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Team meeting re: weekly update and indexing report.	1/30/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Updating investor list with new registrations for status report filing.	1/30/2023	0.8	320.00	256.00	Legal - Case Administration
Josh McGraw	Reconciling investor lists for all active investments.	1/31/2023	2.2	320.00	704.00	Financial - Data Analysis
Anna Priebe	Reviewing indexing spreadsheet to determine which boxes to move to storage.	1/31/2023	1.2	255.00	306.00	Financial - Data Analysis
Josh McGraw	Email to GBW and JBH re: the draft status report.	1/31/2023	0.1	320.00	32.00	Financial - Status Reports
Josh McGraw	Email to JBH and GBW re: adjustments made to the status report.	1/31/2023	0.1	320.00	32.00	Financial - Status Reports
Josh McGraw	Email to KH re: draft status report and exhibits for review.	1/31/2023	0.1	320.00	32.00	Financial - Status Reports
Geoff Winkler	Review report and edits to JPM.	1/31/2023	0.2	395.00	79.00	Financial - Status Reports
Josh McGraw	Reviewing KH's edits to the status report and sending email approval.	1/31/2023	0.3	320.00	96.00	Financial - Status Reports
Josh McGraw	Updating status report with requested changes.	1/31/2023	0.3	320.00	96.00	Financial - Status Reports
Anna Priebe	Call with AMD re: investor communication.	1/31/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Call with AMD re: investor website.	1/31/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Call with EM and JBH re: settlement steps.	1/31/2023	0.5	395.00	197.50	Legal - Case Administration
Josh McGraw	Call with investor re: status of their investment and entities within receivership.	1/31/2023	0.4	320.00	128.00	Legal - Case Administration
Geoff Winkler	Call with TM and KH re: case status and hearing.	1/31/2023	0.5	395.00	197.50	Legal - Case Administration
Anna Priebe	Calling 4 investors re: receivership questions.	1/31/2023	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Communication with AMP re: Capsource investor calls.	1/31/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Discuss filing status and methodology.	1/31/2023	0.1	395.00	39.50	Legal - Case Administration
John Hall	Discussion on ARC and claimants with GBW and EM.	1/31/2023	0.6	350.00	210.00	Legal - Case Administration
Amanda Deering	Discussion re: investor communication with AMP.	1/31/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Email to investor re: questions about their investment and contacts for CapWest Income.	1/31/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to JBH and GBW re: pleadings for website process.	1/31/2023	0.1	255.00	25.50	Legal - Case Administration

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Josh McGraw	Email to KH re: investor list for submission of the second status report.	1/31/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Emails to GBW and KH re: investor list to service notice of hearing and answering follow-up questions from KH.	1/31/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Improving investor communication via website.	1/31/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Meeting with AMD re: investor communication.	1/31/2023	0.7	320.00	224.00	Legal - Case Administration
Amanda Deering	Meeting with JPM re: investor communication.	1/31/2023	0.7	280.00	196.00	Legal - Case Administration
Anna Priebe	Meeting with JPM re: investor communication.	1/31/2023	0.7	255.00	178.50	Legal - Case Administration
Anna Priebe	Message to JPM re: CapSource investor calls.	1/31/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Pleadings update on website.	1/31/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Reviewing email from GBW and JBH re: notice to investors.	1/31/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Reviewing investor voicemails and 3 contact us form responses from website.	1/31/2023	0.6	255.00	153.00	Legal - Case Administration
Amanda Deering	Reviewing website management requests from JBH with AMP.	1/31/2023	0.2	280.00	56.00	Legal - Case Administration
Geoff Winkler	Review and process accounts payable.	2/1/2023	0.2	395.00	79.00	Legal - Case Administration
Geoff Winkler	Call with former counsel to discuss outstanding litigation, review files, discuss with current counsel.	2/1/2023	1.6	395.00	632.00	Legal - Case Administration
Josh McGraw	Call with investor re: update on their investment.	2/1/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Call with investor.	2/1/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Call with investor.	2/1/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: Capsource documents information.	2/1/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor call.	2/1/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor communication.	2/1/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: Capsource documents information.	2/1/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor call.	2/1/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor communication.	2/1/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Conversation with JBH re: tax filings and entity renewals.	2/1/2023	0.2	320.00	64.00	Legal - Case Administration
John Hall	Conversation with JPM re: tax filings and entity renewals.	2/1/2023	0.2	350.00	70.00	Legal - Case Administration
Josh McGraw	Email to investor re: status of King 261 and ARC RE.	2/1/2023	0.1	320.00	32.00	Legal - Case Administration
John Hall	Review and discuss second status report and outstanding items with GBW.	2/1/2023	0.5	350.00	175.00	Legal - Case Administration
Geoff Winkler	Review investor list filing questions, discuss with counsel KH.	2/1/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Reviewing emails from KH and GBW re: investor list and notice requirements for the upcoming hearing.	2/1/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Voicemail to investor re: FAQ.	2/1/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Review and discuss investor list with GBW, KH, KAE.	2/1/2023	0.5	350.00	175.00	Legal - Case Administration
Josh McGraw	Email to EM re: K-1 taxes for investors.	2/2/2023	0.1	320.00	32.00	Financial - Tax Issues
Geoff Winkler	Communication with AMP and AMD re: boxes move request.	2/2/2023	0.1	395.00	39.50	Legal - Case Administration
Amanda Deering	Communication with AMP and GBW re: boxes move request.	2/2/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Communication with JBH re: boxes move request.	2/2/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Email to EE re: filed pleadings.	2/2/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Emails with counsel, JMP, review draft language for investor notice per court direction.	2/2/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Emails with investors re: updates on their investment, status of distributions, and receivership.	2/2/2023	0.6	320.00	192.00	Legal - Case Administration
Geoff Winkler	Meeting with NK to discuss case status, asset turnover.	2/2/2023	0.9	395.00	355.50	Legal - Case Administration
Milana Barkhanoy	Reconciling case expenses.	2/2/2023	0.6	300.00	180.00	Legal - Case Administration
Josh McGraw	Reviewing court filings and minute orders.	2/2/2023	0.3	320.00	96.00	Legal - Case Administration
John Hall	Review EM K-1 and 1099 issues, discuss with JPM.	2/3/2023	0.4	350.00	140.00	Financial - Tax Issues
Josh McGraw	Call with AMP re: investor list, communication and process for identifying missing individuals.	2/3/2023	0.4	320.00	128.00	Legal - Case Administration
Geoff Winkler	Call with counsel to discuss outstanding litigation, call with former counsel, review paper documents.	2/3/2023	2.1	395.00	829.50	Legal - Case Administration
Josh McGraw	Call with investor re: outstanding investment and Royal Metals Group.	2/3/2023	0.5	320.00	160.00	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Anna Priebe	Call with JPM re: investor list.	2/3/2023	0.4	255.00	102.00	Legal - Case Administration
Anna Priebe	Called with investor re: receivership timeline and FAQs.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor voicemail.	2/3/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to 4 investors re: FAQs, claims process, updating contact information, receivership timeline.	2/3/2023	0.4	255.00	102.00	Legal - Case Administration
Anna Priebe	Email to JPM re: investor to call.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Email to JPM re: RingCentral voicemail.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors re: updates on their investment, receivership resources and affiliated investments or companies.	2/3/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Message with JPM re: investor voicemail.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Research to respond to investor FAQ via email.	2/3/2023	0.3	255.00	76.50	Legal - Case Administration
John Hall	Review and request access to daily pleading updates from KAE.	2/3/2023	0.3	350.00	105.00	Legal - Case Administration
Josh McGraw	Reviewing emails from AMP re: investors requesting information and a time to speak.	2/3/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Reviewing proposed language for noticing investors.	2/3/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Update of report to website.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Updating investor information per investor's request.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Updating weekly meeting agenda.	2/3/2023	0.1	280.00	28.00	Legal - Case Administration
Geoff Winkler	Communication with AMD re: preparing boxes while on site.	2/6/2023	0.1	395.00	39.50	Legal - Case Administration
Josh McGraw	Communication with AMP and AMD re: website updates.	2/6/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Communication with AMP and JPM re: website updates.	2/6/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Communication with GBW re: preparing boxes while on site.	2/6/2023	0.1	280.00	28.00	Legal - Case Administration
Maggie Chavez	Communication with JPM and AMD re: preparing boxes while on site.	2/6/2023	0.1	260.00	26.00	Legal - Case Administration
Josh McGraw	Communication with MCC and AMD re: preparing boxes while on site.	2/6/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Communication with MCC and JPM re: preparing boxes while on site.	2/6/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Discussing server, sale and other weekly meeting items with MBB, JBH, AMD, AMP and MCC.	2/6/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Discussing server, sale and other weekly meeting items with MBB, JBH, JPM, AMP and MCC.	2/6/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Email scheduling FedEx communication with AMD and JPM.	2/6/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Emails with JdC re payment of fees.	2/6/2023	0.1	395.00	39.50	Legal - Case Administration
Amanda Deering	FedEx communication with AMP.	2/6/2023	0.1	280.00	28.00	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, MBB, AMP, JPM.	2/6/2023	0.1	260.00	26.00	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, MCC, AMP, JPM.	2/6/2023	0.1	300.00	30.00	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, MCC, MBB, JPM.	2/6/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and other case activities with AMD, MBB, MCC, AMP, JPM.	2/6/2023	0.1	350.00	35.00	Legal - Case Administration
Amanda Deering	Meeting with AMP and JPM to discuss operations and investor communication needs and next steps.	2/6/2023	0.5	280.00	140.00	Legal - Case Administration
Anna Priebe	Message with JPM and AMD re: website updates.	2/6/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Operations meeting with AMD and AMP re: investor communication, indexing updates.	2/6/2023	0.5	320.00	160.00	Legal - Case Administration
Anna Priebe	Operations meeting with AMD and JPM re: investor communication, indexing updates.	2/6/2023	0.5	255.00	127.50	Legal - Case Administration
Amanda Deering	Planning for on-site boxes to be sent from Las Vegas to Portland.	2/6/2023	0.2	280.00	56.00	Legal - Case Administration
Geoff Winkler	Review calculation related to ARC investment, differences in calculations.	2/6/2023	0.8	395.00	316.00	Legal - Case Administration
Geoff Winkler	Review declaration and discuss with counsel.	2/6/2023	0.2	395.00	79.00	Legal - Case Administration
John Hall	Review KH draft declaration for GBW.	2/6/2023	0.2	350.00	70.00	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
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Josh McGraw	Converting contact information for data import into GoDaddy for email.	2/7/2023	1.1	320.00	352.00	Financial - Data Analysis
Josh McGraw	Review email from GBW re: ARC reconciliation and set a meeting to discuss.	2/7/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Reviewing affiliated entities financials.	2/7/2023	1.0	320.00	320.00	Financial - Data Analysis
Josh McGraw	Reviewing loan documentation for Global Bio Labs, Inc.	2/7/2023	1.2	320.00	384.00	Financial - Data Analysis
Geoff Winkler	Communication with AMD re: investor communication.	2/7/2023	0.1	395.00	39.50	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with AMD re: investor communication.	2/7/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication with GBW re: investor communication.	2/7/2023	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication with JPM re: investor communication.	2/7/2023	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with AMP re: investor communication, physical documentation review, interim distributions and outside entities.	2/7/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Call with investor re: distribution timeline for 5th Avenue Estates.	2/7/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Call with JPM re: investor communication, physical documentation review, interim distributions and outside entities.	2/7/2023	0.6	255.00	153.00	Legal - Case Administration
Anna Priebe	Call with KE re: information needed for motion and outside entities.	2/7/2023	0.5	320.00	160.00	Legal - Case Administration
Josh McGraw	Email to AMD re: investor contact information.	2/7/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to JPM re: boxes ready for storage.	2/7/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KE re: motion information.	2/7/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to KH re: serving investors on hearing and report availability.	2/7/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Preparation of SOP for the safe-keeping of physical documents.	2/7/2023	0.3	255.00	76.50	Legal - Case Administration
John Hall	Review Reg D investor issue from EM, discuss with JPM.	2/7/2023	0.4	350.00	140.00	Legal - Case Administration
Anna Priebe	Reviewed JPM notes re: physical documents to digitize and prepared information to investigate further.	2/7/2023	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Reviewing box inventory list provided by AP and requesting review of additional physical documents.	2/7/2023	0.6	320.00	192.00	Legal - Case Administration
Anna Priebe	Reviewing boxes of documents re: need for digitization.	2/7/2023	0.9	255.00	229.50	Legal - Case Administration
Josh McGraw	Reviewing documentation related to Reg D offering and email to JBH.	2/7/2023	0.2	320.00	64.00	Legal - Case Administration
Amanda Deering	Reviewing information for investor communication security.	2/7/2023	0.4	280.00	112.00	Legal - Case Administration
Josh McGraw	Updating motion information to provide to KE.	2/7/2023	0.7	320.00	224.00	Legal - Case Administration
Josh McGraw	Accessing imaged server and reviewing.	2/8/2023	1.1	320.00	352.00	Financial - Data Analysis
Josh McGraw	Conversation with JBH re: investments from affiliated entities.	2/8/2023	0.1	320.00	32.00	Financial - Data Analysis
John Hall	Conversation with JPM re: investments from affiliated entities.	2/8/2023	0.1	350.00	35.00	Financial - Data Analysis
Josh McGraw	Email to GBW re: external hard drive credentials.	2/8/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Email to KH and KE re: credentials to get into server image.	2/8/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Gathering banks statements for support of transactions for MBB.	2/8/2023	0.2	320.00	64.00	Financial - Data Analysis
Josh McGraw	Reviewing EquiSource bank statements and financials.	2/8/2023	1.7	320.00	544.00	Financial - Data Analysis
Josh McGraw	Updating GoDaddy database and fixing issues that occurred with data importing.	2/8/2023	1.3	320.00	416.00	Financial - Data Analysis
Josh McGraw	Reviewing transactions related to defendant activity with AMD.	2/8/2023	0.2	320.00	64.00	Financial - Forensic Accounting
Amanda Deering	Reviewing transactions related to defendant activity with JPM.	2/8/2023	0.2	280.00	56.00	Financial - Forensic Accounting
John Hall	Produce draft declaration, provide to SEC and discussion re: same.	2/8/2023	0.6	350.00	210.00	Financial - Tax Issues
Geoff Winkler	Review motion to employ tax professionals.	2/8/2023	0.1	395.00	39.50	Financial - Tax Issues
Geoff Winkler	Discuss asset sale with potential purchaser.	2/8/2023	0.3	395.00	118.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with investor re: request for an update on their investment.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Communication with AMD and JPM re: notice to investors.	2/8/2023	0.1	395.00	39.50	Legal - Case Administration
Amanda Deering	Communication with GBW and JPM re: notice to investors.	2/8/2023	0.1	280.00	28.00	Legal - Case Administration
John Hall	Conversation with AMP re: approval of moving documents to storage.	2/8/2023	0.1	350.00	35.00	Legal - Case Administration
Anna Priebe	Conversation with JBH re: approval of moving documents to storage.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Creating list of boxes missing documents.	2/8/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Discussion with AMP re: Digitizing the missing physical documents.	2/8/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Discussion with AMP re: Global Bio Labs.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Discussion with AMP re: mail merge to notice investors of hearing.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Discussion with investor re ARC option 3.	2/8/2023	0.2	395.00	79.00	Legal - Case Administration

