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

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**TWELFTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM APRIL 1, 2024, THROUGH
JUNE 30, 2024**

Geoff Winkler of American Fiduciary Services, LLC, the permanent receiver (the “Receiver”) over Profit Connect Wealth Services, Inc., and any subsidiaries and affiliates (together, “Profit Connect”) pursuant to an order entered on August 6, 2021 (the “Receiver Order”), submits this Twelfth Application for Allowance and Payment of Fees and Costs of the Receiver and His Professionals For the Period From April 1, 2024, Through, June 30, 2024

(“Twelfth Application”), for the fees and costs of the professionals he employed to assist him in fulfilling his duties under the Receiver Order. The period of time covered by this Application is from April 1, 2024, through June 30, 2024 (the "Application Period").

MEMORANDUM OF POINTS AND AUTHORITIES

Because the Receiver is not a licensed attorney, does not have in-house counsel, and is not a computer expert, he employed professionals to assist him in fulfilling his duties as the Receiver. Specifically, pursuant to Section X.G. of the Receiver Order, he retained Smiley Wang-Ekvall, LLP, and Ballard Spahr, LLP, as counsel and Stroz Friedberg as his computer forensic experts. The Court approved their employment by order entered on September 21, 2021. In 2022, Maria Gall resigned from Ballard Spahr after her appointment to the bench, so the Court approved the Receiver's retention of Greenberg Traurig as Nevada counsel. In early 2024, Kyra Andrassy moved from Smiley Wang-Ekvall, LLP, to Raines Feldman Littrell, LLP, so the Receiver retained Raines Feldman and the Court approved this employment. In late 2023, Technology Concepts & Design, Inc. (“TCDI”) acquired Stroz Friedberg’s electronic discovery business and will continue to provide those services pursuant to the contract previously signed by the Receiver with Stroz Friedberg as it pertains to electronic discovery.

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

- (1) \$51,651.50 in fees and \$3,726.85 in costs for the Receiver;
- (2) \$21,475.24 in fees and \$46.49 in costs for Greenberg Traurig;
- (3) \$9,157.05 in fees for Raines Feldman Littrell, LLP.
- (4) \$5,669.00 in fees in costs for Baker Tilly, LLP; and
- (5) \$27,386.80 for licensing and hosting costs for TCDI

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

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

...

I. RELEVANT BACKGROUND AND PROCEDURAL HISTORY

The SEC initiated this action against Profit Connect, Joy Kovar, and Brent Kovar on July 8, 2021, by the sealed, ex parte filing of a complaint and motion for temporary restraining order seeking, among other things, the freezing of defendants' assets and the appointment of a receiver over Profit Connect. The Court granted the ex parte temporary restraining order, in part, by allowing the asset freeze to proceed but set the motion for a hearing in order to provide defendants an opportunity to be heard on the temporary receivership request.

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

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

As of June 30, 2024, the Receiver is holding \$10,251,502.76 in cash. The fees incurred during the Application Period generated revenues for the estate in the Application Period and are expected to continue to result in the generation of additional recoveries for the estate in excess of the fees incurred. As was set forth in the motion to approve the employment of the professionals and because receivership work is a form of public service, each of the professionals has agreed to discount their typical hourly rate by 15%, and this discount is reflected in the fees being sought in this Application.

II. LEGAL AUTHORITY

"The power of a district court to impose a receivership ... derives from the inherent power of a court of equity to fashion effective relief."¹ "The primary purpose of equity receiverships is to promote orderly and efficient administration of the Receivership Estate by the district court for ...

¹ *SEC v. Wencke*, 622 F.2d 1363, 1369 (9th Cir. 1980).

the benefit of creditors.”² “[T]he practice in administering an estate by a receiver ... must accord with the historical practice in federal courts or with a local rule.”³

As the Ninth Circuit explained:

A district court’s power to supervise an equity receivership and to determine the appropriate action to be taken in the administration of the receivership is extremely broad. The district court has broad powers and wide discretion to determine the appropriate relief in an equity receivership. The basis for this broad deference to the district court’s supervisory role in equity receiverships arises out of the fact that most receiverships involve multiple parties and complex transactions.⁴

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

III. THE FEES AND COSTS BEING REQUESTED

As set forth in prior applications, in evaluating the fees and costs of the Receiver and his professionals, the fact that Profit Connect had no books and records, including books of account, or any functioning accounting department must be taken into account. The absence of these records means that the Receiver and his team were forced to get the documents from third parties that they need to determine what happened with funds put in by investors. This has required the issuance of subpoenas to third parties, including financial institutions, and often ensuing

² *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986.)

³ Fed. R. Civ. P. 66.

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

⁵ *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)).

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

discussions with the subpoenaed parties about the scope or timing of the requested production. It also means that the Receiver has had to recreate accounting records by reconstructing the entity's financials using financial statements and offsetting financial records. This process is now complete and during the Application Period a hearing was held on the Receiver's Motion for Order in Aid of Receivership Allowing and Disallowing Claims (ECF No. 191). Thereafter, the Receiver developed an interim distribution plan and his counsel prepared a motion seeking approval of the same (ECF No. 198) and a hearing is set on August 26, 2024. The Receiver continues to focus on identifying and pursuing potential claims held by the receivership estate against third parties.

The foregoing highlights some of the actions the Receiver and his legal professionals have been constrained to undertake early in this case and which drives their fees. That said, the Receiver's prompt action in reconstructing Profit Connect's financial records assisted in his preservation and marshalling of Profit Connect property, including over \$10 million dollars in cash and equivalents and a recovery of more than \$10 million in personal property assets.

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

a. THE RECEIVER

[Fees of \$51,651.50 and costs of \$3,726.85]

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

...

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

- Continued review and analysis of documents and materials retrieved for third party recovery evaluation and pursued claims against credit card companies;
- Preparation of documents to facilitate sale of real property;
- Continued to review documents and interview parties to determine potential litigation against third parties;
- Continued efforts on third party recovery with former employees who received funds or gifts from Profit Connect in excess of their W-2 wages;
- Continued efforts on third party recovery with agents who received bonuses or commissions for bringing investors into Profit Connect;
- Continued efforts with Levine Kellogg Lehman Schneider to investigate and pursue claims against financial institutions;
- Continued efforts with Texas litigation counsel to pursue actions against certain agents of Profit Connect; and
- Continued efforts to pursue legal malpractice claim.

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	51.1	\$340.00	\$17,374.00
John Hall	Accountant	10.7	\$310.00	\$3,317.00
Milana Barkhanoy	Associate	.8	\$255.00	\$204.00
Josh McGraw	Associate	102.3	\$255.00	\$26,086.50
Grace Radke	Associate	.3	\$225.00	\$67.50
Phil Chen	Associate	.3	\$215.00	\$64.50
Anna Priebe	Associate	16.6	\$215.00	\$3,569.00
Renee Dieffenderfer	Associate	1.0	\$255.00	\$255.00
Sara Bond	Associate	2.8	\$255.00	\$714.00
Total		185.9		\$51,651.50

Due to its broad range of experience and expertise, AFS performs almost all required work in-house, saving both time and money, including tasks involving corporate accounting, forensic accounting, case administration, claims administration, asset valuation, investor communication 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 allows AFS to minimize the cost to complete all work associated with the case, ensuring a maximum return to stakeholders involved in the matter while also preserving the quality of our work product. AFS does not bill for travel time in regulatory cases.

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

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

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

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

<i>Category</i>	<i>Total Cost</i>
Airfare	\$2,575.59
Automotive Expense	\$173.13
Courier/Shipping	\$48.14
Document and Asset Storage	\$243.75
Hotel	\$209.75
Internet/Online Fees	\$32.49
Miscellaneous	\$444.00
<i>Total</i>	<i>\$3,726.85</i>

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

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

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

b. GREENBERG TRAURIG

[Fees of \$21,475.24 and Costs of \$46.49]

During the Application Period, Greenberg Traurig ("GT") assisted the Receiver as follows during the Application Period: assessing potential claw-back actions; communication with promoters and effort to resolve claims outside of litigation; assisting with preparation and filing of status reports; preparation of stipulations to sale remaining real property and communication with SEC regarding same; working with outside counsel on third party litigation matters; preparation of motion to approve potential settlement with Allianz and attend hearing regarding same. GT and Raines Feldman Littrell continue to coordinate their efforts to avoid any duplication of services.

GT has discounted its standard fees by 15%, and seeks \$21,475.24 in discounted fees.

GT's invoices are included with the Declaration of Kara Hendricks attached as **Exhibit 2**.

c. RAINES FELDMAN LITTRELL LLP

[Fees of \$9,157.05]

Raines Feldman Littrell began providing services to the Receiver on January 16, 2024. During the Application Period, the Firm continued to negotiate resolutions with two credit card companies regarding constructive fraudulent transfer claims against them. One of these has resulted in a settlement that is in the process of being documented. The Firm also finalized the motion to allow claims, which was granted by the Court. With claim allowance resolved, the Firm began work on a motion to make an interim distribution. The Firm also revised the status report

for the prior period and provided input into the claims against Bank of America and the pending Texas litigation. Raines Feldman Littrell incurred a total of \$9,157.05 in connection with these efforts, which reflect a 15% discount off of the standard hourly rates.

Raines Feldman Littrell's invoices are included with the Declaration of Kyra Andrassy attached as **Exhibit 3**.

d. TECHNOLOGY CONCEPTS & DESIGN, INC.

[Licensing and Hosting Costs of \$27,386.80]

As a result of an acquisition of assets from Stroz Friedberg and other affiliates of Aon PLC, Technology Concepts & Design, Inc. ("TCDI") now provides eDiscovery services to the Receiver. During the Application Period and because of the size of the data being hosted, TCDI charged hosting costs of \$24,219.30, user license costs of \$85.00, and project manager costs related to management and maintenance of the database in the amount of \$2,827.00.

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

e. BAKER TILLY

[Costs of \$5,669.00]

During the Application Period, Baker Tilly analyzed transaction data, provided tax planning services and guidance to the Receiver, and prepared and issued the receivership estate's 2023 tax returns. This will be the final invoice from Baker Tilly in this matter as Baker Tilly is in the process of discontinuing its restructuring services, including receivership services.

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

IV. CONCLUSION

Based on the foregoing and pursuant to Section X.G. of the Receiver Order, the Receiver and his professionals request entry of an order:⁷

(1) Allowing the Receiver \$51,651.50 in fees and \$3,726.85 in costs for the Application Period;

⁷ The form of the order is attached as Exhibit 6.

(2) Allowing Greenberg Traurig \$21,475.24 in fees and \$46.49 in costs for the Application Period;

(3) Allowing Raines Feldman Littrell LLP \$9,157.05 in fees for the Application Period;

(4) Allowing TCDI \$27,386.80 for the Application Period;

(5) Allowing Baker Tilly \$5,669.00 for the Application Period;

(6) Authorizing the Receiver to pay 80% of the allowed fees and 100% of the allowed costs from funds on hand in the receivership estate; and

(7) Granting such other and further relief as the Court deems just and appropriate.

DATED this 4th day of September 2024.

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

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Las Vegas, Nevada 89135

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

CERTIFICATE OF SERVICE

I hereby certify that, on the **4th day of September 2024**, a true and correct copy of the foregoing **TWELFTH APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND COSTS OF THE RECEIVER AND HIS PROFESSIONALS FOR THE PERIOD FROM APRIL 1, 2024, THROUGH JUNE 30, 2024** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP

LIST OF EXHIBITS

EXHIBIT	DESCRIPTION		
Exhibit 1	DECLARATION OF GEOFF WINKLER		
		EXHIBIT A	STANDARDIZED FUND ACCOUNTING REPORT
Exhibit 2	DECLARATION OF KARA B. HENDRICKS		
		EXHIBIT A	GREENBERG TRAURIG INVOICES
Exhibit 3	DECLARATION OF KYRA ANDRASSY		
		EXHIBIT A	RAINES FELDMAN LITTRELL LLP INVOICES
Exhibit 4	DECLARATION OF ERICKA BROWNE		
		EXHIBIT A	TCDI INVOICES
Exhibit 5	DECLARATION OF STACY CHIANG		
		EXHIBIT A	BAKER TILLY INVOICES
Exhibit 6	[PROPOSED] ORDER		

EXHIBIT 1

EXHIBIT 1

DECLARATION OF GEOFF WINKLER

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*Attorneys for Receiver,
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**DECLARATION OF GEOFF
WINKLER IN SUPPORT OF THE
TWELFTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM APRIL 1, 2024, THROUGH
JUNE 30, 2024**

I, Geoff Winkler, declare as follows:

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

2. I am competent to testify to the matters presented in this declaration, and I submit this declaration in support of my application for approval of the fees and costs of my firm and my

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

3. On August 6, 2021, on stipulation of the parties, the Court appointed me as the permanent receiver of Profit Connect Wealth Services, Inc. and any of its subsidiaries and affiliates (“Profit Connect”). This fee application covers the period from April 1, 2024, through June 30, 2024 (the “Application Period.”)

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

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

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

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

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

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

- Continued review and analysis of documents and materials retrieved for third party recovery evaluation and pursued claims against credit card companies;

- Preparation of documents to facilitate sale of real property;
- Continued to review documents and interview parties to determine potential litigation against third parties;
- Continued efforts on third party recovery with former employees who received funds or gifts from Profit Connect in excess of their W-2 wages;
- Continued efforts on third party recovery with agents who received bonuses or commissions for bringing investors into Profit Connect;
- Continued efforts with Levine Kellogg Lehman Schneider to investigate and pursue claims against financial institutions;
- Continued efforts with Texas litigation counsel to pursue actions against certain agents of Profit Connect; and
- Continued efforts to pursue legal malpractice claim.

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

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

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

13. All billing standards meet or exceed the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the U.S.

1 Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of
2 Expenses.

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

8 15. As of June 30, 2024, I was holding approximately \$10,251,502.76 in cash
9 belonging to Profit Connect. The total value of assets is estimated to be \$17,948,010, inclusive of
10 the abovementioned

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

12 Executed on September 4, 2024.

13 /s/ Geoff Winkler

14 GEOFF WINKLER

15 Receiver
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EXHIBIT A

EXHIBIT A

Standardized Fund Accounting Report

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 04/01/2024 to 06/30/2024

FUND ACCOUNTING (See instructions)				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 04/01/2024):	10,129,837.50		
	Increases in Fund Balance:			
Line 2	Business Income	-		
Line 3	Cash and Securities (in transit)	-		
Line 4	Interest/Dividend Income	31,753.77		
Line 5	Business Asset Liquidation	83,878.62		
Line 6	Personal Asset Liquidation	-		
Line 7	Third-Party Litigation Income	9,255.72		
Line 8	Miscellaneous - Other	-		
	Total Funds Available (Lines 1 - 8):		124,888.11	10,254,725.61
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	-		
Line 10b	Business Asset Expenses	(3,222.85)		
Line 10c	Personal Asset Expenses	-		
Line 10d	Investment Expenses	-		
Line 10e	Third-Party Litigation Expenses	-		
	1. Attorney Fees	-		
	2. Litigation Expenses	-		
	Total Disbursements for Receivership Operations		(3,222.85)	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments		-	
	Total Disbursements for Receivership Operations			(3,222.85)
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	-		
	Total Plan Development Expenses		-	
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	-		
	Total Plan Implementation Expenses		-	
	Total Disbursements for Distribution Expenses Paid by the Fund			-
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	-		
Line 12b	Federal Tax Payments	-		
	Total Disbursements to Court/Other:		-	
	Total Funds Disbursed (Lines 9 - 11):			(3,222.85)
Line 13	Ending Balance (As of 06/30/2024):			10,251,502.76
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		10,251,502.76	
Line 14b	Investments		-	
Line 14c	Other Assets or Uncleared Funds		7,613,170.50	
	Total Ending Balance of Fund - Net Assets			17,864,673.26

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 04/01/2024 to 06/30/2024

OTHER SUPPLEMENTAL INFORMATION:				
		Detail	Subtotal	Grand Total
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
<i>Line 15a</i>	<i>Plan Development Expenses Not Paid by the Fund</i>			
	1. Fees:			
	Fund Administrator	-		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Miscellaneous	-		
	Total Plan Development Expenses Not Paid by the Fund		-	
<i>Line 15b</i>	<i>Plan Implementation Expenses Not Paid by the Fund:</i>			
	1. Fees:			
	Fund Administrator	-		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Investor Identification:			
	Notice/Publishing Approved Plan	-		
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. FAIR Reporting Expenses	-		
	Total Plan Implementation Expenses Not Paid by the Fund		-	
<i>Line 15c</i>	<i>Tax Administrator Fees & Bonds Not Paid by the Fund</i>			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	Disbursements to Court/Other Not Paid by the Fund			
<i>Line 16a</i>	<i>Investment Expenses/CRIS Fees</i>		-	
<i>Line 16b</i>	<i>Federal Tax Payments</i>		-	
	Total Disbursements to Court/Other Not Paid by the Fund:			-
Line 17	DC & State Tax Payments			-
Line 18	No. of Claims:			
<i>Line 18a</i>	<i># of Claims Received This Reporting Period</i>	-		
<i>Line 18b</i>	<i># of Claims Received Since Inception of Fund</i>	485		
Line 19	No. of Claimants/Investors:			
<i>Line 19a</i>	<i># of Claimants/Investors Paid This Reporting Period</i>	-		
<i>Line 19b</i>	<i># of Claimants/Investors Paid Since Inception of Fund</i>	-		

Receiver: Geoff Winkler

By: Geoff Winkler
(printed name)Chief Executive Officer
American Fiduciary Services LLC
Receiver, Profit Connect Wealth Services, Inc.

