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

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE  
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**APPLICATION FOR ALLOWANCE AND  
PAYMENT OF FEES AND COSTS OF  
THE RECEIVER AND HIS  
PROFESSIONALS FOR THE PERIOD  
FROM JANUARY 1, 2023, THROUGH  
MARCH 31, 2023**

21  
22  
23 Geoff Winkler of American Fiduciary Services, LLC, the permanent receiver (the  
24 "Receiver") over Profit Connect Wealth Services, Inc., and any subsidiaries and affiliates  
25 (together, "Profit Connect") pursuant to an order entered on August 6, 2021 (the "Receiver Order"),  
26 submits this application for allowance and payment of his fees and costs and the fees and costs of  
27 the professionals he employed to assist him in fulfilling his duties under the Receiver Order. The  
28 period of time covered by this Application is from January 1, 2023, through March 31, 2023 (the

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1 "Application Period"). The Receiver is informed that the Securities & Exchange Commission  
2 ("SEC") has no objection to the relief sought in this Application.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 Because the Receiver is not a licensed attorney, does not have in-house counsel, and is not  
5 a computer expert, he employed professionals to assist him in fulfilling his duties as the Receiver.  
6 Specifically, pursuant to Section X.G. of the Receiver Order, he retained Smiley Wang-Ekvall,  
7 LLP, and Ballard Spahr, LLP, as counsel and Stroz Friedberg as his computer forensic experts.  
8 The Court approved their employment by order entered on September 21, 2021. In 2022, Maria  
9 Gall resigned from Ballard Spahr after her appointment to the bench, so the Court approved the  
10 Receiver's retention of Greenberg Traurig as Nevada counsel.

11 Pursuant to this Application, the Receiver and his professionals seek approval of the  
12 following fees and costs:

- 13 (1) \$59,723.50 in fees and \$1,660.89 in costs for the Receiver;
- 14 (2) \$12,038.53 in fees and \$1,279.72 in costs for Greenberg Traurig;
- 15 (3) \$9,588.85 in fees and \$88.13 in costs for Smiley Wang-Ekvall, LLP;
- 16 (4) \$429.50 in fees and \$4.60 in costs for Baker Tilly, LLP; and
- 17 (5) \$58.50 in fees and \$25,749.30 for licensing and hosting costs for Technology

18 Concepts & Design, Inc., which was formerly part of Stroz Friedberg.

19 The Receiver seeks authority to pay 80% of the fees on an interim basis and 100% of the costs.

20 This Application is based on the below written argument, the declarations of Geoff  
21 Winkler, Kara Hendricks, Esq., Kyra E. Andrassy, Esq., Stacy Chiang, Sergio Kopelev, and Ericka  
22 Browne, all papers on file, and any argument the Court may call and consider.

23  
24 **I. RELEVANT BACKGROUND AND PROCEDURAL HISTORY**

25 The SEC initiated this action against Profit Connect, Joy Kovar, and Brent Kovar on July  
26 8, 2021, by the sealed, ex parte filing of a complaint and motion for temporary restraining order  
27 seeking, among other things, the freezing of defendants' assets and the appointment of a receiver  
28 over Profit Connect. The Court granted the ex parte temporary restraining order, in part, by

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1 allowing the asset freeze to proceed but set the motion for a hearing in order to provide defendants  
2 an opportunity to be heard on the temporary receivership request.

3 On July 23, 2021, defendants stipulated to modify the temporary restraining order to  
4 appoint the Temporary Receiver. By order entered on August 6, 2021, the Court approved a  
5 stipulation of the parties appointing the Receiver as the permanent receiver.

6 During this Application Period, the Receiver's focus has been on identifying potential  
7 claims held by the receivership estate that can be pursued in order to generate additional recoveries  
8 and on putting together the proposed claims procedure that is being presented to the Court for  
9 approval.

10 As of March 31, 2023, the Receiver is holding \$17,643,925.89. The fees incurred in the  
11 past two quarters are expected to result in the generation of additional recoveries for the estate in  
12 excess of the fees incurred. As was set forth in the motion to approve the employment of the  
13 professionals and because receivership work is a form of public service, each of the professionals  
14 has agreed to discount their typical hourly rate by 15%, and this discount is reflected in the fees  
15 being sought in this Application.

16

17 **II. LEGAL AUTHORITY**

18 “The power of a district court to impose a receivership ... derives from the inherent power  
19 of a court of equity to fashion effective relief.”<sup>1</sup> “The primary purpose of equity receiverships is  
20 to promote orderly and efficient administration of the Receivership Estate by the district court for  
21 the benefit of creditors.”<sup>2</sup> “[T]he practice in administering an estate by a receiver ... must accord  
22 with the historical practice in federal courts or with a local rule.”<sup>3</sup>

23 As the Ninth Circuit explained:

24 A district court’s power to supervise an equity receivership and to  
25 determine the appropriate action to be taken in the administration of

26 <sup>1</sup> *SEC v. Wencke*, 622 F.2d 1363, 1369 (9th Cir. 1980).

27 <sup>2</sup> *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986.)

28 <sup>3</sup> Fed. R. Civ. P. 66.

1 the receivership is extremely broad. The district court has broad  
2 powers and wide discretion to determine the appropriate relief in an  
3 equity receivership. The basis for this broad deference to the district  
4 court's supervisory role in equity receiverships arises out of the fact  
5 that most receiverships involve multiple parties and complex  
6 transactions.<sup>4</sup>

7 Decisions regarding the timing and amount of an award of fees and expenses to the  
8 Receiver and his or her professionals are committed to the sound discretion of the Court.<sup>5</sup> In  
9 determining the reasonableness of fees and expenses requested in this context, the Court should  
10 consider the time records presented, the quality of the work performed, the complexity of the  
11 problems faced, and the benefit of the services rendered to the Estate, along with the Commission's  
12 position on the request, which is entitled to "great weight."<sup>6</sup>

### 13 **III. THE FEES AND COSTS BEING REQUESTED**

14 As set forth in prior applications, in evaluating the fees and costs of the Receiver and his  
15 professionals, the fact that Profit Connect had no books and records, including books of account,  
16 or any functioning accounting department must be taken into account. The absence of these  
17 records means that the Receiver and his team were forced to get the documents from third parties  
18 that they need to determine what happened with funds put in by investors. This has required the  
19 issuance of subpoenas to third parties, including financial institutions, and often ensuing  
20 discussions with the subpoenaed parties about the scope or timing of the requested production. It  
21 also means that the Receiver has had to recreate accounting records by reconstructing the entity's  
22 financials using financial statements and offsetting financial records. This process is now complete  
23 and the Receiver has turned his focus towards the claims process and to identifying potential claims  
24 held by the receivership estate against third parties.

25 <sup>4</sup> *SEC v. Capital Consultants, LLC*, 397 F.3d 733, 738 (9th Cir. 2005) (citations omitted); *see also*  
26 *CFTC v. Topworth Int'l, Ltd.*, 205 F.3d 1107, 1115 (9th Cir. 1999) ("This court affords 'broad  
27 deference' to the court's supervisory role, and 'we generally uphold reasonable procedures  
28 instituted by the district court that serve th[e] purpose of orderly and efficient administration of  
the receivership for the benefit of creditors.'").

<sup>5</sup> *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d  
922 (11th Cir. 1993)).

<sup>6</sup> *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973).

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1 The foregoing highlights some of the actions the Receiver and his legal professionals have  
2 been constrained to undertake early in this case and which drives their fees. That said, the  
3 Receiver’s prompt action in reconstructing Profit Connect's financial records assisted in his  
4 preservation and marshalling of Profit Connect property, including over \$9 million dollars in cash  
5 and equivalents and a recovery of more than \$9 million in personal property assets.

6 Below is a description of the services provided by each of the professionals during the  
7 Application Period. All of the fees and expenses incurred during the Application Period will  
8 benefit the receivership estate moving forward.

9 **a. The Receiver**

10 [Fees of \$59,723.50 and costs of \$1,660.89]

11 Pursuant to paragraph X of the Receiver Order, the Receiver was empowered and tasked  
12 with a broad range of authority, including the authority to take possession and control of all assets,  
13 to assume full control of Profit Connect, to have control of and be added as the sole authorized  
14 signatory for all accounts, to conduct an investigation and discovery necessary to locate and  
15 account for assets, to assess the viability and profitability of Profit Connect, to take action  
16 necessary to preserve and prevent the disposition, concealment, or dissipation of assets, to employ  
17 professionals, to make an accounting, to make payments and disbursements, to investigate and  
18 prosecute claims, to engage in litigation to preserve or recover assets or to carry out the Receiver's  
19 mandate, and to have access to all mail and electronic mail.

20 Pursuant to the Receiver Order, the Receiver and his team performed the following duties  
21 during the Application Period:

- 22 • Continued review and analysis of documents and materials retrieved to for third  
23 party;
- 24 • Continued to review documents and interview parties to determine potential litigation  
25 against third parties;
- 26 • Created third party recovery letters for former employees who received funds or gifts  
27 from Profit Connect in excess of their W-2;
- 28

- 1 • Continued efforts with Texas litigation counsel to pursue actions against certain
- 2 agents of Profit Connect;
- 3 • Worked with real estate broker to determine best strategy for Searchlight parcels;
- 4 • Evaluated offers on the Searchlight parcels;
- 5 • Completed reconveyances of investor liens;
- 6 • Completed review and analysis of the accounting file to determine the recommended
- 7 type of claims process;
- 8 • Worked with Kurtzman Carson Consultants and counsel to create the claims process
- 9 and;
- 10 • Created drafts of the digital and paper claims form.

11 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	23.50	\$340.00	\$7,990.00
John Hall	Accountant	49.20	\$310.00	\$15,252.00
Milana Barkhanoy	Associate	1.50	\$255.00	\$382.50
Josh McGraw	Associate	87.20	\$255.00	\$22,236.00
Amanda Deering	Associate	18.90	\$225.00	\$4,252.50
Maggie Chavez	Associate	2.70	\$215.00	\$580.50
Anne Priebe	Associate	9.10	\$215.00	\$1,956.50
Phil Chen	Associate	32.90	\$215.00	\$7,073.50
<b>Total</b>				<b>\$59,723.50</b>

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25 Due to its broad range of experience and expertise, AFS performs almost all required work  
26 in-house, saving both time and money, including tasks involving corporate accounting, forensic  
27 accounting, case administration, claims administration, asset valuation, investor communication  
28 and internet technology. AFS's billing philosophy is to leverage work down to the staff member  
with the lowest bill rate that also has the skills and experience necessary to complete the task. This

1 allows AFS to minimize the cost to complete all work associated with the case, ensuring a  
2 maximum return to stakeholders involved in the matter while also preserving the quality of our  
3 work product. AFS does not bill for travel time in regulatory cases.

4 AFS's rates include a 15 percent discount off its already discounted hourly rates for  
5 government matters and will not increase for the pendency of the case. Both the standard regulatory  
6 rate and the discounted regulatory rate reflect a significant discount off our standard consulting  
7 rates.

8 All billing standards meet or exceed the SEC's Billing Instructions for Receivers in Civil  
9 Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S.  
10 Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of  
11 Expenses.

12 This Application reflects the Receiver's anticipated drop in the number of hours required  
13 to manage this case with the forensic accounting now complete.

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

<i>Category</i>	<i>Total Cost</i>
Airfare	\$609.43
Courier/Shipping	\$ 25.49
Document and Asset Storage	\$639.24
Hotel	\$347.10
Internet/Online Fees	\$39.63
<b><i>Total</i></b>	<b><i>\$1,660.89</i></b>

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

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1 The Receiver also anticipates a significant drop in the expenses required to manage this  
2 case dues to the sale of the personal property, closure of the business, and the turn-over of the  
3 warehouse location to the landlord as less travel will be necessary.

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

6 **b. Greenberg Traurig**

7 [Fees of \$12,038.53 in fees and \$1,279.72 in costs]

8 During the Application Period, Greenberg Traurig (“GT”) assisted with: (1) tracking  
9 subpoenaed documents; (2) monitoring matters involving Roshak settlement compliance;  
10 (3) analyzing issues relating to third party claims and ancillary proceedings; (4) commencing  
11 efforts to have liens released; and (5) assisting the Receiver’s teams with reporting obligations.

12 Greenberg Traurig and Smiley Wang-Ekvall continue to coordinate their efforts to avoid any  
13 duplication of services.

14 GT has discounted their standard fees by 15%, and for Quarter 1 of 2023, seeks \$12,038.53  
15 in discounted fees and costs of \$1,279.72 related to the preparation and recording of  
16 reconveyances.

17 Greenberg Traurig’s invoices are included with the Declaration of Kara Hendricks attached  
18 as **Exhibit 2**.

19 **c. Smiley Wang-Ekvall**

20 [Fees of \$9,588.85 and costs of \$88.13]

21 During the Application Period, Smiley Wang-Ekvall performed a number of different  
22 services from Greenberg Traurig that benefited the estate, including: (1) communicating with  
23 counsel for Bank of America regarding the remainder of its document production; (2) revising the  
24 petition filed by Texas counsel regarding a Profit Connect agent; (3) preparing a memorandum  
25 regarding evidence that may support a claim against a financial institution; (4) reviewing evidence  
26 to support clawback actions against certain employees; (5) preparing the status report; and (6)  
27 formulating the claim procedures and beginning preparation of the motion to approve them.

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1 The Receiver's primary counsel from Smiley Wang-Ekvall billed \$6,747.30 in fees. An  
2 associate was utilized to prepare the first draft of the claims procedure motion, billing \$2,751.45  
3 in fees. A paralegal billed \$90.10 in fees. These fees reflect a 15% discount off of the standard  
4 hourly rates.

5 Smiley Wang-Ekvall's invoices are included with the Declaration of Kyra Andrassy  
6 attached as Exhibit 3.

7 **e. Technology Concepts & Design, Inc.**

8 [Fees of \$58.50 and Licensing and Hosting Costs of \$25,807.80]

9 Technology Concepts & Design, Inc. ("TCDI") provides eDiscovery services to the  
10 Receiver, hosting all of the electronic data on the Relativity platform which is searchable and  
11 makes locating relevant information significantly easier and more cost-effective. During the  
12 Application Period and because of the size of the data being hosted, TCDI charged hosting fees of  
13 \$24,219.30 and license fees of \$1,530.00. It assisted with some searches of the data and incurred  
14 fees of \$58.50 in connection with those services.

15 TCDI's invoices are attached to the Declaration of Ericka Browne attached as Exhibit 4.

16 **f. Baker Tilly**

17 [Fees of \$429.50 and expenses of \$4.60]

18 During the Application Period, Baker Tilly did a modest amount of work primarily of a tax  
19 planning nature, including preliminary tax discussions and preparation of the extension request for  
20 the 2022 return. Baker Tilly billed a total of \$429.50 in fees for 1.2 hours of work.

21 Baker Tilly's invoice is attached to the Declaration of Stacy Chiang attached as Exhibit 5.

22 **IV. CONCLUSION**

23 Based on the foregoing and pursuant to Section X.G. of the Receiver Order, the Receiver  
24 and his professionals request entry of an order:<sup>7</sup>

25 (1) Allowing the Receiver \$59,723.50 in fees and \$1,660.89 in costs for the  
26 Application Period;

27

28 <sup>7</sup> The form of the order is attached as Exhibit 6.

- 1 (2) Allowing Greenberg Traurig \$12,038.53 in fees and \$1,279.72 in costs for the
- 2 Application Period;
- 3 (3) Allowing Smiley Wang-Ekvall, LLP \$9,588.85 in fees and costs of \$88.13 for the
- 4 Application Period;
- 5 (5) Allowing TCDI fees of \$58.50 and expenses of \$25,807.80 for the Application
- 6 Period;
- 7 (6) Allowing Baker Tilly \$429.50 in fees and expenses of \$4.60 for the Application
- 8 Period;
- 9 (7) Authorizing the Receiver to pay 80% of the allowed fees and 100% of the allowed
- 10 costs from funds on hand in the receivership estate; and
- 11 (8) Granting such other and further relief as the Court deems just and
- 12 appropriate.

13 Dated: June 9, 2023

14 SMILEY WANG-EKVALL, LLP

15 By: /s/ Kyra E. Andrassy  
 16 Kyra E. Andrassy, Esq.  
 (Admitted *Pro Hac Vice*)  
 17 3200 Park Center Drive, Suite 250  
 Costa Mesa, California 92626

18 -and-

19 Kara B. Hendricks, Esq.  
 Nevada Bar No. 07743  
 20 GREENBERG TRAURIG, LLP  
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 22 *Attorneys for Receiver*

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# EXHIBIT "1"

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

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE  
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF GEOFF WINKLER  
IN SUPPORT OF APPLICATION FOR  
ALLOWANCE AND PAYMENT OF FEES  
AND COSTS OF THE RECEIVER AND  
HIS PROFESSIONALS FOR THE  
PERIOD FROM JANUARY 1, 2023,  
THROUGH MARCH 31, 2023**

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23 I, Geoff Winkler, declare as follows:

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

26 2. I am competent to testify to the matters presented in this declaration, and I submit  
27 this declaration in support of my application for approval of the fees and costs of my firm and  
28 my professionals in connection with Profit Connect Wealth Services, Inc. This declaration is

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1 based on my personal knowledge, except where made on information and belief, and as to those  
2 matters, I believe them to be true.

3 3. On August 6, 2021, on stipulation of the parties, the Court appointed me as the  
4 permanent receiver of Profit Connect Wealth Services, Inc. and any of its subsidiaries and  
5 affiliates (“Profit Connect”). This fee application covers the period from January 1, 2023,  
6 through March 31, 2023 (the “Application Period.”)

7 4. Attached to this declaration is a true and correct copy of the invoice for my  
8 services and the services of my team at AFS for the Application Period, along with the  
9 Standardized Fund Accounting Report.

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

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

16 7. 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 8. 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 rendered.  
20 The firm’s computer billing system automatically multiplies the time expended by each  
21 professional by the respective professional's billing rate to calculate the amount of the fee. The  
22 firm conducts its business in reliance on the accuracy of such business records.

