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10 *Attorneys for Receiver*
11 *Geoff Winkler of American Fiduciary Services*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
15 COMMISSION,

16 Plaintiff,

17 v.

18 PROFIT CONNECT WEALTH
SERVICES, INC., JOY I. KOVAR, and
19 BRENT CARSON KOVAR,

20 Defendants.

Case No. 2:21-cv-01298-JAD-BNW

**ERRATA TO APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
TEMPORARY RECEIVER AND HIS
PROFESSIONALS (ECF NO. 37)**

21 Receiver Geoff Winkler of American Fiduciary Services, LLC, submits this
22 errata in connection with his application for the allowance and payment of his fees
23 and costs, as well as the fees and costs of his professionals, during the period when
24 Mr. Winkler served as the temporary receiver. (ECF No. 37). The application
25 attached as exhibit 4 the declaration of Sergio Kopelev of Stroz Friedberg (ECF No.
26 37-4), one of the Receiver's professionals. Mr. Kopelev's declaration should have itself
27 attached an invoice issued by Stroz Friedberg for certain fees and costs Stroz
28 Friedberg incurred during the temporary receivership period. Due to a clerical error,

1 however, an invoice issued by Smiley Wang-Ekvall was attached to Mr. Kopelev's
2 declaration instead. To correct that error, the Receiver now attaches the Stroz
3 Friedberg invoice to this errata as Exhibit 1.

4
5 Dated: August 24, 2021

6 BALLARD SPAHR LLP

7 By: /s/ Maria A. Gall
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12 -and-

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CERTIFICATE OF SERVICE

On August 24, 2021, I served the foregoing **ERRATA TO APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND COSTS OF THE TEMPORARY RECEIVER AND HIS PROFESSIONALS (ECF NO. 37)** on the following parties through their counsel of record by filing the same with the Court's CM/ECF system:

Plaintiff Securities and Exchange Commission:

Kathryn C. Wanner, Esq.
Teri M. Melson, Esq.
Securities and Exchange Commission
444 S. Flower Street, Suite 900
Los Angeles, California 90071
Tel: (323) 965-3998
Fax: (213) 443-1904
wannerk@sec.gov
nelsont@sec.gov

Defendants Joy I. Kovar and Brent Carson Kovar:

Dale A. Hayes, Jr., Esq.
Jeremy D. Homes, Esq.
Hayes Wakayama
4735 S. Durago Drive, Suite 105
Las Vegas, Nevada 89147
Tel: (702) 656-0808
Fax: (702) 655-1047
dhayes@hwlawNV.com
jholmes@hwlawNV.com

/s/ Adam Crawford
An Employee of Ballard Spahr LLP

EXHIBIT 1

EXHIBIT 1

PRO FORMA INVOICE

Invoice Number: K0301-0006828
Customer Number: 104460608



Geoff Winkler
 American Fiduciary Services, LLC
 715 NW Hoyt Street, #4364
 Portland, OR 97208

Invoice Date: 20 Aug 2021
Due Date: 19 Sep 2021
Email: geoff@americanfiduciaryservices.com
Project ID: PRJ-0000030415
Project Name: Project Valeria
Project Manager: Sergio Kopelev

For services provided from 01 Jul 2021 to 31 Aug 2021

Other Charges/Services	2,500.00
Hourly Fees	118,683.75
Expenses	1,365.24
Sub-total:	122,548.99
Total Payable in USD:	122,548.99

Payment is due within 30 days of the invoice date.

Please indicate Customer # 104460608, Invoice # K0301-0006828 and the amount paid on the Electronic Payment or Check to ensure funds are applied to your account.

Electronic Payment	Check	Tax IDs	Informational copies sent to:
Stroz Friedberg, LLC JPMorgan Chase Bank, N.A. 1 Chase Manhattan Plaza New York, NY 10005 United States of America SWIFT Code: CHASUS33 ABA Routing Number: 021000021 Account Number: 441613064165	Stroz Friedberg, LLC PO Box 975348 Dallas, TX 75397-5348		

If you have questions regarding the charges on this invoice, please contact your Aon Representative. If you need assistance with paying this invoice, please email Financial.Accounts.Receivable@aon.com.

