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

11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

19 Defendants.

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

**APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
OF THE RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM AUGUST 7, 2021, THROUGH
SEPTEMBER 30, 2021**

[HEARING REQUESTED]¹

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23 Geoff Winkler of American Fiduciary Services, LLC, the permanent receiver
24 (the "Receiver") over Profit Connect Wealth Services, Inc., and any subsidiaries and
25 affiliates (together, "Profit Connect") pursuant to an order entered on August 6, 2021
26 (the "Receiver Order"), submits this application for allowance and payment of his fees

27 _____
28 ¹ The Receiver requests that the Court schedule a hearing on this application at the
same date and time as the hearing on the Receiver's status report, which is being
filed on or about November 1, 2021.

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1 and costs and the fees and costs of the professionals he employed to assist him in
2 fulfilling his duties under the Receiver Order. The period of time covered by this
3 Application is from August 7, 2021, through September 30, 2021 (the "Application
4 Period"). The Receiver is informed that the Securities & Exchange Commission
5 ("SEC") has no objection to the relief sought in this Application.

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 Because the Receiver is not a licensed attorney, does not have in-house counsel,
8 and is not a computer expert, he employed professionals to assist him in fulfilling his
9 duties as the Receiver. Specifically, pursuant to Section X.G. of the Receiver Order,
10 he retained Smiley Wang-Ekvall, LLP, and Ballard Spahr, LLP, as counsel and Stroz
11 Friedberg as his computer forensic experts. The Court approved their employment
12 by order entered on September 21, 2021. Pursuant to this Application, the Receiver
13 and his professionals seek approval of the following fees and costs: (1) \$285,822.90
14 in fees and \$20,338.33 costs for the Receiver; (2) \$27,022.77 in fees and \$1,408.89 in
15 costs for Ballard Spahr, LLP; (3) \$7,434.95 in fees and \$1,527.37 in costs for Smiley
16 Wang-Ekvall, LLP; and (4) \$95,392.50 in fees and \$22,864.80 in costs for Stroz
17 Friedberg. The Receiver seeks authority to pay 80% of the fees on an interim basis
18 and 100% of the costs.

19 This Application is based on the below written argument, the declarations of
20 Geoff Winkler, Maria A. Gall, Esq., Kyra E. Andrassy, Esq., and Sergio Kopelev, all
21 papers on file, and any argument the Court may call and consider.

22 **I. RELEVANT BACKGROUND AND PROCEDURAL HISTORY**

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

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

7 The Receiver has ceased all business operations after spending a fairly
8 significant amount of time in the early days of the receivership making sure that
9 there was no viable business to continue operating. During the Application Period,
10 the Receiver has been focused on securing all of the assets, inventorying them, and
11 devising a strategy to liquidate them in a manner that will maximize the return
12 realized for each asset for the receivership estate. The Receiver has identified
13 potential claims that belong to the receivership estate by gathering information,
14 issuing subpoenas, and reviewing books and records. This process has been made
15 significantly more efficient as a result of the efforts of Stroz Friedberg to provide
16 access to the books and records and documents electronically and in a searchable
17 database. The costs associated with these efforts at the beginning of the case, when
18 the documents are being gathered, will ultimately result in lower attorney's fees
19 because significantly less time will be spent reviewing documents that may or may
20 not have any relevance because counsel can instead conduct searches that yield
21 responsive documents. The efforts of the Receiver and his team during the
22 Application Period will pave the way for additional recoveries to be obtained by the
23 estate. Counsel have carefully coordinated their efforts to avoid duplication of
24 services.

25 On August 24, 2021, which was the last time the Receiver reported to the Court
26 in a pleading, the Receiver was holding approximately \$7.525 million in cash and
27 cryptocurrency. As of the date of this Application, the Receiver is holding
28 approximately \$8.239 million in cash and is preparing to sell real property and to

1 auction personal property in the next quarter. As set forth in the motion to approve
2 the employment of the professionals and because receivership work is a form of public
3 service, each of the professionals has agreed to discount their typical hourly rate by
4 15%, and this discount is reflected in the fees being sought in this Application.

5 **II. LEGAL AUTHORITY**

6 “The power of a district court to impose a receivership ... derives from the
7 inherent power of a court of equity to fashion effective relief.”² “The primary purpose
8 of equity receiverships is to promote orderly and efficient administration of the
9 Receivership Estate by the district court for the benefit of creditors.”³ “[T]he practice
10 in administering an estate by a receiver ... must accord with the historical practice
11 in federal courts or with a local rule.”⁴

12 As the Ninth Circuit explained:

13 A district court’s power to supervise an equity receivership
14 and to determine the appropriate action to be taken in the
15 administration of the receivership is extremely broad. The
16 district court has broad powers and wide discretion to
17 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.⁵

18 Decisions regarding the timing and amount of an award of fees and expenses to
19 the Receiver and his or her professionals are committed to the sound discretion of the
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22 _____
23 ² *SEC v. Wencke*, 622 F.2d 1363, 1369 (9th Cir. 1980).

24 ³ *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986.)

25 ⁴ Fed. R. Civ. P. 66.

26 ⁵ *SEC v. Capital Consultants, LLC*, 397 F.3d 733, 738 (9th Cir. 2005) (citations
27 omitted); *see also CFTC v. Topworth Int’l, Ltd.*, 205 F.3d 1107, 1115 (9th Cir. 1999)
28 (“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.”).

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1 Court.⁶ In determining the reasonableness of fees and expenses requested in this
 2 context, the Court should consider the time records presented, the quality of the work
 3 performed, the complexity of the problems faced, and the benefit of the services
 4 rendered to the Estate, along with the Commission's position on the request, which
 5 is entitled to "great weight."⁷

6 III. THE FEES AND COSTS BEING REQUESTED

7 The Receiver's fees and those of his legal professionals have been necessitated,
 8 in no small part, by the nature of the entity in receivership. Specifically, Profit
 9 Connect had no books and records, including books of account. It had no functioning
 10 accounting department, including no person properly handling accounts receivables
 11 and payables. The Receiver has had to recreate, and is still in the process of
 12 recreating, accounting records by reconstructing the entity's financials using
 13 financial statements and offsetting financial records. The majority of these
 14 statements and records have had to be procured through subpoenas served on
 15 financial institutions. The subpoenas have necessitated work from the legal
 16 professionals, both in terms of issuing the subpoenas, but also in terms of negotiation
 17 and enforcement.

18 In addition, the Receiver has experienced a substantial amount of opposition
 19 in connection with third-party compliance with the Receivership Order. For instance,
 20 although the Receivership Order expressly permits the receiver to take control of
 21 Profit Connect's accounts, mails, and assets, a number of third party custodians
 22 refused to turn over access because the assets they controlled were not specifically
 23 identified in the Order. The Receiver and/or his counsel had to negotiate access with
 24 nearly every third party, including financial institutions and utility providers. And,
 25 as the docket of this matter reflects, certain third parties would not provide access

26 _____
 27 ⁶ 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)).

28 ⁷ *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973).

1 until an order specifically identifying the property at issue was entered by the Court
2 (see, e.g., ECF Nos. 31, 33).

3 Also, despite the Receivership Order and the principles underlying a federal
4 equity receivership, the Receiver has discovered that investors have initiated
5 lawsuits outside the receivership in an effort to recoup their investments ahead of
6 other investors. The Receiver is presently aware of a putative class action that is
7 being formed by one certain set of investors and counsel. The Receiver is also aware
8 of at least one action by an investor against a Profit Connect agent pending in another
9 jurisdiction. The Receiver and his counsel have had to engage with counsel in these
10 anticipated and pending lawsuits in order to preserve the assets of the receivership
11 estate.

12 The foregoing highlights some of the actions the Receiver and his legal
13 professionals have been constrained to undertake early in this case and which drives
14 their fees. That said, the Receiver's prompt action in reconstructing Profit Connect's
15 financial records has assisted in his preservation and marshalling of Profit Connect
16 property, including over \$4 million dollars in cryptocurrency. As set forth in the
17 Receiver's motion to auction and otherwise liquidate Profit Connect's property, the
18 Receiver is prepared to sell a significant portion of real and personal property early
19 in the receivership, thereby reducing expenses of the receivership estate.

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

23 **a. The Receiver**

24 [Fees of \$285,822.90 and costs of \$20,338.33]

25 Pursuant to paragraph X of the Receiver Order, the Receiver was empowered
26 and tasked with a broad range of authority, including the authority to take possession
27 and control of all assets, to assume full control of Profit Connect, to have control of
28 and be added as the sole authorized signatory for all accounts, to conduct an

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1 investigation and discovery necessary to locate and account for assets, to assess the
2 viability and profitability of Profit Connect, to take action necessary to preserve and
3 prevent the disposition, concealment, or dissipation of assets, to employ professionals,
4 to make an accounting, to make payments and disbursements, to investigate and
5 prosecute claims, to engage in litigation to preserve or recover assets or to carry out
6 the Receiver's mandate, and to have access to all mail and electronic mail.

7 Pursuant to the Receiver Order, the Receiver and his team performed the
8 following duties:

9 Upon arrival, the Receiver and his team observed operations, meeting with
10 Brent Kovar and Joy Kovar, and interviewing employees. The Receiver, his team, and
11 the Forensic IT team collected data, digitized paper files, documented operations, and
12 investigated the Profit Connect systems and technology. The Receiver held staff
13 meetings, coordinated communication, including setting up and managing a website,
14 for investors and agents, and met with outside vendors including CPA's and utility
15 companies. During the Receivers time onsite, him and his team had to navigate a
16 Covid19 outbreak amongst the Profit Connect employees, coordinating and tracking
17 communication to ensure everyone's safety. Profit Connect did not have a business
18 plan so the Receiver requested one. Upon the extensive review of the plant hat was
19 created and discussions with Brent Kovar and Profit Connect employees,
20 observations of operations, and review of data and information collected, the Receiver
21 determined the business was not viable and took steps to protect investor funds,
22 immediately. The Receiver terminated employees, shut down locations, closed and
23 terminated a lease for one location, and moved all the assets from two locations to the
24 warehouse. All assets were documented, and a thorough inventory database was
25 created. Orders for side by sides and sea doos were canceled and the valuation of
26 assets was initiated. Proposals to liquidate assets and cryptocurrency were requested
27 and reviewed. The Receiver and his team forwarded all mail to their office and took
28 possession of bank accounts, records, and vendor policies. The Receiver hosted a

1 conference call for all interested parties and continued to manage emails and
2 incoming calls.

3 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	281.2	\$340.00	95,608.00
John Hall	Accountant	211.2	\$310.00	65,472.00
Michelle Priddy	Director	146.6	\$289.00	42,367.40
Renee Dieffenderfer	Associate	146.1	\$255.00	37,255.50
Josh McGraw	Associate	158.0	\$255.00	40,290.00
Ysabel Willits	Analyst	32.2	\$150.00	4,830.00
<i>Total</i>		<i>975.3</i>		<i>285,822.90</i>

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

26 AFS's rates include a 15 percent discount off its already discounted hourly
27 rates for government matters and will not increase for the pendency of the case. Both
28

1 the standard regulatory rate and the discounted regulatory rate reflect a significant
2 discount off our standard consulting rates.

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

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

<i>Category</i>	<i>Total Cost</i>
Airfare	\$4,346.83
Transportation	\$1,433.83
Lodging	\$9,287.71
Meals	\$3,111.00
Technology	\$1,453.58
Shipping	\$543.01
Other	\$58.37
COVID Testing	\$104.00
<i>Total</i>	<i>\$20,338.33</i>

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

26 The Standardized Fund Accounting Report, AFS's invoice, and its billing
27 entries are included with the Declaration of Geoff Winkler attached as Exhibit 1.
28

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1 **b. Ballard Spahr**

2 [Fees of \$27,022.77 and costs of \$1,408.89]

3 During the Application Period, attorneys at Ballard Spahr LLP performed
4 services on multiple projects. Their work included, among other things: (1) issuing
5 and enforcing subpoenas to various entities in an effort to track, trace, and recover
6 Profit Connect assets; (2) liaising and negotiating with counsel for third party
7 custodians of Profit Connect assets to ensure such assets were properly transferred
8 to the Receiver's control; (3) investigating, analyzing, and drafting necessary
9 documents to ensure Profit Connect property was properly preserved for transfer to
10 the Receiver; (4) liaising and negotiating with counsel for investors on their putative
11 class actions and other litigation to recoup monies outside the receivership; and (5)
12 ensuring that Profit Connect employees were properly terminated in connection with
13 the cessation of business operations and that their employee benefits were properly
14 addressed.

15 During the Application Period, the Receiver's primary counsel from Ballard
16 Spahr billed 46.3 hours at a standard rate of \$495.00/hour for a total of \$22,918.50.
17 Where appropriate, she leveraged work to a third-year associate, Andrew Clark, who
18 billed 14.30 hours at a standard rate of \$315.00/hour for a total of \$4,504.50. (Mr.
19 Clark did not join Ballard Spahr until after this federal clerkship ended in September
20 2021; otherwise, he would have been leveraged additional work.) In addition, partner
21 Edward Leeds billed 1.9 hours at \$795.00/hour for a total of \$1,510.50 to advise on
22 employee benefit matters, which is in Mr. Leeds's area of expertise; where
23 appropriate, Mr. Leeds leveraged work to an associate in his practice group, G'Nece
24 Jones, who billed 5.2 hours at \$455.00/hour for a total of \$2,366.00. Finally, of counsel
25 Diane Market billed 1.20 hours at \$410.00/hour for a total of \$492.00 to advise on real
26 estate matters, which is in Ms. Markert's area of expertise.

27 Ballard Spahr's invoices are included with the Declaration of Maria Gall
28 attached as Exhibit 2.

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1 **c. Smiley Wang-Ekval**

2 [Fees of \$7,434.95 and costs of \$1,527.37]

3 During the Application Period, Smiley Wang-Ekval assisted the Receiver with
4 compliance with 28 U.S.C. § 754, which requires a receiver in any civil action that
5 involves real or personal property to file copies of the complaint and the receivership
6 order in the district court for each district in which property is or may be located so
7 that the Receiver has jurisdiction and control over that property. The Receiver
8 recorded these notices in ten different districts where property may be located in
9 order to ensure jurisdiction over this property. Smiley Wang-Ekval also prepared
10 and obtained approval of a stipulation with GoDaddy authorizing redirection of the
11 Profit Connect website. The firm has also assisted the Receiver in communications
12 with investors, and incurred 6.80 hours and \$3,641.40 in the case administration
13 category.

14 Smiley Wang-Ekval has also analyzed and identified potential assets and
15 claims and worked with the Receiver and his team to devise strategies for recovering
16 value. The firm incurred 5.90 hours and \$3,097.40 in fees in asset analysis and
17 recovery.

18 Smiley Wang-Ekval is also preparing the motion to employ an auctioneer and
19 to authorize the Receiver to sell personal property via an auction, so during this
20 Application Period, incurred 0.70 hours and \$374.85 in fees getting information for
21 this motion and then beginning to prepare it.

22 Smiley Wang-Ekval incurred a small amount of fees preparing the portions of
23 the motion to authorize the Receiver to employ professionals that pertained to the
24 firm.

25 Smiley Wang-Ekval prepared the fee application for the period of time covered
26 by the temporary receivership. The application was approved by the Court.
27 Pursuant to the SEC Billing Guidelines, the firm has not charged for this work.
28

1 The Receiver's primary counsel from Smiley Wang-Ekvall billed \$7,389.90 in
2 fees and Janet Hogan, a paralegal, billed \$45.05 in fees. These fees reflect a 15%
3 discount off of the standard hourly rates.

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

6 **d. Stroz Friedberg**

7 [Fees of \$95,392.50 and costs of \$22,864.80]

8 During the Application Period, staff from Stroz Friedberg (an Aon company)
9 assisted the receiver with understanding, quantifying and collecting data from
10 various Profit Connect IT systems. This work included, among other things: (1)
11 continuing to inventory digital devices used by Profit Connect principals and
12 employees; (2) continuing to gain access to and export financial data for Profit
13 Connect; (3) continuing to perform forensic collection of data from various digital
14 devices; (4) continuing to export data from various digital devices; (5) continuing to
15 process and host data exported from various digital devices; (6) continuing to perform
16 searches of hosted data; (7) and continuing to assist with Profit Connect employee
17 interviews. The receiver's primary consultant from Stroz Friedberg billed 14.75
18 hours; in addition, Allan Vogel billed 75.45 hours, and Jishnu Pradeep billed 91.5
19 hours to assist the primary consultant with forensic tasks outlined above at a
20 discounted rate of \$525 per hour for a total of \$95,392.50 dollars. Finally, Stroz
21 Friedberg billed \$12,113.70 for processing, hosting and user licenses of data collected
22 from Profit Connect in the Relativity Electronic Discovery application, and
23 \$10,751.10 in various expenses. These rates and accompanying invoices already
24 include discounts from Stroz Friedberg standard rates.

25 Stroz Friedberg's invoices are attached to the Declaration of Sergio Kopelev
26 attached as Exhibit 4.

27 The Receiver anticipates a steep decline in fees and costs associated with the
28 work performed by Stroz Friedberg as their part of the case is largely wrapped up.

1 IV. CONCLUSION

2 Based on the foregoing and pursuant to Section X.G. of the Receiver Order, the
3 Receiver and his professionals request entry of an order:⁸

4 (1) Allowing the Receiver \$285,822.90 in fees and \$20,338.33 in costs for the
5 Application Period;

6 (2) Allowing Ballard Spahr \$27,022.77 in fees and \$ 1,408.89 in costs for the
7 Application Period;

8 (3) Allowing Smiley Wang-Ekvall, LLP \$7,434.95 in fees and \$1,527.37 in
9 costs for the Application Period;

10 (4) Allowing Stroz Friedberg \$95,392.50 in fees and \$22,864.80 in costs for
11 the Application Period;

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

14 (6) Granting such other and further relief as the Court deems just and
15 appropriate.

16 Dated: November 1, 2021

17 SMILEY WANG-EKVALL, LLP

18 By: /s/ Kyra E. Andrassy
19 Kyra E. Andrassy, Esq.
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21 -and-

22 Maria A. Gall, Esq.
23 Nevada Bar No. 14200
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25 *Attorneys for Receiver*

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28 ⁸ The form of the order is attached as Exhibit 5.

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EXHIBIT "1"

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Geoff Winkler of American Fiduciary Services

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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF GEOFF WINKLER
IN SUPPORT OF APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM AUGUST 7, 2021, THROUGH
SEPTEMBER 30, 2021**

21
22 I, Geoff Winkler, declare as follows:

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

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

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

3 3. On August 6, 2021, on stipulation of the parties, the Court appointed me
4 as the permanent receiver of Profit Connect Wealth Services, Inc. and any of its
5 subsidiaries and affiliates (“Profit Connect”). This fee application covers the period
6 from August 7, 2021, through September 30, 2021 (the “Application Period.”)

7 4. Attached to this declaration is a true and correct copy of the invoice for
8 my services and the services of my team at AFS for the Application Period.

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

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

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

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

26 9. As reflected in the attached invoice, pursuant to the Receivership Order,
27 my team and I performed the following duties during the Application Period:
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- a. observed operations, met with Brent Kovar and Joy Kovar, and interviewed employees;
- b. together with the forensic IT team, collected data, digitized paper files, documented operations, and investigated Profit Connect systems and technology;
- c. held staff meetings, coordinated communication, including setting up and managing a website, for investors and agents, and met with outside vendors, including CPAs and utility companies;
- d. navigated a Covid-19 outbreak amongst the Profit Connect employees, coordinating and tracking communication to ensure everyone’s safety;
- e. requested the formulation of a business plan, and upon extensive review of the plan that was created, held discussions with Brent Kovar and Profit Connect employees, observed operations, and reviewed data and information collected;
- f. determined the business was not viable and took steps to protect investor funds, immediately;
- g. terminated employees, shut down locations, closed and terminated a lease for one location, and moved all assets from two locations to the Profit Connect warehouse;
- h. documented all assets and created a thorough inventory database;
- i. immediately began marshalling and preserving assets, including by cancelling orders for side by sides and sea doos;
- j. initiated the valuation of assets;
- k. solicited, reviewed, and analyzed proposals to liquidate assets and cryptocurrency;
- l. took possession of bank accounts, records, and vendor policies;

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

1 m. hosted a conference call for all interested parties, including investors;
2 and

3 n. continued to manage emails and incoming calls.

