1 2 3 4	KARA B. HENDRICKS, ESQ. Nevada Bar No. 07743 KYLE A. EWING, ESQ. Nevada Bar No. 14051 GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135	
5	Telephone: (702) 792-3773 Facsimile: (702) 792-9002	
6	Email: (702) 792-9002 Email: hendricksk@gtlaw.com ewingk@gtlaw.com	
7	KYRA E. ANDRASSY, ESQ.*	
8	*Admitted Pro Hac Vice RAINES FELDMAN LITTRELL LLP	
9	4675 MacArthur Court, Suite 1550 Newport Beach, CA 92660	
10	Telephone: (310) 440-4100 Facsimile: (310) 691-1943 Email: kandrassy@raineslaw.com	
11	Attorneys for Receiver,	
12	Geoff Winkler of American Fiduciary Service	ces
13	IN THE UNITED STAT	TES DISTRICT COURT
14	FOR THE DISTR	ICT OF NEVADA
15	SECURITIES AND EXCHANGE	Case No.: 2:21-cv-01298-JAD-BNW
16	COMMISSION,	[HEARING REQUESTED]
17	Plaintiff,	SEVENTEENTH APPLICATION FOR
18	V.	ALLOWANCE AND PAYMENT OF FEES AND COSTS OF THE
19	PROFIT CONNECT WEALTH SERVICES, INC., JOY I. KOVAR, and BRENT	RECEIVER AND HIS PROFESSIONALS FOR THE PERIOD
20	CARSON KOVAR,	FROM JULY 1, 2025, THROUGH
21	Defendants.	SEPTEMBER 30, 2025
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23		
24	Geoff Winkler of American Fiduciary	Services, LLC, the permanent receiver (the
25	"Receiver") over Profit Connect Wealth Serv	ices, Inc., and any subsidiaries and affiliated
26	(together, "Profit Connect") pursuant to an ord	der entered on August 6, 2021 (the "Receive
27	Order"), submits this Seventeenth Application f	for Allowance and Payment of Fees and Cost.
28	of the Receiver and His Professionals For the I	Period From July 1, 2025, Through Septembe

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30, 2025 ("Seventeenth Application"), for the fees and costs of the professionals he employed to assist him in fulfilling his duties under the Receiver Order. The period of time covered by this Application is from July 1, 2025, through September 30, 2025 (the "Application Period").

MEMORANDUM OF POINTS AND AUTHORITIES

Because the Receiver is not a licensed attorney, does not have in-house counsel, and is not a computer expert, he employed professionals to assist him in fulfilling his duties as the Receiver.

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

- (1) \$42,921.00 in fees and \$3,501.51 in costs for the Receiver;
- (2) \$6,981.35 in fees for Greenberg Traurig related to the main receivership action and \$11,506.40 in fees related to the litigation against former sales agents and promoters;
- (3) \$2,034.90 in fees and \$202.50 in costs for Raines Feldman Littrell LLP; and
- **(4)** \$24,219.30 for hosting costs for TCDI.

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

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

I. RELEVANT BACKGROUND AND PROCEDURAL HISTORY

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

On July 23, 2021, defendants stipulated to modify the temporary restraining order to

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appoint the Temporary Receiver. By order entered on August 6, 2021, the Court approved a stipulation of the parties appointing the Receiver as the permanent receiver.

During this Application Period, the Receiver continued to administer the needs of the estate, including focusing on resolution of the litigation pending in Texas, giving notice to claimants of a proposed settlement with Bank of America, communicating with investors, bringing an avoidance action against former employees and promoters, and continuing to pursue claims relating to legal malpractice. As detailed in the recently filed status report (ECF 253), these efforts have resulted in the now final settlement with Bank of America, a stipulated resolution with Jeffrey Nicholas in the Texas litigation, and resolution of all but one dispute with a credit card company, with the last pending one in settlement discussions.

As of September 30, 2025, the Receiver is holding \$2,253,302.04 in cash with the total value of assets of the estate estimated to be \$5,460,011.94 (inclusive of the cash). The fees incurred during the Application Period generated revenues for the estate in the Application Period and are expected to continue to result in the generation of additional recoveries for the estate in excess of the fees incurred. As was set forth in the motion to approve the employment of the professionals and because receivership work is a form of public service, each of the professionals has agreed to discount their typical hourly rate by 15%, and this discount is reflected in the fees being sought in this Application.

II. LEGAL AUTHORITY

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

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

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

³ Fed. R. Civ. P. 66.

As the Ninth Circuit explained:

(11th Cir. 1993)).

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

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

III. THE FEES AND COSTS BEING REQUESTED

As set forth in prior applications, in evaluating the fees and costs of the Receiver and his professionals, the fact that Profit Connect had no books and records, including books of account, or any functioning accounting department must be taken into account. The absence of these records meant the Receiver and his team were forced to get the documents from third parties that they need to determine what happened with funds put in by investors. This has required the issuance of subpoenas to third parties, including financial institutions, and often ensuing discussions with the subpoenaed parties about the scope or timing of the requested production. It also means that the Receiver has had to recreate accounting records by reconstructing the entity's financials using financial statements and offsetting financial

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

of creditors.").

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

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

records. This process has been completed.

During the Application Period the Receiver and his team gave the notice required by the Bank of America settlement to all claimants of the Profit Connect receivership. That settlement has now been approved on a final basis and the Receiver is awaiting payment. The Receiver continued to work with claimants who received international wires, or whom have not cashed their distribution check, or otherwise have questions on distributions. With respect to the ongoing litigation in Texas, the Court previously approved settlement agreements with two of the named Defendants; on the eve of trial, a settlement was reached with the remaining defendant, Jeffrey Nicholas and the Court approved that settlement in September. In addition, and relating to the ongoing litigation in the Eighth Judicial District of Clark County Nevada where the Receiver's team has worked with contingency counsel to pursue claims against Profit Connect's former legal counsel, discovery was ongoing but the matter has recently been resolved, with the settlement in the process of being documented. Last, with Court approval, the Receiver has now brought litigation against former employees who received funds or gifts in excess of their W-2 wages and agents who received bonuses or commission for bringing investors into Profit Connect.

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

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

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a. THE RECEIVER

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[Fees of \$42,921.00 and costs of \$3,501.51]

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

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

- Continued efforts on working with claimants who are receiving international wires, have not cashed their distribution check, or otherwise have questions on distributions;
- Communicated with investors;
- Continued efforts on third party recovery with former employees who received funds or gifts from Profit Connect in excess of their W-2 wages, obtaining Court approval to bring those claims and then filing the litigation;
- Continued efforts on third party recovery with agents who received bonuses or commissions for bringing investors into Profit Connect, obtaining Court approval to bring those claims and then filing the complaint;
- Notified all claimants of the receivership estate of their ability to opt out of the settlement with Bank of America, which settlement has now been approved on a final basis;
- Obtained Court approval of a settlement that resolves the claims against the last defendant in the Texas litigation; and

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Continued efforts to pursue the legal malpractice claim; and

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

Name	Title	Hours	Rate/Hr.	Total
Geoff Winkler	Receiver	47.5	\$340.00	\$16,150.00
John Hall	Accountant	4.5	\$310.00	\$1,395.00
Eileen Castle	CPA/Accountant	17.8	\$395.00	\$7,031.00
Renee Dieffenderfer	Associate	4.9	\$255.00	\$1,249.50
Sara Bond	Senior Associate	3.2	\$255.00	\$816.00
Seungmi Yoo	Consultant	35.9	\$250.00	\$8,975.00
Anna Eklund	Associate Business Consultant	32.3	\$215.00	\$6,944.50
Jen Hardy	Office Administrator	1.8	\$200.00	\$360.00
Tota	ıl	147.9		\$42,921.00

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

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

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

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U.S. Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses.

As with the previous fee application, this Application reflects the Receiver's continued drop in the number of hours required to manage this case with the forensic accounting completed.

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

Category	Total Cost
Airfare	\$2,154.97
Automotive Expense	\$95.30
Document and asset storage	\$363.00
Per Diem Meals	\$64.50
Internet and online fees	\$801.43
Printing and Photocopying	\$15.01
Miscellaneous	\$7.30
Total	\$3,501.51

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

This Application also reflects the Receiver's anticipated drop in the expenses required to manage this case due to the sale of the personal property, closure of the business, turn-over of the warehouse location to the landlord, and the reduction of travel related to each.

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

b. **GREENBERG TRAURIG**

[Fees of \$6,981.35 related to the main receivership case and \$11,506.40 related to the litigation involving former employees and promoters]

During the Application Period, and as reflected in the invoices for matter 209375.010200 that are attached to the Declaration of Kara Hendricks, which is **Exhibit 2**, pursuant to the Receivership Order (ECF No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46), professionals at Greenberg Traurig assisted the Receiver as follows during the Application Period: preparation and filing of the necessary quarterly status report; working with outside counsel on third party litigation matters, including interfacing with counsel in Texas proceeding to file a motion to approve a settlement with Jeffrey Nicholas; interfacing with counsel in Nevada malpractice proceeding; negotiating with former promoters and employees of Profit Connect and interfacing with promoters and employees of Profit Connect in an effort to avoid litigation and pre-litigation efforts.

As reflected in the invoices for matter 209375.010900 that are attached to the Hendricks Declaration, pursuant to the Receivership Order (ECF No. 26) and the Order Granting Motion for Order in Aid of Receivership to Pursue Clawback Actions Against Former Promoters and Employees of Profit Connect (ECF No. 249) ("Clawback Action"), professionals at Greenberg Traurig assisted the Receiver in pursuing the Clawback Action by serving the complaint, communicating and attempting to resolve claims with defendants after service, preparing documents to obtain Court approval of settlement amounts with certain defendants, and responding to motions to dismiss filed by certain defendants.

Greenberg Traurig and Raines Feldman Littrell continue to coordinate their efforts to avoid any duplication of services.

Greenberg Traurig has discounted its standard fees by 15% and seeks a total of \$18,487.75 in discounted fees.

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

c. RAINES FELDMAN LITTRELL LLP

[Fees of \$2,034.90 and Costs of \$202.50]

Raines Feldman Littrell began providing services to the Receiver on April 16, 2025. During the Application Period, the Firm continued its settlement discussions with Chase Bank

and obtained a tolling agreement pending the outcome of those discussions. Raines Feldman also worked with special litigation counsel handling the Bank of America litigation on the final approval documents. Raines Feldman Littrell incurred a total of \$2,034.90 in fees in connection with these efforts, which reflect a 15% discount off of the standard hourly rates.

Raines Feldman Littrell's expenses for the Application Period are as follows:

Category	Total Cost
Misc: First Legal Network	\$202.50
Total	\$202.50

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

d. TECHNOLOGY CONCEPTS & DESIGN, INC.