PRO FORMA INVOICE

Invoice Number: K0301-0006828
 Customer Number: 104460608

**Other Charges/Services Summary**

Service	Quantity	Amount
Fee for O365 collection and response tool	1	2,500.00
Sub-total:		2,500.00

Hourly Fees Summary

Consultant	Hours	Amount
Allan Vogel	79.15	41,553.75
Ericka Browne	2.00	390.00
Jishnu Pradeep	89.00	46,725.00
Joe Rossi	1.50	292.50
Kyle Henson	3.00	1,575.00
Oleg Gorodetskiy	3.00	585.00
Rachel Kang	1.25	656.25
Sergio Kopelev	51.25	26,906.25
Sub-total:	230.15	118,683.75

Expenses Summary

Expense Item	Amount
Airfare - Baggage Fee	130.00
Auto - Mileage (US)	179.20
Auto - Parking	15.70
Hotel - Other	631.63
Meals - Employee (Individual)	340.34
Transportation – Bus/Taxi/Limousine/Ground	68.37
Sub-total:	1,365.24

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**Hourly Fees Details**

Date	Consultant	Narrative	Hours	Amount
26 Jul 2021	Allan Vogel	On-site work: interview Personell; Identify hardware and software, Identify crypto miners; gain access to resources.	11.50	6,037.50
26 Jul 2021	Jishnu Pradeep	On-site work. Interview IT personnel; Add litigation holds to O365 accounts; perform email collection of corporate O365 accounts; Verify evidence. Assign evidence numbers and copy it to OAD/WD drives. Package email collections and send to E-Discovery team. Attend team calls and meetings to discuss progress.	6.50	3,412.50
26 Jul 2021	Jishnu Pradeep	Travel to client location in Las Vegas, NV, from Minneapolis, MN.	11.50	6,037.50
26 Jul 2021	Sergio Kopelev	On-site work: data collection and analysis; assist with interviews; confer with and direct staff;	6.50	3,412.50
27 Jul 2021	Allan Vogel	On-site work: Identify crypto miners; collect O365 account content; assist with collection of accounting reports.	10.00	5,250.00
27 Jul 2021	Jishnu Pradeep	On-site work: Perform OneDrive collections of corporate O365 accounts. Perform collection of all banking statements for the Bank of America accounts provided. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives. Package the files from OneDrive collection and send to E-Discovery team. Upload Bank of America statements to Lockbox for the client. Attend team calls and meetings to discuss progress.	10.00	5,250.00
27 Jul 2021	Sergio Kopelev	On-site work: data collection and analysis; assist with interviews; confer with and direct staff; analysis of banking records; craft and provide updates.	9.50	4,987.50
28 Jul 2021	Allan Vogel	On-site work: assistance with collection of accounting reports, assistance with control of various Profit Connect systems, identification of OneDrive accounts,	8.50	4,462.50
28 Jul 2021	Jishnu Pradeep	On-site work: Perform OneDrive collection of corporate O365 accounts and database collection from WordPress website. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives. Package the files from OneDrive collection and send to E-Discovery team. Process and upload WordPress database along with reports to Lockbox folder for client review. Attend team calls and meetings to discuss progress.	9.00	4,725.00
28 Jul 2021	Kyle Henson	Performed Office 365 collections for Profit Connect.	3.00	1,575.00
28 Jul 2021	Rachel Kang	On-site work: Kick off O365 collection for matter. Pull logs and provide to team via radix.	1.25	656.25
28 Jul 2021	Sergio Kopelev	On-site work: data collection and analysis; assist with interviews; confer with and direct staff; analysis of banking records; craft and provide updates.	5.00	2,625.00
29 Jul 2021	Allan Vogel	On-site work: Assist receiver staff with taking control of security systems; identification of admin resources; forensic collections.	5.00	2,625.00
29 Jul 2021	Jishnu Pradeep	On-site work: Perform keyword searches for gmail accounts of J.Kovar, B.Kovar, and T.Luzhanska on O365. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives. Upload the reports for keyword searches to internal Lockbox folder for review. Attend team calls and meetings to discuss progress.	8.00	4,200.00
29 Jul 2021	Sergio Kopelev	On-site work: data collection and analysis; assist with interviews; confer with and direct staff; analysis of banking records; craft and provide updates.	5.00	2,625.00
30 Jul 2021	Allan Vogel	Travel from Las Vegas to Salt Lake City. Plane Delayed.	5.50	2,887.50
30 Jul 2021	Allan Vogel	On-site work: Collection of admin resources, Forensic collection of devices at branch office.	6.50	3,412.50
30 Jul 2021	Jishnu Pradeep	On-site work: Perform intake, document, photograph, and forensic collections. Extract desktop folder from ES07A and send to the client for review. Package and send a copy to EDD for processing. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	6.50	3,412.50
30 Jul 2021	Sergio Kopelev	On-site work: data collection and analysis; assist with interviews; confer with and direct staff; analysis of banking records; craft and provide updates.	4.50	2,362.50
31 Jul 2021	Allan Vogel	Trouble shooting online cameras.	1.00	525.00
31 Jul 2021	Jishnu Pradeep	On-site work: On-site work: Perform intake, document, photograph, and forensic collections. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	3.50	1,837.50
31 Jul 2021	Sergio Kopelev	Confer with and direct staff; analysis of banking records; craft and provide updates.	2.25	1,181.25
01 Aug 2021	Allan Vogel	Travel from Salt Lake City to Las Vegas	4.15	2,178.75
01 Aug 2021	Jishnu Pradeep	Generate mobile device report for ES09 (E. Garrison's iPhone). Package and send to E-Discovery.	2.00	1,050.00
01 Aug 2021	Sergio Kopelev	Confer with and direct staff; assist with interview.	1.50	787.50
02 Aug 2021	Allan Vogel	On-Site work: Worked with staff to validate crypto-mining operations. Evaluated camera system to determine how to take ownership. Managed evidence collection and set up evidence locker. Collection of Bill R. Phone and Gmail.	8.00	4,200.00