Date: July 31, 2024

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
April 1, 2024 - June 30, 2024
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Geoff Winkler	Review and discuss demand, choice of law, responses from counsel.	4/1/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Anna Priebe	Team meeting regarding updates on claims motion.	4/1/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Email counsel KH and KA re: litigation section of status report.	4/1/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Meeting with GBW, JBH, JGR, MBB, PCC, RLD, JPM, JMA, and ORR regarding asset update and recovery.	4/1/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Meeting with JPM, GBW, and JBH re: claims motion.	4/1/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Discuss outstanding case issues with staff.	4/1/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM, JBH, JGR, MBB, PCC, RLD, AMP, JMA, and ORR regarding asset update and recovery.	4/1/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Meeting with AMP, JPM, and JBH re: claims motion.	4/1/2024	0.1	340.00	34.00	Legal - Case Administration
John Hall	Discuss outstanding case issues with staff.	4/1/2024	0.1	310.00	31.00	Legal - Case Administration
John Hall	Meeting with AMP, GBW, and JPM re: claims motion.	4/1/2024	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Meeting with AMP, GBW, and JBH re: claims motion.	4/1/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with GBW, JBH, JGR, MBB, PCC, RLD, AMP, JMA, and ORR regarding asset update and recovery.	4/1/2024	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Meeting with GBW, JBH, JGR, JPM, PCC, RLD, AMP, JMA, and ORR regarding asset update and recovery.	4/1/2024	0.1	255.00	25.50	Legal - Case Administration
Phil Chen	Reviewed and analyzed documents received.	4/1/2024	0.1	215.00	21.50	Legal - Case Administration
Josh McGraw	Email to JM re: additional information needed for deposition of JN.	4/2/2024	0.1	255.00	25.50	Financial - Litigation Consulting
Josh McGraw	Review of forensic account to respond to questions from JK for draft complaint and email response to requests.	4/3/2024	0.3	255.00	76.50	Financial - Litigation Consulting
Anna Priebe	Review and update pleadings on investor communication site.	4/3/2024	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM, KA and RP re: third party litigation.	4/3/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Communication with MC regarding complaint, tolling agreement, and cover letter.	4/3/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Communication with KA, JBH, and JPM regarding motion to employ RFL.	4/3/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Communication with KA and JPM regarding correspondence with claimants.	4/3/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Meeting with GBW, KA and RP re: third party litigation.	4/3/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with KA, JBH, and GBW regarding motion to employ RFL.	4/3/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication with KA and GBW regarding correspondence with claimants.	4/3/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Review of claims letter and email to KA re: types of claimants that should receive letter notice.	4/3/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Geoff Winkler	Review BoA draft complaint, research information needed for counsel, respond.	4/4/2024	0.6	340.00	204.00	Financial - Litigation Consulting
Josh McGraw	Email to MBB re: BT requested information for tax returns.	4/4/2024	0.1	255.00	25.50	Financial - Tax Issues
Milana Barkhanoy	Communication with SC and JPM re BT requested information for tax returns.	4/4/2024	0.2	255.00	51.00	Financial - Tax Issues
Geoff Winkler	Communication with JPM and TW regarding SL parcel.	4/4/2024	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with GBW and TW regarding SL parcel.	4/4/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to GBW re: summary of review.	4/4/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Reviewing purchase and sale agreement and confirming execution.	4/4/2024	0.6	255.00	153.00	Legal - Asset Disposition
Josh McGraw	Reviewing offer on Searchlight parcel and summarizing offer for GBW.	4/4/2024	0.5	255.00	127.50	Legal - Asset Disposition
Phil Chen	Analyzed documents received and mailed the documents to GBW.	4/4/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Email to counsel KA to discuss notice to claimants re claims allowance motion, review email from KA re motion and allowance for email notice.	4/4/2024	0.2	340.00	68.00	Legal - Claims Administration and Objections
Josh McGraw	Calls with claimant re: claims process.	4/4/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits.	4/5/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Discussion with JS re motion and hearing dates.	4/5/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Josh McGraw	Reviewing email from JM re: payment made.	4/5/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Review returned demand letters and researching online for new addresses.	4/5/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with KE and JS regarding DH action.	4/5/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Creating notice information for the claimants with claim adjustments.	4/5/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Calls with claimants re: questions about claims process and distribution estimates.	4/5/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Email notice information to KA.	4/5/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Emails with claimants re: change of address requests.	4/5/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Updating claimant contact information in KCC.	4/5/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections

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Summary of Fees of Receiver and Retained Personnel
April 1, 2024 - June 30, 2024
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
John Hall	Review CB offer and KEA memo re: same and discuss with GBW.	4/8/2024	0.4	310.00	124.00	Financial - Litigation Consulting
John Hall	Review draft demand from RLP and discuss with GBW.	4/8/2024	0.3	310.00	93.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with PCC re: recovery check.	4/8/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JM re: recovery check received.	4/8/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Anna Priebe	Meeting with GBW, JBH, MBB, PCC, RLD, JPM, JMA, SMB and JGR regarding case update and priorities.	4/8/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Meeting with KE and KH regarding case updates.	4/8/2024	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Communication with KA, JPM, KH, and JBH regarding CB proposed next steps.	4/8/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Review brief, communication with KH and KE regarding DH brief.	4/8/2024	0.2	340.00	68.00	Legal - Case Administration
John Hall	Discuss outstanding case issues with staff.	4/8/2024	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Meeting with GBW, JBH, MBB, PCC, RLD, AMP, JMA, SMB and JGR regarding case update and priorities.	4/8/2024	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Meeting with GBW, JBH, JGR, PCC, RLD, AMP, JMA, SMB and ORR regarding case update and priorities.	4/8/2024	0.1	255.00	25.50	Legal - Case Administration
Phil Chen	Reviewed a document received and forwarded it to GBW.	4/8/2024	0.1	215.00	21.50	Legal - Case Administration
Josh McGraw	Reviewing the first draft of the claims declaration, noting missing objections and comments. Reviewing second draft of the claims motion and providing notes to KA. Multiple emails with recommended changes to KA.	4/8/2024	2.1	255.00	535.50	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits.	4/9/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Josh McGraw	Review documents in relativity for JM request on JN matter.	4/9/2024	0.4	255.00	102.00	Financial - Litigation Consulting
Josh McGraw	Emails to KH and KA re: litigation counsel request for JN matter.	4/9/2024	0.2	255.00	51.00	Financial - Litigation Consulting
Geoff Winkler	Emails with counsel, third party re return of false profits.	4/9/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Review correspondence re promoter letter and proof of payments.	4/9/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JS re: meeting to discuss payment options.	4/9/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing response from TJ re: commissions received. Identifying supporting payment information and email to KH.	4/9/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Review motion and declaration, communication with KA and JPM regarding declaration ISO claim allowance motion.	4/9/2024	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Communication with DS and JPM regarding information in Relativity.	4/9/2024	0.1	340.00	34.00	Legal - Case Administration
John Hall	Review final declaration and motion from KEA and discuss claims process with GBW.	4/9/2024	0.4	310.00	124.00	Legal - Case Administration
Josh McGraw	Communication with KA and GBW regarding declaration ISO claim allowance motion.	4/9/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication with DS and GBW regarding information in Relativity.	4/9/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email communication with JM re: mediation requests.	4/9/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Emails with VA re: meeting to discuss documents in relativity.	4/9/2024	0.2	255.00	51.00	Legal - Case Administration
John Hall	Review potential effects of rising tide distribution versus standard pro rata, memo to GBW.	4/9/2024	1.0	310.00	310.00	Legal - Claims Administration and Objections
Josh McGraw	Email to claimant re: request for distribution process and notifications.	4/9/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Updating claimant's mailing address in KCC, attaching documentation and email response to confirm the new address on file.	4/9/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing final declaration and email to KA re: additional change prior to filing.	4/9/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits.	4/10/2024	0.1	340.00	34.00	Financial - Accounting/Auditing
Geoff Winkler	Review and respond to demand letter from counsel.	4/10/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Reviewing relativity for requested documentation for upcoming mediation and email to JM and RP.	4/10/2024	1.2	255.00	306.00	Financial - Litigation Consulting
Josh McGraw	Email to KH re: meeting with agent to discuss payment options.	4/10/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Emails with RP and JM re: agent list for AI request.	4/10/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Email to KH re: wiring instructions for repayment of funds.	4/10/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Anna Priebe	Editing report with asset information and review of section language.	4/10/2024	0.5	215.00	107.50	Legal - Case Administration
Geoff Winkler	Communication with RP, KA, KH and JPM regarding Allianz.	4/10/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Communication with KH and KA regarding claims motion.	4/10/2024	0.1	340.00	34.00	Legal - Case Administration
John Hall	Review Allianz demand and discuss with KEA and GBW.	4/10/2024	0.4	310.00	124.00	Legal - Case Administration
John Hall	Review investor count issue from RLP and discuss issue with GBW.	4/10/2024	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Modifying receivership website for new and future pleadings. Uploading new pleadings and noticing claimants.	4/10/2024	1.2	255.00	306.00	Legal - Case Administration

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
April 1, 2024 - June 30, 2024
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Anna Priebe	Communication with JPM re: motion finished and providing motion to investors, reviewing update to investors.	4/10/2024	0.3	215.00	64.50	Legal - Claims Administration and Objections
Josh McGraw	Reviewing claims motion created by KH and draft comments.	4/10/2024	0.8	255.00	204.00	Legal - Claims Administration and Objections
Josh McGraw	Communication with AMP re: motion finished and providing motion to investors, reviewing update to investors.	4/10/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Emails with claimants re: claims register and claimant numbers.	4/10/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Calls with claimants re: claims numbers and verifying claims. Estimates for interim distribution and distribution timeline.	4/10/2024	0.8	255.00	204.00	Legal - Claims Administration and Objections
Josh McGraw	Emails with KA re: noticing claimants for recommendation of claims.	4/10/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Communication with RLD re: motion finished and providing motion to investors, reviewing update to investors.	4/10/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Reviewing BK documents in relativity to determine structure.	4/11/2024	0.8	255.00	204.00	Financial - Data Analysis
Josh McGraw	Email to JM re: forensic accounting information for mediation.	4/11/2024	0.1	255.00	25.50	Financial - Litigation Consulting
Geoff Winkler	Call with JPM re: recovery efforts and payment options.	4/11/2024	0.3	340.00	102.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with EO re: recovery of agent commissions, payment options and promissory note (.4). Email follow-up to EO re: same (.1).	4/11/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with GBW re: recovery efforts and payment options.	4/11/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Email to SB re: batch uploads and structure of relativity.	4/11/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with VA to discuss the document set.	4/11/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to VA re: case discussion.	4/11/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Calls with claimants re: questions on claims motion, claims number, verifying claim and status.	4/11/2024	0.9	255.00	229.50	Legal - Claims Administration and Objections
Josh McGraw	Drafting letters to claimants with reserve status.	4/11/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Creating claims notices for claimants missing identification information.	4/11/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Geoff Winkler	Process wire deposits.	4/12/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Reconcile bank accounts.	4/12/2024	0.3	340.00	102.00	Financial - Accounting/Auditing
Geoff Winkler	Review materials in preparation for upcoming mediation.	4/12/2024	1.5	340.00	510.00	Financial - Litigation Consulting
Geoff Winkler	Emails with litigation counsel re upcoming mediation.	4/12/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Emails with KH re settlement with promotor.	4/12/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Communication with JM, and RP regarding disk in information and start time for mediation.	4/14/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Mediation with litigation counsel re claims against Allianz and JN.	4/15/2024	8.3	340.00	2,822.00	Financial - Litigation Consulting
Josh McGraw	Email to JS re: turnover of commissions received.	4/15/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Anna Priebe	Communication with JPM re: claims numbers.	4/15/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Meeting with JPM re: asset sections of report.	4/15/2024	0.2	215.00	43.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: claims numbers.	4/15/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMP re: asset sections of report.	4/15/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review order denying motion to dismiss.	4/16/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review demand letter, emails from counsel KA and MDC.	4/16/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review information on potential third party litigation target.	4/16/2024	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Review update to property sale, review FATCO documents.	4/16/2024	0.2	340.00	68.00	Legal - Asset Disposition
Anna Priebe	Email counsel KH and KA re: litigation section of report.	4/16/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Communication with KA regarding the hearing the claim allowance/disallowance motion.	4/16/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Review hearing notice, schedule with counsel.	4/16/2024	0.2	340.00	68.00	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits and accounts payable.	4/17/2024	0.3	340.00	102.00	Financial - Accounting/Auditing
Josh McGraw	Reviewing relativity to identify BK emails and text messages.	4/17/2024	0.5	255.00	127.50	Financial - Data Analysis
Anna Priebe	Meeting with JPM re: third party submission of supporting documents.	4/17/2024	0.2	215.00	43.00	Legal - Asset Analysis and Recovery
Anna Priebe	Downloaded and prepared third party submission of supporting documents.	4/17/2024	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with JS re: payment options and email follow-up with instructions.	4/17/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing recorder's office documents to confirm properties are unencumbered.	4/17/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing email correspondence with BOA and MDC.	4/17/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Meeting with AMP re: third party submission of supporting documents.	4/17/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JS re: meeting to discuss payment options.	4/17/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Creating stipulation for sale of Searchlight parcels.	4/17/2024	0.4	255.00	102.00	Legal - Asset Disposition
Josh McGraw	Email to KD re: title report and estimated settlement statement.	4/17/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Reviewing escrow agreement for Searchlight property.	4/17/2024	0.1	255.00	25.50	Legal - Asset Disposition
Anna Priebe	Drafting status report with KA feedback.	4/17/2024	0.3	215.00	64.50	Legal - Case Administration
Geoff Winkler	Meeting with JPM, KA, KH, AMP, JM and RP re: third party litigation, asset sales and claims.	4/17/2024	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Communication with JPM re: allowance and disallowance motion hearing.	4/17/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Communication with JPM regarding outstanding invoice.	4/17/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Email to AV and SK re: evidence structure in relativity.	4/17/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with GBW, KA, KH, AMP, JM and RP re: third party litigation, asset sales and claims.	4/17/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Updating counsel meeting notes to discuss assets, third party recovery and claims information.	4/17/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewing accounting to determine if deposition transcript invoice is outstanding and emails with JM re: same.	4/17/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewing order and emails re: allowance and disallowance motion hearing. Communication with GBW re: same.	4/17/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to GBW re: TS deposition invoice.	4/17/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to claimant re: information provided to GBW.	4/17/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Email to claimant re: request for claims number.	4/17/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Call with claimant re: status of their claim and timeline for distribution.	4/17/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits.	4/18/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Josh McGraw	Call with VA and email follow-up with analysis of documents and timeline for document transfer.	4/18/2024	0.3	255.00	76.50	Financial - Data Analysis
Josh McGraw	Emails with SB re: meeting to discuss imaged devices.	4/18/2024	0.2	255.00	51.00	Financial - Data Analysis
Sara Bond	Analyzed statements received and scanned to server.	4/18/2024	0.2	255.00	51.00	Financial - Data Analysis
Sara Bond	Received 4 property late notice fees from Clack Co Nevada. Scanned the notices to the server to the respective file and discussed with JPM what needed to take place to resolve the issues.	4/18/2024	0.3	255.00	76.50	Financial - Data Analysis
Geoff Winkler	Review draft stipulation for sale of real property.	4/18/2024	0.2	340.00	68.00	Legal - Asset Disposition
Geoff Winkler	Emails with counsel re third party payment.	4/18/2024	0.1	340.00	34.00	Legal - Asset Disposition
Josh McGraw	Reviewing email from RC re: title requests.	4/18/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Reviewing title report for Searchlight properties.	4/18/2024	0.7	255.00	178.50	Legal - Asset Disposition
Josh McGraw	Reviewing listing history and updating stipulation with prior offers. Creating exhibits for stipulation for legal description and purchase and sale agreement.	4/18/2024	0.5	255.00	127.50	Legal - Asset Disposition
Josh McGraw	Reviewing estimated settlement statement for Searchlight properties.	4/18/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Email to KH re: draft stipulation for Searchlight properties.	4/18/2024	0.1	255.00	25.50	Legal - Asset Disposition
Anna Priebe	Meeting with JBH re: business license notices.	4/18/2024	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Communication with JBH and KA regarding attendance for hearing.	4/18/2024	0.2	340.00	68.00	Legal - Case Administration
John Hall	Meeting with AMP re: business license notices.	4/18/2024	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Confirming third-party payments are allocated within KCC.	4/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication and call with SMB re: outstanding property taxes.	4/18/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to claimant re: confirming claimant number.	4/18/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Confirmation of wire received in KCC for AS and email response to SM.	4/19/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Review updated stipulation.	4/19/2024	0.1	340.00	34.00	Legal - Asset Disposition
Josh McGraw	Email to KH re: stipulation and approval from title still needed prior to filing.	4/19/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Email to RC re: draft stipulation for title approval.	4/19/2024	0.1	255.00	25.50	Legal - Asset Disposition
Anna Priebe	Communication with JPM re: business license.	4/19/2024	0.2	215.00	43.00	Legal - Case Administration
Anna Priebe	Finalizing first draft of report, emails with KH re: 2 pending sections.	4/19/2024	0.6	215.00	129.00	Legal - Case Administration
Geoff Winkler	Communication with BH regarding hold back and outstanding invoices.	4/19/2024	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Calls with VA re: BK documentation.	4/19/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Communication with AMP re: business license.	4/19/2024	0.2	255.00	51.00	Legal - Case Administration