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

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

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

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

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

27 15. As of the date of this declaration, I am holding approximately
28 \$8,238,268.74 in cash belonging to Profit Connect.

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

Executed on November 1, 2021.

/s/ Geoff Winkler

SMILEY WANG-EKVALL, LLP
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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 08/06/2021 to 09/30/2021

FUND ACCOUNTING (See instructions)				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 08/06/2021):	-		
	Increases in Fund Balance:			
Line 2	Business Income	92,247.78		
Line 3	Cash and Securities (in transit)	4,508,948.71		
Line 4	Interest/Dividend Income	-		
Line 5	Business Asset Liquidation	-		
Line 6	Personal Asset Liquidation	136,180.07		
Line 7	Third-Party Litigation Income	-		
Line 8	Miscellaneous - Other	-		
	Total Funds Available (Lines 1 - 8):		4,737,376.56	4,737,376.56
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	(284,788.64)		
Line 10b	Business Asset Expenses	(230,495.82)		
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		(515,284.46)	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments		-	
	Total Disbursements for Receivership Operations			(515,284.46)
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):			(515,284.46)
Line 13	Ending Balance (As of 09/30/2021):			4,222,092.10
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		4,222,092.10	
Line 14b	Investments		4,069,948.66	
Line 14c	Other Assets or Uncleared Funds		10,900,000.00	
	Total Ending Balance of Fund - Net Assets			19,192,040.76

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 08/06/2021 to 09/30/2021

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

Receiver: Geoff Winkler

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

Date: October 29, 2021

American Fiduciary Services

715 NW Hoyt Street #4364
 Portand, OR 97208-4364

Invoice

Date	Invoice #
9/30/2021	21-37

Bill To
Geoff Winkler, Receiver FBO Profit Connect et al, NV 89115

P.O. No.	Terms	Project
PC2021	Due on receipt	

Quantity	Description	Rate	Amount
	FIDUCIARY AND INSOLVENCY SERVICES		
281.2	Geoff Winkler, Receiver	340.00	95,608.00
211.2	John Hall, Accountant	310.00	65,472.00
146.6	Michelle Priddy, Director	289.00	42,367.40
158	Josh McGraw, Associate	255.00	40,290.00
146.1	Renee Dieffenderfer, Associate	255.00	37,255.50
32.2	Ysabel Willits, Analyst	150.00	4,830.00
	Total Fiduciary and Insolvency Services		285,822.90
	REIMBURSABLE EXPENSES		
	Airfare		
	GBW Airfare 8/22-8/27, 8/29-9/3, 9/27-9/30	1,451.23	1,451.23
	JBH Airfare 9/27-9/30, 8/8-8/13	1,131.40	1,131.40
	RLD Airfare 8/22-8/27	415.80	415.80
	JPM 8/22-8/27	455.80	455.80
	MAP Airfare 8/22-8/27, 8/8-8/13	892.60	892.60
	Airfare Subtotal		4,346.83
	Car Rental, Taxi, Parking and Gas		
	8/8-8/13 JBH GBW MAP	834.76	834.76
	8/29-9/3 GBW	100.00	100.00
	9/27-9/30 GBW JBH	50.24	50.24
	8/22-8/27 GBW JPM RLD MAP	448.83	448.83
	Car Rental, Taxi, Parking and Gas Subtotal		1,433.83
	Hotel		
	JBH 9/27-9/30, 8/8-8/13	1,849.51	1,849.51
	GBW 8/8-8/13, 8/22-8/27, 8/29-9/3, 9/27-9/30	3,420.03	3,420.03
	RLD 8/22-8/27	918.37	918.37
	JPM 8/22-8/27	918.37	918.37
	MAP 8/22-8/27, 8/8-8/13	2,181.43	2,181.43
		Total	

American Fiduciary Services

715 NW Hoyt Street #4364
 Portand, OR 97208-4364

Invoice

Date	Invoice #
9/30/2021	21-37

Bill To
Geoff Winkler, Receiver FBO Profit Connect et al, NV 89115

P.O. No.	Terms	Project
PC2021	Due on receipt	

Quantity	Description	Rate	Amount
	Hotel Subtotal		9,287.71
	Meals & Incidentals Per Diem		
36	Full Days of Field Work	61.00	2,196.00
20	First & Last Travel Days of Field Work	45.75	915.00
	Meals & Incidentals Per Diem Subtotal		3,111.00
	GoDaddy Hosting Fees	253.58	253.58
	COVID Tests	104.00	104.00
	Postage and Shipping	543.01	543.01
	Packing Supplies	58.37	58.37
	ADT Installation for Warehouse	1,200.00	1,200.00
	Total Reimbursable Expenses	0.00	20,338.33
		Total	\$306,161.23

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
August 6, 2021 - September 30, 2021
(Sorted in Chronological Order by Activity Category)

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Renee Diefenderfer	Text communication with PC employee	8/7/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Text communication with investor	8/7/2021	0.1	255.00	25.50	Legal - Case Administration
John Hall	Analysis and formatting of excel outputs	8/8/2021	2.9	310.00	899.00	Financial - Forensic Accounting
Geoff Winkler	Prepare for upcoming meetings, review emails and notes, schedule tasks, discussion with team	8/8/2021	2.1	340.00	714.00	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/9/2021	10.3	289.00	2,976.70	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting onsite with defendants, employees, review business operations, calls with vendors, meeting with team	8/9/2021	10.3	340.00	3,502.00	Legal - Case Administration
John Hall	Onsite in LVNV, meet with defendant and employees, meeting with team, business operations and analysis in preparation for accounting	8/9/2021	10.3	310.00	3,193.00	Legal - Case Administration
Renee Diefenderfer	Draft and sent letter to PC employee	8/9/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email update to GBW and JBH regarding covid status by employee	8/9/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Scan remaining employee interview docs onto AFS drive	8/9/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Meeting with GBW, JBH, and YKW regarding case next steps	8/9/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Investor communication and call scheduling	8/9/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Organizing files received on shared drive	8/9/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Employee communication (company all and one offs)	8/9/2021	0.7	255.00	178.50	Legal - Case Administration
Renee Diefenderfer	Data entry and employee communication	8/9/2021	1.0	255.00	255.00	Legal - Case Administration
Ysabel Willits	Email correspondence with CPA	8/9/2021	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Updating case files of investor correspondence	8/9/2021	0.3	150.00	45.00	Legal - Case Administration
Ysabel Willits	Call and email correspondence with CPA	8/9/2021	0.2	150.00	30.00	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	8/9/2021	1.3	150.00	195.00	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/10/2021	11.7	289.00	3,381.30	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting onsite with defendants, employees, review business operations, calls with vendors, meeting with team	8/10/2021	11.7	340.00	3,978.00	Legal - Case Administration
John Hall	Onsite in LVNV, meet with defendant and employees, meeting with team, business operations and analysis in preparation for accounting	8/10/2021	11.7	310.00	3,627.00	Legal - Case Administration
Renee Diefenderfer	Investor communication (verbal and written)	8/10/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	File storage on shared drive	8/10/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Website build and email set up	8/10/2021	2.9	255.00	739.50	Legal - Case Administration
Renee Diefenderfer	Updates to investor call spreadsheet	8/10/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Employee communication (written)	8/10/2021	0.2	255.00	51.00	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	8/10/2021	2.0	150.00	300.00	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/11/2021	11.3	289.00	3,265.70	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting onsite with defendants, employees, review business operations, calls with vendors, meeting with team	8/11/2021	11.3	340.00	3,842.00	Legal - Case Administration
John Hall	Onsite in LVNV, meet with defendant and employees, meeting with team, business operations and analysis in preparation for accounting	8/11/2021	11.3	310.00	3,503.00	Legal - Case Administration
Renee Diefenderfer	Call with investor/agent	8/11/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Call with JBH recapping meeting with employees	8/11/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Review of emails from counsel, IT, Investors	8/11/2021	1.2	255.00	306.00	Legal - Case Administration
Renee Diefenderfer	Verbal and written communication with investor	8/11/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Calls with investors, documentation in investor tracker	8/11/2021	0.3	255.00	76.50	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	8/11/2021	1.1	150.00	165.00	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/12/2021	12.1	289.00	3,496.90	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting onsite with defendants, employees, review business operations, calls with vendors, meeting with team	8/12/2021	12.1	340.00	4,114.00	Legal - Case Administration
John Hall	Onsite in LVNV, meet with defendant and employees, meeting with team, business operations and analysis in preparation for accounting	8/12/2021	12.1	310.00	3,751.00	Legal - Case Administration
Renee Diefenderfer	Email review, legal doc review, document filing/storage	8/12/2021	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
August 6, 2021 - September 30, 2021
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Renee Diefenderfer	Written communication with PC employee	8/12/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Investor call backs, verbal communication	8/12/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Lease review from documents sent by counsel, document storage	8/12/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Data entry for employee list (information)	8/12/2021	1.7	255.00	433.50	Legal - Case Administration
Renee Diefenderfer	Document storage and organization	8/12/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Website database build, merge with database from JBH	8/12/2021	1.6	255.00	408.00	Legal - Case Administration
Renee Diefenderfer	Investor communication (verbal and written)	8/12/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email replies to investor inquiries asking to register	8/12/2021	0.7	255.00	178.50	Legal - Case Administration
Renee Diefenderfer	Email update and review from counsel	8/12/2021	0.1	255.00	25.50	Legal - Case Administration
Ysabel Willits	Meeting with CPA regarding tax returns	8/12/2021	0.5	150.00	75.00	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	8/12/2021	5.8	150.00	870.00	Legal - Case Administration
Ysabel Willits	Quick check in with JBH regarding wire transfers post freeze for investor calls	8/12/2021	0.2	150.00	30.00	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/13/2021	8.8	289.00	2,543.20	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting onsite with defendants, employees, review business operations, calls with vendors, meeting with team	8/13/2021	8.8	340.00	2,992.00	Legal - Case Administration
John Hall	Onsite in LVNV, meet with defendant and employees, meeting with team, business operations and analysis in preparation for accounting	8/13/2021	8.8	310.00	2,728.00	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	8/13/2021	3.2	150.00	480.00	Legal - Case Administration
John Hall	Processing statements in OCR program for accounting effort, compilation and standardization of outputs	8/16/2021	3.0	310.00	930.00	Financial - Forensic Accounting
Geoff Winkler	Call with defendants, employees, review business operations, calls with vendors, meeting with team	8/16/2021	7.1	340.00	2,414.00	Legal - Case Administration
John Hall	Team discussion of ongoing tasks	8/16/2021	0.7	310.00	217.00	Legal - Case Administration
John Hall	Review BOP, WC policies and call to broker for additional information. Analysis of received materials and memo to receiver with recommended next steps	8/16/2021	2.4	310.00	744.00	Legal - Case Administration
Renee Diefenderfer	Investor database work	8/16/2021	0.8	255.00	204.00	Legal - Case Administration
Renee Diefenderfer	legal document review	8/16/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Organize files and store on drive for access	8/16/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Meeting with JBH, GBW, and YKW for case next steps	8/16/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Call with investor regarding case and registering	8/16/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with YKW regarding case task and next steps	8/16/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Conversation with investor regarding case, banking, registering, claims	8/16/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Call with JBH regarding banking update and communication to investors, plan to forward mail, travel schedule	8/16/2021	0.8	255.00	204.00	Legal - Case Administration
Renee Diefenderfer	Updates to investor tracker	8/16/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Review of forms from website for contact information for YKW	8/16/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Follow up to website inquires asking them to register via form	8/16/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Review of legal docs and storage on drive	8/16/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Call with investor regarding case and registering	8/16/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email responses to investor inquiries	8/16/2021	0.2	255.00	51.00	Legal - Case Administration
Ysabel Willits	Meeting with GBW, RLD, and JBH regarding case next steps	8/16/2021	0.3	150.00	45.00	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	8/16/2021	1.3	150.00	195.00	Legal - Case Administration
Geoff Winkler	Call with defendants, employees, review business operations, calls with vendors, meeting with team	8/17/2021	5.9	340.00	2,006.00	Legal - Case Administration
John Hall	Review business formation documents and tax returns provided by counsel	8/17/2021	1.5	310.00	465.00	Legal - Case Administration
John Hall	Discussion of GPU cryptocurrency mining with KM	8/17/2021	0.6	310.00	186.00	Legal - Case Administration
John Hall	Review JK 2019 tax return	8/17/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Provide wire advice to FTCU	8/17/2021	0.2	310.00	62.00	Legal - Case Administration

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
August 6, 2021 - September 30, 2021
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
John Hall	Discuss additional needed items with counsel based on review of JK and BK tax returns	8/17/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Review documentation re: BT, discuss with MG and GBW	8/17/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Discuss insurance policies and ongoing needs with TMI (.9), provide and discuss appointment docs (.6).	8/17/2021	1.5	310.00	465.00	Legal - Case Administration
Renee Diefenderfer	Call and follow up email for investor regarding case	8/17/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Email follow ups via inquiries from website to fill out forms	8/17/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Document review and filing from counsel	8/17/2021	1.2	255.00	306.00	Legal - Case Administration
Renee Diefenderfer	Database for investors	8/17/2021	1.2	255.00	306.00	Legal - Case Administration
Renee Diefenderfer	Call with GBW regarding emails vs mailing info database	8/17/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Document review and storage	8/17/2021	0.8	255.00	204.00	Legal - Case Administration
Geoff Winkler	Call with defendants, employees, review business operations, calls with vendors, meeting with team	8/18/2021	7.8	340.00	2,652.00	Legal - Case Administration
John Hall	Review intake documents, file system management, discuss ongoing needs with RLD and GBW	8/18/2021	3.5	310.00	1,085.00	Legal - Case Administration
John Hall	Review ADP correspondence, call ADP and work through payroll needs W# and W2 and outstanding fees	8/18/2021	1.5	310.00	465.00	Legal - Case Administration
John Hall	Produce and review follow up questions and needed documents from PJ accountant	8/18/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review TM policies received; discuss with GBW	8/18/2021	1.3	310.00	403.00	Legal - Case Administration
John Hall	Review additional documents provided by PJ accountant	8/18/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Call from affected PC employee, FAQ	8/18/2021	0.2	310.00	62.00	Legal - Case Administration
Renee Diefenderfer	Call and follow up email with investor	8/18/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email investor communication	8/18/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Bank communication and file storage	8/18/2021	1.3	255.00	331.50	Legal - Case Administration
Renee Diefenderfer	Call with investor, follow up email, updates to call tracker	8/18/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Email communication to GBW and JBH regarding investor notes and research	8/18/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Call with investor, left a message	8/18/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Mailings to banks, envelopes, post office	8/18/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Email communication with investor	8/18/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with investor regarding case and registering	8/18/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Updates to investor call spreadsheet	8/18/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with investor/agent	8/18/2021	0.2	255.00	51.00	Legal - Case Administration
John Hall	Call from Murphy Co and discussion of needs for auction bid and coordinate meeting	8/19/2021	0.5	310.00	155.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Call with defendants, employees, review business operations, calls with vendors, meeting with team	8/19/2021	7.6	340.00	2,584.00	Legal - Case Administration
John Hall	Meeting with KM regarding mining operations economics	8/19/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Affected investor FAQ call	8/19/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review documents updated to relativity	8/19/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Review and discuss escalated investor issue from RLD	8/19/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Update contract list with collected data, scanning documents to file system	8/19/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Review draft of employee insurance notifications, discuss with GBW	8/19/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review and discuss transcript from affected agent, discuss with RLD	8/19/2021	0.2	310.00	62.00	Legal - Case Administration
Renee Diefenderfer	Call with investor	8/19/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	8/19/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Updated investor call log	8/19/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Review of information sent by investor, communication with JBH and GBW	8/19/2021	0.8	255.00	204.00	Legal - Case Administration
Renee Diefenderfer	Investor spreadsheet project	8/19/2021	0.3	255.00	76.50	Legal - Case Administration

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

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Renee Diefenderfer	Investor communication; return emails	8/19/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Employee database and letter preparation	8/19/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Document review, sent by counsel	8/19/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Preparation for next weeks field work	8/19/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Research for agent contact information	8/19/2021	0.4	255.00	102.00	Legal - Case Administration
John Hall	Call with auction company to coordinate onsite visit	8/20/2021	0.5	310.00	155.00	Legal - Asset Disposition
Geoff Winkler	Prepare for onsite meetings, continue review of business operations, call with employees, call with defendant	8/20/2021	5.8	340.00	1,972.00	Legal - Case Administration
John Hall	Review CPA production and formulate request of DM for MG	8/20/2021	1.5	310.00	465.00	Legal - Case Administration
John Hall	Agent data extraction from WordPress (1.9) wealth builder data troubleshooting (.5)	8/20/2021	2.4	310.00	744.00	Legal - Case Administration
Renee Diefenderfer	Letter preparation for employees regarding health care termination	8/20/2021	1.5	255.00	382.50	Legal - Case Administration
Renee Diefenderfer	Website communication to IT	8/20/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Post office for address and employee mailings	8/20/2021	0.9	255.00	229.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	8/20/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Updates to investor tracker	8/20/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Research to follow up with information following investor call	8/20/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Email communication with investor, following up from call	8/20/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Update to the PC receivership website	8/20/2021	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review operations calculations, benchmark, prepare for meetings	8/22/2021	3.2	340.00	1,088.00	Legal - Case Administration
Josh McGraw	Field Work: Meeting with RLD in preparation for field work; meetings with GBW to review priorities and tasks for the week, Review legal documents	8/22/2021	2.3	255.00	586.50	Legal - Case Administration
Renee Diefenderfer	Field Work: Meeting with JPM in preparation for field work; meetings with GBW to review priorities and tasks for the week	8/22/2021	1.3	255.00	331.50	Legal - Case Administration
John Hall	Processing data in OCR reader, troubleshooting CC transactions	8/23/2021	4.3	310.00	1,333.00	Financial - Accounting/Auditing
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/23/2021	10.8	289.00	3,121.20	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/23/2021	10.8	340.00	3,672.00	Legal - Case Administration
Josh McGraw	Field work; Meetings with GBW and RLD, reviewed legal documents	8/23/2021	10.8	255.00	2,754.00	Legal - Case Administration
Renee Diefenderfer	Meetings with GBW and JPM, update project tasks, coordinate PC employees, investor calls, emails	8/23/2021	10.8	255.00	2,754.00	Legal - Case Administration
John Hall	Working in OCR reader, pulling and comparing WordPress outputs and troubleshooting	8/24/2021	3.2	310.00	992.00	Financial - Accounting/Auditing
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/24/2021	10.7	289.00	3,092.30	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/24/2021	10.7	340.00	3,638.00	Legal - Case Administration
Josh McGraw	Field work; reviewed legal documents, utility authorization requests, Meetings with GBW and RLD	8/24/2021	10.7	255.00	2,728.50	Legal - Case Administration
Renee Diefenderfer	Field work; calls and emails with investors, coordination with PC employees, training, coordination with retail space for move	8/24/2021	10.7	255.00	2,728.50	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/25/2021	13.7	289.00	3,959.30	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/25/2021	13.7	340.00	4,658.00	Legal - Case Administration
Josh McGraw	Field work; move items from retail location, emails with investors, meetings with GBW and RLD	8/25/2021	15.7	255.00	4,003.50	Legal - Case Administration
Renee Diefenderfer	Field work; move items from retail location, walk throughs and communication with mall mgmt., calls, 422 emails with investors, meetings with GBW and JPM, Post Office	8/25/2021	15.7	255.00	4,003.50	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/26/2021	11.7	289.00	3,381.30	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/26/2021	11.7	340.00	3,978.00	Legal - Case Administration