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Anna Priebe	Discussion with JPM re: digitizing the missing physical documents.	2/8/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Discussion with JPM re: Global Bio Labs.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Discussion with JPM re: mail merge to notice investors of hearing.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Email to AMD and JPM re: transportation of physical documents.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: date of meetings with affiliated parties.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to JBH and JPM re: moving documents to storage.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Email to JPM re: investor list.	2/8/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Emails to investors re: upcoming hearing questions and their investments.	2/8/2023	0.4	320.00	128.00	Legal - Case Administration
Josh McGraw	Emails with KH re: noticing investors of the upcoming hearing.	2/8/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Executing certification and email to KH.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Meeting with AMD re: bringing documents from LV to Portland.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Messages with AMP re: bringing documents from LV to Portland.	2/8/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Messages with GBW re: bringing documents from LV to Portland.	2/8/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Noticing minute orders via website.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Physical document indexing audit.	2/8/2023	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Preparing hearing notices for investors with AMD.	2/8/2023	0.6	320.00	192.00	Legal - Case Administration
Amanda Deering	Preparing hearing notices for investors with JPM.	2/8/2023	0.6	280.00	168.00	Legal - Case Administration
Amanda Deering	Preparing physical mail to be sent to investors without emails re: hearing notice.	2/8/2023	0.5	280.00	140.00	Legal - Case Administration
Geoff Winkler	Review payments ties between CWIF and JJ.	2/8/2023	0.2	395.00	79.00	Legal - Case Administration
	Reviewing and editing plan for sending 131 boxes sent from AMP and discussing with AMP.	2/8/2023	0.5	280.00	140.00	Legal - Case Administration
Amanda Deering	Reviewing and providing feedback on investor communication to JPM.	2/8/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Reviewing document transport to storage from AMP.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Reviewing edits from AMD re: investor notification.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Reviewing investor list from AMD.	2/8/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Reviewing investor list from JPM.	2/8/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Reviewing digitized documents to determine if deed information was available.	2/9/2023	0.3	320.00	96.00	Financial - Data Analysis
Geoff Winkler	Review email regarding the appointment of tax professionals.	2/9/2023	0.1	395.00	39.50	Financial - Tax Issues
Josh McGraw	Call and left message with investor re: documentation request on their investment.	2/9/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Call with GBW re: investor request and distribution motion.	2/9/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Call with investor re: update on King 261 and ARC RE.	2/9/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: investor request and distribution motion.	2/9/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Confirming investors were registered and received emails.	2/9/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Conversing with AMP re: investor communication.	2/9/2023	0.3	320.00	96.00	Legal - Case Administration
Josh McGraw	Discussing on-site work for physical document transfer with AMD.	2/9/2023	0.3	320.00	96.00	Legal - Case Administration
Amanda Deering	Discussing on-site work for physical document transfer with JPM.	2/9/2023	0.3	280.00	84.00	Legal - Case Administration
Geoff Winkler	Discussion with investor re monthly payments.	2/9/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Email to investor re: 5th Avenue Estates status.	2/9/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to investor re: location of the upcoming hearing.	2/9/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Message to AMD re: shipping labels for boxes.	2/9/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Messages with JPM re: investor communication.	2/9/2023	0.3	255.00	76.50	Legal - Case Administration
Amanda Deering	Preparing status report.	2/9/2023	0.4	280.00	112.00	Legal - Case Administration
Anna Priebe	Reviewing and editing FedEx procedure of moving physical documents.	2/9/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing physical files of bank statements, deal documents and check copies from SL.	2/10/2023	2.4	320.00	768.00	Financial - Data Analysis
Josh McGraw	Communication with AMP re: digitizing boxes.	2/10/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: digitizing boxes.	2/10/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Discussing processing digital information with AMD.	2/10/2023	0.5	255.00	127.50	Legal - Case Administration
Amanda Deering	Discussing processing digital information with AMP.	2/10/2023	0.5	280.00	140.00	Legal - Case Administration
Geoff Winkler	Discussion with investor re HT and IRA related issues.	2/10/2023	0.3	395.00	118.50	Legal - Case Administration

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Anna Priebe	FedEx research, calls with customer service, and pricing guide for shipping 131 boxes.	2/10/2023	1.9	255.00	484.50	Legal - Case Administration
Geoff Winkler	Message with AMP re: FedEx shipping physical documents.	2/10/2023	0.1	395.00	39.50	Legal - Case Administration
Anna Priebe	Moving 28 bankers boxes worth of documents to storage unit.	2/10/2023	2.5	255.00	637.50	Legal - Case Administration
Josh McGraw	Moving 28 bankers boxes worth of documents to storage unit.	2/10/2023	2.5	320.00	800.00	Legal - Case Administration
Geoff Winkler	Review payment stream and investment in additional companies.	2/10/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Email to CE re: Doumani documentation.	2/13/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Reviewing Doumani loan documents and assignment documentation.	2/13/2023	1.2	320.00	384.00	Financial - Data Analysis
Geoff Winkler	Discussion with counsel re Texas property, lawsuits.	2/13/2023	0.2	395.00	79.00	Legal - Asset Analysis and Recovery
Josh McGraw	Discussion with GBW re properties, details for counsel, litigation purposes.	2/13/2023	0.3	320.00	96.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Discussion with JPM re properties, details for counsel, litigation purposes.	2/13/2023	0.3	395.00	118.50	Legal - Asset Analysis and Recovery
Josh McGraw	Building summary of outstanding deals for motion.	2/13/2023	0.9	320.00	288.00	Legal - Case Administration
Anna Priebe	Call with Regus re: FedEx shipping.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Communication with AMD re: moving documents.	2/13/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Communication with AMP re: moving documents.	2/13/2023	0.2	280.00	56.00	Legal - Case Administration
Anna Priebe	Conversation and messages with MCC re: freight for documents.	2/13/2023	0.3	255.00	76.50	Legal - Case Administration
Maggie Chavez	Discussing and arranging documents shipping options and storage with MBB.	2/13/2023	0.5	260.00	130.00	Legal - Case Administration
Milana Barkhanoy	Discussing and arranging documents shipping options and storage with MCC.	2/13/2023	0.5	300.00	150.00	Legal - Case Administration
Josh McGraw	Discussing document transfer and investor communication with AMD and AMP.	2/13/2023	0.5	320.00	160.00	Legal - Case Administration
Anna Priebe	Discussing document transfer and investor communication with JPM and AMD.	2/13/2023	0.5	255.00	127.50	Legal - Case Administration
Amanda Deering	Discussing document transfer and investor communication with JPM and AMP.	2/13/2023	0.5	280.00	140.00	Legal - Case Administration
Amanda Deering	Discussing shipping labels and delivery timing with MCC.	2/13/2023	0.2	280.00	56.00	Legal - Case Administration
Josh McGraw	Email to investor requesting to update contact information in database.	2/13/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to KH and KE re: outstanding deal summaries.	2/13/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to Regus and AMD re: FedEx directions.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, JPM, AMP, MBB.	2/13/2023	0.1	260.00	26.00	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, MCC, AMP, JPM.	2/13/2023	0.1	300.00	30.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, MCC, AMP, MBB.	2/13/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with AMD, JBH, MCC, MBB, JPM.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and other case activities with AMD, MBB, MCC, AMP, JPM.	2/13/2023	0.1	350.00	35.00	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, JPM.	2/13/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Message to team re: delivery of documents.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Messages with AMP re: FedEx shipping for physical documents.	2/13/2023	0.2	395.00	79.00	Legal - Case Administration
Geoff Winkler	Messages with AMP re: FedEx shipping physical documents.	2/13/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Messages with GBW re: FedEx shipping for physical documents.	2/13/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Order necessary items to safely transport documents.	2/13/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Preparing and printing shipping labels, speaking with FedEx, and finalizing delivery of 131	2/13/2023	1.7	255.00	433.50	Legal - Case Administration
Anna Priebe	Research and call with FedEx re: fixing documents to be shipped.	2/13/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Emails to investors requesting updates on the case, investments and timeline for distribution.	2/14/2023	0.7	320.00	224.00	Legal - Case Administration
Geoff Winkler	Emails with counsel KE re meeting to discuss ancillary litigation.	2/14/2023	0.1	395.00	39.50	Legal - Case Administration
Anna Priebe	Updated pleadings on website.	2/14/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Call with investor re: questions on claims.	2/15/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Creating excel to plan to digitize remaining documents.	2/15/2023	0.9	255.00	229.50	Legal - Case Administration
Anna Priebe	Email to investor re: status report.	2/15/2023	0.1	255.00	25.50	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Maggie Chavez	Preparing 131 boxes of documents to be transferred with AMD.	2/15/2023	4.5	260.00	1,170.00	Legal - Case Administration
Amanda Deering	Preparing 131 boxes of documents to be transferred with MCC.	2/15/2023	4.5	280.00	1,260.00	Legal - Case Administration
Anna Priebe	Review of 25 bankers boxes to determine missing documents.	2/15/2023	1.5	255.00	382.50	Legal - Case Administration
Josh McGraw	Call and communication with AMP re: FedEx pick up of physical documentation.	2/16/2023	0.2	320.00	64.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to KH and KE re: King 261 lot sales.	2/16/2023	0.1	320.00	32.00	Legal - Asset Disposition
Anna Priebe	Call with FedEx re: picking up documents.	2/16/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Call with JPM re: documents for FedEx.	2/16/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Emails to KE re: outside entities of the receivership and summary of those entities.	2/16/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Meeting with GBW and KE re: interim distribution motion, sales procedures and outside entities.	2/16/2023	1.5	320.00	480.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM and KE re: interim distribution motion, sales procedures, and outside entities.	2/16/2023	1.5	395.00	592.50	Legal - Case Administration
Josh McGraw	Moving 30 boxes to be prepared for transport to Portland.	2/16/2023	0.9	320.00	288.00	Legal - Case Administration
Amanda Deering	Supporting FedEx box move.	2/16/2023	0.4	280.00	112.00	Legal - Case Administration
Maggie Chavez	Supporting FedEx box move.	2/16/2023	0.4	260.00	104.00	Legal - Case Administration
Josh McGraw	Email to CB re: payoff letter.	2/17/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to CB re: wiring instructions and explaining receivership process to developer.	2/17/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to CE re: confirming approval of partial payoff letter would come from receivership prior to closing.	2/17/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to CE re: lot closing date and partial payoff amount.	2/17/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing email from CE re: fees, spread and delinquency calculation for King 261.	2/17/2023	0.2	320.00	64.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing King 261 loan documentation.	2/17/2023	1.1	320.00	352.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing payoff letter and confirming the fees being shown.	2/17/2023	0.4	320.00	128.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with GBW to discuss a partial payoff from the developer.	2/17/2023	0.1	320.00	32.00	Legal - Asset Disposition
Geoff Winkler	Call with JPM to discuss a partial payoff from the developer.	2/17/2023	0.1	395.00	39.50	Legal - Asset Disposition
Josh McGraw	Email to GBW re: King 261 payoff letter request.	2/17/2023	0.1	320.00	32.00	Legal - Asset Disposition
Geoff Winkler	Work with CB and JMP re lot closings next week.	2/17/2023	0.3	395.00	118.50	Legal - Asset Disposition
Amanda Deering	Call with investor re: case update.	2/17/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Call with investor re: receivership timeline, registering for updates.	2/17/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Call with investor to discuss status and upcoming hearing.	2/17/2023	0.3	395.00	118.50	Legal - Case Administration
Maggie Chavez	Coordinating the delivery of 131 physical boxes of case files.	2/17/2023	0.8	260.00	208.00	Legal - Case Administration
Maggie Chavez	Discussion with AMP re: FedEx delivery date.	2/17/2023	0.1	260.00	26.00	Legal - Case Administration
Anna Priebe	Discussion with MCC re: FedEx delivery date.	2/17/2023	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Email from EC re 2022 tax preparation.	2/17/2023	0.1	300.00	30.00	Legal - Case Administration
Anna Priebe	Left voicemails to 2 investors re: questions about claims.	2/17/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with AMP re: physical documentation review for digitization or storage.	2/17/2023	1.0	320.00	320.00	Legal - Case Administration
Anna Priebe	Meeting with JPM re: physical documentation review for digitization or storage.	2/17/2023	1.0	255.00	255.00	Legal - Case Administration
Anna Priebe	Messages with JPM re: calling investors.	2/17/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Prepared investor list for contacts needed.	2/17/2023	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Review additional litigation disclosed, discuss with counsel KH.	2/17/2023	0.4	395.00	158.00	Legal - Case Administration
John Hall	Review draft declaration from BT, discuss with GBW and send to KH KAE for filing.	2/20/2023	0.4	350.00	140.00	Financial - Tax Issues
John Hall	Review request from KH and provide signed engagement letter with memo re: same.	2/21/2023	0.2	350.00	70.00	Financial - Tax Issues
Josh McGraw	Emails with CB re: King 261 payoff and wiring confirmations.	2/21/2023	0.2	320.00	64.00	Legal - Asset Disposition
Josh McGraw	Emails with CE re: payoff letter and summarizing requested changes for closing.	2/21/2023	0.3	320.00	96.00	Legal - Asset Disposition
Josh McGraw	Reviewing payoff letters from CE.	2/21/2023	0.4	320.00	128.00	Legal - Asset Disposition

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Anna Priebe	3 phone calls with 3 investors re: 5th Avenue, notice of upcoming hearing, and Texas 156.	2/21/2023	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Communication with AMD re: JC Holdings.	2/21/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Communication with AMD re: registrations.	2/21/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Communication with JPM re: JC Holdings.	2/21/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Communication with JPM re: registrations.	2/21/2023	0.1	280.00	28.00	Legal - Case Administration
Amanda Deering	Communication with SB re: JC Holdings.	2/21/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Confirming investors contact information to determine reasons for not receiving email updates.	2/21/2023	0.4	320.00	128.00	Legal - Case Administration
Anna Priebe	Email to investor re: status report of 5th Avenue.	2/21/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors re: requested updates on their investments and receivership information.	2/21/2023	0.4	320.00	128.00	Legal - Case Administration
Anna Priebe	Emails to three investors re: Capsource resource and pleadings.	2/21/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Meeting with AMP re: investor communication.	2/21/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Meeting with AMP re: preparation for receipt of physical documents and storage of items.	2/21/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Meeting with JPM re: investor communication.	2/21/2023	0.6	255.00	153.00	Legal - Case Administration
Anna Priebe	Meeting with JPM re: preparation for receipt of physical documents and storage of items.	2/21/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Messages with AMP re: investor communication.	2/21/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Messages with JPM re: investor communication.	2/21/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Preparing and sending email to investor re: investment questions and timeline.	2/21/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Research Dewitt Bank and Trust. Call with SB re: FMV calculation for IRAs.	2/21/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Review and approve motion.	2/21/2023	0.1	395.00	39.50	Legal - Case Administration
Geoff Winkler	Review and execute engagement letter for counsel.	2/21/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Call with KH and GBW re: King 261 lot sales.	2/22/2023	0.5	320.00	160.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with KH and JPM re: King 261 lot sales.	2/22/2023	0.5	395.00	197.50	Legal - Asset Analysis and Recovery
Josh McGraw	Creating receivership recovery analysis and summarizing receivership activities for upcoming hearing.	2/22/2023	1.4	320.00	448.00	Legal - Asset Analysis and Recovery
Anna Priebe	3 phone calls with Extra Space Storage re: delivery of documents.	2/22/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Call to FedEx re: reschedule due to weather.	2/22/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Call with counsel to discuss upcoming hearing.	2/22/2023	0.3	395.00	118.50	Legal - Case Administration
Anna Priebe	Call with investor re: closing and liquidating IRA.	2/22/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Called FedEx to update delivery of documents.	2/22/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: rescheduled of physical document delivery.	2/22/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Coordinate online hearing appearance with court.	2/22/2023	0.1	395.00	39.50	Legal - Case Administration
Josh McGraw	Discussing 1099s with AMD.	2/22/2023	0.2	320.00	64.00	Legal - Case Administration
Amanda Deering	Discussing 1099s with JPM.	2/22/2023	0.2	280.00	56.00	Legal - Case Administration
Geoff Winkler	Discussion with counsel re items to discuss in upcoming hearing.	2/22/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Email to GBW re: recovery analysis.	2/22/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to investor re: registration and status reports.	2/22/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	FedEx site navigation to reschedule deliveries.	2/22/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Left voicemail with Extra Space Storage re: rescheduled delivery.	2/22/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMP re: coordination of physical documentation delivery, investor communication pertaining to affiliated entities, motions, and upcoming hearing deliverables.	2/22/2023	1.2	320.00	384.00	Legal - Case Administration
Anna Priebe	Meeting with JPM re: coordination of physical documentation delivery, investor communication pertaining to affiliated entities, motions, and upcoming hearing deliverables.	2/22/2023	1.2	255.00	306.00	Legal - Case Administration
Anna Priebe	Message to JPM re: rescheduled boxes.	2/22/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Messages to AMP re: rescheduling FedEx delivery.	2/22/2023	0.4	260.00	104.00	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Anna Priebe	Messages to MCC re: rescheduling FedEx delivery.	2/22/2023	0.4	255.00	102.00	Legal - Case Administration
Geoff Winkler	Prepare for upcoming hearing.	2/22/2023	1.5	395.00	592.50	Legal - Case Administration
Maggie Chavez	Rescheduling delivery of 131 physical boxes.	2/22/2023	0.7	260.00	182.00	Legal - Case Administration
Josh McGraw	Reviewing documentation received from investors.	2/22/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Reviewing ARC promissory notes, restructuring agreements and documents provided by SS.	2/23/2023	1.5	320.00	480.00	Financial - Data Analysis
Josh McGraw	Reviewing ARC reconciliation from EM, tracing differences from prior reconciliation and summarizing to discuss with GBW.	2/23/2023	2.8	320.00	896.00	Financial - Data Analysis
Josh McGraw	Searching NV Secretary of State to determine managing members of ARC affiliated LLCs.	2/23/2023	0.4	320.00	128.00	Financial - Data Analysis
John Hall	Review outstanding tax issues with MMB and GBW.	2/23/2023	0.3	350.00	105.00	Financial - Tax Issues
Josh McGraw	Discussing ARC reconciliation with AMD.	2/23/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Amanda Deering	Discussing reconciliation with JPM.	2/23/2023	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Anna Priebe	2 voicemails and 2 phone calls with investors re: Meadows 78, registering on website, and FAQs.	2/23/2023	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Call with AMP re: investor communication regarding hearing.	2/23/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Call with GBW re: ARC reconciliation and entity renewals.	2/23/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: ARC reconciliation and entity renewals.	2/23/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Call with JPM re: investor communication regarding hearing.	2/23/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Communication with AMD and AMP re: website management.	2/23/2023	0.2	395.00	79.00	Legal - Case Administration
Amanda Deering	Communication with GBW and AMP re: website management.	2/23/2023	0.3	280.00	84.00	Legal - Case Administration
Geoff Winkler	Communication with JPM re: uploading pleadings to the investor website.	2/23/2023	0.1	395.00	39.50	Legal - Case Administration
John Hall	Discuss case updates and new tasks with GBW, update staff.	2/23/2023	0.3	350.00	105.00	Legal - Case Administration
Geoff Winkler	Discuss case updates and new tasks with JBH as result of hearing.	2/23/2023	0.3	395.00	118.50	Legal - Case Administration
Geoff Winkler	Discussion with counsel, review and execute oaths.	2/23/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Email to investor re: registration.	2/23/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Hearing with court, counsel KH, and TM with the SEC.	2/23/2023	1.2	395.00	474.00	Legal - Case Administration
Josh McGraw	Merging documents and exhibits and uploading pleadings to the investor website.	2/23/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Message to JPM re: pleading to put on investor website.	2/23/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Messages with AMP re: pleading to put on investor website.	2/23/2023	0.1	395.00	39.50	Legal - Case Administration
Anna Priebe	Messages with GBW and AMD re: website management.	2/23/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Messages with GBW and AMP re: uploading pleadings to the investor website.	2/23/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Prepare for upcoming hearing.	2/23/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Reviewing ARC promissory notes, restructuring agreements and documents provided by SS.	2/24/2023	0.8	320.00	256.00	Financial - Data Analysis
John Hall	Research received documents for historical tax records, request JPM identify needed items on hard copy or server.	2/24/2023	0.6	350.00	210.00	Financial - Tax Issues
Josh McGraw	Communication and email to GBW re: meeting to discuss reconciliation.	2/24/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with JPM re: meeting to discuss reconciliation.	2/24/2023	0.1	395.00	39.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with AMP re: investor communication and outstanding voicemails.	2/24/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Call with JPM re: investor communication and outstanding voicemails.	2/24/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to JBH re: tax returns.	2/24/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Indexing tax returns provided by SL.	2/24/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Reviewed compiled financial information, discuss with JPM.	2/24/2023	0.5	395.00	197.50	Legal - Case Administration
Anna Priebe	Updated 4 pleadings and 2 exhibits to website.	2/24/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Email to investor re: website update.	2/25/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Prepare four AP.	2/27/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Email to CB re: closing date for lots associated with King 261.	2/27/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to GBW re: ARC reconciliation.	2/27/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to GBW re: forecast for King 261 and potential paydown date.	2/27/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with AMP re: affiliated entities.	2/27/2023	0.3	320.00	96.00	Legal - Case Administration