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Summary of Fees of Receiver and Retained Personnel
April 1, 2024 - June 30, 2024
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Meeting with SB, SF and EB re: discussion of BK documents and search options for relative information.	4/19/2024	0.6	255.00	153.00	Legal - Case Administration
Geoff Winkler	Review opposition to MTD.	4/22/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review email from KH re offer of judgment, review offer.	4/22/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Resolving title issues, providing requested documentation for Searchlight parcels and emails with DJ.	4/22/2024	0.5	255.00	127.50	Legal - Asset Disposition
Josh McGraw	Email to KH re: stipulation approval from First American Title.	4/22/2024	0.1	255.00	25.50	Legal - Asset Disposition
Geoff Winkler	Prepare SFAR accounting for 1Q 2024.	4/23/2024	1.3	340.00	442.00	Financial - Accounting/Auditing
Geoff Winkler	Process deposits.	4/23/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Sara Bond	Reviewed and prepared SFAR with GBW.	4/23/2024	1.0	255.00	255.00	Financial - Accounting/Auditing
John Hall	Review investor ROI calculations to determine feasibility of rising tide payout.	4/23/2024	0.4	310.00	124.00	Financial - Data Analysis
Sara Bond	Completion and e-filing of BOI form to FinCEN.	4/23/2024	0.3	255.00	76.50	Financial - Tax Issues
John Hall	Review and discuss CB resolution figures from KEA with GBW.	4/23/2024	0.3	310.00	93.00	Legal - Asset Analysis and Recovery
Josh McGraw	Call with BF re: repayment of commissions received and email with hardship claim information.	4/23/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Anna Priebe	Status report work.	4/23/2024	0.9	215.00	193.50	Legal - Case Administration
Anna Priebe	Communication with JPM re: employee settlements.	4/23/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Communication with KA regarding CB offer approval.	4/23/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Communication with KH, KA, and JS regarding drafted opposition.	4/23/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: employee settlements.	4/23/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Communication with JPM re: claims register and total claims.	4/23/2024	0.2	340.00	68.00	Legal - Claims Administration and Objections
Josh McGraw	Call with two claimants re: the distribution timeline and claims status.	4/23/2024	0.6	255.00	153.00	Legal - Claims Administration and Objections
Josh McGraw	Communication with GBW re: claims register and total claims.	4/23/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Email to claimant re: claim number.	4/23/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Review of search results from SB for requested documents. Email follow up with questions regarding document structure.	4/24/2024	0.6	255.00	153.00	Financial - Data Analysis
Geoff Winkler	Review updated draft of MTD and respond to counsel.	4/24/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review proposed declaration in DH action, discuss with counsel, review proposed changes from KH and KA, emails with counsel.	4/24/2024	0.4	340.00	136.00	Financial - Litigation Consulting
Geoff Winkler	Review suggested edits to draft declaration, discuss with counsel.	4/24/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review proposed draft MTD updates, emails with JS.	4/24/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Reviewing draft opposition to DH matter and redlining comments. Email to GBW with summary.	4/24/2024	0.9	255.00	229.50	Financial - Litigation Consulting
John Hall	Review and approve draft FinCEN submission from SMB.	4/24/2024	0.2	310.00	62.00	Financial - Tax Issues
Josh McGraw	Call with BF re: hardship application.	4/24/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Confirming payment status of JM repayment plan. Email to JM re: identification of prior payments and reminding the instructions to be used on a go forward basis.	4/24/2024	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
Anna Priebe	Communication with JPM re: SFAR and investor communication.	4/24/2024	0.2	215.00	43.00	Legal - Case Administration
Anna Priebe	Report work, including finishing first drafting of report language, preparing exhibits and reviewing SFAR numbers.	4/24/2024	2.9	215.00	623.50	Legal - Case Administration
Geoff Winkler	Communication with JS and JPM regarding opposition draft.	4/24/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Review declarations and pull data, communication with KE and KH regarding drafted declaration.	4/24/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: SFAR and investor communication.	4/24/2024	0.2	255.00	51.00	Legal - Case Administration
Renee Dieffenderfer	Communication with AMP and review of drafted status report.	4/24/2024	0.7	255.00	178.50	Legal - Case Administration
Josh McGraw	Responding to claimant emails and updating mailing addresses per claimant requests.	4/24/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Calls with two claimants re: status of claims, distribution process and contact information.	4/24/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Updating claimants mailing addresses in KCC per claimants.	4/24/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Emails with claimants re: questions on claims process or court filings.	4/24/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Geoff Winkler	Review and edit draft report and exhibits.	4/25/2024	0.4	340.00	136.00	Financial - Status Reports
Josh McGraw	Reviewing status report and updating language in asset section.	4/25/2024	0.6	255.00	153.00	Financial - Status Reports
Josh McGraw	Communication with AMP re: SFAR.	4/25/2024	0.1	255.00	25.50	Financial - Status Reports
Geoff Winkler	Emails with counsel KH re third party payment plan.	4/25/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Call with EO re: recovery efforts. Email with transactions and payment plan information.	4/25/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Anna Priebe	Reviewing changes and feedback made for final draft.	4/25/2024	1.1	215.00	236.50	Legal - Case Administration
Anna Priebe	Email JPM re: report draft.	4/25/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Review changes from JPM and email report to GBW.	4/25/2024	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Communication with JS regarding final opposition to be filed.	4/25/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Email to GBW re: deposition invoice.	4/25/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Calls with claimants re: interim distribution motion and timeline. Confirming claims numbers.	4/25/2024	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Reviewing invoices for deposition and email to GBW to remit payment.	4/25/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with AMP re: claimant emails.	4/25/2024	0.1	255.00	25.50	Legal - Case Administration
John Hall	Update rising tide model spreadsheet. Discuss limited impact with GBW.	4/25/2024	0.5	310.00	155.00	Legal - Claims Administration and Objections
Geoff Winkler	Process accounts payable.	4/26/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Josh McGraw	Reviewing document search compilation from SM and email summary to VA.	4/26/2024	0.6	255.00	153.00	Financial - Data Analysis
Josh McGraw	Call with VA re: discussing data and structure of document transfer.	4/26/2024	0.3	255.00	76.50	Financial - Data Analysis
Josh McGraw	Emails with SM re: BK documents.	4/26/2024	0.2	255.00	51.00	Financial - Data Analysis
Josh McGraw	Call with SM re: data options, timeline, requirements and cost.	4/26/2024	0.4	255.00	102.00	Financial - Data Analysis
Geoff Winkler	Emails with counsel JS re declaration for MSJ.	4/26/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Josh McGraw	Reviewing outstanding promoter recovery and determining next steps.	4/26/2024	0.6	255.00	153.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing hardship claim for SS.	4/26/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Anna Priebe	Email counsel KA and KH re: draft report for review.	4/26/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Finalizing report based on GBW feedback, prepared exhibits.	4/26/2024	0.4	215.00	86.00	Legal - Case Administration
Geoff Winkler	Communication with RP regarding scheduling of deposition.	4/26/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Communication with KH regarding discussion with DP.	4/26/2024	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Calls with claimants re: address change and claim number.	4/26/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Verifying claimant information and email responding to claimant.	4/26/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Geoff Winkler	Emails with counsel re deposition date.	4/29/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Communication with RP regarding scheduling of proposed deposition, schedule required details.	4/29/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Josh McGraw	Calls with EO re: payment plan options and hardship application. Email follow-up re: same.	4/29/2024	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
Josh McGraw	Follow-up email to JS re: payment.	4/29/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Anna Priebe	Email counsel KA and KH re: follow up on review of report.	4/29/2024	0.1	215.00	21.50	Legal - Case Administration
John Hall	Review deposition issues and logistics with GBW.	4/29/2024	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Email to GBW re: EG and JC information.	4/29/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing voicemails prior to contacting claimants.	4/29/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Meeting with MBB re: distribution plan calculations.	4/29/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Emails with claimants re: distribution timeline and confirming mailing addresses.	4/29/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Milana Barkhanoy	Meeting with JPM re: distribution plan calculations.	4/29/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Anna Priebe	Call with JPM re: finalizing status report.	4/30/2024	0.1	215.00	21.50	Financial - Status Reports
Josh McGraw	Call with AMP re: finalizing status report.	4/30/2024	0.1	255.00	25.50	Financial - Status Reports
Josh McGraw	Reviewing KH and KA changes for the status report.	4/30/2024	0.1	255.00	25.50	Financial - Status Reports
Josh McGraw	Reviewing KH changes for the status report.	4/30/2024	0.1	255.00	25.50	Financial - Status Reports
Josh McGraw	Emails with JS re: payment.	4/30/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Anna Priebe	Review counsel edits to report and communication with GBW re: same.	4/30/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Communication with JM and RP regarding prep for deposition.	4/30/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Correcting AR for JM as previously associated with MJJ.	5/1/2024	0.2	255.00	51.00	Financial - Accounting/Auditing
Josh McGraw	Researching addresses for returned recovery letters.	5/1/2024	0.3	255.00	76.50	Financial - Data Analysis
Josh McGraw	Updating recovery efforts in KCC.	5/1/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Call with JM re: unsecured promissory note and payments received.	5/1/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Updating payment schedule for JM payments received. Changing unsecured promissory note and payment schedule. Email to JM re: same.	5/1/2024	0.6	255.00	153.00	Legal - Asset Analysis and Recovery
John Hall	Call with JPM, AMP, KH, KA to discuss ongoing third party and distribution plan matters.	5/1/2024	0.4	310.00	124.00	Legal - Case Administration
Josh McGraw	Updating trackers for counsel meeting.	5/1/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with JBH, AMP, KH, KA to discuss ongoing third party and distribution plan matters.	5/1/2024	0.4	255.00	102.00	Legal - Case Administration

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Josh McGraw	Email to claimant re: claims motion.	5/1/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Emails with KA re: tardy claims and reviewing motion to provide claimant guidance.	5/1/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Josh McGraw	Calls with claimant re: tardy claim and upcoming hearing.	5/1/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
John Hall	Review monthly BOA account statements.	5/2/2024	0.2	310.00	62.00	Financial - Corporate Finance
Josh McGraw	Verifying registered claimant email address to determine issues with receiving notices.	5/2/2024	0.2	255.00	51.00	Financial - Data Analysis
Geoff Winkler	Review MSJ from Allianz, MSJ from Nicholas.	5/2/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Geoff Winkler	Review defendants reply to our response to MTD.	5/2/2024	0.2	340.00	68.00	Financial - Litigation Consulting
John Hall	Review filed MSJ's sent from RLP.	5/2/2024	0.4	310.00	124.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing TM response to DH matter.	5/2/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Email to KA re: BofA matter.	5/2/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: invoice received for JN matter.	5/2/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Review MDC response on litigation update. Email to KA re: same.	5/2/2024	0.2	255.00	51.00	Legal - Case Administration
Anna Priebe	Call with JPM re: potential disallow of claims.	5/2/2024	0.2	215.00	43.00	Legal - Claims Administration and Objections
Josh McGraw	Call with AMP re: potential disallow of claims.	5/2/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Josh McGraw	Call with claimant re: claims hearing and distribution timeline. Email after call with additional information.	5/2/2024	0.4	255.00	102.00	Legal - Claims Administration and Objections
Geoff Winkler	Email with JS and JPM regarding reply to MTD for DH, review motion and provide comments to counsel.	5/3/2024	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Review update re sale of Searchlight parcel.	5/6/2024	0.1	340.00	34.00	Legal - Asset Disposition
Josh McGraw	Email to KH re: Searchlight stipulation.	5/6/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Meeting with RLD regarding searchlight and claims process update.	5/6/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Uploading new pleadings to website and noticing investors and creditors.	5/6/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Email to KA re: receivership update.	5/6/2024	0.1	255.00	25.50	Legal - Case Administration
Renee Dieffenderfer	Meeting with JPM regarding searchlight and claims process update.	5/6/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: claims hearing.	5/6/2024	0.1	340.00	34.00	Legal - Claims Administration and Objections
Josh McGraw	Call with GBW re: claims hearing.	5/6/2024	0.1	255.00	25.50	Legal - Claims Administration and Objections
Josh McGraw	Call with claimant re: questions on pleadings.	5/6/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Geoff Winkler	Email with JPM regarding signed SL order.	5/7/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to KE re: order received for Searchlight parcel sale.	5/7/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Email to GBW re: setting up closing for Searchlight parcel sale.	5/7/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Emails with TW re: closing timeline request from Buyer and confirming outstanding closing items.	5/7/2024	0.2	255.00	51.00	Legal - Asset Disposition
Josh McGraw	Email to RC re: court approval of Searchlight disposition.	5/7/2024	0.1	255.00	25.50	Legal - Asset Disposition
Josh McGraw	Email to KD and RC re: closing documents and confirming deadline.	5/7/2024	0.1	255.00	25.50	Legal - Asset Disposition
Geoff Winkler	Email communication with KA and KH regarding hearing.	5/7/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Process deposits.	5/8/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Sara Bond	Received parcels and determined there was information to sort through based on senders.	5/8/2024	0.1	255.00	25.50	Financial - Data Analysis
Josh McGraw	Reviewing order from judge denying dismissal of claim and email to JS.	5/8/2024	0.3	255.00	76.50	Financial - Litigation Consulting
Josh McGraw	Email to SMB re: reports needed for SC and EC and email to SC and EC re: finalizing case and number of tax returns to complete.	5/8/2024	0.2	255.00	51.00	Financial - Tax Issues
Josh McGraw	Email to JS re: claw back check received.	5/8/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Meeting with RP, JMF, JM, KA, KH, and GBW regarding mediators' proposal.	5/8/2024	0.6	255.00	153.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Provide identification verification in advance of property closing.	5/8/2024	0.3	340.00	102.00	Legal - Asset Disposition
Geoff Winkler	Review closing and settlement statement for Searchlight.	5/8/2024	0.2	340.00	68.00	Legal - Asset Disposition
Geoff Winkler	Call with JPM re: Searchlight closing.	5/8/2024	0.2	340.00	68.00	Legal - Asset Disposition
Josh McGraw	Call with KD re: Searchlight closing.	5/8/2024	0.3	255.00	76.50	Legal - Asset Disposition
Josh McGraw	Emails with KD and RC re: closing for Searchlight parcel, setting up notary, requested changes to documents and finalizing settlement statement.	5/8/2024	0.4	255.00	102.00	Legal - Asset Disposition
Josh McGraw	Call with GBW re: Searchlight closing.	5/8/2024	0.2	255.00	51.00	Legal - Asset Disposition
Josh McGraw	Reviewing closing documents for Searchlight parcel sale and confirming the disclosures and documents are in alignment with prior sales.	5/8/2024	1.2	255.00	306.00	Legal - Asset Disposition
Josh McGraw	Confirming settlement statement is in agreement with purchase and sale agreement and listing agreement.	5/8/2024	0.3	255.00	76.50	Legal - Asset Disposition

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Anna Priebe	Review of RTS investor documents from SMB.	5/8/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Email and communication with JPM re: RTS investor notices.	5/8/2024	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Emails with counsel KA re remote attendance at hearing for JPM.	5/8/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Email with JS, KH, KA, JBH, and JPM regarding motion to dismiss being denied.	5/8/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Meeting with RP, JMF, JM, KA, KH, and JPM regarding mediators' proposal.	5/8/2024	0.6	340.00	204.00	Legal - Case Administration
Josh McGraw	Email to SR re: hearing information.	5/8/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KA re: hearing information received.	5/8/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW re: claims motion hearing.	5/8/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email and communication with AMP re: RTS investor notices.	5/8/2024	0.2	255.00	51.00	Legal - Case Administration
Milana Barkhanoy	Emails with SC and JPM re cash receipts and disbursement requests.	5/8/2024	0.2	255.00	51.00	Legal - Case Administration
Sara Bond	Email request from EC at BT for items needed in order to move forward on 2023 taxes, statements compiled from KCC and sent.	5/9/2024	0.6	255.00	153.00	Financial - Accounting/Auditing
Geoff Winkler	Review tolling agreement with proposed changes, comments to litigation counsel.	5/9/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Geoff Winkler	Call with RP, JM, KH and JPM re: AI settlement discussions.	5/9/2024	0.4	340.00	136.00	Financial - Litigation Consulting
Josh McGraw	Call with RP, JM, KH and GBW re: AI settlement discussions.	5/9/2024	0.4	255.00	102.00	Financial - Litigation Consulting
Josh McGraw	Communication with SMB re: closing documents and EC questions.	5/9/2024	0.1	255.00	25.50	Financial - Tax Issues
Josh McGraw	Communication with SMB re: closing documents and EC questions.	5/9/2024	0.1	255.00	25.50	Financial - Tax Issues
Josh McGraw	Responding to EC questions on recovery and gathering supporting documents.	5/9/2024	0.8	255.00	204.00	Financial - Tax Issues
Sara Bond	Communication with JPM re: closing documents and EC questions.	5/9/2024	0.1	255.00	25.50	Financial - Tax Issues
Geoff Winkler	Review email from counsel KA re settlement with CB.	5/9/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing documents for closing of searchlight property and emails with KD.	5/9/2024	0.3	255.00	76.50	Legal - Asset Disposition
Geoff Winkler	Call to close SL properties.	5/9/2024	0.8	340.00	272.00	Legal - Case Administration
Josh McGraw	Email to KD re: final settlement statements.	5/9/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Creating narrative for KA per request.	5/9/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Reviewing communication from MDC re: tolling agreement.	5/9/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing communication from JM re: AI settlement agreement discussion.	5/9/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Finalizing responses to EC and email to SMB with closing documents.	5/10/2024	0.3	255.00	76.50	Financial - Tax Issues
Geoff Winkler	Review email from title re property sale recorded.	5/10/2024	0.1	340.00	34.00	Legal - Asset Disposition
Geoff Winkler	Email with KA regarding CB tolling agreement, execute agreement and return to counsel.	5/10/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Email to KD re: closing statements.	5/10/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to SB re: estimates for data transfer.	5/10/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to VA re: documents and call re: discussing options for document transfer.	5/10/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to SB re: native file transfer.	5/10/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails with claimants re: questions on distribution timeline and status of litigation efforts.	5/10/2024	0.2	255.00	51.00	Legal - Claims Administration and Objections
Geoff Winkler	Reconcile bank accounts.	5/10/2024	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Update quarterly accounting.	5/13/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Process wire deposits.	5/13/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Sara Bond	Email with SC and EC from BT for a status update.	5/13/2024	0.1	255.00	25.50	Financial - Accounting/Auditing
Geoff Winkler	Call with BT to discuss tax returns, progress, changes.	5/13/2024	0.2	340.00	68.00	Financial - Tax Issues
Josh McGraw	Email to GBW re: wire confirmation for Searchlight sale and allocating to final parcels in KCC.	5/13/2024	0.3	255.00	76.50	Legal - Asset Disposition
Josh McGraw	Reviewing recorded documents provided by TW and email response.	5/13/2024	0.2	255.00	51.00	Legal - Asset Disposition
Anna Priebe	Meeting with JPM re: hearing preparation.	5/13/2024	0.4	215.00	86.00	Legal - Case Administration
Anna Priebe	Prepare preliminary outline for second quarter status report.	5/13/2024	0.4	215.00	86.00	Legal - Case Administration
Anna Priebe	Discussion with JPM re: supporting documents for disallowed claims.	5/13/2024	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Claims hearing.	5/13/2024	2.0	340.00	680.00	Legal - Case Administration
Josh McGraw	Email to GBW re: interim distribution.	5/13/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMP re: hearing preparation.	5/13/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Uploading latest pleadings to website for investors to reference.	5/13/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Discussion with AMP re: supporting documents for disallowed claims.	5/13/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review updated proposed order.	5/13/2024	0.1	340.00	34.00	Legal - Claims Administration and Objections
Geoff Winkler	Prepare for claims hearing including review of pleadings and previous reports.	5/13/2024	0.5	340.00	170.00	Legal - Claims Administration and Objections

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Summary of Fees of Receiver and Retained Personnel
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(Sorted in Chronological Order by Activity Category)

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Geoff Winkler	Communication with JPM re: supporting documents for claims hearing.	5/13/2024	0.1	340.00	34.00	Legal - Claims Administration and Objections
Josh McGraw	Communication with GBW re: supporting documents for claims hearing (.1), emails with supporting documents (.2) and creating supporting documents (.2).	5/13/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
Josh McGraw	Preparing for claims hearing (.4) and attending claims hearing via teleconference (.3).	5/13/2024	0.7	255.00	178.50	Legal - Claims Administration and Objections
Josh McGraw	Emails with KA re: support of claims disallowance (.2) and working within KCC to determine extraction process (.3)	5/13/2024	0.5	255.00	127.50	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits.	5/14/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Josh McGraw	Email to SC and EC re: outstanding tax liabilities estimate.	5/14/2024	0.1	255.00	25.50	Financial - Tax Issues
Geoff Winkler	Email with AFS team regarding order allowing and disallowing claims.	5/14/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM re: interim distribution motion and relativity requests.	5/14/2024	0.5	340.00	170.00	Legal - Case Administration
Josh McGraw	Updating the website with order approving claims motion and hearing minutes. Email notification to registered parties.	5/14/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Emails with claimants re: questions on claims numbers, status of claims and distribution timeline.	5/14/2024	0.7	255.00	178.50	Legal - Case Administration
Josh McGraw	Call with claimant re: tardy claim.	5/14/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with GBW re: interim distribution motion and relativity requests.	5/14/2024	0.5	255.00	127.50	Legal - Case Administration
Geoff Winkler	Review claims order, review updates needed.	5/14/2024	0.3	340.00	102.00	Legal - Claims Administration and Objections
Josh McGraw	Call with claimant re: hearing on claims motion, distribution timeline and status of claim.	5/14/2024	0.3	255.00	76.50	Legal - Claims Administration and Objections
Geoff Winkler	Review draft settlement agreement, emails with counsel.	5/15/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review potential experts for DH litigation, email with counsel.	5/15/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Anna Priebe	Communication with RLD and JPM regarding investor communication.	5/15/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Meeting with JM, RP, KA, KH, JPM and AMP re: litigation updates, interim distribution motion and recovery efforts.	5/15/2024	0.5	340.00	170.00	Legal - Case Administration
Josh McGraw	Emails with claimants re: questions about claims order, claimant numbers, and estimation for distribution timeline.	5/15/2024	1.5	255.00	382.50	Legal - Case Administration
Josh McGraw	Meeting with JM, RP, KA, KH, GBW and AMP re: litigation updates, interim distribution motion and recovery efforts.	5/15/2024	0.5	255.00	127.50	Legal - Case Administration
Renee Dieffenderfer	Communication with AMP and JPM regarding investor communication.	5/15/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KA re: claimant requesting confirmation of claims.	5/16/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to claimants re: claims order and interim distribution motion.	5/16/2024	0.3	255.00	76.50	Legal - Case Administration
Sara Bond	Receiving and evaluating payment received.	5/16/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Process deposits.	5/17/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Call from Cox collection agency, email to JPM.	5/17/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Email with JPM regarding request to contact from MB.	5/17/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Email to GBW re: creditor email received for CI.	5/17/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call to MBW re: discussion of claims process and notice for claims.	5/17/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with claimant re: recovery process, estimates for distributions and timeline and estimates to close out case.	5/17/2024	0.7	255.00	178.50	Legal - Case Administration
Geoff Winkler	Email from counsel JS re disclosures, review three disclosure documents, prepare responses.	5/20/2024	0.5	340.00	170.00	Financial - Litigation Consulting
Josh McGraw	Reviewing brief in response to JN MSJ provided by RP.	5/20/2024	0.4	255.00	102.00	Legal - Asset Analysis and Recovery
Anna Priebe	Discussion with JPM re: tardy claim forms and creditor appeals.	5/20/2024	0.3	215.00	64.50	Legal - Case Administration
Geoff Winkler	Meeting with JPM re: individuals reaching out claims.	5/20/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Reviewing information from WH re: agents.	5/20/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Discussion with AMP re: tardy claim forms and creditor appeals.	5/20/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to JGR re: claimant requesting a call.	5/20/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Calls with claimants re: questions about claims process and interim distribution process.	5/20/2024	0.9	255.00	229.50	Legal - Case Administration
Josh McGraw	Email to claimants re: questions about their claims number, interim distribution timeline and recovery efforts.	5/20/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Updating contact information for claimants per their request.	5/20/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with GBW re: individuals reaching out claims.	5/20/2024	0.2	255.00	51.00	Legal - Case Administration
Grace Radke	Call from investor returning JPM call.	5/20/2024	0.1	225.00	22.50	Legal - Claims Administration and Objections
Geoff Winkler	Review proposed changes to tolling agreement, question from BoA counsel, discussion with litigation counsel.	5/21/2024	0.2	340.00	68.00	Financial - Litigation Consulting