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Summary of Fees of Receiver and Retained Personnel
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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Field work; move items from retail location, affiliate interviews, investor emails, communication with landlord & utilities authorization requests	8/26/2021	11.7	255.00	2,983.50	Legal - Case Administration
Renee Diefenderfer	Field work; conference calls, hourly pay calculations, coordination with auctioneer,	8/26/2021	11.7	255.00	2,983.50	Legal - Case Administration
John Hall	Compiling and standardizing OCR outputs	8/27/2021	1.8	310.00	558.00	Financial - Accounting/Auditing
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/27/2021	6.4	289.00	1,849.60	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/27/2021	6.4	340.00	2,176.00	Legal - Case Administration
Josh McGraw	Field work; utility transfer conversation with utility, document review, Investor property lien review, investor calls and emails	8/27/2021	7.4	255.00	1,887.00	Legal - Case Administration
Renee Diefenderfer	Field work; mail review, document review, investor calls and emails	8/27/2021	6.4	255.00	1,632.00	Legal - Case Administration
Renee Diefenderfer	Text communication with investor	8/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Text communication with investor	8/28/2021	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Review and respond to emails, review banking data, draft questions (2.2)	8/29/2021	2.2	340.00	748.00	Legal - Case Administration
John Hall	Processing and analysis of bank statements (1.2 with JPM, 7.3 solo)	8/30/2021	8.5	310.00	2,635.00	Financial - Forensic Accounting
Josh McGraw	conversion of bank statements	8/30/2021	1.3	255.00	331.50	Financial - Forensic Accounting
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/30/2021	8.5	289.00	2,456.50	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/30/2021	11.9	340.00	4,046.00	Legal - Case Administration
Josh McGraw	Utility transfer conversation	8/30/2021	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Email to account executive at utility	8/30/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Call	8/30/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Call	8/30/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Call	8/30/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Investor Emails	8/30/2021	1.5	255.00	382.50	Legal - Case Administration
Josh McGraw	Call with agent	8/30/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Returning a call with an investor	8/30/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Team meeting status	8/30/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Text communication to coordinate move from Pasadena	8/30/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	WC trouble shooting	8/30/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Administrative case work	8/30/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Email and chat communication regarding investor call follow up	8/30/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Utilities invoice and communication with GBW	8/30/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Video download, review, and communication with JPM	8/30/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Change of address: USPS	8/30/2021	0.8	255.00	204.00	Legal - Case Administration
Renee Diefenderfer	Team meeting to discuss next steps and action items	8/30/2021	0.5	255.00	127.50	Legal - Case Administration
Ysabel Willits	General meeting with GBW, RLD, JPM and JBH regarding case next steps	8/30/2021	0.5	150.00	75.00	Legal - Case Administration
John Hall	Processing and analysis of bank statements	8/31/2021	2.8	310.00	868.00	Financial - Forensic Accounting
Josh McGraw	Conversion of bank statements	8/31/2021	1.3	255.00	331.50	Financial - Forensic Accounting
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	8/31/2021	7.7	289.00	2,225.30	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	8/31/2021	10.5	340.00	3,570.00	Legal - Case Administration
Josh McGraw	meeting with RLD regarding tasks	8/31/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with vendor to discuss contract amount due	8/31/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor emails	8/31/2021	0.9	255.00	229.50	Legal - Case Administration
Renee Diefenderfer	Call with former PC employee	8/31/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Coordination of Pasadena product pick up	8/31/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Call with former PC employee/location	8/31/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JPM regarding tasks	8/31/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Conference call logistics work	8/31/2021	0.3	255.00	76.50	Legal - Case Administration

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Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Renee Diefenderfer	Proposal review	8/31/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Document review and filing	8/31/2021	0.1	255.00	25.50	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	9/1/2021	8.1	289.00	2,340.90	Legal - Asset Analysis and Recovery
	Meeting with contractors, prepare the inventory for auction, onsite evaluation, discussion with counsel	9/1/2021	11.8	340.00	4,012.00	Legal - Business Operations
Geoff Winkler	Review payroll data and coordinate wire with GBW	9/1/2021	0.9	310.00	279.00	Legal - Case Administration
John Hall	Review Lincoln asset and discuss with RLD	9/1/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review GN CA letter and discuss with GBW, reply to counsel re same	9/1/2021	0.6	310.00	186.00	Legal - Case Administration
Josh McGraw	Investor Call	9/1/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Update investor call tracker	9/1/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Investor Call	9/1/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Investor Call	9/1/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Call	9/1/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Investor Emails	9/1/2021	1.5	255.00	382.50	Legal - Case Administration
Renee Diefenderfer	Paperwork review, scanning, filing, and team communication	9/1/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Investor email communication	9/1/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Mail forwarding	9/1/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Website update	9/1/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Project checklist updates	9/1/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Task meeting with JPM	9/1/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Review of legal doc	9/1/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with JBH discussing accounting structure	9/2/2021	1.2	255.00	306.00	Financial - Forensic Accounting
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	9/2/2021	7.8	289.00	2,254.20	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting with contractors, prepare the inventory for auction, onsite evaluation	9/2/2021	10.2	340.00	3,468.00	Legal - Business Operations
John Hall	Discuss accounting project with JPM	9/2/2021	1.2	310.00	372.00	Legal - Case Administration
Josh McGraw	Call with investor	9/2/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with investor	9/2/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Call with investor	9/2/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Returning v/m from investor	9/2/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Emails	9/2/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Investor Call	9/2/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with investor	9/2/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with investor	9/2/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Call with investor	9/2/2021	0.3	255.00	76.50	Legal - Case Administration
Michelle Priddy	Review assets, prepare inventory, clean up data, price, prepare for auction	9/3/2021	7.0	289.00	2,023.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Meeting with contractors, prepare the inventory for auction, onsite evaluation	9/3/2021	8.2	340.00	2,788.00	Legal - Business Operations
	Troubleshooting WordPress site and work with AV to resolve. Pull additional attachments	9/3/2021	2.4	310.00	744.00	Legal - Case Administration
John Hall	Querying Relativity for found search terms	9/3/2021	0.8	310.00	248.00	Legal - Case Administration
Josh McGraw	Calls with COX documentation on Utility Transfer	9/3/2021	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Call with GBW regarding COX issues and Investor calls	9/3/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW for vendor invoice review	9/3/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Emails	9/3/2021	1.5	255.00	382.50	Legal - Case Administration
	Team discussion of outstanding tasks (.4), emails with MG and KA re standing meeting (.1), discuss technical issues re access to WooCommerce (.3), call with AV re access to systems, email follow-up (.4), emails with RLD re employee questions (.2), emails with AV re drives, access (.2)	9/7/2021	1.6	340.00	544.00	Legal - Case Administration
Geoff Winkler	Team discussion of ongoing tasks	9/7/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Meet with JPM and YKW to coordinate on ongoing tasks	9/7/2021	1.0	310.00	310.00	Legal - Case Administration

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John Hall	Troubleshooting WordPress sites	9/7/2021	0.6	310.00	186.00	Legal - Case Administration
Josh McGraw	Team meeting status	9/7/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Investor Emails	9/7/2021	1.2	255.00	306.00	Legal - Case Administration
Josh McGraw	Email to team regarding Twilio Account for PC	9/7/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor lien research	9/7/2021	2.2	255.00	561.00	Legal - Case Administration
Josh McGraw	Reviewing bank statement output	9/8/2021	2.2	255.00	561.00	Financial - Forensic Accounting
	Review email from TM, email to counsel for investor re call (.1), call from counsel (.4), work on technical access issues (1.1), review initial data from checking account (.8), call with counsel for investor (.4), call with potential purchaser (.3), review data capture and research next steps (.5)	9/8/2021	3.6	340.00	1,224.00	Legal - Case Administration
Geoff Winkler	Reviewing downloaded WordPress attachments	9/8/2021	3.4	310.00	1,054.00	Legal - Case Administration
John Hall	Conversation with COX customer service for transfer	9/8/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Conversation with COX receivable management for transfer	9/8/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with YKW to discuss investor emails	9/8/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with COX Corporate and left a message with legal counsel	9/8/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Investor Call	9/8/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to COX legal counsel	9/8/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor emails	9/8/2021	0.4	255.00	102.00	Legal - Case Administration
Ysabel Willits	Meeting with JPM regarding investor communication	9/8/2021	0.4	150.00	60.00	Legal - Case Administration
Ysabel Willits	Investor call and email correspondence	9/8/2021	1.0	150.00	150.00	Legal - Case Administration
Josh McGraw	Bank account analysis and accounting	9/9/2021	5.5	255.00	1,402.50	Financial - Forensic Accounting
John Hall	Discuss GPU sale task with JPM	9/9/2021	0.4	310.00	124.00	Legal - Asset Analysis and Recovery
	Call with counsel to discuss case (.5), work with JPM re inventory (.1), call with third party (.3), complete utility changeover paperwork (.3), email to MG re meeting (.1), call with investors attorney (.4), emails with JPM re inventory (.1), review email from CB, email to counsel, email to MC (.2), review initial account review for JK CC (.4), emails with potential auctioneer (.1), emails with SK and MG re documents (.2), call with agent to discuss next steps, ways to cooperate (.5)	9/9/2021	3.2	340.00	1,088.00	Legal - Case Administration
Geoff Winkler	Organizing and connecting tables to attachments in Access	9/9/2021	4.9	310.00	1,519.00	Legal - Case Administration
John Hall	Investor Call	9/9/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to consultant for inventory	9/9/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Call	9/9/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Email to GBW to coordinate inventory list	9/9/2021	0.1	255.00	25.50	Legal - Case Administration
Ysabel Willits	Meeting with JBH and JPM regarding database information extraction	9/10/2021	1.0	150.00	150.00	Financial - Accounting/Auditing
Josh McGraw	Investor Database creation	9/10/2021	3.3	255.00	841.50	Financial - Data Analysis
John Hall	Compilation and standardization of forensic accounting data	9/10/2021	5.1	310.00	1,581.00	Financial - Forensic Accounting
Josh McGraw	Bank account analysis and accounting	9/10/2021	1.2	255.00	306.00	Financial - Forensic Accounting
Josh McGraw	Call with JBH to discuss forensic accounting	9/10/2021	0.6	255.00	153.00	Financial - Forensic Accounting
Josh McGraw	Call with JBH and YKW to discuss database	9/10/2021	1.0	255.00	255.00	Financial - Forensic Accounting
Ysabel Willits	Meeting with JBH regarding ongoing task for forensic accounting	9/10/2021	0.5	150.00	75.00	Financial - Forensic Accounting
	Discussion with JBH re investor and agent database (.6), review updated banking and discuss documents needs (.5), call with investor (.3), call with vendor to discuss status, plans (.3), call with RE agent re sale of properties, plans (.4)	9/10/2021	2.1	340.00	714.00	Legal - Case Administration
Geoff Winkler	Discuss woo commerce project with JPM and YKW	9/10/2021	1.0	310.00	310.00	Legal - Case Administration
John Hall	Discuss indexing project with YKW	9/10/2021	0.6	310.00	186.00	Legal - Case Administration
John Hall	Organizing and connecting tables to attachments in Access; discuss with GBW	9/10/2021	1.4	310.00	434.00	Legal - Case Administration
Josh McGraw	Review documents for Investor	9/10/2021	1.1	255.00	280.50	Legal - Case Administration
Josh McGraw	Investor Database	9/13/2021	4.1	255.00	1,045.50	Financial - Data Analysis

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(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
	Team meeting to discuss case (.6), meeting with JBH and counsel to discuss realtors (.5), work with JPM re utilities (.1), call with investor (.3), emails with counsel to discuss upcoming moveout (.2), call with TK re hardware discovered, status of auction prep, email with AV re imaging (.4), emails with agent re questions (.2), review and respond to AV questions (.2), review master and supplemental inventory, inquire, update (1.2)	9/13/2021	3.6	340.00	1,224.00	Legal - Case Administration
Geoff Winkler						
John Hall	Team meeting to discuss ongoing tasks	9/13/2021	0.6	310.00	186.00	Legal - Case Administration
John Hall	Review escalated FAQ issue from RLD and advise	9/13/2021	0.2	310.00	62.00	Legal - Case Administration
John Hall	Review and discuss realtor issues with GBW, MG, KA	9/13/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Discuss outstanding issues with AV re: data tables from WP	9/13/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Discuss investor conference call logistics with RLD	9/13/2021	0.2	310.00	62.00	Legal - Case Administration
John Hall	review and update agenda for team meeting	9/13/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review and analysis of inventory, working with data to tie tables out to accounting systems	9/13/2021	4.2	310.00	1,302.00	Legal - Case Administration
Josh McGraw	call with RLD database conversion, investor communication	9/13/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Team meeting status	9/13/2021	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Call with RLD investor call updates	9/13/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with COX	9/13/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with GBW regarding utilities	9/13/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to consultant for inventory	9/13/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Cox explanation letter and email to GBW	9/13/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Conference call logistics work	9/13/2021	0.7	255.00	178.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JPM regarding tasks	9/13/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JBH, GBW, JPM, and YKW for case next steps	9/13/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Communication with auctioneer regarding follow up	9/13/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with JPM regarding data task	9/13/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Call preparation	9/13/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Text communication with agent	9/13/2021	0.1	255.00	25.50	Legal - Case Administration
Ysabel Willits	Meeting with GBW, RLD, JPM and JBH regarding case next steps	9/13/2021	0.6	150.00	90.00	Legal - Case Administration
Josh McGraw	Investor Database	9/14/2021	0.8	255.00	204.00	Financial - Data Analysis
	Team meeting to discuss case (1.2), call with potential realtor (.4), call with potential realtor (.4), call with JBH to discuss banking (.5), review auction information (.3), discuss WF information (.1), call with JPM re properties (.2), emails with MW and JB re reconciliation, entries (.2), email to JPM and JBH re GPU sales (.2), review and email to MAP re Pasadena location inventory (.2), review and emails with counsel re auction proposal (.3), emails with RLD re WF account liquidation (.2), email and call with BW re third party litigation (.4), follow-up with two realtors with court orders and property information (.2), review and revise notarized letter and prepare for filing (.2)	9/14/2021	5.0	340.00	1,700.00	Legal - Asset Analysis and Recovery
Geoff Winkler						
John Hall	Research realtors for properties and bare land	9/14/2021	0.3	310.00	93.00	Legal - Asset Disposition
John Hall	Review auction information from GBW	9/14/2021	0.3	310.00	93.00	Legal - Asset Disposition
John Hall	Work through troubleshooting Woo Commerce issues with JPM and JP	9/14/2021	2.6	310.00	806.00	Legal - Case Administration
John Hall	Meet with counsel and full team on ongoing case management items	9/14/2021	1.2	310.00	372.00	Legal - Case Administration
John Hall	Review banking reconciliation issues and troubleshoot with GBW	9/14/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Review graphics cards inventory and discuss with MP and team	9/14/2021	0.6	310.00	186.00	Legal - Case Administration
John Hall	Review WF information from TM and discuss with RLD and GBW	9/14/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Review zoning and purchase info for Searchlight with JPM	9/14/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Review notices to vacate	9/14/2021	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Call with JBH and consultant for database	9/14/2021	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Call with counsel & team	9/14/2021	1.2	255.00	306.00	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Josh McGraw	Call with GBW regarding property calls	9/14/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to consultant for database	9/14/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to consultant for inventory	9/14/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW regarding real property	9/14/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with GBW and real estate broker	9/14/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Call with GBW and second real estate broker	9/14/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Researching Zoning on properties	9/14/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Email communication with agents	9/14/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Meeting with Legal regarding tasks and next steps	9/14/2021	1.2	255.00	306.00	Legal - Case Administration
Renee Diefenderfer	Text communication with former PC employee	9/14/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Task organization in preparation for team meeting	9/14/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Call with former PC employee	9/14/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	9/14/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Voicemail review and follow up	9/14/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Forensic Accounting - Editing accounting file	9/15/2021	0.5	255.00	127.50	Financial - Forensic Accounting
Josh McGraw	JBH discussing counsel financial request	9/15/2021	1.0	255.00	255.00	Financial - Forensic Accounting
Renee Diefenderfer	Liquidate bank account task; administrative and call to bank (call was 1 hour and 18 min)	9/15/2021	1.8	255.00	459.00	Legal - Asset Analysis and Recovery
John Hall	Discuss GPUs with JPM and call to MP	9/15/2021	0.4	310.00	124.00	Legal - Asset Disposition
	Call with RLD to discuss emails for upcoming conference call (.2), emails with JPM re inventory, sale (.2), review request from CB to update account application, complete updated information request (.3), review sales proposals (.4), emails with AV re shipping, work to be completed (.2), call with vendor to discuss unwinding sales (.4), call with second vendor to discuss buyback (.3), review draft email (.1), review and process contractor hours (.2), call with vendor re pickup and delivery (.2), review letter from third party (.2)	9/15/2021	2.7	340.00	918.00	Legal - Case Administration
John Hall	Review of asset list of inventory and cross check against report provided	9/15/2021	0.8	310.00	248.00	Legal - Case Administration
Josh McGraw	Add assets into management software	9/15/2021	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	GPU inventory list review and email with consultant	9/15/2021	1.7	255.00	433.50	Legal - Case Administration
Josh McGraw	Reviewed court documents	9/15/2021	0.7	255.00	178.50	Legal - Case Administration
Josh McGraw	Call with investor	9/15/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Email to consultant on Inventory and email to team on inventory	9/15/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Investor emails	9/15/2021	0.9	255.00	229.50	Legal - Case Administration
Renee Diefenderfer	Voicemail review and follow up	9/15/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	9/15/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Conference call logistics work	9/15/2021	2.0	255.00	510.00	Legal - Case Administration
Renee Diefenderfer	Call with GBW on emails from website for conference call	9/15/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Text communication with agent	9/15/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Text communication with investor	9/15/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Updates to investor call spreadsheet	9/15/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email communication review including updates on tasks	9/15/2021	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Call with JBH regarding forensic accounting	9/16/2021	0.4	255.00	102.00	Financial - Forensic Accounting
	Emails with CB re account documentation (.2), review subpoena and conflicts waiver (.2), discussion with counsel re property to recover (.2), review updated inventory with additional location (.3), review sale proposal (.2), work on updating server issues (1.8), call with JBH re documents (.4), process utility change (.2)	9/16/2021	3.5	340.00	1,190.00	Legal - Case Administration
John Hall	Review computer hardware reconciliation list (.7), discussion with MP (.3)	9/16/2021	1.0	310.00	310.00	Legal - Case Administration
John Hall	Review of CC transactions, request additional subpoena sent to Capital One	9/16/2021	1.2	310.00	372.00	Legal - Case Administration
John Hall	Review used items list and discuss with MP	9/16/2021	0.3	310.00	93.00	Legal - Case Administration