PRO FORMA INVOICE

Invoice Number: K0301-0006828
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**Hourly Fees Details**

Date	Consultant	Narrative	Hours	Amount
02 Aug 2021	Jishnu Pradeep	On-site work: Perform intake, document, photograph, and forensic collections. Package and send B.Roshak's Mobile device report to EDD for processing; Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	8.00	4,200.00
02 Aug 2021	Joe Rossi	CI processing and database setup.	1.50	292.50
02 Aug 2021	Sergio Kopelev	On-Site data collection and analysis; assist with interviews; confer with and direct staff;	3.75	1,968.75
03 Aug 2021	Allan Vogel	Worked on O365 Keywords and analyzing data. Investigation on crypto-wallets and collection of crypto earned. In addition working on determining if current production is viable.	8.00	4,200.00
03 Aug 2021	Ericka Browne	Review data transfer options with production team and coordinate process of same. Project oversight.	1.00	195.00
03 Aug 2021	Jishnu Pradeep	On-site work: Perform intake, document, photograph, and forensic collections. Package and send B.Roshak's Mobile device report to EDD for processing. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	8.00	4,200.00
03 Aug 2021	Oleg Gorodetskiy	Process 1 Mobile device using Communications Intelligence app: ES0009A	1.50	292.50
03 Aug 2021	Sergio Kopelev	On-Site data collection and analysis; assist with interviews; confer with and direct staff;	3.00	1,575.00
04 Aug 2021	Allan Vogel	Preparation to remove current ownership from door locks. Assisted in setting up cameras to record.	5.00	2,625.00
04 Aug 2021	Ericka Browne	Project update call with S. Kopelev. Work with team to finalize transfer of data for processing. Project oversight.	1.00	195.00
04 Aug 2021	Jishnu Pradeep	On-site work: Perform intake, document, photograph, and forensic collections. Package and send B.Roshak's Google Takeout to EDD for processing. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	5.00	2,625.00
04 Aug 2021	Sergio Kopelev	Confer with and direct staff.	2.00	1,050.00
05 Aug 2021	Allan Vogel	Covid Testing. Review of cameras and door access. Worked on keyword search for client.	5.00	2,625.00
05 Aug 2021	Jishnu Pradeep	Time spent at Covid testing location.	3.00	1,575.00
05 Aug 2021	Sergio Kopelev	Covid testing; Confer with and direct staff; confer with receiver; email searches.	6.75	3,543.75
06 Aug 2021	Allan Vogel	On-site work: Review of door access.	1.00	525.00
06 Aug 2021	Jishnu Pradeep	Travel from client location (Las Vegas, NV) to Minneapolis, MN.	6.00	3,150.00
06 Aug 2021	Jishnu Pradeep	On-site work: Perform O365 and OneDrive collection. Package and send to EDD for processing. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	2.00	1,050.00
06 Aug 2021	Oleg Gorodetskiy	Process 1 Mobile device using Communications Intelligence app: ES0016A	1.50	292.50
06 Aug 2021	Sergio Kopelev	Confer with and direct staff; confer with receiver;	1.50	787.50
Sub-total Hourly Fees Details			230.15	118,683.75