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Anna Priebe	Communication with GBW and planning re: next investor call.	5/21/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Communication with AMP and planning re: next investor call.	5/21/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Emails with claimants re: update on distribution timeline and update address request.	5/21/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Updating payment addresses for three claimants and uploading request emails in KCC for support.	5/21/2024	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Emails with counsel KA re subordination of certain claims, review claims and respond.	5/21/2024	0.2	340.00	68.00	Legal - Claims Administration and Objections
John Hall	Review claims inquiry from KEA, review case file and respond re: same.	5/21/2024	0.4	310.00	124.00	Legal - Claims Administration and Objections
Geoff Winkler	Review brief in support of MSJ response.	5/22/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review proposed changes to Allianz settlement, email with counsel KH.	5/22/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Grace Radke	Call with claimant regarding distribution amount.	5/22/2024	0.2	225.00	45.00	Legal - Claims Administration and Objections
Geoff Winkler	Emails with counsel JM re revisions to draft settlement agreement.	5/23/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review further comments from litigation counsel, KH, KA, discuss.	5/23/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review final tolling agreement and execute for counsel.	5/23/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Email to GBW re: discussion of JS requests.	5/23/2024	0.1	255.00	25.50	Financial - Litigation Consulting
Josh McGraw	Adding CB settlement amount to KCC assets.	5/23/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Email from JS re disclosures.	5/23/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Email with KH, KA, JK, and JPM regarding finalization of agreement.	5/23/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Email with KA, JBH, JPM, and KH regarding settlement with CB.	5/23/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Updating claims in KCC based approval on order for allowance and disallowance of claims.	5/23/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Responding to claimants' questions re: recovery efforts, approved claims and claimant information.	5/23/2024	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Emails with counsel re strategy for promoter recovery.	5/24/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JS re: disclosures.	5/28/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Email to JS re: facts of DH claim.	5/28/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Anna Priebe	Email CR re: investor meeting set up.	5/28/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Email with KE regarding contact from Cox.	5/28/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: JS request.	5/28/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Reviewing information provided by claimant and email to GBW.	5/28/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with VA re: documents.	5/28/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with GBW re: JS request.	5/28/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing claims notices for investor contact information (.2) and email re: tardy claim (.1).	5/28/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Updating holdback information to interim distribution motion and reviewing prior fee app to create estimates.	5/28/2024	0.4	255.00	102.00	Legal - Case Administration
Geoff Winkler	Review motion for leave to reply.	5/29/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review final settlement agreement, execute and return to counsel.	5/29/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Meeting with JPM to discuss disclosures, work responsibilities.	5/29/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Josh McGraw	Meeting with GBW to discuss disclosures, work responsibilities.	5/29/2024	0.3	255.00	76.50	Financial - Litigation Consulting
Josh McGraw	Reviewing outstanding assets and determining possible recovery amounts.	5/29/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Review letter from creditor, emails with counsel KE to discuss options.	5/29/2024	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Discussion with interested party DS re ACP.	5/29/2024	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Review information regarding promoter activity.	5/29/2024	0.1	340.00	34.00	Legal - Case Administration
John Hall	Meeting with JPM re: interim distribution.	5/29/2024	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Email to GBW and KH re: agent discussion.	5/29/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing final settlement statement received from FATCO.	5/29/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to SMB re: final settlement statement for taxes.	5/29/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to claimant re: information provided on agent.	5/29/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with claimant re: estimates for payments and timeline for distribution.	5/29/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Meeting with JBH re: interim distribution.	5/29/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with KH, KA, RP re: litigation update, interim distribution motion and recovery efforts.	5/29/2024	0.4	255.00	102.00	Legal - Case Administration
Geoff Winkler	Process deposits.	5/30/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Communication with JPM re: agent recovery.	5/30/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery

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Geoff Winkler	Meeting with JPM and KH re: discussion of agent commission recoveries.	5/30/2024	0.5	340.00	170.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing claimant correspondence and confirming email registered on the website. Email to claimant confirming email address receiving emails and process to keep emails in inbox.	5/30/2024	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Email to GBW re: agent outstanding recovery.	5/30/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with GBW re: agent recovery.	5/30/2024	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Meeting with GBW and KH re: discussion of agent commission recoveries.	5/30/2024	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with JPM re: interim distribution motion.	5/30/2024	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Call with GBW re: interim distribution motion.	5/30/2024	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Execute updated settlement document, email to counsel.	5/31/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Anna Priebe	Email CR re: investor meeting.	5/31/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Updating investor communication site with meeting information and questions form, creating and sending mass email to notice investors.	5/31/2024	0.4	215.00	86.00	Legal - Case Administration
Anna Priebe	Communication with JPM regarding investor meeting and communication.	5/31/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Email with JM, JH, JA, JM, RP, KA, and JPM regarding Allianz Settlement Agreement.	5/31/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Communication with AMP regarding investor meeting and communication.	5/31/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication with AMP re: emails to investors.	5/31/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing returned checks provided by SMB.	6/3/2024	0.1	255.00	25.50	Financial - Data Analysis
Geoff Winkler	Emails with litigation counsel MDC re clawback claims, emails with counsel KA to discuss logistics and plan moving forward.	6/3/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Emails with BH re invoices and payment timing.	6/3/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM re: interim distribution estimates.	6/3/2024	0.3	340.00	102.00	Legal - Case Administration
John Hall	Review and discuss demand letters with KEA and GBW.	6/3/2024	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Call with VA re: relativity.	6/3/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with GBW re: interim distribution estimates.	6/3/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Calls and communication with JS re: DH matter.	6/4/2024	0.3	255.00	76.50	Financial - Litigation Consulting
Josh McGraw	Reviewing claims notices, email correspondence and email to claimant re: procedures, motion and bar date.	6/4/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to SB re: access for VA to relativity.	6/4/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing documents provided by a claimant. Determining notice timeline for a claimant, confirming claim filing status, and providing pleadings. Email to claimant re: tardy claim.	6/4/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Updating interim distribution estimates and confirming cost for TCDI.	6/4/2024	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Review email from counsel KH re JS requesting co-counsel, review CV of potential co-counsel.	6/5/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Email to SC re: tax liability estimate.	6/5/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review email from JS re insurance coverage, email to KH to discuss, email to JS re additional insurance coverage, offer of judgement.	6/6/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Emails with KH re NSB BC funds.	6/6/2024	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Review estimated holdback for interim distribution.	6/6/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Updating estimated holdback information based on information provided by BT and finalizing AFS estimates (.5). Email to GBW for review (.1).	6/6/2024	0.6	255.00	153.00	Legal - Case Administration
Anna Priebe	Preparing questions and agenda for meeting.	6/7/2024	1.4	215.00	301.00	Legal - Case Administration
Anna Priebe	Email KH re: draft of meeting agenda.	6/7/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Review draft investor meeting agenda.	6/7/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Reconcile bank accounts.	6/10/2024	0.2	340.00	68.00	Financial - Accounting/Auditing
Josh McGraw	Reviewing checks received from JM and JM.	6/10/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Anna Priebe	Email KH re: draft of meeting agenda.	6/10/2024	0.1	215.00	21.50	Legal - Case Administration
Anna Priebe	Preparation and mass email to investors reminding them of upcoming meeting.	6/10/2024	0.2	215.00	43.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM, KH and KE re: JS request for adding co-counsel.	6/10/2024	0.5	340.00	170.00	Legal - Case Administration
Josh McGraw	Meeting with GBW, KH and KE re: JS request for adding co-counsel.	6/10/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Reviewing meeting agenda and questions from claimants.	6/10/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to JS re: meeting to discuss facts.	6/10/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review update from counsel MDC.	6/11/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Josh McGraw	Call with JS re: document request and discussion of relativity.	6/11/2024	0.4	255.00	102.00	Financial - Litigation Consulting

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April 1, 2024 - June 30, 2024
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Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Email with JS re: meeting to discuss items for pleadings.	6/11/2024	0.1	255.00	25.50	Financial - Litigation Consulting
John Hall	Review tolling agreement and discuss with GBW, analysis of case file.	6/11/2024	0.4	310.00	124.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing recovery of DP and email to SM re: status of recovery.	6/11/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Josh McGraw	Communication with GBW re: JC Commercial closing update.	6/11/2024	0.1	255.00	25.50	Legal - Asset Disposition
Anna Priebe	Running investor meeting including monitoring and responding to chat questions.	6/11/2024	0.3	215.00	64.50	Legal - Case Administration
Anna Priebe	Email litigation counsel re: public statement for investor meeting.	6/11/2024	0.2	215.00	43.00	Legal - Case Administration
Anna Priebe	Email IT to finish recording of investor meeting.	6/11/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Communication with JPM re: interim distribution estimates.	6/11/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Prepare for investor call.	6/11/2024	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Investor meeting.	6/11/2024	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Communication with GBW re: interim distribution estimates.	6/11/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor meeting with GBW.	6/11/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Calls with claimants re: distribution timeline and recovery efforts.	6/11/2024	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Reviewing claims and gathering information interim distribution motion.	6/11/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Reviewing voicemail from SB re: documents to provide to VA.	6/11/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Email to counsel re previous motion for settlement.	6/12/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review counterclaim filed by DH, review counsel KH and KE analysis and next steps.	6/12/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Anna Priebe	Meeting with JPM re: operations updates.	6/12/2024	0.1	215.00	21.50	Legal - Case Administration
Josh McGraw	Email to GBW re: motion for claims bar.	6/12/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with AMP re: operations updates.	6/12/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with KA, AMP, JM, and RP re: litigation updates and interim distribution motion.	6/12/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Emails to claimants re: recorded investor call.	6/12/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review research on bar orders, discuss with counsel.	6/13/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review email from KE re DH counterclaim, best response.	6/13/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Josh McGraw	Reviewing information provided by JdC re: bar order and email to KH.	6/13/2024	0.2	255.00	51.00	Financial - Litigation Consulting
Anna Priebe	Review and upload recording of investor meeting to sites (.4) and mass notice email to investors (.2).	6/13/2024	0.6	215.00	129.00	Legal - Case Administration
Josh McGraw	Updating claimants address per request.	6/13/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails with investors re: claims numbers, address changes and recorded investor call.	6/13/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with VA re: relativity access.	6/13/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review association agreement and sharing agreement, discuss with counsel KH.	6/14/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Email from counsel KE re call with JS, review letter re violation of order, need to withdraw counterclaim.	6/14/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review answer and counterclaim, email from counsel JS.	6/14/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review email from KA re distribution methodology, discuss with JPM.	6/14/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Discuss distribution methodology with GBW.	6/14/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Emails with claimants re: questions about distribution, addresses on file and claims numbers.	6/14/2024	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Review GoDaddy's mail activity to confirm investors have received emails and to provide them with the emails that are registered to receive notices.	6/14/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Call with claimant re: confirming address on file.	6/14/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Calls with claimants re: questions about the interim distribution process and verifying address.	6/14/2024	1.0	255.00	255.00	Legal - Case Administration
John Hall	Review distribution motion draft needs from KEA and discuss with JPM and GBW.	6/14/2024	0.5	310.00	155.00	Legal - Claims Administration and Objections
Geoff Winkler	Process deposits.	6/17/2024	0.3	340.00	102.00	Financial - Accounting/Auditing
Josh McGraw	Cleaning claims file to port inflows and outflows into claims file to create rising tide.	6/17/2024	0.7	255.00	178.50	Financial - Data Analysis
Geoff Winkler	Review letter re counterclaim and authorize distribution.	6/17/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review update from counsel KE re terms of letters.	6/17/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review motion to approve provisional settlement, comments to counsel KH.	6/17/2024	0.3	340.00	102.00	Financial - Litigation Consulting
Josh McGraw	Call with JS re: relativity access.	6/17/2024	0.2	255.00	51.00	Financial - Litigation Consulting
Anna Priebe	Communication with JPM re: distribution reserves.	6/17/2024	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Communication with JPM re: JS call.	6/17/2024	0.1	340.00	34.00	Legal - Case Administration

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
April 1, 2024 - June 30, 2024
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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Call with SB re: relativity access, files and new users. Emails to SB re: permissions and usernames.	6/17/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Communication with GBW re: JS call.	6/17/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Communication with AMP re: distribution reserves.	6/17/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to JS re: relativity status.	6/17/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors re: claims questions and distribution timeline.	6/17/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Creating rising tide to confirm distribution recommendation.	6/17/2024	1.0	255.00	255.00	Legal - Case Administration
Josh McGraw	Review of the data structure for document review. Emails with SB re: VA and JS access requirements and set up.	6/18/2024	0.3	255.00	76.50	Financial - Data Analysis
Geoff Winkler	Emails from JM and KH re sharing draft of proposed motion authorizing settlement.	6/18/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review update from KE re JS documents.	6/18/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Review proposed language updates for sharing agreement, discuss with JS.	6/18/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Call and communication with JS re: agreements and outstanding documents.	6/18/2024	0.5	255.00	127.50	Financial - Litigation Consulting
Geoff Winkler	Call with JPM re: litigation counsel request.	6/18/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Call with JPM re: discussing distribution methodology.	6/18/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Email to claimant re: investor call recording.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with KE re: litigation counsel documents.	6/18/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with GBW re: litigation counsel request.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KE and KH re: JS language changes in documents.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with GBW re: discussing distribution methodology.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to VA re: form request for access.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to JS re: form request for relativity.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Analyzing claimant recovery before receivership and forensic accounting report. Email to KA re: figures for the interim distribution motion.	6/18/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to JdC re: case findings for motion.	6/18/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing KE and KH comments on JS fee sharing agreement and association pleading.	6/18/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review proposed revisions to motion to approve settlement, discuss with counsel.	6/19/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Emails with counsel re Cox Communications.	6/19/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Email to KE re: mortgage release document review and power of attorney documents.	6/19/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KE re: personal guarantees.	6/19/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Review of changes made by JS and email requesting additional changes.	6/19/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing emails from JM, KA, KH and GBW re: settlement agreement.	6/19/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing KE's response for JS agreements.	6/19/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to JS re: requested changes to litigation documents.	6/19/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review proposed revisions to Allianz settlement.	6/20/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Execute association and sharing documents, scan and email to counsel.	6/20/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Review case conference report for DH litigation.	6/20/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Call with JM, KH, JPM, JM and RP re: AI motion and order discussion.	6/20/2024	0.4	340.00	136.00	Financial - Litigation Consulting
Josh McGraw	Call with JM, KH, GBW, JM and RP re: AI motion and order discussion.	6/20/2024	0.4	255.00	102.00	Financial - Litigation Consulting
Josh McGraw	Reviewing the list of investors under AI settlement and confirming contact information to notice appropriately. Email contact information to KH.	6/20/2024	0.4	255.00	102.00	Financial - Litigation Consulting
Geoff Winkler	Emails with counsel KA re rising tide analysis.	6/20/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Review holdback estimates, review email with counsel KH.	6/20/2024	0.2	340.00	68.00	Legal - Case Administration
Josh McGraw	Email to KH re: holdback estimates.	6/20/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KE re: updated JS documents.	6/20/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Updating holdback estimates with counsel figures.	6/20/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to KA re: outstanding items for interim distribution motion.	6/20/2024	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Review distribution plan issues with JBH.	6/20/2024	0.3	340.00	102.00	Legal - Claims Administration and Objections
John Hall	Review distribution plan issues with GBW.	6/20/2024	0.3	310.00	93.00	Legal - Claims Administration and Objections
Anna Priebe	Drafting status report.	6/21/2024	0.9	215.00	193.50	Legal - Case Administration
Geoff Winkler	Review dismissal of counterclaim.	6/24/2024	0.1	340.00	34.00	Financial - Litigation Consulting
Geoff Winkler	Execute updated agreement.	6/24/2024	0.1	340.00	34.00	Financial - Litigation Consulting

SEC v. Profit Connect Wealth Services, Inc. et al.
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Geoff Winkler	Review updated tolling agreement, execute and send to MDC.	6/24/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Geoff Winkler	Discussion with counsel KH re cover letter to notify investors of hearing on claims.	6/24/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Review court notice re hearing on fees and settlement.	6/24/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Communication with JPM re: rising tide calculations.	6/24/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Meeting with JPM re: discussion of rising tide scenario.	6/24/2024	0.2	340.00	68.00	Legal - Case Administration
John Hall	Review draft tolling agreement from MDC and discuss with GBW.	6/24/2024	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Updating claims contact information per claimant request and email correspondence with claimant.	6/24/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Meeting with GBW re: discussion of rising tide scenario.	6/24/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Summarizing distribution methodology scenarios and calculations. Email to KA re: same.	6/24/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with claimant re: questions about interim distribution, AG contact and estimate recoveries.	6/24/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Call with claimant to confirm claims information and questions about the distributions and recovery efforts.	6/24/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Emails with claimants re: questions about uses of funds and contact information for people to file complaints against defendants.	6/24/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing claims order and claims motion to confirm treatment of creditors and reserves.	6/24/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Creating a rising tide methodology to determine best methodology to include in interim distribution motion.	6/24/2024	1.4	255.00	357.00	Legal - Case Administration
Josh McGraw	Reviewing returned payments in forensic accounting and removing transactions to create the true return for six investors.	6/24/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Communication with GBW re: rising tide calculations.	6/24/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with claimant re: questions on interim distribution timeline.	6/24/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review draft letter to investors, discuss with counsel KH.	6/24/2024	0.2	340.00	68.00	Legal - Claims Administration and Objections
John Hall	Review claim payment scenarios drafted by JPM.	6/24/2024	0.5	310.00	155.00	Legal - Claims Administration and Objections
Josh McGraw	Reviewing joint conference report for DH litigation and outline for the conference.	6/25/2024	0.4	255.00	102.00	Financial - Litigation Consulting
Josh McGraw	Reviewing unclaimed property in NV and CA.	6/25/2024	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails with counsel re Cox collection agency.	6/25/2024	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Review and approve draft letter to Cox.	6/25/2024	0.1	340.00	34.00	Legal - Case Administration
Josh McGraw	Reviewing creditor correspondence and notices. Providing information to KE.	6/25/2024	0.3	255.00	76.50	Legal - Case Administration
Geoff Winkler	Meeting with JPM re: discussion of items needed for joint conference report.	6/26/2024	0.2	340.00	68.00	Financial - Litigation Consulting
Josh McGraw	Meeting with GBW re: discussion of items needed for joint conference report.	6/26/2024	0.2	255.00	51.00	Financial - Litigation Consulting
Geoff Winkler	Meeting with KH, KA, RP, JBH and JPM re: outstanding litigation, asset recovery and interim distribution.	6/26/2024	0.5	340.00	170.00	Legal - Case Administration
John Hall	Team meeting with KH, KA, JPM and GBW to discuss distributions, further recoveries, litigation.	6/26/2024	0.5	310.00	155.00	Legal - Case Administration
Josh McGraw	Creating notices for JN and TS investors and email to those investors.	6/26/2024	1.2	255.00	306.00	Legal - Case Administration
Josh McGraw	Email to KH re: notice to certain investors.	6/26/2024	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewing letter created by KE.	6/26/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Meeting with KH, KA, RP, JBH and GBW re: outstanding litigation, asset recovery and interim distribution.	6/26/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Emails with claimants re: confirming addresses and updating payment address.	6/27/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with claimant re: interim distribution motion questions and follow-up email.	6/27/2024	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Meeting with JBH re: rising tide distribution.	6/27/2024	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review draft interim distribution calculations and discuss with JPM.	6/28/2024	0.3	340.00	102.00	Legal - Case Administration
Josh McGraw	Discuss draft interim distribution calculations with GBW.	6/28/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Review and analysis of interim distribution calculations with JBH, and discuss questions with re: same.	6/28/2024	1.4	255.00	357.00	Legal - Case Administration
Josh McGraw	Updating claimant payee information per request and email confirmation.	6/28/2024	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing letter to creditor re: claim bar date.	6/28/2024	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Creating interim distribution summary between methodologies and emailing to JBH and GBW.	6/28/2024	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Calls with claimants re: interim distribution motion.	6/28/2024	0.4	255.00	102.00	Legal - Case Administration