23 9. As reflected in the attached invoice, pursuant to the Receivership Order, my team  
24 and I performed the following duties during the Application Period:

- 25 • Continued review and analysis of documents and materials retrieved to for third
- 26 party;
- 27 • Continued to review documents and interview parties to determine potential litigation
- 28 against third parties;

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- 1 • Created third party recovery letters for former employees who received funds or gifts
- 2 from Profit Connect in excess of their W-2;
- 3 • Continued efforts with Texas litigation to pursue actions against certain agents of
- 4 Profit Connect;
- 5 • Worked with real estate broker to determine best strategy for Searchlight parcels;
- 6 • Evaluated offers on the Searchlight parcels;
- 7 • Completed reconveyances of investor liens;
- 8 • Completed review analysis of the accounting file to determine the recommended type
- 9 of claims process;
- 10 • Worked with KCC and counsel to create the claims process and;
- 11 • Created drafts of the digital and paper claims form.

12 10. Due to its broad range of experience and expertise, AFS performs almost all  
13 required work in-house, saving both time and money, including tasks involving corporate  
14 accounting, forensic accounting, case administration, claims administration, asset valuation,  
15 investor communication and internet technology.

16 11. AFS's billing philosophy is to leverage work down to the staff member with the  
17 lowest bill rate that also has the skills and experience necessary to complete the task. This  
18 allows AFS to minimize the cost to complete all work associated with the case, ensuring a  
19 maximum return to stakeholders involved in the matter while also preserving the quality of our  
20 work product. AFS does not bill for travel time in regulatory cases.

21 12. AFS's rates include a 15 percent discount off its already discounted hourly rates  
22 for government matters and will not increase for the pendency of the case. Both the standard  
23 regulatory rate and the discounted regulatory rate reflect a significant discount off our standard  
24 consulting rates.

25 13. All billing standards meet or exceed the Billing Instructions for Receivers in Civil  
26 Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S.  
27 Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of  
28 Expenses.

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

15. As of March 31, 2023, I was holding approximately \$9,007,925.89 in cash belonging to Profit Connect.

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

Executed on June 9, 2023.

/s/ Geoff Winkler

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**ATTACHMENT**



## STANDARDIZED FUND ACCOUNTING REPORT for SEC v. Profit Connect Wealth Services, Inc. et al.

Receivership; Civil Docket No. 2:21-cv-01298-JAD-BNW

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):	9,100,833.60		
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	-		
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	7,500.00		
Line 8	Miscellaneous - Other	-		
	<b>Total Funds Available (Lines 1 - 8):</b>		7,500.00	<b>9,108,333.60</b>
	<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	(91,771.06)		
Line 10b	Business Asset Expenses	(8,636.65)		
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>		(100,407.71)	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments		-	
	<b>Total Disbursements for Receivership Operations</b>			<b>(100,407.71)</b>
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>		-	
	<b>Total Disbursements for Distribution Expenses Paid by the Fund</b>			<b>-</b>
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	-		
Line 12b	Federal Tax Payments	-		
	<b>Total Disbursements to Court/Other:</b>		-	
	<b>Total Funds Disbursed (Lines 9 - 11):</b>			<b>(100,407.71)</b>
Line 13	Ending Balance (As of 03/31/2023):			<b>9,007,925.89</b>
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		9,007,925.89	
Line 14b	Investments		-	
Line 14c	Other Assets or Uncleared Funds		8,636,000.00	
	<b>Total Ending Balance of Fund - Net Assets</b>			<b>17,643,925.89</b>

**STANDARDIZED FUND ACCOUNTING REPORT for SEC v. Profit Connect Wealth Services, Inc. et al.**  
 Receivership; Civil Docket No. 2:21-cv-01298-JAD-BNW  
 Reporting Period from 01/01/2023 to 03/31/2023

<b>OTHER SUPPLEMENTAL INFORMATION:</b>				
		<b>Detail</b>	<b>Subtotal</b>	<b>Grand Total</b>
<b>Line 15</b>	<b>Disbursements for Plan Administration Expenses Not Paid by the Fund:</b>			
<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	-		
	<b>Total Plan Development Expenses Not Paid by the Fund</b>	-	-	
<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	-		
	<b>Total Plan Implementation Expenses Not Paid by the Fund</b>	-	-	
<i>Line 15c</i>	<i>Tax Administrator Fees &amp; Bonds Not Paid by the Fund</i>			
	<b>Total Disbursements for Plan Administration Expenses Not Paid by the Fund</b>			-
<b>Line 16</b>	<b>Disbursements to Court/Other Not Paid by the Fund</b>			
<i>Line 16a</i>	<i>Investment Expenses/CRIS Fees</i>		-	
<i>Line 16b</i>	<i>Federal Tax Payments</i>		-	
	<b>Total Disbursements to Court/Other Not Paid by the Fund:</b>			-
<b>Line 17</b>	<b>DC &amp; State Tax Payments</b>			-
<b>Line 18</b>	<b>No. of Claims:</b>			
<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>	-		
<b>Line 19</b>	<b>No. of Claimants/Investors:</b>			
<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, Profit Connect Wealth Services, Inc.**

**Date: April 28, 2023**

SEC v. Profit Connect Wealth Services, Inc. et al.  
 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	Preparing status report.	1/1/2023	0.5	225.00	112.50	Legal - Case Administration
Amanda Deering	Discussing financial statements for status reports with JPM.	1/3/2023	0.1	225.00	22.50	Financial - Status Reports
Josh McGraw	Discussing financial statements for status reports with AMD.	1/3/2023	0.1	255.00	25.50	Financial - Status Reports
Amanda Deering	Discussing investor communication with JPM.	1/3/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Discussing status report with JPM.	1/3/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Email to KH and JdC re: status report litigation updates.	1/3/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Reviewing email from KH re: litigation update for status report.	1/3/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Updating Status Report with litigation update.	1/3/2023	0.3	225.00	67.50	Legal - Case Administration
Josh McGraw	Discussing status report with AMD.	1/3/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Discussing case updates for status report with JBH.	1/4/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Drafting status report.	1/4/2023	0.2	225.00	45.00	Legal - Case Administration
John Hall	Discussing case updates for status report with AMD.	1/4/2023	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Email to RP, KH and KA re: counsel meeting.	1/4/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to JBH re: claim process and meeting to discuss outstanding items.	1/4/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Geoff Winkler	Call with JPM re: claimant contact information.	1/5/2023	0.1	340.00	34.00	Legal - Claims Administration and Objections
Josh McGraw	Call with GBW re: claimant contact information.	1/5/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
John Hall	Troubleshooting accounting issues with potential third party calculations.	1/6/2023	1.2	310.00	372.00	Financial - Accounting/Auditing
Josh McGraw	Reviewing email from KH re: recorders' office response on property lien.	1/6/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Updating claims investor list to incorporate pertinent information for the claims process.	1/6/2023	0.6	255.00	153.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing bill from RP and emailing RP for additional information.	1/9/2023	0.1	255.00	25.50	Financial - Accounting/Auditing
Amanda Deering	Meeting to discuss investor communication, status report and confirmation of requested documents with MCC, GBW, JBH, MBB, AMP, JPM.	1/9/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Meeting with MBB, MCC, AMD, JPM, GBW, JBH re: appeal and claims process.	1/9/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Meeting with MBB, MCC, AMD, JPM, AMP, JBH re: appeal and claims process.	1/9/2023	0.1	340.00	34.00	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and confirmation of requested documents with MCC, GBW, AMD, MBB, AMP.	1/9/2023	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and confirmation of requested documents with MCC, GBW, JBH, MBB, AMP.	1/9/2023	0.1	255.00	25.50	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	215.00	21.50	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and confirmation of requested documents with MCC, GBW, JBH, JBH, AMP, AMD.	1/9/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Review claim form and provide needed updates.	1/9/2023	1.0	310.00	310.00	Legal - Claims Administration and Objections
John Hall	Review potential recovery flows and assemble schedules to discuss feasibility with JPM (1.2). review associated staff work product (1.7).	1/10/2023	2.9	310.00	899.00	Legal - Asset Analysis and Recovery
John Hall	Review and update proposed claim form and associated instructions.	1/10/2023	0.9	310.00	279.00	Legal - Claims Administration and Objections
Josh McGraw	Updating claims list with missing information.	1/10/2023	0.6	255.00	153.00	Legal - Claims Administration and Objections
Geoff Winkler	Reconcile accounts, work through wire issue, work with financial institutions.	1/11/2023	0.6	340.00	204.00	Financial - Accounting/Auditing
Geoff Winkler	Review banking transactions, email with bank re: wire transfer clearance.	1/11/2023	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Review invoices, emails with vendor.	1/11/2023	0.3	340.00	102.00	Financial - Accounting/Auditing
Amanda Deering	Preparing ledger for status report.	1/11/2023	0.3	225.00	67.50	Financial - Status Reports
John Hall	Meeting with JPM re: third-party recovery review and recovery plan.	1/11/2023	0.7	310.00	217.00	Legal - Asset Analysis and Recovery
Josh McGraw	Meeting with JBH re: third-party recovery review and recovery plan.	1/11/2023	0.7	255.00	178.50	Legal - Asset Analysis and Recovery
Amanda Deering	Updating investor communication with AMP as requested by JPM.	1/11/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Updating investor communication with AMD as requested by JPM.	1/11/2023	0.1	215.00	21.50	Legal - Case Administration
John Hall	Discussing case tax strategy with MBB, SC and EC from BT.	1/11/2023	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Communication with AMD and AMP to update investor communication.	1/11/2023	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Discussing case tax strategy with JBH, SC and EC from BT.	1/11/2023	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Discussing case tax strategy with SC and EC from BT.	1/11/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Meeting with JPM re: claims form review and discussion on claims process.	1/11/2023	0.7	310.00	217.00	Legal - Claims Administration and Objections

SEC v. Profit Connect Wealth Services, Inc. et al.  
 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	Meeting with JBH re: claims form review and discussion on claims process.	1/11/2023	0.7	255.00	178.50	Legal - Claims Administration and Objections
Geoff Winkler	Review invoice from litigation counsel, discuss with counsel.	1/12/2023	0.2	340.00	68.00	Legal - Case Administration
Amanda Deering	Email to JPM and JD re: claimant entries in KCC.	1/12/2023	0.1	225.00	22.50	Legal - Claims Administration and Objections
Josh McGraw	Email to AMD and JD re: claimant entries in KCC.	1/12/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Email to JE and AMD re: claims management meeting with KCC.	1/12/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Reviewing email from AMD re: claimant entries in KCC.	1/12/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
John Hall	Review claims and third party issues in accounting and bank record documentation.	1/16/2023	0.4	310.00	124.00	Legal - Asset Analysis and Recovery
John Hall	Team call to discuss claims and third party issues with JPM, GBW, KA, J. Paul.	1/16/2023	0.6	310.00	186.00	Legal - Case Administration
Josh McGraw	Reviewing lien documentation to respond to counsel request.	1/17/2023	0.3	255.00	76.50	Financial - Data Analysis
	Review accounting records on third parties, research NV SOS on various entities for ownership. Discuss needed next steps with GBW (2.8). Review employee recovery issues with GBW (.4).	1/17/2023	3.2	310.00	992.00	Legal - Asset Analysis and Recovery
John Hall	Call with claimant re: start of the claims process.	1/17/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Calls with investors re: updates on the claims process, the case, and confirming their investment amount.	1/17/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to KH re: summary of documentation for lien identified and email confirmation.	1/17/2023	0.2	255.00	51.00	Legal - Case Administration
John Hall	Review and discuss RLP draft petition with GBW.	1/18/2023	0.4	310.00	124.00	Legal - Case Administration
Josh McGraw	Email to RP re: additional information requested for the invoice.	1/18/2023	0.1	255.00	25.50	Legal - Case Administration
	Meeting with KH, KA, JM, and RP re: third party recover, claims process, and assets of the estate.	1/18/2023	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Reviewing invoice support from RP.	1/18/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Discussing status report with JPM.	1/19/2023	0.1	225.00	22.50	Financial - Status Reports
Josh McGraw	Discussing status report with AMD.	1/19/2023	0.1	255.00	25.50	Financial - Status Reports
Josh McGraw	Call with JD re: Searchlight properties.	1/19/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing marketing for Searchlight parcels, listings on loopnet and confirming pricing.	1/19/2023	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing offer provided by broker for Searchlight parcels.	1/19/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Updating structure of the third-party recovery list based on guidance from KA and KH.	1/19/2023	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with investor re: claims process and distribution timeline.	1/19/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with investor re: claims process.	1/19/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with investor re: update on claims process and distribution timeline.	1/19/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with investor re: setting up a time to discuss the case.	1/19/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Updating draft of claims form.	1/19/2023	0.7	255.00	178.50	Legal - Claims Administration and Objections
Josh McGraw	Email to TW re: offer received and marketing strategy of Searchlight parcels.	1/20/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with claimant re: claims process and distribution timeline.	1/20/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to claimant re: request for an update on their investment.	1/20/2023	0.1	255.00	25.50	Legal - Case Administration
	Preparing and editing application schedule and attachments, reviewing staff entries for accuracy. Draft to GBW.	1/21/2023	4.0	310.00	1,240.00	Financial - Status Reports
John Hall	Making updates to report items per GBW request, forwarding final draft to counsel for submission.	1/22/2023	0.5	310.00	155.00	Financial - Status Reports
John Hall	Giving status report update to GBW and JBH.	1/23/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Updating weekly meeting agenda.	1/23/2023	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Status report update with AMD.	1/23/2023	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Review of documentation provided by KA from production request.	1/23/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewing draft petition from JPM and RP.	1/23/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to JBH and GBW re: draft claims form.	1/23/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Updating claims form prior to sending the second draft.	1/23/2023	0.4	255.00	102.00	Legal - Claims Administration and Objections
Amanda Deering	Preparing the status report cash flow and balance sheet.	1/24/2023	0.5	225.00	112.50	Financial - Status Reports

SEC v. Profit Connect Wealth Services, Inc. et al.  
 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	Updating the exhibits for status report.	1/24/2023	0.2	255.00	51.00	Financial - Status Reports
John Hall	Call with JPM re: asset management.	1/24/2023	0.1	310.00	31.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with JBH re: asset management.	1/24/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with MBB re: asset management and updates within KCC.	1/24/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with MBB re: asset estimates.	1/24/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Updating assets in KCC.	1/24/2023	0.7	255.00	178.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Call with JPM re: asset management and updates within KCC.	1/24/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication with JPM re: asset estimates.	1/24/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Amanda Deering	Email to JPM re: status report next steps.	1/24/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Email to KH re: status report.	1/24/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Updating the status report.	1/24/2023	0.5	225.00	112.50	Legal - Case Administration
Josh McGraw	Drafting status report.	1/25/2023	1.7	255.00	433.50	Financial - Status Reports
Amanda Deering	Reviewing status report with JPM.	1/25/2023	0.5	225.00	112.50	Legal - Case Administration
Josh McGraw	Reviewing status report with AMD.	1/25/2023	0.5	255.00	127.50	Legal - Case Administration
Amanda Deering	Discussing with AMP and JPM re: claimants list.	1/25/2023	0.3	225.00	67.50	Legal - Claims Administration and Objections
Anna Priebe	Discussing with JPM and AMD re: claimants list.	1/25/2023	0.3	215.00	64.50	Legal - Claims Administration and Objections
John Hall	Meeting with JPM re: claims discussion and process conversation to obtain approval.	1/25/2023	0.4	310.00	124.00	Legal - Claims Administration and Objections
Josh McGraw	Discussing with AMP and AMD re: claimants list.	1/25/2023	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Meeting with JBH re: claims discussion and process conversation to obtain approval.	1/25/2023	0.4	255.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Call with investor re: update on the distribution timeline.	1/26/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to KH and KA re: draft of the status report and exhibits.	1/27/2023	0.1	255.00	25.50	Financial - Status Reports
Amanda Deering	Discussing invoice concern with AMP.	1/27/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Discussing status report updates with JPM.	1/27/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Call with TCDI re: outstanding statements.	1/27/2023	0.2	215.00	43.00	Legal - Case Administration
Anna Priebe	Email GBW re: statements.	1/27/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Email TDCI re: statements.	1/27/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Reviewing invoices from TCDI.	1/27/2023	0.1	215.00	21.50	Legal - Case Administration
Josh McGraw	Discussing status report updates with AMD.	1/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KH and KA re: draft claims form.	1/27/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Updating claims form and reviewing prior to sending to counsel.	1/27/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Geoff Winkler	Review draft status report, discussion re: claims process.	1/30/2023	0.3	340.00	102.00	Financial - Status Reports
Josh McGraw	Email to KH re: language for claim process in status report.	1/30/2023	0.1	255.00	25.50	Financial - Status Reports
Geoff Winkler	Review credit card payment information, discussion with counsel.	1/30/2023	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting to discuss investor communication, status report and confirmation of requested documents with MCC, GBW, JBH, MBB, AMP, JPM.	1/30/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Meeting with AMP and JPM to discuss operations and investor communication needs and next steps.	1/30/2023	0.3	225.00	67.50	Legal - Case Administration
Anna Priebe	Meeting with JPM and AMD re: investor communication and high priority asset management.	1/30/2023	0.3	215.00	64.50	Legal - Case Administration
Anna Priebe	Team meeting re: case updates and claims process.	1/30/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Review invoice and email with SK.	1/30/2023	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Team meeting re: case updates and claims process.	1/30/2023	0.1	340.00	34.00	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	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication, status report and confirmation of requested documents with MCC, GBW, JBH, MBB, AMP, AMD.	1/30/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMP and AMD to discuss operations and investor communication needs and next steps.	1/30/2023	0.3	255.00	76.50	Legal - Case Administration