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Anna Priebe	Communication with JPM re: affiliated entities.	2/27/2023	0.3	255.00	76.50	Legal - Case Administration
Amanda Deering	Discussing loan details.	2/27/2023	0.1	280.00	28.00	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and other case activities with AMD, MBB, MCC, GBW, AMP, JPM.	2/27/2023	0.1	350.00	35.00	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication, status report and other case activities with GBW, AMD, JBH, MBB, AMP, JPM.	2/27/2023	0.1	260.00	26.00	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with GBW, AMD, JBH, MCC, AMP, JPM.	2/27/2023	0.1	300.00	30.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMD, AMP and GBW.	2/27/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMD, AMP and JPM.	2/27/2023	0.1	395.00	39.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, JPM and GBW.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Message to AFS team re: delivery of 131 bankers boxes to storage.	2/27/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Moved 131 bankers boxes into Portland storage.	2/27/2023	2.3	255.00	586.50	Legal - Case Administration
Josh McGraw	Moved 131 bankers boxes into Portland storage.	2/27/2023	2.3	320.00	736.00	Legal - Case Administration
Josh McGraw	Reviewing affiliated individuals to determine prior investments.	2/27/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Process one AR and four AP, confirm with bank.	2/28/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Reviewing bank account to confirm amount received from King 261 lot sales.	2/28/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with AMP re: investors communication and outstanding calls.	2/28/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Call with JPM re: investors communication and outstanding calls.	2/28/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor requesting assistance on outstanding loans.	2/28/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor requesting assistance on outstanding loans.	2/28/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KH re: investor requesting assistance with transferring deed of trust.	2/28/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Left voicemail for investor re: transferring deeds.	2/28/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Messages with JPM re: investor transferring deeds.	2/28/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Review of email from KH re: investor communication.	2/28/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing outstanding loans for investor and requesting additional documentation from CE.	2/28/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Updated two court filings to website.	2/28/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Visit to Extra Space Storage re: recovering documents.	2/28/2023	0.8	255.00	204.00	Legal - Case Administration
Geoff Winkler	Reconcile bank accounts, transactions, look for changes.	3/1/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Meeting with AMD and AMP to discuss investor communication and asset sales and management for the week.	3/1/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Meeting with JPM and AMP to discuss investor communication and asset sales and management for the week.	3/1/2023	0.3	255.00	76.50	Legal - Case Administration
Amanda Deering	Meeting with JPM and AMP to discuss investor communication and asset sales and management for the week.	3/1/2023	0.3	280.00	84.00	Legal - Case Administration
Josh McGraw	Reviewing loan documents related to AM.	3/2/2023	0.7	320.00	224.00	Financial - Data Analysis
Josh McGraw	Reviewing software options to view imaged server and loading server for review with the preferred program.	3/2/2023	1.2	320.00	384.00	Financial - Data Analysis
Josh McGraw	Creating notes for physical documents to digitize.	3/2/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Discussion with AMP re hearing update, distribution timeline.	3/2/2023	0.1	395.00	39.50	Legal - Case Administration
Josh McGraw	Meeting with AMD re: investor communication.	3/2/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Meeting with JPM re: investor communication.	3/2/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Messages and email with MCC re: digitizing boxes.	3/2/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Review of JPM notes re: boxes to digitize first.	3/2/2023	0.4	255.00	102.00	Legal - Case Administration

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Geoff Winkler	Review shipping proposal and costs.	3/2/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Sorting through boxes for digitization process, investigation for unknown outstanding loans, and recovery of records with AMP.	3/3/2023	2.3	320.00	736.00	Financial - Data Analysis
Anna Priebe	Sorting through boxes for digitization process, investigation for unknown outstanding loans, and recovery of records with JPM.	3/3/2023	2.3	255.00	586.50	Financial - Data Analysis
Josh McGraw	Communication with AMP re: digitization options.	3/3/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: digitization options.	3/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Communication with MCC re: digitization efforts.	3/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Communication with Regus and research into digitization pricing options.	3/3/2023	0.3	255.00	76.50	Legal - Case Administration
Anna Priebe	Digitization of documents.	3/3/2023	3.2	255.00	816.00	Legal - Case Administration
Anna Priebe	Email to JPM re: BF documents.	3/3/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Reviewing an email from AMP re: BF documents	3/3/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing documents related to BF.	3/3/2023	0.7	320.00	224.00	Legal - Case Administration
Anna Priebe	Digitizing documents.	3/4/2023	4.1	255.00	1,045.50	Legal - Case Administration
Anna Priebe	Digitizing documents.	3/5/2023	10.7	255.00	2,728.50	Legal - Case Administration
Josh McGraw	Call with GBW re: Texas 156 offer and allocation of offer.	3/6/2023	0.2	320.00	64.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: Texas 156 offer and allocation of offer.	3/6/2023	0.2	395.00	79.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with AMD re: loan from Weststar.	3/6/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication with JPM re: loan from Weststar.	3/6/2023	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Amanda Deering	Email from JPM re: loan from Weststar.	3/6/2023	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to AMD re: loan from Weststar.	3/6/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with AMP re: Investor communication, draft motion for interim distributions and stipulation to sell deeds for trust.	3/6/2023	0.5	320.00	160.00	Legal - Case Administration
Anna Priebe	Call with JPM re: Investor communication, draft motion for interim distributions and stipulation to sell deeds for trust.	3/6/2023	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, AMD and GBW.	3/6/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, JPM and AMD.	3/6/2023	0.1	395.00	39.50	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, JPM and GBW.	3/6/2023	0.1	280.00	28.00	Legal - Case Administration
Anna Priebe	Preparing communication to 12 investors regarding FAQs and hearing questions.	3/6/2023	0.8	255.00	204.00	Legal - Case Administration
Anna Priebe	Updated investor list with new registration details.	3/6/2023	0.7	255.00	178.50	Legal - Case Administration
Maggie Chavez	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, JBH, MBB.	3/6/2023	0.1	260.00	26.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, MBB, MCC.	3/6/2023	0.1	300.00	30.00	Legal - Case Administration
John Hall	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, MBB, MCC.	3/6/2023	0.1	350.00	35.00	Legal - Case Administration
Josh McGraw	Call with AMP re: investor communication and discussing interim distribution process.	3/7/2023	1.1	320.00	352.00	Legal - Case Administration
Anna Priebe	Call with JPM re: investor communication and discussing interim distribution process.	3/7/2023	1.1	255.00	280.50	Legal - Case Administration
Geoff Winkler	Email from JDC re pre-receivership work, email to KH to discuss approach.	3/7/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Email to AMP re: interim distribution motion.	3/7/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Emails to 6 investors regarding FAQs and updates surrounding hearing.	3/7/2023	0.6	255.00	153.00	Legal - Case Administration
Anna Priebe	Investor communications including 3 phone calls, listening to voicemails, and giving update regarding website.	3/7/2023	0.9	255.00	229.50	Legal - Case Administration
John Hall	Review draft motion from KAE on interim distribution plan and real property sales procedures, discuss with GBW.	3/7/2023	0.7	350.00	245.00	Legal - Case Administration
Geoff Winkler	Review LV litigation complaint, status.	3/7/2023	0.3	395.00	118.50	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Call with AMD and AMP re: distribution motion, server and investor communication.	3/8/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Call with JPM and AMD re: distribution motion, server and investor communication.	3/8/2023	0.3	255.00	76.50	Legal - Case Administration
Amanda Deering	Call with JPM and AMP re: distribution motion, server and investor communication.	3/8/2023	0.3	280.00	84.00	Legal - Case Administration
Phil Chen	Discussion with JPM re: entity formations of investments and visual structure.	3/8/2023	0.5	260.00	130.00	Legal - Case Administration
Josh McGraw	Discussion with PCC re: entity formations of investments and visual structure.	3/8/2023	0.5	320.00	160.00	Legal - Case Administration
John Hall	Review notice of non opposition and transcript of proceedings, discuss with GBW,	3/8/2023	0.3	350.00	105.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor calls.	3/9/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor calls.	3/9/2023	0.2	255.00	51.00	Legal - Case Administration
Phil Chen	Discussion with JPM re: affiliated entities, physical document review, and structure of defendant entity.	3/9/2023	0.5	260.00	130.00	Legal - Case Administration
Josh McGraw	Discussion with PCC re: affiliated entities, physical document review, and structure of defendant entity.	3/9/2023	0.5	320.00	160.00	Legal - Case Administration
Josh McGraw	Email to JBH re: investor communication.	3/9/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Moving 26 boxes to storage with AMD.	3/9/2023	2.0	255.00	510.00	Legal - Case Administration
Amanda Deering	Moving boxes to storage with AMP.	3/9/2023	2.0	280.00	560.00	Legal - Case Administration
John Hall	Review memo from SB, discuss wit GBW and reply email.	3/9/2023	0.2	350.00	70.00	Legal - Case Administration
Anna Priebe	Updating investor registration and responding to 1 investor email re: hearing update.	3/9/2023	0.2	255.00	51.00	Legal - Case Administration
John Hall	Review tax inquiry from EC.	3/10/2023	0.1	350.00	35.00	Financial - Tax Issues
Josh McGraw	Call and messages with AMP re: streamlining investor communication.	3/10/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Call and messages with JPM re: streamlining investor communication.	3/10/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with AMP re: investor communication and estimates on motion.	3/10/2023	0.4	320.00	128.00	Legal - Case Administration
Anna Priebe	Call with JPM re: investor communication and estimates on motion.	3/10/2023	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Calls with investors re: updates from the court hearing, the timeline for distributions on their investments and recovery amount.	3/10/2023	0.8	320.00	256.00	Legal - Case Administration
Josh McGraw	Emails to investors re: ARC Re and 5th Ave. status and distribution timeline.	3/10/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Review court order and discuss with tax accountant.	3/10/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Reviewing second draft of interim distribution plan.	3/10/2023	0.6	320.00	192.00	Legal - Case Administration
Anna Priebe	Streamlining investor communications.	3/10/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Conferring with JPM regarding future strategy on the liquidation of assets.	3/13/2023	0.4	260.00	104.00	Legal - Asset Disposition
Josh McGraw	Call with GBW re: entity renewals and motion review.	3/13/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Call with investor re: distribution timeline.	3/13/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: entity renewals and motion review.	3/13/2023	0.1	395.00	39.50	Legal - Case Administration
Josh McGraw	Conversation with MCC re: sales procedures for investments.	3/13/2023	0.4	320.00	128.00	Legal - Case Administration
Josh McGraw	Email to GBW re: investor question on switching accounts.	3/13/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to GBW re: summary of changes for interim distribution plan.	3/13/2023	0.1	320.00	32.00	Legal - Case Administration
Maggie Chavez	Reporting professional time to JBH for February.	3/13/2023	0.3	260.00	78.00	Legal - Case Administration
Geoff Winkler	Review additional litigation, research files for additional information, prepare for discussion with counsel.	3/13/2023	0.4	395.00	158.00	Legal - Case Administration
Geoff Winkler	Review information related to JC Commercial including pleadings, loan docs, property tax statements, investment package.	3/13/2023	0.4	395.00	158.00	Legal - Case Administration
Geoff Winkler	Review SP settlement documents, receiver's report.	3/13/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Reviewing second draft of interim distribution plan.	3/13/2023	1.5	320.00	480.00	Legal - Case Administration
Josh McGraw	Reviewing SOS for entities that will need to be renewed.	3/13/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Call with GBW re: documentation identified for JC Commercial loan.	3/14/2023	0.5	320.00	160.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: documentation identified for JC Commercial loan.	3/14/2023	0.5	395.00	197.50	Legal - Asset Analysis and Recovery
Josh McGraw	Emails to GBW re: documentation identified and support for review.	3/14/2023	0.2	320.00	64.00	Legal - Asset Analysis and Recovery

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 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Reviewing documents related to JC Commercial loan.	3/14/2023	1.5	320.00	480.00	Legal - Asset Analysis and Recovery
Josh McGraw	Calls with investor re: update on interim distributions, supporting documentation for their investments and receivership resources.	3/14/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: pleadings and investor communication.	3/14/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Emails to investors re: updates on the hearing, interim distributions and questions on their investments.	3/14/2023	1.1	320.00	352.00	Legal - Case Administration
Anna Priebe	Pleadings placeholder.	3/14/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review and edit proposed motion for approval of interim distribution plan, discussion with counsel.	3/14/2023	0.3	395.00	118.50	Legal - Case Administration
Geoff Winkler	Review investor question related to IRA investment, holding company, emails with JPM.	3/14/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Call with investor re: investment documentation to be provided to the receiver.	3/15/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Emails to investors re: updates on their investment and confirming documents received.	3/15/2023	0.3	320.00	96.00	Legal - Case Administration
Josh McGraw	Meeting with KH, KE, and GBW re: interim distribution motion.	3/15/2023	0.6	320.00	192.00	Legal - Case Administration
Geoff Winkler	Meeting with KH, KE, and JPM re: interim distribution motion.	3/15/2023	0.6	395.00	237.00	Legal - Case Administration
John Hall	Read and review Magistrate motions hearing transcript per KH suggestion. Discuss with GBW.	3/15/2023	0.9	350.00	315.00	Legal - Case Administration
Geoff Winkler	Review hearing transcript.	3/15/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Reviewing loan documentation, entity documentation and prior reports on JC commercial.	3/16/2023	2.1	320.00	672.00	Financial - Data Analysis
Josh McGraw	Creating summary for JC Commercial review and email to KH and KE.	3/16/2023	0.8	320.00	256.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to GBW re: documents reviewed pertaining to JC Commercial.	3/16/2023	0.2	320.00	64.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to PCC re: analysis of outstanding loan.	3/16/2023	0.1	320.00	32.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to KE re: JC Commercial and distribution motion.	3/16/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Operations update and reviewing outstanding tasks and AMD and JPM.	3/16/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Operations update and reviewing outstanding tasks and AMP and AMD.	3/16/2023	0.3	320.00	96.00	Legal - Case Administration
Amanda Deering	Operations update and reviewing outstanding tasks and AMP and JPM.	3/16/2023	0.3	280.00	84.00	Legal - Case Administration
John Hall	Read and review transcript of magistrate proceedings per KH request.	3/16/2023	0.9	350.00	315.00	Legal - Case Administration
John Hall	Review memo describing outstanding issues from EM and discussion with GWB.	3/16/2023	0.5	350.00	175.00	Legal - Case Administration
Geoff Winkler	Review reconciliation of ARC payments, contracts, previous notes of meetings, research docket for additional information.	3/16/2023	1.7	395.00	671.50	Legal - Case Administration
Geoff Winkler	Review report on SP and JCC, discuss with JPM, counsel.	3/16/2023	0.3	395.00	118.50	Legal - Case Administration
John Hall	Review outstanding tax items with EC from BT.	3/17/2023	0.3	350.00	105.00	Financial - Tax Issues
Geoff Winkler	Call with investor to discuss status, payments.	3/17/2023	0.3	395.00	118.50	Legal - Case Administration
John Hall	review settlement, receivers' report, loan docs and memo from JPM re: Sellers Playbook, JC Commercial, and CapSource settlement.	3/17/2023	0.7	350.00	245.00	Legal - Case Administration
Geoff Winkler	Call with borrower to discuss property status and plans moving forward.	3/20/2023	0.4	395.00	158.00	Legal - Case Administration
Josh McGraw	Email to investor re: status of their investment.	3/20/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Email to JPM and AMP re: investor communication.	3/20/2023	0.1	280.00	28.00	Legal - Case Administration
Josh McGraw	Email to KE re: distribution motion.	3/20/2023	0.1	320.00	32.00	Legal - Case Administration
Amanda Deering	Email to KH re: quarterly report litigation section summary.	3/20/2023	0.1	280.00	28.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMD, JPM, PCC and AMP.	3/20/2023	0.1	395.00	39.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMD, JPM, PCC and GBW.	3/20/2023	0.1	255.00	25.50	Legal - Case Administration
Phil Chen	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, AMD, JPM and GBW.	3/20/2023	0.1	260.00	26.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, AMD, PCC and GBW.	3/20/2023	0.1	320.00	32.00	Legal - Case Administration