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John Hall	Review and analysis of interim distribution calculations with JPM, and discuss questions with re: same.	6/28/2024	1.4	310.00	434.00	Legal - Claims Administration and Objections
Totals			<u>185.9</u>		<u>51,651.50</u>	

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Summary by Activity Category and Personnel						
Financial - Accounting/Auditing	Personnel	Firm	Hours	Rate	Amount	
Financial - Accounting/Auditing	Anna Priebe	AFS	0.0	215.00	\$ -	
Financial - Accounting/Auditing	Geoff Winkler	AFS	4.9	340.00	\$ 1,666.00	
Financial - Accounting/Auditing	Grace Radke	AFS	0.0	225.00	\$ -	
Financial - Accounting/Auditing	John Hall	AFS	0.0	310.00	\$ -	
Financial - Accounting/Auditing	Josh McGraw	AFS	0.2	255.00	\$ 51.00	
Financial - Accounting/Auditing	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Financial - Accounting/Auditing	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
Financial - Accounting/Auditing	Sara Bond	AFS	1.7	255.00	\$ 433.50	
			6.8		\$ 2,150.50	
Financial - Corporate Finance	Personnel	Firm	Hours	Rate	Amount	
Financial - Corporate Finance	Anna Priebe	AFS	0.0	215.00	\$ -	
Financial - Corporate Finance	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Corporate Finance	Grace Radke	AFS	0.0	225.00	\$ -	
Financial - Corporate Finance	John Hall	AFS	0.2	310.00	\$ 62.00	
Financial - Corporate Finance	Josh McGraw	AFS	0.0	255.00	\$ -	
Financial - Corporate Finance	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Financial - Corporate Finance	Phil Chen	AFS	0.0	215.00	\$ -	
Financial - Corporate Finance	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
			0.2		\$ 62.00	
Financial - Data Analysis	Personnel	Firm	Hours	Rate	Amount	
Financial - Data Analysis	Anna Priebe	AFS	0.0	215.00	\$ -	
Financial - Data Analysis	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Data Analysis	Grace Radke	AFS	0.0	225.00	\$ -	
Financial - Data Analysis	John Hall	AFS	0.4	310.00	\$ 124.00	
Financial - Data Analysis	Josh McGraw	AFS	5.5	255.00	\$ 1,402.50	
Financial - Data Analysis	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Financial - Data Analysis	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
Financial - Data Analysis	Sara Bond	AFS	0.6	255.00	\$ 153.00	
			6.5		\$ 1,679.50	
Financial - Litigation Consulting	Personnel	Firm	Hours	Rate	Amount	
Financial - Litigation Consulting	Anna Priebe	AFS	0.0	215.00	\$ -	
Financial - Litigation Consulting	Geoff Winkler	AFS	21.8	340.00	\$ 7,412.00	
Financial - Litigation Consulting	Grace Radke	AFS	0.0	225.00	\$ -	
Financial - Litigation Consulting	John Hall	AFS	0.4	310.00	\$ 124.00	
Financial - Litigation Consulting	Josh McGraw	AFS	7.4	255.00	\$ 1,887.00	
Financial - Litigation Consulting	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Financial - Litigation Consulting	Phil Chen	AFS	0.0	215.00	\$ -	
Financial - Litigation Consulting	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
			29.6		\$ 9,423.00	
Financial - Status Reports	Personnel	Firm	Hours	Rate	Amount	
Financial - Status Reports	Anna Priebe	AFS	0.1	215.00	\$ 21.50	
Financial - Status Reports	Geoff Winkler	AFS	0.4	340.00	\$ 136.00	
Financial - Status Reports	Grace Radke	AFS	0.0	225.00	\$ -	
Financial - Status Reports	John Hall	AFS	0.0	310.00	\$ -	

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Financial - Status Reports	Josh McGraw	AFS	1.0	255.00	\$ 255.00	
Financial - Status Reports	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Financial - Status Reports	Phil Chen	AFS	0.0	215.00	\$ -	
Financial - Status Reports	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
			1.5		\$ 412.50	
Financial - Tax Issues	Personnel	Firm	Hours	Rate	Amount	
Financial - Tax Issues	Anna Priebe	AFS	0.0	215.00	\$ -	
Financial - Tax Issues	Geoff Winkler	AFS	0.2	340.00	\$ 68.00	
Financial - Tax Issues	Grace Radke	AFS	0.0	225.00	\$ -	
Financial - Tax Issues	John Hall	AFS	0.2	310.00	\$ 62.00	
Financial - Tax Issues	Josh McGraw	AFS	1.7	255.00	\$ 433.50	
Financial - Tax Issues	Milana Barkhanoy	AFS	0.2	255.00	\$ 51.00	
Financial - Tax Issues	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
Financial - Tax Issues	Sara Bond	AFS	0.4	255.00	\$ 102.00	
			2.7		\$ 716.50	
Legal - Asset Analysis and Recovery	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Analysis and Recovery	Anna Priebe	AFS	0.3	215.00	\$ 64.50	
Legal - Asset Analysis and Recovery	Geoff Winkler	AFS	2.1	340.00	\$ 714.00	
Legal - Asset Analysis and Recovery	Grace Radke	AFS	0.0	225.00	\$ -	
Legal - Asset Analysis and Recovery	John Hall	AFS	1.4	310.00	\$ 434.00	
Legal - Asset Analysis and Recovery	Josh McGraw	AFS	12.0	255.00	\$ 3,060.00	
Legal - Asset Analysis and Recovery	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Legal - Asset Analysis and Recovery	Phil Chen	AFS	0.0	215.00	\$ -	
Legal - Asset Analysis and Recovery	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
			15.8		\$ 4,272.50	
Legal - Asset Disposition	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Disposition	Anna Priebe	AFS	0.0	215.00	\$ -	
Legal - Asset Disposition	Geoff Winkler	AFS	1.5	340.00	\$ 510.00	
Legal - Asset Disposition	Grace Radke	AFS	0.0	225.00	\$ -	
Legal - Asset Disposition	John Hall	AFS	0.0	310.00	\$ -	
Legal - Asset Disposition	Josh McGraw	AFS	8.1	255.00	\$ 2,065.50	
Legal - Asset Disposition	Milana Barkhanoy	AFS	0.0	255.00	\$ -	
Legal - Asset Disposition	Phil Chen	AFS	0.0	215.00	\$ -	
Legal - Asset Disposition	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
			9.6		\$ 2,575.50	
Legal - Case Administration	Personnel	Firm	Hours	Rate	Amount	
Legal - Case Administration	Anna Priebe	AFS	15.7	215.00	\$ 3,375.50	
Legal - Case Administration	Geoff Winkler	AFS	17.8	340.00	\$ 6,052.00	
Legal - Case Administration	Grace Radke	AFS	0.0	225.00	\$ -	
Legal - Case Administration	John Hall	AFS	3.5	310.00	\$ 1,085.00	
Legal - Case Administration	Josh McGraw	AFS	48.5	255.00	\$ 12,367.50	
Legal - Case Administration	Milana Barkhanoy	AFS	0.4	255.00	\$ 102.00	
Legal - Case Administration	Phil Chen	AFS	0.3	215.00	\$ 64.50	
Legal - Case Administration	Renee Dieffenderfer	AFS	1.0	255.00	\$ 255.00	
Legal - Case Administration	Sara Bond	AFS	0.1	255.00	\$ 25.50	
			87.3		\$ 23,327.00	

SEC v. Profit Connect Wealth Services, Inc. et al.
 Summary of Fees of Receiver and Retained Personnel
 April 1, 2024 - June 30, 2024
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Legal - Claims Administration and Objections		Firm	Hours	Rate	Amount	
Legal - Claims Administration and Objections	Anna Priebe	AFS	0.5	215.00	\$ 107.50	
Legal - Claims Administration and Objections	Geoff Winkler	AFS	2.4	340.00	\$ 816.00	
Legal - Claims Administration and Objections	Grace Radke	AFS	0.3	225.00	\$ 67.50	
Legal - Claims Administration and Objections	John Hall	AFS	4.6	310.00	\$ 1,426.00	
Legal - Claims Administration and Objections	Josh McGraw	AFS	17.9	255.00	\$ 4,564.50	
Legal - Claims Administration and Objections	Milana Barkhanoy	AFS	0.2	255.00	\$ 51.00	
Legal - Claims Administration and Objections	Phil Chen	AFS	0.0	215.00	\$ -	
Legal - Claims Administration and Objections	Renee Dieffenderfer	AFS	0.0	255.00	\$ -	
Legal - Claims Administration and Objections	Sara Bond	AFS	0.0	255.00	\$ -	
			25.9		\$ 7,032.50	
Overall Summary						
Totals	Personnel	Firm	Hours	Rate	Amount	
	Anna Priebe	AFS	16.6	215.00	\$ 3,569.00	
	Geoff Winkler	AFS	51.1	340.00	\$ 17,374.00	
	Grace Radke	AFS	0.3	225.00	\$ 67.50	
	John Hall	AFS	10.7	310.00	\$ 3,317.00	
	Josh McGraw	AFS	102.3	255.00	\$ 26,086.50	
	Milana Barkhanoy	AFS	0.8	255.00	\$ 204.00	
	Phil Chen	AFS	0.3	215.00	\$ 64.50	
	Renee Dieffenderfer	AFS	1.0	255.00	\$ 255.00	
	Sara Bond	AFS	2.8	255.00	\$ 714.00	
			185.9		\$ 51,651.50	
			185.9		\$ 51,651.50	
TOTAL FEES			185.9		\$ 51,651.50	

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Expenses of Receiver and Retained Personnel
April 1, 2024 - June 30, 2024

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Geoff Winkler	GoDaddy	GoDaddy - Internet/Online Fees	4/3/2024	27.99	Internet/Online Fees
John Hall	Extra Space Storage	Storage rent prorations Extra Space Storage	4/10/2024	81.25	Document and Asset Storage
John Hall	PACER	Miscellaneous annual charge from UPS Store for PC PO Box.	4/12/2024	444.00	Miscellaneous
John Hall	FedEx	UPS Store - Delivery services forwarding mail to Portland office.	4/12/2024	48.14	Courier/Shipping/Freight
Geoff Winkler	Fred Meyer	Alaska Airlines - Airfare	4/30/2024	578.10	Airfare
Geoff Winkler	Extra Space Storage	American Airlines - Airfare	4/30/2024	726.20	Airfare
Geoff Winkler	PACER	American Airlines - Airfare	5/1/2024	973.19	Airfare
John Hall	FedEx	Storage rent prorations Extra Space Storage	5/10/2024	81.25	Document and Asset Storage
Geoff Winkler	Fred Meyer	Alaska Airlines - Airfare	5/10/2024	298.10	Airfare
Geoff Winkler	Extra Space Storage	PACER - Internet/Online Fees	5/10/2024	4.50	Internet/Online Fees
Geoff Winkler	FedEx	Lyft - Taxi - Automotive Expense	5/13/2024	15.84	Automotive Expense
Geoff Winkler	Extra Space Storage	Lyft - Taxi - Automotive Expense	5/13/2024	16.79	Automotive Expense
Geoff Winkler	Extra Space Storage	Lyft - Taxi - Automotive Expense	5/13/2024	31.99	Automotive Expense
Geoff Winkler	PACER	Lyft - Taxi - Automotive Expense	5/13/2024	35.99	Automotive Expense
Geoff Winkler	FedEx	Lyft - Taxi - Automotive Expense	5/14/2024	22.52	Automotive Expense
Geoff Winkler	Fred Meyer	Port of Portland - Parking - Automotive Expense	5/14/2024	50.00	Automotive Expense
Geoff Winkler	Extra Space Storage	Marriott - Hotel (1 night)	5/14/2024	209.75	Hotel
John Hall	FedEx	Storage rent prorations Extra Space Storage	6/10/2024	81.25	Document and Asset Storage
Total				<u><u>3,726.85</u></u>	

	Geoff Winkler	John Hall	Josh McGraw	Anna Priebe	Total
Airfare	2,575.59	-	-	-	2,575.59
Automotive Expense	173.13	-	-	-	173.13
Courier/Shipping/Freight	-	48.14	-	-	48.14
Document and Asset Storage	-	243.75	-	-	243.75
Hotel	209.75	-	-	-	209.75
Individual Meals	-	-	-	-	-
Internet/Online Fees	32.49	-	-	-	32.49
Miscellaneous	-	444.00	-	-	444.00
Office Supplies	-	-	-	-	-
Personal Car Mileage	-	-	-	-	-
Printing/Photocopying/Stationery	-	-	-	-	-
Total	2,990.96	735.89	-	-	3,726.85

SEC v. Profit Connect Wealth Services, Inc. et al.
Receivership Estate Balance Sheet
April 1, 2024 - June 30, 2024

Attachment 3

Assets:

Cash	\$	10,251,503
Loan Receivable	\$	-
Marketable Securities	\$	-
Real Property ¹	\$	-
Personal Property ¹	\$	-
Private Equity Investments ¹	\$	-
Existing Litigation ^{2,3}	\$	-
Third Party Litigation ^{2,3}	\$	2,613,171
Professional Liability Litigation ^{2,3}	\$	5,000,000

Total Assets

\$ 17,864,673

Liabilities:

State/Federal Taxes ⁴	\$	-
Property Taxes ⁴	\$	-
Admin Holdback ¹	\$	434,234
Total Liabilities	\$	434,234

Claims:¹

Investors ⁵	\$	21,802,010
Creditors ⁵	\$	4,999
Total Claims	\$	21,807,008

Total Liabilities plus Claims

\$ 22,241,242

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. Amount based on current amount Receiver intends to recommend to the Court for approval.

**SEC v. Profit Connect Wealth Services, Inc. et al.
Receiver's Cash Receipts and Disbursements
April 1, 2024 - June 30, 2024**

Attachment 4

Beginning Balance of Cash in Receivership Estate on April 1, 2024	\$ 10,129,837.50
Deposits:	\$ 124,888.11
Payments:	\$ (3,222.85)
Ending Balance of Cash in Receivership Estate on June 30, 2024	<u>\$ 10,251,502.76</u>

EXHIBIT 2

EXHIBIT 2

DECLARATION OF KARA B. HENDRICKS

KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
KYLE A. EWING, ESQ.
Nevada Bar No. 14051
GREENBERG TRAUERIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: hendricksk@gtlaw.com
ewingk@gtlaw.com

KYRA E. ANDRASSY, ESQ.*
*Admitted Pro Hac Vice
RAINES FELDMAN LITRELL LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Telephone: (310) 440-4100
Facsimile: (949) 247-3998
Email: kandrassy@raineslaw.com

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

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**DECLARATION OF KARA B.
HENDRICKS IN SUPPORT OF THE
TWELFTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE RECEIVER
AND HIS PROFESSIONALS FOR THE
PERIOD FROM APRIL 1, 2024,
THROUGH JUNE 30, 2024**

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

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

...

2. I make this declaration in support of the I submit this declaration in support of the Receiver's Twelfth Application for Allowance and Payment of Fees and Costs of the Receiver and His Professionals for the Period from April 1, 2024, Through June 30, 2024 ("Twelfth Application"), in connection with Profit Connect Wealth Services, Inc. This declaration is based on my personal knowledge, except where made on information and belief, and as to those matters, I believe them to be true.

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

4. Attached to this declaration is a true and correct copy of the invoices for the services of my firm for the period from April 1, 2024, through June 30, 2024 (the "Application Period").

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

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

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

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

9. As reflected in the attached invoice, and pursuant to the Receivership Order (ECF No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46), professionals at Greenberg Traurig assisted the Receiver as follows during the Application Period: assessing

1 potential claw-back actions; communication with promoters and effort to resolve claims outside
 2 of litigation; assisting with preparation and filing of status reports; preparation of stipulations to
 3 sale remaining real property and communication with SEC regarding same; working with outside
 4 counsel on third party litigation matters; preparation of motion to approve potential settlement with
 5 Allianz and attend hearing regarding same.

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

9 11. I hereby certify that I have read the Receiver's Twelfth Application to which this
 10 declaration will be attached.

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

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

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

24 Executed on September 4, 2024.

25 /s/ Kara B. Hendricks

26 KARA B. HENDRICKS
 27 Declarant
 28

EXHIBIT A

EXHIBIT A

GT Invoices

April 2024



Invoice No. : 1000665701
File No. : 209375.010200
Bill Date : May 20, 2024

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

INVOICE

Re: Profit Connect Receivership

Legal Services through April 30, 2024:

Total Fees: \$ 6,008.70

Current Invoice: \$ 6,008.70

Previous Balance (see attached statement): \$ 25,097.03

Total Amount Due: \$ 31,105.73

KBH:LC

Tax ID: 13-3613083



Invoice No.: 1000665701

File No.: 209375.010200

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

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: 1000665701*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	6,008.70
Previous Balance:	\$	25,097.03
Total Amount Due:	\$	31,105.73

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: 1000665701*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000665701
File No. : 209375.010200

**PO Box 936769
ATLANTA GA 31193-6769**

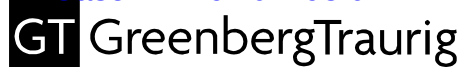
Wire fees may be assessed by your bank.