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 January 1, 2023 - March 31, 2023  
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Maggie Chavez	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MBB, AMP, JPM.	1/30/2023	0.1	215.00	21.50	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	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review draft claim form, comments with team.	1/30/2023	0.3	340.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Email to KH re: exhibits for the status report.	1/31/2023	0.1	255.00	25.50	Financial - Status Reports
Geoff Winkler	Review email from JBH re: payments to financial institutions.	1/31/2023	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
John Hall	Review and comment on RLP draft petition, discuss with GBW.	1/31/2023	0.9	310.00	279.00	Legal - Asset Analysis and Recovery
Amanda Deering	Discussion re: investor communication with AMP.	1/31/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Call with AMD re: investor communication.	1/31/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Discussion with SK re: transition.	1/31/2023	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Emails with counsel KA re: report filing and timing.	1/31/2023	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Review notification requirements, research total number of contacts with details, report to counsel.	1/31/2023	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Email to KH re: review and approval of letter on lien verification.	1/31/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing a letter to an investor regarding a lien on property.	1/31/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Discuss claims process and format with JBH.	1/31/2023	0.3	340.00	102.00	Legal - Claims Administration and Objections
John Hall	Review claims process methodology with GBW, memo to MS at KCC re: technology needs.	1/31/2023	0.6	310.00	186.00	Legal - Claims Administration and Objections
Josh McGraw	Request for a report on CC.	2/1/2023	0.1	255.00	25.50	Financial - Data Analysis
Josh McGraw	Reviewing documentation on Westwing LLC and creating a summarization for KA and KH.	2/1/2023	0.8	255.00	204.00	Financial - Data Analysis
Geoff Winkler	Review EK issue re WW entity, potential recovery.	2/1/2023	0.4	340.00	136.00	Legal - Asset Analysis and Recovery
John Hall	Review materials on Westwing LL from JPM, additional accounting research and SOS search re: same.	2/1/2023	0.7	310.00	217.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting to discuss claims and third party issues with KA, JPM, J. Paul (left call early).	2/1/2023	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Review draft petition, discuss with counsel KH.	2/1/2023	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Review question from JK, review records, respond re documents needed.	2/1/2023	0.3	340.00	102.00	Legal - Case Administration
John Hall	Meeting to discuss claims and third party issues with KA, JPM, GBW, J. Paul.	2/1/2023	0.6	310.00	186.00	Legal - Case Administration
John Hall	Review request from JEK, discuss with GBW, and respond with memo re: same.	2/1/2023	0.7	310.00	217.00	Legal - Case Administration
John Hall	Subject research and pull report for JPM.	2/1/2023	0.5	310.00	155.00	Legal - Case Administration
Josh McGraw	Email to JBH re: request for background check on CC.	2/1/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KA and KH re: Westwing LLC.	2/1/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting to discuss claims and third party issues with KA, JBH, GBW, J. Paul.	2/1/2023	0.6	255.00	153.00	Legal - Case Administration
Anna Priebe	Call with investor.	2/2/2023	0.3	215.00	64.50	Legal - Case Administration
Anna Priebe	Messages with JPM re: investor communication.	2/2/2023	0.2	215.00	43.00	Legal - Case Administration
Anna Priebe	Reviewed investor list for email confirmation.	2/2/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Review updated draft, notes to counsel.	2/2/2023	0.2	340.00	68.00	Legal - Case Administration
John Hall	Review draft petition and KA edits and revisions re: same. Discuss with GBW for needed edits.	2/2/2023	0.9	310.00	279.00	Legal - Case Administration
Josh McGraw	Email to EE re: filed pleadings.	2/2/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Messages with AMP re: investor communication.	2/2/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Uploading court filings to the website and sending email service to investors and creditors.	2/2/2023	0.4	255.00	102.00	Legal - Case Administration
Amanda Deering	Updating weekly meeting agenda.	2/3/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Call with JPM re: investor list and registration confirmation.	2/3/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Call with VA to discuss status, timing.	2/3/2023	0.3	340.00	102.00	Legal - Case Administration
John Hall	Review and request access to daily pleading updates from KAE.	2/3/2023	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Call with AMP re: investor list and registration confirmation.	2/3/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Communication with GBW, JD and KH re: Searchlight property.	2/6/2023	0.1	225.00	22.50	Legal - Asset Analysis and Recovery

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 (Sorted in Chronological Order by Activity Category)

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Amanda Deering	Communication with JPM re: broker analysis of land parcels.	2/6/2023	0.1	225.00	22.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with AMD, JD and KH re: Searchlight property.	2/6/2023	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with AMD re: broker analysis of land parcels.	2/6/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JD re: Searchlight parcels.	2/6/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, JPM.	2/6/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MCC, MBB, JPM.	2/6/2023	0.1	215.00	21.50	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	310.00	31.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, AMD.	2/6/2023	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.	2/6/2023	0.1	215.00	21.50	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MCC, AMP, JPM.	2/6/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Meeting with KCC, JBH and AMP re: claims administration process.	2/6/2023	0.4	225.00	90.00	Legal - Claims Administration and Objections
Anna Priebe	Meeting with AMD, JBH, and KCC re: building claims platform.	2/6/2023	0.3	215.00	64.50	Legal - Claims Administration and Objections
John Hall	Meeting with KCC development team, AMD and AMP to discuss launching the technical side of claims process (.3), follow up discussion with GBW re: same (.2).	2/6/2023	0.5	310.00	155.00	Legal - Claims Administration and Objections
John Hall	Preparation for claims meeting, review case needs, compile draft claims forms and motions (1.5); review accounting file to scope claims needs (.5).	2/6/2023	2.0	310.00	620.00	Legal - Claims Administration and Objections
John Hall	Review accounting file and schedules for third party recovery; compile and pull files on potential subjects, discussion with GBW and staff re: same.	2/7/2023	2.5	310.00	775.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with JD re: Searchlight properties and marketing ideas.	2/7/2023	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with investor/promoter re status of case.	2/8/2023	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Call with third party re: claims process updates for their client and estimation for estate planning.	2/8/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to investor re: update on the receivership process.	2/8/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Conversation with JPM re: KCC claims meeting and next steps in the process.	2/8/2023	0.1	310.00	31.00	Legal - Claims Administration and Objections
Josh McGraw	Conversation with JBH re: KCC claims meeting and next steps in the process.	2/8/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Amanda Deering	Communication with JPM and AMP re: claims form review.	2/9/2023	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Comparing claim form templates.	2/9/2023	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Preparing status report.	2/9/2023	0.3	225.00	67.50	Legal - Case Administration
Anna Priebe	Preparation of physical notice to investor.	2/9/2023	0.3	215.00	64.50	Legal - Case Administration
Josh McGraw	Email to AMP re: sending documents to investor per request.	2/9/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors re: questions about third-party recovery and claims process.	2/9/2023	0.5	255.00	127.50	Legal - Case Administration
Amanda Deering	Discussing claim form comparison with JPM.	2/9/2023	0.2	225.00	45.00	Legal - Claims Administration and Objections
Anna Priebe	Review of templates for claims distribution.	2/9/2023	0.2	215.00	43.00	Legal - Claims Administration and Objections
John Hall	Provide draft POC to KCC and review four model sites, provide feedback.	2/9/2023	1.2	310.00	372.00	Legal - Claims Administration and Objections
Josh McGraw	Discussing claim form comparison with AMD.	2/9/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Email to KH, KA, GBW, JBH re: second draft of claims form.	2/9/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Reviewing AMP and AMD: comments on KCC claims websites.	2/9/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing claims websites provided by KCC.	2/9/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Updating claims form incorporating revisions from counsel and GBW. Adjusting the structure of the form for ease of use.	2/9/2023	2.1	255.00	535.50	Legal - Claims Administration and Objections
Geoff Winkler	Review claims process and potential third party list.	2/10/2023	0.7	340.00	238.00	Legal - Case Administration
Josh McGraw	Email to KH re: status of the release of investor liens.	2/10/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, JPM.	2/13/2023	0.1	225.00	22.50	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Anna Priebe	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MCC, MBB, JPM.	2/13/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Discuss lien release issue for investors with KH and JPM.	2/13/2023	0.2	340.00	68.00	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	310.00	31.00	Legal - Case Administration
Josh McGraw	Discuss lien release issue for investors with KH and GBW.	2/13/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to KH re: timeline for the release of investor liens.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, AMD.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication and confirmation of requested documents with JPM, JBH, MBB, AMP, AMD.	2/13/2023	0.1	215.00	21.50	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MCC, AMP, JPM.	2/13/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Reviewing claims forms with AMP and JPM as requested by JBH.	2/13/2023	0.6	225.00	135.00	Legal - Claims Administration and Objections
Anna Priebe	Reviewing claims forms with AMD and JPM as requested by JBH.	2/13/2023	0.6	215.00	129.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing claims websites from KCC.	2/13/2023	0.4	255.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing claims websites with AMP and AMD as requested by JBH.	2/13/2023	0.6	255.00	153.00	Legal - Claims Administration and Objections
Geoff Winkler	Review PERS delay issue, plan to secure settlement, discuss concerns with counsel.	2/14/2023	0.3	340.00	102.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with KH re investor lien release.	2/14/2023	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Emails to investors re: update on claims process.	2/14/2023	0.3	255.00	76.50	Legal - Case Administration
John Hall	Review past due invoice, confirm with accounting and discuss with GBW for needed remittance.	2/15/2023	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Email to KH re: notary service for lien release documentation.	2/15/2023	0.1	255.00	25.50	Legal - Case Administration
Anna Priebe	Email to JBH, AMD, JPM re: claims mock up.	2/16/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Review of AMD email re: claims form feedback.	2/16/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Reviewing mock up of claims form.	2/16/2023	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Meeting for notary services.	2/16/2023	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Emails with KH re: lien documentation.	2/16/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Reviewing claims form and sending feedback to JBH.	2/16/2023	0.5	225.00	112.50	Legal - Claims Administration and Objections
Josh McGraw	Scrubbing accounting file for missing information for investors and third parties.	2/17/2023	0.8	255.00	204.00	Financial - Data Analysis
Amanda Deering	Communication with JBH re: claims forms.	2/17/2023	0.3	225.00	67.50	Legal - Case Administration
Geoff Winkler	Call with JK re updated information.	2/17/2023	0.2	340.00	68.00	Legal - Case Administration
Milana Barkhanoy	Email from EC re 2022 tax preparation.	2/17/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing communication from AMD, AMP and JBH about the claims process and review of KCC's website.	2/17/2023	0.5	255.00	127.50	Legal - Claims Administration and Objections
Geoff Winkler	Emails with JK re meeting.	2/21/2023	0.1	340.00	34.00	Legal - Case Administration
John Hall	Review outstanding tax issues with MMB.	2/23/2023	0.2	310.00	62.00	Financial - Tax Issues
Geoff Winkler	Call with CB to discuss institutional account.	2/23/2023	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Review property tax and process six payments.	2/24/2023	0.3	340.00	102.00	Financial - Accounting/Auditing
Josh McGraw	Email to GBW re: summary of property taxes due.	2/24/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emailing lien release documents to investor requesting update on the status.	2/24/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing lien release documents.	2/24/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Verifying outstanding property tax liabilities for Searchlight parcels.	2/24/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Identifying missing contact information for third parties.	2/27/2023	1.0	255.00	255.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing title reports and contacting Tigor Title to change address for investor.	2/27/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, JPM and GBW.	2/27/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMD, JPM and GBW.	2/27/2023	0.1	215.00	21.50	Legal - Case Administration



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Geoff Winkler	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMD, AMP and JPM.	2/27/2023	0.1	340.00	34.00	Legal - Case Administration
John Hall	Meeting to discuss investor communication, status report and other case activities with GBW, AMD, MBB, MCC, AMP, JPM.	2/27/2023	0.1	310.00	31.00	Legal - Case Administration
John Hall	Review WP data files compare to distribution list, determine hybrid claims process needs.	2/27/2023	1.4	310.00	434.00	Legal - Case Administration
Josh McGraw	Deduplicate investor list.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call to investor re: lien release documentation.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with CY re: prior lien recording documents.	2/27/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to EE re: notice of service to investors with lien reconveyances.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KN re: recorded lien reconveyance documents.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMD, AMP and GBW.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Preparing lien reconveyance documents to be sent to investors.	2/27/2023	0.4	255.00	102.00	Legal - Case Administration
Maggie Chavez	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MBB, AMP, JPM.	2/27/2023	0.1	215.00	21.50	Legal - Case Administration
Milana Barkhanoy	Meeting to discuss investor communication, status report and other case activities with AMD, GBW, JBH, MCC, AMP, JPM.	2/27/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Email from JBH re: claims administration.	2/27/2023	0.1	225.00	22.50	Legal - Claims Administration and Objections
Anna Priebe	Communication with JPM re: claims processing.	2/27/2023	0.2	215.00	43.00	Legal - Claims Administration and Objections
John Hall	Conversation with JPM re: digital claims form.	2/27/2023	0.1	310.00	31.00	Legal - Claims Administration and Objections
Josh McGraw	Communication with AMP re: claims processing.	2/27/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Conversation with JBH re: digital claims form.	2/27/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Identifying missing contact information and scrubbing claims list to determine if associated parties.	2/27/2023	1.3	255.00	331.50	Legal - Claims Administration and Objections
Josh McGraw	Searching NV Secretary of State for contact information of third parties.	2/28/2023	0.4	255.00	102.00	Financial - Data Analysis
Geoff Winkler	Call with JK to discuss status of third party, discuss interviews, findings.	2/28/2023	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Emails with counsel, KW re time to discuss case status.	2/28/2023	0.1	340.00	34.00	Legal - Case Administration
John Hall	Discuss case updates and SEC needs with GBW.	2/28/2023	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Identifying missing contact information and scrubbing claims list to determine if associated parties.	2/28/2023	1.4	255.00	357.00	Legal - Claims Administration and Objections
Geoff Winkler	Reconcile bank accounts, transactions, look for changes.	3/1/2023	0.2	340.00	68.00	Financial - Accounting/Auditing
John Hall	Review and produce Kovar flows schedule to KW.	3/1/2023	0.9	310.00	279.00	Financial - Accounting/Auditing
Josh McGraw	Creating a schedule of defendant transactions and auditing updates from prior summary.	3/1/2023	1.1	255.00	280.50	Financial - Accounting/Auditing
Amanda Deering	Discussing recovery letter template with JPM.	3/1/2023	0.3	225.00	67.50	Legal - Case Administration
Amanda Deering	Meeting with JPM and AMP to discuss claims process and recovery tasks for the week.	3/1/2023	0.2	225.00	45.00	Legal - Case Administration
Anna Priebe	Meeting with JPM and AMD to discuss claims process and recovery tasks for the week.	3/1/2023	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Discuss case update with KW, KA, HK and JBH- recovery efforts and upcoming claims procedure.	3/1/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Meeting with counsel to discuss potential litigation against financial institutions and professionals.	3/1/2023	1.0	340.00	340.00	Legal - Case Administration
John Hall	Discuss case update with KW, KA, HK and GBW- recovery efforts and upcoming claims procedure.	3/1/2023	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Discussing recovery letter template with AMD.	3/1/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to claimant re: timeline for claims process.	3/1/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to JBH re: defendant transactions.	3/1/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KH, KA, JM and RP re: rescheduling meeting with counsel.	3/1/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMD and AMP to discuss claims process and recovery tasks for the week.	3/1/2023	0.2	255.00	51.00	Legal - Case Administration

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Amanda Deering	Meeting with JPM, AMP and JBH re: claims process.	3/1/2023	1.2	225.00	270.00	Legal - Claims Administration and Objections
Anna Priebe	Meeting with JPM, AMD and JBH re: claims process.	3/1/2023	1.2	215.00	258.00	Legal - Claims Administration and Objections
John Hall	Meet with AMP AMD JPM on claims form finalization, claims process coordination and third party recovery needs.	3/1/2023	1.2	310.00	372.00	Legal - Claims Administration and Objections
Josh McGraw	Email to AMD re: summarization of claims list.	3/1/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Identifying missing contact information and scrubbing claims list to determine if associated parties.	3/1/2023	0.7	255.00	178.50	Legal - Claims Administration and Objections
Josh McGraw	Meet with AMP AMD JBH on claims form finalization, claims process coordination and third party recovery needs.	3/1/2023	1.2	255.00	306.00	Legal - Claims Administration and Objections
Josh McGraw	Summarizing claims form updates and digital requests from KCC.	3/1/2023	0.5	255.00	127.50	Legal - Claims Administration and Objections
John Hall	Review bank statements from BOA.	3/2/2023	0.2	310.00	62.00	Financial - Accounting/Auditing
Josh McGraw	Call with TW re: Searchlight comps, listing price recommendation and discussion on auction timeline.	3/2/2023	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Team call with JBH, JPM, KH, KA to discuss claims and third party recovery	3/2/2023	0.3	340.00	102.00	Legal - Case Administration
John Hall	Team call with GBW, JPM, KH, KA to discuss claims and third party recovery	3/2/2023	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Email to investor re: questions about distribution timeline, claims process and receiver reports.	3/2/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Team call with GBW, JBH, KH, KA to discuss claims and third party recovery.	3/2/2023	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Review accounting question, research payments, emails with SK, JBH.	3/3/2023	0.3	340.00	102.00	Financial - Accounting/Auditing
John Hall	Review SF issues with GBW, pull requested documentation re: same.	3/3/2023	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Email to claimant re: notification of claims process, timeline, and items left to complete.	3/3/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, JPM and GBW.	3/6/2023	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, JPM and AMD.	3/6/2023	0.1	340.00	34.00	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	310.00	31.00	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, AMD and GBW.	3/6/2023	0.1	255.00	25.50	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	215.00	21.50	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss ongoing tasks and review updates. With GBW, AMP, AMD, JPM, JBH, MCC.	3/6/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Reviewing claim form with JPM.	3/6/2023	0.3	225.00	67.50	Legal - Claims Administration and Objections
Anna Priebe	Review of claims form edits by JPM.	3/6/2023	0.2	215.00	43.00	Legal - Claims Administration and Objections
Josh McGraw	Email to AMP and AMD re: updated claims form and notes on items incorporated from meeting.	3/6/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing claim form with AMD.	3/6/2023	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Updating claims form with revisions requested by JBH.	3/6/2023	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Creating support for third party recovery efforts.	3/7/2023	1.6	255.00	408.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing third party recovery letter.	3/7/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Amanda Deering	Call with JPM re: lien reconveyance letters.	3/7/2023	0.3	225.00	67.50	Legal - Case Administration
Amanda Deering	Communication with JPM re: third-party recovery letters.	3/7/2023	0.6	225.00	135.00	Legal - Case Administration
Amanda Deering	Drafting third-party recovery letters.	3/7/2023	0.8	225.00	180.00	Legal - Case Administration
Amanda Deering	Email to JPM re: 3rd party recovery.	3/7/2023	0.1	225.00	22.50	Legal - Case Administration
Geoff Winkler	Review invoice, email with MCC.	3/7/2023	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Call with AMD re: lien reconveyance letters.	3/7/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Communication with AMD re: third-party recovery letters and review draft.	3/7/2023	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Email to AMD re: lien reconveyance documents.	3/7/2023	0.1	255.00	25.50	Legal - Case Administration
Amanda Deering	Call with JPM and AMP re: investor communication and claims process.	3/8/2023	0.2	225.00	45.00	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Amanda Deering	Email to JPM re: lien releases.	3/8/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Preparing letters to investors re: lien releases.	3/8/2023	0.6	225.00	135.00	Legal - Case Administration
Anna Priebe	Call with JPM and AMD re: investor communication and claims process.	3/8/2023	0.2	215.00	43.00	Legal - Case Administration
Josh McGraw	Call with AMD and AMP re: investor communication and claims process.	3/8/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing AMD email re: lien releases.	3/8/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to PCC re: direction for third-party recovery schedules and supporting documents.	3/9/2023	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Meeting with PCC re: third-party recovery schedules and supporting documentation.	3/9/2023	1.0	255.00	255.00	Legal - Asset Analysis and Recovery
Phil Chen	Meeting with JPM re: third-party recovery schedules and supporting documentation.	3/9/2023	1.0	215.00	215.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with JK, research information needed, emails with JPM, JK.	3/9/2023	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Email to GBW re: JK request.	3/9/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Review tax inquiry from EC.	3/10/2023	0.1	310.00	31.00	Financial - Tax Issues
Phil Chen	Third-party recovery schedules and supporting documentation.	3/10/2023	2.0	215.00	430.00	Legal - Asset Analysis and Recovery
John Hall	Review third draft of claim form, with edits and confirm to JPM.	3/10/2023	0.5	310.00	155.00	Legal - Claims Administration and Objections
Josh McGraw	Communication with JBH re: finalizing draft claims form.	3/10/2023	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Email to JA re: changes to digital claims form and additional questions.	3/10/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Updating claims form and restructuring form to accommodate additional information.	3/10/2023	0.6	255.00	153.00	Legal - Claims Administration and Objections
Josh McGraw	Call with PCC re: third party support and schedules.	3/13/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Creating schedules and support for third party recovery.	3/13/2023	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JD re: Searchlight parcels.	3/13/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Phil Chen	Call with JPM re: third party support and schedules.	3/13/2023	0.2	215.00	43.00	Legal - Asset Analysis and Recovery
Phil Chen	Third-party schedules and supporting documentation	3/13/2023	1.2	215.00	258.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: third party recovery schedules and claims.	3/13/2023	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Call with GBW re: third party recovery schedules and claims.	3/13/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Reporting professional time to JBH for February.	3/13/2023	0.3	215.00	64.50	Legal - Case Administration
Anna Priebe	Review of JPM notes for KCC.	3/13/2023	0.1	215.00	21.50	Legal - Claims Administration and Objections
Josh McGraw	Updating third party recovery summary and creating investment schedules for JK.	3/14/2023	1.4	255.00	357.00	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support.	3/14/2023	0.5	215.00	107.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JK to discuss potential third party recovery.	3/14/2023	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: information request from JK.	3/14/2023	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Review former EE payments, potential third party recovery, emails with JPM, email to JK.	3/14/2023	0.9	340.00	306.00	Legal - Case Administration
Geoff Winkler	Review records and pull information needed by JK, review entries for potential third party claims.	3/14/2023	0.8	340.00	272.00	Legal - Case Administration
Josh McGraw	Call with GBW re: information request from JK.	3/14/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with investor re: claims process.	3/14/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to GBW re: summary of requested items for JK.	3/14/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Communication with JPM re: supporting document process.	3/15/2023	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
John Hall	Review draft petition from RLP, discussion with GBW.	3/15/2023	0.3	310.00	93.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with GBW re: supporting document process.	3/15/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with PCC re: third party recovery support and schedules.	3/15/2023	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Josh McGraw	Verifying schedule transactions and pulling supporting documents.	3/15/2023	3.0	255.00	765.00	Legal - Asset Analysis and Recovery
Phil Chen	Communication with JPM re: third-party recovery support and schedules.	3/15/2023	0.5	215.00	107.50	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support	3/15/2023	0.5	215.00	107.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JK to discuss accounting and payroll.	3/15/2023	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Email to KW and TM re planning and upcoming hearing.	3/15/2023	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Emails with JK re BTC recovery, review files, review letter to CB from WR.	3/15/2023	0.3	340.00	102.00	Legal - Case Administration