[Licensing, Hosting, & Project Management Costs of \$24,219.30]

As a result of an acquisition of assets from Stroz Friedberg and other affiliates of Aon PLC, Technology Concepts & Design, Inc. ("TCDI") now provides eDiscovery services to the Receiver. During the Application Period and because of the size of the data being hosted, TCDI charged hosting costs of \$24,219.30 in connection with those services. The Receiver has continued to maintain this database because of the pending criminal action against Brent Kovar and because of the pending litigation against former employees and promoters.

TCDI's invoices are attached to the Declaration of Sam Bastawros, attached as **Exhibit 4**.

e. COMMUNICATION WITH SEC COUNSEL

The Receiver has provided this Application to SEC staff prior to its submittal to this Court so that it can review the invoices and can provide comments to the Receiver prior to the filing of the fee application. The Receiver and his professionals are sensitive to the feedback received from the SEC staff.

1		It is re	espectfully requested that that tl	he Court approve 100% of the professionals' fees
2	and ex	xpenses	s, and also authorize the payme	ent of those fees and expenses on a percentage,
3	interin	n basis,	, as requested herein.	
4	IV.	CON	CLUSION	
5		Based	d on the foregoing and pursua	ant to Section X.G. of the Receiver Order, the
6	Receiv	ver and	his professionals request entry	of an order: ⁷
7		(1)	Allowing the Receiver \$42,	921.00 in fees and \$3,501.51 in costs for the
8	Applio	cation I	Period;	
9		(2)	Allowing Greenberg Traurig	\$6,981.35 in fees related to the main receivership
10	action	and \$1	1,506.40 related to the litigation	n against former employees and promoters;
11		(3)	Allowing Raines Feldman Li	ttrell LLP \$2,034.90 in fees and \$202.50 in costs
12	for the	e Appli	cation Period;	
13		(4)	Allowing TCDI \$24,219.30 in	n costs for the Application Period;
14		(5)	Authorizing the Receiver to	pay 80% of the allowed fees and 100% of the
15	allowe	ed costs	s from funds on hand in the rece	eivership estate; and
16		(6)	Granting such other and furth	ner relief as the Court deems just and
17	approp	priate.		
18	DATE	ED this	3rd day of December 2025.	
19				RAINES FELDMAN LITTRELL LLP
20				By: <u>/s/ Kyra E. Andrassy</u> Kyra E. Andrassy, Esq.
21 22				(Admitted <i>Pro Hac Vice</i>) 4675 MacArthur Court, Suite 1550 Newport Beach, CA 92660
23				-and-
24				Kara B. Hendricks, Esq.
25				Nevada Bar No. 07743 GREENBERG TRAURIG, LLP
26				10845 Griffith Peak Drive, Suite 600 Las Vegas, NV 89135 Attorneys for Receiver
27				morneys for Receiver

⁷ The form of the order is attached as Exhibit 5.

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that, on the **3rd day of December 2025**, a true and correct copy of the foregoing **SEVENTEENTH APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND COSTS OF THE RECEIVER AND HIS PROFESSIONALS FOR THE PERIOD FROM JULY 1, 2025, THROUGH SEPTEMBER 30, 2025** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ Connie-Marie Santiago
An employee of RAINES FELDMAN
LITTRELL LLP

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3	EXHIBIT
4	Exhibit 1
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6	Exhibit 2
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8	Exhibit 3
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11	Exhibit 4
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13	Exhibit 5
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	Lis	T OF EXHIBITS						
Ехнівіт	DESCRIPTION							
Exhibit 1	DECLARATION OF C	GEOFF WINKLER						
	Ехнівіт А	EXHIBIT A STANDARDIZED FUND ACCOUNTING REPORT						
Exhibit 2	DECLARATION OF I	OF KARA B. HENDRICKS						
	Ехнівіт А	GREENBERG TRAURIG INVOICES						
Exhibit 3	DECLARATION OF I	KYRA ANDRASSY						
	Ехнівіт А	RAINES FELDMAN LITTRELL LLP INVOICES						
Exhibit 4	DECLARATION OF S	SAM BASTAWROS						
	Ехнівіт А	TCDI Invoices						
Exhibit 5	[PROPOSED] ORDER	R						

EXHIBIT 1

EXHIBIT 1

DECLARATION OF GEOFF WINKLER

1 2 3 4 5 6	KARA B. HENDRICKS, ESQ. Nevada Bar No. 07743 KYLE A. EWING, ESQ. Nevada Bar No. 14051 GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 Telephone: (702) 792-3773 Facsimile: (702) 792-9002 Email: hendricksk@gtlaw.com ewingk@gtlaw.com	
7 8 9 10	KYRA E. ANDRASSY, ESQ.* *Admitted Pro Hac Vice RAINES FELDMAN LITTRELL LLP 4675 MacArthur Court, Suite 1550 Newport Beach, CA 92660 Telephone: (310) 440-4100 Facsimile: (310) 691-1943 Email: kandrassy@raineslaw.com	
12	Attorneys for Receiver, Geoff Winkler of American Fiduciary Services	
14	IN THE UNITED STATES	S DISTRICT COURT
15	FOR THE DISTRIC	T OF NEVADA
16	SECURITIES AND EXCHANGE COMMISSION,	Case No.: 2:21-cv-01298-JAD-BNW
17	Plaintiff,	DECLARATION OF GEOFF WINKLER IN SUPPORT OF THE
18	V.	SEVENTEENTH APPLICATION FOR ALLOWANCE AND PAYMENT OF
19 20	PROFIT CONNECT WEALTH SERVICES, INC., JOY I. KOVAR, and BRENT	FEES AND COSTS OF THE RECEIVER AND HIS PROFESSIONALS FOR THE PERIOD FROM JULY 1, 2025, THROUGH
21		SEPTEMBER 30, 2025
22		
23		
24	I, Geoff Winkler, declare as follows:	
25		founding member and the chief executive
26	officer of American Fiduciary Services LLC ("AF	
27		natters presented in this declaration, and I
28		th Quarterly Application for Allowance and

- Payment of Fees and Costs of the Receiver and His Professionals for the Period from July 1, 2025, through September 30, 2025 (the "Application"), in connection with Profit Connect Wealth Services, Inc.
- 3. This declaration is based on my personal knowledge, except where made on information and belief, and as to those matters, I believe them to be true.
- 4. On August 6, 2021, on stipulation of the parties, the Court appointed me as the permanent receiver of Profit Connect Wealth Services, Inc. and any of its subsidiaries and affiliates ("Profit Connect"). This fee application covers the period from July 1, 2025, through September 30, 2025 (the "Application Period.")
- 5. In the ordinary course of AFS's business, we keep a record of all time expended by our professionals in the rendering of professional services on a computerized billing system.
- 6. At or near the time the professional services are rendered, professionals of the firm records (a) the description of the nature of the services performed, (b) the duration of the time expended, and (c) the client/matter name or number by either: (1) writing such information on a time sheet, or (2) inputting such information directly into the firm's computer billing system.
- 7. For the professionals who record their time using written time sheets, the information contained in the time sheets is transcribed into the firm's computer billing system.
- 8. The firm's computer billing system keeps a record of all time spent on a client/matter, the professional providing the services, and a description of the services rendered. The firm's computer billing system automatically multiplies the time expended by each professional by the respective professional's billing rate to calculate the amount of the fee. The firm conducts its business in reliance on the accuracy of such business records, but I have nevertheless reviewed and, as appropriate, edited the entries in the firm's billing system.
- 9. As reflected in the attached invoice, pursuant to the Receivership Order, my team and I performed the following duties during the Application Period:
- 10. During the Application Period, AFS gave the notice required by the Bank of America settlement to all claimants of the Profit Connect receivership. That settlement has

now been approved on a final basis and I am awaiting payment. I continued to work with claimants who received international wires, or whom have not cashed their distribution check, or otherwise have questions on distributions. With respect to the ongoing litigation in Texas, the Court previously approved settlement agreements with two of the named Defendants; on the eve of trial, a settlement was reached with the remaining defendant, Jeffrey Nicholas and the Court approved that settlement in September. In addition, and relating to the ongoing litigation in the Eighth Judicial District of Clark County Nevada where my team has worked with contingency counsel to pursue claims against Profit Connect's former legal counsel, discovery was ongoing but the matter has recently been resolved, with the settlement in the process of being documented. Last, with Court approval, I have now brought litigation against former employees who received funds or gifts in excess of their W-2 wages and agents who received bonuses or commission for bringing investors into Profit Connect.

- 11. Due to its broad range of experience and expertise, AFS performs almost all required work in-house, saving both time and money, including tasks involving corporate accounting, forensic accounting, case administration, claims administration, asset valuation, investor communication and internet technology.
- 12. AFS's billing philosophy is to leverage work down to the staff member with the lowest bill rate that also has the skills and experience necessary to complete the task. This allows AFS to minimize the cost to complete all work associated with the case, ensuring a maximum return to stakeholders involved in the matter while also preserving the quality of our work product. AFS does not bill for travel time in regulatory cases.
- 13. AFS's rates include a 15 percent discount off its already discounted hourly rates for government matters and will not increase for the pendency of the case. Both the standard regulatory rate and the discounted regulatory rate reflect a significant discount off our standard consulting rates.
- 14. All billing standards meet or exceed the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (SFAR) and the

U.S. Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses.

- 15. AFS will not seek reimbursement for routine copying, facsimile, postage, or other expenses. Any expenses that we seek to have reimbursed will be done in accordance with the SEC and U.S. Trustee guidelines referenced above. Costs directly attributable to the administration of the receivership estate will be paid directly by the estate in accordance with the order of appointment.
- 16. Attached to this declaration as **Exhibit A**, is a true and correct copy of the invoice for my services and the services of my team at AFS for the Application Period, along with the Standardized Fund Accounting Report.
- 17. As of September 30, 2025, I was holding approximately \$2,253,302.04 in cash belonging to Profit Connect. The total value of assets is estimated to be \$5,460,011.94, inclusive of the abovementioned.
- 18. I hereby certify that I have read the Application to which this declaration will be attached.
- 19. I respectfully submit that the fees and expenses incurred during the Application Period were fair, reasonable, necessary, and of significant benefit and request the Court approve the fees and costs reflected in the invoices and approve payment in the amounts reflected in the Fifteenth Application.

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

Executed on this 3rd day of December 2025.