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

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

KBH:LC

Tax ID: 13-3613083



Invoice No.: 1000665701
 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
05/03/23	1000298043	1,154.13	0.00	0.00	1,154.13
05/03/23	1000298376	844.60	0.00	0.00	844.60
05/05/23	1000303926	393.78	0.00	0.00	393.78
06/08/23	1000340021	1,378.75	0.00	0.00	1,378.75
07/10/23	1000357968	525.42	0.00	0.00	525.42
08/24/23	1000397017	1,093.54	0.00	0.00	1,093.54
09/14/23	1000417401	138.87	0.00	0.00	138.87
10/16/23	1000453412	410.41	0.00	0.00	410.41
12/08/23	1000519190	1,361.30	0.00	0.00	1,361.30
01/16/24	1000537004	216.60	0.00	0.00	216.60
02/12/24	1000568047	3,895.36	0.00	0.00	3,895.36
03/15/24	1000596622	333.46	0.00	0.00	333.46
04/15/24	1000627936	7,464.85	355.26	0.00	7,820.11
Totals:		\$ 24,741.77	\$ 355.26	\$ 0.00	\$ 25,097.03

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>
04/04/24	Kara B. Hendricks	Voicemail message from S. Pophal regarding payment plan;	0.20	96.05
04/05/24	Kyle Ewing	Review recent stipulation in third-party recovery pending in the EJDC; email communication with K. Hendricks and G. Winkler re: the same	0.20	68.00
04/06/24	Kyle Ewing	Email communication with G. Winkler and K. Hendricks re: call Monday on third-party recovery pending in EJDC	0.20	68.00
04/09/24	Kara B. Hendricks	Attention to emails regarding Allianz promoter list;	0.10	48.02
04/10/24	Kara B. Hendricks	Attention to emails regarding Allianz demand and call with R. Paddock to discuss same (.3); Attention to emails and follow-up call to A. Shukla regarding payment for promotion amounts and correspond with J. McGraw regarding same and provide Shukla wire instructions (.3); Follow-up with J. McGraw regarding J. Skelley payment (.1);	0.70	336.17
04/12/24	Kara B. Hendricks	Telephone call with A. Shukla and follow-up email regarding payment; Update G. Winkler;	0.20	96.05
04/16/24	Kara B. Hendricks	Correspond with K. Andrassy regarding claims hearing and update for status report;	0.10	48.02
04/17/24	Kara B. Hendricks	Participate in team call with G. Winkler, J. McGraw, K. Andrassy, and Texas team to discuss asset recovery efforts including Texas updates, communication with promoters and employees; offer on Searchlight properties and upcoming claims hearing;	0.40	192.10
04/18/24	Kara B. Hendricks	Follow-up with S. Morrill regarding tracking of responses to demand letters and next steps;	0.20	96.05
04/19/24	Kara B. Hendricks	Review and revise status report and correspond with A. Preibe and K. Andrassy regarding same;	0.60	288.20
04/19/24	Kara B. Hendricks	Review and revise stipulation for sale of Searchlight properties and correspond with J. McGraw regarding same; Circle stipulation and background information to SEC for review;	0.30	144.07
04/21/24	Kara B. Hendricks	Review information from J. McGraw and update JC Commercial stipulation and recirculate for review and further comment/approval;	0.80	384.20

04/22/24	Kara B. Hendricks	Review offer of judgment and correspond with G. Winkler regarding same;	0.20	96.05
04/22/24	Kara B. Hendricks	Correspond with J. McGraw regarding title review and approval of Searchlight stipulation;	0.10	48.02
04/22/24	Kara B. Hendricks	Respond to email from D. Palka regarding demand letter and amounts owed to Receiver;	0.10	48.02
04/23/24	Kyle Ewing	Review draft opposition to motion to dismiss in third-party recovery action in the EJDC and provide proposed edits/comments to the same; email communication with G. Winkler, K. Andrassy, and K. Hendricks re: the same	0.40	136.00
04/23/24	Kara B. Hendricks	Review and revise opposition to motion to dismiss Hayes complaint and provide additional authorities in support of same;	1.10	528.27
04/23/24	Kara B. Hendricks	Follow-up with SEC regarding Searchlight stipulation;	0.10	48.02
04/24/24	Kyle Ewing	Review and provide comments/edits to draft response to defendants' motion to dismiss in third-party recovery proceeding pending in the EJDC (.8); review legal research on statute of limitations in connection with the same (1.5)	2.30	782.00
04/24/24	Kara B. Hendricks	Send email to T. Jackson regarding bonus and commission payment; Confer with S Morrill regarding identifying unresponsive promoters for further litigation and Nevada State Bank regarding Cartwright account.	0.40	192.10
04/24/24	Kara B. Hendricks	Attention to emails regarding state court briefing and discuss research and analysis with K. Ewing;	0.30	144.07
04/24/24	Kara B. Hendricks	Review and revise G. Winkler declaration (.1); Revise summary section of opposition brief (.3);	0.40	192.10
04/24/24	Steph Morrill	Evaluate records received from AFS which relate to promoter Thomas Jackson in prep of discussion with K.Hendricks regarding Promoter responses to March demand letters and next steps (.3); Discussion held with K.Hendricks regarding promoters and NSB regarding Cartwright (.2); Revise promoter tracker based on discussion with K.Hendricks and circulate same for her review (1.7)	2.20	385.00
04/24/24	Christian Spaulding	Communications with team regarding jurisdiction for proceedings against individuals.	0.20	63.75
04/25/24	Kyle Ewing	Review submission of response brief to motion to dismiss in third-party proceeding in state court; communication with K. Hendricks re: the same	0.40	136.00
04/25/24	Kara B. Hendricks	Call with D. Palka regarding claim(.8); Send follow-up email with requested information (1); Update G. Winkler regarding proposed repayment plan (.1);	1.00	480.25

04/25/24	Steph Morrill	Draft letter to Nevada State Bank related to Cartwright account (promoter) and circulate to K.Hendricks for review (1.3); Revise promoter tracker to correct information, re-calculate amounts per category and circulate to K. Hendricks (.8)	2.10	367.50
04/30/24	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.1);	0.10	17.50
			<hr/>	
			Total Hours:	15.40
			Total Amount:	\$ 5,529.58

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

Timekeeper Name	Hours Billed	Base Rate	Total \$ Amount
Kyle Ewing	3.50	400.00	1,400.00
Kara B. Hendricks	7.30	565.00	4,124.50
Christian Spaulding	0.20	375.00	75.00
Steph Morrill	4.40	325.00	1,430.00
Totals:	15.40		\$ 7,029.50

Summary of Fees (Discounted Rates)

Timekeeper Name	Hours Billed	Average Discounted Rate	Total \$ Amount
Kyle Ewing	3.50	340.00	1,190.00
Kara B. Hendricks	7.30	480.25	3,505.83
Christian Spaulding	0.20	318.75	63.75
Steph Morrill	4.40	175.00	770.00
Totals:	15.40		\$ 5,529.58

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/24	Kyle Ewing	Bi-weekly GT meeting to addressing outstanding tasks and next steps, including status of third-party litigation and upcoming events therein, as well as attempts to discuss repayment by promoters of the scheme	0.10	34.00
04/02/24	Steph Morrill	Conference with K.Hendricks, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.1); Update Winkler pleadings and discovery chart with details from team conference (.1);	0.20	35.00
04/18/24	Kyle Ewing	Conference re: outstanding items and next steps with S. Morrill, K. Hendricks, and C. Spaulding, including following up on demand letters to various promoters who were paid significant amounts of money belonging to the Estate, a plan for claims and distributions and the process for the same, and other items	0.30	102.00
04/30/24	Kyle Ewing	Participate in GT team meeting with S. Morrill, C. Spaulding, and K. Hendricks, including discussion of developments in third-party recovery litigation and next steps for pursuing promoters who have retained receivership assets for benefit of the estate; follow up on other items	0.20	68.00
Total Hours:			0.80	
Total Amount:				\$ 239.00

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>
Kyle Ewing	0.60	400.00	240.00
Steph Morrill	0.20	325.00	65.00
Totals:	0.80		\$ 305.00

Summary of Fees (Discounted Rates)

Timekeeper Name	Hours Billed	Average Discounted Rate	Total \$ Amount
Kyle Ewing	0.60	340.00	204.00
Steph Morrill	0.20	175.00	35.00
Totals:	0.80		\$ 239.00

TASK CODE: GW011 STATUS REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/24	Kara B. Hendricks	Review and revise status report and correspond with A. Preibe and K. Andrassy regarding same; Send draft to SEC for consideration;	0.50	240.12
			<hr/>	
			Total Hours:	0.50
			Total Amount:	\$ 240.12

TIMEKEEPER SUMMARY FOR TASK CODE GW011.

STATUS REPORTS

Summary of Fees (Base Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Base Rate</u>	<u>Total \$ Amount</u>
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>
Kyle Ewing	4.10	400.00	1,640.00
Kara B. Hendricks	7.80	565.00	4,407.00
Christian Spaulding	0.20	375.00	75.00
Steph Morrill	4.60	325.00	1,495.00
Totals:	16.70		\$ 7,617.00

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kyle Ewing	4.10	340.00	1,394.00
Kara B. Hendricks	7.80	480.25	3,745.95
Christian Spaulding	0.20	318.75	63.75
Steph Morrill	4.60	175.00	805.00
Totals:	16.70		\$ 6,008.70

Invoice No.: 1000665701
Re: Profit Connect Receivership
Matter No.: 209375.010200

Description of Expenses Billed:

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

May 2024



Invoice No. : 1000684471
File No. : 209375.010200
Bill Date : June 11, 2024

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

INVOICE

Re: Profit Connect Receivership

Legal Services through May 31, 2024:

Total Fees: \$ 4,718.58

Current Invoice: \$ 4,718.58

Previous Balance (see attached statement): \$ 31,105.73

Total Amount Due: \$ 35,824.31

KBH:LC
Tax ID: 13-3613083



Invoice No.: 1000684471
File No.: 209375.010200

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

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: 1000684471*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$ 4,718.58
Previous Balance:	\$ 31,105.73
Total Amount Due:	\$ 35,824.31

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: 1000684471*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000684471
File No. : 209375.010200

**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.**

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

KBH:LC

Tax ID: 13-3613083



Invoice No. : 1000684471
 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
05/03/23	1000298043	1,154.13	0.00	0.00	1,154.13
05/03/23	1000298376	844.60	0.00	0.00	844.60
05/05/23	1000303926	393.78	0.00	0.00	393.78
06/08/23	1000340021	1,378.75	0.00	0.00	1,378.75
07/10/23	1000357968	525.42	0.00	0.00	525.42
08/24/23	1000397017	1,093.54	0.00	0.00	1,093.54
09/14/23	1000417401	138.87	0.00	0.00	138.87
10/16/23	1000453412	410.41	0.00	0.00	410.41
12/08/23	1000519190	1,361.30	0.00	0.00	1,361.30
01/16/24	1000537004	216.60	0.00	0.00	216.60
02/12/24	1000568047	3,895.36	0.00	0.00	3,895.36
03/15/24	1000596622	333.46	0.00	0.00	333.46
04/15/24	1000627936	7,464.85	355.26	0.00	7,820.11
05/20/24	1000665701	6,008.70	0.00	0.00	6,008.70
Totals:		\$ 30,750.47	\$ 355.26	\$ 0.00	\$ 31,105.73

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>
05/01/24	Kara B. Hendricks	Participate in call with J. McGraw, J. Hall, K. Andrassy, and A. Preibe and discuss asset recovery efforts, pending lawsuits and actions, promoter contact and upcoming claims hearing;	0.40	192.10
05/06/24	Kara B. Hendricks	Follow-up with K. Wanner regarding selling Searchlight Property;	0.10	48.02
05/06/24	Christian Spaulding	Communications with team regarding stipulation for sale of parcel in Searchlight, Nevada.	0.20	63.75
05/06/24	Christian Spaulding	Review and finalize draft stipulation for the sale of parcel in Searchlight, Nevada.	0.70	223.13
05/06/24	Christian Spaulding	Communications with team regarding final version of stipulation for sale of Searchlight, Nevada parcel and filing of the same.	0.20	63.75
05/07/24	Kyle Ewing	Follow-up email communication with J. McGraw and G. Winkler re: stipulation and order for sale of the Searchlight property	0.20	68.00
05/09/24	Kara B. Hendricks	Attention to email from J. Moore regarding Allianz settlement proposal and requests and follow-up with G. Winkler and K. Andrassy regarding same (.2); Participate in call with G. Winkler and Texas counsel to discuss settlement logistics (.3);	0.50	240.12
05/09/24	Kara B. Hendricks	Review proposed tolling agreement language from M. Diaz-Cortes and provide feedback regarding same;	0.20	96.05
05/10/24	Kara B. Hendricks	Attention to emails regarding Allianz settlement proposal and follow-up;	0.10	48.06
05/12/24	Kara B. Hendricks	Review motion for order allowing/disallowing claims in advance of hearing;	0.30	144.07
05/13/24	Kara B. Hendricks	Attend hearing on motion to allow/disallow claims (1.0); Debrief with G. Winkler and follow-up with K. Andrassy regarding draft order (.3);	1.30	624.32
05/14/24	Kyle Ewing	Conference with GT team to discuss outstanding items and next steps, including order approving distribution, ongoing third-party litigation in Texas and settlement of the same, and issues with claim bar order vis-a-vis the Texas litigation	0.20	68.00
05/14/24	Kara B. Hendricks	Follow-up with S. Morrill regarding promoter analysis and next steps;	0.20	96.05
05/15/24	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, K. Andrassy, and Texas team to discuss	0.60	288.15

		settlement in third part action, distribution plan, and asset recovery efforts;		
05/22/24	Kara B. Hendricks	Review and revise draft of Allianz agreement and follow-up with J. Moore and TX team;	0.40	192.10
05/22/24	Kara B. Hendricks	Review and revise response to Nicholas MSJ and correspond with J. Moore regarding same;	1.00	480.25
05/23/24	Kara B. Hendricks	Attention to emails regarding Allianz settlement;	0.10	48.02
05/24/24	Kara B. Hendricks	Respond to email from D. Palka and provide information for payment plan (.2); Review tracking chart for promoters and follow-up with G. Winkler to schedule time to further discuss (.4);	0.60	288.15
05/28/24	Kyle Ewing	Email communication with G. Winkler and K. Hendricks re: improper attempts to collect debt by Cox and/or its debt collection agency	0.30	102.00
05/28/24	Kara B. Hendricks	Respond to email from J. Selik (.1); Review email from J. Moore and revisions to Allianz settlement agreement and request C. Spaulding being preparation of motion to approve Allianz agreement (.2); Revise correspondence to Nevada State Bank regarding Cartwright deposit and turnover (.7); Correspond with E. Esocbar-Gaddi regarding service of Nevada State Bank letter (.1);	1.10	528.27
05/29/24	Kyle Ewing	Participate in GT team meeting to discuss outstanding tasks and projects, including settlement of TX lawsuit and negotiations surrounding a claim bar/next steps for achieving the same; a motion to approve settlement; the ongoing distribution/claims process, drafting a demand letter associated with unlawful collection activities of Cox against the Receiver, and lawsuit filed against D. Hayes in the EJDC	0.10	34.00
05/29/24	Kara B. Hendricks	Participate in call with J. McGraw, K. Andrassy and R. Paddock regarding case matters including TX proceeding, asset recovery efforts and distribution;	0.40	192.10
05/30/24	Kara B. Hendricks	Participate in call with G. Winkler and J. McGraw to discuss promoter follow-up and potential litigation;	0.50	240.12
			<hr/>	
Total Hours:			9.70	
Total Amount:				\$ 4,368.58

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>
Kyle Ewing	0.80	400.00	320.00
Kara B. Hendricks	7.80	565.00	4,407.00
Christian Spaulding	1.10	375.00	412.50
Totals:	9.70		\$ 5,139.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	0.80	340.00	272.00
Kara B. Hendricks	7.80	480.25	3,745.95
Christian Spaulding	1.10	318.75	350.63
Totals:	9.70		\$ 4,368.58

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/14/24	Steph Morrill	Update Winkler pleadings and discovery chart with pertinent details from recent filings and status of projects and circulate same to team ahead team meeting (.2); Conference with K.Hendricks, K.Ewing, and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings (.1); Update Winkler pleadings and discovery chart with details from team conference (.4);	0.70	122.50
05/16/24	Steph Morrill	Update Winkler pleadings and discovery chart with details from team conference and with pertinent details from post-meeting follow up tasks;	0.60	105.00
05/28/24	Steph Morrill	Update Winkler pleadings and discovery chart with pertinent details from recent filings and status of projects and circulate same to team ahead of next day team meeting;	0.50	87.50
05/30/24	Steph Morrill	Update Winkler pleadings and discovery chart with details from team conference and with pertinent details from post-meeting follow up tasks;	0.20	35.00
Total Hours:			2.00	
Total Amount:				\$ 350.00

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>
Steph Morrill	2.00	325.00	650.00
Totals:	2.00		\$ 650.00

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Steph Morrill	2.00	175.00	350.00
Totals:	2.00		\$ 350.00

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kyle Ewing	0.80	400.00	320.00
Kara B. Hendricks	7.80	565.00	4,407.00
Christian Spaulding	1.10	375.00	412.50
Steph Morrill	2.00	325.00	650.00
Totals:	11.70		\$ 5,789.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kyle Ewing	0.80	340.00	272.00
Kara B. Hendricks	7.80	480.25	3,745.95
Christian Spaulding	1.10	318.75	350.63
Steph Morrill	2.00	175.00	350.00
Totals:	11.70		\$ 4,718.58

Invoice No.: 1000684471
Re: Profit Connect Receivership
Matter No.: 209375.010200

Page 7

Description of Expenses Billed:

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

JUNE 2024



Invoice No. : 1000709024
 File No. : 209375.010200
 Bill Date : July 8, 2024

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

INVOICE

Re: Profit Connect Receivership

Legal Services through June 30, 2024:

Total Fees: \$ 10,747.96

Expenses:

UPS Charges

46.49

Total Expenses: \$ 46.49

Current Invoice: \$ 10,794.45

Previous Balance (see attached statement): \$ 35,824.31

Total Amount Due: \$ 46,618.76

KBH:LC

Tax ID: 13-3613083



Invoice No.: 1000709024

File No.: 209375.010200

Important: If you receive a request to change the manner or location of your payment to Greenberg Traurig, please immediately contact Greenberg Traurig's accounting team at 305-418-6503. To assure that your payment is made and received correctly, please do not make any payment per the requested change until you verbally confirm with Greenberg Traurig that the change is legitimate.