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Geoff Winkler	Meeting with KH, KA, and JPM re: claims process, third-party recovery, and asset disposition.	3/15/2023	0.8	340.00	272.00	Legal - Case Administration
Geoff Winkler	Research and pull documents related to potential third party recovery against professionals and emails with counsel.	3/15/2023	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Review draft petition and notes with counsel.	3/15/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Review subpoena response from DH and discuss with counsel re potential third party recovery.	3/15/2023	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Meeting with KH, KA, and GBW re: claims process, third-party recovery, and asset disposition.	3/15/2023	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Updating items for upcoming meeting with KH, KA and GBW.	3/15/2023	0.4	255.00	102.00	Legal - Case Administration
Maggie Chavez	Reviewing and indexing physical documents received.	3/15/2023	0.8	215.00	172.00	Legal - Case Administration
Josh McGraw	Email to KA and KH re: claims form for motion.	3/15/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Emails to PCC re: documents needed for third party recovery schedules.	3/16/2023	0.2	255.00	51.00	Financial - Data Analysis
Josh McGraw	Call with PCC re: third party schedules and supporting documentation.	3/16/2023	0.6	255.00	153.00	Legal - Asset Analysis and Recovery
Phil Chen	Call with JPM re: PC's schedules and supporting documentation.	3/16/2023	0.6	215.00	129.00	Legal - Asset Analysis and Recovery
Phil Chen	Third-party recovery schedule and supporting documentation.	3/16/2023	3.5	215.00	752.50	Legal - Asset Analysis and Recovery
Amanda Deering	Operations update and review outstanding tasks with AMP and JPM.	3/16/2023	0.3	225.00	67.50	Legal - Case Administration
Anna Priebe	Investor communication re: latest status report.	3/16/2023	0.7	215.00	150.50	Legal - Case Administration
Anna Priebe	Operations update and review outstanding tasks with AMD and JPM.	3/16/2023	0.3	215.00	64.50	Legal - Case Administration
Geoff Winkler	Review proposed claims procedures motion, notice of bar date and POC form and instructions, edits to counsel, JPM.	3/16/2023	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Operations update and review outstanding tasks with AMP and AMD.	3/16/2023	0.3	255.00	76.50	Legal - Case Administration
Maggie Chavez	Collecting and reviewing physical documents received.	3/16/2023	0.8	215.00	172.00	Legal - Case Administration
John Hall	Review and discuss outstanding tax needs with EC from BT.	3/17/2023	0.3	310.00	93.00	Financial - Tax Issues
John Hall	Review and analysis of draft petition from RLP and JPM at Buck Keenan. Discuss with GBW, notes and feedback re: same.	3/17/2023	1.8	310.00	558.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Review minute order, rescheduled hearing.	3/17/2023	0.1	340.00	34.00	Legal - Case Administration
John Hall	Review claims procedures motion, notice of claims bar date, and proof of claims form from KA for filing.	3/17/2023	0.8	310.00	248.00	Legal - Claims Administration and Objections
Geoff Winkler	Call with JPM re: employer tax statement.	3/20/2023	0.2	340.00	68.00	Financial - Tax Issues
Josh McGraw	Call with DETR re: outstanding tax statement.	3/20/2023	0.3	255.00	76.50	Financial - Tax Issues
Josh McGraw	Call with GBW re: employer tax statement.	3/20/2023	0.2	255.00	51.00	Financial - Tax Issues
Josh McGraw	Email to GBW re: DETR tax bill.	3/20/2023	0.1	255.00	25.50	Financial - Tax Issues
Anna Priebe	Discussion with JPM re: recovery and schedules for 3rd parties.	3/20/2023	0.2	215.00	43.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: third party recovery schedules.	3/20/2023	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call and messages with PCC re: third-party recovery schedules.	3/20/2023	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with GBW re: third party recovery schedules.	3/20/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Creating support for recovery schedules.	3/20/2023	2.4	255.00	612.00	Legal - Asset Analysis and Recovery
Josh McGraw	Discussion with AMP re: recovery and schedules for 3rd parties.	3/20/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Phil Chen	Call and messages with JPM re: third-party recovery schedules.	3/20/2023	0.5	215.00	107.50	Legal - Asset Analysis and Recovery
Phil Chen	Third-party recovery schedule and supporting documentation.	3/20/2023	1.0	215.00	215.00	Legal - Asset Analysis and Recovery
Amanda Deering	Email to KH and KA re: quarterly report litigation section summary.	3/20/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, JPM, PCC and GBW.	3/20/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Communication with JPM re: taxes.	3/20/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMD, JPM, PCC and GBW.	3/20/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMD, JPM, PCC and AMP.	3/20/2023	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Review email from investor, JPM re document request, review document.	3/20/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Review pleadings and prepare for upcoming hearing.	3/20/2023	0.5	340.00	170.00	Legal - Case Administration

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Geoff Winkler	Review tax statement, previous payroll reports, accounts payable, prepare payment for taxes.	3/20/2023	0.3	340.00	102.00	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	0.2	310.00	62.00	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	310.00	31.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: taxes.	3/20/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: domain name buyer inquiry.	3/20/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: investor question about accountant request.	3/20/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors re: timeline for claims process and distribution timeline.	3/20/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, AMD, PCC and GBW.	3/20/2023	0.1	255.00	25.50	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	215.00	21.50	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	255.00	25.50	Legal - Case Administration
Phil Chen	Meeting to discuss investor communication and confirmation of requested documents with MCC, JBH, MBB, AMP, AMD, JPM and GBW.	3/20/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Process five accounts payable.	3/21/2023	0.3	340.00	102.00	Financial - Accounting/Auditing
Josh McGraw	Reviewing documents in relativity for missing supporting documents.	3/21/2023	0.9	255.00	229.50	Financial - Data Analysis
John Hall	Review of schedules and compiled substantiating documentation.	3/21/2023	0.7	310.00	217.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with TW re: Searchlight property strategy.	3/21/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Creating a summary of third-party schedules, supporting documents, and emailing to KH and KA.	3/21/2023	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Josh McGraw	Creating support for recovery schedules.	3/21/2023	2.8	255.00	714.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to GBW and JBH re: third party schedules and summary of support.	3/21/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing support created by PCC and confirming schedules are completed.	3/21/2023	0.9	255.00	229.50	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support	3/21/2023	1.7	215.00	365.50	Legal - Asset Analysis and Recovery
Amanda Deering	Call with JPM re: lien reconveyance letters.	3/21/2023	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Communication with GBW and AMP re: website update.	3/21/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Messages with AMD re: updating investor website.	3/21/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Uploaded filings to investor website.	3/21/2023	0.3	215.00	64.50	Legal - Case Administration
Geoff Winkler	Communication with AMD re: website update.	3/21/2023	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Discuss claims procedure questions with counsel.	3/21/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Prepare for hearing, outline steps, progress, attend hearing to update court on recent activities.	3/21/2023	1.1	340.00	374.00	Legal - Case Administration
Geoff Winkler	Review third party recovery schedules, discuss with JPM.	3/21/2023	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Call with AMD re: lien reconveyance letters.	3/21/2023	0.2	255.00	51.00	Legal - Case Administration
John Hall	Review claims processing issues from KH and GBW.	3/21/2023	0.3	310.00	93.00	Legal - Claims Administration and Objections
Geoff Winkler	Review updated letter to third parties, discuss demand structure, finalize approach.	3/22/2023	0.3	340.00	102.00	Legal - Asset Analysis and Recovery
John Hall	Discussion with KH re: negotiation of repayment of ill-gotten gains and further discussion with GBW.	3/22/2023	0.4	310.00	124.00	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support	3/22/2023	1.5	215.00	322.50	Legal - Asset Analysis and Recovery
Amanda Deering	Operations meeting with AMP and JPM re: creating promoter schedules.	3/22/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Operations meeting with AMD and JPM re: creating promoter schedules.	3/22/2023	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Call with promoter/investor re case status, next steps.	3/22/2023	0.4	340.00	136.00	Legal - Case Administration
Josh McGraw	Operations meeting with AMP and AMD re: creating promoter schedules.	3/22/2023	0.1	255.00	25.50	Legal - Case Administration
John Hall	Review inquiries from JE on coordination of claims process, discuss with GBW.	3/22/2023	0.2	310.00	62.00	Legal - Claims Administration and Objections
Phil Chen	Third-party recovery schedule and supporting documentation.	3/23/2023	1.6	215.00	344.00	Legal - Asset Analysis and Recovery

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Geoff Winkler	Email from counsel re employee handbook, review records, notes, emails with counsel.	3/23/2023	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Final review of complaint, emails with counsel.	3/23/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Review lien documents, trustee, recommendations from counsel KH.	3/23/2023	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Communication with PCC re: third-party recovery schedules and supporting documents.	3/24/2023	0.6	255.00	153.00	Legal - Asset Analysis and Recovery
Josh McGraw	Creating schedules for third-party recovery.	3/24/2023	1.3	255.00	331.50	Legal - Asset Analysis and Recovery
Phil Chen	Communication with JPM re: third-party recovery schedules and supporting documents.	3/24/2023	0.6	215.00	129.00	Legal - Asset Analysis and Recovery
Phil Chen	Profit Connect third-party recovery: cross-reference bank statements and promotor schedules. Collect 20 supporting documents.	3/24/2023	3.0	215.00	645.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call from former employee.	3/24/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Call with investor.	3/24/2023	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Email to KB re: questions on personal property.	3/24/2023	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review email from JPM re investor payment, research, respond to JPM.	3/27/2023	0.3	340.00	102.00	Financial - Accounting/Auditing
Josh McGraw	Reviewing bank statements to determine if check copies were available.	3/27/2023	0.1	255.00	25.50	Financial - Accounting/Auditing
Josh McGraw	Reviewing documents in relativity to determine documentation for cash transactions.	3/27/2023	0.5	255.00	127.50	Financial - Data Analysis
Josh McGraw	Creating third-party recovery schedules and support.	3/27/2023	5.4	255.00	1,377.00	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and support.	3/27/2023	5.4	215.00	1,161.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting to discuss investor communication and confirmation of requested documents with MCC, MBB, AMP, JPM, PCC and GBW.	3/27/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Meeting to discuss investor communication and confirmation of requested documents with MCC, MBB, AMD, JPM, PCC and GBW.	3/27/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Updated website with new court filings.	3/27/2023	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss investor communication and confirmation of requested documents with MCC, MBB, AMD, JPM, PCC and AMP.	3/27/2023	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Conversation with AMP re: investor communication.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Conversation with MBB and PCC re: third-party recovery and claims process.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: deposit documentation.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Team meeting to discuss ongoing tasks and review updates with GBW, AMP, AMD, MBB, PCC, MCC.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Maggie Chavez	Team meeting to discuss ongoing tasks and review updates with GBW, AMP, AMD, JPM, PCC, MBB.	3/27/2023	0.1	215.00	21.50	Legal - Case Administration
Milana Barkhanoy	Conversation with JPM and PCC re: third-party recovery and claims process.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss ongoing tasks and review updates with GBW, AMP, AMD, JPM, PCC, MCC.	3/27/2023	0.1	255.00	25.50	Legal - Case Administration
Phil Chen	Conversation with MBB and JPM re: third-party recovery and claims process.	3/27/2023	0.1	215.00	21.50	Legal - Case Administration
Phil Chen	Team meeting to discuss ongoing tasks and review updates with GBW, AMP, AMD, MBB, JPM, MCC.	3/27/2023	0.1	215.00	21.50	Legal - Case Administration
Josh McGraw	Reviewing PayPal account to determine claimant deposits.	3/28/2023	0.6	255.00	153.00	Financial - Accounting/Auditing
Josh McGraw	Communication with AMD re: outstanding searchlight properties.	3/28/2023	0.2	255.00	51.00	Financial - Status Reports
John Hall	Review draft schedules from JPM and discuss with GBW.	3/28/2023	1.0	310.00	310.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with PCC regarding third-party recovery schedule and support.	3/28/2023	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
Josh McGraw	Creating third-party recovery schedules and support.	3/28/2023	1.8	255.00	459.00	Legal - Asset Analysis and Recovery
Phil Chen	Call with JPM regarding PC third-party recovery schedule and support.	3/28/2023	0.4	215.00	86.00	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and support	3/28/2023	1.4	215.00	301.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication with JPM re: lien reconveyance letters.	3/28/2023	0.2	225.00	45.00	Legal - Case Administration
Amanda Deering	Communication with JPM re: status report update.	3/28/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Email to JPM re: lien release.	3/28/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Preparing letters for lien releases.	3/28/2023	1.2	225.00	270.00	Legal - Case Administration