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 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
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Amanda Deering	Meeting to discuss investor communication, status report and other case activities with MBB, JBH, MCC, AMP, JPM, PCC and GBW.	3/20/2023	0.1	280.00	28.00	Legal - Case Administration
Geoff Winkler	Review email from SB, email from investor, discuss with JPM, JBH.	3/20/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Reviewing an email from AMD re: investor communication.	3/20/2023	0.1	320.00	32.00	Legal - Case Administration
Maggie Chavez	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, JBH, MBB.	3/20/2023	0.1	260.00	26.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, JBH, MCC.	3/20/2023	0.1	300.00	30.00	Legal - Case Administration
John Hall	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, PCC, MBB, MCC.	3/20/2023	0.1	350.00	35.00	Legal - Case Administration
Anna Priebe	Upload 2 court filings to investor website.	3/20/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to GBW re: investor communication.	3/21/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to KE re: deal summary with details on the type of investment, outstanding balances, and estimation of value.	3/21/2023	0.4	320.00	128.00	Legal - Case Administration
Josh McGraw	Emails to investor re: receivership process, distribution timeline, and questions on prior investment with principal reduction.	3/21/2023	0.3	320.00	96.00	Legal - Case Administration
Josh McGraw	Calls with MH re: recommended data analysis tool.	3/22/2023	0.4	320.00	128.00	Financial - Data Analysis
Josh McGraw	Reviewing documents on server related to affiliated entities.	3/22/2023	1.4	320.00	448.00	Financial - Data Analysis
Josh McGraw	Reviewing entities on NV Secretary of State to verify annual report deadline.	3/22/2023	0.5	320.00	160.00	Financial - Data Analysis
Josh McGraw	Reviewing entity list identified on server image and determining if any additional entities need to be renewed.	3/22/2023	1.2	320.00	384.00	Financial - Data Analysis
Josh McGraw	Reviewing JC Commercial documents on the server image.	3/22/2023	1.2	320.00	384.00	Financial - Data Analysis
Geoff Winkler	Review additional information related to SP and JCC, discuss with JPM, counsel.	3/22/2023	0.4	395.00	158.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing Ramsey County's taxation website to determine payment deadline and ownership information.	3/22/2023	0.5	320.00	160.00	Legal - Asset Analysis and Recovery
Josh McGraw	Summary of documents reviewed to KH and KE re: JC Commercial.	3/22/2023	0.4	320.00	128.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with GBW re: entity renewals.	3/22/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Call with investor re: 5th Avenue update.	3/22/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: entity renewals.	3/22/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Call with KH re: transferring first deed of trust.	3/22/2023	0.4	320.00	128.00	Legal - Case Administration
Geoff Winkler	Call with party interested in purchasing membership interests.	3/22/2023	0.6	395.00	237.00	Legal - Case Administration
Josh McGraw	Creating a summary of entities related to open investments, current members of each entity and reasons for each entity.	3/22/2023	0.6	320.00	192.00	Legal - Case Administration
Josh McGraw	Discussion with AMP re: investor communication.	3/22/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Discussion with JPM re: investor communication.	3/22/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email communication with KH re: entity renewals and trust documents.	3/22/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Email to MH re: mounting server for analysis.	3/22/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Emails to 2 investors re: case updates.	3/22/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Operations meeting with AMD and AMP re: unlocking server and investor communication.	3/22/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Operations meeting with AMD and JPM re: unlocking server and investor communication.	3/22/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Operations meeting with AMP and JPM re: unlocking server and investor communication.	3/22/2023	0.2	280.00	56.00	Legal - Case Administration
John Hall	Review exported documents for Sleers Playbook, comparative market analysis for	3/22/2023	0.5	350.00	175.00	Legal - Case Administration
Geoff Winkler	Review minute order from court in LV litigation matter, emails with counsel KH.	3/22/2023	0.2	395.00	79.00	Legal - Case Administration
Anna Priebe	Voicemail to investor re: update on 5th Ave.	3/22/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Analyzing and reviewing documentation within CapSource server with AMD.	3/23/2023	0.7	320.00	224.00	Financial - Data Analysis
Amanda Deering	Analyzing and reviewing documentation within CapSource server with JPM.	3/23/2023	0.7	280.00	196.00	Financial - Data Analysis
Josh McGraw	Email to CE re: FM 307 distribution and payment histories.	3/23/2023	0.1	320.00	32.00	Financial - Data Analysis
Josh McGraw	Email to MH re: missing documents on server image.	3/23/2023	0.1	320.00	32.00	Financial - Data Analysis

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Reviewing corporate entity structures for outstanding loans and deal with principal reductions.	3/23/2023	1.5	320.00	480.00	Financial - Data Analysis
Josh McGraw	Reviewing documents related to Fillmore RE Partners on server image.	3/23/2023	0.7	320.00	224.00	Financial - Data Analysis
Josh McGraw	Reviewing documents related to TH and understanding loan funding.	3/23/2023	1.1	320.00	352.00	Financial - Data Analysis
Josh McGraw	Reviewing loans related to CM and communication with GBW on findings.	3/23/2023	0.6	320.00	192.00	Financial - Data Analysis
Josh McGraw	Reviewing Meadows 78 documents and principal paydown information. Comparing to	3/23/2023	1.2	320.00	384.00	Financial - Data Analysis
Josh McGraw	Call with investor re: questions on their investment and timeline for resolution.	3/23/2023	0.3	320.00	96.00	Legal - Case Administration
Geoff Winkler	Call with JPM and counsel KH to discuss entity renewal, additional information about					
Geoff Winkler	entities.	3/23/2023	1.1	395.00	434.50	Legal - Case Administration
Josh McGraw	Call with KH and GBW re: entity renewals, distribution motion, and affiliated entities.	3/23/2023	1.1	320.00	352.00	Legal - Case Administration
Geoff Winkler	Emails with JDC re hearing results.	3/23/2023	0.1	395.00	39.50	Legal - Case Administration
Josh McGraw	Reviewing loan documents and discussing loan modifications with AMD.	3/23/2023	0.8	320.00	256.00	Legal - Case Administration
Amanda Deering	Reviewing loan documents and discussing loan modifications with JPM.	3/23/2023	0.8	280.00	224.00	Legal - Case Administration
Josh McGraw	Emails with MH re: server imaging and document location.	3/24/2023	0.2	320.00	64.00	Financial - Data Analysis
Josh McGraw	Reviewing documents related CWI and CWI2 to determine the investor list.	3/24/2023	1.2	320.00	384.00	Financial - Data Analysis
Geoff Winkler	Call with counsel for third party re investment status.	3/24/2023	0.3	395.00	118.50	Legal - Case Administration
Josh McGraw	Calls with investors re: questions on Texas 156 and ARC RE. Timeline for distributions.	3/24/2023	1.2	320.00	384.00	Legal - Case Administration
Josh McGraw	Email to MBB and MCC re: SB investments.	3/24/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Emails to investors re: updates on investments and receivership process.	3/24/2023	0.5	320.00	160.00	Legal - Case Administration
Geoff Winkler	Review letter from JG re response to subpoena, discuss with counsel.	3/24/2023	0.2	395.00	79.00	Legal - Case Administration
John Hall	Review SB's investments list provided by JPM, discuss with GBW.	3/24/2023	0.3	350.00	105.00	Legal - Case Administration
Geoff Winkler	Review SOS filings on entities needing renewal.	3/24/2023	0.2	395.00	79.00	Legal - Case Administration
Geoff Winkler	Call to discuss pending litigation.	3/27/2023	0.4	395.00	158.00	Legal - Case Administration
Anna Priebe	Call with investor re: updates on ARC.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication with AMD re: investor being included on investor list.	3/27/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor questions and communication.	3/27/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor questions and communication.	3/27/2023	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: promissory notes for JC commercial and investor questions.	3/27/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Conversation with AMP re: JC Commercial investment.	3/27/2023	0.2	320.00	64.00	Legal - Case Administration
Anna Priebe	Conversation with JPM re: JC Commercial investment.	3/27/2023	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication, status report and other case activities with MBB, MCC, AMD, JPM, PCC and AMP.	3/27/2023	0.1	395.00	39.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with MBB, MCC, AMD, JPM, PCC and GBW.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication, status report and other case activities with MBB, MCC, AMP, JPM, PCC and GBW.	3/27/2023	0.1	280.00	28.00	Legal - Case Administration
Phil Chen	Meeting to discuss investor communication, status report and other case activities with MBB, MCC, AMP, AMD, JPM and GBW.	3/27/2023	0.1	260.00	26.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and other case activities with MBB, MCC, AMP, AMD, PCC and GBW.	3/27/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Research and report re: investor questions.	3/27/2023	0.4	255.00	102.00	Legal - Case Administration
John Hall	Review compiled SB investment lists and memo from JPM, research and analysis re: same. Discuss with GBW.	3/27/2023	0.9	350.00	315.00	Legal - Case Administration
Maggie Chavez	Team meeting with GBW, AMP, AMD, JPM, PCC, MBB to discuss ongoing tasks and review updates.	3/27/2023	0.1	260.00	26.00	Legal - Case Administration
Milana Barkhanoy	Team meeting with GBW, AMP, AMD, JPM, PCC, MCC to discuss ongoing tasks and review updates.	3/27/2023	0.1	300.00	30.00	Legal - Case Administration
Anna Priebe	2 investor calls re: status update on motion.	3/28/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with KE re: distribution motion and discussion of loan documentation.	3/28/2023	0.7	320.00	224.00	Legal - Case Administration

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Communication with AMD re: investor communication.	3/28/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Email to investor re: status report and how to register.	3/28/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KE re: distribution motion status.	3/28/2023	0.1	320.00	32.00	Legal - Case Administration
Geoff Winkler	Review proposed withdrawal.	3/28/2023	0.1	395.00	39.50	Legal - Case Administration
Geoff Winkler	Review updated motion for approval of interim distribution and discuss with counsel.	3/28/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Reviewing AMP emails to investors and providing feedback.	3/28/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Reviewing voicemail from an investor.	3/28/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Added new registrations from website to investor list.	3/29/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor communication.	3/29/2023	0.6	320.00	192.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor communication.	3/29/2023	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Operations meeting with AMD and AMP re: server upload, motion creation and investor updates.	3/29/2023	0.7	320.00	224.00	Legal - Case Administration
Anna Priebe	Operations meeting with AMD and JPM re: server upload, motion creation and investor updates.	3/29/2023	0.7	255.00	178.50	Legal - Case Administration
Amanda Deering	Operations meeting with AMP and JPM re: server upload, motion creation and investor updates.	3/29/2023	0.7	280.00	196.00	Legal - Case Administration
Anna Priebe	Preparation of documents for team to review.	3/29/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review and respond to email from TM.	3/29/2023	0.1	395.00	39.50	Legal - Case Administration
Geoff Winkler	Review proposed changes to motion for approval of interim distributions/sales procedures and discuss with counsel.	3/29/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Reviewing GBW's recommended changes to interim distribution.	3/29/2023	0.2	320.00	64.00	Legal - Case Administration
Josh McGraw	Reviewing the latest interim distribution draft.	3/29/2023	0.3	320.00	96.00	Legal - Case Administration
Anna Priebe	Streamlining investor communication in emails and voicemails.	3/29/2023	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Call to investor re: questions about the distribution timeline.	3/30/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Call with GBW re: confirmation statements from trust companies and investor communication.	3/30/2023	0.2	320.00	64.00	Legal - Case Administration
Geoff Winkler	Call with investor re payment timing, IRA status, questions about changes.	3/30/2023	0.3	395.00	118.50	Legal - Case Administration
Geoff Winkler	Call with JPM re: confirmation statements from trust companies and investor communication.	3/30/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor to respond to.	3/30/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor to respond to.	3/30/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: investor communication.	3/30/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to investor re: questions about distribution timeline and update from the hearing.	3/30/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Meeting with AMD re: server document intake.	3/30/2023	0.2	320.00	64.00	Legal - Case Administration
Amanda Deering	Meeting with JPM re: server document intake.	3/30/2023	0.2	280.00	56.00	Legal - Case Administration
John Hall	Review and discuss Mainstar requirements with GBW, instruct staff re: same.	3/30/2023	0.4	350.00	140.00	Legal - Case Administration
Josh McGraw	Reviewing documentation on Granada Partners.	3/31/2023	0.5	320.00	160.00	Financial - Data Analysis
Josh McGraw	Reviewing NV Secretary of State to confirm entities had been renewed.	3/31/2023	0.3	320.00	96.00	Financial - Data Analysis
Geoff Winkler	Call with JG to discuss response to subpoena.	3/31/2023	0.2	395.00	79.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: investor voicemail.	3/31/2023	0.1	320.00	32.00	Legal - Case Administration
Anna Priebe	Communication with JPM re: investor voicemail.	3/31/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to CE re: requesting documents on Granada Partners.	3/31/2023	0.1	320.00	32.00	Legal - Case Administration
Josh McGraw	Email to KH re: entity renewals and SB affiliation.	3/31/2023	0.1	320.00	32.00	Legal - Case Administration
Totals			356.9		110,026.50	