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: 1000709024*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	10,794.45
Previous Balance:	\$	35,824.31
Total Amount Due:	\$	46,618.76

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: 1000709024*
BILLING
PROFESSIONAL: Kara B. Hendricks

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

KBH:LC

Tax ID: 13-3613083



Invoice No.: 1000709024
File No. : 209375.010200

**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.**

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

KBH:LC

Tax ID: 13-3613083



Invoice No.: 1000709024
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
05/03/23	1000298043	1,154.13	0.00	0.00	1,154.13
05/03/23	1000298376	844.60	0.00	0.00	844.60
05/05/23	1000303926	393.78	0.00	0.00	393.78
06/08/23	1000340021	1,378.75	0.00	0.00	1,378.75
07/10/23	1000357968	525.42	0.00	0.00	525.42
08/24/23	1000397017	1,093.54	0.00	0.00	1,093.54
09/14/23	1000417401	138.87	0.00	0.00	138.87
10/16/23	1000453412	410.41	0.00	0.00	410.41
12/08/23	1000519190	1,361.30	0.00	0.00	1,361.30
01/16/24	1000537004	216.60	0.00	0.00	216.60
02/12/24	1000568047	3,895.36	0.00	0.00	3,895.36
03/15/24	1000596622	333.46	0.00	0.00	333.46
04/15/24	1000627936	7,464.85	355.26	0.00	7,820.11
05/20/24	1000665701	6,008.70	0.00	0.00	6,008.70
06/11/24	1000684471	4,718.58	0.00	0.00	4,718.58
Totals:		\$ 35,469.05	\$ 355.26	\$ 0.00	\$ 35,824.31

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>
06/05/24	Kara B. Hendricks	Telephone call with J. Selik regarding status of malpractice case; Review CV for new counsel and correspond with G. Winkler regarding same;	0.30	144.08
06/06/24	Kyle Ewing	Research proposed co-counsel suggested by counsel to Receiver with respect to the estate's third-party claim against D. Hayes and his law firm/former firms; email communication with K. Hendricks re: the same	0.40	136.00
06/06/24	Kara B. Hendricks	Confer with C. Spaulding regarding motion to approve Allianz settlement and respond to email from R. Paddock regarding same;	0.20	96.05
06/06/24	Kara B. Hendricks	Attention to correspondence from Nevada State Bank regarding release of Cartwright funds and related follow-up with counsel and G. Winkler;	0.20	96.05
06/07/24	Kyle Ewing	Conference with K. Hendricks re: potential need to bring on additional attorney to assist J. Selik with third-party litigation against D. Hayes; email communication with G. Winkler re: the same	0.40	136.00
06/07/24	Kara B. Hendricks	Respond to email from G. Winkler regarding offer of judgment in malpractice case; Confer with K. Ewing on proposed counsel to assist with malpractice proceeding;	0.30	144.08
06/10/24	Kyle Ewing	Conference with K. Hendricks, J. McGraw, and G. Winkler re: motion for further interim distribution and selection of litigation counsel to support the Receiver in claw-back actions against net investors, as well as retention of additional litigation counsel for claim against D. Hayes and Hayes Wakayama	0.40	136.00
06/10/24	Kara B. Hendricks	Call with G. Winkler, J. McGraw and K. Ewing regarding communication from J. Selik and estimation of fees to allow for distribution;	0.30	144.08
06/10/24	Kara B. Hendricks	Review outline for investor meeting and respond to email from A. Priebe; Discuss attendance at same with C. Spaulding;	0.20	96.05
06/11/24	Kara B. Hendricks	Correspond with S. Morrill regarding additional letter to promoters prior to filing suit;	0.10	48.03
06/11/24	Christian Spaulding	Attend investor meeting.	0.40	127.50
06/12/24	Kyle Ewing	Review counterclaim submitted in third	0.60	204.00

		party litigation; email communication with G. Winkler; K. Hendricks, and J. McGraw re: the same		
06/12/24	Kara B. Hendricks	Attention to counterclaim filed by D. Hayes and correspond with G. Winkler regarding same;	0.10	48.03
06/13/24	Kyle Ewing	Review receivership order in connection with determining whether counterclaim asserted by D. Hayes violates the stay of litigation (0.2); email communication with K. Hendricks and G. Winkler re: the same (0.2); draft letter to counsel for Hayes demanding the counterclaim be voluntarily dismissed (1.7); research law re: abuse of process in connection with the same (0.3); email communication with J. Selik re: the same (0.2)	2.60	884.00
06/13/24	Kara B. Hendricks	Correspond with K. Ewing regarding impact of receivership order on counterclaim asserted by Hayes(.1); Correspond with J. McGraw regarding motion to approve TX settlement (.2);	0.20	96.05
06/14/24	Kyle Ewing	Review and revise letter to T. McGrath re: improper filing of counterclaim against the Receiver and Profit Connect for review of G. Winkler and K. Hendricks (1.3); telephonic conference with J. Selik, Receiver's counsel in the Hayes malpractice litigation, re: the same (.3); email communication with Winkler and Hendricks (.2); follow-up email communication with J. Selik (.1)	1.90	646.00
06/14/24	Kara B. Hendricks	Attention to emails regarding Hayes counterclaims;	0.10	48.03
06/17/24	Kyle Ewing	Email communication with J. Selik re: letter to T. McGrath (counsel for D. Hayes) re: improper filing of counterclaim against Receiver in malpractice litigation against Hayes and his law firms (.2); further review and revision to the letter (1.5); follow up by email with T. McGrath and T. Rivich (.1)	1.80	612.00
06/17/24	Kyle Ewing	Review association agreement between Breeden and Selik in connection with D. Hayes litigation; email communication with G. Winkler re: the same	0.60	204.00
06/17/24	Kara B. Hendricks	Follow-up with C. Spaulding regarding motion to approve Allianz settlement and discuss claims bar issues (.2); Review and revise draft motion and circulate to team for review and comment (.8);	1.00	480.25
06/17/24	Christian Spaulding	Evaluate authority supporting request for claim bar as applicable to Allianz Settlement Agreement	1.80	573.75
06/17/24	Christian Spaulding	Draft Motion to Approve Settlement Agreement with Allianz.	1.10	350.63
06/18/24	Kyle Ewing	Follow up with J. McGraw re: J. Selik's association of A. Breeden to assist him	0.40	136.00

		with the Hayes litigation; review updated consent to association in connection with the same		
06/18/24	Kara B. Hendricks	Discuss letters to promoters with S. Morrill and tracking of same;	0.10	48.03
06/18/24	Kara B. Hendricks	Attention to email from K. Andrassy regarding settlement motion; Respond to email from J. Moore; Follow-up with C. Spaulding regarding draft order; Discuss motion with G. Winkler;	0.30	144.08
06/18/24	Christian Spaulding	Draft proposed order granting Motion to Approve Allianz Settlement.	0.40	127.50
06/19/24	Kyle Ewing	Email communication with G. Winkler re: harassing emails/calls/letters from debt collector related to Profit Connect's unpaid vendor bills; email with K. Hendricks re: the same	0.30	102.00
06/19/24	Kara B. Hendricks	Review comments provided to motion for approval of Allianz settlement and correspond with R. Paddock and team regarding same;	0.30	144.01
06/19/24	Kara B. Hendricks	Prepare second demand letter to Profit Connect promoters and follow-up with S. Morrill and E. Escobar-Gaddi to duplicate and send same to promoters previously identified;	0.50	240.13
06/20/24	Kyle Ewing	Email communication with J. Selik and A. Breeden re: timing of motion to enforce litigation stay w/r/t counterclaim filed by D. Hayes (.5); review appointment order and letter to T. McGrath and T. Rivich (counsel for Hayes) in connection with the same (.3); follow-up with McGrath and Rivich re: the Receiver's dismissal of the counterclaim (.1)	0.90	306.00
06/20/24	Kyle Ewing	Review latest version of the consent to J. Selik's association of A. Breeden in connection with his pursuit of the Hayes malpractice claim; email communication with J. McGraw re: the same	0.20	68.00
06/20/24	Kara B. Hendricks	Participate in call with Texas team to review proposed revisions to motion to approve Allianz settlement and draft order (.4); Update documents based on discussion and settlement agreement language and finalize motion (.9);	1.30	624.33
06/24/24	Kyle Ewing	Conference with K. Hendricks re: update from J. Selik re: progress pursuing Hayes claim; telephonic conference with G. Winkler and Hendricks re: the same	0.30	102.00
06/24/24	Kyle Ewing	Email communication with G. Winkler, K. Hendricks re: voluntary dismissal of counterclaim against the Receiver filed by D. Hayes and next steps; follow up with J. Selik and A. Breeden re: the same; email communication with counsel for Hayes re: the same	0.40	136.00

06/24/24	Kara B. Hendricks	Review minute order scheduling hearing on fee motion and Allianz settlement; Update team regarding same; Follow-up with J. McGraw regarding service of Allianz motion and notice of hearing; Review and revise draft letter to counsel regarding hearing;	0.50	240.13
06/24/24	Kara B. Hendricks	Return call to J. Selik and update G. Winkler regarding issues raised;	0.60	288.15
06/24/24	Christian Spaulding	Draft letter regarding proposed settlement with Allianz per discussion with K. Hendricks.	1.20	382.50
06/25/24	Kyle Ewing	Draft, revise, and finalize letter to law firm representing Cox re: inappropriate debt collection conduct w/r/t the receivership entities' prior contracts with Cox (1.8); email communication with G. Winkler and A. Rosehill (GT staff) re: the same (0.4); review receivership order in connection with the same (0.1)	2.30	782.00
06/26/24	Kara B. Hendricks	Confer with S. Morrill regarding finalizing promoter letters;	0.10	48.03
06/26/24	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, K. Andrassy, J. McGraw and R. Paddock to discuss case issues including distribution motion, asset recovery efforts and scheduled hearings;	0.50	240.13
06/26/24	Steph Morrill	Prepare letters, based on K.Hendricks draft, to all promoters who did not respond to letters sent out on March 13th and work with copy center to prepare envelopes of same;	3.30	577.50
06/27/24	Kara B. Hendricks	Follow-up with E. Escobar-Gaddi and S. Morrill regarding letters to promoters and monitoring responses;	0.10	48.03
06/27/24	Steph Morrill	Perform quality review of finalized second demand letters to promoters and communications with E.Escobar-Gaddi regarding Brocksom letter; Work with copy center to finalize letters and envelopes for mail;	0.60	105.00
06/30/24	Kyle Ewing	Evaluate communications from J. Selik re: his request to substitute A. Breeden and evaluate options for moving forward in the Hayes litigation; email communication with G. Winkler, J. Hall, and K. Hendricks re: the same	0.50	170.00

Total Hours: 30.10

Total Amount: \$ 10,510.21

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>
Kyle Ewing	14.00	400.00	5,600.00
Kara B. Hendricks	7.30	565.00	4,124.50
Christian Spaulding	4.90	375.00	1,837.50
Steph Morrill	3.90	325.00	1,267.50
Totals:	30.10		\$ 12,829.50

Summary of Fees (Discounted Rates)

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Average Discounted Rate</u>	<u>Total \$ Amount</u>
Kyle Ewing	14.00	340.00	4,760.00
Kara B. Hendricks	7.30	480.25	3,505.83
Christian Spaulding	4.90	318.75	1,561.88
Steph Morrill	3.90	175.00	682.50
Totals:	30.10		\$ 10,510.21

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/11/24	Steph Morrill	Update Winkler pleadings and discovery chart with pertinent details from recent filings and status of projects and circulate same to team;	0.30	52.50
06/18/24	Kyle Ewing	Email communication providing updates re: outstanding tasks and next steps in lieu of attending weekly GT team meeting, including update re: Hayes litigation and improvident counterclaim asserted in the case	0.10	34.00
06/18/24	Steph Morrill	Update Winkler pleadings and discovery chart with pertinent details from recent filings and status of projects and circulate same to team ahead of weekly team meeting; Conference with K.Hendricks and C.Spaulding regarding matter, project status updates, and upcoming assignments and filings;	0.20	35.00
06/18/24	Christian Spaulding	Meeting with S. Morrill and K. Hendricks regarding case status, updates, upcoming deadlines, and next steps.	0.20	63.75
06/24/24	Steph Morrill	Update Winkler pleadings and discovery chart with pertinent details from recent filings and status of projects and circulate same to team in email communication with bulleted summary of tasks;	0.30	52.50
			Total Hours:	1.10
			Total Amount:	\$ 237.75

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>
Kyle Ewing	0.10	400.00	40.00
Christian Spaulding	0.20	375.00	75.00
Steph Morrill	0.80	325.00	260.00
Totals:	1.10		\$ 375.00

Summary of Fees (Discounted Rates)

Timekeeper Name	Hours Billed	Average Discounted Rate	Total \$ Amount
Kyle Ewing	0.10	340.00	34.00
Christian Spaulding	0.20	318.75	63.75
Steph Morrill	0.80	175.00	140.00
Totals:	1.10		\$ 237.75

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

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kyle Ewing	14.10	400.00	5,640.00
Kara B. Hendricks	7.30	565.00	4,124.50
Christian Spaulding	5.10	375.00	1,912.50
Steph Morrill	4.70	325.00	1,527.50
Totals:	31.20		\$ 13,204.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Kyle Ewing	14.10	340.00	4,794.00
Kara B. Hendricks	7.30	480.25	3,505.83
Christian Spaulding	5.10	318.75	1,625.63
Steph Morrill	4.70	175.00	822.50
Totals:	31.20		\$ 10,747.96

Invoice No.: 1000709024
Re: Profit Connect Receivership
Matter No.: 209375.010200

Page 10

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
06/27/24	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00062924386 DATE: 6/29/2024 Trk'ing No. 1ZE0W1330499000746 / Worldwide Saver from Greenberg Traurig - Las Vegas Steph Morrill to Jonathan Brocksom Jonathan Brocksom on 6/27/2024 - 209375.010200	\$ 46.49
Total Expenses:		\$ 46.49

EXHIBIT 3

EXHIBIT 3

DECLARATION OF KYRA E. ANDRASSY

KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
KYLE A. EWING, ESQ.
Nevada Bar No. 14051
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: hendricksk@gtlaw.com
ewingk@gtlaw.com

KYRA E. ANDRASSY, ESQ.*
*Admitted Pro Hac Vice
RAINES FELDMAN LITRELL LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Telephone: (310) 440-4100
Facsimile: (949) 247-3998
Email: kandrassy@raineslaw.com

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

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**DECLARATION OF KYRA E.
ANDRASSY IN SUPPORT OF THE
TWELFTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM APRIL 1, 2024, THROUGH
JUNE 30, 2024**

I, Kyra E. Andrassy, Esq. declare as follows:

1. I am over 21 years old and am a partner with Raines Feldman Littrell LLP. I am licensed to practice in California and have been admitted pro hac vice for purposes of this case.

2. By virtue of my position with Raines Feldman Littrell (the "Firm"), I am competent to testify to the matters presented in this declaration, and I submit this declaration in support of the

1 Receiver's Twelfth Application for Allowance and Payment of Fees and Costs of the Receiver and
2 His Professionals for the Period from April 1, 2024, Through June 30, 2024 ("Twelfth
3 Application"), in connection with Profit Connect Wealth Services, Inc. This declaration is based
4 on my personal knowledge, except when made on information and belief, and as to those matters,
5 I believe them to be true.

6 3. Attached to this declaration is a true and correct copy of the invoice for the services
7 of the Firm for the period from April 1, 2024, through June 30, 2024 (the "Application Period").

8 4. In the ordinary course of the Firms' businesses, we keep a record of all time
9 expended by our professionals in the rendering of professional services on a computerized billing
10 system.

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

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

20 7. As reflected in the attached invoices, during the Application Period, the Firm
21 continued to negotiate resolutions with two credit card companies regarding constructive
22 fraudulent transfer claims against them. One of these has resulted in a settlement that is in the
23 process of being documented. The Firm also finalized the motion to allow claims, which was
24 granted by the Court. With claim allowance resolved, the Firm began work on a motion to make
25 an interim distribution. The Firm also revised the status report for the prior period and provided
26 input into the claims against Bank of America and the pending Texas litigation.

27 8. The Firm has agreed to discount its standard billing rates in connection with this
28 matter by 15 percent, and the fees being requested in this Application and the hourly rates on the

1 invoice reflect this reduction. The billing rate is based on the hourly rate in effect in 2021 when
2 this case was filed.

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

4 Executed on September 4, 2024.

5 /s/ Kyra E. Andrassy

6 KYRA E. ANDRASSY

7 Declarant
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EXHIBIT A

EXHIBIT A

RFL Invoices



1900 Avenue of the Stars, 19th Floor
 Los Angeles, CA 90067
 (310) 440-4100
 www.raineslaw.com
 Federal Tax ID: 20-4515337

Invoice Date: 7/16/2024
Invoice Number: 121953

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

2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102

7571-001 / Profit Connect Wealth Services, Inc.

Professional Services				Hours	Rate	Amount
05/09/2024	KEA	A01	Prepare recommendation to G. Winkler regarding Citibank	0.10	535.50	53.55
04/02/2024	KEA	D01	Prepare correspondence to counsel for Chase and Citibank re status of responses	0.10	535.50	53.55
04/03/2024	KEA	D01	Prepare follow up correspondence to Jim Ball regarding Bank of America and requesting confirmation he has been retained to handle the clawback action	0.10	535.50	53.55
04/08/2024	KEA	D01	Analysis of Citibank counteroffer and prepare recommendation to Receiver	0.20	535.50	107.10
04/09/2024	KEA	D01	Prepare counteroffer to Samuel Ehlers re Citibank	0.10	535.50	53.55
04/15/2024	KEA	D01	Prepare correspondence to C. Rivas regarding status of Chase response	0.10	535.50	53.55
04/15/2024	KEA	D01	Review and analysis of most recent counteroffer from Citibank	0.10	535.50	53.55
04/17/2024	KEA	D01	Meeting re status of potential litigation claims and strategy	0.40	535.50	214.20
04/23/2024	KEA	D01	Prepare correspondence to Chris Rivas, counsel for Chase, regarding status of response	0.10	535.50	53.55
04/23/2024	KEA	D01	Prepare recommendation to Receiver regarding Citibank; review response to same	0.20	535.50	107.10
04/23/2024	KEA	D01	Prepare counteroffer to Samuel Ehlers, counsel for Citibank	0.10	535.50	53.55

04/24/2024	KEA	D01	Telephone call with Samuel Ehlers regarding Citibank	0.20	535.50	107.10
05/01/2024	KEA	D01	Meeting regarding status of potential litigation claims and regarding claim hearing	0.40	535.50	214.20
05/09/2024	KEA	D01	Prepare Citibank tolling agreement and forward to counsel for Citibank	0.20	535.50	107.10
05/09/2024	KEA	D01	Telephone call with C. Rivas, counsel for Chase	0.20	535.50	107.10
05/13/2024	KEA	D01	Review signed tolling agreement re Citibank and forward to Samuel Ehlers	0.10	535.50	53.55
05/15/2024	KEA	D01	Meeting re distribution motion and reserves; status of clawback actions	0.50	535.50	267.75
05/15/2024	KEA	D01	Exchange of correspondence with Jim Ball regarding Bank of America status regarding credit card clawback action	0.10	535.50	53.55
05/21/2024	KEA	D01	Prepare counteroffer to counsel for Citibank	0.10	535.50	53.55
05/23/2024	KEA	D01	Exchange of correspondence with counsel for Citibank confirming settlement	0.10	535.50	53.55
05/23/2024	KEA	D01	Prepare correspondence to client re Citibank settlement	0.10	535.50	53.55
05/29/2024	KEA	D01	Analysis of pending clawback actions to determine likely recoveries for purposes of calculating amount to distribute on an interim basis	0.30	535.50	160.65
05/29/2024	KEA	D01	Meeting with team to coordinate efforts on clawback claims and Allianz settlement motion and strategize regarding BofA claims	0.40	535.50	214.20
06/17/2024	KEA	D01	Review and analysis of email from C. Rivas re Chase charges	0.10	535.50	53.55
06/24/2024	KEA	D01	Exchange of correspondence with C. Rivas re Amazon charges	0.10	535.50	53.55
<hr/>						
04/16/2024	KEA	D04	Review docket entry re hearing on claim motion and forward to Receiver	0.10	535.50	53.55
04/16/2024	KEA	D04	Revise 11th status report	0.30	535.50	160.65
04/29/2024	KEA	D04	Review and revise 11th status report	0.20	535.50	107.10
05/20/2024	KEA	D04	Prepare interim distribution motion	1.60	535.50	856.80
06/12/2024	KEA	D04	Meeting with J. McGraw regarding distribution motion	0.20	535.50	107.10
06/14/2024	KEA	D04	Prepare correspondence to Receiver regarding distribution method	0.10	535.50	53.55
06/20/2024	KEA	D04	Complete preparation of motion draft and declaration of G. Winkler	0.80	535.50	428.40
06/24/2024	KEA	D04	Review and analysis of rising tide comparison	0.40	535.50	214.20
06/26/2024	KEA	D04	Analysis of distribution method in advance of call	0.60	535.50	321.30