SEC v. Profit Connect Wealth Services, Inc. et al.  
 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	Preparing status report.	3/28/2023	1.2	225.00	270.00	Legal - Case Administration
Josh McGraw	Call with AMD re: lien reconveyance letters.	3/28/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to AMD re: lien reconveyance letter draft.	3/28/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails with investors re: lien reconveyances and distribution timeline.	3/28/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewing documentation provided by AR to confirm their claim amount.	3/28/2023	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Reviewing lien reconveyance letter from AMD.	3/28/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Email from JPM on claim form details.	3/28/2023	0.1	225.00	22.50	Legal - Claims Administration and Objections
Josh McGraw	Email to JE re: outstanding items for claims process.	3/28/2023	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Creating velocity of funds analysis of bank accounts.	3/29/2023	0.5	255.00	127.50	Financial - Accounting/Auditing
Josh McGraw	Call with TW re: pricing for Searchlight properties.	3/29/2023	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Creating third-party recovery schedules and support.	3/29/2023	0.7	255.00	178.50	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing documentation production provided by KA.	3/29/2023	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support.	3/29/2023	2.4	215.00	516.00	Legal - Asset Analysis and Recovery
Amanda Deering	Discussing sending release of lien letters with JPM.	3/29/2023	0.1	225.00	22.50	Legal - Case Administration
Amanda Deering	Operations meeting with AMP and JPM re: claims process.	3/29/2023	0.1	225.00	22.50	Legal - Case Administration
Anna Priebe	Operations meeting with AMD and JPM re: claims process.	3/29/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Preparing received documents for team review.	3/29/2023	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Reviewing bank documents with JPM.	3/29/2023	0.3	215.00	64.50	Legal - Case Administration
Geoff Winkler	Meeting with KA, KH, JM, RP, and JPM re: claims process and third-party recovery.	3/29/2023	0.4	340.00	136.00	Legal - Case Administration
Josh McGraw	Communication with AMD re: lien reconveyance letters.	3/29/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KA re: subpoena response.	3/29/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KH re: draft lien reconveyance letters.	3/29/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to claimants re: claims process updates and distribution timelines.	3/29/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with KA, KH, JM, RP, and GBW re: claims process and third-party recovery.	3/29/2023	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Modifying lien reconveyance letters with correct contact information.	3/29/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Operations meeting with AMD and AMP re: claims process.	3/29/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing additional lien reconveyance letters from AMD and verify correct title information from title documents.	3/29/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewing bank documents with AMP.	3/29/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewing relativity to confirm timeline for EK.	3/29/2023	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Updating counsel call agenda with updates on outstanding case items.	3/29/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Call with JPM re: KCC claims process.	3/29/2023	0.2	225.00	45.00	Legal - Claims Administration and Objections
Josh McGraw	Call with AMD re: KCC claims process.	3/29/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Amanda Deering	Communication with JPM re: EK bank documents and options for further investigation.	3/30/2023	0.2	225.00	45.00	Financial - Data Analysis
John Hall	Velocity of funds analysis among all BOA accounts.	3/30/2023	2.2	310.00	682.00	Financial - Data Analysis
Josh McGraw	Communication with AMD re: EK bank documents and options for further investigation.	3/30/2023	0.2	255.00	51.00	Financial - Data Analysis
Josh McGraw	Grabbing documentation from relativity related to EK.	3/30/2023	0.2	255.00	51.00	Financial - Data Analysis
Josh McGraw	Reviewing documents in relativity to confirm entities related to individuals.	3/30/2023	0.6	255.00	153.00	Financial - Data Analysis
Amanda Deering	Meeting with JPM re: discussion of third-party recovery letters.	3/30/2023	0.3	225.00	67.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: third party recovery process.	3/30/2023	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
John Hall	Review summaries and draft recovery letters, edits, and communicate issues with GBW.	3/30/2023	0.7	310.00	217.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with GBW re: third party recovery process.	3/30/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Communication to PCC re: schedules completed and ready for supporting documentation to be prepared.	3/30/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Creating third-party recovery schedules and support.	3/30/2023	2.6	255.00	663.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to KA and KH re: third party recovery letters and confirmation of next steps.	3/30/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery

**SEC v. Profit Connect Wealth Services, Inc. et al.**  
**Summary of Fees of Receiver and Retained Personnel**  
**January 1, 2023 - March 31, 2023**  
**(Sorted in Chronological Order by Activity Category)**

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Josh McGraw	Meeting with AMD re: discussion of third-party recovery letters.	3/30/2023	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing KA changes on third party recovery letter and creating a clean version.	3/30/2023	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
	Communication to JPM re: schedules completed and ready for supporting documentation to be prepared.	3/30/2023	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support	3/30/2023	1.3	215.00	279.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Review EE recovery letter, discuss changes with JPM.	3/30/2023	0.2	340.00	68.00	Legal - Case Administration
	Review updated third party recovery letters, discuss with JPM re need to court approval, response from counsel.	3/30/2023	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler		3/30/2023	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Emails to investors re: updates on the receivership and claims process.	3/30/2023	0.2	255.00	51.00	Legal - Case Administration
Amanda Deering	Meeting with JPM re: claims process and discussion with KCC.	3/30/2023	0.4	225.00	90.00	Legal - Claims Administration and Objections
John Hall	Review KCC claims issues from JA.	3/30/2023	0.1	310.00	31.00	Legal - Claims Administration and Objections
Josh McGraw	Call with JA re: paper claims form process and determine any outstanding issues.	3/30/2023	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Email communication with JA re: claims process.	3/30/2023	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Meeting with AMD re: claims process and discussion with KCC.	3/30/2023	0.4	255.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Summarizing paper claims form process and email to KA, KH, JBH and GBW.	3/30/2023	0.3	255.00	76.50	Legal - Claims Administration and Objections
John Hall	Velocity of funds analysis on BOA accounts for counsel and team review, memo re: same.	3/31/2023	4.5	310.00	1,395.00	Financial - Forensic Accounting
Josh McGraw	Communication with PCC re: status of third-party recovery schedules.	3/31/2023	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Creating third-party recovery schedules and support.	3/31/2023	0.7	255.00	178.50	Legal - Asset Analysis and Recovery
Phil Chen	Communication with JPM re: status of third-party recovery schedules.	3/31/2023	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
Phil Chen	Creating third-party recovery schedules and collecting support.	3/31/2023	1.6	215.00	344.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting with JPM to discuss claims form details.	3/31/2023	0.3	225.00	67.50	Legal - Case Administration
Geoff Winkler	Review paper claim form costs and timing to deploy.	3/31/2023	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Call with investor re: questions on distribution timeline and claims process.	3/31/2023	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to investor re: claims process timeline.	3/31/2023	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMD to discuss claims form details.	3/31/2023	0.3	255.00	76.50	Legal - Case Administration
John Hall	Review claims issues with JPM and KA.	3/31/2023	0.5	310.00	155.00	Legal - Claims Administration and Objections
	<b>Totals</b>		<b>225.0</b>		<b>59,723.50</b>	



SEC v. Profit Connect Wealth Services, Inc. et al.  
 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
<b>Summary by Activity Category and Personnel</b>						
<b>Financial - Accounting/Auditing</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Accounting/Auditing	Geoff Winkler	AFS	2.5	340.00	\$ 850.00	
Financial - Accounting/Auditing	John Hall	AFS	2.3	310.00	\$ 713.00	
Financial - Accounting/Auditing	Josh McGraw	AFS	2.4	255.00	\$ 612.00	
			<u>7.2</u>		<u>\$ 2,175.00</u>	
<b>Financial - Data Analysis</b>	<b>Personnel</b>					
Financial - Data Analysis	John Hall	AFS	2.2	310.00	\$ 682.00	
Financial - Data Analysis	Josh McGraw	AFS	5.0	255.00	\$ 1,275.00	
Financial - Data Analysis	Amanda Deering	AFS	0.2	225.00	\$ 45.00	
			<u>7.4</u>		<u>\$ 2,002.00</u>	
<b>Financial - Forensic Accounting</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Forensic Accounting	John Hall	AFS	4.5	310.00	\$ 1,395.00	
			<u>4.5</u>		<u>\$ 1,395.00</u>	
<b>Financial - Status Reports</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Status Reports	Geoff Winkler	AFS	0.3	340.00	\$ 102.00	
Financial - Status Reports	John Hall	AFS	4.5	310.00	\$ 1,395.00	
Financial - Status Reports	Josh McGraw	AFS	2.6	255.00	\$ 663.00	
Financial - Status Reports	Amanda Deering	AFS	1.0	225.00	\$ 225.00	
			<u>8.4</u>		<u>\$ 2,385.00</u>	
<b>Financial - Tax Issues</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Financial - Tax Issues	Geoff Winkler	AFS	0.2	340.00	\$ 68.00	
Financial - Tax Issues	John Hall	AFS	0.6	310.00	\$ 186.00	
Financial - Tax Issues	Josh McGraw	AFS	0.6	255.00	\$ 153.00	
			<u>1.4</u>		<u>\$ 407.00</u>	
<b>Legal - Asset Analysis and Recovery</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Legal - Asset Analysis and Recovery	Geoff Winkler	AFS	1.7	340.00	\$ 578.00	
Legal - Asset Analysis and Recovery	John Hall	AFS	16.3	310.00	\$ 5,053.00	
Legal - Asset Analysis and Recovery	Milana Barkhanoy	AFS	0.3	255.00	\$ 76.50	
Legal - Asset Analysis and Recovery	Josh McGraw	AFS	37.2	255.00	\$ 9,486.00	
Legal - Asset Analysis and Recovery	Amanda Deering	AFS	0.5	225.00	\$ 112.50	
Legal - Asset Analysis and Recovery	Anna Priebe	AFS	0.2	215.00	\$ 43.00	
Legal - Asset Analysis and Recovery	Phil Chen	AFS	32.6	215.00	\$ 7,009.00	
			<u>88.8</u>		<u>\$ 22,358.00</u>	
<b>Legal - Case Administration</b>	<b>Personnel</b>	<b>Firm</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>	
Legal - Case Administration	Geoff Winkler	AFS	18.1	340.00	\$ 6,154.00	
Legal - Case Administration	John Hall	AFS	7.7	310.00	\$ 2,387.00	
Legal - Case Administration	Milana Barkhanoy	AFS	1.2	255.00	\$ 306.00	
Legal - Case Administration	Josh McGraw	AFS	21.0	255.00	\$ 5,355.00	
Legal - Case Administration	Amanda Deering	AFS	12.8	225.00	\$ 2,880.00	
Legal - Case Administration	Maggie Chavez	AFS	2.7	215.00	\$ 580.50	
Legal - Case Administration	Anna Priebe	AFS	5.8	215.00	\$ 1,247.00	
Legal - Case Administration	Phil Chen	AFS	0.3	215.00	\$ 64.50	

SEC v. Profit Connect Wealth Services, Inc. et al.  
 Summary of Fees of Receiver and Retained Personnel  
 January 1, 2023 - March 31, 2023  
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
			69.6		\$ 18,974.00	

Legal - Claims Administration and Objections	Personnel	Firm	Hours	Rate	Amount
Legal - Claims Administration and Objections	Geoff Winkler	AFS	0.7	340.00	\$ 238.00
Legal - Claims Administration and Objections	John Hall	AFS	11.1	310.00	\$ 3,441.00
Legal - Claims Administration and Objections	Josh McGraw	AFS	18.4	255.00	\$ 4,692.00
Legal - Claims Administration and Objections	Amanda Deering	AFS	4.4	225.00	\$ 990.00
Legal - Claims Administration and Objections	Anna Priebe	AFS	3.1	215.00	\$ 666.50
			<u>37.7</u>		<u>\$ 10,027.50</u>

Overall Summary					
Totals	Personnel	Firm	Hours	Rate	Amount
	Geoff Winkler	AFS	23.5	340.00	\$ 7,990.00
	John Hall	AFS	49.2	310.00	\$ 15,252.00
	Milana Barkhanoy	AFS	1.5	255.00	\$ 382.50
	Josh McGraw	AFS	87.2	255.00	\$ 22,236.00
	Amanda Deering	AFS	18.9	225.00	\$ 4,252.50
	Maggie Chavez	AFS	2.7	215.00	\$ 580.50
	Anna Priebe	AFS	9.1	215.00	\$ 1,956.50
	Phil Chen	AFS	32.9	215.00	\$ 7,073.50
			<u>225.0</u>		<u>\$ 59,723.50</u>
	<b>TOTAL FEES</b>		<b>225.0</b>		<b>\$ 59,723.50</b>

SEC v. Profit Connect Wealth Services, Inc. et al.  
 Summary of Expenses of Receiver and Retained Personnel  
 January 1, 2023 - March 31, 2023

Attachment 2

Incurring By	Payee	Item / Description	Date Incurred	Amount	Category
John Hall	Extra Space	Storage	01/02/23	213.08	Document and Asset Storage
Geoff Winkler	GoDaddy	Domain renewal	01/04/23	20.17	Internet/Online Fees
Geoff Winkler	Alaska Airlines	Airfare	02/01/23	609.43	Airfare
John Hall	Extra Space	Storage	02/01/23	213.08	Document and Asset Storage
John Hall	UPS	UPS - Delivery services * Internet/Online Fees	02/15/23	25.49	Courier/Shipping/Freight
John Hall	Transunion	TLO online search.	03/01/23	19.46	Internet/Online Fees
John Hall	Extra Space	Storage	03/01/23	213.08	Document and Asset Storage
Geoff Winkler	Marriott	Marriott Hotel (1 night)	03/03/23	347.10	Hotel
<b>Total</b>				<u>1,660.89</u>	

	Geoff Winkler	John Hall			Total
<b>Airfare</b>	609.43	-	-	-	609.43
<b>Car Rental</b>	-	-	-	-	-
<b>Courier/Shipping/Freight</b>	-	25.49	-	-	25.49
<b>Document and Asset Storage</b>	-	639.24	-	-	639.24
<b>Fuel</b>	-	-	-	-	-
<b>Hotel</b>	347.10	-	-	-	347.10
<b>Individual Meals</b>	-	-	-	-	-
<b>Internet/Online Fees</b>	20.17	19.46	-	-	39.63
<b>Miscellaneous</b>	-	-	-	-	-
<b>Office Supplies</b>	-	-	-	-	-
<b>Parking</b>	-	-	-	-	-
<b>Personal Car Mileage</b>	-	-	-	-	-
<b>Printing/Photocopying/Stationery</b>	-	-	-	-	-
<b>Taxi</b>	-	-	-	-	-
<b>Total</b>	<b>976.70</b>	<b>684.19</b>	-	-	<b>1,660.89</b>

**SEC v. Profit Connect Wealth Services, Inc. et al.**  
**Receivership Estate Balance Sheet**  
**January 1, 2023 - March 31, 2023**

**Attachment 3**

**Assets:**

Cash	\$	9,007,926
Loan Receivable	\$	-
Marketable Securities	\$	-
Real Property <sup>1</sup>	\$	816,000
Personal Property <sup>1</sup>	\$	-
Private Equity Investments <sup>1</sup>	\$	-
Existing Litigation <sup>2,3</sup>	\$	-
Third Party Litigation <sup>2,3</sup>	\$	2,820,000
Professional Liability Litigation <sup>2,3</sup>	\$	5,000,000

**Total Assets**

**\$ 17,643,926**

**Liabilities:**

State/Federal Taxes <sup>4</sup>	\$	-
Property Taxes <sup>4</sup>	\$	-
Admin Holdback <sup>1</sup>	\$	337,226
<b>Total Liabilities</b>	<b>\$</b>	<b>337,226</b>

**Claims:<sup>1</sup>**

Investors <sup>5</sup>	\$	-
Creditors <sup>5</sup>	\$	-
<b>Total Claims</b>	<b>\$</b>	<b>-</b>

**Total Liabilities plus Claims**

**\$ 337,226**

- 
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. Profit Connect Wealth Services, Inc. et al.  
Receiver's Cash Receipts and Disbursements  
January 1, 2023 - March 31, 2023**

**Attachment 4**

<b>Beginning Balance of Cash in Receivership Estate on January 1, 2023</b>	<b>\$ 9,100,833.60</b>
<b>Deposits:</b>	<b>\$ 7,500.00</b>
<b>Payments:</b>	<b>\$ (100,407.71)</b>
<b>Ending Balance of Cash in Receivership Estate on March 31, 2023</b>	<b><u>\$ 9,007,925.89</u></b>

# EXHIBIT "2"

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11 Costa Mesa, California 92626  
Telephone: (714) 445-1000  
12 Facsimile: (714) 445-1002  
13 Email: kandrassy@swelawfirm.com

14 *Attorneys for Receiver,*  
15 *Geoff Winkler of American Fiduciary Services*

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE  
COMMISSION,  
19  
20 Plaintiff,  
21 v.  
22 PROFIT CONNECT WEALTH SERVICES,  
INC., JOY I. KOVAR, and BRENT CARSON  
23 KOVAR,  
24 Defendants

CASE NO. 2:21-cv-01298-JAD-BNW

**DECLARATION OF KARA B.  
HENDRICKS IN SUPPORT OF  
APPLICATION FOR ALLOWANCE  
AND PAYMENT OF FEES AND  
COSTS OF THE RECEIVER AND HIS  
PROFESSIONALS FOR THE PERIOD  
FROM JANUARY 1, 2023, THROUGH  
MARCH 31, 2023**

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28 ///

1 I, KARA B. HENDRICKS, hereby declare as follows:

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

5 2. I make this declaration in support of the Receiver’s application for approval of his  
6 fees and costs and those of his professionals in connection with Profit Connect Wealth Services,  
7 Inc. This declaration is based on my personal knowledge, except where made on information and  
8 belief, and as to those matters, I believe them to be true.

9 3. GT was retained by the Receiver in June 2022. The Receiver selected Greenberg  
10 Traurig as one of two firms serving as general receivership counsel due to the firm's litigation  
11 experience, receivership experience, and strong Nevada base.

12 4. Attached to this declaration is a true and correct copy of the invoices for the  
13 services of my firm for the period from January 1, 2023, through March 31, 2023 (the  
14 “Application Period”).

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

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

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

24 8. The firm’s computer billing system keeps a record of all time spent on a  
25 client/matter, the professional providing the services, and a description of the services rendered.  
26 The firm’s computer billing system automatically multiplies the time expended by each  
27 professional by the respective professional's billing rate to calculate the amount of the fee. The  
28 firm conducts its business in reliance on the accuracy of such business records



1           9.       As reflected in the attached invoice, and pursuant to the Receivership Order (ECF  
2 No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46), professionals at  
3 Greenberg Traurig assisted the Receiver as follows during the Application Period: (1) tracking  
4 subpoenaed documents; (2) monitoring matters involving Roshak settlement compliance;  
5 (3) analyzing issues relating to third party claims and ancillary proceedings; (4) commencing  
6 efforts to have liens released; and (5) assisting the Receiver’s teams with reporting obligations.  
7 Greenberg Traurig and Smiley Wang-Ekval have coordinated their efforts to avoid any  
8 duplication of services.

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

12           11.       I hereby certify that I have read the Application of Receiver and Receiver’s  
13 Professionals for Allowance and Payment of Fees and Costs for the Period from January 1, 2023  
14 through March 31, 2023 to which this declaration will be attached.

15           12.       To the best of my knowledge, information and belief formed after reasonable  
16 inquiry, the Application and all fees and expenses therein are true and accurate and comply with  
17 the Billing Instructions for Receivers in Civil Actions commenced by the U.S. Securities and  
18 Exchange Commission.