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Josh McGraw	Call with RLD external communication and counsel items	9/16/2021	0.7	255.00	178.50	Legal - Case Administration
Josh McGraw	v/m for investor	9/16/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with secondhand buyer	9/16/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email with consultant about inventory	9/16/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Asset research on gas	9/16/2021	1.3	255.00	331.50	Legal - Case Administration
Josh McGraw	Review computer inventory provided by consultant	9/16/2021	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Review broker proposal for real property assets	9/16/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Second hand buyer quote request	9/16/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Investor Emails	9/16/2021	1.1	255.00	280.50	Legal - Case Administration
Josh McGraw	Email to consultant on database	9/16/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewed counsel documents	9/16/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Task updates to project list	9/16/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JPM regarding specific task and project tracking	9/16/2021	0.7	255.00	178.50	Legal - Case Administration
Renee Diefenderfer	Emails to investors	9/16/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Call and texts with employee re: insurance	9/16/2021	0.4	255.00	102.00	Legal - Case Administration
Ysabel Willits	Accounting file inter-account transfers	9/17/2021	3.8	150.00	570.00	Financial - Accounting/Auditing
Josh McGraw	Call with IT consultant	9/17/2021	0.2	255.00	51.00	Financial - Data Analysis
Ysabel Willits	WC index	9/17/2021	2.7	150.00	405.00	Financial - Forensic Accounting
Ysabel Willits	Meeting with JPM regarding WC index	9/17/2021	0.3	150.00	45.00	Financial - Forensic Accounting
Geoff Winkler	Research information needed for subpoena, emails with counsel re the same (.3), continued work on server issues (1.3), emails with MC re funds transfer (.2), emails with AV re status, staffing changes (.2), emails with counsel re waiver and subpoena (.1), review and set up CB account (.6), emails with vendor re payment (.1)	9/17/2021	2.8	340.00	952.00	Legal - Case Administration
John Hall	Work in WordPress tables to determine ability to pull together all needed data from tables; Discuss outstanding issues with AV from SF	9/17/2021	3.2	310.00	992.00	Legal - Case Administration
John Hall	Analyze and review transaction list sample data pulled by SF	9/17/2021	1.2	310.00	372.00	Legal - Case Administration
Josh McGraw	Review Access Database	9/17/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Call with RLD inventory, investor update, task list	9/17/2021	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Email to IT consultant	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to inventory consultant	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to secondhand buyer	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors	9/17/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Call with investor	9/17/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	update investor call tracker	9/17/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to RLD to update email distribution list	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewed attachments from investor	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewed documents from IT consultant	9/17/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Requested quote from secondhand buyer	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Reviewed court documents	9/17/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Conversation with YKW to discuss investment database	9/17/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Reviewed interviews and files from investor	9/17/2021	1.1	255.00	280.50	Legal - Case Administration
Renee Diefenderfer	Conference call logistics work	9/17/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Review of information sent by legal	9/17/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Email communication with investor	9/17/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JPM regarding case tasks	9/17/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Project management of tasks	9/17/2021	0.6	255.00	153.00	Legal - Case Administration
John Hall	Accounting categorization of internal transfers between accounts	9/20/2021	4.2	310.00	1,302.00	Financial - Accounting/Auditing
Josh McGraw	Call with JBH on forensic accounting	9/20/2021	1.0	255.00	255.00	Financial - Forensic Accounting

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Josh McGraw	Forensic Accounting - Editing accounting file	9/20/2021	4.0	255.00	1,020.00	Financial - Forensic Accounting
Ysabel Willits	WC index	9/20/2021	1.1	150.00	165.00	Financial - Forensic Accounting
	Discuss inventory with JBH and YKW (.6), email to JBH re inventory (.1), emails with counsel re upcoming hearing, report filing (.2), call with attorney for investor (.3), review report and email to MAP (.3), emails with KA, review court filing (.1), email from KA re notice to vacate (.1), review correspondence between counsel and defendant's counsel (.2), review potential employee payments (.8), call with investor (.3)	9/20/2021	3.0	340.00	1,020.00	Legal - Case Administration
Geoff Winkler		9/20/2021	0.6	310.00	186.00	Legal - Case Administration
John Hall	Review initial master list from MP, discuss with GBW and YKW	9/20/2021	0.2	310.00	62.00	Legal - Case Administration
John Hall	Review status call email from counsel, discuss with GBW	9/20/2021	2.4	310.00	744.00	Legal - Case Administration
John Hall	Review JPM work and discuss transfers and accounting	9/20/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with secondhand buyer	9/20/2021	0.3	255.00	76.50	Financial - Data Analysis
Josh McGraw	Call with IT consultant	9/21/2021	0.1	255.00	25.50	Financial - Forensic Accounting
Josh McGraw	Forensic Accounting - Editing accounting file	9/21/2021	1.3	255.00	331.50	Financial - Forensic Accounting
Josh McGraw	Forensic Accounting - Editing accounting file	9/21/2021	2.8	255.00	714.00	Financial - Forensic Accounting
	Call with team and counsel (.5), email and discussion with JBH re banking and transfers (.3), prepare for upcoming visit to warehouse (1.1), emails with counsel re report due date, timing (.2), emails with KW (.1), prepare and status report with the court (.8), respond to investor questions (.2), process vendor payments (.3), review draft status report (.2), review email from WR, contact vendor (.3), review status of employee assets (.2), review updated master inventory and mapping (.5), review contact from agent attorney and discussion with RLD (.2)	9/21/2021	4.9	340.00	1,666.00	Legal - Case Administration
Geoff Winkler	Review insurance policies, call to JK at brokerage re: enforce policies and process to make claims	9/21/2021	1.5	310.00	465.00	Legal - Case Administration
John Hall	review and update agenda for call	9/21/2021	0.1	310.00	31.00	Legal - Case Administration
John Hall	Review draft status report	9/21/2021	0.4	310.00	124.00	Legal - Case Administration
John Hall	Review timing of deposits from July 2021 relative to the various court orders entry.	9/21/2021	1.1	310.00	341.00	Legal - Case Administration
John Hall	Review exports and cross check to WordPress for accuracy and completeness	9/21/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Review draft accounting for potential asset purchases	9/21/2021	0.2	310.00	62.00	Legal - Case Administration
John Hall	Review draft request from MG on CO	9/21/2021	0.4	310.00	124.00	Legal - Case Administration
Josh McGraw	Meeting with counsel	9/21/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Call RLD regarding legal tasks	9/21/2021	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Email to counsel	9/21/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to IT consultant	9/21/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to GBW & JBH regarding bank deposits	9/21/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with COX	9/21/2021	0.9	255.00	229.50	Legal - Case Administration
Josh McGraw	Call with GBW to discuss account transfer	9/21/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to secondhand buyers	9/21/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Meeting with Legal regarding tasks and next steps	9/21/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Call with investor regarding questions for conference call	9/21/2021	0.1	255.00	25.50	Legal - Case Administration
	Call and follow up email with investor attorney regarding questions for conference call	9/21/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Conference call coordination	9/21/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Updates to the website (conference call and email removal)	9/21/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Email review and replies with investors	9/21/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Call with JPM regarding task for legal	9/21/2021	0.8	255.00	204.00	Legal - Case Administration
Renee Diefenderfer	Call with investor regarding questions and conference call	9/21/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Email review and follow up to investor	9/21/2021	0.2	255.00	51.00	Legal - Case Administration

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Renee Diefenderfer	Mail review and forwarding	9/21/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Email communication with investors via website forms/messages	9/21/2021	0.7	255.00	178.50	Legal - Case Administration
John Hall	Work on accounting system file	9/22/2021	1.5	310.00	465.00	Financial - Accounting/Auditing
John Hall	Work with JPM and YKW on accounting file	9/22/2021	0.5	310.00	155.00	Financial - Accounting/Auditing
Ysabel Willits	Meeting with JBH and JPM regarding accounting file	9/22/2021	0.5	150.00	75.00	Financial - Accounting/Auditing
Josh McGraw	Compare WooCommerce with folder export to validate data	9/22/2021	0.2	255.00	51.00	Financial - Data Analysis
Josh McGraw	Forensic Accounting meeting with JBH and YKW	9/22/2021	0.8	255.00	204.00	Financial - Forensic Accounting
	Call with team to discuss case (.6), review inventory offer (.1), process paperwork, file changes, emails with JPM re utility transfer (.3), discussion with RLD re investor questions (.2), emails with JP re evidence (.2), review order and process payments (.4), emails with JPM re account holder update (.2)	9/22/2021	2.0	340.00	680.00	Legal - Case Administration
Geoff Winkler	Meet with GBW YKW RLD JPM for team discussion	9/22/2021	0.6	310.00	186.00	Legal - Case Administration
John Hall	Troubleshooting WP account with JP	9/22/2021	0.8	310.00	248.00	Legal - Case Administration
John Hall	Automation of email reading in MS Access	9/22/2021	2.2	310.00	682.00	Legal - Case Administration
John Hall	Discuss account closing with vendor to come pick up items when team is onsite	9/22/2021	0.5	310.00	155.00	Legal - Case Administration
	Discussion of new add ons in WordPress with JP in order to export needed data and reports	9/22/2021	0.5	310.00	155.00	Legal - Case Administration
John Hall	Troubleshoot GoDaddy issues with data acquisition needs	9/22/2021	0.8	310.00	248.00	Legal - Case Administration
John Hall	Review GPU quote and discuss with team	9/22/2021	0.3	310.00	93.00	Legal - Case Administration
John Hall	Affected claimant FAQ	9/22/2021	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Team meeting status	9/22/2021	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Calls with Cox	9/22/2021	1.0	255.00	255.00	Legal - Case Administration
Josh McGraw	Research auctioneers	9/22/2021	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Call with auctioneer	9/22/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with alarm vendor	9/22/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Review secondhand buyer offer and researched pricing online	9/22/2021	1.5	255.00	382.50	Legal - Case Administration
Josh McGraw	Email to GBW and JBH for inventory offer	9/22/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Conference call logistics work	9/22/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Investor email review and replies	9/22/2021	2.5	255.00	637.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JBH/GBW/JPM/YKW regarding case and next steps	9/22/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Task tracking (organization, updating)	9/22/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Call with investor	9/22/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	9/22/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Review of docs sent by legal, storage	9/22/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Calls with 2 investors including follow up emails	9/22/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Updates to investor call log	9/22/2021	0.1	255.00	25.50	Legal - Case Administration
	Call with website builder regarding forms and requesting a table for data; follow up email	9/22/2021	0.5	255.00	127.50	Legal - Case Administration
Ysabel Willits	Meeting with GBW, RLD, JPM and JBH regarding case next steps	9/22/2021	0.6	150.00	90.00	Legal - Case Administration
John Hall	Meet with JPM and discuss draft COA for accounting file	9/23/2021	0.7	310.00	217.00	Financial - Accounting/Auditing
Josh McGraw	Compare WooCommerce with folder export to validate data	9/23/2021	1.5	255.00	382.50	Financial - Data Analysis
Josh McGraw	Create chart of accounts	9/23/2021	1.0	255.00	255.00	Financial - Forensic Accounting
Josh McGraw	Call with JBH discuss forensic accounting	9/23/2021	0.4	255.00	102.00	Financial - Forensic Accounting
Renee Diefenderfer	Communication with auctioneer regarding follow up	9/23/2021	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
John Hall	Call with ADP re: outstanding tax filing requirements	9/23/2021	0.6	310.00	186.00	Legal - Business Operations

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
	Review proposal, call with JBH and RLD (.7), discuss alarm system (.1), emails with CH re payment (.1), emails with RLD re pre-receivership vendor (.2), email with TM re third party attorney (.1), emails with counsel re third party attorney (.2), call with counsel (.3), emails with counsel re sale and auction motions (.2), review recorded motion (.1), review insurance documents (.3)	9/23/2021	2.3	340.00	782.00	Legal - Case Administration
Geoff Winkler						
John Hall	Troubleshooting woo commerce database with JPM	9/23/2021	1.5	310.00	465.00	Legal - Case Administration
John Hall	Review JS case, contingency fee proposal, discuss with GBW and RLD	9/23/2021	0.8	310.00	248.00	Legal - Case Administration
Josh McGraw	Call with alarm vendor	9/23/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Message to GBW regarding alarm service	9/23/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to JBH & YKW for COA	9/23/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Email to JBH & YKW for database analysis	9/23/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call to auctioneers	9/23/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to RLD regarding insurance renewal	9/23/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Investor email communication	9/23/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Mail review and processing	9/23/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Unemployment paperwork for former employee	9/23/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Organization of potential creditor claims	9/23/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Emails to investors	9/23/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Auction proposal communication	9/24/2021	0.5	255.00	127.50	Legal - Asset Analysis and Recovery
	Work with JPM re utilities (.1), emails with RLD re vendor equipment pickup (.1), prepare financials (.4), email with JP re evidence (.1), review and process vendor payments (.3), call with vendor and legal to discuss issues with transfer (.4)	9/24/2021	1.4	340.00	476.00	Legal - Case Administration
Geoff Winkler						
John Hall	Review final inventory and FAQ with MP	9/24/2021	0.5	310.00	155.00	Legal - Case Administration
Josh McGraw	Email to GBW for COX payment	9/24/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with COX to remove late fee	9/24/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to second hand buyer	9/24/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	9/24/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Update to website for conference call - email prep	9/24/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Review and filing legal doc on drive	9/24/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Emails with investors	9/24/2021	0.5	255.00	127.50	Legal - Case Administration
John Hall	Review renewals documents from TMI	9/26/2021	0.2	310.00	62.00	Legal - Case Administration
	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors, investor call, meeting with counsel	9/27/2021	12.5	340.00	4,250.00	Legal - Case Administration
Geoff Winkler						
	Field work in LVNV; Discussion and planning with GBW; On flight compiling and standardization of cc transactions for accounting file; wind down of business operations at warehouse location; review of BK personal property to release; work with security company; interview with other agency on case; prepare office for auction; clean up office	9/27/2021	12.5	310.00	3,875.00	Legal - Case Administration
John Hall						
Josh McGraw	Call with RLD about Utilities invoice, inventory, and auctioneer	9/27/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Emails to RLD, inventory investor responses and invoices	9/27/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to Vendor	9/27/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Mail processing and communication	9/27/2021	0.4	255.00	102.00	Legal - Case Administration
Renee Diefenderfer	Website update for conference call	9/27/2021	1.2	255.00	306.00	Legal - Case Administration
Renee Diefenderfer	Conference call questions communication	9/27/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Mail forwarding task	9/27/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Meeting with JPM regarding utility and inventory tasks	9/27/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Call with investor/agent	9/27/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Call with investor	9/27/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Updates to call tracker	9/27/2021	0.3	255.00	76.50	Legal - Case Administration

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<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Renee Diefenderfer	Emails with investors	9/27/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Preparation for call with legal	9/27/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Forensic accounting - payroll	9/28/2021	3.0	255.00	765.00	Financial - Forensic Accounting
Renee Diefenderfer	Inventory communication and filing regarding auction	9/28/2021	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	9/28/2021	10.5	340.00	3,570.00	Legal - Case Administration
John Hall	Field work in LVNV wind down of warehouse in preparation for auction, review new assets and documents found	9/28/2021	10.5	310.00	3,255.00	Legal - Case Administration
Josh McGraw	Call with counsel & team	9/28/2021	0.7	255.00	178.50	Legal - Case Administration
Josh McGraw	Call with JBH, RLD, GBW to discuss financial records	9/28/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with investor	9/28/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Email to counsel	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with CPA and email follow-up	9/28/2021	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to GBW regarding CPA inquiry	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Conference call coordination	9/28/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Updates to task list	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Report outline review	9/28/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Email with investor	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Meeting with counsel to determine next steps	9/28/2021	0.7	255.00	178.50	Legal - Case Administration
Renee Diefenderfer	Meeting with GBW, JBH, and JPM regarding next steps on action items	9/28/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Update to website for conference call	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email with contact from form on website	9/28/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Email with BK requesting paperwork	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Questions preparation for conference call	9/28/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Updates to contact sheet	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email with investor	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Email to registration form contact	9/28/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Forensic Accounting -payroll	9/29/2021	0.5	255.00	127.50	Financial - Forensic Accounting
Ysabel Willits	WC index	9/29/2021	2.8	150.00	420.00	Financial - Forensic Accounting
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	9/29/2021	10.2	340.00	3,468.00	Legal - Case Administration
John Hall	Field work in LVNV; investor call; interview with party re case; NV Energy at warehouse;	9/29/2021	10.2	310.00	3,162.00	Legal - Case Administration
Josh McGraw	Call with RLD about the investor call	9/29/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Conference call with all investors	9/29/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Create an account and review statements for COX, sent GBW an message	9/29/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with COX	9/29/2021	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Emails to GBW, JBH and legal council	9/29/2021	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Review insurance policy and research	9/29/2021	1.8	255.00	459.00	Legal - Case Administration
Josh McGraw	Review real estate proposals	9/29/2021	0.7	255.00	178.50	Legal - Case Administration
Renee Diefenderfer	Communication with defendant regarding paperwork	9/29/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Questions and outline review and follow up for conference call	9/29/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Investor email communication	9/29/2021	0.3	255.00	76.50	Legal - Case Administration
Renee Diefenderfer	Meeting with JPM regarding tasks	9/29/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Check documentation task per JBH request	9/29/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with JBH regarding electricity shut off	9/29/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Call with utility company regarding payment arrangements and service and follow up communication to JBH	9/29/2021	0.5	255.00	127.50	Legal - Case Administration
Renee Diefenderfer	Conference call with GBW	9/29/2021	0.5	255.00	127.50	Legal - Case Administration

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Renee Diefenderfer	Text communication with investor	9/29/2021	0.1	255.00	25.50	Legal - Case Administration
Renee Diefenderfer	Update to website and report	9/29/2021	1.0	255.00	255.00	Legal - Case Administration
Renee Diefenderfer	Phone troubleshooting	9/29/2021	0.6	255.00	153.00	Legal - Case Administration
Renee Diefenderfer	Call with GBW regarding phone and website	9/29/2021	0.2	255.00	51.00	Legal - Case Administration
Geoff Winkler	Meetings onsite, review operations, meeting with workers, meeting with third parties, calls with third parties, investors	9/30/2021	4.5	340.00	1,530.00	Legal - Case Administration
John Hall	Field work in LVNV; work with ADT; composing memo and emails to team on return flight, file management for case	9/30/2021	4.5	310.00	1,395.00	Legal - Case Administration
Josh McGraw	Create real estate summary	9/30/2021	0.7	255.00	178.50	Legal - Case Administration
Josh McGraw	Email to JBH about insurance policy review	9/30/2021	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Emails to investors	9/30/2021	0.2	255.00	51.00	Legal - Case Administration
Renee Diefenderfer	Preparation of transcribed document from conference call	9/30/2021	2.0	255.00	510.00	Legal - Case Administration
Renee Diefenderfer	Emails to investors	9/30/2021	1.3	255.00	331.50	Legal - Case Administration
Renee Diefenderfer	Call with GBW regarding communication for question from investor	9/30/2021	0.1	255.00	25.50	Legal - Case Administration
Totals			975.3		\$ 285,822.90	

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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	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Accounting/Auditing	John Hall	AFS	16.2	310.00	\$ 5,022.00	
Financial - Accounting/Auditing	Michelle Priddy	AFS	0.0	289.00	\$ -	
Financial - Accounting/Auditing	Renee Diefenderfer	AFS	0.0	255.00	\$ -	
Financial - Accounting/Auditing	Josh McGraw	AFS	0.0	255.00	\$ -	
Financial - Accounting/Auditing	Ysabel Willits	AFS	5.3	150.00	\$ 795.00	
			<u>21.5</u>		<u>\$ 5,817.00</u>	
Financial - Data Analysis	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Data Analysis	John Hall	AFS	0.0	310.00	\$ -	
Financial - Data Analysis	Michelle Priddy	AFS	0.0	289.00	\$ -	
Financial - Data Analysis	Renee Diefenderfer	AFS	0.0	255.00	\$ -	
Financial - Data Analysis	Josh McGraw	AFS	10.4	255.00	\$ 2,652.00	
Financial - Data Analysis	Ysabel Willits	AFS	0.0	150.00	\$ -	
			<u>10.4</u>		<u>\$ 2,652.00</u>	
Financial - Forensic Accounting	Personnel	Firm	Hours	Rate	Amount	
Financial - Forensic Accounting	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Forensic Accounting	John Hall	AFS	22.3	310.00	\$ 6,913.00	
Financial - Forensic Accounting	Michelle Priddy	AFS	0.0	289.00	\$ -	
Financial - Forensic Accounting	Renee Diefenderfer	AFS	0.0	255.00	\$ -	
Financial - Forensic Accounting	Josh McGraw	AFS	31.1	255.00	\$ 7,930.50	
Financial - Forensic Accounting	Ysabel Willits	AFS	7.4	150.00	\$ 1,110.00	
			<u>60.8</u>		<u>\$ 15,953.50</u>	
Legal - Asset Analysis and Recovery	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Analysis and Recovery	Geoff Winkler	AFS	5.0	340.00	\$ 1,700.00	
Legal - Asset Analysis and Recovery	John Hall	AFS	0.9	310.00	\$ 279.00	
Legal - Asset Analysis and Recovery	Michelle Priddy	AFS	146.6	289.00	\$ 42,367.40	
Legal - Asset Analysis and Recovery	Renee Diefenderfer	AFS	2.6	255.00	\$ 663.00	
Legal - Asset Analysis and Recovery	Josh McGraw	AFS	0.0	255.00	\$ -	
Legal - Asset Analysis and Recovery	Ysabel Willits	AFS	0.0	150.00	\$ -	
			<u>155.1</u>		<u>\$ 45,009.40</u>	
Legal - Asset Disposition	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Disposition	Geoff Winkler	AFS	0.0	340.00	\$ -	
Legal - Asset Disposition	John Hall	AFS	1.5	310.00	\$ 465.00	
Legal - Asset Disposition	Michelle Priddy	AFS	0.0	289.00	\$ -	
Legal - Asset Disposition	Renee Diefenderfer	AFS	0.0	255.00	\$ -	
Legal - Asset Disposition	Josh McGraw	AFS	0.0	255.00	\$ -	
Legal - Asset Disposition	Ysabel Willits	AFS	0.0	150.00	\$ -	
			<u>1.5</u>		<u>\$ 465.00</u>	
Legal - Business Operations	Personnel	Firm	Hours	Rate	Amount	
Legal - Business Operations	Geoff Winkler	AFS	30.2	340.00	\$ 10,268.00	