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Summary by Activity Category and Personnel						
Financial - Data Analysis	Personnel	Firm	Hours	Rate	Amount	
Financial - Data Analysis	John Hall	AFS	0.8	350.00	\$ 280.00	
Financial - Data Analysis	Josh McGraw	AFS	49.5	320.00	\$ 15,840.00	
Financial - Data Analysis	Amanda Deering	AFS	0.7	280.00	\$ 196.00	
Financial - Data Analysis	Maggie Chavez	AFS	49.5	260.00	\$ 12,870.00	
Financial - Data Analysis	Anna Priebe	AFS	0.7	255.00	\$ 178.50	
			<u>101.2</u>		<u>\$ 29,364.50</u>	
Financial - Forensic Accounting	Personnel	Firm	Hours	Rate	Amount	
Financial - Forensic Accounting	Josh McGraw	AFS	0.2	320.00	\$ 64.00	
Financial - Forensic Accounting	Amanda Deering	AFS	0.2	280.00	\$ 56.00	
Financial - Forensic Accounting	Maggie Chavez	AFS	0.2	260.00	\$ 52.00	
Financial - Forensic Accounting	Anna Priebe	AFS	0.2	255.00	\$ 51.00	
			<u>0.8</u>		<u>\$ 223.00</u>	
Financial - Status Reports	Personnel	Firm	Hours	Rate	Amount	
Financial - Status Reports	Geoff Winkler	AFS	0.2	395.00	\$ 79.00	
Financial - Status Reports	John Hall	AFS	3.0	350.00	\$ 1,050.00	
Financial - Status Reports	Josh McGraw	AFS	8.2	320.00	\$ 2,624.00	
Financial - Status Reports	Amanda Deering	AFS	1.2	280.00	\$ 336.00	
Financial - Status Reports	Maggie Chavez	AFS	8.2	260.00	\$ 2,132.00	
Financial - Status Reports	Anna Priebe	AFS	1.2	255.00	\$ 306.00	
Financial - Status Reports	Phil Chen	AFS	0.0	260.00	\$ -	
			<u>22.0</u>		<u>\$ 6,527.00</u>	
Financial - Tax Issues	Personnel	Firm	Hours	Rate	Amount	
Financial - Tax Issues	Geoff Winkler	AFS	0.2	395.00	\$ 79.00	
Financial - Tax Issues	John Hall	AFS	2.9	350.00	\$ 1,015.00	
Financial - Tax Issues	Josh McGraw	AFS	0.1	320.00	\$ 32.00	
Financial - Tax Issues	Maggie Chavez	AFS	0.1	260.00	\$ 26.00	
			<u>3.3</u>		<u>\$ 1,152.00</u>	
Legal - Asset Analysis and Recovery	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Analysis and Recovery	Geoff Winkler	AFS	3.7	395.00	\$ 1,461.50	
Legal - Asset Analysis and Recovery	John Hall	AFS	0.5	350.00	\$ 175.00	
Legal - Asset Analysis and Recovery	Josh McGraw	AFS	11.8	320.00	\$ 3,776.00	
Legal - Asset Analysis and Recovery	Amanda Deering	AFS	0.9	280.00	\$ 252.00	
Legal - Asset Analysis and Recovery	Maggie Chavez	AFS	11.8	260.00	\$ 3,068.00	
Legal - Asset Analysis and Recovery	Anna Priebe	AFS	0.9	255.00	\$ 229.50	
Legal - Asset Analysis and Recovery	Phil Chen	AFS	0.8	260.00	\$ 208.00	
			<u>29.6</u>		<u>\$ 9,170.00</u>	
Legal - Asset Disposition	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Disposition	Geoff Winkler	AFS	0.5	395.00	\$ 197.50	
Legal - Asset Disposition	Josh McGraw	AFS	1.3	320.00	\$ 416.00	
Legal - Asset Disposition	Maggie Chavez	AFS	1.3	260.00	\$ 338.00	
Legal - Asset Disposition	Phil Chen	AFS	0.4	260.00	\$ 104.00	

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Fees of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
			3.1		\$ 1,055.50	
Legal - Case Administration	Personnel	Firm	Hours	Rate	Amount	
Legal - Case Administration	Geoff Winkler	AFS	39.5	395.00	\$ 15,602.50	
Legal - Case Administration	John Hall	AFS	17.7	350.00	\$ 6,195.00	
Legal - Case Administration	Milana Barkhanoy	AFS	6.5	300.00	\$ 1,950.00	
Legal - Case Administration	Josh McGraw	AFS	74.2	320.00	\$ 23,744.00	
Legal - Case Administration	Amanda Deering	AFS	24.4	280.00	\$ 6,832.00	
Legal - Case Administration	Maggie Chavez	AFS	8.7	260.00	\$ 2,262.00	
Legal - Case Administration	Anna Priebe	AFS	77.3	255.00	\$ 19,711.50	
Legal - Case Administration	Phil Chen	AFS	1.2	260.00	\$ 312.00	
			248.3		\$ 76,609.00	

Overall Summary						
Totals	Personnel	Firm	Hours	Rate	Amount	
	Geoff Winkler	AFS	44.1	395.00	\$ 17,419.50	
	John Hall	AFS	24.9	350.00	\$ 8,715.00	
	Milana Barkhanoy	AFS	6.5	300.00	\$ 1,950.00	
	Josh McGraw	AFS	145.3	320.00	\$ 46,496.00	
	Amanda Deering	AFS	27.4	280.00	\$ 7,672.00	
	Maggie Chavez	AFS	9.9	260.00	\$ 2,574.00	
	Anna Priebe	AFS	97.6	255.00	\$ 24,888.00	
	Phil Chen	AFS	1.2	260.00	\$ 312.00	
			356.9		\$ 110,026.50	
	TOTAL FEES		356.9		\$ 110,026.50	

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
Summary of Expenses of Receiver and Retained Personnel
January 1, 2023 - March 31, 2023

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
John Hall	Extra Space Storage	Storage rent prorations	01/02/23	319.62	Document and Asset Storage
John Hall	Alaska Airlines	Airfare 1/17-1/20	01/04/23	100.61	Airfare
Geoff Winkler	Alaska Airlines	Airfare 1/17-1/20	01/04/23	489.30	Airfare
Geoff Winkler	Alaska Airlines	Airfare 1/17-1/20 (AMP)	01/04/23	100.61	Airfare
Milana Barkhanoy	Alaska Airlines	Airfare 1/17-1/20	01/04/23	100.61	Airfare
Anna Priebe	Alaska Airlines	Alaska Air Airfare Flight change AMP	01/06/23	60.00	Airfare
John Hall	AFS	Admin Meals Per Diem	01/17/23	51.75	Per Diem Meals
Anna Priebe	AFS	Admin Meals Per Diem	01/17/23	51.75	Per Diem Meals
Geoff Winkler	FedEx	FedEx Courier	01/17/23	604.43	Courier/Shipping/Freight
Geoff Winkler	AFS	Admin Meals Per Diem	01/17/23	51.75	Per Diem Meals
Milana Barkhanoy	AFS	Admin Meals Per Diem	01/17/23	51.75	Per Diem Meals
Milana Barkhanoy	Uber	Uber:Taxi	01/17/23	5.32	Automotive Expense
Milana Barkhanoy	Uber	Uber:Taxi	01/17/23	35.50	Automotive Expense
John Hall	AFS	Admin Meals Per Diem	01/18/23	69.00	Per Diem Meals
Anna Priebe	AFS	Admin Meals Per Diem	01/18/23	69.00	Per Diem Meals
Milana Barkhanoy	AFS	Admin Meals Per Diem	01/18/23	69.00	Per Diem Meals
Geoff Winkler	AFS	Admin Meals Per Diem	01/18/23	69.00	Per Diem Meals
John Hall	AFS	Admin Meals Per Diem	01/19/23	69.00	Per Diem Meals
Anna Priebe	AFS	Admin Meals Per Diem	01/19/23	51.75	Per Diem Meals
Josh McGraw	Alaska Airlines	Alaska Airlines - Airfare for 2/14-2/16 trip.	01/19/23	287.80	Airfare
Anna Priebe	The Cosmopolitan Las Vegas	Hotel for AMP for 2 nights, 1/17/23-1/19/23.	01/19/23	766.44	Hotel
Milana Barkhanoy	AFS	Admin Meals Per Diem	01/19/23	69.00	Per Diem Meals
Geoff Winkler	AFS	Admin Meals Per Diem	01/19/23	69.00	Per Diem Meals
Amanda Deering	GoDaddy	GoDaddy - Website Software	01/19/23	17.97	Internet/Online Fees
John Hall	AFS	Admin Meals Per Diem	01/20/23	51.75	Per Diem Meals
John Hall	ARCO	ARCO gas for rental car 20230117-0120 JBH	01/20/23	10.29	Automotive Expense
John Hall	National Rental Car	MBB GBW AMP	01/20/23	361.22	Automotive Expense
John Hall	The Cosmopolitan Las Vegas	Hotel JBH 3 nights, COSMO	01/20/23	1,215.61	Hotel
John Hall	The Cosmopolitan Las Vegas	Hotel MBB 3 nights, COSMO	01/20/23	1,038.55	Hotel
Milana Barkhanoy	AFS	Admin Meals Per Diem	01/20/23	51.75	Per Diem Meals
Milana Barkhanoy	AFS	Admin Meals Per Diem	01/20/23	51.75	Per Diem Meals
Geoff Winkler	AFS	Admin Meals Per Diem	01/20/23	51.75	Per Diem Meals
John Hall	Port of Portland Parking	Parking at PDX MBB JBH 1/17-1/20 trip to LVNV	01/21/23	93.00	Automotive Expense
Maggie Chavez	Alaska Airlines	Airfare for 2/14-2/16	01/25/23	287.80	Airfare
Geoff Winkler	FedEx	FedEx - Delivery services	01/27/23	282.87	Courier/Shipping/Freight

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
 Summary of Expenses of Receiver and Retained Personnel
 January 1, 2023 - March 31, 2023

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Geoff Winkler	Alaska Airlines	Alaska Airlines * Airfare	01/30/23	381.79	Airfare
		FedEx - Delivery			
Geoff Winkler	FedEx	services	01/30/23	23.25	Courier/Shipping/Freight
John Hall	Extra Space Storage	Storage rent prorations	02/01/23	319.62	Document and Asset Storage
Maggie Chavez	AFS	Admin Meals Per Diem	02/14/23	51.75	Per Diem Meals
Josh McGraw	AFS	Admin Meals Per Diem	02/14/23	51.75	Per Diem Meals
		Uber Postmates -			
Anna Priebe	Uber Postmates	Delivery services	02/14/23	127.66	Courier/Shipping/Freight
Maggie Chavez	AFS	Admin Meals Per Diem	02/15/23	69.00	Per Diem Meals
Josh McGraw	AFS	Admin Meals Per Diem	02/15/23	69.00	Per Diem Meals
		Port of Portland -			
Maggie Chavez	Port of Portland Parking	Parking (3 days)	02/16/23	72.00	Automotive Expense
		Port of Portland *			
		Automotive Expense *			
Josh McGraw	Port of Portland Parking	Parking (3 days)	02/16/23	72.00	Automotive Expense
		Marriott - Hotel (2			
Maggie Chavez	Marriott	nights)	02/16/23	708.62	Hotel
		Marriott * Hotel (2			
Josh McGraw	Marriott	nights)	02/16/23	708.62	Hotel
Maggie Chavez	AFS	Admin Meals Per Diem	02/16/23	51.75	Per Diem Meals
Josh McGraw	AFS	Admin Meals Per Diem	02/16/23	51.75	Per Diem Meals
John Hall	Extra Space Storage	Storage rent prorations	03/01/23	319.62	Document and Asset Storage
		FedEx - Delivery			
Geoff Winkler	FedEx	services	03/06/23	3,586.66	Courier/Shipping/Freight
		FedEx - Delivery			
Geoff Winkler	FedEx	services	03/06/23	23.20	Courier/Shipping/Freight
Total				13,762.59	

	Geoff Winkler	John Hall	Josh McGraw	Milana Barkhanoy	Amanda Deering	Maggie Chavez	Anna Priebe	Total
Airfare	971.70	100.61	287.80	100.61	-	287.80	60.00	1,808.52
Automotive Expense	-	464.51	72.00	40.82	-	72.00	-	649.33
Courier/Shipping/Freight	4,520.41	-	-	-	-	-	127.66	4,648.07
Document and Asset Storage	-	958.86	-	-	-	-	-	958.86
Hotel	-	1,215.61	708.62	1,038.55	-	708.62	766.44	4,437.84
Internet/Online Fees	-	-	-	-	17.97	-	-	17.97
Per Diem Meals	241.50	241.50	172.50	241.50	-	172.50	172.50	1,242.00
Total	5,733.61	2,981.09	1,240.92	1,421.48	17.97	1,240.92	1,126.60	13,762.59

SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
Receivership Estate Balance Sheet
January 1, 2023 - March 31, 2023

Attachment 3

Assets:		Liabilities:	
Cash	\$ 1,327,163	State/Federal Taxes ⁴	\$ -
Loan Receivable	\$ -	Property Taxes ⁴	\$ -
Marketable Securities	\$ -	Admin Holdback ¹	\$ 75,356
Real Property ¹	\$ 15,693,611	Total Liabilities	\$ 75,356
Personal Property ¹	\$ -		
Private Equity Investments ¹	\$ -	Claims:1	
Existing Litigation ^{2,3}	\$ -	Investors ⁵	\$ -
Third Party Litigation ^{2,3}	\$ -	Creditors ⁵	\$ -
Professional Liability Litigation ^{2,3}	\$ -	Total Claims	\$ -
Total Assets	\$ 17,020,774	Total Liabilities plus Claims	\$ 75,356

-
1. Estimated value that is subject to further revision.
 2. Probability of successful recovery unknown.
 3. Value based on discounted present value and is under evaluation.
 4. There is no known tax liability, but the Receiver is reviewing.
 5. The total amount of investor and creditor claims is still under review.

**SEC v. CapSource Inc., Stephen J. Byrne, and Gregory P. Herlean
Receiver's Cash Receipts and Disbursements
January 1, 2023 - March 31, 2023**

Attachment 4

Beginning Balance of Cash in Receivership Estate on January 1, 2023	\$ 1,352,472.12
Deposits:	\$ 182,999.96
Payments:	\$ (208,308.93)
Ending Balance of Cash in Receivership Estate on March 31, 2023	<u>\$ 1,327,163.15</u>

EXHIBIT B

EXHIBIT B

Allen Matkins Leck Gamble Mallory & Natsis LLP
Invoices

Allen Matkins

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
 ATTORNEYS AT LAW

600 WEST BROADWAY, 27th FLOOR
 SAN DIEGO, CALIFORNIA 92101-0903
 TELEPHONE (619) 233-1155 FACSIMILE (619) 233-1158
 WWW.ALLENMATKINS.COM
 FEDERAL TAX I.D. 95-3605309

SUMMARY OF ALL MATTERS

JANUARY 5, 2023
 INVOICE # 810064
 ATTY: EDWARD (TED) FATES

WINKLER, GEOFF - CRO FOR CAPSOURCE, INC.
 GEOFF WINKLER
 RECEIVER
 AMERICAN FIDUCIARY SERVICES LLC
 715 NW HOYT STREET, SUITE 4364
 PORTLAND, OR 97208

<u>MATTER #</u>	<u>MATTER NAME</u>	<u>FEES</u>	<u>DISBURSEMENTS</u>	<u>TOTAL</u>
391879.00002	GENERAL RECEIVERSHIP	6,695.25	0.00	6,695.25
391879.00003	ASSET RECOVERY & MANAGEMENT	67.50	0.00	67.50
391879.00007	PENDING LITIGATION	1,510.85	0.00	1,510.85
	TOTAL THIS BILLING PERIOD	8,273.60	0.00	\$8,273.60
	OUTSTANDING BALANCE DUE:			\$707.85
	TOTAL DUE:			\$8,981.45

IF YOU DESIRE TO PAY BY WIRE PLEASE REFERENCE INVOICE NUMBER 810064 OR CLIENT NUMBER 391879

*** NOTE NEW WIRE INSTRUCTIONS:***

Allen Matkins Leck Gamble Mallory & Natsis LLP
 City National Bank
 2029 Century Park East, Suite 100
 Los Angeles CA 90067

ABA/ACH Routing Number: 122016066
 Swift Code: CINAUS6L (for international wire transfer only)
 Account Number: 210726284
 Email Remittance: Payments@AllenMatkins.com

*** NOTE NEW PAY BY CHECK INSTRUCTIONS ***

Payments by Check – Via US Mail: Allen Matkins LLP, File 2367, 1801 W. Olympic Blvd., Pasadena, CA 91199-2367

Payments by Check – Via Overnight Delivery: Allen Matkins LLP, ATTN: Lockbox Services, File 2367, 1801 W. Olympic Blvd., Fourth Floor, Los Angeles, CA 90006-3701

BILLS ARE DUE AND PAYABLE UPON RECEIPT

Allen Matkins

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
ATTORNEYS AT LAW

600 WEST BROADWAY, 27th FLOOR
SAN DIEGO, CALIFORNIA 92101-0903
TELEPHONE (619) 233-1155 FACSIMILE (619) 233-1158
WWW.ALLENMATKINS.COM
FEDERAL TAX I.D. 95-3605309

WINKLER, GEOFF - CRO FOR CAPSOURCE, INC. **RE: GENERAL RECEIVERSHIP** JANUARY 5, 2023
MATTER # 391879.00002

INVOICE # **810064.00002**
ATTY: EDWARD (TED) FATES

MATTER # 391879.00002 – GENERAL RECEIVERSHIP

<u>DATE</u>	<u>DESCRIPTION OF SERVICES RENDERED</u>	<u>NAME</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/21	REVIEW SEC COMPLAINTS, JUDGMENTS, AND ASSOCIATED MATERIALS AND CONFER WITH CRO REGARDING CASE ADMINISTRATION ISSUES (2.1); REVIEW AND REVISE PROPOSED REVISIONS TO NDA AND DELIVER TO CRO FOR REVIEW AND CONSIDERATION (0.8); EMAILS WITH CRO REGARDING SAME (0.2).	DEL CASTILLO	3.10	2,216.50
09/24/21	TELECONFERENCE WITH CRO REGARDING FUNDING AND POTENTIAL CONVERSION TO RECEIVERSHIP; REVIEW ASSOCIATED DOCUMENTS (0.2).	DEL CASTILLO	0.20	143.00
10/11/21	REVIEW AND PREPARE COMMENTS REGARDING ARC TOLLING AGREEMENT (0.6).	DEL CASTILLO	0.60	386.10
11/15/21	REVIEW DOCKETS AND PREPARE CASE ADMINISTRATION INQUIRY TO CRO (0.3).	DEL CASTILLO	0.30	193.05
11/19/21	EMAILS AND TELECONFERENCE WITH CRO REGARDING STATUS OF CASE AND PAYROLL ISSUE PRESENTED IN CONNECTION WITH ALLOCATION OF PAY ACROSS EMPLOYEES WORKING FOR CAPSOURCE AND AFFILILATE (0.5); REVIEW DOCUMENTS TRANSMITTED AS CRO (0.4).	DEL CASTILLO	0.90	579.15
12/08/21	REVIEW AND RESPOND TO INQUIRY FROM CRO REGARDING CEASE AND DESIST REQUEST; BRIEF ANALYSIS OF SAME (0.3).	DEL CASTILLO	0.30	193.05

WINKLER, GEOFF - CRO FOR
CAPSOURCE, INC.