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

26       ///

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28       ///

GREENBERG TRAURIG, LLP  
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135  
Telephone: (702) 792-3773 Facsimile: (702) 792-9002

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

3 Executed on June 9, 2023.

4 */s/ Kara B. Hendricks*

KARA B. HENDRICKS

Declarant

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GREENBERG TRAURIG, LLP  
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135  
Telephone: (702) 792-3773 Facsimile: (702) 792-9002

**ATTACHMENT**



Invoice No. : 1000298376  
File No. : 209375.010200

**REMITTANCE ADVICE**

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

**CLIENT NAME:** WINKLER, GEOFF  
**FILE NUMBER:** 209375.010200  
**INVOICE NUMBER:** 1000298376\*  
**BILLING PROFESSIONAL:** Kara B. Hendricks

Current Invoice:	\$	4,223.00
Previous Balance:	\$	5,530.70
Total Amount Due:	\$	9,753.70

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: 209375.010200  
INVOICE NUMBER: 1000298376\*  
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. : 1000298376  
 File No. : 209375.010200

### Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
08/16/22	1000055915	1,830.36	0.00	0.00	1,830.36
09/13/22	1000071911	750.00	0.00	0.00	750.00
10/10/22	1000106259	653.47	0.00	0.00	653.47
11/09/22	1000142692	649.94	0.00	0.00	649.94
12/09/22	1000166296	827.05	0.00	0.00	827.05
01/09/23	1000193059	410.90	0.00	0.00	410.90
03/08/23	1000246231	408.98	0.00	0.00	408.98
	Totals:	\$ 5,530.70	\$ 0.00	\$ 0.00	\$ 5,530.70

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	Meet with J. Rohrback and D. Edington regarding lien release issues;	0.30	144.08
01/06/23	Kara B. Hendricks	Attention to issues relating to lien on NJ property and correspond with J. Rohrback and J. McGraw regarding next steps;	0.20	96.05
01/17/23	Kara B. Hendricks	Discuss New Jersey lien issue with J. McGraw and review related email;	0.10	48.03
01/23/23	Kara B. Hendricks	Review TX petition and provide comments to counsel regarding same;	0.60	288.15
01/23/23	Kara B. Hendricks	Follow-up with J. Rohrback regarding lien releases;	0.10	48.03
01/27/23	Kara B. Hendricks	Review and revise status report and correspond with J. McGraw regarding same;	0.40	192.10
01/30/23	Kara B. Hendricks	Review and revise status report and follow-up with J. Hall regarding exhibits for filing;	0.50	240.13
01/30/23	Kara B. Hendricks	Correspond with J. McGraw regarding claims motion and signature requirements;	0.10	48.03
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
01/31/23	Kara B. Hendricks	Attention to emails regarding status report and update and finalize same;	0.50	240.13
01/31/23	Kara B. Hendricks	Revise correspondence to Camerons regarding NJ lien findings;	0.30	144.08
01/31/23	Kara B. Hendricks	Attention to minute order and notice requirements and review local rule relating to service send G. Winkler proposed service plan relating to notice of upcoming hearing;	0.50	240.13
01/31/23	Kara B. Hendricks	Review and revise status report and correspond with J. McGraw to finalize same (.6) Work with E. Escobar-Gaddi to finalize exhibits for filing (.3);	0.90	432.23
Total Hours:			4.70	
Total Amount:				\$ 2,229.17

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	4.50	565.00	2,542.50
Kyle Ewing	0.20	400.00	80.00
Totals:	4.70		\$ 2,622.50

**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	4.50	480.26	2,161.17
Kyle Ewing	0.20	340.00	68.00
Totals:	4.70		\$ 2,229.17

TASK CODE: GW002 ASSET DISPOSITION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	David Edington	Attention to lien releases and conference regarding same.	0.40	207.40
			<b>Total Hours:</b>	<b>0.40</b>
			<b>Total Amount:</b>	<b>\$ 207.40</b>

TIMEKEEPER SUMMARY FOR TASK CODE GW002,

ASSET DISPOSITION

**Summary of Fees (Base Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
David Edington	0.40	610.00	244.00
Totals:	0.40		\$ 244.00

**Summary of Fees (Discounted Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
David Edington	0.40	518.50	207.40
Totals:	0.40		\$ 207.40



TASK CODE: GW003 BUSINESS OPERATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/23	Jennifer Rohrbach	Research regarding lien release forms. Telephone conference with First American Title Insurance Company regarding requirements and fees.	0.70	122.50
01/04/23	Jennifer Rohrbach	Correspondence with First American Title Insurance Company regarding lien release requirements and fees.	0.40	70.00
01/05/23	Jennifer Rohrbach	Telephone conference with Daniela Krinshpun and review of New Jersey lien release requirements.	0.30	52.50
01/30/23	Jennifer Rohrbach	Prepare draft letter regarding deed status for the property located at 10 Devon Place, Forked River, NJ 08731. Corresponded with First American Title regarding preparation and recording of lien release.	1.30	227.50
01/31/23	Jennifer Rohrbach	Correspondence with First American Title regarding lien release documents.	0.40	70.00
Total Hours:			3.10	
Total Amount:				\$ 542.50

TIMEKEEPER SUMMARY FOR TASK CODE GW003,

BUSINESS OPERATIONS

**Summary of Fees (Base Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	3.10	285.00	883.50
Totals:	3.10		\$ 883.50

**Summary of Fees (Discounted Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	3.10	175.00	542.50
Totals:	3.10		\$ 542.50

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 for status report and correspond with A. Deering and K. Andrassy regarding same;	0.50	240.13
01/04/23	Kara B. Hendricks	Review email from R. Robert regarding PERS meeting; Respond to email from J. McGraw regarding meeting and provide update;	0.10	48.03
01/05/23	Daniela Krinshpun	Review of NJ law question regarding release of Deed of Trust.	0.60	331.50
01/25/23	Kara B. Hendricks	Respond to A. Deering inquiries regarding finalizing status report;	0.10	48.03
01/27/23	Kara B. Hendricks	Follow-up regarding status of PERS hearing;	0.10	48.03
Total Hours:			1.40	
Total Amount:				\$ 715.72

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	0.80	565.00	452.00
Daniela Krinshpun	0.60	650.00	390.00
Totals:	1.40		\$ 842.00

**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	0.80	480.28	384.22
Daniela Krinshpun	0.60	552.50	331.50
Totals:	1.40		\$ 715.72

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/18/23	Kara B. Hendricks	Participate in meeting with J. McCraw, K. Andrassy, R. Paddock and JP Manning to discuss case status, potential new recover efforts, and additional resources needed;	0.80	384.13
01/27/23	Kara B. Hendricks	Review and revise draft claim form and follow-up with J. McGraw and K. Andrassy regarding same;	0.30	144.08
Total Hours:			1.10	
Total Amount:				\$ 528.21

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	1.10	565.00	621.50
Totals:	1.10		\$ 621.50

**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	1.10	480.19	528.21
Totals:	1.10		\$ 528.21

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.40	610.00	244.00
Kara B. Hendricks	6.40	565.00	3,616.00
Kyle Ewing	0.20	400.00	80.00
Daniela Krinshpun	0.60	650.00	390.00
Jennifer Rohrbach	3.10	285.00	883.50
	<hr/>	<hr/>	<hr/>
Totals:	10.70		\$ 5,213.50

**Summary of Fees (Discounted Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	0.40	518.50	207.40
Kara B. Hendricks	6.40	480.25	3,073.60
Kyle Ewing	0.20	340.00	68.00
Daniela Krinshpun	0.60	552.50	331.50
Jennifer Rohrbach	3.10	175.00	542.50
	<hr/>	<hr/>	<hr/>
Totals:	10.70		\$ 4,223.00

Invoice No.: 1000298376  
Re: Profit Connect Receivership  
Matter No.: 209375.010200

Page 9

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. : 1000246231  
 File No. : 209375.010200  
 Bill Dat : March 8, 202

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

## INVOIC

Re: Profit Connect Receivership

Legal Services through February 28, 2023:

	Total Fees	\$	2,044.88
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Expenses:

Local Travel			12.97
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	Total Expenses:	\$	12.97
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	<b>Current Invoice:</b>	<b>\$</b>	<b>2,057.85</b>
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Previous Balance (see attached statement):		\$	19,813.49
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	<b>Total Amount Due:</b>	<b>\$</b>	<b>21,871.34</b>
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KBH:LC  
 Tax ID: 13-3613083



Invoice No.: 1000246231  
File No.: 209375.010200

**REMITTANCE ADVICE**

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

**CLIENT NAME:** WINKLER, GEOFF  
**FILE NUMBER:** 209375.010200  
**INVOICE NUMBER:** 1000246231\*  
**BILLING PROFESSIONAL:** Kara B. Hendricks

Current Invoice:	\$	2,057.85
Previous Balance:	\$	19,813.49
Total Amount Due:	\$	21,871.34

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:** 209375.010200  
**INVOICE NUMBER:** 1000246231\*  
**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. : 1000246231  
 File No. : 209375.010200

### Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
08/16/22	1000055915	1,830.36	0.00	0.00	1,830.36
09/13/22	1000071911	750.00	0.00	0.00	750.00
10/10/22	1000106259	653.47	0.00	0.00	653.47
11/09/22	1000142692	3,249.70	0.00	0.00	3,249.70
12/09/22	1000166296	4,135.25	0.00	0.00	4,135.25
01/09/23	1000193059	2,054.50	0.00	0.00	2,054.50
02/10/23	1000219937	7,140.21	0.00	0.00	7,140.21
	Totals:	\$ 19,813.49	\$ 0.00	\$ 0.00	\$ 19,813.49

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	Attention to email from R. Paddock and draft petition and follow-up with K. Andrassy and G. Winkler regarding same;	0.20	96.05
02/07/23	Kara B. Hendricks	Respond to email from J. Rohrback regarding lien issue;	0.10	48.03
02/09/23	Kara B. Hendricks	Correspond with J. Rohrback regarding lien release issues;	0.10	47.99
02/13/23	Kara B. Hendricks	Telephone call with R. Ryan regarding PERS hearing and email G. Winkler regarding continuance requested;	0.40	192.10
02/13/23	Kara B. Hendricks	Follow-up with J. Rohbach regarding lien release documents and review drafts;	0.30	144.08
02/14/23	Kara B. Hendricks	Update J. McGraw regarding same; Telephone call with R. Ryan regarding PERS hearing and lien on house and update G. Winkler regarding same;	0.30	144.08
02/14/23	Kara B. Hendricks	Review lien release forms and follow-up regarding notary assistance to finalize same;	0.10	48.03
02/14/23	Kara B. Hendricks	Follow-up with H. Agree regarding assistance with documents to line Roshak real property and review emails from G. Winkler relating to same;	0.20	96.05
02/14/23	Kara B. Hendricks	Attention to email and documents from I. Carr including presentation materials for upcoming PERS board meeting and draft response to same;	0.50	240.13
02/16/23	Kara B. Hendricks	Review emails regarding lien documents and follow-up regarding execution and notarization issues;	0.20	96.05
02/23/23	Kara B. Hendricks	Discuss letter to defendants regarding turnover of receivership property with C. Ney;	0.30	144.08
02/27/23	Kara B. Hendricks	Discuss recorded lien release documents with E. Escobar-Gaddi and follow-up with J. McGraw regarding same;	0.20	96.05
			<hr/>	
			Total Hours:	2.90
			Total Amount:	\$ 1,392.72

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	2.90	565.00	1,638.50
Totals:	2.90		\$ 1,638.50

**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	2.90	480.25	1,392.72
Totals:	2.90		\$ 1,392.72

TASK CODE: GW003 BUSINESS OPERATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/08/23	Jennifer Rohrbach	Review and revision of lien release forms (0.2). Correspondence with First American Title regarding lien release forms (0.2).	0.40	70.00
02/09/23	Jennifer Rohrbach	Review and revision of lien release forms (0.4). Correspondence with First American Title regarding lien release forms (0.3).	0.70	122.50
02/13/23	Jennifer Rohrbach	Review and revision of lien release forms (notary blocks) (0.2). Correspondence with First American Title regarding lien release forms (0.1).	0.30	52.50
02/16/23	Kathi Neilson	Travel to AFC's Las Vegas office and perform notarization for receivership documents.	1.40	119.00
			Total Hours:	2.80
			Total Amount:	\$ 364.00

TIMEKEEPER SUMMARY FOR TASK CODE GW003.

## BUSINESS OPERATIONS

**Summary of Fees (Base Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	1.40	285.00	399.00
Kathi Neilson	1.40	100.00	140.00
Totals:	2.80		\$ 539.00

**Summary of Fees (Discounted Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Jennifer Rohrbach	1.40	175.00	245.00
Kathi Neilson	1.40	85.00	119.00
Totals:	2.80		\$ 364.00

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/03/23	Kara B. Hendricks	Review correspondence from R. Robert regarding PERS hearing and check website for agenda;	0.10	48.03
02/08/23	Kara B. Hendricks	Provide J. Rohrbach appointment documents to provide to title company to facilitate lien release;	0.20	96.05
02/14/23	Kara B. Hendricks	Confer with H. Agee regarding mechanism to secure receivership interest in Roshak house and review of background and key documents;	0.30	144.08
Total Hours:			0.60	
Total Amount:				\$ 288.16

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	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	480.27	288.16
Totals:	0.60		\$ 288.16

**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	3.50	565.00	1,977.50
Jennifer Rohrbach	1.40	285.00	399.00
Kathi Neilson	1.40	100.00	140.00
Totals:	6.30		\$ 2,516.50

**Summary of Fees (Discounted Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kara B. Hendricks	3.50	480.25	1,680.88
Jennifer Rohrbach	1.40	175.00	245.00
Kathi Neilson	1.40	85.00	119.00
Totals:	6.30		\$ 2,044.88

Invoice No.: 1000246231  
Re: Profit Connect Receivership  
Matter No.: 209375.010200

Page 7

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
02/16/23	VENDOR: Neilson, Kathi INVOICE#: 5723920902211544 DATE: 2/21/2023 Mileage; 02/16/23 - Travel to client to perform notarization for receiver docuents	\$ 12.97
	Total Expenses:	\$ 12.97



Invoice No. : 1000298043  
File No. : 209375.010200  
Bill Date : May 3, 2023

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

**INVOICE**

Re: Profit Connect Receivership

THIS INVOICE REPLACES INVOICE 1000271949

Total Fees: \$ 5,770.65

Expenses:

Professional & Legal 1,266.75

Total Expenses: \$ 1,266.75

**Current Invoice: \$ 7,037.40**

Previous Balance (see attached statement): \$ 6,936.22

**Total Amount Due: \$ 13,973.62**

KBH:LC  
Tax ID: 13-3613083



Invoice No.: 1000298043  
File No.: 209375.010200

**REMITTANCE ADVICE**

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

**CLIENT NAME:** WINKLER, GEOFF  
**FILE NUMBER:** 209375.010200  
**INVOICE NUMBER:** 1000298043\*  
**BILLING PROFESSIONAL:** Kara B. Hendricks

Current Invoice:	\$	7,037.40
Previous Balance:	\$	6,936.22
Total Amount Due:	\$	13,973.62

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:** 209375.010200  
**INVOICE NUMBER:** 1000298043\*  
**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. : 1000298043  
 File No. : 209375.010200

### Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
08/16/22	1000055915	1,830.36	0.00	0.00	1,830.36
09/13/22	1000071911	750.00	0.00	0.00	750.00
10/10/22	1000106259	653.47	0.00	0.00	653.47
11/09/22	1000142692	649.94	0.00	0.00	649.94
12/09/22	1000166296	827.05	0.00	0.00	827.05
01/09/23	1000193059	410.90	0.00	0.00	410.90
02/10/23	1000219937	1,405.52	0.00	0.00	1,405.52
03/08/23	1000246231	408.98	0.00	0.00	408.98
	Totals:	\$ 6,936.22	\$ 0.00	\$ 0.00	\$ 6,936.22

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>
03/01/23	Kara B. Hendricks	Call with K. Wanner, G. Winkler and K. Andrassy to discuss case status and next steps (.2); Debrief with receivership team regarding same (.1);	0.30	144.07
03/03/23	Kara B. Hendricks	Review correspondence from G. Winkler regarding vendor concerns regarding fees;	0.10	48.02
03/07/23	Kara B. Hendricks	Follow-up with H. Agee regarding property lien and provide copy of underlying settlement and house information;	0.10	48.02
03/15/23	Kara B. Hendricks	Work with K. Ewing on procedural aspects of motion regarding distributions and selling interest in certain properties;	0.40	192.10
03/15/23	Kara B. Hendricks	Participate in call with G. Winkler, J. McGraw and K. Andrassy and discuss accounting and investor update, demand letters, potential litigation, claims process, and other cases related matters;	0.70	336.17
03/17/23	Kara B. Hendricks	Review deed of trust (Roshak) and follow-up with H. Agee to discuss same; Correspond with G. Winkler regarding title company/trustee involvement;	0.30	144.07
03/17/23	Kara B. Hendricks	Review minute order and update G. Winkler regarding hearing; Attention to email from K. Andrassy and J. Hall regarding claims motion;	0.20	96.05
03/21/23	Kara B. Hendricks	Review draft motion regarding claims deadline and provide comments to K. Andrassy and G. Winkler regarding same;	0.20	96.05
03/21/23	Kara B. Hendricks	Review status report and fee application for upcoming hearing;	0.20	96.05
03/22/23	Kara B. Hendricks	Review deed of trust and discuss with H. Agee regarding same; Forward same to G. Winkler with follow-up questions;	0.40	192.10
03/22/23	Kara B. Hendricks	Attention to emails from J. McGraw and K. Andrassy regarding employee schedules; Review draft letter seeking reimbursement amounts and provide feedback regarding same;	0.30	144.12
03/23/23	Kara B. Hendricks	Call with G. Winkler and J. McGraw to discuss pending matters including ARC entity corporate filings and litigation, document review by J. McGraw and issues arising from same relating to new entities and potential window for recovery and strategize regarding next steps;	1.00	480.25
03/24/23	Kara B. Hendricks	Follow-up with H. Agee regarding questions raised by G. Winkler regarding	0.10	48.02

03/27/23	Kara B. Hendricks	Roshak trustee; Follow-up with K. Ewing regarding motion and issues identified with related CapSource entities;	0.20	96.05
03/28/23	Kara B. Hendricks	Review updated deed of trust and correspond with G. Winkler regarding same; Send draft document to R. Ryan for Roshak signatures;	0.40	192.10
03/29/23	Kara B. Hendricks	Participate in call with J. McGraw, K. Andrassy and TX team to discuss case status including demand letters for payment, claims motion, and third party recovery issues;	0.40	192.10

Total Hours: 5.30

Total Amount: \$ 2,545.34

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	5.30	565.00	2,994.50
Totals:	5.30		\$ 2,994.50