/s/ Geoff Winkler

GEOFF WINKLER
Declarant

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EXHIBIT A

EXHIBIT A

STANDARDIZED FUND ACCOUNTING REPORT

STANDARDIZED FUND ACCOUNTING REPORT for SEC v. Profit Connect Wealth Services, Inc. et al. Receivership; Civil Docket No. 2:21-cv-01298-JAD-BNW Reporting Period from 07/01/2025 to 09/30/2025

FUND ACCO	UNTING (See instructions) I	Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 07/01/2025):	2,330,049.85	Subtotal	Grand Total
	Increases in Fund Balance:	2,000,010.00		
Line 2	Business Income	-		
Line 3 Line 4	Cash and Securities (in transit) Interest/Dividend Income	3,020.02		
Line 5	Business Asset Liquidation	3,020.02		
Line 6	Personal Asset Liquidation	_		
Line 7	Third-Party Litigation Income	780.02		
Line 8	Miscellaneous - Other	_		
	Total Funds Available (Lines 1 - 8):		3,800.04	2,333,849.89
	Decreases in Fund Balance:		,	. ,
Line 9	Disbursements to Investors	_		
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	80,547.85		
Line 10b	Business Asset Expenses	-		
Line 10c	Personal Asset Expenses	-		
Line 10d	Investment Expenses	-		
Line 10e	Third-Party Litigation Expenses	-		
	1. Attorney Fees	-		
	2. Litigation Expenses			
	Total Disbursements for Receivership Operations		80,547.85	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations			80,547.85
Line 11 Line 11a	Disbursements for Distribution Expenses Paid by the Fund:			
Line I Ia	Distribution Plan Development Expenses: 1. Fees:			
	Fund Administrator	_		
	Independent Distribution Consultant (IDC)	_		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Miscellaneous			
Line 11b	Total Plan Development Expenses Distribution Plan Implementation Expenses:		-	
Line 116	1. Fees:			
	Fund Administrator	-		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	3. Investor Identification:			
	Notice/Publishing Approved Plan	_		
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	Federal Account for Investor Restitution (FAIR) Reporting Expenses			
	Total Plan Implementation Expenses		_	
	Total Disbursements for Distribution Expenses Paid by the Fund	1	-	-
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):			80,547.85
Line 13	Ending Balance (As of 09/30/2025):			2,253,302.04
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		2,253,302.04	
Line 14b	Investments Other Assets or Ungleared Funds		2 206 700 00	
Line 14c	Other Assets or Uncleared Funds Total Ending Balance of Fund - Net Assets		3,206,709.90	5 /60 011 04
	Trotal Enting Dalance of Fully - Net Assets			5,460,011.94

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 07/01/2025 to 09/30/2025

OTHER SUPP	LEMENTAL INFORMATION:			
		Detail	Subtotal	Grand Total
 	Dishuses weath for Disa Administration Function Not Daid in the First			
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 15a	Plan Development Expenses Not Paid by the Fund 1. Fees:			
	Fund Administrator			
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	- I		
	3. Miscellaneous	-		
	Total Plan Development Expenses Not Paid by the Fund		-	
Line 15b	Plan Implementation Expenses Not Paid by the Fund:			
	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	— <u>-</u>		
,,	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	Disbursements to Court/Other Not Paid by the Fund			
Line 16a	Investment Expenses/CRIS Fees		-	
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund:			-
Line 17	DC & State Tax Payments			-
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period	-		
Line 18b	# of Claims Received Since Inception of Fund	485		
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period	-		
Line 19b	# of Claimants/Investors Paid Since Inception of Fund	417		

Geoff Winkler Receiver:

Geoff Winkler (printed name)

Chief Executive Officer American Fiduciary Services LLC Receiver, Profit Connect Wealth Services, Inc.

Date: October 31, 2025

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Geoff Winkler	Discuss tax software with SMB.	7/1/2025	0.1	340.00	34.00	Financial - Tax Issues
Anna Priebe	Communication with RLD regarding notice to investors.	7/1/2025	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	Email with AB regarding DH deposition.	7/1/2025	0.1	340.00	34.00	Legal - Case Administration
Renee Dieffenderfer	Email with KA and communication with AMP regarding notice to investors.	7/1/2025	0.1	255.00	25.50	Legal - Case Administration
Geoff Winkler	Discussion with counsel re Hayes deposition.	7/2/2025	0.2	340.00	68.00	Financial - Litigation Consulting
Anna Priebe	Meeting with SMB re: SFAR.	7/2/2025	0.2	215.00		Legal - Case Administration
Anna Priebe	Email RP re: pre-trial documents.	7/2/2025	0.1	215.00		Legal - Case Administration
Geoff Winkler	Email with RP regarding trial.	7/2/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler	Email with AB and KE regarding coordination of dates for deposition.	7/2/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler	Discussion with litigation counsel re trial schedule.	7/3/2025	0.4	340.00		Financial - Litigation Consulting
Anna Priebe	Share documents for pre-trial, emails with RP and GBW to prep documents.	7/3/2025	0.5	215.00		Legal - Case Administration
Anna Priebe	Noticing claimants of settlement motion.	7/3/2025	2.2	215.00		Legal - Case Administration
Anna Priebe	Email claimant re: second distribution.	7/3/2025	0.1	215.00		Legal - Case Administration
len Hardy	Returned call to investor regarding case updates and updated email address.	7/3/2025	0.1	200.00		Legal - Case Administration
Geoff Winkler	Review documents related to upcoming litigation and emails with AMP.	7/3/2025	0.4	340.00		Legal - Case Administration
Geoff Winkler	Email with RP regarding dates for trial.	7/3/2025	0.1	340.00		Legal - Case Administration
Renee Dieffenderfer	Emails with AMP and KA regarding notice for claimants.	7/3/2025	0.1	255.00		Legal - Case Administration
Anna Priebe	Meeting with RLD regarding issue with gmail and plan to send notice to remaining claimants.	7/7/2025	0.4	215.00		Legal - Case Administration
anna Priebe	Preparing excel tracking of bounced emails and notice to 110 claimants.	7/7/2025	0.9	215.00		Legal - Case Administration
unna Priebe	Emails to KA and KH re: emails bounced in claimant notices and confirmation of manual resend.		0.9	215.00		9
		7/7/2025				Legal - Case Administration
nna Priebe	Emails to two investors re: understanding claimant notices.	7/7/2025	0.2	215.00		Legal - Case Administration
en Hardy	Call from investor regarding Bank of America settlement.	7/7/2025	0.1	200.00		Legal - Case Administration
en Hardy	Meeting with RLD regarding inquiry from investor.	7/7/2025	0.1	200.00		Legal - Case Administration
lenee Dieffenderfer	Meeting with AMP regarding issue with Gmail and plan to send notice to remaining claimants.	7/7/2025	0.4	255.00		Legal - Case Administration
Renee Dieffenderfer	Notice to 151 claimants.	7/7/2025	0.7	255.00		Legal - Case Administration
Renee Dieffenderfer	Meeting with JLH regarding inquiry from investor.	7/7/2025	0.1	255.00		Legal - Case Administration
Geoff Winkler	Review materials to prepare for upcoming deposition. Research of litigation and settlement information for the purpose of responding to emailed	7/8/2025	0.8	340.00	272.00	Financial - Litigation Consulting
nna Priebe	questions for 2 investors, emailing them responses.	7/8/2025	0.4	215.00	86.00	Legal - Case Administration
Seoff Winkler	Email with AB, KE, and KH regarding deposition.	7/8/2025	0.1	340.00		Legal - Case Administration
Seoff Winkler	Email with RP regarding update on pre trial filing.	7/8/2025	0.1	340.00		Legal - Case Administration
Seoff Winkler	Hayes Deposition attendance until break.	7/9/2025	2.1	340.00		Financial - Litigation Consulting
Geoff Winkler	Hayes Deposition attendance until break.	7/9/2025	1.4	340.00		Financial - Litigation Consulting
Geoff Winkler	Hayes Deposition attendance until break.	7/9/2025	1.8	340.00		Financial - Litigation Consulting
Geoff Winkler	Hayes Deposition attendance until break.	7/9/2025	1.3	340.00		Financial - Litigation Consulting
Geoff Winkler	Prepare for deposition by reading supporting materials.	7/9/2025	1.7	340.00		Financial - Litigation Consulting
	Email with JM regarding deadline on offers.					
Geoff Winkler	Email with JM and KH regarding potential settlement.	7/9/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler		7/9/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler	Email with KP regarding four deposits.	7/9/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler	Discussion with litigation counsel re upcoming trial, potential settlement, counsel KH.	7/10/2025	0.4	340.00		Financial - Litigation Consulting
nna Priebe	Communication with SMB re: accounting for stopped checks in SFAR for Q2.	7/10/2025	0.1	215.00		Legal - Case Administration
nna Priebe	Email counsel re: updating litigation section of status report.	7/10/2025	0.1	215.00		Legal - Case Administration
nna Priebe	Email GBW re: follow up to pre-trial review.	7/10/2025	0.1	215.00		Legal - Case Administration
nna Priebe	Prepare and publish new pleading to investor site.	7/10/2025	0.1	215.00		Legal - Case Administration
nna Priebe	Reviewing investor responses to settlement notice.	7/10/2025	0.1	215.00		Legal - Case Administration
nna Priebe	Drafting status report.	7/10/2025	0.4	215.00		Legal - Case Administration
en Hardy	Returned call to investor regarding recent settlement and future distribution.	7/10/2025	0.2	200.00		Legal - Case Administration
Geoff Winkler	Email with JM regarding date for final payment.	7/10/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler	Email with JM regarding status up date on settlement.	7/10/2025	0.1	340.00		Legal - Case Administration
Geoff Winkler	Reconcile bank accounts.	7/11/2025	0.2	340.00	68.00	Financial - Accounting/Auditing
Geoff Winkler	Review real estate investigation into subject for mediation and review summary of properties. Real estate investigation into subject for mediation per GBW request, summary of properties re:	7/11/2025	0.6	340.00	204.00	Financial - Litigation Consulting
ohn Hall	same.	7/11/2025	1.8	310.00	558.00	Financial - Litigation Consulting