JANUARY 5, 2023

INVOICE # **810064**
ATTY: EDWARD (TED) FATES

MATTER # 391879.00002 – GENERAL RECEIVERSHIP

<u>DATE</u>	<u>DESCRIPTION OF SERVICES RENDERED</u>	<u>NAME</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/10/21	REVIEW AND REVISE TRUST AMENDMENT AND EMAILS WITH CRO REGARDING SAME (0.6).	DEL CASTILLO	0.60	386.10
12/11/21	ANALYSIS OF ISSUES ASSOCIATED WITH TRUST AMENDMENT (0.6).	DEL CASTILLO	0.60	386.10
12/27/21	REVIEW CASE DOCKET AND ATTENTION TO PROSPECTIVE POST-RECEIVERSHIP ADMINISTRATIVE MATTERS (0.4).	DEL CASTILLO	0.40	257.40
01/24/22	REVIEW NOTES AND DOCKET AND ATTENTION TO CASE ADMINISTRATION MATTERS (0.3).	DEL CASTILLO	0.30	193.05
02/03/22	REVIEW DOCUMENTS AND PREPARE DEMAND LETTER TO STORE FUNDING REGARDING LEASE SECURITY DEPOSIT (1.2); CONFER WITH RECEIVER REGARDING SAME AND PREPARE CORRESPONDENCE FOR TRANSMITTAL (0.3).	DEL CASTILLO	1.50	965.25
03/02/22	REVIEW AND RESPOND TO INQUIRY FROM ATTORNEY J. PECK REGARDING STORE LEASE DEPOSIT LETTER (0.3).	DEL CASTILLO	0.30	193.05
03/29/22	REVIEW NOTES AND EMAILS, AND VOICEMAIL TO ATTORNEY J. PECK REGARDING DEMAND LETTER TO STOR (0.3).	DEL CASTILLO	0.30	193.05
07/08/22	REVIEW AND ANALYZE PROPOSED RECEIVERSHIP ORDER	FATES	0.40	275.40
07/18/22	RESEARCH AND FORWARD LATEST FILINGS FROM RECEIVERSHIP CASE.	KAUP	0.40	135.00

TOTAL FEES	\$6,695.25
TOTAL THIS BILLING PERIOD:	\$6,695.25
OUTSTANDING BALANCE DUE THIS MATTER:	\$707.85
TOTAL DUE THIS MATTER:	\$7,403.10

Allen Matkins

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
ATTORNEYS AT LAW

600 WEST BROADWAY, 27th FLOOR
SAN DIEGO, CALIFORNIA 92101-0903
TELEPHONE (619) 233-1155 FACSIMILE (619) 233-1158
WWW.ALLENMATKINS.COM
FEDERAL TAX I.D. 95-3605309

**WINKLER, GEOFF - CRO FOR
CAPSOURCE, INC.**
MATTER # 391879.00003

**RE: ASSET RECOVERY &
MANAGEMENT**

JANUARY 5, 2023

INVOICE # **810064.00003**
ATTY: EDWARD (TED) FATES

MATTER # 391879.00003 – ASSET RECOVERY & MANAGEMENT

<u>DATE</u>	<u>DESCRIPTION OF SERVICES RENDERED</u>	<u>NAME</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/11/22	TELEPHONE CALL WITH MR. DEL CASTILLO AND SEARCH FOR CERTIFIED COPIES OF RECEIVERSHIP ORDER.	KAUP	0.20	67.50

TOTAL FEES	\$67.50
TOTAL THIS BILLING PERIOD:	\$67.50
OUTSTANDING BALANCE DUE THIS MATTER:	\$0.00
TOTAL DUE THIS MATTER:	\$67.50

Allen Matkins

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 ATTORNEYS AT LAW

600 WEST BROADWAY, 27th FLOOR
 SAN DIEGO, CALIFORNIA 92101-0903
 TELEPHONE (619) 233-1155 FACSIMILE (619) 233-1158
 WWW.ALLENMATKINS.COM
 FEDERAL TAX I.D. 95-3605309

WINKLER, GEOFF - CRO FOR CAPSOURCE, INC.
 RE: **PENDING LITIGATION**
 MATTER # 391879.00007

JANUARY 5, 2023

INVOICE # **810064.00007**
 ATTY: EDWARD (TED) FATES

MATTER # 391879.00007 – PENDING LITIGATION

<u>DATE</u>	<u>DESCRIPTION OF SERVICES RENDERED</u>	<u>NAME</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/22/21	ANALYZE ISSUES REGARDING PRODUCTION OF CONFIDENTIAL FINANCIAL INFORMATION BY ARC TO CRO, REVISE DRAFT NON-DISCLOSURE AGREEMENT REGARDING SAME (0.5).	FATES	0.50	357.50
10/19/21	REVIEW EMAILS AND PROPOSED REVISION TO TOLLING AGREEMENT AND CONFER WITH CRO REGARDING SAME (0.2).	DEL CASTILLO	0.20	128.70
07/08/22	RESEARCH AND FORWARD INFORMATION ON LAWSUIT IN LAS VEGAS DISTRICT COURT; REVIEW AND RESPOND TO EMAILS AND ATTEMPT TO OBTAIN PLEADINGS.	KAUP	0.60	202.50
07/08/22	REVIEW AND ANALYZE INFORMATION RELATING TO ARC RE AND PENDING LITIGATION IN NEVADA STATE COURT AGAINST AMERICAS REHAB CAMPUSES	FATES	0.90	619.65
07/11/22	FOLLOW UP ON PLEADINGS FROM ARE LITIGATION IN CLARK COUNTY AND OBTAIN PLEADING FROM LOCAL COUNSEL.	KAUP	0.60	202.50

TOTAL FEES	\$1,510.85
TOTAL THIS BILLING PERIOD:	\$1,510.85
OUTSTANDING BALANCE DUE THIS MATTER:	\$0.00

TOTAL DUE THIS MATTER:

\$1,510.85

WINKLER, GEOFF - CRO FOR
CAPSOURCE, INC.
CLIENT # 391879

JANUARY 5, 2023

INVOICE # **810064**
ATTY: EDWARD (TED) FATES

TOTAL THIS BILLING PERIOD ALL MATTERS:	\$ <u>8,273.60</u>
OUTSTANDING BALANCE DUE ALL MATTERS:	707.85
TOTAL DUE ALL MATTERS:	\$ <u>8,981.45</u>

Allen Matkins

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
ATTORNEYS AT LAW

600 WEST BROADWAY, 27th FLOOR
SAN DIEGO, CALIFORNIA 92101-0903
TELEPHONE (619) 233-1155 FACSIMILE (619) 233-1158
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FEDERAL TAX I.D. 95-3605309

WINKLER, GEOFF - CRO FOR CAPSOURCE, INC.
GEOFF WINKLER
RECEIVER
AMERICAN FIDUCIARY SERVICES LLC
715 NW HOYT STREET, SUITE 4364
PORTLAND, OR 97208

CLIENT: 391879

INVOICE: 810064

REMITTANCE COPY

TOTAL FEES FOR PROFESSIONAL SERVICES RENDERED THROUGH DECEMBER 31, 2022	\$8,273.60
TOTAL DISBURSEMENTS MADE TO YOUR ACCOUNT THROUGH DECEMBER 31, 2022	\$0.00
TOTAL DUE THIS BILLING PERIOD:	\$8,273.60
OUTSTANDING BALANCE DUE ALL MATTERS:	\$707.85
TOTAL DUE ALL MATTERS:	\$8,981.45

IF YOU DESIRE TO PAY BY WIRE PLEASE REFERENCE INVOICE NUMBER 810064 OR CLIENT NUMBER 391879

***** NOTE NEW WIRE INSTRUCTIONS:*****

Allen Matkins Leck Gamble Mallory & Natsis LLP
City National Bank
2029 Century Park East, Suite 100
Los Angeles CA 90067

ABA/ACH Routing Number: 122016066
Swift Code: CINAUS6L (for international wire transfer only)
Account Number: 210726284
Email Remittance: Payments@AllenMatkins.com

***** NOTE NEW PAY BY CHECK INSTRUCTIONS *****

Payments by Check – Via US Mail: Allen Matkins LLP, File 2367, 1801 W. Olympic Blvd., Pasadena, CA 91199-2367

Payments by Check – Via Overnight Delivery: Allen Matkins LLP, ATTN: Lockbox Services, File 2367, 1801 W. Olympic Blvd., Fourth Floor, Los Angeles, CA 90006-3701

BILLS ARE DUE AND PAYABLE UPON RECEIPT

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 KYLE A. EWING, Bar No 14051
ewingk@gtlaw.com
3 CHRISTIAN T. SPAULDING, Bar No. 14277
spauldingc@gtlaw.com
4 **GREENBERG TRAURIG, LLP**
5 10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
6 Telephone: (702) 792-3773
7 Facsimile: (702) 792-9002

8 *Attorneys for Receiver Geoff Winkler*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 vs.

15 CAPSOURCE, INC., *et al.*

16 Defendants.

Case No. 2:20-CV-02303-RFB-DJA

**DECLARATION OF KARA B.
HENDRICKS IN SUPPORT OF THIRD
QUARTERLY APPLICATION FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES
OF RECEIVER AND RECEIVER'S
COUNSEL GREENBERG TRAURIG
FOR PERIOD JANUARY 1, 2023-
MARCH 31, 2023**

18 I, Kara B. Hendricks, hereby declare as follows:

19 1. I am a duly licensed attorney, authorized to practice law in the state of Nevada.
20 I am a shareholder with the law firm of Greenberg Traurig, LLP, ("GT") and counsel for Geoff
21 Winkler, the Court-appointed Receiver (the "Receiver") in the above captioned matter.

22 2. I make this declaration in support of the Receiver's application for approval of
23 his fees and costs and those of his professional in connection with the above captioned matter.

24 3. This declaration is based on my personal knowledge, except where made on
25 information and belief, and as to those matters, I believe them to be true.

26 4. The Receiver proposed retaining GT in this matter in September 2022 due to the
27 firm's litigation experience, receivership experience, and strong Nevada base.

28 ///

1 5. Attached to this declaration as **Exhibit A** is a true and correct copy of the invoice
2 for the services of my firm for the period from January 1, 2023, through March 31, 2023 (the
3 “Application Period”).

4 6. In the ordinary course of Greenberg Traurig’s business, we keep a record of all
5 time expended by our professionals in the rendering of professional services on a computerized
6 billing system.

7 7. At or near the time the professional services are rendered, professionals of the
8 firm record (a) the description of the nature of the services performed, (b) the duration of the
9 time expended, and (c) the client/matter name or number by either: (1) writing such information
10 on a time sheet, or (2) inputting such information directly into the firm's computer billing
11 system.

12 8. For the professionals who record their time using written time sheets, the
13 information contained in the time sheets is transcribed into the firm’s computer billing system.

14 9. The firm’s computer billing system keeps a record of all time spent on a
15 client/matter, the professional providing the services, and a description of the services rendered.
16 The firm’s computer billing system automatically multiplies the time expended by each
17 professional by the respective professional's billing rate to calculate the amount of the fee. The
18 firm conducts its business in reliance on the accuracy of such business records

19 10. As reflected in the attached invoice, and pursuant to the Receivership Order
20 (ECF No. 17) and the Order Authorizing Employment of Counsel (ECF No. 20), professionals
21 at GT Traurig assisted the Receiver as follows during the Application Period: taking the lead
22 on communications with counsel and third parties, identifying and evaluating ancillary
23 proceedings, assisting in the review of documents relating to real estate transactions, evaluate
24 interim distribution options and preparation of motion to further same; preparation of quarterly
25 reports and court filings; communication with SEC regarding pending matters; and review and
26 analysis of issues as requested by the Receiver.

27 ///

28 ///

1 11. GT endeavored to staff each task efficiently, using a core team of attorneys and
2 utilizing associates and paralegal assistance where appropriate. Additionally, Greenberg
3 Traurig agreed to discount its standard billing rates for this matter by 15%.

4 12. I hereby certify that I have read the Third Quarterly Application for Payment of
5 Fees and Reimbursement of Expenses of Receiver and Receiver's Counsel for the period ending
6 March 31, 2023 to which this declaration will be attached.

7 13. To the best of my knowledge, information and belief formed after reasonable
8 inquiry, the Application and all fees and expenses therein are true and accurate and comply with
9 the Billing Instructions for Receivers in Civil Actions commenced by the U.S. Securities and
10 Exchange Commission.

11 14. In seeking reimbursement for a service which GT justifiably purchased or
12 contracted for from a third party (such as copying, imaging, bulk mail, messenger service,
13 overnight courier, computerized research, or title and lien searches), GT requests
14 reimbursement only for the amount billed to GT by the third-party vendor and paid by GT to
15 such vendor. If such services are performed by the Receiver or the Receiver's retained
16 personnel, the Receiver or the retained personnel, as appropriate, will certify that it is not
17 making a profit on such reimbursable service.

18 I declare under penalty of perjury under the laws of the State of Nevada that the
19 foregoing is true and correct.

20 Executed on May 12, 2023.

21 */s/ Kara B. Hendricks*
22 KARA B. HENDRICKS, ESQ.
23 Declarant
24
25
26
27
28

EXHIBIT A

EXHIBIT A

GT Invoices for Services
(January 2023 through March 2023)



Invoice No.: 1000221361
 File No. : 209375.010300
 Bill Date : February 10, 2023

Geoff Winkler
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

INVOICE

Re: SEC v. Capsource (Geoff Winkler, Receiver)

Legal Services through January 31, 2023:

	Total Fees:	\$	6,098.43
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Expenses:

Exhibits	716.75		
Other Charges	216.75		
	Total Expenses:	\$	933.50

	Current Invoice:	\$	7,031.93
--	-------------------------	-----------	-----------------

	Previous Balance (see attached statement):	\$	49,073.41
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	Total Amount Due:	\$	56,105.34
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KBH:LC
 Tax ID: 13-3613083



Invoice No.: 1000221361
File No. : 209375.010300

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010300
INVOICE NUMBER: 1000221361*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	7,031.93
Previous Balance:	\$	49,073.41
Total Amount Due:	\$	56,105.34

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA# 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010300
INVOICE NUMBER: 1000221361*
BILLING
PROFESSIONAL: Kara B. Hendricks

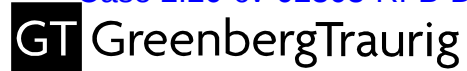
IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000221361
File No. : 209375.010300

Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000221361
File No. : 209375.010300

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
10/11/22	1000127101	11,901.11	1,701.00	0.00	13,602.11
01/09/23	1000192221	9,798.96	0.00	0.00	9,798.96
01/30/23	1000207640	11,388.26	9.00	0.00	11,397.26
01/30/23	1000207944	14,189.08	86.00	0.00	14,275.08
	Totals:	\$ 47,277.41	\$ 1,796.00	\$ 0.00	\$ 49,073.41

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	Kara B. Hendricks	Review emails from S. Byrne; Follow-up with J. Holpuch regarding server imaging;	0.10	48.03
01/04/23	Kyle Ewing	Email communication with G. Winkler and K. Hendricks re: completion of CapSource server imaging by Holo; follow up with J. Holpuch at Holo	0.30	102.00
01/04/23	Kara B. Hendricks	Review 5th Ave. management demand letter and pull information from Secretary of State (.2); Discuss issues with J. McGraw (.1); Forward demand letter to S. Scow Resident Agent of 5th Avenue (.1);	0.40	192.10
01/05/23	Kyle Ewing	Follow-up email communication with Holo eDiscovery (M. Holpuch) and G. Winkler re: hard drive containing image of CapSource server	0.20	68.00
01/05/23	Kara B. Hendricks	Telephone call from T. Miller regarding case status and enforcement issues (.3); Follow-up telephone call with G. Winkler and do initial research regarding Fair Fund options (.4); Provide email update to T. Miller (.1);	0.80	384.20
01/06/23	Kyle Ewing	Conference with K. Hendricks re: status of various receivership items, including defendants' failure to pay stipulated fines, ARC RE negotiations, and eventual plan for distributions	0.10	34.00
01/06/23	Kyle Ewing	Follow-up communication with G. Winkler and M. Holpuch (Holo) re: hard drive copy of image of CapSource server	0.10	34.00
01/06/23	Kara B. Hendricks	Review revised stipulation and respond to email to CAC attorneys regarding same;	0.10	48.03
01/09/23	Kara B. Hendricks	Review updated litigation summary and correspond with A. Deering regarding same;	0.10	48.03
01/11/23	Kara B. Hendricks	Review emails regarding tax reporting and correspond with M. Barkhanoy and receiver team regarding motion to employ;	0.10	48.03
01/12/23	Kara B. Hendricks	Correspond with T. Miller and G. Winkler regarding Zipprich matters;	0.10	47.97
01/13/23	Kara B. Hendricks	Attention to email from D. Koch regarding CAC stipulation; Make additional revisions to stipulation and send to T. Miller for review and comment (.6); Incorporate T. Miller comments and recirculate stipulation for signature (.3);	0.90	432.23
01/17/23	Kara B. Hendricks	Review emails regarding CAC stipulation; Follow-up regarding hard-drive;	0.10	48.03