**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	5.30	480.25	2,545.34
Totals:	5.30		\$ 2,545.34

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/23	Kara B. Hendricks	Attention to emails regarding claims form and procedure and follow-up with J. McGraw and K. Andrassy regarding same;	0.20	96.05
03/02/23	Kara B. Hendricks	Participate in discussion with J. Hall, J. McGraw, G. Winkler and K. Andrassy regarding claims process and issues to address in motion including notice and submittals and provide update regarding lien releases and Roshak issues;	0.50	240.12
03/06/23	Henry Agee	Preparation of deed of trust to secure settlement agreement	2.30	879.75
03/07/23	Henry Agee	Updated deed of trust with information from settlement agreement	0.80	306.00
03/10/23	Henry Agee	Further revision of deed of trust based on D. Edington comments and sent draft to K. Hendricks	0.30	114.75
03/10/23	David Edington	Review draft of deed of trust and provide comments to same; confer with H. Agee regarding same.	1.00	518.50
03/21/23	David Edington	Review revised draft of deed of trust and provide comments to H. Agee regarding same.	0.20	103.70
03/21/23	Kara B. Hendricks	Participate in status hearing and follow-up with G. Winkler regarding next steps;	0.50	240.12
03/24/23	Henry Agee	Research into trustee for K. Hendricks for use on deed of trust, contacted title company regarding acting as trustee.	0.80	306.00
03/24/23	David Edington	Call with H. Agee regarding deed of trust and trustee.	0.20	103.70
03/27/23	Henry Agee	Confirmed title company costs to act as trustee and prepared revised draft of deed of trust.	0.20	76.50
Total Hours:			7.00	
Total Amount:				\$ 2,985.19

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>
David Edington	1.40	610.00	854.00
Kara B. Hendricks	1.20	565.00	678.00
Henry Agee	4.40	450.00	1,980.00
Totals:	7.00		\$ 3,512.00

**Summary of Fees (Discounted Rates)**

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
David Edington	1.40	518.50	725.90
Kara B. Hendricks	1.20	480.24	576.29
Henry Agee	4.40	382.50	1,683.00
Totals:	7.00		\$ 2,985.19

TASK CODE: GW005 CLAIMS ADMINISTRATION AND OBJECTIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/29/23	Kara B. Hendricks	Review emails from K. Andrassy regarding account analysis;	0.10	48.02
03/30/23	Kara B. Hendricks	Revise letter to send to parties regarding lease or lien and correspond with J. McGraw regarding same;	0.20	96.05
03/31/23	Kara B. Hendricks	Attention to emails from K. Andrassy and J. McGraw regarding claims procedure and claim form issues;	0.20	96.05
Total Hours:			0.50	
Total Amount:				\$ 240.12

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	0.50	565.00	282.50
Totals:	0.50		\$ 282.50

**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	0.50	480.24	240.12
Totals:	0.50		\$ 240.12

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	1.40	610.00	854.00
Kara B. Hendricks	7.00	565.00	3,955.00
Henry Agee	4.40	450.00	1,980.00
Totals:	12.80		\$ 6,789.00

**Summary of Fees (Discounted Rates)**

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
David Edington	1.40	518.50	725.90
Kara B. Hendricks	7.00	480.25	3,361.75
Henry Agee	4.40	382.50	1,683.00
Totals:	12.80		\$ 5,770.65

Invoice No.: 1000298043  
Re: Profit Connect Receivership  
Matter No.: 209375.010200

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
03/06/23	VENDOR: First American Title Insurance Co - 6122 INVOICE#: 1601-1601110904 DATE: 3/6/2023 Preparation of documents and recording of lien release forms for 4 properties.	\$	1,266.75
	Total Expenses:	\$	<hr/> 1,266.75



# EXHIBIT "3"

1 Kyra E. Andrassy, Esq.  
Admitted *Pro Hac Vice*  
2 SMILEY WANG-EKVALL, LLP  
3200 Park Center Drive, Suite 250  
3 Costa Mesa, California 92626  
Telephone: (714) 445-1000  
4 Facsimile: (714) 445-1002  
kandrassy@swelawfirm.com

5 Kara B. Hendricks, Esq.  
6 Nevada Bar No. 07743  
GREENBERG TRAUIG, LLP  
7 10845 Griffith Peak Drive, Suite 600  
Las Vegas, NV 89135  
8 Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
9 [hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com)

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

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE  
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF KYRA E.  
ANDRASSY IN SUPPORT OF  
APPLICATION FOR ALLOWANCE AND  
PAYMENT OF FEES AND COSTS OF  
THE RECEIVER AND HIS  
PROFESSIONALS FOR THE PERIOD  
FROM JANUARY 1, 2023, THROUGH  
MARCH 31, 2023**

21  
22  
23 I, Kyra E. Andrassy, Esq. declare as follows:

24 1. I am over 21 years old and an attorney with and partner of Smiley Wang-Ekvall,  
25 LLP. I am licensed to practice in California and have been admitted pro hac vice for purposes of  
26 this case.

27 2. By virtue of my position with Smiley Wang-Ekvall, I am competent to testify to  
28 the matters presented in this declaration, and I submit this declaration in support of the

SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

1 Receiver’s application for approval of his fees and costs of my firm and those of his  
2 professionals in connection with Profit Connect Wealth Services, Inc. This declaration is based  
3 on my personal knowledge, except where made on information and belief, and as to those  
4 matters, I believe them to be true.

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

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

11 5. 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 information  
14 on a time sheet, or (2) inputting such information directly into the firm's computer billing system.

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

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

22 8. As reflected in the attached invoice, and pursuant to the Receivership Order (ECF  
23 No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46), professionals at  
24 Smiley-Wang Ekval assisted the Receiver as follows during the SWE Application Period:

25 (1) communicating with counsel for Bank of America regarding the remainder of its  
26 document production;

27 (2) revising the petition filed by Texas counsel regarding a Profit Connect agent  
28

1 (3) preparing a memorandum regarding evidence that may support a claim against a  
2 financial institution;

3 (4) reviewing evidence to support clawback actions against certain employees;

4 (5) preparing the status report; and

5 (6) formulating the claim procedures and beginning preparation of the motion to  
6 approve them. Smiley Wang-Ekvald has agreed to discount its standard billing rates in connect  
7 with this matter by 15 percent, and the fees being requested in this Application and the hourly rates  
8 on the invoice reflect this reduction.

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

10 Executed on June 9, 2023.

11 /s/ Kyra E. Andrassy

SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

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**ATTACHMENT**

Smiley Wang-Ekvall, LLP  
 3200 Park Center Drive, Suite 250  
 Costa Mesa, CA 92626  
 Phone: 714-445-1000

Geoff Winkler  
 Geoff Winkler  
 715 NW Hoyt St. #4364  
 Portland, OR 97208

April 04, 2023  
 Our File: WIN01.0001  
 Invoice # 27342

RE: Profit Connect

**Statement of account for services rendered through March 31, 2023**

**Previous Balance** **\$ 18,862.21**

**Professional Services**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/03/2023	KEA	01 - Asset Analysis and Recovery Prepare correspondence to counsel for Bank of America re subpoena	0.10	\$ 535.50/hr	\$ 53.55
01/09/2023	KEA	01 - Asset Analysis and Recovery Review correspondence from counsel for Bank of America re status of document production and timing re same	0.10	\$ 535.50/hr	\$ 53.55
01/09/2023	KEA	01 - Asset Analysis and Recovery Review document produced by BofA	0.20	\$ 535.50/hr	\$ 107.10
01/18/2023	KEA	01 - Asset Analysis and Recovery Prepare correspondence to N. Savino re status of remainder of production	0.10	\$ 535.50/hr	\$ 53.55
01/18/2023	KEA	01 - Asset Analysis and Recovery Meeting with co-counsel to strategize re various causes of action and mechanics of pursuing same	0.70	\$ 535.50/hr	\$ 374.85
01/19/2023	KEA	01 - Asset Analysis and Recovery Research re aiding and abetting claims	0.50	\$ 535.50/hr	\$ 267.75

Geoff Winkler

01/19/2023	KEA	01 - Asset Analysis and Recovery Complete revisions to petition re Texas litigation	0.40	\$ 535.50/hr	\$ 214.20
01/23/2023	KEA	01 - Asset Analysis and Recovery Review final production from Bank of America	0.20	\$ 535.50/hr	\$ 107.10
01/23/2023	KEA	01 - Asset Analysis and Recovery Prepare correspondence to client re Bank of America	0.10	\$ 535.50/hr	\$ 53.55
02/01/2023	KEA	01 - Asset Analysis and Recovery Revise second draft of petition re Texas litigation	0.70	\$ 535.50/hr	\$ 374.85
02/01/2023	KEA	01 - Asset Analysis and Recovery Prepare correspondence to Receiver re Texas litigation	0.10	\$ 535.50/hr	\$ 53.55
02/01/2023	KEA	01 - Asset Analysis and Recovery Telephone call with Receiver team re clawback actions and strategy and re claims procedures	0.60	\$ 535.50/hr	\$ 321.30
02/01/2023	KEA	01 - Asset Analysis and Recovery Review documents re potential insider transfer	0.10	\$ 535.50/hr	\$ 53.55
02/17/2023	KEA	01 - Asset Analysis and Recovery Prepare info for Westwing subpoena to BofA	0.20	\$ 535.50/hr	\$ 107.10
02/21/2023	JH	01 - Asset Analysis and Recovery Preparation of subpoena and document request re Bank of America and prepare notice of same	0.40	\$ 225.25/hr	\$ 90.10
02/21/2023	KEA	01 - Asset Analysis and Recovery Review and execute subpoena re Westwing	0.10	\$ 535.50/hr	\$ 53.55
03/14/2023	KEA	01 - Asset Analysis and Recovery Add to analysis started by M. Gall re facts re potential financial institution claim	1.20	\$ 535.50/hr	\$ 642.60
03/15/2023	KEA	01 - Asset Analysis and Recovery Meeting to discuss clawback strategies and potential third party claims	0.80	\$ 535.50/hr	\$ 428.40
03/21/2023	KEA	01 - Asset Analysis and Recovery Review employee recovery list and draft letter	0.20	\$ 535.50/hr	\$ 107.10
03/21/2023	KEA	01 - Asset Analysis and Recovery Review backup info re employee clawback actions	0.10	\$ 535.50/hr	\$ 53.55

Geoff Winkler

03/22/2023	KEA	01 - Asset Analysis and Recovery Review West Wing production from Bank of America and forward to J. Hall and J. McGraw	0.30	\$ 535.50/hr	\$ 160.65
03/23/2023	KEA	01 - Asset Analysis and Recovery Legal research re avoidability of overpaid wages or bonuses	0.60	\$ 535.50/hr	\$ 321.30
03/23/2023	KEA	01 - Asset Analysis and Recovery Revise avoidance letter to target it to employee issues	0.50	\$ 535.50/hr	\$ 267.75
03/29/2023	KEA	01 - Asset Analysis and Recovery Analysis of additional information to include in package re potential third party claims	0.30	\$ 535.50/hr	\$ 160.65
03/29/2023	KEA	01 - Asset Analysis and Recovery Meeting re status of third party demand letters and re claims procedures	0.40	\$ 535.50/hr	\$ 214.20
03/30/2023	KEA	01 - Asset Analysis and Recovery Revise most recent draft of demand letter re employee overpayments	0.20	\$ 535.50/hr	\$ 107.10
		<b>01 - Asset Analysis and Recovery Totals</b>	<b>8.80</b>	<b>@ \$ 535.50/hr</b>	<b>\$ 4,712.40</b>
			<b>0.40</b>	<b>@ \$ 225.25/hr</b>	<b>\$ 90.10</b>
			<b>9.20</b>		<b>\$ 4,802.50</b>
01/03/2023	KEA	04 - Case Administration Review draft portion of status report and comment on litigation section	0.10	\$ 535.50/hr	\$ 53.55
01/12/2023	KEA	04 - Case Administration Exchange of correspondence with Receiver re item to address in status report re cost payments	0.10	\$ 535.50/hr	\$ 53.55
01/27/2023	KEA	04 - Case Administration Made additional revisions to status report	0.30	\$ 535.50/hr	\$ 160.65
03/01/2023	KEA	04 - Case Administration Telephone call with SEC re status of case	0.20	\$ 535.50/hr	\$ 107.10
03/21/2023	KEA	04 - Case Administration Attendance at fee hearing/status conference on 4th quarter 2022 report	0.30	\$ 535.50/hr	\$ 160.65
		<b>04 - Case Administration Totals</b>	<b>1.00</b>	<b>@ \$ 535.50/hr</b>	<b>\$ 535.50</b>



			<b>1.00</b>		<b>\$ 535.50</b>
01/27/2023	KEA	05 - Claims Administration/Objections Revise claim form, notice, and instructions	0.90	\$ 535.50/hr	\$ 481.95
03/01/2023	KEA	05 - Claims Administration/Objections Review revised claim form	0.10	\$ 535.50/hr	\$ 53.55
03/01/2023	MLS	05 - Claims Administration/Objections Prepare motion to approve claim procedures	1.60	\$ 331.50/hr	\$ 530.40
03/02/2023	MLS	05 - Claims Administration/Objections Prepare claim procedures motion	1.40	\$ 331.50/hr	\$ 464.10
03/02/2023	MLS	05 - Claims Administration/Objections Zoom meeting with receiver and team re claim procedures motion and other case issues	0.30	\$ 331.50/hr	\$ 99.45
03/15/2023	MLS	05 - Claims Administration/Objections Review proposed claim form	0.10	\$ 331.50/hr	\$ 33.15
03/15/2023	MLS	05 - Claims Administration/Objections Review forensic accounting report for claim procedures motion	0.40	\$ 331.50/hr	\$ 132.60
03/15/2023	MLS	05 - Claims Administration/Objections Prepare claim procedures motion	2.10	\$ 331.50/hr	\$ 696.15
03/16/2023	MLS	05 - Claims Administration/Objections Prepare proposed notice of claims bar date	0.70	\$ 331.50/hr	\$ 232.05
03/16/2023	KEA	05 - Claims Administration/Objections Revise claims procedure motion re summary claims procedures	0.60	\$ 535.50/hr	\$ 321.30
03/16/2023	KEA	05 - Claims Administration/Objections Revise most recent claims form and notice of claims deadline	0.20	\$ 535.50/hr	\$ 107.10
03/16/2023	KEA	05 - Claims Administration/Objections Prepare correspondence to Receiver	0.10	\$ 535.50/hr	\$ 53.55

Geoff Winkler

		re draft claim procedures motion			
03/16/2023	MLS	05 - Claims Administration/Objections Prepare claim procedures motion	1.70	\$ 331.50/hr	\$ 563.55
03/17/2023	KEA	05 - Claims Administration/Objections Finalize claims procedure motion and prepare correspondence to SEC re same	0.20	\$ 535.50/hr	\$ 107.10
03/31/2023	KEA	05 - Claims Administration/Objections Review info from Josh McGraw re KCC claim procedures and prepare correspondence to him re revisions to claim form and motion and call re same	0.20	\$ 535.50/hr	\$ 107.10
		<b>05 - Claims</b>	<b>2.30</b>	<b>@ \$ 535.50/hr</b>	<b>\$ 1,231.65</b>
		<b>Administration/Objections Totals</b>			
			<b>8.30</b>	<b>@ \$ 331.50/hr</b>	<b>\$ 2,751.45</b>
			<b>10.60</b>		<b>\$ 3,983.10</b>
01/18/2023	KEA	10 - Litigation Revise Texas state court petition	0.50	\$ 535.50/hr	\$ 267.75
		<b>10 - Litigation Totals</b>	<b>0.50</b>	<b>@ \$ 535.50/hr</b>	<b>\$ 267.75</b>
			<b>0.50</b>		<b>\$ 267.75</b>
01/27/2023	KEA	13 - Fee Applications Prepare insert to fee application	0.40	\$ 0.00/hr	No Charge
01/30/2023	KEA	13 - Fee Applications Prepare declaration ISO fee application (no charge)	0.20	\$ 0.00/hr	No Charge
		<b>13 - Fee Applications Totals</b>	<b>0.60</b>	<b>@ \$ 0.00/hr</b>	<b>\$ 0.00</b>
			<b>0.60</b>		<b>\$ 0.00</b>
		<b>Total Professional Services</b>	<b>21.90</b>		<b>\$ 9,588.85</b>
<b>Costs And Disbursements</b>					
<u>Date</u>		<u>Description</u>			<u>Amount</u>
02/21/2023		Copies: Service of Notice of Subpoena re Bank of America			\$ 2.20
		<b>Copies Totals</b>			<b>\$ 2.20</b>

Geoff Winkler

02/21/2023	Postage: Service of Notice of Subpoena re Bank of America	\$ 0.84
	<b>Mailing/Postage Totals</b>	<b>\$ 0.84</b>
03/22/2023	Bank Of America: Legal order processing	\$ 30.40
	<b>Miscellaneous Totals</b>	<b>\$ 30.40</b>
01/12/2023	Pacer Online Research	\$ 2.20
03/02/2023	Pacer Online Research	\$ 5.10
	<b>Pacer Fee Totals</b>	<b>\$ 7.30</b>
03/02/2023	West Law Online Research	\$ 4.15
03/15/2023	West Law Online Research	\$ 15.39
03/23/2023	West Law Online Research	\$ 27.85
	<b>West Law Totals</b>	<b>\$ 47.39</b>
	<b>Total Costs and Disbursements</b>	<b>\$ 88.13</b>

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<b>Total Current Charges</b>	<b>\$ 9,676.98</b>
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**Summary Of Account**

Balance Forward	\$ 18,862.21
Total Current Charges	\$ 9,676.98
Less Payments And Credits	
	3/21/2023 Payment - Wire Transfer (\$7,484.36)
<b>Balance Due</b>	<b>\$ 21,054.83</b>

---

**Notes:**

Wire Transfer Instructions:  
City National Bank  
555 South Flower Street  
Los Angeles, CA 90071  
Routing Number: 122016066  
Account Number: 023904985

Geoff Winkler

**Trust Account Summary**

**Billing Period: 01/03/2023 - 04/04/2023**

**Client: Geoff Winkler | General Matter Trust**

<b>Total Deposits</b>	<b>Total Disbursements</b>	<b>Current Balance</b>
\$0.00	\$0.00	\$0.00

<b>Date</b>	<b>Transaction</b>	<b>Deposit</b>	<b>Disbursement</b>	<b>Balance</b>
No activity for this billing period.				