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
eoff Winkler	Email with RP regarding travel for trial.	7/11/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	Emails with JBH, JM, and RP regarding settlement communication.	7/11/2025	0.1	340.00		Legal - Case Administration
ra Bond	Review and categorization of Q2 register entries for SFAR.	7/14/2025	0.5	255.00	127.50	Legal - Case Administration
eoff Winkler	Review invoices for payment and email AMP re: same.	7/15/2025	0.2	340.00	68.00	Financial - Accounting/Auditing
na Priebe	Email JLH re: outstanding investor communication.	7/15/2025	0.1	215.00		Legal - Case Administration
na Priebe	Drafting status report with register exhibit.	7/15/2025	0.5	215.00		Legal - Case Administration
na Priebe	Review invoice for payment and email GBW re: same.	7/15/2025	0.2	215.00		Legal - Case Administration
n Hardy	Email to AMP regarding outstanding investor communication. Review proposed settlement agreement, motion (.3), discuss with litigation counsel and local	7/15/2025	0.1	200.00		Legal - Case Administration
off Winkler	counsel (.2).	7/16/2025	0.5	340.00	170.00	Financial - Litigation Consulting
na Priebe	Email and follow up call with GBW re: reviewing draft motion and complaint. Reviewing draft motion and complaint, confirming numbers, tracking changes, and email KH	7/16/2025	0.2	215.00		Legal - Case Administration
na Priebe	feedback.	7/16/2025	1.5	215.00	322.50	Legal - Case Administration
ra Bond	Preparation of Q2 SFAR.	7/16/2025	0.2	255.00	51.00	Legal - Case Administration
off Winkler	Email and follow up call with AMP re: reviewing draft motion and complaint.	7/16/2025	0.2	340.00	68.00	Legal - Case Administration
off Winkler	Email with AMP regarding drafted complaint and motion.	7/16/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	Call with AMP re: reviewing draft motion and complaint.	7/16/2025	0.1	340.00	34.00	Legal - Case Administration
n Hardy	Returned call to investor regarding Bank of America settlement.	7/17/2025	0.1	200.00	20.00	Legal - Case Administration
off Winkler	Email with KH and AMP regarding confirmation of numbers and drafted complaint. Review and further edits to motion for settlement, discuss with counsel KH re submission to KW	7/17/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	and TM.	7/18/2025	0.3	340.00	102.00	Financial - Litigation Consulting
off Winkler	Asset search and review of potential assets re third party litigation.	7/21/2025	2.2	340.00	748.00	Legal - Asset Analysis and Recovery
off Winkler	Review Hayes offer of judgement, discuss with counsel.	7/22/2025	0.3	340.00	102.00	Financial - Litigation Consulting
off Winkler	Further search and review of potential assets re third party litigation.	7/22/2025	1.3	340.00	442.00	Legal - Asset Analysis and Recovery
off Winkler	Email with KE regarding notification of service.	7/22/2025	0.1	340.00	34.00	Legal - Case Administration
nee Dieffenderfer	Email with EG regarding Offer of Judgement.	7/23/2025	0.1	255.00	25.50	Legal - Case Administration
off Winkler	Call with counsel to discuss motion to pursue employees and promoters.	7/24/2025	0.3	340.00	102.00	Financial - Litigation Consulting
na Priebe	Email investor re: BOA settlement question.	7/24/2025	0.1	215.00	21.50	Legal - Case Administration
ungmi Yoo	Review IRS tax notice regarding penalties.	7/25/2025	0.2	250.00	50.00	Financial - Tax Issues
ungmi Yoo	Trace filing date of 2021 return to resolve IRS tax notice.	7/25/2025	0.1	250.00	25.00	Financial - Tax Issues
off Winkler	Review tax documents and emails with SMB, SMY, and JBH.	7/25/2025	0.2	340.00	68.00	Financial - Tax Issues
nn Hall	Review tax notice and discuss with SMB and SMY.	7/25/2025	0.3	310.00	93.00	Financial - Tax Issues
	Emailing claimant re: right to objection, reviewing attempted objection, and emailing JLH re:					
na Priebe	further communication with claimant.	7/25/2025	0.3	215.00	64.50	Legal - Case Administration
n Hardy	Review of physical tax documents received and forwarding to GBW, JBH, SMB & SMY.	7/25/2025	0.3	200.00	60.00	Legal - Case Administration
n Hardy	Communication with GBW regarding procedure for distributing incoming tax notifications.	7/25/2025	0.1	200.00	20.00	Legal - Case Administration
n Hardy	Meeting with RLD regarding third party checks and timeline for distribution.	7/25/2025	0.1	200.00	20.00	Legal - Case Administration
n Hardy	Processing third party check and communication with GBW re: same.	7/25/2025	0.2	200.00	40.00	Legal - Case Administration
off Winkler	Communication with JLH regarding procedure for distributing incoming tax notifications.	7/25/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	Communication with JLH regarding procedure for distributing incoming tax notifications.	7/25/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	Processing third party check and communication with JLH re: same.	7/25/2025	0.2	340.00	68.00	Legal - Case Administration
enee Dieffenderfer	Meeting with JLH regarding third party checks and timeline for distribution. Review of tax notice received for 2021 and request of SMY to request transcript to see why the	7/25/2025	0.1	255.00		Legal - Case Administration
ra Bond	notice was received.	7/28/2025	0.3	255.00		Financial - Tax Issues
ungmi Yoo	Discussion with RLD re: 2021 tax return timing.	7/28/2025	0.3	250.00		Financial - Tax Issues
ungmi Yoo	Review email communication between GBW, JPM and BK to track timeline of 2021 tax return. List the findings related to the 2021 tax return (0.2) and email GBW, SMB, and EC regarding the	7/28/2025	0.5	250.00		Financial - Tax Issues
ungmi Yoo	IRS notice.	7/28/2025	0.3	250.00		Financial - Tax Issues
off Winkler	Review email communication between SMY, JPM and BK to track timeline of 2021 tax return. Review findings related to the 2021 tax return and emails with SMY, SMB, and EC regarding the	7/28/2025	0.2	340.00		Financial - Tax Issues
off Winkler	IRS notice.	7/28/2025	0.2	340.00	68.00	Financial - Tax Issues
nee Dieffenderfer	Review of emails pertaining to 2021 tax return.	7/28/2025	0.4	255.00	102.00	Financial - Tax Issues
nee Dieffenderfer	Discussion with SMY re: 2021 tax return timing.	7/28/2025	0.3	255.00	76.50	Financial - Tax Issues
nna Priebe	Meeting with SMB re: finalizing sfar for report.	7/28/2025	0.1	215.00	21.50	Legal - Case Administration

SEC v. Profit Connect Wealth Services, Inc. et al. Summary of Fees of Receiver and Retained Personnel July 1, 2025 - September 30, 2025 (Sorted in Chronological Order by Activity Category)

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Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
nna Priebe	Meeting with GBW, RLD, and JLH re: communication with claimants re: potential settlement.	7/28/2025	0.1	215.00	21.50	Legal - Case Administration
na Priebe	Email claimant re: objection to settlement.	7/28/2025	0.1	215.00	21.50	Legal - Case Administration
ra Bond	Communication with RLD regarding SFAR.	7/28/2025	0.1	255.00	25.50	Legal - Case Administration
a Bond	Meeting with GBW re: balance sheet updates for SFAR.	7/28/2025	0.1	255.00	25.50	Legal - Case Administration
ra Bond	Meeting with AMP re: finalizing sfar for report.	7/28/2025	0.1	255.00	25.50	Legal - Case Administration
off Winkler	Meeting with AMP, RLD, and JLH re: communication with claimants re: potential settlement.	7/28/2025	0.1	340.00		Legal - Case Administration
off Winkler	Meeting with SMB re: balance sheet updates for SFAR.	7/28/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	SMB.	7/28/2025	0.3	340.00		Legal - Case Administration
off Winkler	Meeting with AMP, RLD, and JLH re: communication with claimants re: potential settlement. Meeting with GBW, AMP, and JLH regarding status report and claimant communication regarding	7/28/2025	0.1	340.00	34.00	Legal - Case Administration
nee Dieffenderfer	BOA settlement.	7/28/2025	0.1	255.00	25.50	Legal - Case Administration
a Priebe	Finalizing status report draft and exhibits, requesting review.	7/29/2025	0.4	215.00	86.00	Legal - Case Administration
na Priebe	Email KA and KH re: follow up on litigation section of status report.	7/29/2025	0.1	215.00	21.50	Legal - Case Administration
a Priebe	Preparing wire and email GBW re: signing.	7/29/2025	0.2	215.00	43.00	Legal - Case Administration
a Priebe	Emails with subpoena payment confirmation.	7/29/2025	0.2	215.00	43.00	Legal - Case Administration
ff Winkler	Prepare and verify wires.	7/29/2025	0.3	340.00	102.00	Legal - Case Administration
off Winkler	Email with KH and AMP regarding payment.	7/29/2025	0.1	340.00	34.00	Legal - Case Administration
off Winkler	Email with EWB regarding wire to DWT.	7/29/2025	0.1	340.00	34.00	Legal - Case Administration
nee Dieffenderfer	Review of drafted status report; communication and emails with AMP re: same.	7/30/2025	0.4	255.00	102.00	Financial - Status Reports
a Priebe	Email RLD re: status report review.	7/30/2025	0.1	215.00	21.50	Legal - Case Administration
a Priebe	Email KH re: litigation section follow up.	7/30/2025	0.1	215.00		Legal - Case Administration
nee Dieffenderfer	Email with EG regarding Notice of Deposition.	7/30/2025	0.1	255.00	25.50	Legal - Case Administration
off Winkler	Email with AMP regarding report filing.	7/31/2025	0.1	340.00		Financial - Status Reports
a Priebe	Reviewing feedback of status report and sending to GBW for approval.	7/31/2025	0.2	215.00		Legal - Case Administration
a Priebe	Emails with KA and KH re: report and submission.	7/31/2025	0.2	215.00		Legal - Case Administration
a Priebe	Communication with RLD regarding investor emails.	7/31/2025	0.1	215.00		Legal - Case Administration
ff Winkler	Communication with RLD regarding BOA and litigation.	7/31/2025	0.1	340.00		Legal - Case Administration
off Winkler	Reviewing feedback of status report and sending to AMP for approval.	7/31/2025	0.2	340.00		Legal - Case Administration
nee Dieffenderfer	Communication with AMP regarding investor emails.	7/31/2025	0.2	255.00		Legal - Case Administration Legal - Case Administration
ice Dielieriderier	Emails with multiple investors regarding questions about BOA, distributions, timelines, and	775172025	0.1	255.00	25.50	Legal - Oase Administration
nee Dieffenderfer	requests to change contact information.	7/31/2025	0.4	255.00	102.00	Legal - Case Administration
nee Dieffenderfer	Review of investor contact information in Verita.	7/31/2025	0.1	255.00	25.50	Legal - Case Administration
ee Dieffenderfer	Communication with GBW regarding BOA and litigation.	7/31/2025	0.1	255.00		Legal - Case Administration
n Hall	review tax notice and discuss response with SMB.	8/3/2025	0.3	310.00		Financial - Tax Issues
a Priebe	Research hardship application and email KH re: same.	8/4/2025	0.2	215.00		Legal - Asset Analysis and Recovery
off Winkler	Discussion with AMP and counsel KH re clawback litigation.	8/4/2025	0.3	340.00		Legal - Asset Analysis and Recovery
off Winkler	Email from counsel re EG update.	8/4/2025	0.1	340.00		Legal - Asset Analysis and Recovery
a Priebe	Scheduling Receiver call for investors.	8/4/2025	0.2	215.00		Legal - Case Administration
a Priebe	Email re: question for next receivership call.	8/4/2025	0.1	215.00		Legal - Case Administration
a Priebe	Email CR re: investor call meeting set up.	8/4/2025	0.1	215.00		Legal - Case Administration
ia i nebe	Meeting with RLD, GBW, GJM, and JLH regarding investor questions regarding settlement, BOA,	0/4/2023	0.1	215.00	21.50	Legal - Oase Administration
na Priebe	and investor meeting.	8/4/2025	0.3	215.00	64.50	Legal - Case Administration
Hardy	Call from investor regarding Bank of America settlement. Meeting with RLD, AMP, GJM, and JLH regarding investor questions regarding settlement, BOA,	8/4/2025	0.2	200.00		Legal - Case Administration
off Winkler	and investor meeting.	8/4/2025	0.3	340.00	102.00	Legal - Case Administration
	Meeting with GBW, AMP, GJM, and JLH regarding investor questions regarding settlement, BOA,					-
nee Dieffenderfer	and investor meeting.	8/4/2025	0.3	255.00	76.50	Legal - Case Administration
nee Dieffenderfer	Email with AMP regarding investor meeting.	8/4/2025	0.1	255.00	25.50	Legal - Case Administration
nee Dieffenderfer	Email with investor regarding question about BOA settlement.	8/4/2025	0.1	255.00	25.50	Legal - Case Administration
off Winkler	Call with DS and VA re case status and next steps, document needs.	8/5/2025	0.8	340.00	272.00	Legal - Case Administration
na Priebe	Communication with JLH and RLD re: upcoming meeting and communication with investors.	8/6/2025	0.1	215.00		Legal - Case Administration
na Priebe	claims.	8/6/2025	0.4	215.00		Legal - Case Administration
	Prepare question submission, update investor site, and send mass email notice of upcoming					ŭ
na Priebe	meeting with Receiver.	8/6/2025	0.5	215.00	107 50	Legal - Case Administration