01/19/23	Kara B. Hendricks	Follow-up with K. Ewing regarding information needed for distributions motion and updates in ancillary proceedings;	0.30	144.08
01/23/23	Kyle Ewing	Email communication with T. Bennett (counsel for Entrust) re: status of stipulation and order submitted in receivership court to compromise state court case pending against CapSource; confer with K. Hendricks re: the same	0.40	136.00
01/23/23	Kara B. Hendricks	Discuss property sale and distribution issues with J. McGraw and follow-up with K. Ewing regarding draft motion relating to same;	0.40	192.10
01/24/23	Kara B. Hendricks	Attention to emails from S. Scow and request C. Ney's assistance with initial review of new documents provided and follow-up with G. Winkler regarding same;	0.20	96.05
01/24/23	Kara B. Hendricks	Review emails from counsel in CAC matter and revised stipulation and respond to same;	0.20	96.05
01/25/23	Kyle Ewing	Telephonic communication with chambers for magistrate judge (voicemail)	0.10	34.00
01/25/23	Kyle Ewing	Draft, review, and revise notices of non-opposition to the receiver's (a) application for fees and expenses; (b) petition for further instructions; and (c) joining motion re: Entrust ancillary proceeding; confer with K. Hendricks and email communication with AFS re: the same; review pending motions and research law in connection with the same; finalize document in preparation for filing	3.50	1,190.00
01/25/23	Kara B. Hendricks	Review and respond to emails regarding CAC trial and stipulation;	0.10	48.03
01/25/23	Cynthia L. Ney	Analysis, download and electronic organization of materials forwarded by King Scow firm.	0.70	122.50
01/26/23	Kyle Ewing	Review minute order setting hearing on pending motions; conference with K. Hendricks re: providing notice of the same and next steps; email communication with G. Winkler re: the same	0.40	136.00
01/26/23	Kara B. Hendricks	Review minute order regarding hearing and follow-up with G. Winkler regarding posting requirements;	0.20	96.05
01/27/23	Kara B. Hendricks	Review emails and updated CAC stipulation and follow-up to finalize same;	0.30	144.08
01/31/23	Kara B. Hendricks	Call with G. Winkler and T. Miller regarding upcoming hearing and pending matters;	0.50	240.13
01/31/23	Kara B. Hendricks	Prepare notice for in camera review of investor list;	0.20	96.05

Total Hours: 10.90

Total Amount: \$ 4,305.77

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	5.10	565.00	2,881.50
Kyle Ewing	5.10	400.00	2,040.00
Cynthia L. Ney	0.70	295.00	206.50
Totals:	10.90		\$ 5,128.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	5.10	480.25	2,449.27
Kyle Ewing	5.10	340.00	1,734.00
Cynthia L. Ney	0.70	175.00	122.50
Totals:	10.90		\$ 4,305.77

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	Kara B. Hendricks	Prepare litigation update and request K. Ewing follow-up regarding status of Vantage matter;	0.80	384.20
01/13/23	Kara B. Hendricks	Participate in call with T. Miller and G. Winkler to discuss ARC issues and stipulation regarding CAC matter;	0.70	336.18
01/25/23	Kara B. Hendricks	Correspond with J. Hall regarding information for status report including citations to local rules and discuss next steps to moving things forward with K. Ewing;	0.30	144.08
01/31/23	Kara B. Hendricks	Follow-up regarding draft status report and review and revise same and prepare draft order relating to the same;	0.80	384.20
			Total Hours:	2.60
			Total Amount:	\$ 1,248.66

TIMEKEEPER SUMMARY FOR TASK CODE GW004.

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	2.60	565.00	1,469.00
Totals:	2.60		\$ 1,469.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	2.60	480.25	1,248.66
Totals:	2.60		\$ 1,248.66

TASK CODE: GW011 STATUS REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	Kyle Ewing	Update and review/revise litigation update section of receiver's upcoming quarterly report; communication with K. Hendricks re: the same; communication with counsel for Vantage re: dismissal of Vantage's ancillary proceeding against CapSource	0.50	170.00
01/24/23	Kyle Ewing	Plan and prepare for review/submittal of next quarterly status report, including researching law regarding status reports and status conferences/hearings mandated by local rules in connection with the same, as well as local rules re: notice to Court of pending motions with regard to last quarter's status report/fee applications; email communication with K. Hendricks re: the same	0.70	238.00
01/31/23	Kyle Ewing	Assist K. Hendricks with finalizing exhibits in support of the Receiver's status report in preparation for filing the same	0.20	68.00
Total Hours:			1.40	
Total Amount:				\$ 476.00

TIMEKEEPER SUMMARY FOR TASK CODE GW011,

STATUS REPORTS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	1.40	400.00	560.00
Totals:	1.40		\$ 560.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	1.40	340.00	476.00
Totals:	1.40		\$ 476.00

TASK CODE: GW014 TAX ISSUES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/23/23	Kyle Ewing	Confer with K. Hendricks re: finishing motion re: sales of properties and interim distributions in connection with the same	0.20	68.00
			Total Hours:	0.20
			Total Amount:	\$ 68.00

TIMEKEEPER SUMMARY FOR TASK CODE GW014,

TAX ISSUES

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.20	400.00	80.00
Totals:	0.20		\$ 80.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.20	340.00	68.00
Totals:	0.20		\$ 68.00

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**Summary of Fees (Base Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	7.70	565.00	4,350.50
Kyle Ewing	6.70	400.00	2,680.00
Cynthia L. Ney	0.70	295.00	206.50
Totals:	15.10		\$ 7,237.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	7.70	480.25	3,697.93
Kyle Ewing	6.70	340.00	2,278.00
Cynthia L. Ney	0.70	175.00	122.50
Totals:	15.10		\$ 6,098.43

Invoice No.: 1000221361
Re: SEC v. Capsource (Geoff Winkler, Receiver)
Matter No.: 209375.010300

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
01/12/23	VENDOR: Holo Discovery INVOICE#: 16667 DATE: 1/12/2023 FORENSIC IMAGE OF CAPSOURCE SERVER AND 4TB HARD DRIVE	\$	716.75
01/31/23	VENDOR: Holo Discovery INVOICE#: 16729 DATE: 1/31/2023 Copy Hard Drive	\$	216.75
		Total Expenses:	<hr/> \$ 933.50



Invoice No. : 1000246262
File No. : 209375.010300
Bill Dat : March 8, 202

Geoff Winkle
715 NW Hoyt Street, Suite 4364
Portland, OR 9720

INVOIC

Re: SEC v. Capsource (Geoff Winkler, Receiver)

Legal Services through February 28, 2023:

Total Fees	\$	15,509.6
Current Invoice:	\$	<u>15,509.63</u>
Previous Balance (see attached statement):	\$	56,105.34
Total Amount Due:	\$	<u><u>71,614.97</u></u>

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000246262
File No.: 209375.010300

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010300
INVOICE NUMBER: 1000246262*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	15,509.63
Previous Balance:	\$	56,105.34
Total Amount Due:	\$	71,614.97

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAUIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010300
INVOICE NUMBER: 1000246262*
BILLING
PROFESSIONAL: Kara B. Hendricks

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000246262
File No. : 209375.010300

Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000246262
 File No. : 209375.010300

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
10/11/22	1000127101	11,901.11	1,701.00	0.00	13,602.11
01/09/23	1000192221	9,798.96	0.00	0.00	9,798.96
01/30/23	1000207640	11,388.26	9.00	0.00	11,397.26
01/30/23	1000207944	14,189.08	86.00	0.00	14,275.08
02/10/23	1000221361	6,098.43	933.50	0.00	7,031.93
	Totals:	\$ 53,375.84	\$ 2,729.50	\$ 0.00	\$ 56,105.34

KBH:LC
 Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/23	Kara B. Hendricks	Respond to email from T. Miller and provide copy of investor list;	0.20	96.05
02/01/23	Kara B. Hendricks	Attention to emails regarding filing of investor list and service questions and follow-up with proposal for submittal (.4); Work with E. Escobar-Gaddi on submittal (.2);	0.60	288.15
02/02/23	Kara B. Hendricks	Review minute order; call with J. McGraw regarding notice for upcoming hearing;	0.20	96.05
02/03/23	Kara B. Hendricks	Respond to email from J. Liebman regarding CAC stipulation;	0.10	48.02
02/07/23	Kyle Ewing	Telephonic conference with J. McGraw re: various deals and information required to make motions for sale of property and/or distributions and additional information learned re: organization of CapSource and related entities; follow-up with K. Hendricks	0.60	204.00
02/07/23	Kara B. Hendricks	Follow-up with J. McGraw regarding service of hearing notice;	0.10	48.02
02/07/23	Kara B. Hendricks	Attention to email from B. Dyer and G. Winkler and follow-up regarding sale motion;	0.10	48.02
02/08/23	Kara B. Hendricks	Correspond with J. McGraw regarding imaged documents;	0.10	48.02
02/09/23	Kara B. Hendricks	Attention to email form D. Koch regarding CAC stipulation and follow-up in order to finalize same; Follow-up with T. Miller regarding filing;	0.30	144.07
02/09/23	Kara B. Hendricks	Discuss ancillary proceeding against 215 Bridge Street and follow-up with G. Winkler regarding pending litigation;	0.20	96.05
02/13/23	Kyle Ewing	Conference with K. Hendricks re: revising and completing motion for interim distributions and instructions re: property sales based on additional information and hearing setting	0.20	68.00
02/13/23	Kara B. Hendricks	Discuss 215 Bridge Street and Texas 156 questions with G. Winkler and follow-up with J. McGraw for additional background;	0.20	96.05
02/13/23	Kara B. Hendricks	Review information from J. McGraw regarding CapSource ongoing projects/investments and discuss motion needed to address issues with the Court with K. Ewing;	0.40	192.21
02/13/23	Kara B. Hendricks	Follow-up with G. Winkler re Texas 156 and respond to email from A. Reynolds;	0.10	48.02

02/14/23	Kyle Ewing	Email communication with G. Winkler and J. McGraw re: Thursday's meeting to further discuss issues related to motion for interim distributions; dealings with ARC and CapWest, among other items	0.10	34.00
02/14/23	Kara B. Hendricks	Review Capsource complaint filed against Texas 156 and related document and provide information to G. Winkler for further analysis;	0.40	192.10
02/14/23	Kara B. Hendricks	Correspond with A. Reynolds regarding Texas 156 and telephone call to discuss pending suit;	0.30	144.07
02/15/23	Kyle Ewing	Review J. McGraw's outline of information re: various CapSource loan projects and status of investments in preparation for tomorrow's meeting with McGraw and G. Winkler re: the receiver's motion(s) to make interim distributions and determine procedure for disposition of assets related to loan projects; otherwise prepare for the meeting	0.60	204.00
02/16/23	Kyle Ewing	Meeting with AFS (J. McGraw and G. Winkler) re: motion for interim distributions and re: sales of certain properties, as well as issues related to CapWest funds, Equisource, and Horizon Trust (1.3); finish planning and preparing for the meeting and review/further annotate notes from meeting in preparation for follow up with K. Hendricks (0.8)	2.10	714.00
02/16/23	Kyle Ewing	Email communication with AFS (G. Winkler and J. McGraw) and K. Hendricks re: scheduling call with borrower on King 261 project	0.10	34.00
02/16/23	Kara B. Hendricks	Attention to emails regarding Greenwood TX lots and proposal;	0.10	48.02
02/17/23	Kara B. Hendricks	Respond to email from R. Behle regarding CAC stipulation and provide copy of filing and status;	0.10	48.02
02/20/23	Kyle Ewing	Continue drafting/updating motion for interim distributions and instructions re: sales of real property and other assets; review prior status reports and notes re: various CapSource investments at issue in connection with the same; research law in support of pro rata distribution plan in connection with the same	1.60	544.00
02/20/23	Kara B. Hendricks	Attention to email from J. Hall regarding motion to employ tax professional;	0.10	48.02
02/21/23	Kyle Ewing	Follow up with K. Hendricks re: last week's meeting with G. Winkler and J. McGraw re: various outstanding CapSource issues, including interim distributions, forthcoming property sales, and issues with CapWest income fund (0.6); review notes from meeting and documents provided by J. McGraw in connection with the same	1.20	408.00

		(0.4) and follow up with C. Spaulding re: the same (0.2)		
02/21/23	Kyle Ewing	Continue drafting/updating motion for interim distributions and instructions re: sales of real property and other assets; review prior status reports and notes re: various CapSource investments at issue in connection with the same; research law in support of pro rata distribution plan in connection with the same; email communication with AFS team re: the same	3.40	1,156.00
02/21/23	Kara B. Hendricks	Work with E. Escobar-Gaddi and identify documents to review for upcoming hearing;	0.10	48.02
02/21/23	Kara B. Hendricks	Follow-up regarding 215 Bridge Street and inquiry regarding legal proceedings against same;	0.10	48.02
02/21/23	Kara B. Hendricks	Follow-up with K. Ewing regarding distribution and sale overlap (.2); Discuss motion regarding potential property sales and needed subpoenas with C. Spaulding (.3);	0.50	240.12
02/22/23	Kyle Ewing	Final drafting/updating motion for interim distributions and instructions re: sales of real property and other assets; review and revise the same; email communication with K. Hendricks and AFS team (J. McGraw, G. Winkler, and J. Hall) re: the same	1.20	408.00
02/22/23	Kara B. Hendricks	Review materials and prepare for hearing;	1.10	528.27
02/22/23	Kara B. Hendricks	Call with G. Winkler and J. McGraw regarding King 261 proposal and other Capsource related entities;	0.50	240.12
02/22/23	Kara B. Hendricks	Confer with G. Winkler regarding upcoming hearing and follow-up with court regarding video availability;	0.30	144.07
02/22/23	Kara B. Hendricks	Follow-up with M. Ferrario regarding 215 Bridgestreet inquiry;	0.20	96.05
02/22/23	Cynthia L. Ney	Analysis of files regarding Steve Scow documentation and Meredith enforcement action (.6); communications with K.Hendricks regarding same (.1).	0.70	122.50
02/22/23	Christian Spaulding	Review case file for pertinent facts, evidence, and status of proceedings including background of property purchases, deeds, notes, etc. as it relates to upcoming Motion regarding sale of various properties.	3.30	1,051.87
02/23/23	Kara B. Hendricks	Respond to email from D. Koch and provide CAC counsel copy of order granting stipulation to allow state court proceedings to move forward;	0.10	48.02
02/23/23	Kara B. Hendricks	Discuss hearing and case issues with G. Winkler;	0.30	144.07
02/23/23	Kara B. Hendricks	Prepare for and attend hearing on multiple filings and de-brief with T. Miller (2.5); Follow-up with investor attending hearing (.1);	2.60	1,248.65

02/23/23	Christian Spaulding	Evaluate complaint and related documents. Review file and relevant documents and begin analysis of related entities to be subpoenaed.	3.90	1,243.13
02/24/23	Christian Spaulding	Draft Subpoenas and related documents to Capwest Income LLC; Capwest Income II LLC; and Equisource. Communications with team regarding the same.	2.70	860.63
02/27/23	Kyle Ewing	Email communication with T. Bennett (counsel for Entrust) re: court's order granting stipulation to compromise Entrust lawsuit; review and finalize state court case stipulation in preparation for authorizing Bennett to file the same in the state court action	0.60	204.00
02/27/23	Kyle Ewing	Review draft subpoenas for entities related to CapSource (Capwest, Horizon Trust, and Equisource) and secretary of state information on entities compiled by C. Spaulding; email communication with K. Hendricks and C. Spaulding re: the same; provide comments and edits to draft subpoenas	0.20	68.00
02/27/23	Kyle Ewing	Conference with K. Hendricks re: results of last week's hearing before Judge Albregts and associated follow-up tasks, including resolution of stay issues for resolution of CapSource Entrust litigation and edits/comments to draft motion for interim distributions/property sale instructions	0.20	68.00
02/27/23	Kara B. Hendricks	Review minute order regarding Entrust suit and discuss next steps with K. Ewing;	0.30	144.07
Total Hours:			32.40	
Total Amount:				\$ 12,050.57