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Legal - Business Operations	John Hall	AFS	0.6	310.00	\$ 186.00	
Legal - Business Operations	Michelle Priddy	AFS	0.0	289.00	\$ -	
Legal - Business Operations	Renee Diefenderfer	AFS	0.0	255.00	\$ -	
Legal - Business Operations	Josh McGraw	AFS	0.0	255.00	\$ -	
Legal - Business Operations	Ysabel Willits	AFS	0.0	150.00	\$ -	
			<u>30.8</u>		<u>\$ 10,454.00</u>	
Legal - Case Administration	Personnel	Firm	Hours	Rate	Amount	
Legal - Case Administration	Geoff Winkler	AFS	246.0	340.00	\$ 83,640.00	
Legal - Case Administration	John Hall	AFS	169.7	310.00	\$ 52,607.00	
Legal - Case Administration	Michelle Priddy	AFS	0.0	289.00	\$ -	
Legal - Case Administration	Renee Diefenderfer	AFS	143.5	255.00	\$ 36,592.50	
Legal - Case Administration	Josh McGraw	AFS	116.5	255.00	\$ 29,707.50	
Legal - Case Administration	Ysabel Willits	AFS	19.5	150.00	\$ 2,925.00	
			<u>695.2</u>		<u>\$ 205,472.00</u>	

Overall Summary						
Totals	Personnel	Firm	Hours	Rate	Amount	
	Geoff Winkler	AFS	281.2	340.00	\$ 95,608.00	
	John Hall	AFS	211.2	310.00	\$ 65,472.00	
	Michelle Priddy	AFS	146.6	289.00	\$ 42,367.40	
	Renee Diefenderfer	AFS	146.1	255.00	\$ 37,255.50	
	Josh McGraw	AFS	158.0	255.00	\$ 40,290.00	
	Ysabel Willits	AFS	32.2	150.00	\$ 4,830.00	
			<u>975.3</u>		<u>\$ 285,822.90</u>	
	TOTAL FEES		975.3		\$ 285,822.90	

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Summary of Expenses of Receiver and Retained Personnel
August 6, 2021 - September 30, 2021

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Michelle Priddy	Alaska Airlines	Airfare	08/07/21	469.79	Airfare
Geoff Winkler	LAZ Parking	Parking	08/09/21	15.00	Parking
John Hall	Alaska Airlines	Airfare	08/09/21	498.79	Airfare
Geoff Winkler	GoDaddy	Website domain	08/10/21	55.22	Internet/Online Fees
Geoff Winkler	GoDaddy	Website hosting	08/10/21	83.88	Internet/Online Fees
John Hall	Marriott	Lodging	08/13/21	1,389.81	Hotel
John Hall	Marriott	Parking	08/13/21	100.00	Parking
Geoff Winkler	Marriott	Lodging	08/13/21	1,131.53	Hotel
Geoff Winkler	AFS	Per diem meals	08/13/21	335.50	Individual Meals
John Hall	AFS	Per diem meals	08/13/21	335.50	Individual Meals
Michelle Priddy	AFS	Per diem meals	08/13/21	335.50	Individual Meals
Michelle Priddy	Port of Portland	Parking	08/14/21	129.00	Parking
Michelle Priddy	Alaska Airlines	Airfare	08/15/21	422.81	Airfare
Geoff Winkler	Alaska Airlines	Airfare	08/15/21	422.81	Airfare
John Hall	National	Car Rental	08/16/21	590.76	Car Rental
Michelle Priddy	Marriott	Lodging	08/16/21	1,146.28	Hotel
Renee Diefenderfer	Alaska Airlines	Airfare	08/18/21	415.80	Airfare
Renee Diefenderfer	USPS	Postage	08/19/21	3.20	Courier/Shipping/Freight
Josh McGraw	Alaska Airlines	Airfare	08/22/21	455.80	Airfare
Geoff Winkler	Lyft	Transportation	08/22/21	45.76	Taxi
Josh McGraw	Lyft	Transportation	08/22/21	26.07	Taxi
Geoff Winkler	Port of Portland	Parking	08/22/21	129.00	Parking
Renee Diefenderfer	LAZ Parking	Parking	08/23/21	25.00	Parking
Geoff Winkler	Walgreens	COVID Test	08/25/21	52.00	Miscellaneous
Michelle Priddy	Walgreens	COVID Test	08/25/21	52.00	Miscellaneous
Geoff Winkler	Alaska Airlines	Airfare	08/26/21	395.81	Airfare
Renee Diefenderfer	Marriott	Lodging	08/27/21	918.37	Hotel
Josh McGraw	Marriott	Lodging	08/27/21	918.37	Hotel
Michelle Priddy	Marriott	Lodging	08/27/21	1,035.15	Hotel
Geoff Winkler	Marriott	Lodging	08/27/21	1,035.15	Hotel
Geoff Winkler	Marriott	Parking	08/27/21	100.00	Parking
Geoff Winkler	McCarran Airport	Parking	08/27/21	54.00	Parking
Josh McGraw	Port of Portland	Parking	08/27/21	69.00	Parking
Geoff Winkler	AFS	Per diem meals	08/27/21	335.50	Individual Meals
Michelle Priddy	AFS	Per diem meals	08/27/21	335.50	Individual Meals
Josh McGraw	AFS	Per diem meals	08/27/21	335.50	Individual Meals
Renee Diefenderfer	AFS	Per diem meals	08/27/21	335.50	Individual Meals

SEC v. Profit Connect Wealth Services, Inc. et al.
Summary of Expenses of Receiver and Retained Personnel
August 6, 2021 - September 30, 2021

Attachment 2

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Geoff Winkler	Home Depot	Supplies for warehouse	08/30/21	22.63	Miscellaneous
Geoff Winkler	GoDaddy	Website upgrade	09/01/21	114.48	Internet/Online Fees
Geoff Winkler	USPS	Postage	09/01/21	539.81	Courier/Shipping/Freight
Geoff Winkler	Marriott	Lodging	09/03/21	793.65	Hotel
Geoff Winkler	Marriott	Parking	09/03/21	100.00	Parking
Geoff Winkler	AFS	Per diem meals	09/03/21	335.50	Individual Meals
Geoff Winkler	Alaska Airlines	Airfare	09/22/21	632.61	Airfare
John Hall	Alaska Airlines	Airfare	09/22/21	632.61	Airfare
John Hall	Home Depot	Supplies for warehouse	09/27/21	6.46	Miscellaneous
John Hall	Home Depot	Supplies for warehouse	09/27/21	29.28	Miscellaneous
John Hall	ADT Alarm	Warehouse alarm install	09/29/21	1,200.00	Miscellaneous
John Hall	Uber	Transportation	09/30/21	50.24	Taxi
Geoff Winkler	Marriott	Lodging	09/30/21	459.70	Hotel
John Hall	Marriott	Lodging	09/30/21	459.70	Hotel
Geoff Winkler	AFS	Per diem meals	09/30/21	213.50	Individual Meals
John Hall	AFS	Per diem meals	09/30/21	213.50	Individual Meals
Total				\$ 20,338.33	

	GBW	JBH	MAP	JPM	RLD	Total
Airfare	1,451.23	1,131.40	892.60	455.80	415.80	4,346.83
Car Rental	-	590.76	-	-	-	590.76
Courier/Shipping/Freight	539.81	-	-	-	3.20	543.01
Hotel	3,420.03	1,849.51	2,181.43	918.37	918.37	9,287.71
Individual Meals	1,220.00	549.00	671.00	335.50	335.50	3,111.00
Internet/Online Fees	253.58	-	-	-	-	253.58
Miscellaneous	74.63	1,235.74	52.00	-	-	1,362.37
Parking	398.00	100.00	129.00	69.00	25.00	721.00
Taxi	45.76	50.24	-	26.07	-	122.07
Total	7,403.04	5,506.65	3,926.03	1,804.74	1,697.87	20,338.33

SEC v. Profit Connect Wealth Services, Inc. et al.
Receivership Estate Balance Sheet
August 6, 2021 - September 30, 2021

Attachment 3

Assets:		Liabilities:	
Cash	\$ 4,222,092	State/Federal Taxes ⁴	\$ -
Loan Receivable	\$ -	Property Taxes ⁴	\$ -
Marketable Securities	\$ -	Total Liabilities	\$ -
Cryptocurrency ⁶	\$ 4,069,949		
Real Property ¹	\$ 1,600,000	Claims:1	
Personal Property ¹	\$ 1,100,000	Investors ⁵	\$ -
Private Equity Investments ¹	\$ -	Creditors ⁵	\$ -
Existing Litigation ^{2,3}	\$ -		
Third Party Litigation ^{2,3}	\$ 3,200,000	Total Claims	\$ -
Professional Liability Litigation ^{2,3}	\$ 5,000,000		
Total Assets	\$ 19,192,041	Total Liabilities plus Claims	\$ -

-
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.
 6. The cryptocurrency was not received until after the date of this report, but was included to inform the parties.

**SEC v. Profit Connect Wealth Services, Inc. et al.
Receiver's Cash Receipts and Disbursements
August 6, 2021 - September 30, 2021**

Attachment 4

Beginning Balance of Cash in Receivership Estate on August 6, 2021	\$ -
Deposits:	\$ 4,737,376.56
Payments:	\$ (515,284.46)
Ending Balance of Cash in Receivership Estate on September 30, 2021	<u>\$ 4,222,092.10</u>

EXHIBIT "2"

1 Maria A. Gall, Esq.
Nevada Bar No. 14200
2 BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
3 Las Vegas, Nevada 89135
Telephone: (702) 471-7000
4 Facsimile: (702) 471-7070
gallm@ballardspahr.com

5 Kyra E. Andrassy, Esq.
6 Admitted *Pro Hac Vice*
SMILEY WANG-EKVALL, LLP
7 3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
8 Telephone: (714) 445-1000
Facsimile: (714) 445-1002
9 kandrassy@swelawfirm.com

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

11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

19 Defendants.

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

**DECLARATION OF MARIA A. GALL,
ESQ. IN SUPPORT OF APPLICATION
FOR ALLOWANCE AND PAYMENT
OF FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM AUGUST 7, 2021, THROUGH
SEPTEMBER 30, 2021**

20
21
22 I, Maria A. Gall, Esq. declare as follows:

23 1. I am over 21 years old and an attorney with and partner of Ballard
24 Spahr LLP, based in its Las Vegas, Nevada office. I am licensed Nevada attorney,
25 with additional licenses in New York, Kentucky, and Tennessee.

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

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

4 3. Attached to this declaration is a true and correct copy of the invoice for
5 the services of my firm for the period from August 7, 2021, through September 30,
6 2021 (the "Application Period").

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

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

15 6. For the professionals who record their time using written time sheets,
16 the information contained in the time sheets is transcribed into the firm's computer
17 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
20 rendered. The firm's computer billing system automatically multiplies the time
21 expended by each professional by the respective professional's billing rate to calculate
22 the amount of the fee. The firm conducts its business in reliance on the accuracy of
23 such business records.

24 8. As reflected in the attached invoice, and pursuant to the Receivership
25 Order (ECF No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46),
26 professionals at Ballard Spahr assisted the Receiver as follows during the Application
27 Period:
28

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

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

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- a. issued and enforced subpoenas to various entities in an effort to track, trace, and recover Profit Connect assets;
- b. liaised and negotiated with counsel for third party custodians of Profit Connect assets to ensure such assets were properly transferred to the Receiver’s control;
- c. investigated, analyzed, and drafted necessary documents to ensure Profit Connect property was properly preserved for transfer to the Receiver;
- d. liaised and negotiated with counsel for investors on their putative class actions and other litigation to recoup monies outside the receivership; and
- e. ensured Profit Connect employees were properly terminated in connection with the cessation of business operations and that their employee benefits were properly addressed.

9. Ballard Spahr has agreed to discount its standard billing rates in connect with this matter by 15 percent, and the fees being requested in this Application reflect this reduction.

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

Executed on November 1, 2021.

/s/ Maria A. Gall



We would like to request that payments be made either by WIRE or ACH. Please see our payment options below.

Account Wiring and ACH Instructions:

Bank: PNC Bank, Philadelphia
Address: 1600 Market Street, Philadelphia, PA 19103
ABA# : 031 0000 53
Account Name: Ballard Spahr LLP
Account Number: 85-3131-7345
SWIFT Code: PNCCUS33 (only needed for international wires)

For your convenience, we now offer a secure online invoice payment link which gives you the flexibility to pay online and monitor all payments made to Ballard Spahr.

Online Secure Payer Express Link – ACH Payments

<https://ww2.payerexpress.com/ebp/BallardSpahr/Login/Index>

If you are unable to pay electronically, please remit payment to our new lockbox address.

Check Remittance Lockbox Address:

Ballard Spahr LLP
P O Box 825470
Philadelphia, PA 19182 5470

If you have any questions or need assistance, please call us at 215-864-8350 or email directly at clientaccountservices@ballardspahr.com.



TAX IDENTIFICATION NO: 23-0382195

One Summerlin
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135-2958
Tel 702.471.7000
Fax 702.471.7070

Geoff Winkler
American Fiduciary Services LLC
75 NW Hoyst St #4364
Portland, OR 97208

September 12, 2021
Invoice No. 20210901990

Client: Winkler, Geoff (082085.00)
Matter: Confidential (00373080)

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2021

INVOICE SUMMARY

Professional Fees	\$17,981.00
Less 15.0% Discount	(\$2,697.15)
Net Fees	\$15,283.85
Disbursements	\$193.00
Total Invoice Amount	\$15,476.85
Previous Balance Due	\$10,489.00
Total Amount Due	\$25,965.85

082085.00 - 00373080
Maria A. GallSeptember 12, 2021
Invoice No. 20210901990

Professional Services

Attorney	Date	Description	Rate	Hours	Amount
AAR - Asset Analysis and Recovery					
Gall,M.A.	08/09/21	Attention to issues surrounding Bank of America transfer of funds to fiduciary account, including telephone conference with J. Ball (counsel for Bank) re: same; multiple email correspondence with receiver team re: same; and review and analyze applicable injunction provisions to release of funds	495.00	0.70	346.50
Gall,M.A.	08/09/21	Email correspondence to Coinbase re: transfer of account to receiver	495.00	0.10	49.50
Gall,M.A.	08/09/21	Attention to employee loans made by Profit Connect, including e-mail correspondence with G. Winkler re: same, preliminary research re: property purchased by R. Uriarte with purported loan, and coordinate with assistant on obtaining recorded documents on property	495.00	0.30	148.50
Gall,M.A.	08/10/21	Multiple email correspondence with Coinbase re: transfer of account to G. Winkler	495.00	0.20	99.00
Gall,M.A.	08/10/21	Review GoDaddy stipulation to ensure compliance with local rules and email correspondence to K. Andrassy re: requirement on signatures and participation by all parties	495.00	0.10	49.50
Gall,M.A.	08/10/21	Email correspondence with SEC and Kovar counsel re: stipulation and order concerning GoDaddy	495.00	0.10	49.50
Gall,M.A.	08/11/21	Email follow-up to M. Cianfrani at Coinbase re: transfer of Profit Connect account to Receiver	495.00	0.10	49.50
Gall,M.A.	08/11/21	Email correspondence with G. Winkler and K. Andrassy re: legal options on home purchased by Profit Connect employee using transferred funds	495.00	0.10	49.50

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 Maria A. Gall

September 12, 2021
 Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	08/11/21	Attention to extended letter and subpoena to D. Hayes re: demand for Profit Connect client file, including draft same, research re: Nevada law on scope of demand for same, and coordinate with assistant on serving and sending same	495.00	2.20	1,089.00
Gall,M.A.	08/11/21	Multiple email correspondence with J. Ball re: order modifying receivership order and re: Bank of America unfreezing of assets at Receiver's direction	495.00	0.20	99.00
Gall,M.A.	08/11/21	Email correspondence to D. Markert, real estate specialist, re: options to transfer home from Profit Connect employee to Profit Connect	495.00	0.10	49.50
Gall,M.A.	08/11/21	Attention to finalization of stipulation and order regarding domain names, including finalize same and execute after-hours filing of same (post 6 pm) given absence of clerical staff (timeliness of SAO important because of need to redirect investors to correct website)	495.00	0.40	198.00
Gall,M.A.	08/12/21	Multiple email correspondence with G. Winkler and J. Hall re: subpoena of accountants' client-files	495.00	0.20	99.00
Gall,M.A.	08/12/21	Email correspondence with J. Nudelman (counsel for Profit Connect landlord) re: lease	495.00	0.10	49.50
Gall,M.A.	08/12/21	Email correspondence with J. Ball (counsel for Bank of America) re: liquidation check from Profit Connect accounts	495.00	0.10	49.50
Gall,M.A.	08/13/21	Attention to liquidation check from Bank of America, including coordinate with staff on securing same and multiple communications with G. Winkler re: depositing of same	495.00	0.30	148.50
Gall,M.A.	08/13/21	Draft subpoena and accompanying letter to P. Jenson; forward to G. Winkler, et al. for their review	495.00	0.80	396.00
Gall,M.A.	08/13/21	Draft subpoena and accompanying letter to D. Mahoney; forward to G. Winkler, et al. for their review	495.00	0.80	396.00

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 Maria A. Gall

September 12, 2021
 Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	08/13/21	Email correspondence with D. Hayes re: production of client-file for Profit Connect	495.00	0.10	49.50
Gall,M.A.	08/16/21	Attention to deposit of Bank of America check into fiduciary's account, including travel to and from bank	495.00	1.00	495.00
Gall,M.A.	08/16/21	Review documents provided by D. Hales (former Profit Connect attorney) and respond to his email re: further documents and subpoena compliance date	495.00	0.50	247.50
Gall,M.A.	08/16/21	Revise subpoenas and accompanying letters to Profit Connect accountants and coordinate with assistant on service of same	495.00	0.30	148.50
Gall,M.A.	08/16/21	Briefly review order on domain name stipulation and circulate to G. Winkler, et al.	495.00	0.10	49.50
Gall,M.A.	08/17/21	Review email response from D. Markert re: legal implications of transfer of home from Profit Connect employee to Profit Connect	495.00	0.20	99.00
Gall,M.A.	08/18/21	Attention to second subpoena to P. Jensen re: supporting materials for B. Kovar income, including email correspondence with J. Hall re: content of same, draft notice of subpoena for counsel of record, coordinate with assistant on service of subpoena and notice, review materials forwarded by P. Jensen in response to subpoena, forward materials to team and counsel of record	495.00	1.00	495.00
Gall,M.A.	08/18/21	Email correspondence with D. Mahoney re: his response to subpoena for documents re: Profit Connect and the Kovars' income	495.00	0.10	49.50
Gall,M.A.	08/19/21	Multiple email correspondence with S. Lewis of Town Square re: Profit Connect lease of property and landlord's intent to terminate same	495.00	0.20	99.00