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Geoff Winkler	Review timing and schedule investor call.	8/6/2025	0.2	340.00	68.00	Legal - Case Administration
eoff Winkler	claims.	8/6/2025	0.4	340.00	136.00	Legal - Case Administration
enee Dieffenderfer	Communication with AMP and JLH regarding investor meeting.	8/6/2025	0.1	255.00	25.50	Legal - Case Administration
hn Hall	claims.	8/6/2025	0.4	310.00	124.00	Legal - Case Administration
eoff Winkler	Review motion and proposed order re settlement with JN.	8/7/2025	0.3	340.00	102.00	Financial - Litigation Consulting
eoff Winkler	Call with litigation counsel re proposed settlement.	8/7/2025	0.3	340.00	102.00	Financial - Litigation Consulting
enee Dieffenderfer	Email with EG regarding Affidavit of Service.	8/7/2025	0.1	255.00	25.50	Legal - Case Administration
eoff Winkler	Reconcile bank accounts.	8/8/2025	0.2	340.00	68.00	Financial - Accounting/Auditing
eoff Winkler	Email to counsel re Nicholas settlement.	8/8/2025	0.1	340.00	34.00	Legal - Case Administration
	Emails with denied claimant re: hardship application for recovery and email KH re: questions on					•
na Priebe	hardship.	8/11/2025	0.3	215.00	64.50	Legal - Asset Analysis and Recovery
na Priebe	Email JLH re: outstanding investor communication.	8/11/2025	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
na Priebe	Five emails with investors re: questions on case updates, distributions, and recovery.	8/11/2025	0.5	215.00	107.50	Legal - Case Administration
	Create secure document invite for hardship claim and email potential claimant re: methods for					
na Priebe	upload.	8/12/2025	0.2	215.00		Legal - Asset Analysis and Recovery
na Priebe	Email hardship claimant re: application status.	8/13/2025	0.1	215.00		Legal - Asset Analysis and Recovery
na Priebe	Email KH and GBW re: hardship application status.	8/13/2025	0.1	215.00		Legal - Asset Analysis and Recovery
na Priebe	Communication and download with Stretto re: case data and banking.	8/13/2025	0.1	215.00		Legal - Case Administration
na Priebe	Meeting with RLD, GBW, GJM, and JLH regarding third party litigation.	8/13/2025	0.1	215.00		Legal - Case Administration
na Priebe	High-level review of hardship claim documents.	8/13/2025	0.3	215.00	64.50	Legal - Case Administration
eoff Winkler	Emails with KH and AMP re: hardship application status (.1), review documents (.2).	8/13/2025	0.3	340.00	102.00	Legal - Case Administration
**	Review order approving motion to pursue promoters, follow up with counsel KH, email from	0/40/000=				
off Winkler	counsel AB re settlement, review response from KH re posture.	8/13/2025	0.4	340.00		Legal - Case Administration
off Winkler	Meeting with RLD, AMP, GJM, and JLH regarding third party litigation.	8/13/2025	0.1	340.00		Legal - Case Administration
off Winkler	Process and verify wire out.	8/14/2025	0.2	340.00		Financial - Accounting/Auditing
off Winkler	Call with litigation counsel to discuss DH case.	8/14/2025	0.4	340.00		Financial - Litigation Consulting
off Winkler	Call with counsel KH re Hayes litigation and updated complaint.	8/14/2025	0.3	340.00		Financial - Litigation Consulting
na Priebe	Review of hardship application and documents.	8/14/2025	0.4	215.00		Legal - Asset Analysis and Recovery
na Priebe	Email KH and GBW re: hardship review.	8/14/2025	0.1	215.00		Legal - Asset Analysis and Recovery
na Priebe	Email hardship claimant re: review process.	8/14/2025	0.1	215.00		Legal - Asset Analysis and Recovery
off Winkler	Email KH and AMP re: hardship review.	8/14/2025	0.1	340.00		Legal - Case Administration
na Priebe	Email KH re: hardship applicant.	8/15/2025	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
na Priebe	Review of claimant objection (.2) and respond requesting confirmation (.1).	8/15/2025	0.3	215.00	64.50	Legal - Asset Analysis and Recovery
na Priebe	Communication with JLH re: claimant settlement communication.	8/15/2025	0.1	215.00	21.50	Legal - Case Administration
	Returned call to investor regarding access to upcoming investor meeting and future distribution	0/45/0005			40.00	
n Hardy	status.	8/15/2025	0.2	200.00		Legal - Case Administration
off Winkler	Emails with KH and AMP re: settlement objection (.2), discuss with AMP (.4).	8/18/2025	0.6	340.00		Financial - Litigation Consulting
na Priebe	Email KH re: hardship application.	8/18/2025	0.1	215.00		Legal - Case Administration
na Priebe	Emails with KH and GBW re: settlement objection (.2), discuss with GBW (.4).	8/18/2025	0.6	215.00		Legal - Case Administration
na Priebe	Meeting with GBW, GJM, and RLD regarding third party litigation.	8/18/2025	0.1	215.00		Legal - Case Administration
na Priebe	Call back hardship claimant to answer outstanding questions.	8/18/2025	0.1	215.00		Legal - Case Administration
off Winkler	Meeting with AMP, GJM, and RLD regarding third party litigation.	8/18/2025	0.1	340.00		Legal - Case Administration
na Priebe	Review of hardship claim.	8/19/2025	1.0	215.00		Legal - Asset Analysis and Recovery
off Winkler	Email with counsel KE re inquiry on BK case.	8/19/2025	0.1	340.00		Legal - Case Administration
off Winkler	Call with interested party to discuss BK case.	8/19/2025	0.4	340.00		Legal - Case Administration
off Winkler	Call with MM to discuss third party litigation.	8/19/2025	0.4	340.00		Legal - Case Administration
na Priebe	Preparing request and communication to hardship claimant for further analysis.	8/20/2025	0.3	215.00		Legal - Asset Analysis and Recovery
na Priebe	Discussion with GBW re: hardship application.	8/20/2025	0.2	215.00	43.00	Legal - Asset Analysis and Recovery
na Priebe	Meeting with KH re: hardship claim.	8/20/2025	0.4	215.00	86.00	Legal - Asset Analysis and Recovery
off Winkler	Discussion with AMP re: hardship application.	8/20/2025	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
off Winkler	Discussion with counsel KH re proposed mediation and expert costs in Hayes litigation.	8/21/2025	0.2	340.00	68.00	Financial - Litigation Consulting
eoff Winkler	Call with litigation counsel to discuss experts and upcoming mediation.	8/21/2025	0.3	340.00	102.00	Financial - Litigation Consulting
off Winkler	Call with counsel KH to discuss upcoming mediation, expenses, email to litigation counsel AB.	8/21/2025	0.3	340.00	102.00	Financial - Litigation Consulting