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	9.70	565.00	5,480.50
Kyle Ewing	12.10	400.00	4,840.00
Christian Spaulding	9.90	375.00	3,712.50
Cynthia L. Ney	0.70	295.00	206.50
Totals:	32.40		\$ 14,239.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	9.70	480.25	4,658.44
Kyle Ewing	12.10	340.00	4,114.00
Christian Spaulding	9.90	318.75	3,155.63

Cynthia L. Ney

	<u>0.70</u>	<u>175.00</u>	<u>122.50</u>
Totals:	32.40		\$ 12,050.57

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/03/23	Kyle Ewing	Draft motion for order authorizing employment of Baker Tilly as tax professionals; draft Shawver declaration in support of the same; email communication with G. Winkler and J. Hall re: the same;	2.50	850.00
02/08/23	Kyle Ewing	draft proposed order granting the motion Review and revise draft motion to seal exhibits to certificate of service; finalize the motion in preparation for filing; email communication with K. Hendricks and E. Escobar-Gaddi re: the same	0.70	238.00
02/08/23	Kyle Ewing	Email communication with G. Winkler and J. Hall re: status of review of declaration in support of receiver' motion to employ tax professional; review and revise motion and declaration in anticipation of filing the same	0.70	238.00
02/08/23	Kara B. Hendricks	Prepare motion to seal and correspond with J. McGraw regarding service lists;	1.00	480.25
02/08/23	Kara B. Hendricks	Attention to email from J. McGraw regarding issues with serving notice via email and update notice language to adapt to platform;	0.60	288.15
02/09/23	Kyle Ewing	Email communication with J. Hall (AFS) re: obtaining declaration in support of motion to employ tax professionals from Baker Tilly	0.20	68.00
02/21/23	Kara B. Hendricks	Update motion to employ Baker Tilly based on signed declaration (.4); Email T. Miller regarding same (.1); Follow-up with J. Hall via email regarding engagement letter (.1);	0.60	288.15
02/22/23	Kara B. Hendricks	Telephone call to T. Miller to discuss emergency motion and request for video appearance at hearing (.1); Prepare motion to allow Receiver to appear at hearing via telephone or video, supporting declaration and proposed order (1.1); Telephone calls with G. Winkler regarding same (.1); Telephone call with court and circulate update (.2);	1.50	720.37
Total Hours:			7.80	
Total Amount:				\$ 3,170.92

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	3.70	565.00	2,090.50
Kyle Ewing	4.10	400.00	1,640.00
Totals:	7.80		\$ 3,730.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	3.70	480.25	1,776.92
Kyle Ewing	4.10	340.00	1,394.00
Totals:	7.80		\$ 3,170.92

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/17/23	Kara B. Hendricks	Communicate with S. Scow regarding pending litigation matters involving Capsource;	0.20	96.05
02/27/23	Kara B. Hendricks	Call from B. Stanley regarding North Dakota property invested in by husband and follow-up with G. Winkler and team to provide additional support;	0.30	144.07
02/28/23	Kara B. Hendricks	Correspond with J. McGraw regarding inquiry from B. Stanley and next steps;	0.10	48.02
Total Hours:			0.60	
Total Amount:				\$ 288.14

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	565.00	339.00
Totals:	0.60		\$ 339.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.60	480.23	288.14
Totals:	0.60		\$ 288.14

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**Summary of Fees (Base Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	14.00	565.00	7,910.00
Kyle Ewing	16.20	400.00	6,480.00
Christian Spaulding	9.90	375.00	3,712.50
Cynthia L. Ney	0.70	295.00	206.50
	<hr/>	<hr/>	<hr/>
Totals:	40.80		\$ 18,309.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	14.00	480.25	6,723.50
Kyle Ewing	16.20	340.00	5,508.00
Christian Spaulding	9.90	318.75	3,155.63
Cynthia L. Ney	0.70	175.00	122.50
	<hr/>	<hr/>	<hr/>
Totals:	40.80		\$ 15,509.63

Invoice No.: 1000246262
Re: SEC v. Capsource (Geoff Winkler, Receiver)
Matter No.: 209375.010300

Page 11

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 1000272020
 File No. : 209375.010300
 Bill Date : April 13, 2023

Geoff Winkler
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

INVOICE

Re: SEC v. Capsource (Geoff Winkler, Receiver)

Legal Services through March 31, 2023:

	Total Fees:	\$	8,166.90
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Expenses:

Subpoenas	160.00
Transcript Charges	191.25
Information and Research	143.81

	Total Expenses:	\$	495.06
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	Current Invoice:	\$	8,661.96
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	Previous Balance (see attached statement):	\$	39,548.60
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	Total Amount Due:	\$	48,210.56
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KBH:LC
 Tax ID: 13-3613083



Invoice No.: 1000272020
File No.: 209375.010300

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010300
INVOICE NUMBER: 1000272020*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	8,661.96
Previous Balance:	\$	39,548.60
Total Amount Due:	\$	48,210.56

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010300
INVOICE NUMBER: 1000272020*
BILLING
PROFESSIONAL: Kara B. Hendricks

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

KBH:LC
Tax ID: 13-3613083



Invoice No. : 1000272020
File No. : 209375.010300

Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000272020
 File No. : 209375.010300

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
10/11/22	1000127101	2,380.22	0.00	0.00	2,380.22
01/09/23	1000192221	9,798.96	0.00	0.00	9,798.96
01/30/23	1000207640	2,279.45	0.00	0.00	2,279.45
01/30/23	1000207944	2,548.41	0.00	0.00	2,548.41
02/10/23	1000221361	6,098.43	933.50	0.00	7,031.93
03/08/23	1000246262	15,509.63	0.00	0.00	15,509.63
	Totals:	\$ 38,615.10	\$ 933.50	\$ 0.00	\$ 39,548.60

KBH:LC

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/02/23	Kyle Ewing	Review minute order in ARC RE matter pending in Eighth Judicial District court;	0.10	34.00
03/02/23	Kara B. Hendricks	conference with K. Hendricks re: the same Attention to email from S. Scow regarding ARC proceeding and discuss knowledge of same with K. Ewing;	0.20	96.05
03/07/23	Kyle Ewing	Follow up with G. Winkler and J. McGraw re: motion for instructions re: real estate procedures and interim distributions; review and revise draft in connection with the same; confer with K. Hendricks re: possibility of appending a request for payment of the CRO to the motion	1.00	340.00
03/07/23	Kyle Ewing	Review and makes edits to subpoenas to CapWest, CapWest II, and Equisource; finalize in preparation for receiver's review and email communication with G. Winkler re: the same	0.80	272.00
03/07/23	Kara B. Hendricks	Respond to email from G. Winkler regarding amounts owed for work pre-receivership and discuss incorporating same in to draft motion with K. Ewing;	0.20	96.05
03/08/23	Kyle Ewing	Further review/edits to subpoenas to Capwest entities, Equisource, and Horizon trust; communication with GT team re: the same	0.40	136.00
03/08/23	Kara B. Hendricks	Follow-up with K. Ewing and C. Spaulding regarding subpoenas and review exhibit to Capwest subpoena;	0.30	144.08
03/09/23	Kyle Ewing	Finalize and serve subpoenas related to affiliated Capsource entities (Capwest I and II, Equisource, and Horizon Trust); communication with C. Ney re: the same	0.40	136.00
03/09/23	Kara B. Hendricks	Follow-up with K. Ewing and C. Spaulding regarding finalizing subpoenas to related entities;	0.20	96.05
03/09/23	Cynthia L. Ney	Preparation of subpoena directed to Horizon Trust Co. and edit/finalize subpoenas to Capwest Income LLC, Capwest Income II LLC and Equisource LLC (.1.1); arrangements for service of subpoenas (.4); prepare Notice of Issuance of Subpoenas and service of same upon Terry Miller (.4); communications with K.Ewing and K.Hendricks regarding subpoenas (.2).	2.10	367.50
03/14/23	Kyle Ewing	Email communication with G. Winkler re:	0.10	34.00

		receiver's motion for approval of interim distributions and other procedures		
03/14/23	Cynthia L. Ney	Various communication with process server regarding service of subpoenas and research new addresses.	0.70	122.50
03/15/23	Kyle Ewing	Begin reviewing and revising receiver's motion for approval of interim distributions and other procedures to address comments of J. McGraw and G. Winkler	0.30	102.00
03/15/23	Kyle Ewing	Telephonic conference with G. Winkler re: receiver's motion for approval of interim distributions and other procedures, including discussion of application of 28 U.S.C. S. 2001 to sales of first or second deeds of trust securing realty and appropriate hold-back threshold	0.50	170.00
03/15/23	Kara B. Hendricks	Confer with G. Winkler, J. McGraw and K. Ewing regarding pending matters including draft motion to sell and distribute, claimant concerns and questions regarding entities, necessary filings with secretary of state and related case issues;	0.60	288.15
03/15/23	Kara B. Hendricks	Review correspondence regarding hearing transcript and forward copy of same to G. Winkler;	0.10	48.03
03/15/23	Cynthia L. Ney	Communications with K.Ewing and process server regarding service of subpoenas.	0.30	52.50
03/16/23	Kyle Ewing	Email communication with J. McGraw re: information related to each loan/deal for which the Receiver is proposing selling CapSource's interest in connection with further edits to the Receiver's motion for approval of interim distribution plan and procedures for selling real property	1.50	510.00
03/17/23	Kara B. Hendricks	Follow-up K. Ewing regarding pending motion;	0.10	47.98
03/22/23	Kyle Ewing	Continue reviewing and revising draft motion for approval of interim distributions and other procedures to address comments of G. Winkler and J. McGraw and incorporate additional information regarding CapSource "deals" provided by J. McGraw	0.20	68.00
03/22/23	Kara B. Hendricks	Review information from J. McGraw regarding CapSource entities and reporting requirements and follow-up;	0.50	240.13
03/22/23	Kara B. Hendricks	Review minute order and pull docket information regarding ARC RE lawsuit in Nevada and follow-up with G. Winkler and J. McGraw regarding same;	0.30	144.08
03/22/23	Cynthia L. Ney	Review and electronic organization of affidavits of service for various subpoenas served.	0.30	52.50
03/23/23	Kara B. Hendricks	Request C. Ney assistance with updating corporate filings for ARC/Capsorce entities;	0.10	48.03

03/23/23	Kara B. Hendricks	Review docket sheet relating to ARC RE LLC lawsuit against Arizona Rehab Campus entities and telephone call (x2) to J. Hunt (.3); Send follow-up email outlining issues to discuss (.2);	0.50	240.13
03/23/23	Cynthia L. Ney	Research various entities at Secretary of State and compile printouts (.6); communications with K.Hendricks regarding same (.1).	0.70	122.50
03/24/23	Kyle Ewing	Email communication with K. Hendricks re: CapSource related entities subpoenas and the entities' failures to make productions or objections by deadline and issues related to JC Commercial loan and potential misuse of proceeds by mortgagor and CapSource	0.20	68.00
03/24/23	Kara B. Hendricks	Review correspondence from J. Giardino regarding CapWest and related subpoenas and follow-up with G. Winkler regarding same; Discuss subpoena issues with K. Ewing;	0.20	96.05
03/24/23	Kara B. Hendricks	Review information from Secretary Of State regarding entities requiring updated filings; Follow-up with G. Winkler;	0.20	96.05
03/26/23	Kyle Ewing	Review documents and analysis related to misuse of JC commercial loan proceeds provided by J. McGraw in connection with developing strategy for investigating potential recovery for anticipated deficiency in collection of assets securing the loan	0.50	170.00
03/27/23	Kyle Ewing	Further review of documents/information related to JC commercial and potential misuse of loan proceeds (0.1); confer with K. Hendricks re: the same as well as final revisions to motion for interim distributions and to address dispositions of real property interests (0.2)	0.30	102.00
03/28/23	Kyle Ewing	Finish making reviews and revisions to receiver's motion for interim distributions to address comments/edits of J. McGraw and G. Winkler; finalize the same for review by K. Hendricks and Winkler/McGraw; further research of law in connection with the same	4.80	1,632.00
03/28/23	Kyle Ewing	Conference with K. Hendricks re: revisions/updates to receiver's motion for interim distributions/instructions for disposing of real property interests; email communication with McGraw/Winkler re: the same	0.10	34.00
03/28/23	Kyle Ewing	Telephonic conference with J. McGraw re: motion for interim distributions and further analysis to be done regarding each of the CapSource "deals" under consideration, including issues re: use of JC Commercial loan proceeds	0.90	306.00

03/28/23	Kara B. Hendricks	Follow-up with J. Hunt regarding NV ARC lawsuit and stipulation to stay (.1); Review correspond from A. Reynolds regarding Texas proceeding and follow-up with G. Winkler and A. Reynolds (.1);	0.20	96.05
03/29/23	Kyle Ewing	Further analysis of applicability of 28 USC 2001 to anticipated reconveyance of deeds of trust in favor of CapSource and in response to questions/comments raised by G. Winkler re: proposed motion for distributions; email communication with G. Winkler and K. Hendricks re: the same	0.90	306.00
03/29/23	Kyle Ewing	Further review and revision to motion for interim distributions/further instructions to address comments of G. Winkler	1.00	340.00
03/30/23	Kara B. Hendricks	Review emails from T. Miller regarding Zipprich matters;	0.10	48.03
03/31/23	Kara B. Hendricks	Respond to email from B. Dyer regarding sale procedure;	0.10	48.03
03/31/23	Kara B. Hendricks	Discuss Capsource subpoena response with J. Giradino and send confirming email;	0.20	96.05
03/31/23	Kara B. Hendricks	Respond to email from C. Berry regarding Nevada ARC lawsuit;	0.10	48.03
03/31/23	Kara B. Hendricks	Review and revise motion regarding interim distribution plan and follow-up with K. Ewing and G. Winkler regarding same; Send draft to T. Miller for review and comment;	0.80	384.20

Total Hours: 23.10

Total Amount: \$ 7,878.75

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	5.00	610.00	3,050.00
Kyle Ewing	14.00	450.00	6,300.00
Cynthia L. Ney	4.10	295.00	1,209.50
Totals:	23.10	457.12	\$ 10,559.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	5.00	480.25	2,401.25
Kyle Ewing	14.00	340.00	4,760.00
Cynthia L. Ney	4.10	175.00	717.50
Totals:	23.10	341.07	\$ 7,878.75

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/07/23	Kara B. Hendricks	Prepare notice of non-opposition to motion to employ tax professionals;	0.20	96.05
03/31/23	Kara B. Hendricks	Attention to email from J. McGraw regarding registered agent; Follow-up with C. Ney regarding corporate filings;	0.20	96.05
			Total Hours:	0.40
			Total Amount:	\$ 192.10

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.40	610.00	244.00
Totals:	0.40	610.00	\$ 244.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.40	480.25	192.10
Totals:	0.40	480.25	\$ 192.10

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/28/23	Kara B. Hendricks	Discuss motion and third party litigation issues with K. Ewing;	0.20	96.05
			Total Hours:	0.20
			Total Amount:	\$ 96.05

TIMEKEEPER SUMMARY FOR TASK CODE GW005,

CLAIMS ADMINISTRATION AND OBJECTIONS

Summary of Fees (Standard Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.20	610.00	122.00
Totals:	0.20	610.00	\$ 122.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kara B. Hendricks	0.20	480.25	96.05
Totals:	0.20	480.25	\$ 96.05

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY**Summary of Fees (Base Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	5.60	565.00	3,164.00
Kyle Ewing	14.00	400.00	5,600.00
Cynthia L. Ney	4.10	295.00	1,209.50
	<hr/>	<hr/>	<hr/>
Totals:	23.70		\$ 9,973.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	5.60	480.25	2,689.40
Kyle Ewing	14.00	340.00	4,760.00
Cynthia L. Ney	4.10	175.00	717.50
	<hr/>	<hr/>	<hr/>
Totals:	23.70		\$ 8,166.90

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8 *Attorneys for Receiver Geoff Winkler*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 vs.

15 CAPSOURCE, INC., *et. al.*,

16 Defendants.
17

CASE NO. 2:20-CV-02303-RFB-DJA

**[PROPOSED] ORDER GRANTING
THIRD QUARTERLY APPLICATION
FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES
OF RECEIVER AND RECEIVER’S
COUNSEL GREENBERG TRAURIG
FOR PERIOD JANUARY 1, 2023
THROUGH MARCH 31, 2023**

18
19 The Court having reviewed the Receiver’s Third Quarterly Application for Payment of
20 Fees and Reimbursement of Expenses of Receiver and Receiver’s counsel Greenberg Traurig, LLP
21 (“Application”) for the period of January 1, 2023 through March 31, 2023 (“Application Period”),
22 and having found that notice was proper and that cause exists to approve the Application, orders
23 as follows:

24 1. American Fiduciary Services (“AFS”) fees and expenses incurred during the
25 Application Period, in the respective amounts of \$110,026.50 and \$13,762.59 are approved;

26 ///

27 ///

28 ///