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 Maria A. Gall

September 12, 2021
 Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	08/19/21	Communications and coordination with office services team on delivery and location of documents produced by D. Mahoney in response to subpoena given USPS failure to deliver	495.00	0.20	99.00
Gall,M.A.	08/20/21	Review and analyze voicemail message from D. Hayes re: production of documents responsive to subpoena; respond to D. Hayes re: same	495.00	0.10	49.50
Gall,M.A.	08/23/21	Email correspondence with D. Hales re: his preparation of Profit Connect materials for our review	495.00	0.10	49.50
Gall,M.A.	08/24/21	Attention to Profit Connect documents and emails produced by Dale Hayes in response to subpoena, including brief review of emails, forward to same to receiver, and forward same to Stroz Friedberg for uploading to document management system	495.00	0.50	247.50
Gall,M.A.	08/24/21	Email correspondence with accountant Dan Mahoney re: production of Profit Connect Quickbooks files in his possession	495.00	0.10	49.50
Gall,M.A.	08/25/21	Attention to landlord's demand for rent on 6955 Speedway warehouse, including correspondence with G. Winkler re: same, confer with K. Andrassy re: implications of same, and email correspondence with landlord re: same and requesting reduction in rent given receivership	495.00	0.50	247.50
Gall,M.A.	08/25/21	Attention to Quickbooks files received from D. Mahoney in connection with subpoena, including forward same with J. Hall and correspondence with J. Hall re: same	495.00	0.20	99.00
Gall,M.A.	08/25/21	Attention to issues with Town Square move-out and landlord, including telephone conference with landlord re: move-out and follow-up with G. Winkler re: same	495.00	0.30	148.50

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 Maria A. Gall

September 12, 2021
 Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	08/26/21	Attention to 6955 Speedway landlord's demand for payment, including email correspondence with J. Nudelman (landlord's attorney) re: same and email correspondence with G. Winkler re: same	495.00	0.30	148.50
Gall,M.A.	08/26/21	Email correspondence with G. Winkler and K. Andrassy re: investors who sent in money after the freeze order	495.00	0.20	99.00
Gall,M.A.	08/26/21	Telephone conference with G. Winkler re: investor/agent meeting and threatened class action lawsuit	495.00	0.20	99.00
Total AAR				13.10	6,484.50
BusinessOP - Business Operations					
Gall,M.A.	08/09/21	Attention to termination of D. Hayes as Profit Connect counsel, including research applicable RPC rules to termination of representation and former clients, draft letter, and coordinate with assistant on sending same to D. Hayes	495.00	1.00	495.00
Gall,M.A.	08/11/21	Telephone conference with J. Hall re: conversion of certain employees to independent contractor status	495.00	0.20	99.00
Gall,M.A.	08/11/21	Draft independent contractor agreement for Receiver to use to retain services of certain anticipated former employees; forward to K. Andrassy for her input on forum selection clause in light of receivership	495.00	1.00	495.00
Gall,M.A.	08/11/21	Telephone conference with D. Hayes re: his withdrawal as Kovar's counsel and re: his transfer of monies held in IOLTA account to receiver	495.00	0.30	148.50
Gall,M.A.	08/11/21	Telephone conference with G. Winkler re: D. Hayes withdrawal as attorney and next steps	495.00	0.10	49.50
Gall,M.A.	08/12/21	Attention to termination of employees, including telephone conference with G. Winkler re: same and draft termination email for G. Winkler use re: same	495.00	0.80	396.00
Gall,M.A.	08/16/21	Revise consulting services agreement for former employees based on emails with K. Andrassy	495.00	0.60	297.00

082085.00 - 00373080
 Maria A. Gall

September 12, 2021
 Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Total BusinessOP				4.00	1,980.00
CaseAdm - Case Administration					
Gall,M.A.	08/10/21	Review and edit stipulation modifying receivership order drafted by K. Andrassy to ensure conformity to Nevada rules and practice	495.00	0.30	148.50
Gall,M.A.	08/10/21	Draft motion to employ professionals and revert to K. Andrassy for input on portions re: her law firm	495.00	2.50	1,237.50
Gall,M.A.	08/10/21	Coordinate with assistant on filing K. Andrassy pro hac vice motion	495.00	0.10	49.50
Gall,M.A.	08/10/21	Email correspondence to other counsel re: stipulation to clarify receivership order	495.00	0.10	49.50
Gall,M.A.	08/11/21	Review notice to investors drafted by K. Andrassy and provide brief comments based on Nevada law	495.00	0.10	49.50
Gall,M.A.	08/11/21	Attention to finalizing motion to employ, including draft supporting declarations for myself and S. Kopelev in support of motion to employ, coordinate exhibits, incorporate edits from K. Andrassy and S. Kopelev, draft proposed order, and coordinate with assistant on filing the same	495.00	2.30	1,138.50
Gall,M.A.	08/16/21	Email correspondence with S. Kopelev of Stroz Friedberg re: document repositories	495.00	0.20	99.00
Gall,M.A.	08/17/21	Draft notice of subpoena for first Jensen and Mahoney subpoenas and forward to all counsel of record	495.00	0.20	99.00
Gall,M.A.	08/17/21	Attention to supplemental subpoena to Paul Jensen for further information re: B. Kovar income sources, including multiple email correspondence with J. Hall re: same, review P. Jensen's initial production of B. Kovar information in connection with same, draft supplemental subpoena and accompanying letter and forward to J. Hall for his review and approval	495.00	1.00	495.00

082085.00 - 00373080
 Maria A. Gall

September 12, 2021
 Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	08/20/21	Review and revise fee application and supporting declarations to ensure conformity with local rules and practice; coordinate with assistant on filing the same	495.00	1.00	495.00
Gall,M.A.	08/24/21	Finalize fee application after obtaining SEC non-opposition approval, including final non-substantive edits and ensuring conformity of all supporting exhibits, and coordinate with assistant on drafting the same; draft and file errata to same (.1)	495.00	0.80	396.00
Total CaseAdm				8.60	4,257.00
DataAnalys - Data Analysis					
Markert,D.	08/17/21	Research Nevada law and administrative code re: real property transfer tax exemptions, especially per bankruptcy or receivership conveyance; research Clark County records per subject real property, especially per prior lien considerations; draft correspondence memo re: research and issues for follow-up consideration	410.00	1.20	492.00
Total DataAnalys				1.20	492.00
EmplBenef - Employee Benefits/Pensions					
Gall,M.A.	08/10/21	Telephone conference with G. Winkler and J. Hall re: health insurance issues	495.00	0.20	99.00
Gall,M.A.	08/10/21	Telephone conference with G. Winkler re: Coinbase information request	495.00	0.10	49.50
Gall,M.A.	08/11/21	Review email correspondence from broker/carrier terminating Profit Connect group health policy and forward to G. Winkler, et al. with comments on legal implications of same	495.00	0.20	99.00
Gall,M.A.	08/12/21	Attention to termination of health insurance, including email correspondence with T. Thomas of Employee Benefit Solutions re: same and telephone conference with L. Ford re: same	495.00	0.30	148.50
Gall,M.A.	08/13/21	Email correspondence with L. Ford at Employee Benefits Solutions re: notification to employees re: right to apply for individual coverage	495.00	0.10	49.50

082085.00 - 00373080
Maria A. GallSeptember 12, 2021
Invoice No. 20210901990

Attorney	Date	Description	Rate	Hours	Amount
Leeds,E.I.	08/16/21	Review/analysis COBRA and conversion rights for group health coverage that is terminating	795.00	1.40	1,113.00
Gall,M.A.	08/16/21	Attention to health insurance termination notice issues, including multiple emails with E. Leeds re: same and emails with G. Winkler to confirm information for same	495.00	0.50	247.50
Jones,G.	08/16/21	Analyze Nevada conversion laws related to group health plans and individual health plans; review COBRA regulations	455.00	2.30	1,046.50
Leeds,E.I.	08/17/21	Review/analysis notice of termination of health coverage	795.00	0.30	238.50
Gall,M.A.	08/17/21	Telephone conference with E. Leeds and G. Jones re: notices to employees re: termination of health insurance and vision and dental insurance	495.00	0.30	148.50
Jones,G.	08/17/21	Review conversion laws for Nevada; prepare termination letter	455.00	1.50	682.50
Leeds,E.I.	08/19/21	Analysis and preparation/draft letter on termination of coverage	795.00	0.20	159.00
Gall,M.A.	08/19/21	Review employee benefits termination notice drafted by G. Jones and forward to receiver for his noticing of employees	495.00	0.10	49.50
Jones,G.	08/19/21	Prepare draft notification to terminating employees	455.00	1.40	637.00
Total EmplBenef				8.90	4,767.50
Total Fees				35.80	\$17,981.00
Less 15.0% Discount					(\$2,697.15)

082085.00 - 00373080
Maria A. Gall

September 12, 2021
Invoice No. 20210901990

Summary of Professional Fees

Attorney	Billed Hours	Billed Rate	Billed Amount
Gall,M.A.	27.50	495.00	13,612.50
Markert,D.	1.20	410.00	492.00
Leeds,E.I.	1.90	795.00	1,510.50
Jones,G.	5.20	455.00	2,366.00
Total Fees	35.80		\$17,981.00
Less 15.0% Discount			(\$2,697.15)

082085.00 - 00373080
Maria A. Gall

September 12, 2021
Invoice No. 20210901990

Disbursements

Date	Description	Amount
08/09/21	Delivery Service FedEx Invoice #: 746733549, 08/13/2021, Tracking #: 282376245157, Dale Hayes Jr, Hayes Wakayama, 4735 SOOUTH DURANO DR STE 105, LAS VEGAS, NV 89147	16.33
08/16/21	Delivery Service FedEx Invoice #: 747535899, 08/20/2021, Tracking #: 282620982752, Daniel Mahoney, INFORMATION NOT SUPPLIED, 2394 TAMIAMI TRL, PORT CHARLOTTE, FL 33952	19.44
08/16/21	Delivery Service FedEx Invoice #: 747535899, 08/20/2021, Tracking #: 282621847261, Paul Jensen, INFORMATION NOT SUPPLIED, 2001 16TH ST N, ST PETERSBURG, FL 33704	19.44
08/17/21	Service of Subpoena American Legal Investigation Services Nevada, Inc. - Inv #37038476 8/15/21 - Las Vegas process, runner and efilng services	137.79
Total Disbursements		\$193.00

082085.00 - 00373080
Maria A. Gall

September 12, 2021
Invoice No. 20210901990

Open Invoices as of September 12, 2021

Invoice Date	Invoice Number	Invoice Amount	Payments	Balance Due
08/19/21	20210804722	\$10,489.00	\$0.00	\$10,489.00
Total Outstanding AR:				\$10,489.00



TAX IDENTIFICATION NO: 23-0382195

One Summerlin
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135-2958
Tel 702.471.7000
Fax 702.471.7070

Geoff Winkler
American Fiduciary Services LLC
75 NW Hoyst St #4364
Portland, OR 97208

September 12, 2021
Invoice No. 20210901990

Client: Winkler, Geoff (082085.00)
Matter: Confidential (00373080)

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2021

REMITTANCE ADVICE

Professional Fees	\$17,981.00
Less 15.0% Discount	(\$2,697.15)
Net Fees	\$15,283.85
Disbursements	\$193.00
Total Invoice Amount	\$15,476.85
Previous Balance Due	\$10,489.00
Total Amount Due	\$25,965.85

For billing inquiries please send an email to CB@ballardspahr.com

Our Preferred Method for payment is ACH or Wire Transfer
<https://ww2.payerexpress.com/ebp/BallardSpahr/Login/Index>

For Payment by US mail:

Ballard Spahr LLP
P O Box 825470
Philadelphia, PA 19182 5470
Tel 702.471.7000

ACH and Wire Payment Instructions

Bank: PNC Bank, NA
1600 Market Street, Philadelphia, PA 19103
ABA No.: 031 0000 53
Account No.: 85-3131-7345
Account Name: Ballard Spahr LLP

Due and Payable Within 30 Days



We would like to request that payments be made either by WIRE or ACH. Please see our payment options below.

Account Wiring and ACH Instructions:

Bank: *PNC Bank, Philadelphia*
Address: *1600 Market Street, Philadelphia, PA 19103*
ABA# : *031 0000 53*
Account Name: *Ballard Spahr LLP*
Account Number: *85-3131-7345*
SWIFT Code: *PNCCUS33 (only needed for international wires)*

For your convenience, we now offer a secure online invoice payment link which gives you the flexibility to pay online and monitor all payments made to Ballard Spahr.

Online Secure Payer Express Link – ACH Payments

<https://ww2.payerexpress.com/ebp/BallardSpahr/Login/Index>

If you are unable to pay electronically, please remit payment to our new lockbox address.

Check Remittance Lockbox Address:

Ballard Spahr LLP
P O Box 825470
Philadelphia, PA 19182 5470

If you have any questions or need assistance, please call us at 215-864-8350 or email directly at clientaccounts@ballardspahr.com.



TAX IDENTIFICATION NO: 23-0382195

One Summerlin
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135-2958
Tel 702.471.7000
Fax 702.471.7070

Geoff Winkler
American Fiduciary Services LLC
75 NW Hoyst St #4364
Portland, OR 97208

October 15, 2021
Invoice No. 20211004945

Client: Winkler, Geoff (082085.00)
Matter: Confidential (00373080)

FOR PROFESSIONAL SERVICES RENDERED through September 30, 2021

INVOICE SUMMARY

Professional Fees	\$13,810.50
Less 15.0% Discount	(\$2,071.58)
Net Fees	\$11,738.92
Disbursements	\$1,215.89
Total Invoice Amount	\$12,954.81
Previous Balance Due	\$15,476.85
Total Amount Due	\$28,431.66

082085.00 - 00373080
Maria A. GallOctober 15, 2021
Invoice No. 20211004945

Professional Services

Attorney	Date	Description	Rate	Hours	Amount
AAR - Asset Analysis and Recovery					
Gall,M.A.	09/01/21	Attention to issues surrounding J. Guetterman and his attempts to call a class action, including multiple communications with G. Winkler re: same, research re: same, draft letter to J. Guetterman re: same, and coordinate with assistant on sending same to J. Guetterman	495.00	2.00	990.00
Gall,M.A.	09/09/21	Email correspondence with G. Winkler re: call with investor class action attorney J. Sonn; telephone conference with J. Sonn re: his anticipated class action on behalf of investors; and follow-up conference with G. Winkler re: steps moving forward	495.00	0.60	297.00
Gall,M.A.	09/13/21	Email correspondence with K. Andrassy re: recording of receivership order with Clark County Recorder and coordinate with A. Clark re: steps in accomplishing the same	495.00	0.10	49.50
Gall,M.A.	09/13/21	Telephone conference with J. Lujan at the Holley Driggs law firm, which represented a Profit Connect investor, re: need for documents and communications the firm may have re: Profit Connect; follow-up e-mail to R. Thompson, managing partner of the firm, re: same and re: subpoena	495.00	1.00	495.00
Gall,M.A.	09/13/21	Telephone conference with J. Perez of the Guerra law firm re: his experience with attorney seeking to bring a class action in connection with the Profit Connect scheme	495.00	0.50	247.50
Gall,M.A.	09/13/21	Review and account for all documents produced by third-party witnesses and ensure all documents have been (1) uploaded to document review platform and (2) produced to counsel for the parties, per court order; coordinate with Stroz Friedberg on both	495.00	1.50	742.50

082085.00 - 00373080
 Maria A. Gall

October 15, 2021
 Invoice No. 20211004945

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	09/13/21	Email correspondence with G. Winkler re: retention of broker to assist in disposing of residential real property belonging to Profit Connect	495.00	0.10	49.50
Gall,M.A.	09/13/21	Multiple communications with potential realtor/broker B. Ruddack re: receivership and potential need for realtor services to assist in sale of residential real property	495.00	0.20	99.00
Clark,A.	09/13/21	Pull order filed August 6, 2021 and forward to LAA with instructions to request certified copy of same in preparation for filing public notice of receivership with Clark County Recorder	315.00	0.50	157.50
Clark,A.	09/13/21	Draft subpoena and notice of same	315.00	0.40	126.00
Gall,M.A.	09/14/21	Video conference with receiver and legal team re: outstanding tasks	495.00	1.10	544.50
Gall,M.A.	09/14/21	Conference and follow-up emails with A. Clark re: subpoena to Holley Driggs	495.00	0.50	247.50
Clark,A.	09/14/21	Draft and edit body of subpoena to Holley Driggs Law Firm	315.00	1.70	535.50
Clark,A.	09/14/21	Meeting with M. Gall re subpoena to Holley Driggs Law Firm	315.00	0.30	94.50
Clark,A.	09/14/21	Draft notice of subpoena re document request from Holley Driggs	315.00	0.70	220.50
Gall,M.A.	09/15/21	Review subpoena to Holley Driggs drafted by associate A. Clark; provide comments and revisions to same	495.00	0.20	99.00
Gall,M.A.	09/15/21	Multiple email correspondence with associate A. Clark re: recording of receivership order with the Clark County Recorder and challenges in doing the same given recorder's system and information	495.00	0.20	99.00
Clark,A.	09/15/21	Input edits from M. Gall to Subpoena on Holley Driggs, LTD. and coordinate with assistant to serve subpoena on involved parties.	315.00	2.20	693.00

082085.00 - 00373080
 Maria A. Gall

October 15, 2021
 Invoice No. 20211004945

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	09/16/21	Attention to 7138 Calvert Cliffs loan by Profit Connect to R. Uriarte, including analyze potential options to recover loan in light of receiver's goals and e-mail correspondence with receiver team re: same	495.00	1.00	495.00
Gall,M.A.	09/16/21	Attention to Capital One subpoena, including multiple email correspondence with receiver team re: info for same and review and analyze documents collected to glean info needed	495.00	1.00	495.00
Gall,M.A.	09/17/21	Email correspondence with G. Winkler re: follow-up with Coinbase re: account access	495.00	0.10	49.50
Gall,M.A.	09/17/21	Multiple email correspondence with T. Hall (in-house counsel for Capital One) re: the receiver's anticipated subpoena	495.00	0.30	148.50
Gall,M.A.	09/19/21	Review email correspondence from K. Andrassy re: bankrtupcy considerations in plan for 7138 Calvert Cliffs property and respond to same with further considerations	495.00	0.20	99.00
Gall,M.A.	09/20/21	Email correspondence with K. Andrassy re: Calvert address for correspondence with B. Kovar re: vacating of house	495.00	0.10	49.50
Gall,M.A.	09/20/21	Extended email correspondence with A. Clark re: Capital One subpoena, including content needed for same	495.00	0.30	148.50
Clark,A.	09/20/21	Prepare subpoena to Capital One Bank, N.A.	315.00	1.70	535.50
Gall,M.A.	09/21/21	Attention to documents subpoenaed and received from third parties, including email correspondence with Stroz Friedberg re: accounting for all of the same and re: privilege review of Hayes documents prior to production to SEC and email correspondence with K. Andrassy confirming agreed approach to same	495.00	0.50	247.50

082085.00 - 00373080
 Maria A. Gall

October 15, 2021
 Invoice No. 20211004945

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	09/21/21	Telephone conference with T. Hall (in-house counsel for Capital One) re: information Capital One requires to expeditiously process the documents the receiver seeks to identify estate assets	495.00	0.50	247.50
Gall,M.A.	09/21/21	Review Capital One subpoena and notice of subpoena drafted by A. Clark, edit same, and forward same to receiver for comment	495.00	0.30	148.50
Gall,M.A.	09/21/21	Weekly conference with receivership team re: outstanding tasks, including on asset recovery, and steps moving forward	495.00	0.50	247.50
Gall,M.A.	09/22/21	Review and revise Capital One subpoena, notice of subpoena, and supporting documents drafted by A. Clark and coordinate with assistants on service of notice and forward subpoena to Capital One	495.00	1.00	495.00
Gall,M.A.	09/22/21	Email correspondence to J. Sonn re: his proposed class action complaint	495.00	0.10	49.50
Gall,M.A.	09/23/21	Preliminary research into entity governing B. Roshak (Profit Connect employee) police retirement and correspondence with A. Clark re: further research needed, all in connectino with B. Roshak claim that he provided corresponding value to the business by retiring early	495.00	0.50	247.50
Gall,M.A.	09/23/21	Attention to J. Sonn proposed class action, including review J. Sonn correspondence to potential class and email correspondence with G. Winkler re: same	495.00	0.30	148.50
Clark,A.	09/23/21	Draft and send email re recorded copy of Court's August 6, 2021 order appointing permanent receiver	315.00	0.20	63.00
Gall,M.A.	09/27/21	Email correspondence with A. Clark re: further research needed into who to serve at NVPERS with subpoena	495.00	0.10	49.50
Gall,M.A.	09/29/21	Review A. Clark research on subpoenaing NVPERS and email correspondence to NVPERS re: same	495.00	0.30	148.50