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
eoff Winkler	Call with counsel KH to discuss next steps in DH litigation.	8/25/2025	0.4	340.00	136.00	Financial - Litigation Consulting
ileen Castle	Summarize activity for 2024; Review 2023 and compare two years. Update 2024 workpapers for the QSF and the entity and coordinate reporting for both to be	8/25/2025	2.1	395.00	829.50	Financial - Tax Issues
ileen Castle	consistant.	8/25/2025	1.5	395.00	592.50	Financial - Tax Issues
lleen Castle	Review files and updates to tracker as needed.	8/25/2025	0.2	395.00	79.00	Financial - Tax Issues
nna Priebe	Email hardship claimant re: status of application.	8/25/2025	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
nna Priebe	Preparation of call agenda with investors, reviewing submitted questions and preparing for clarity.	8/25/2025	0.5	215.00	107.50	Legal - Case Administration
nna Priebe	Email investor re: questions for call agenda.	8/25/2025	0.1	215.00	21.50	Legal - Case Administration
nna Priebe	Emails with KH and KA re: review of investor call agenda.	8/25/2025	0.3	215.00	64.50	Legal - Case Administration
nna Priebe	Update investor site with Receiver call information and send mass email reminder and meeting link to investors.	8/25/2025	0.3	215.00		Legal - Case Administration
eoff Winkler	Review email from KW and KH re clear to file.	8/26/2025	0.1	340.00		Legal - Case Administration
eoff Winkler	Review documents in preparation for MW deposition tomorrow.	8/27/2025	1.3	340.00		Financial - Litigation Consulting
ra Bond	Meeting with EC and SMY re: deadlines approaching and needed items for finalization of returns.	8/27/2025	0.1	255.00		Financial - Tax Issues
een Castle	Meet with tax team to identify information needed to complete tax return preparation.	8/27/2025	0.1	395.00		Financial - Tax Issues
	Meeting with SMB and EC regarding the status of the tax returns and the nature of assets and liabilities.					
eungmi Yoo	Review tax update from SMB and answer questions.	8/27/2025	0.1	250.00		Financial - Tax Issues
eoff Winkler	Meeting with RLD, GJM, JLH, and GBW regarding status of settlement objections and upcoming	8/27/2025	0.2	340.00		Financial - Tax Issues
na Priebe	investor call. Meeting with RLD, GJM, JLH, and AMP regarding status of settlement objections and upcoming	8/27/2025	0.1	215.00		Legal - Case Administration
eoff Winkler	investor call.	8/27/2025	0.1	340.00		Legal - Case Administration
enee Dieffenderfer	Communication with SMY regarding outcome of case.	8/27/2025	0.1	255.00		Legal - Case Administration
eoff Winkler	Attend first session of MW deposition in Hayes litigation. Meeting with SMY and RLD regarding tax return status, amounts due to investors and assets	8/28/2025	1.3	340.00	442.00	Financial - Litigation Consulting
ra Bond	transferred to the QSF.	8/28/2025	0.2	255.00	51.00	Financial - Tax Issues
ra Bond	Drafting email to GBW, RLD, AMP, SMY, and EC re: final pieces needed for tax returns. Meeting with SMB and RLD regarding tax return status, amounts due to investors and assets	8/28/2025	0.2	255.00	51.00	Financial - Tax Issues
eungmi Yoo	transferred to the QSF. Meeting with SMY and SMB regarding tax return status, amounts due to investors and assets	8/28/2025	0.2	250.00	50.00	Financial - Tax Issues
enee Dieffenderfer	transferred to the QSF.	8/28/2025	0.2	255.00	51.00	Financial - Tax Issues
na Priebe	Communication with SMB re: tax questions for assets and email follow up.	8/28/2025	0.2	215.00	43.00	Legal - Case Administration
na Priebe	Email two investors re: distributions and settlement objection.	8/28/2025	0.2	215.00	43.00	Legal - Case Administration
off Winkler	Prepare for investor call.	8/28/2025	0.3	340.00	102.00	Legal - Case Administration
off Winkler	Call with investors and follow up.	8/28/2025	0.3	340.00		Legal - Case Administration
off Winkler	Attend second part of MW deposition in Hayes case.	8/28/2025	1.2	340.00		Legal - Case Administration
eoff Winkler	Attend third part of MW deposition in Hayes litigation.	8/28/2025	1.1	340.00		Legal - Case Administration
enee Dieffenderfer	Email with EG regarding Deposition.	8/28/2025	0.1	255.00		Legal - Case Administration
eoff Winkler	Review memo re final pieces needed for tax returns, timing for case.	8/29/2025	0.2	340.00		Financial - Tax Issues
na Priebe	Email investor re: recording of meeting.	8/29/2025	0.1	215.00		Legal - Case Administration
na Priebe	Preparing investor numbers for EC for taxes.	9/2/2025	0.5	215.00		Legal - Case Administration
na Priebe	Email SMB and EC re: asset and investor payment information.	9/2/2025	0.5	215.00		Legal - Case Administration
	Research questions from DS, prepare memo response.	9/2/2025		340.00		3
off Winkler			0.8			Legal - Case Administration
nee Dieffenderfer	Email with EG regarding Deposition.	9/2/2025	0.1	255.00		Legal - Case Administration
na Priebe	Prepare form 2 for 2024 and email to EC.	9/3/2025	0.2	215.00		Financial - Tax Issues
na Priebe	Call with EC and SMY re: assets for 2024 and summation of activity for tax purposes.	9/3/2025	0.4	215.00		Financial - Tax Issues
na Priebe	Discuss with SMB and SMY re: documents required for asset review for 2024 taxes.	9/3/2025	0.2	215.00		Financial - Tax Issues
ra Bond	Follow up with SMY regarding EC's tax-related document request.	9/3/2025	0.1	255.00		Financial - Tax Issues
ra Bond	Processing 2024 form 1 and 2 for EC tax preparation.	9/3/2025	0.2	255.00		Financial - Tax Issues
ra Bond	Review of tax return workpapers with EC re: 2024 tax return and form 1 and 2 review.	9/3/2025	0.2	255.00	51.00	Financial - Tax Issues
ra Bond	Meeting with SMY and AMP regarding EC's questions on the tax return and workpapers.	9/3/2025	0.2	255.00	51.00	
leen Castle	Summarize 2024 transactions from Form 2 and compare to tax workpapers summarization. Update to tax workpapers for entity preparing asset transfer entries to QSF; update tax	9/3/2025	2.4	395.00	948.00	Financial - Tax Issues
een Castle	workpapers for QSF and coordinate entries with entity return for 2024.	9/3/2025	2.1	395.00	829.50	Financial - Tax Issues

rem Cambel Confishes with neview of From 2 and updates to 18x workgopens for entity and CSF. Print Dickels from prace for lax return preparation purposes. 9/3/2025 Print Dickels from prace for lax return preparation purposes. 9/3/2025 Print Dickels from prace for lax return preparation purposes. 9/3/2025 Print Dickels from prace for lax return preparation purposes. 9/3/2025 Print Dickels from prace for lax return preparation purposes. 9/3/2025 Print Dickels from prace for lax return prac	Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Les Cabille Commission with review of From 2 and spontane to its a vordisponent for eithy and QSF. 1.1 395.00 43.5 Financial - Tax Issues 1.2 20.00 23.0 D Fin	Eileen Castle	Meet with staff for status update on tax return preparation.	9/3/2025	0.2	395.00	79.00	Financial - Tax Issues
Impair No	Eileen Castle	Continue with review of Form 2 and updates to tax workpapers for entity and QSF.			395.00	434.50	Financial - Tax Issues
Persistant Per	Seungmi Yoo	Print Docket from pacer for tax return preparation purpose.	9/3/2025	0.1	250.00	25.00	Financial - Tax Issues
Discussion with EC are AMP regarding 2004 tax workspapen. 90.0025 0.4 25.00 50.00 Financial - Tax besses	Seungmi Yoo	Review the docket to capture any taxable event.	9/3/2025	0.9	250.00	225.00	Financial - Tax Issues
Discussion with AME* regarding tax support documents. 1907/205 0.2 25.00 50.00 Francisi 1-Tax Issues 1907/205 1907/205 10.1 25.00 50.00 Francisi 1-Tax Issues 1907/205 10.1 25.00 25.00 Francisi 1-Tax Issues 1907/205 10.1 25.00 25.00 Francisi 1-Tax Issues 1907/205 25.00 25.00 Francisi 1-Tax Issues 1907/205 25.00 25.00 Francisi 1-Tax Issues 1907/205 25.00 25.00 1907/205 25.00 25.00 1907/205 25.00	Seungmi Yoo	Discussion with EC and AMP regarding 2024 tax workpapers.	9/3/2025	0.4	250.00	100.00	Financial - Tax Issues
Meeting with SMB and AMPregarding ECAE** questons on the tax return and workpapers. 90,2025 0.1 250.00 50.00 Financial - Tax Issues	Seungmi Yoo	Discussion with AMP regarding tax support documents.		0.2	250.00	50.00	Financial - Tax Issues
Follow by with SMB regarding (5C4)** has related occurrent request. 93/2025 0.1 250.00 25.00 Follow 1.2	Seungmi Yoo	Meeting with SMB and AMP regarding EC's guestions on the tax return and workpapers.					
Email Ari he potential objection to settlement. 8 Private Email 2 investors or emelling recording questions. 8 Private 8 Review email from ligitation counsel in settlement flunds, pull requested information, discuss with counsel. 8 Review email from ligitation counsel in settlement flunds, pull requested information, discuss with counsel. 9 A42025 0.3 340.00 102.00 Financial - Ligitation Consulting control in the class of the counsel. 9 A42025 0.3 340.00 102.00 Financial - Ligitation Consulting control in the class of the class of the counsel. 9 A42025 0.3 340.00 102.00 Financial - Ligitation Consulting counsel. 9 A42025 0.3 340.00 102.00 Financial - Ligitation Consulting counsel. 9 A42025 0.3 340.00 102.00 Financial - Ligitation Consulting counsel. 9 A42025 0.3 340.00 102.00 Financial - Ligitation Consulting counsel. 9 A42025 0.3 340.00 102.00 Financial - Tax Issuese. 9 A42025 0.3 340.00 102.00 Financial - Tax Issuese. 9 A42025 0.3 340.00 102.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 250.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial - Tax Issuese. 9 A42025 0.3 250.00 100.00 Financial -	Seungmi Yoo						
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Review email from itagation coursed re-settlement funds, pull requested information, discuss with coursed. Research VD claim, review interview notes, search relativity for VD information. 94/2025 0.3 34,00 30,00 102.00 Financial - Ligistion Consulting of Vinkeler Research VD claim, review interview notes, search relativity for VD information. 94/2025 0.3 340,00 300,00 Financial - Ligistion Consulting of Vinkeler Operation of Vinkeler Operation of Vinkeler To prepare consistent tax returns and workpapers. 10 prepare consistent tax formations. 10 prepare consistent tax returns and workpapers. 10 prepare consistent tax formations. 10 prepare consistent tax returns and workpapers. 10 prepare consistent	nna Priebe	·					•
In Winkler In Case and Case Overview of data and preparation of questions for clarity, frow WD plantmation. Proview of plant and an preparation of questions for clarity, meet with GWI Review 201986/2023 has workpapers from BT and analyze has treatments of various transactions to prepare consistent tax returns and workpapers. Darli for K-1s.							g
See Cases Overview of data and preparation of questions for clarity, meet with GW. Review 2018/84/2025 at 197.5 Financial - Tax Issues Fin	Geoff Winkler	counsel.	9/4/2025	0.3	340.00	102.00	Financial - Litigation Consulting
Review 201986*2023 iax workspapers from 81 and analyze lax treatments of various transactions to prepare consistent tax returns and workspapers. yarmy Yoo Draft for K-1s. yarmy Yoo Draft for K-1s. yarmy Yoo Draft for K-1s. yarmy Yoo Review QSF and entity tax workspapers, including transferred assets and gain recognition. yarmy Yoo Review QSF and entity tax workspapers, including transferred assets and gain recognition. yarmy Yoo Review QSF and entity tax workspapers, including transferred assets and gain recognition. yarmy Yoo Review QSF and entity tax workspapers, including transferred assets and gain recognition. yarmy Yoo Review QSF and entity tax workspapers, including transferred assets and gain recognition. yarmy Yoo Prepare and review the orthate 2024 Prompt Determination. yarmy Yoo Review mitigal 2024 Form 1904 has twee received. yarmy Yoo Draft 2024 form 1120-S. yarmy Yoo Draft 2024 form 1120-S. yarmy Yoo Draft 2024 form 1120-S. yarmy Yoo Review displaced from 1120-S. yarmy Yoo Review displaced 2024 1120-SF (0.5) Email to EC for review (0.1). yarmy Yoo Review displaced 2024 1120-SF (0.5) Email to EC for review (0.1). yarmy Yoo Review displaced 2024 1120-SF (0.5) Email to EC for rev	Geoff Winkler	Research WD claim, review interview notes, search relativity for WD information.	9/4/2025	0.9	340.00	306.00	Financial - Litigation Consulting
Damit for K-15. 94/2025 0.8 250.00 100,00 Financial - Tax Issues 1/2	ileen Castle		9/4/2025	0.5	395.00	197.50	Financial - Tax Issues
Darlied Disclosure Statement A for attachment to Form 1120-S. Review Qaif and entity tax workspapers, including transferred assets and gain recognition. Review Qaif and entity tax workspapers, including transferred assets and gain recognition. Review Qaif and entity tax workspapers, including transferred assets and gain recognition. Review Qaif and entity tax workspapers, including transferred assets and gain recognition. Review Qaif are review the drafted 2024 Promot Determination. Review drafted form 1120-S. Review drafted	Seungmi Yoo	to prepare consistent tax returns and workpapers.	9/4/2025	1.0	250.00	250.00	Financial - Tax Issues
Darfied Disclosure Statement A for attachment to Form 1120-S. Review QST and entity tax workspapers, including transferred assets and gain recognition. Alv2025 0.8 250.00 200.00 Financial - Tax Issues ungmi Yoo Review gain on distribution of assets to QSF. Review QST and retity tax workspapers, including transferred assets and gain recognition. Alv2025 0.2 250.00 50.00 Financial - Tax Issues ungmi Yoo Review multiple 2024 Form 1099 that were received. Alv2025 0.2 250.00 50.00 Financial - Tax Issues ungmi Yoo Darf 2024 form 1120-S. Part 2024 form 1120-S. Review drafted form 1120-S.	eungmi Yoo	Draft for K-1s.	9/4/2025	0.4	250.00	100.00	Financial - Tax Issues
Name	eungmi Yoo	Drafted Disclosure Statement A for attachment to Form 1120-S.	9/4/2025	0.8	250.00	200.00	Financial - Tax Issues
Prepare and review the drafted 2024 Prompt Determination. 94/2025 0.5 250.00 125.00 Financial - Tax Issues Prepare and review the drafted 2024 Prompt Determination. 94/2025 0.5 250.00 50.00 Financial - Tax Issues 94/2025 0.5	eungmi Yoo	Review QSF and entity tax workpapers, including transferred assets and gain recognition.	9/4/2025	0.8	250.00	200.00	Financial - Tax Issues
Ingrim Yoo Draft 2024 From 1099 that were received. Marghi Yoo Part 2024 From 1099 that were received. 94/2025 0.8 25.00 20.00 Financial - Tax Issues 1.7 ms 1.7 ms	eungmi Yoo	Review gain on distribution of assets to QSF.	9/4/2025	0.2	250.00	50.00	Financial - Tax Issues
Ingrim Yoo Review multiple 20/24 Form 1099 that were received. 94/20/25 0.8 250.00 20.00 Financial - Tax Issues 1.7 miles 1	eungmi Yoo	Prepare and review the drafted 2024 Prompt Determination.					
ungmi Yoo	eungmi Yoo	Review multiple 2024 Form 1099 that were received.					
Ingrii Yoo Review drafted form 1120-S. 94/2025 0.3 25.00 75.00 Financial - Tax Issues 194/2025 0.6 25.00 15.00 Financial - Tax Issues 194/2025 0.6 25.00 194/2025 0.7 25.00 194/2025 0	eungmi Yoo	Draft 2024 form 1120-S.		0.8	250.00	200.00	Financial - Tax Issues
Imgrail Yoo Review 2024 tax return workpaper for form 1120-S. Imgrail Yoo Scan and document the executed Form 7004. Scan and t	•	Review drafted form 1120-S.					
Ingmir Yoo Scan and document the executed Form 7004. All Will EC to discuss tax return information. BY Will EC to discuss tax return information to questions from tax preparer. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax return with footnotes. BY Will EC to discuss tax	eungmi Yoo						
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	nna Priebe	of upload.	9/5/2025	0.5	215.00	107.50	Legal - Case Administration