**User Hours Summary**

**Billing Period: 01/03/2023 - 03/31/2023**

**User Hour Totals**

<b>User Initials</b>	<b>User</b>	<b>Hours Billed</b>	<b>Rate/Hour</b>	<b>Amount Billed</b>
KEA	Kyra E Andrassy	0.60	\$ 0.00	\$ 0.00
KEA	Kyra E Andrassy	12.60	\$ 535.50	\$ 6,747.30
JH	Janet Hogan	0.40	\$ 225.25	\$ 90.10
MLS	Michael L Simon	8.30	\$ 331.50	\$ 2,751.45
Totals		21.90		\$ 9,588.85

# EXHIBIT "4"

1 Kyra E. Andrassy, Esq.  
Admitted *Pro Hac Vice*  
2 SMILEY WANG-EKVALL, LLP  
3200 Park Center Drive, Suite 250  
3 Costa Mesa, California 92626  
Telephone: (714) 445-1000  
4 Facsimile: (714) 445-1002  
kandrassy@swelawfirm.com

5 Kara B. Hendricks, Esq.  
6 Nevada Bar No. 07743  
GREENBERG TRAUIG, LLP  
7 10845 Griffith Peak Drive, Suite 600  
Las Vegas, NV 89135  
8 Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
9 [hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com)

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

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE  
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF ERICKA BROWNE  
IN SUPPORT OF APPLICATION FOR  
ALLOWANCE AND PAYMENT OF FEES  
AND COSTS OF THE RECEIVER AND  
HIS PROFESSIONALS FOR THE  
PERIOD FROM JANUARY 1, 2023,  
THROUGH MARCH 31, 2023**

21  
22  
23 I, Ericka Browne, declare as follows:

24 1. I am over 21 years old and Vice President of Technology Concepts & Design, Inc.  
25 ("TCDI"). By virtue of my position with TCDI, I am competent to testify to the matters presented  
26 in this declaration, and I submit this declaration in support of the Receiver's application for  
27 approval of his fees and costs of my firm and those of his professionals in connection with Profit  
28

SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

1 Connect Wealth Services, Inc. This declaration is based on my personal knowledge, except where  
2 made on information and belief, and as to those matters, I believe them to be true.

3 2. Attached to this declaration is a true and correct copy of the invoices for the  
4 services of my firm for the period from January 1, 2023, through March 31, 2023 (the  
5 “Application Period”). TCDI acquired Stroz Friedberg's electronic discovery business prior to  
6 the Application Period, and will continue to provide those services pursuant to the contract  
7 previously signed by the Receiver with Stroz Friedberg as it pertains to electronic discovery.

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

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

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

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

21 7. As reflected in the attached invoice, and pursuant to the Receivership Order (ECF  
22 No. 26) and the Order Authorizing Employment of Computer Forensic Experts (ECF No. 46),  
23 professionals at TCDI assisted the Receiver during the Application Period with management of  
24 the electronic discovery database.

25 8. Electronic Discovery Project managers are billed at \$195 per hour and engineers  
26  
27  
28



1 are billed at \$400 per hour.

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

3 Executed on June 9, 2023.

4 /s/ Ericka Browne

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SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

**ATTACHMENT**



# Invoice

Page 1 of 1

Technology Concepts & Design, Inc.  
4508 Weybridge Lane  
Greensboro NC 27407  
United States  
(336) 232-5800

**Date** 1/31/2023  
**TCDI Invoice #** AFS-01-2023-VCI

**Terms** Net 90  
**Due Date** 5/1/2023  
**Currency** USA

**Bill To:**

American Fiduciary Services LLC  
715 Nw Hoyt St. #4364  
Portland OR 97208  
United States

**Project** American Fiduciary - Project Valeria - Communication Intelligence  
**Matter ID**  
**Memo** January 2023 Professional Services

**Billing Emails** geoff@americanfiduciaryservices.com;  
anna@americanfiduciaryservices.com;  
Sergio.Kopelev@strozfriedberg.com

Item	Description	Qty	Units	Rate	Amount
User License(s)	User License(s)	6	User	85.00	510.00
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

**Total USA** **\$8,583.10**

**Bank Details:**

Bank Name: Truist Bank  
Bank Account Name: Technology Concepts & Design, Inc.  
Bank SWIFT: BRBTUS33  
ACH Bank Routing (ABA) #: 021052053  
ACH Bank Account Number: 39876408

For Wiring Instructions, email request to AR@tcdi.com

**Remit Check Payment To:**

Technology Concepts & Design, Inc.  
Attn: Accounts Receivable  
4508 Weybridge Lane  
Greensboro NC 27407  
(336) 232-5807

Please include Invoice # with your check.



# Invoice

Page 1 of 1

Technology Concepts & Design, Inc.  
 4508 Weybridge Lane  
 Greensboro NC 27407  
 United States  
 (336) 232-5800

**Date** 2/28/2023  
**TCDI Invoice #** AFS-02-2023-VCI

**Terms** Net 90  
**Due Date** 5/29/2023  
**Currency** USA

**Bill To:**

American Fiduciary Services LLC  
 715 Nw Hoyt St. #4364  
 Portland OR 97208  
 United States

**Project** American Fiduciary - Project Valeria - Communication Intelligence  
**Matter ID**  
**Memo** February 2023 Professional Services

**Billing Emails** geoff@americanfiduciaryservices.com;  
 anna@americanfiduciaryservices.com;  
 Sergio.Kopelev@strozfriedberg.com

Item	Description	Qty	Units	Rate	Amount
User License(s)	User License(s)	6	User	85.00	510.00
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

**Total USA \$8,583.10**

**Bank Details:**

Bank Name: Truist Bank  
 Bank Account Name: Technology Concepts & Design, Inc.  
 Bank SWIFT: BRBTUS33  
 ACH Bank Routing (ABA) #: 021052053  
 ACH Bank Account Number: 39876408

For Wiring Instructions, email request to AR@tcdi.com

**Remit Check Payment To:**

Technology Concepts & Design, Inc.  
 Attn: Accounts Receivable  
 4508 Weybridge Lane  
 Greensboro NC 27407  
 (336) 232-5807

Please include Invoice # with your check.



# Invoice

Page 1 of 2

Technology Concepts & Design, Inc.  
4508 Weybridge Lane  
Greensboro NC 27407  
United States  
(336) 232-5800

**Date** 3/31/2023  
**TCDI Invoice #** AFS-03-2023-VCI

**Terms** Net 90  
**Due Date** 6/29/2023  
**Currency** USA

## Bill To:

American Fiduciary Services LLC  
715 Nw Hoyt St. #4364  
Portland OR 97208  
United States

**Project** American Fiduciary - Project Valeria - Communication Intelligence  
**Matter ID**  
**Memo** March 2023 Professional Services

**Billing Emails** geoff@americanfiduciaryservices.com;  
anna@americanfiduciaryservices.com;  
Sergio.Kopelev@strozfriedberg.com

## Summary:

Item	Description	Qty	Units	Rate	Amount
Billable Time	Project Management (AdServ)	0.3	HR	195.00	58.50
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10
User License(s)	User License(s)	6	User	85.00	510.00
				<b>Total USA</b>	<b>\$8,641.60</b>

## Bank Details:

Bank Name: Truist Bank  
Bank Account Name: Technology Concepts & Design, Inc.  
Bank SWIFT: BRBTUS33  
ACH Bank Routing (ABA) #: 021052053  
ACH Bank Account Number: 39876408

For Wiring Instructions, email request to AR@tcdi.com

## Remit Check Payment To:

Technology Concepts & Design, Inc.  
Attn: Accounts Receivable  
4508 Weybridge Lane  
Greensboro NC 27407  
(336) 232-5807

Please include Invoice # with your check.



# Invoice

Page 2 of 2

**Detail:**

Item	Date	Initials	Description	Qty	Units	Rate	Amount
Billable Group			Billable Time				
Project Management (AdServ)	3/1/2023	EMB	Review and approve updated Declaration in preparation for filing of fee application.	0.3	HR	195.00	58.50
Subtotal							58.50
			Total Billable Time				58.50
Hosting (per GB)			Hosting (per GB)	807.31	GB	10.00	8,073.10
User License(s)			User License(s)	6	User	85.00	510.00
<b>Total USA</b>							<b>\$8,641.60</b>

**Bank Details:**

Bank Name: Truist Bank  
 Bank Account Name: Technology Concepts & Design, Inc.  
 Bank SWIFT: BRBTUS33  
 ACH Bank Routing (ABA) #: 021052053  
 ACH Bank Account Number: 39876408

For Wiring Instructions, email request to AR@tcdi.com

**Remit Check Payment To:**

Technology Concepts & Design, Inc.  
 Attn: Accounts Receivable  
 4508 Weybridge Lane  
 Greensboro NC 27407  
 (336) 232-5807

Please include Invoice # with your check.

# EXHIBIT "5"

1 Kyra E. Andrassy, Esq.  
Admitted *Pro Hac Vice*  
2 SMILEY WANG-EKVALL, LLP  
3200 Park Center Drive, Suite 250  
3 Costa Mesa, California 92626  
Telephone: (714) 445-1000  
4 Facsimile: (714) 445-1002  
kandrassy@swelawfirm.com

5 Kara B. Hendricks, Esq.  
6 Nevada Bar No. 07743  
GREENBERG TRAUIG, LLP  
7 10845 Griffith Peak Drive, Suite 600  
Las Vegas, NV 89135  
8 Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
9 hendricksk@gtlaw.com

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

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE  
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF STACY CHIANG IN  
SUPPORT OF APPLICATION FOR  
ALLOWANCE AND PAYMENT OF FEES  
AND COSTS OF THE RECEIVER AND  
HIS PROFESSIONALS FOR THE  
PERIOD FROM JANUARY 1, 2023,  
THROUGH MARCH 31, 2023**

21  
22  
23 I, Stacy Chiang. declare as follows:

24 1. I am over 21 years old and a director with Baker Tilly US, LLP, it its global  
25 forensics and litigation services practice.

26 2. By virtue of my position with Baker Tilly, I am competent to testify to the matters  
27 presented in this declaration, and I submit this declaration in support of the Receiver’s  
28 application for approval of his fees and costs of my firm and those of his professionals in

SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002



SMILEY WANG-EKVALL, LLP  
3200 PARK CENTER DRIVE, SUITE 250  
COSTA MESA, CALIFORNIA 92626  
(714) 445-1000 FAX (714) 445-1002

1 connection with Profit Connect Wealth Services, Inc. This declaration is based on my personal  
2 knowledge, except where made on information and belief, and as to those matters, I believe them  
3 to be true.

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

7 4. In the ordinary course of Baker Tilly's business, we keep a record of all time  
8 expended by our professionals in the rendering of professional services on a computerized billing  
9 system.

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

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

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

21 8. As reflected in the attached invoice, and pursuant to the Receivership Order (ECF  
22 No. 26) and the Order Authorizing Employment of Baker Tilly (ECF No. 76), professionals at  
23 Baker Tilly filed an extension request and did some tax planning work.

24 9. Baker Tilly has discounted its invoiced rates from its standard rates.

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

26 Executed on June 9, 2023.

27 /s/ Stacy Chiang

28

**ATTACHMENT**

Baker Tilly US, LLP  
 3655 Nobel Drive Suite 300  
 San Diego, CA 92122 • 858 597 4100



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

**Invoice Date:** April 20, 2023  
**Invoice Number:** BT2379832  
**Client Number:** 242674

**INVOICE**

**AMOUNT**

<b>Fees</b>	
<b>SEC v. Profit Connect, et al.</b>	\$429.50
Professional services rendered from January 1, 2023 through March 31, 2023 (see attached details).	
<b>Fees Total:</b>	\$429.50
<b>Expenses Total:</b>	\$4.60
<b>Invoice Total:</b>	<b>\$434.10</b>

For questions, comments or suggestions, please contact Suzy Ramirez at 858 597 4100.

**Balance is payable upon receipt or previously agreed upon terms.**

**To pay by Credit Card, Debit Card, or EFT using your Checking Account visit [www.bakertilly.com/payment](http://www.bakertilly.com/payment).  
 There is 3.5% surcharge on all Credit Card payments. There is no fee for Debit Card or EFT Payments.**

<b>Please ACH or wire payment to:</b> US Bank, Milwaukee, WI Routing No: 075000022 Account No: 312220280 Reference #: BT2379832	<b>Or send payment to:</b> Baker Tilly US, LLP PO Box 511563 Los Angeles, CA 90051-8118	<b>Reference:</b> Client Number: 242674 Invoice Number: BT2379832 Amount Enclosed: \$_____
---	--	---

SEC v. Profit Connect, et al.

Services rendered from January 1, 2023 through March 31, 2023



Date	Professional	Category	Detail	Hours	Rate	Amount
01/11/23	Chiang, S	Tax Analysis	Meet with Receiver's team re case planning, tax issues, etc. and follow up.	0.20	\$ 395.00	\$ 79.00
01/11/23	Castle, E	Tax Analysis	Review case/tax issues for 2022 returns, attention to transactions anticipated for 2023.	0.30	\$ 360.00	\$ 108.00
01/26/23	Chiang, S	G&A Matters	Review/research/respond to counsel in re fee application, charges for Q4, etc.	0.20	\$ 395.00	\$ 79.00
03/14/23	Calvillo, N	Tax Analysis	Review/gather information for preparation of extension.	0.20	\$ 225.00	\$ 45.00
03/15/23	Chiang, S	Tax Analysis	Attention to tax planning, correspondence with Receiver's office and extension draft/filing for returns.	0.30	\$ 395.00	\$ 118.50
<b>Total Professional Fees</b>				<b>1.20</b>		<b>\$ 429.50</b>
<b>Expenses</b>						
01/23/23			PACER for Q4 2022			\$ 4.60
<b>Total Expenses</b>						<b>\$ 4.60</b>
<b>Total Professional Services and Expenses</b>						<b>\$ 434.10</b>

**Professional Fees by Professional**

Professional	Title	Hours	Rate	Amount
Nicole Calvillo	Manager	0.20	\$ 225.00	\$ 45.00
Eileen Castle, CPA, CFE, CIRA	Senior Manager	0.30	\$ 360.00	\$ 108.00
Stacy Elledge Chiang, CPA/CFF, CIRA	Director	0.70	\$ 395.00	\$ 276.50
		<b>1.20</b>	<b>\$ 357.92</b>	<b>\$ 429.50</b>

**Professional Fees by Task Code**

Category	Description	Hours	Rate	Amount
Tax Analysis	Tax research, analysis and planning.	1.00	\$ 350.50	\$ 350.50
G&A Matters	Attention to planning, deadlines. Correspondence with counsel re general and administrative matters.	0.20	\$ 395.00	\$ 79.00
		<b>1.20</b>	<b>\$ 357.92</b>	<b>\$ 429.50</b>

**CERTIFICATE OF SERVICE**

1 At the time of service, I was over 18 years of age and not a party to this action. I  
2 am employed in the County of Orange, State of California. My business address is 3200  
Park Center Drive, Suite 250, Costa Mesa, CA 92626.

3 On **6/9/2023**, I served true copies of the following document(s) described as

4 **APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND COSTS OF THE RECEIVER AND HIS**  
5 **PROFESSIONALS FOR THE PERIOD FROM JANUARY 1, 2023, THROUGH MARCH 31, 2023**

6 on the interested parties in this action as follows:

7 **SEE ATTACHED SERVICE LIST**

8 **(X) (BY COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”))**. Pursuant to Fed. R.  
9 Civ. P. 5(b), the foregoing document will be served by the court via NEF and hyperlinked  
10 to the document. On **6/9/23**, I checked the CM/ECF docket for this case and determined  
that the aforementioned person(s) are on the Electronic Mail Notice List to receive NEF  
transmission at the email address(es) indicated.

11 **(X) (BY U.S. MAIL)**. I enclosed the document(s) in a sealed envelope or package and  
12 placed the envelope for collection and mailing, following our ordinary business practices.  
I am readily familiar with the practice of Smiley Wang-Ekvall, LLP for collecting and  
13 processing correspondence for mailing. On the same day that correspondence is placed  
for collection and mailing, it is deposited in the ordinary course of business with the  
14 United States Postal Service, in a sealed envelope with postage fully prepaid. I am a  
resident or employed in the county where the mailing occurred. The envelope was  
placed in the mail at Costa Mesa, California.

15 **( ) (BY E-MAIL)**. By scanning the document(s) and then e-mailing the  
16 resultant pdf to the e-mail address indicated above per agreement. Attached to  
this declaration is a copy of the e-mail transmission.

17 **( ) (BY FACSIMILE)**. I caused the above-referenced documents to be  
18 transmitted to the noted addressee(s) at the fax number as stated. Attached to this  
declaration is a "TX Confirmation Report" confirming the status of transmission.  
19 Executed on \_\_\_\_\_, at Costa Mesa, California.

20 **( ) STATE** I declare under the penalty of perjury under the laws of the State of  
21 California that the above is true and correct.

22 **(X) FEDERAL** I declare that I am employed in the office of a member of the bar  
23 of this court at whose direction the service was made.

24 Executed on June 9, 2023, at Costa Mesa,  
25 California;

*/s/ Lynnette Garrett*

\_\_\_\_\_  
Lynnette Garrett

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*American Fiduciary Services*

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE  
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**ORDER GRANTING APPLICATION FOR  
ALLOWANCE AND PAYMENT OF FEES  
AND COSTS OF THE RECEIVER AND  
HIS PROFESSIONALS FOR THE  
PERIOD FROM JANUARY 1, 2023,  
THROUGH MARCH 31, 2023**

21  
22  
23 The Court having reviewed the *Application for Allowance and Payment of Fees and Costs*  
24 *of the Receiver and His Professionals for the Period from January 1, 2023, Through March 31,*  
25 *2023* (the "Application") and the Court having found that notice was proper and that cause exists  
26 to approve the Application

27 **IT IS ORDERED AS FOLLOWS:**

1 (1) Geoff Winkler (the "Receiver") and American Fiduciary Services are allowed  
2 \$59,723.50 in fees and \$1,660.89 in costs;

3 (2) Greenberg Traurig is allowed \$12,038.53 in fees and \$1,279.72 in costs;

4 (3) Smiley Wang-Ekvall, LLP, is allowed \$9,588.85 in fees and costs of \$88.13;

5 (4) Technology Concepts & Design, Inc. is allowed fees of \$58.50 and costs of  
6 \$25,807.80;

7 (5) Baker Tilly is allowed \$429.50 in fees and \$4.60 in costs; and

8 (6) The Receiver is authorized to pay 80% of the allowed fees and 100% of the allowed  
9 costs from funds on hand in the receivership estate.

10 **IT IS SO ORDERED.**

11 \_\_\_\_\_  
12 DATED: \_\_\_\_\_

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