082085.00 - 00373080
Maria A. GallOctober 15, 2021
Invoice No. 20211004945

Attorney	Date	Description	Rate	Hours	Amount
Gall,M.A.	09/29/21	Meeting with G. Winkler and J. Hall re: next steps in asset recovery based on information thus far	495.00	1.20	594.00
Gall,M.A.	09/29/21	Multiple email correspondence with J. Sonn, attorney for proposed class action, re: the claims he proposes bringing	495.00	0.50	247.50
Gall,M.A.	09/29/21	Email correspondence with receiver and legal team re: J. Sonn emails	495.00	0.10	49.50
Gall,M.A.	09/29/21	Email correspondence to K. Andrassy re: information known re: truck purchased by Jocelyn with Profit Connect funds	495.00	0.10	49.50
Clark,A.	09/29/21	Research officer or employee authorized to accept service at Nevada Public Employees Retirement System	315.00	0.50	157.50
Clark,A.	09/29/21	Draft attachment to subpoena listing requested documents from Nevada Public Employees Retirement System	315.00	1.10	346.50
Clark,A.	09/29/21	Prepare affidavit authenticating documents produced by Public Employees' Retirement System	315.00	0.40	126.00
Clark,A.	09/29/21	Prepare notice of subpoena for subpoena duces tecum to Public Employees' Retirement System of Nevada	315.00	0.30	94.50
Clark,A.	09/29/21	Research privacy requirements for document requests to Nevada Public Employees' Retirement System	315.00	0.40	126.00
Clark,A.	09/30/21	Follow up with R. Thompson at Holley Driggs Law Firm re: September 29, 2021 subpoena deadline	315.00	0.10	31.50
Total AAR				27.50	11,722.50
BusinessOP - Business Operations					
Gall,M.A.	09/29/21	Email correspondence with counsel for Profit Connect landlord (J. Nudelman) re: warehouse occupancy	495.00	0.10	49.50
Total BusinessOP				0.10	49.50

082085.00 - 00373080
Maria A. GallOctober 15, 2021
Invoice No. 20211004945

Attorney	Date	Description	Rate	Hours	Amount
CaseAdm - Case Administration					
Gall,M.A.	09/20/21	Coordinate with assistants on obtaining video conference information from court for tomorrow's status conference	495.00	0.10	49.50
Gall,M.A.	09/20/21	Multiple email correspondence with receiver re: tomorrow's status conference with the court	495.00	0.20	99.00
Gall,M.A.	09/21/21	Attend case status conference with the Court on behalf of Receiver	495.00	0.60	297.00
Clark,A.	09/27/21	Investigate proper entity to serve subpoena re W. Roshak's Las Vegas Metro. Police Pension plan and research procedure to serve public entity	315.00	2.40	756.00
Clark,A.	09/30/21	Inspect documents 1-200 produced by Hayes Wakayama and identify privileged documents	315.00	1.40	441.00
Total CaseAdm				4.70	1,642.50
Claims Adm - Claims Administration and Objections					
Gall,M.A.	09/16/21	Email correspondence with receiver's team and with internal events team re: upcoming investor meeting re: case and claims	495.00	0.10	49.50
Gall,M.A.	09/17/21	Email correspondence with receiver team re: anticipated meeting with investors	495.00	0.20	99.00
Gall,M.A.	09/29/21	Attend receiver's call with investors re: status of case and claims process	495.00	0.50	247.50
Total Claims Adm				0.80	396.00
Total Fees				33.10	\$13,810.50
Less 15.0% Discount					(\$2,071.58)

082085.00 - 00373080
Maria A. Gall

October 15, 2021
Invoice No. 20211004945

Summary of Professional Fees

Attorney	Billed Hours	Billed Rate	Billed Amount
Gall,M.A.	18.80	495.00	9,306.00
Clark,A.	14.30	315.00	4,504.50
Total Fees	33.10		\$13,810.50
Less 15.0% Discount			(\$2,071.58)

082085.00 - 00373080
 Maria A. Gall

October 15, 2021
 Invoice No. 20211004945

Disbursements

Date	Description	Amount
08/18/21	Delivery Service FedEx Invoice #: 748238500, 08/27/2021, Tracking #: 282707411887, Paul Jensen, INFORMATION NOT SUPPLIED, 2001 16TH ST N, ST PETERSBURG, FL 33704	19.44
09/06/21	Filing Fees VISA_0921_2144_05 - COURTS/USDC-NV: 08/11/21; E-Filing Fee for: Motion/Verified Petition - Pro Hac Vice by Kyra E. Andrassy	250.00
09/07/21	Service of Subpoena American Legal Investigation Services Nevada, Inc.-Invoice#37038736-Dated 8/31/21-Process Service to Daniel Mahoney 8/16/21	183.65
09/07/21	Service of Subpoena American Legal Investigation Services Nevada, Inc.-Invoice#37038736-Dated 8/31/21-Process service to Daniel Mahoney 8/18/21	225.65
09/07/21	Service of Subpoena American Legal Investigation Services Nevada, Inc.-Invoice#37038736-Dated 8/31/21-Process service to Paul Jenson 8/16/21	225.65
09/13/21	Delivery Service Nationwide Legal Services, LLC-Invoice#00000033285-Dated 8/31/21-Delivery from Dale A. Hayes, Jr., Esq. to Ballard Spahr	15.00
09/13/21	Private Investigators Nighthawk Strategies LLC-Invoice#210852-Dated 8/23/21-Research and Investigative fees, July 2021	253.50
09/29/21	Delivery Service Nationwide Legal Services, LLC-Invoice#00000033862-Dated 9/15/21-Las Vegas -messenger service to United States District Court District of Nevada on 9/13/21	43.00
Total Disbursements		\$1,215.89

082085.00 - 00373080
Maria A. Gall

October 15, 2021
Invoice No. 20211004945

Open Invoices as of October 15, 2021

Invoice Date	Invoice Number	Invoice Amount	Payments	Balance Due
09/12/21	20210901990	\$15,476.85	\$0.00	\$15,476.85
Total Outstanding AR:				\$15,476.85



TAX IDENTIFICATION NO: 23-0382195

One Summerlin
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135-2958
Tel 702.471.7000
Fax 702.471.7070

Geoff Winkler
American Fiduciary Services LLC
75 NW Hoyst St #4364
Portland, OR 97208

October 15, 2021
Invoice No. 20211004945

Client: Winkler, Geoff (082085.00)
Matter: Confidential (00373080)

FOR PROFESSIONAL SERVICES RENDERED through September 30, 2021

REMITTANCE ADVICE

Professional Fees	\$13,810.50
Less 15.0% Discount	(\$2,071.58)
Net Fees	\$11,738.92
Disbursements	\$1,215.89
Total Invoice Amount	\$12,954.81
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Total Amount Due	\$28,431.66

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For Payment by US mail:

Ballard Spahr LLP
P O Box 825470
Philadelphia, PA 19182 5470
Tel 702.471.7000

ACH and Wire Payment Instructions

Bank: PNC Bank, NA
1600 Market Street, Philadelphia, PA 19103
ABA No.: 031 0000 53
Account No.: 85-3131-7345
Account Name: Ballard Spahr LLP

Due and Payable Within 30 Days

1 Maria A. Gall, Esq.
Nevada Bar No. 14200
2 BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
3 Las Vegas, Nevada 89135
Telephone: (702) 471-7000
4 Facsimile: (702) 471-7070
gallm@ballardspahr.com

5
6 Kyra E. Andrassy, Esq.
Admitted *Pro Hac Vice*
SMILEY WANG-EKVALL, LLP
7 3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
8 Telephone: (714) 445-1000
Facsimile: (714) 445-1002
9 kandrassy@swelawfirm.com

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

11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF KYRA E.
ANDRASSY, ESQ. IN SUPPORT OF
APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
OF THE RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM AUGUST 7, 2021, THROUGH
SEPTEMBER 30, 2021**

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

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

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

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

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

4 3. Attached to this declaration is a true and correct copy of the invoice for
5 the services of my firm for the period from August 7, 2021, through September 30,
6 2021 (the "Application Period").

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

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

15 6. For the professionals who record their time using written time sheets,
16 the information contained in the time sheets is transcribed into the firm's computer
17 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
20 rendered. The firm's computer billing system automatically multiplies the time
21 expended by each professional by the respective professional's billing rate to calculate
22 the amount of the fee. The firm conducts its business in reliance on the accuracy of
23 such business records.

24 8. As reflected in the attached invoice, and pursuant to the Receivership
25 Order (ECF No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46),
26 professionals at Smiley-Wang Ekvall assisted the Receiver as follows during the
27 Application Period:
28

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

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- a. ensured compliance with 28 U.S.C. § 754, by recording appropriate notices of receivership in ten different districts where property may be located in order to secure jurisdiction over this property;
- b. prepared and obtained approval of a stipulation with GoDaddy authorizing redirection of the Profit Connect website;
- c. assisted the Receiver in communications with investors;
- d. analyzed and identified potential assets and claims and worked with the Receiver and his team to devise strategies for recovering value;
- e. began preparing the motion to employ an auctioneer and to authorize the Receiver to sell personal property via an auction;
- f. prepared portions of the motion to authorize the Receiver to employ professionals that pertained to the firm;
- g. prepared, at no cost to the receiver pursuant to the SEC’s billing guidelines, the fee application for the period of time covered by the temporary receivership.

9. Smiley Wang-Ekvall has agreed to discount its standard billing rates in connect with this matter by 15 percent, and the fees being requested in this Application and the hourly rates on the invoice reflect this reduction.

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

Executed on November 1, 2021.

/s/ Kyra E. Andrassy

SMILEY | WANG-EKVALL

Insolvency. Real Estate. Business Litigation.

Smiley Wang-Ekvall, LLP
 3200 Park Center Drive, Suite 250
 Costa Mesa, CA 92626
 Phone: 714-445-1000
 Tax Payer ID: 47-1695460

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

October 18, 2021
 Our File: WIN01.0001
 Invoice # 26292

RE: Profit Connect

Statement of account for services rendered through September 30, 2021

Previous Balance **\$ 3,228.73**

Professional Services

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/09/2021	KEA	01 - Asset Analysis and Recovery Review receivership order to identify immediate tasks and determine authorizations needed (Profit Connect)	0.30	\$ 535.50/hr	\$ 160.65
08/09/2021	KEA	01 - Asset Analysis and Recovery Review info re undocumented loans to employees and strategize re best way to preserve potential recoveries (Profit Connect)	0.20	\$ 535.50/hr	\$ 107.10
08/09/2021	KEA	01 - Asset Analysis and Recovery Exchange of various correspondence re language of order re permanent receiver in relation to corporate accounts	0.10	\$ 535.50/hr	\$ 53.55
08/11/2021	KEA	01 - Asset Analysis and Recovery Exchange of correspondence re suggested resolution re fraudulent transfer re home accountant lives in	0.20	\$ 535.50/hr	\$ 107.10
08/11/2021	KEA	01 - Asset Analysis and Recovery Telephone call with M. Gall re attorney-client privilege issue and motion to withdraw basis	0.10	\$ 535.50/hr	\$ 53.55
08/19/2021	KEA	01 - Asset Analysis and Recovery Listen to audio file of sales agent to	0.20	\$ 535.50/hr	\$ 107.10

		other sales agents with misrepresentations re SEC actions and prepare correspondence to G. Winkler re recommendation re response to same			
09/13/2021	KEA	01 - Asset Analysis and Recovery Prepare letters to Brent and Joy Kovar re vacating residence by October 6	0.40	\$ 535.50/hr	\$ 214.20
09/14/2021	KEA	01 - Asset Analysis and Recovery Review status and action items re various assets and things to include in recovery plan due next month	0.40	\$ 535.50/hr	\$ 214.20
09/14/2021	KEA	01 - Asset Analysis and Recovery Telephone call with Receiver and team re status of various assets and strategies re same	1.20	\$ 535.50/hr	\$ 642.60
09/18/2021	KEA	01 - Asset Analysis and Recovery Analysis of best way to proceed with recovery of house financed for employee	0.20	\$ 535.50/hr	\$ 107.10
09/20/2021	KEA	01 - Asset Analysis and Recovery Review returned letters re notices to vacate and review addresses at which Kovars were served with summons to determine where to send them	0.20	\$ 535.50/hr	\$ 107.10
09/20/2021	KEA	01 - Asset Analysis and Recovery Prepare correspondence to counsel for the Kovars re notices to vacate to forward to his clients	0.10	\$ 535.50/hr	\$ 53.55
09/20/2021	KEA	01 - Asset Analysis and Recovery Analysis of least risky way to recover house from R. Uriarte	0.30	\$ 535.50/hr	\$ 160.65
09/21/2021	KEA	01 - Asset Analysis and Recovery Weekly meeting re recovery of assets	0.50	\$ 535.50/hr	\$ 267.75
09/21/2021	KEA	01 - Asset Analysis and Recovery Review info re truck purchased for employee's daughter	0.10	\$ 535.50/hr	\$ 53.55
09/27/2021	JH	01 - Asset Analysis and Recovery Nevada UCC search	0.20	\$ 225.25/hr	\$ 45.05
09/27/2021	KEA	01 - Asset Analysis and Recovery Analysis of standing issue re potential third party claims	0.60	\$ 535.50/hr	\$ 321.30
09/28/2021	KEA	01 - Asset Analysis and Recovery Prepare correspondence to Dale Hayes re confirmation Calvert Cliffs	0.10	\$ 535.50/hr	\$ 53.55

		house will be vacant by 10/6 deadline			
09/29/2021	KEA	01 - Asset Analysis and Recovery Review correspondence from Dale Hayes re deadline to vacate Calvert Cliffs residence	0.10	\$ 535.50/hr	\$ 53.55
09/29/2021	KEA	01 - Asset Analysis and Recovery Prepare correspondence to SEC re issue re residence	0.10	\$ 535.50/hr	\$ 53.55
09/29/2021	KEA	01 - Asset Analysis and Recovery Prepare correspondence to Receiver re recommendation re next steps re residence	0.10	\$ 535.50/hr	\$ 53.55
09/29/2021	KEA	01 - Asset Analysis and Recovery Review various correspondence from Jeff Sonn and prepare correspondence to Receiver and M. Gall with questions re same	0.20	\$ 535.50/hr	\$ 107.10
		01 - Asset Analysis and Recovery Totals	5.70	@ \$ 535.50/hr	\$ 3,052.35
			0.20	@ \$ 225.25/hr	\$ 45.05
			5.90		\$ 3,097.40
09/23/2021	KEA	02 - Asset Disposition Telephone call with Geoff Winkler re summary of personal property to be sold to include in the auction motion	0.10	\$ 535.50/hr	\$ 53.55
09/27/2021	KEA	02 - Asset Disposition Begin to prepare motion to employ auctioneer	0.60	\$ 535.50/hr	\$ 321.30
		02 - Asset Disposition Totals	0.70	@ \$ 535.50/hr	\$ 374.85
			0.70		\$ 374.85
08/09/2021	KEA	04 - Case Administration Prepare stipulation to clarify receivership order re bank account issue	0.60	\$ 535.50/hr	\$ 321.30
08/10/2021	KEA	04 - Case Administration Review correspondence re form of stipulation and circulate draft for SEC review	0.10	\$ 535.50/hr	\$ 53.55
08/10/2021	KEA	04 - Case Administration Prepere correspondence to GoDaddy re redirection of domain names	0.20	\$ 535.50/hr	\$ 107.10

08/10/2021	KEA	04 - Case Administration Prepare correspondence to Receiver re investor communication and whether we need a limit notice order	0.10	\$ 535.50/hr	\$ 53.55
08/10/2021	KEA	04 - Case Administration Review correspondence from GoDaddy re required instruction	0.10	\$ 535.50/hr	\$ 53.55
08/10/2021	KEA	04 - Case Administration Prepare stipulation re redirection of website	0.40	\$ 535.50/hr	\$ 214.20
08/11/2021	KEA	04 - Case Administration Exchange of correspondence re obtaining client files from Hayes Wayakama	0.10	\$ 535.50/hr	\$ 53.55
08/11/2021	KEA	04 - Case Administration Prepare draft investor email with answers to most common questions	0.40	\$ 535.50/hr	\$ 214.20
08/12/2021	KEA	04 - Case Administration Prepare draft email to sales agents	0.30	\$ 535.50/hr	\$ 160.65
08/12/2021	KEA	04 - Case Administration Prepare notices of receivership for multiple jurisdictions	0.70	\$ 535.50/hr	\$ 374.85
08/13/2021	KEA	04 - Case Administration Complete preparation of remainder of receivership notices	0.30	\$ 535.50/hr	\$ 160.65
08/15/2021	KEA	04 - Case Administration Prepare notice of receivership re MD Fla	0.10	\$ 535.50/hr	\$ 53.55
08/18/2021	KEA	04 - Case Administration Prepare correspondence to GoDaddy re redirection of domain names	0.10	\$ 535.50/hr	\$ 53.55
08/21/2021	KEA	04 - Case Administration Review conformed copies of notices of receivership received in the past few days	0.10	\$ 535.50/hr	\$ 53.55
08/25/2021	KEA	04 - Case Administration Exchange of various correspondence re warehouse lease and Town Square lease	0.10	\$ 535.50/hr	\$ 53.55
08/26/2021	KEA	04 - Case Administration Analysis of issue re investors who wired funds during the temporary receiverrship and prepare recommendation re same	0.20	\$ 535.50/hr	\$ 107.10
09/20/2021	KEA	04 - Case Administration	0.10	\$ 535.50/hr	\$ 53.55

		Prepare correspondence to G. Winkler re status conference tomorrow			
09/21/2021	KEA	04 - Case Administration Prepare first draft of status report	0.50	\$ 535.50/hr	\$ 267.75
09/21/2021	KEA	04 - Case Administration Attendance at status conference, employment, and fee hearings	0.60	\$ 535.50/hr	\$ 321.30
09/21/2021	KEA	04 - Case Administration Prepare for hearing this afternoon	0.30	\$ 535.50/hr	\$ 160.65
09/27/2021	KEA	04 - Case Administration Review agenda in advance of weekly call tomorrow	0.10	\$ 535.50/hr	\$ 53.55
09/28/2021	KEA	04 - Case Administration Weekly status call re assets and re investor call preparation	0.60	\$ 535.50/hr	\$ 321.30
09/29/2021	KEA	04 - Case Administration Review outline of call today with investors and prepare correspondence to Receiver re same	0.20	\$ 535.50/hr	\$ 107.10
09/29/2021	KEA	04 - Case Administration Attendance at investor call	0.50	\$ 535.50/hr	\$ 267.75
		04 - Case Administration Totals	6.80	@ \$ 535.50/hr	\$ 3,641.40
			6.80		\$ 3,641.40
08/10/2021	KEA	07 - Employment Applications Prepare portions of motion related to SWE retention	0.30	\$ 535.50/hr	\$ 160.65
08/11/2021	KEA	07 - Employment Applications Prepare declaration in support of employment motion	0.30	\$ 535.50/hr	\$ 160.65
		07 - Employment Applications Totals	0.60	@ \$ 535.50/hr	\$ 321.30
			0.60		\$ 321.30
08/18/2021	KEA	13 - Fee Applications Prepare application re fees and costs of Receiver and his professionals (no charge)	0.80	\$ 0.00/hr	No Charge
08/19/2021	KEA	13 - Fee Applications Finalize application re fees of temporary receiver and declarations in support of same (no charge)	0.90	\$ 0.00/hr	No Charge