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
anna Priebe	Communication with JLH and RLD re: meeting upload notice. Meeting with RLD, GJM, AMP, and JLH regarding status updates of hardship claim and change of	9/5/2025	0.1	215.00	21.50	Legal - Case Administration
Geoff Winkler	payee.	9/5/2025	0.1	340.00	34.00	Legal - Case Administration
enee Dieffenderfer	Email with AMP regarding Asset details for tax return.	9/5/2025	0.1	255.00	25.50	Legal - Case Administration
ileen Castle	Continue to update workpapers and review of tax return prepared by SY. Continue with review of 2024 workpapers updating for 1099 received under PCWS EIN; add	9/6/2025	1.1	395.00	434.50	Financial - Tax Issues
ileen Castle	notes to workpapers and disclosure statement.	9/8/2025	1.0	395.00	395.00	Financial - Tax Issues
eungmi Yoo	Developed a model and construct a balance sheet for tax return purposes.	9/8/2025	0.9	250.00	225.00	Financial - Tax Issues
eungmi Yoo	Investigate book to tax adjustment on balance sheet and profit and loss statement on tax return. Review non-employee cash and gifts from 2018â€"2021 and determined the appropriate tax	9/8/2025	0.5	250.00	125.00	Financial - Tax Issues
eungmi Yoo	treatment. Review asset related transactions from 2018–2021 for inclusion as depreciable assets on	9/8/2025	0.6	250.00		Financial - Tax Issues
eungmi Yoo	Schedule L of Form 1120-S.	9/8/2025	0.6	250.00		Financial - Tax Issues
eungmi Yoo	Review cash balances reported on the tax return for 2019-2021. Meeting with JBH to discuss the analysis of the shareholder loan balance for potential	9/8/2025	0.3	250.00		Financial - Tax Issues
eungmi Yoo	cancellation of debt.	9/8/2025	0.3	250.00		Financial - Tax Issues
eungmi Yoo	Review ownership structure based on the tax return and Form 2553.	9/8/2025	0.2	250.00		Financial - Tax Issues
eungmi Yoo	Review forensic accounting report and compared it to the tax return.	9/8/2025	0.3	250.00		Financial - Tax Issues
eungmi Yoo	Review EC's updates on the 2024 1120-S tax workpapers. Review tax treatments of shareholder distributions and retained earnings for tax years	9/8/2025	0.2	250.00		Financial - Tax Issues
eungmi Yoo	2018ê€"2021. Meeting with SMY to discuss the analysis of the shareholder loan balance for potential	9/8/2025	0.5	250.00		Financial - Tax Issues
ohn Hall	cancellation of debt.	9/8/2025	0.3	310.00		Financial - Tax Issues
nna Priebe	Meeting with RLD, JLH, GJM, and GBW regarding third party recovery update.	9/8/2025	0.1	215.00		Legal - Case Administration
na Priebe	Email KH re: potential objection to settlement.	9/8/2025	0.1	215.00		Legal - Case Administration
nna Priebe	Emails with 4 investors re: questions about settlement, website, and past meeting.	9/8/2025	0.4	215.00		Legal - Case Administration
nna Priebe	Meeting with MBB re: hardship applicant and recovery. Meeting with JBH and MBB to discuss the tax return status, discrepancies in ownership between	9/8/2025	0.1	215.00		Legal - Case Administration
eungmi Yoo	the tax return and Form 2553, and the shareholder loan analysis.	9/8/2025	0.2	250.00		Legal - Case Administration
eoff Winkler	Meeting with JBH and MBB re case status and next steps.	9/8/2025	0.1	340.00		Legal - Case Administration
eoff Winkler	Meeting with RLD, JLH, GJM, and AMP regarding third party recovery update. Meeting with MBB and SMY to discuss the tax return status, discrepancies in ownership between the tax status and Tax 2002-2004 the observabilities to provide the status of the st	9/8/2025	0.1	340.00		Legal - Case Administration
ohn Hall	the tax return and Form 2553, and the shareholder loan analysis.	9/8/2025	0.2	310.00		Legal - Case Administration
hn Hall	Meeting with GBW and MBB re case status and next steps. Analyze the accounting file and prepare a P&L and balance sheet to evaluate	9/8/2025	0.1	310.00		Legal - Case Administration
eungmi Yoo	shareholder/investor balances from 2018 to 2021.	9/9/2025	1.4	250.00		Financial - Tax Issues
eungmi Yoo	Analyze the accounting file based on tax return lines from 2018 through 2021. Prepare a note regarding the shareholder balance calculation for JBH (0.1) and email JBH the	9/9/2025	1.3	250.00		Financial - Tax Issues
eungmi Yoo	workbook and note (0.1). Analyze both the forensic accounting report and the tax returns/workpapers for tax years 2019- 2021 related to shareholder distributions and shareholder loan balances.	9/9/2025	0.2	250.00		Financial - Tax Issues Financial - Tax Issues
eungmi Yoo		9/9/2025	1.3 2.3	250.00 215.00		
nna Priebe	Hardship claim application review and analysis. Email BF re: hardship questions.	9/9/2025				Legal - Asset Analysis and Recovery
nna Priebe	Review email from WD re sale of Fillmore, discuss with counsel KE.	9/9/2025	0.1	215.00		Legal - Asset Analysis and Recovery
eoff Winkler	Discussion with counsel KH re WD counsel discussion, potential settlement.	9/9/2025	0.2	340.00		Legal - Asset Analysis and Recovery
eoff Winkler	**	9/9/2025	0.2	340.00		Legal - Asset Analysis and Recovery
nna Priebe	Email KH re: potential objection to settlement additional questions.	9/9/2025	0.2	215.00		Legal - Case Administration
nna Priebe	Discuss entity opening and closing under receivership tax questions with JBH and SMY. Prepare and review Form 4797 for the 2024 Form 1120-S.	9/10/2025	0.2	215.00 250.00		Financial - Tax Issues
eungmi Yoo	·	9/10/2025	0.3			Financial - Tax Issues
eungmi Yoo	Email the updated returns and statements to EC for review.	9/10/2025	0.1	250.00		Financial - Tax Issues
eungmi Yoo	Discuss entity opening and closing under receivership tax questions with AMP and JBH.	9/10/2025	0.2	250.00		Financial - Tax Issues
eungmi Yoo	Update and review the 2024 Form 1120-S related to other income and property sales.	9/10/2025	0.6	250.00		Financial - Tax Issues
ohn Hall	Discuss entity opening and closing under receivership tax questions with AMP and SMY.	9/10/2025	0.2	310.00		Financial - Tax Issues
nna Priebe	Review of additional information via email from hardship applicant and response.	9/10/2025	0.4	215.00		Legal - Asset Analysis and Recovery
nna Priebe	Email three investors re: updating contact, BOA settlement, and meeting recording.	9/10/2025	0.3	215.00		Legal - Case Administration
nna Priebe	Email GBW re: data transfer for claims into Stretto.	9/10/2025	0.1	215.00	21.50	Legal - Case Administration