06/26/2024	KEA	D04	Team meeting to discuss distribution methods and Allianz litigation	0.50	535.50	267.75
04/03/2024	KEA	D05	Meeting with Receiver regarding process for serving claim allowance motion and regarding BofA issues	0.20	535.50	107.10
04/03/2024	KEA	D05	Prepare draft investor letter to accompany claim allowance motion	0.40	535.50	214.20
04/03/2024	KEA	D05	Revise motion to inform the Court of investor notification of claim number	0.20	535.50	107.10
04/03/2024	KEA	D05	Prepare correspondence to Receiver regarding draft investor letter	0.10	535.50	53.55
04/03/2024	KEA	D05	Review additional allegations regarding Bank of America	0.10	535.50	53.55
04/03/2024	KEA	D05	Exchange of correspondence with Receiver regarding service of claim allowance motion/letter to avoid unnecessary costs	0.20	535.50	107.10
04/08/2024	KEA	D05	Prepare claim allowance order	0.20	535.50	107.10
04/08/2024	KEA	D05	Revise Winkler declaration and motion prior to finalizing and filing same	0.50	535.50	267.75
04/08/2024	KEA	D05	Revise Winkler declaration to add testimony re additional claims	0.60	535.50	321.30
04/08/2024	KEA	D05	Further review and revise Winkler declaration based on email comments	0.20	535.50	107.10
04/09/2024	JF	D05	Drafted certificates of service; assembled final PDFs with coversheets for each exhibit; eFiled motion allowing and disallowing claims, declaration of receiver in support	0.70	0.00	No Charge
04/09/2024	KEA	D05	Finalize Winkler declaration and motion	0.30	535.50	160.65
04/10/2024	KEA	D05	Exchange of correspondence with Receiver regarding procedures for objecting to relief sought in the claim allowance motion	0.10	535.50	53.55
04/10/2024	KEA	D05	Prepare declaration regarding service of claim allowance/disallowance motion	0.20	535.50	107.10
05/01/2024	KEA	D05	Exchange of correspondence with Receiver's office with additional information regarding late-filed claim	0.10	535.50	53.55
05/06/2024	KEA	D05	Prepare nonopposition declaration to claim motion	0.10	535.50	53.55
05/13/2024	KEA	D05	Prepare for claim allowance hearing	0.70	535.50	374.85
05/13/2024	KEA	D05	Telephone appearance for claim allowance hearing	0.40	535.50	214.20
05/13/2024	KEA	D05	Revise order based on hearing and circulate same	0.10	535.50	53.55
05/14/2024	KEA	D05	Review entered order on claim allowance motion	0.10	535.50	53.55

05/30/2024	KEA	D05	Legal research re subordination	0.70	535.50	374.85
04/03/2024	KEA	D07	Prepare motion and declaration regarding employment of RFL (no charge)	0.00	0.00	No Charge
04/08/2024	KEA	D07	Finalize motion/order/declaration regarding RFL employment (no charge)	0.00	0.00	No Charge
04/01/2024	KEA	D10	Exchange of correspondence with special counsel re revised complaint	0.10	535.50	53.55
04/10/2024	KEA	D10	Review premediation demand to Allianz and exchange of correspondence with Receiver and team regarding same	0.10	535.50	53.55
04/23/2024	KEA	D10	Review and revise in pari delicto section of opposition to Dale Hayes' motion to dismiss	0.50	535.50	267.75
05/09/2024	KEA	D10	Review email from Texas counsel regarding contingency on potential settlement offer; prepare correspondence to client regarding same	0.10	535.50	53.55
05/09/2024	KEA	D10	Exchange of correspondence with K. Hendricks regarding BofA tolling agreement issue	0.10	535.50	53.55
05/23/2024	KEA	D10	Review Allianz settlement agreement and receivership order re	0.20	535.50	107.10
05/23/2024	KEA	D10	Prepare correspondence to special litigation claims re clawback claims re Bank of America	0.10	535.50	53.55
06/03/2024	KEA	D10	Exchange of correspondence with Marcelo Cortes regarding including credit card clawback claims in BofA tolling agreement/complaint	0.10	535.50	53.55
06/17/2024	KEA	D10	Analysis of bar order issue and revise motion accordingly	0.40	535.50	214.20
06/19/2024	KEA	D10	Finalize fee application and prepare order (no charge)	0.40	0.00	No Charge
06/19/2024	KEA	D10	Review and analysis of proposed revisions to settlement motion and comments to same	0.20	535.50	107.10
06/24/2024	KEA	D10	Review proposed additional language from Bank of America regarding Profit Connect and exchange of correspondence with counsel regarding same	0.10	535.50	53.55
06/27/2024	KEA	D10	Analysis of recent case law regarding Allianz issue	0.30	535.50	160.65
01/31/2024	KEA	D13	Prepare Andrassy declaration ISO fee application and narrative for inclusion in report (no charge) (Winkler/Profit Connect)	0.40	0.00	No Charge
05/06/2024	KEA	D13	Prepare fee application for first quarter 2024 (no charge)	1.20	0.00	No Charge

05/07/2024	KEA	D13	Prepare declarations ISO fee application (no charge)	1.10	0.00	No Charge
05/07/2024	KEA	D13	Revise application and declaration regarding Baker Tilly figure (no charge)	0.20	0.00	No Charge
05/09/2024	KEA	D13	Finalize fee application and circulate to SEC for review (no charge)	0.20	0.00	No Charge
06/20/2024	JF	D13	Prepared the final PDF for the Application for Receiver's Fees and His Professionals by assembling exhibits and drafting proofs of service; and E-filed the application	1.10	0.00	No Charge
06/24/2024	JF	D13	Calendared relevant hearings	0.10	0.00	No Charge

Sub-total Fees: \$9,157.05

Total Current Billing: **\$9,157.05**

Previous Balance Due: \$10,388.70

Total Now Due: \$19,545.75

Rate Summary

Kyra E. Andrassy	3.50 hours at \$0.00/hr	\$0.00
Kyra E. Andrassy	17.10 hours at \$535.50/hr	\$9,157.05
Ja'Nita Fisher	1.90 hours at \$0.00/hr	\$0.00
Total hours:	<u>22.50</u>	<u>\$9,157.05</u>

Payment Terms: Due Upon Receipt

Payment Options:

Pay Online:

Bill.com: <https://app.bill.com/p/rainesfeldmanllp>

Credit Card: <https://secure.lawpay.com/pages/rainesfeldman/operating>

Pay by Wire/ACH:

Wells Fargo Bank, N.A.

Routing No.: 121000248

Account No.: 4941981821

BIC/Swift Code: WFBIUS6S

Account Title: Raines Feldman Littrell LLP

Client Name & Invoice #

Pay by Check via Mail:

Raines Feldman Littrell LLP

PO Box 848574

Los Angeles, CA 90084-8574

EXHIBIT 4

EXHIBIT 4

DECLARATION OF ERICKA BROWNE

KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
KYLE A. EWING, ESQ.
Nevada Bar No. 14051
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: hendricksk@gtlaw.com
ewingk@gtlaw.com

KYRA E. ANDRASSY, ESQ.*
*Admitted Pro Hac Vice
RAINES FELDMAN LITRELL LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Telephone: (310) 440-4100
Facsimile: (949) 247-3998
Email: kandrassy@raineslaw.com

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

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**DECLARATION OF ERICKA
BROWNE IN SUPPORT THE
TWELFTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM APRIL 1, 2024, THROUGH
JUNE 30, 2024**

I, Ericka Browne, declare as follows:

1. I am over 21 years old and a Senior Director of Client Services at Technology Concepts & Design, Inc. ("TCDI").

2. By virtue of my position with TCDI, I am competent to testify to the matters presented in this declaration, and I submit this declaration in support of the Receiver's Twelfth

1 Application for Allowance and Payment of Fees and Costs of the Receiver and His Professionals
2 for the Period from April 1, 2024, Through June 30, 2024 (“Twelfth Application”), in connection
3 with Profit Connect Wealth Services, Inc. This declaration is based on my personal knowledge,
4 except where made on information and belief, and as to those matters, I believe them to be true.

5 3. Attached to this declaration is a true and correct copy of the invoices for the services
6 of my firm for the period from April 1, 2024, through June 30, 2024 (the “Application Period”).
7 TCDI acquired Stroz Friedberg's electronic discovery business prior to the Application Period and
8 will continue to provide those services pursuant to the contract previously signed by the Receiver
9 with Stroz Friedberg as it pertains to electronic discovery.

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

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

16 6. 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 7. 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 8. As reflected in the attached invoice, and pursuant to the Receivership Order
24 (ECF No. 26) and the Order Authorizing Employment of Computer Forensic Experts
25 (ECF No. 46), professionals at TCDI assisted the Receiver during the Application Period with
26 management of the electronic discovery database.

27 ...

28 ...

EXHIBIT A

EXHIBIT A

TCDI Invoices



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

Invoice

Page 1 of 1

Date 4/30/2024
TCDI Invoice # AFS-04-2024-VC1

Terms Net 90
Due Date 7/29/2024
Currency USD

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 April 2024 Professional Services

Billing Emails geoff@americanfiduciaryservices.com;
anna@americanfiduciaryservices.com

Item	Description	Qty	Units	Rate	Amount
Billable Time	Project Management	8	HR	195.00	1,560.00
User License(s)	User License(s)	1	User	85.00	85.00
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

Total USD **\$9,718.10**

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.



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

Invoice

Page 1 of 1

Date 5/31/2024
TCDI Invoice # AFS-05-2024-VC1

Terms Net 90
Due Date 8/29/2024
Currency USD

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 May 2024 Professional Services

Billing Emails geoff@americanfiduciaryservices.com;
anna@americanfiduciaryservices.com

Item	Description	Qty	Units	Rate	Amount
Billable Time	Project Management	1.5	HR	195.00	292.50
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

Total USD **\$8,365.60**

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.



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

Invoice

Page 1 of 1

Date 6/30/2024
TCDI Invoice # AFS-06-2024-VC1

Terms Net 90
Due Date 9/28/2024
Currency USD

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 June 2024 Professional Services

Billing Emails geoff@americanfiduciaryservices.com;
anna@americanfiduciaryservices.com

Item	Description	Qty	Units	Rate	Amount
Billable Time	Project Management	5	HR	195.00	975.00
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10
User License(s)	User License(s)	3	User	85.00	255.00

Total USD **\$9,303.10**

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.

EXHIBIT 5

EXHIBIT 5

DECLARATION OF STACY CHIANG

KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
KYLE A. EWING, ESQ.
Nevada Bar No. 14051
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: hendricksk@gtlaw.com
ewingk@gtlaw.com

KYRA E. ANDRASSY, ESQ.*
*Admitted Pro Hac Vice
RAINES FELDMAN LITRELL LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Telephone: (310) 440-4100
Facsimile: (949) 247-3998
Email: kandrassy@raineslaw.com

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

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**DECLARATION OF STACY CHIANG
IN SUPPORT THE TWELFTH
APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND
COSTS OF THE RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM APRIL 1, 2024, THROUGH
JUNE 30, 2024**

I, Stacy Chiang, declare as follows:

1. I am over 21 years old and a director with Baker Tilly US, LLP, in its forensics, litigation and valuation services practice.

2. By virtue of my position with Baker Tilly, I am competent to testify to the matters presented in this declaration, and I submit this declaration in support of the Receiver's Twelfth

Application for Allowance and Payment of Fees and Costs of the Receiver and His Professionals for the Period from April 1, 2024, Through June 30, 2024 ("Twelfth Application"), in connection with Profit Connect Wealth Services, Inc. This declaration is based on my personal knowledge, except where made on information and belief, and as to those matters, I believe them to be true.

3. Attached to this declaration is a true and correct copy of the invoices for the services of my firm for the period from April 1, 2024, through June 15, 2024 (the "Application Period"). This will be the final invoice from Baker Tilly in this matter as Baker Tilly is in the process of discontinuing its restructuring services, including receivership services.

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

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

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

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

8. During this Application Period, as reflected in the attached invoice, and pursuant to the Receivership Order (ECF No. 26) and the Order Authorizing Employment of Baker Tilly (ECF No. 76), Baker Tilly analyzed transaction data, provided tax planning services and guidance to the Receiver, and prepared and issued the receivership estate's 2023 tax returns.

...

...

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

/s/ Stacy Elledge Chiang

STACY ELLEDGE CHIANG

Declarant

EXHIBIT A

EXHIBIT A

BT Invoices

Baker Tilly Advisory Group, LP
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: June 24, 2024

Invoice Number: BT2840292

Client Number: 242674

INVOICE

AMOUNT

<p>Fees</p> <p>SEC v Profit Connect, et al.</p> <p>Professional services rendered as accountants to the Receiver and receivership estate from April 1, 2024 through June 15, 2024, including ongoing evaluation and analysis of tax issues for the case, development of tax accounting for 2023 and preparation and finalization of 2023 receivership estate tax returns (see attached details).</p>	<p>\$5,623.00</p>
<p>Fees Total:</p> <p>Expenses Total:</p>	<p>\$5,623.00</p> <p>\$46.00</p>
<p>Invoice Total:</p>	<p>\$5,669.00</p>

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

Balance is payable upon receipt or previously agreed upon terms.

Please visit www.bakertilly.com/payment to pay by Credit Card, Debit Card, Crypto, or EFT using your Checking Account. There is 3% surcharge on all Credit Card payments, and a 1.5% exchange fee on all Crypto payments. There is no fee for Debit Card or EFT payments.

<p>Please ACH or wire payment to:</p> <p>US Bank, Milwaukee, WI Routing No: 075000022 Account No: 312220280 Reference #: BT2840292</p>	<p>Or send payment to:</p> <p>Baker Tilly Advisory Group, LP PO Box 511563 Los Angeles, CA 90051-8118</p>	<p>Reference:</p> <p>Client Number: 242674 Invoice Number: BT2840292 Amount Enclosed: \$_____</p>
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SEC v. Profit Connect, et al.

Services rendered from April 1, 2024 through June 15, 2024



Date	Professional	Category	Detail	Hours	Rate	Amount
04/04/24	Chiang, S	Tax Analysis	Email Receiver's office to request information for 2023 tax analysis/returns and further request re overall case status/treatment on returns.	0.20	\$ 395.00	\$ 79.00
04/12/24	Chiang, S	Tax Analysis	Review and attention to planning for tax analysis and returns.	0.30	\$ 395.00	\$ 118.50
04/12/24	Calvillo, N	Tax Analysis	Review available status reports and information for tax analysis and update S Chiang.	0.60	\$ 225.00	\$ 135.00
04/29/24	Chiang, S	Tax Analysis	Review analysis developed to date and strategize re reporting.	0.30	\$ 395.00	\$ 118.50
05/07/24	Chiang, S	Tax Analysis	Correspondence with counsel (.10) and overall case planning (.10) for upcoming deadlines.	0.20	\$ 395.00	\$ 79.00
05/08/24	Chiang, S	Tax Analysis	Review open issues for accounting (.20) and correspond with Receiver's office re information needed (.10).	0.30	\$ 395.00	\$ 118.50
05/09/24	Calvillo, N	Tax Analysis	Continue to prepare 2023 analysis of transactions with new information provided by Receiver.	1.50	\$ 225.00	\$ 337.50
05/09/24	Castle, E	Tax Analysis	Review and analysis of 2023 transactions and identify additional information needed (1.40); develop request and correspond with client (.30).	1.70	\$ 360.00	\$ 612.00
05/10/24	Calvillo, N	Tax Preparation	Review Form 1 for asset information and begin to prepare summary of recoveries and sales transactions for tax preparation.	2.40	\$ 225.00	\$ 540.00
05/10/24	Castle, E	Tax Preparation	Review sale transactions comparing to summary and update workpapers with additional information obtained (.70); correspond with client (.20).	0.90	\$ 360.00	\$ 324.00
05/13/24	Castle, E	Tax Preparation	Continue to review asset recovery reporting issues, including review of orders and reporting in court filings, identifying additional inquiries for client (2.10); update workpapers for tax preparation (.70).	2.80	\$ 360.00	\$ 1,008.00
05/13/24	Chiang, S	Tax Preparation	Review progress/issues and work with team on accounting (.30). Correspond with Receiver's office (.20).	0.50	\$ 395.00	\$ 197.50
05/14/24	Chiang, S	Tax Preparation	Review inquiry from Receiver's office for overall tax compliance planning, impact on case for potential tax, etc, and research/respond.	0.30	\$ 395.00	\$ 118.50
05/15/24	Curl, M	Tax Preparation	Prepare return and subsidiary schedules and forms.	3.40	\$ 175.00	\$ 595.00
05/16/24	Castle, E	Tax Preparation	Review return drafts and identify updates/corrections needed.	1.30	\$ 360.00	\$ 468.00
05/17/24	Curl, M	Tax Preparation	Update returns for manager comments.	0.50	\$ 175.00	\$ 87.50
05/21/24	Castle, E	Tax Preparation	Review/finalize and sign returns.	0.70	\$ 360.00	\$ 252.00
05/21/24	Chiang, S	Tax Preparation	Review returns package and sign instructions/approve for filing.	0.80	\$ 395.00	\$ 316.00
06/05/24	Chiang, S	Tax Analysis	Review inquiry from Receiver's team re claims distribution planning, tax estimates/planning and research/respond.	0.30	\$ 395.00	\$ 118.50
Total Professional Fees				19.00		\$ 5,623.00
Expenses						
05/31/24			Federal Express			\$ 46.00
Total Expenses						\$ 46.00
Total Professional Services and Expenses						\$ 5,669.00

Professional	Title	Hours	Rate	Amount
Mandy Curl	Associate	3.90	\$ 175.00	\$ 682.50
Nicole Calvillo	Manager	4.50	\$ 225.00	\$ 1,012.50
Eileen Castle, CPA, CFE, CIRA	Senior Manager	7.40	\$ 360.00	\$ 2,664.00
Stacy Elledge Chiang, CPA/CFF, CIRA	Director	3.20	\$ 395.00	\$ 1,264.00
		19.00	\$ 295.95	\$ 5,623.00

Category	Description	Hours	Rate	Amount
Tax Analysis	Tax research, analysis and planning.	5.40	\$ 317.87	\$ 1,716.50
Tax Preparation	Preparation and issuance of 2023 tax accounting and tax returns, disclosures and attachments.	13.60	\$ 287.24	\$ 3,906.50
		19.00	\$ 295.95	\$ 5,623.00

EXHIBIT 6

EXHIBIT 6

PROPOSED ORDER

KARA B. HENDRICKS, ESQ.
Nevada Bar No. 07743
KYLE A. EWING, ESQ.
Nevada Bar No. 14051
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KYRA E. ANDRASSY, ESQ.*
*Admitted Pro Hac Vice
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3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
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Email: kandrassy@raineslaw.com

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

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

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

Defendants

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

**[PROPOSED] ORDER GRANTING
THE TWELFTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE
PERIOD FROM APRIL 1, 2024,
THROUGH JUNE 30, 2024**

The Court having reviewed the *Twelfth Application for Allowance and Payment of Fees and Costs of the Receiver and His Professionals for the Period from April 1, 2024, Through June 31, 2024* (the “Application”) and there being no opposition to the Application and the Court having found that cause exists to grant the Application,
...

IT IS ORDERED AS FOLLOWS:

- (1) The Application is approved;
- (2) Geoff Winkler (the “Receiver”) and American Fiduciary Services are allowed \$51,651.50 in fees and \$3,726.85 in costs;
- (3) Greenberg Traurig is allowed \$21,475.24 in fees and \$46.49 in costs;
- (4) Raines Feldman Littrell LLP is allowed \$9,157.05 in fees;
- (5) Technology Concepts & Design, Inc. is allowed \$27,386.80 in costs;
- (6) Baker Tilly is allowed fees of \$5,669.00 in costs; and
- (7) The Receiver is authorized to pay 80% of the allowed fees and 100% of the allowed costs from funds on hand in the receivership estate.

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

Dated this _____ day of _____, 2024.