08/20/2021	KEA	13 - Fee Applications Finalize fee application for fees re temporary receiver (no charge)	0.60	\$ 0.00/hr	No Charge
		13 - Fee Applications Totals	2.30	@ \$ 0.00/hr	\$ 0.00
			2.30		\$ 0.00
		Total Professional Services	16.30		\$ 7,434.95

Costs And Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/16/2021	Attorney Service: First Legal Drop off at Intake: Notice of Receivership, Complaint (USDC Middle District of Florida)	\$ 257.37
	Attorney Service Totals	\$ 257.37
08/13/2021	Copies: Notices of Receivership + Copies for Conformation to U.S. District Courts	\$ 126.00
09/13/2021	Copies: Correspondence to Brent and Joy Kovar re: Receivership Order	\$ 6.00
	Copies Totals	\$ 132.00
08/13/2021	Filing Fee: CA Southern District Filing of Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: District Court Western Division WA Filing of Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5231 - District Court District of Oregon: Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5232 - District Court District of New Jersey: Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5233 to District Court District of Utah: Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5234 to District Court Southern District of Iowa: Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5235 to District Court, Southern District of Florida: Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5236 to District Court, Middle District of Alabama: Notice of Receivership (Profit Connect)	\$ 49.00
08/13/2021	Filing Fee: Check No. 5230 to District Court District of Arizona Phoenix Division: Notice of Receivership (Profit Connect)	\$ 49.00
08/16/2021	Filing Fee: District Court of AZ- Notice of Receivership (Profit Connect)	\$ 49.00
	Filing Fee/Court Fee Totals	\$ 490.00
08/13/2021	Postage: FedEx Overnight to AZ District Court: Notice of Receivership (Profit Connect)	\$ 29.55
08/13/2021	Postage: FedEx Overnight to District Court Miami: Notice of Receivership (Profit Connect)	\$ 54.85
08/13/2021	Postage: FedEx Overnight to District Court Iowa: Notice of Receivership	\$ 39.60

(Profit Connect)

08/13/2021	Postage: FedEx Overnight to District Court New Jersey: Notice of Receivership (Profit Connect)	\$ 39.60
08/13/2021	Postage: FedEx Overnight to District Court Portland Oregon Division: Notice of Receivership (Profit Connect)	\$ 39.60
08/13/2021	Postage: FedEx Overnight to District Court Salt Lake City Utah Division: Notice of Receivership (Profit Connect)	\$ 29.55
08/13/2021	Postage: Notice of Receivership Return Envelopes for Conformed Copies	\$ 59.85
08/16/2021	Postage: FedEx Overnight to District Court Alabama: Notice of Receivership (Profit Connect)	\$ 54.85
08/18/2021	FedEx	\$ 287.60
09/13/2021	Postage: Correspondence to Brent and Joy Kovar re: Receivership Order	\$ 1.46
	Mailing/Postage Totals	\$ 636.51
08/12/2021	Pacer Online Research	\$ 3.30
09/03/2021	Pacer Online Research	\$ 1.80
09/20/2021	Pacer Online Research	\$ 1.40
	Pacer Fee Totals	\$ 6.50
09/27/2021	West Law Online Research	\$ 4.99
	West Law Totals	\$ 4.99
	Total Costs and Disbursements	\$ 1,527.37

Total Current Charges	\$ 8,962.32
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Summary Of Account

Balance Forward	\$ 3,228.73
Total Current Charges	\$ 8,962.32
Less Payments And Credits	
	9/27/2021 Payment - Check (\$3,228.73)
Balance Due	\$ 8,962.32

Notes:

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

Trust Account Summary

Billing Period: 08/07/2021 - 10/18/2021

Client: Geoff Winkler | General Matter Trust

Total Deposits	Total Disbursements	Current Balance
\$0.00	\$0.00	\$0.00

Date	Transaction	Deposit	Disbursement	Balance
No activity for this billing period.				

User Hours Summary

Billing Period: 08/07/2021 - 09/30/2021

User Hour Totals

User Initials	User	Hours Billed	Rate/Hour	Amount Billed
KEA	Kyra E Andrassy	2.30	\$ 0.00	\$ 0.00
KEA	Kyra E Andrassy	13.80	\$ 535.50	\$ 7,389.90
JH	Janet Hogan	0.20	\$ 225.25	\$ 45.05
Totals		16.30		\$ 7,434.95

1 Maria A. Gall, Esq.
Nevada Bar No. 14200
2 BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
3 Las Vegas, Nevada 89135
Telephone: (702) 471-7000
4 Facsimile: (702) 471-7070
gallm@ballardspahr.com

5
6 Kyra E. Andrassy, Esq.
Admitted *Pro Hac Vice*
SMILEY WANG-EKVALL, LLP
7 3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
8 Telephone: (714) 445-1000
Facsimile: (714) 445-1002
9 kandrassy@swelawfirm.com

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

11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

20 Defendants.

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

**DECLARATION OF SERGIO
KOPELEV IN SUPPORT OF
APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
OF THE RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM AUGUST 7, 2021, THROUGH
SEPTEMBER 30, 2021**

21
22 I, Sergio Kopelev, declare as follows:

23 1. I am over 21 years old and Vice President of Engagement Management
24 with Stroz Friedberg, where I am responsible for directing engagements involving
25 cybercrime and data breach response, digital forensic, intellectual property
26 protection, and electronic discovery.

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

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

1 of the Receiver’s application for approval of his fees and costs of my firm and those of
2 his professionals in connection with Profit Connect Wealth Services, Inc. This
3 declaration is based on my personal knowledge, except where made on information
4 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 invoice for
6 the services of my firm for the period from August 7, 2021, through September 30,
7 2021 (the “Application Period”).

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

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

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

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

25 8. As reflected in the attached invoice, and pursuant to the Receivership
26 Order (ECF No. 26) and the Order Authorizing Employment of Computer Forensic
27 Experts (ECF No. 46), professionals at Stroz Friedberg assisted the Receiver as
28 follows during the Application Period:

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

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- a. continuing to inventory digital devices used by Profit Connect principals and employees;
- b. continuing to gain access to and export financial data for Profit Connect;
- c. continuing to perform forensic collection of data from various digital devices;
- d. continuing to export data from various digital devices;
- e. continuing to process and host data exported from various digital devices;
- f. continuing to perform searches of hosted data; and
- g. continuing to assist with Profit Connect employee interviews.

9. Stroz Friedberg has agreed to discount its standard billing rates by providing a blended rate of \$525.00 per hour, which takes into account its current hourly rates ranging from \$110.00-\$275.00 per hour for administrative professionals; \$150 - \$360 for Specialists, Analysts, and Associates; \$275 - \$565 for Consultants; \$385 - \$660 for Managers and Directors; \$385 - \$660; \$550 to \$935 for Vice Presidents and Managing Directors; and \$935.00-\$1,250.00 per hour for its c-suite executives.

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

Executed on November 1, 2021.

/s/ Sergio Kopelev

INVOICE

Invoice Number: K0301-0007601
Customer Number: 104460608

Invoice Date: 28 Sep 2021**Due Date:** 28 Oct 2021**Email:** geoff@americanfiduciaryservices.com**Project ID:** PRJ-0000030415**Project Name:** Project Valeria**Project Manager:** Sergio Kopelev

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

Other Charges/Services	3,175.41
Hourly Fees	86,756.25
Expenses	9,751.10
Sub-total:	99,682.76
Total Payable in USD:	99,682.76

Payment is due within 30 days of the invoice date.

Please indicate Customer # 104460608, Invoice # K0301-0007601 and the amount paid on the Electronic Payment or Check to ensure funds are applied to your account.

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

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

INVOICE

Invoice Number: K0301-0007601
Customer Number: 104460608

Other Charges/Services Summary		
Service	Quantity	Amount
IN Hosting (per GB)	27.11	162.66
Initial Processing (IN) (per GB)	27.11	677.75
User License(s)	1	85.00
EDD Mobile device processing (per run)	3	2,250.00
	Sub-total:	3,175.41
Hourly Fees Summary		
Consultant	Hours	Amount
Allan Vogel	66.00	34,650.00
Jishnu Pradeep	85.50	44,887.50
Oleg Gorodetskiy	1.50	0.00
Sergio Kopelev	13.75	7,218.75
	Sub-total:	86,756.25
Expenses Summary		
Expense Item		Amount
Airfare - Baggage Fee		349.00
Airfare - Ticket		258.40
Auto - Parking		107.00
Auto - Rental		638.01
Hotel - Other		3,186.29
Hotel - Rate		2,570.65
Hotel - Tax		350.43
Meals - Employee (Individual)		1,419.13
Office Expense - Postage		16.55
Office Expense - Supplies		54.18
Telecom - Internet		6.00
Transportation – Bus/Taxi/Limousine/Ground		196.34
Travel - Other		599.12
	Sub-total:	9,751.10

INVOICE



Invoice Number: K0301-0007601
Customer Number: 104460608

Hourly Fees Details

<u>Date</u>	<u>Consultant</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
09 Aug 2021	Allan Vogel	Collection of 3 devices, documentation and imaging. Preparation to change administrator's permissions on corporate applications.	11.00	5,775.00
09 Aug 2021	Jishnu Pradeep	Perform intake, document, and photograph items ES0018A and ES0019A. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	12.00	6,300.00
09 Aug 2021	Sergio Kopelev	Confer with receiver; confer with and direct staff.	2.50	1,312.50
10 Aug 2021	Allan Vogel	Preparation to change administrator's permissions on corporate applications.	10.00	5,250.00
10 Aug 2021	Jishnu Pradeep	Perform intake, document, photograph and image the web server (ES0020A) and crypto wallet (ES0021A). Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	8.00	4,200.00
11 Aug 2021	Allan Vogel	Collection of 8 devices, documentation, and imaging.	9.00	4,725.00
11 Aug 2021	Jishnu Pradeep	Perform intake, document, photograph and image the evidence items ES0022A, ES0023A, ES0024A and ES0025. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	8.00	4,200.00
11 Aug 2021	Sergio Kopelev	Confer with receiver and counsel; confer with and direct staff.	2.50	1,312.50
12 Aug 2021	Allan Vogel	Collection of 15 devices, documentation, and imaging. Testing of door locks to determine how to remove users.	12.50	6,562.50
12 Aug 2021	Jishnu Pradeep	Perform intake, document, photograph, and image evidence items ES0026A, ES0027A, ES0028A, ES0029A, ES0031A, ES0033A and ES0033B. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	12.00	6,300.00
13 Aug 2021	Allan Vogel	Evidence management in preparation for leaving site. Evidence management for evidence locker at 6955 Speedway, Las Vegas. Evidence Management for Server Rack in warehouse. Prepped evidence to be shipped back to Minnesota lab. Evidence collection, documentation, and imaging of several devices. Additional testing of door locks.	13.50	7,087.50
13 Aug 2021	Jishnu Pradeep	Perform intake, document, photograph, and image evidence items ES0036A, ES0037A, and ES0040A. Perform Google Takeout for custodian B. Kovar's personal Google account and upload to EDD for processing. Verify the evidence, assign evidence numbers, and copy it to OAD/WD drives.	12.00	6,300.00
14 Aug 2021	Jishnu Pradeep	Generate copy of all evidence items for A. Vogel. Time spend traveling from client location (Las Vegas, NV) to Minneapolis, MN.	6.00	3,150.00
16 Aug 2021	Allan Vogel	Prepared and delivered keys for Las Vegas ProfitConnect building to be delivered to Geoff to be delivered by FedEx. Creation of report for account access for ProfitConnect tools.	2.00	1,050.00
16 Aug 2021	Sergio Kopelev	Confer with and direct staff; confer with counsel; confer with receiver; provide update.	1.25	656.25
17 Aug 2021	Allan Vogel	Draft of report for AFS to illustrate our overall finding regarding the crypto mining activities at ProfitConnect	2.00	1,050.00
17 Aug 2021	Jishnu Pradeep	Perform imaging of evidence item ES0025A (Data Drive from B. Kovar's Office Desktop). Verify the image and sync across OAD/WD pair. Send B. Kovar's Google Takeout collection to EDD for processing.	4.00	2,100.00
17 Aug 2021	Sergio Kopelev	Confer with and direct staff; confer with receiver.	1.00	525.00
18 Aug 2021	Jishnu Pradeep	Perform imaging of evidence item ES0030A (B. Kovar's Microsoft Surface). Perform imaging of evidence item ES0033C and ES0033D (Data Drives from B. Kovar's Home Server). Verify the images and sync across OAD/WD pair.	5.50	2,887.50
18 Aug 2021	Oleg Gorodetskiy	Process Mobile data in CI: ES0026A	1.50	0.00
19 Aug 2021	Jishnu Pradeep	Perform imaging of evidence item ES0038A through ES0038D (Drives from B. Kovar's Warehouse Server Rack). Verify the images and sync across OAD/WD pair. Generate mobile device reports for B. Kovar's Galaxy Fold (Personal Device) and send to EDD for processing.	4.50	2,362.50
20 Aug 2021	Jishnu Pradeep	Perform imaging of evidence item ES0038E through ES0038G (Drives from B. Kovar's Warehouse Server Rack). Verify the images and sync across OAD/WD pair.	6.00	3,150.00
20 Aug 2021	Sergio Kopelev	Confer with and direct staff; confer with receiver.	1.50	787.50
23 Aug 2021	Jishnu Pradeep	Time spent troubleshooting and imaging failed devices belonging to custodian B. Kovar. Time spent troubleshooting Microsoft Surface Pro X device belonging to custodian B. Kovar.	2.00	1,050.00
23 Aug 2021	Sergio Kopelev	Confer with and direct staff; confer with receiver.	1.00	525.00
24 Aug 2021	Allan Vogel	Worked on Wordpress site to fix the display of SEC ruling and conflict with pulling reports.	2.00	1,050.00
24 Aug 2021	Sergio Kopelev	Confer with and direct staff, confer with counsel.	0.75	393.75
25 Aug 2021	Jishnu Pradeep	Perform imaging of failed evidence drives and devices. Record status on the evidence tracker and send an update to A. Vogel. Sync and verify evidence items across the OAD/WD pair. Generate imaging form for all the evidence collected.	4.50	2,362.50

INVOICE

Invoice Number: K0301-0007601
Customer Number: 104460608

Hourly Fees Details

Date	Consultant	Narrative	Hours	Amount
26 Aug 2021	Sergio Kopelev	Confer with and direct staff.	0.50	262.50
27 Aug 2021	Jishnu Pradeep	Verify if all data sent to EDD has been processed and update the tracking spreadsheet accordingly. Fix issues with WordPress login page and respond to client query.	1.00	525.00
27 Aug 2021	Sergio Kopelev	Confer with and direct staff.	1.50	787.50
28 Aug 2021	Allan Vogel	Tested limiting access for agents on agent Wordpress website.	1.00	525.00
30 Aug 2021	Allan Vogel	Performing clean up for agents on Wordpress site. Removing access from agents.	2.00	1,050.00
30 Aug 2021	Sergio Kopelev	Confer with and direct staff; confer with receiver.	0.75	393.75
31 Aug 2021	Allan Vogel	Performing maintenance on Wealth Services side. Client is not able to download attachment in orders section of database.	1.00	525.00
31 Aug 2021	Sergio Kopelev	Confer with and direct staff.	0.50	262.50
Sub-total Hourly Fees Details			166.75	86,756.25

INVOICE**Empower Results®**

Invoice Number: K0301-0008107
Customer Number: 104460608

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

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

Other Charges/Services	9,938.29
Hourly Fees	8,636.25
Sub-total:	18,574.54
Total Payable in USD:	18,574.54

Payment is due within 30 days of the invoice date.

Please indicate Customer # 104460608, Invoice # K0301-0008107 and the amount paid on the Electronic Payment or Check to ensure funds are applied to your account.

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

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

INVOICE**Empower Results®**

Invoice Number: K0301-0008107
Customer Number: 104460608

Other Charges/Services Summary

Service	Quantity	Amount
Hard Drive(s)	4	1,000.00
IN Hosting (per GB)	441.34	2,648.04
Initial Processing (IN) (per GB)	244.81	6,120.25
User License(s)	2	170.00
	Sub-total:	9,938.29

Hourly Fees Summary

Consultant	Hours	Amount
Allan Vogel	9.45	4,961.25
Jishnu Pradeep	6.00	3,150.00
Sergio Kopelev	1.00	525.00
	Sub-total:	8,636.25

INVOICE

Invoice Number: K0301-0008107
 Customer Number: 104460608

Hourly Fees Details

Date	Consultant	Narrative	Hours	Amount
01 Sep 2021	Allan Vogel	Performing maintenance on Wealth Services side.	2.00	1,050.00
02 Sep 2021	Allan Vogel	Validated that Brent did not have access to email. Reset all users passwords for O365	3.00	1,575.00
07 Sep 2021	Allan Vogel	Redesign of ProfitConnects Homepage after redirect from Receiverships homepage.	2.00	1,050.00
07 Sep 2021	Sergio Kopelev	Confer with and direct staff.	0.25	131.25
10 Sep 2021	Jishnu Pradeep	Extract WooCommerce DB based from Profit Connect Agent Portal. Convert to MS Access database format.	2.00	1,050.00
14 Sep 2021	Allan Vogel	Discussed WooCommerce Database issue with Jishnu	0.15	78.75
15 Sep 2021	Sergio Kopelev	Confer with and direct staff.	0.25	131.25
16 Sep 2021	Allan Vogel	Review of WooCommerce Database Issue with Tim	0.15	78.75
17 Sep 2021	Allan Vogel	Follow up discussion regarding Database issue with Tim, Jishnu and email with AFS	0.15	78.75
17 Sep 2021	Jishnu Pradeep	Export order reports as CSVs from Profit Connect's Wealth Builder and Agent Websites. Assign ESNs and move to OAD/WD pair. Attend client call to discuss exporting reports from WooCommerce.	2.00	1,050.00
17 Sep 2021	Sergio Kopelev	Confer with and direct staff.	0.25	131.25
22 Sep 2021	Jishnu Pradeep	Ship evidence back to the client. Complete imaging form and upload to CDP along with evidence photographs. Ship OAD/WD pair to NYC lab.	2.00	1,050.00
30 Sep 2021	Allan Vogel	Review of website that outside counsel requested to fix.	2.00	1,050.00
30 Sep 2021	Sergio Kopelev	Confer with and direct staff.	0.25	131.25
Sub-total Hourly Fees Details			16.45000	8,636.25

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

11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

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

**ORDER APPROVING APPLICATION
FOR ALLOWANCE AND PAYMENT
OF FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM AUGUST 7, 2021, THROUGH
SEPTEMBER 30, 2021**

23 Before the Court is the Application for Allowance and Payment of Fees and
24 Costs of the Receiver and His Professionals for the Period from August 7, 2021,
25 Through September 30, 2021 [Docket No. ___] ("Application").

26 The Court having found that the fees and costs are reasonable, IT IS HEREBY
27 ORDERED that the Application is APPROVED.
28

1 (1) Geoff Winkler and American Fiduciary Services are allowed \$285,822.90
2 in fees and \$20,338.33 in costs;

3 (2) Ballard Spahr is allowed \$27,022.77 in fees and \$1,408.89 in costs;

4 (3) Smiley Wang-Ekval, LLP, is allowed \$7,434.95 in fees and \$1,527.37 in
5 costs;

6 (4) Stroz Friedberg is allowed \$95,392.50 in fees and \$22,864.80 in costs;

7 and

8 (5) The Receiver is authorized to pay 80% of the allowed fees and 100% of
9 the allowed costs.

10 IT IS ORDERED.

11
12 _____
13 DATED: _____
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SMILEY WANG-EKVALL, LLP
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SERVICE LIST

BY COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”):

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