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
nna Priebe	Reviewing stretto claimant data, confirming identity of 1 claimant and uploading new address.	9/10/2025	0.2	215.00	43.00	Legal - Case Administration
nna Priebe	Email Stretto re: claimant data.	9/10/2025	0.1	215.00	21.50	Legal - Case Administration
	Meeting with GBW, JEF, JBH, MBB, ORR, SMB, JLH, CZM, GJM, SMY and RLD regarding next					
nna Priebe	step of the case, tax treatment of the defendant's withdrawals, and ownership structure.	9/10/2025	0.1	215.00	21.50	Legal - Case Administration
ara Bond	Meeting with JBH, GBW, JEF, AMP, MBB, ORR, SMY, JLH, CZM, GJM, and RLD regarding next step of the case, tax treatment of the defendant's withdrawals, and ownership structure.	9/10/2025	0.1	255.00	25 50	Legal - Case Administration
iia boilu	Meeting with JBH, GBW, JEF, AMP, MBB, ORR, SMB, JLH, CZM, GJM, and RLD regarding next	9/10/2025	0.1	255.00	25.50	Legal - Case Administration
eungmi Yoo	step of the case, tax treatment of the defendant's withdrawals, and ownership structure.	9/10/2025	0.1	250.00	25.00	Legal - Case Administration
eoff Winkler	Email AMP re: data transfer for claims into Stretto.	9/10/2025	0.1	340.00		Legal - Case Administration
	Meeting with JBH, JEF, AMP, MBB, ORR, SMB, JLH, CZM, GJM, SMY and RLD regarding next					ŭ
eoff Winkler	step of the case, tax treatment of the defendant's withdrawals, and ownership structure.	9/10/2025	0.1	340.00	34.00	Legal - Case Administration
	Meeting with GBW, JEF, AMP, MBB, ORR, SMB, JLH, CZM, GJM, SMY and RLD regarding next	0//0/000=				
hn Hall	step of the case, tax treatment of the defendant's withdrawals, and ownership structure. Continue with review and update to 2024 workpapers and review of tax return; prepare disclosure	9/10/2025	0.1	310.00	31.00	Legal - Case Administration
een Castle	statement and notes to SY; review for signature and mailing.	9/11/2025	2.2	395.00	869.00	Financial - Tax Issues
ungmi Yoo	Reconcile capital gains reported by the QSF and the S corporation.	9/11/2025	0.4	250.00		Financial - Tax Issues
ungmi Yoo	Review the Form 4797 requirements regarding the date of sale.	9/11/2025	0.4	250.00		Financial - Tax Issues
ungmi Yoo	Update the 2024 Form 1120-S and supporting schedules based on EC's comments.	9/11/2025	0.8	250.00		Financial - Tax Issues
ungmi Yoo	Assemble the final version of Form 1120-S (0.2) and email EC for signature (0.1).	9/11/2025	0.3	250.00		Financial - Tax Issues
off Winkler	Call with counsel and RLD to discuss ARC, Fillmore, next steps.	9/11/2025	0.6	340.00		Legal - Asset Analysis and Recovery
na Priebe	Email KH and GBW re: promoter and employee addresses for service.	9/11/2025	0.0	215.00		Legal - Case Administration
na Priebe	Research service addresses for employees and promoters.	9/11/2025	0.1	215.00		Legal - Case Administration
off Winkler	Review draft settlement agreement, discuss with counsel KH.	9/11/2025	0.3	340.00		Legal - Case Administration
ungmi Yoo	Prepare supplemental forms and schedules for Form 1120-SF.	9/12/2025	0.8	250.00		Financial - Data Analysis
ra Bond	Discussions with SMY re: e-filing and assembling tax returns.	9/12/2025	0.4	255.00		Financial - Tax Issues
ila Bolla	Continue with review and coordination of 2024 PCWS tax workpapers and tax return; review	0/12/2020	0.4	200.00	102.00	Titational Tax loodes
een Castle	updated tax returns; updates to disclosure statement and return package for mailing.	9/12/2025	1.3	395.00	513.50	Financial - Tax Issues
ungmi Yoo	Revise the 2024 Form 1120-S based on EC's comments.	9/12/2025	0.5	250.00	125.00	Financial - Tax Issues
ungmi Yoo	Review Disclosure Statement A to support the 2024 QSF tax return.	9/12/2025	0.3	250.00	75.00	Financial - Tax Issues
ungmi Yoo	Draft and review prompt determination letter to attach to the 2024 QSF tax return.	9/12/2025	0.3	250.00	75.00	Financial - Tax Issues
ungmi Yoo	Review tax treatments of various settlement income.	9/12/2025	0.4	250.00	100.00	Financial - Tax Issues
ungmi Yoo	Compare the 2024 QSF return with the S-corp return and review transferred assets.	9/12/2025	0.4	250.00	100.00	Financial - Tax Issues
ungmi Yoo	Assess paid preparer qualifications under applicable IRS regulations.	9/12/2025	0.7	250.00	175.00	Financial - Tax Issues
ungmi Yoo	Review the e-file process for Form 1120-S.	9/12/2025	0.2	250.00	50.00	Financial - Tax Issues
ungmi Yoo	Complete and review the 2024 Form 1120-SF for the QSF.	9/12/2025	1.6	250.00	400.00	Financial - Tax Issues
ungmi Yoo	Review 2024 tax workpapers for Form 1120-SF.	9/12/2025	0.8	250.00	200.00	Financial - Tax Issues
ungmi Yoo	Analyze taxable gain from property sale and prepare Form 4797 for QSF.	9/12/2025	0.7	250.00	175.00	Financial - Tax Issues
ungmi Yoo	Prepare 2024 Form 8275 for QSF.	9/12/2025	0.2	250.00	50.00	Financial - Tax Issues
ungmi Yoo	Discuss EC regarding the filing method for the 2024 Form 1120-S.	9/12/2025	0.4	250.00	100.00	Financial - Tax Issues
na Priebe	Email Stretto re: claimant data.	9/12/2025	0.1	215.00		Legal - Case Administration
een Castle	Prepare notes to SY on updates to 2024 PCWS and PC QSF.	9/13/2025	0.5	395.00	197.50	Financial - Tax Issues
ra Bond	Discussion with SMY and EC regarding the status of tax returns.	9/15/2025	0.1	255.00	25.50	Financial - Tax Issues
een Castle	Meet with tax group for status report on tax return preparation.	9/15/2025	0.7	395.00	276.50	Financial - Tax Issues
eungmi Yoo	Discussion with EC re: review comments on Form 1120-SF and efile.	9/15/2025	0.4	250.00	100.00	Financial - Tax Issues
ungmi Yoo	Discussion with SMB and EC regarding the status of tax returns.	9/15/2025	0.1	250.00	25.00	Financial - Tax Issues
ra Bond	Processing August METB statement.	9/15/2025	0.1	255.00	25.50	Legal - Case Administration
eoff Winkler	Call with counsel KH to discuss conversations with clawback parties.	9/16/2025	0.9	340.00	306.00	Legal - Case Administration
off Winkler	Status check in DH litigation.	9/17/2025	0.2	340.00	68.00	Financial - Litigation Consulting
een Castle	Review final tax return package for PCWS and PCQSF; final updates and ready for receiver.	9/17/2025	0.6	395.00	237.00	Financial - Tax Issues
na Priebe	Emails with LR and Stretto team re: claimant data transfer.	9/17/2025	0.2	215.00	43.00	Legal - Case Administration
eoff Winkler	Process and verify four wires, check for A/P.	9/18/2025	0.3	340.00	102.00	Financial - Accounting/Auditing
off Winkler	Call with litigation counsel to discuss settlement payment.	9/18/2025	0.3	340.00	102.00	Financial - Litigation Consulting
na Priebe	Call with GBW re: hardship claimant check in.	9/18/2025	0.1	215.00	21.50	Legal - Case Administration
eoff Winkler	Call with AMP re: hardship claimant check in.	9/18/2025	0.1	340.00	34 00	Legal - Case Administration

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
eungmi Yoo	Review the amount transferred from the entity to the QSF for reporting on the tax return.	9/19/2025	0.3	250.00	75.00	Financial - Tax Issues
eungmi Yoo	Print the updated tax return (0.1) and email EC for review (0.1).	9/19/2025	0.2	250.00	50.00	Financial - Tax Issues
eungmi Yoo	Update 2024 Form 1120-SF based on EC's comments.	9/19/2025	0.6	250.00	150.00	Financial - Tax Issues
eungmi Yoo	Update Form 4797 to reflect the abandonment of assets.	9/19/2025	0.3	250.00	75.00	Financial - Tax Issues
eungmi Yoo	Draft Form 8275 for the disclosure statement.	9/19/2025	0.3	250.00	75.00	Financial - Tax Issues
nna Priebe	Email KH and KA re: objection deadline.	9/19/2025	0.1	215.00	21.50	Legal - Case Administration
nna Priebe	Emails with KH and JLH re: deposits from settlement. Meeting with GBW, JLH, RLD, and GJM regarding asset recovery and upcoming report,	9/19/2025	0.2	215.00	43.00	Legal - Case Administration
nna Priebe	reconciliation of bank statements. Meeting with AMP, JLH, RLD, and GJM regarding asset recovery and upcoming report,	9/22/2025	0.2	215.00		Legal - Case Administration
eoff Winkler	reconciliation of bank statements.	9/22/2025	0.2	340.00		Legal - Case Administration
eoff Winkler	Review email from litigation counsel, review banking, email to litigation counsel.	9/24/2025	0.2	340.00		Financial - Litigation Consulting
eoff Winkler	Call with third party re BK arrest.	9/25/2025	0.3	340.00		Legal - Case Administration
eoff Winkler	Review draft response to motion to dismiss, provide comments to counsel KH.	9/26/2025	0.4	340.00		Financial - Litigation Consulting
nna Priebe	Reviewing hardship claim application.	9/26/2025	0.9	215.00		Legal - Asset Analysis and Recovery
eoff Winkler	Process deposit for third party litigation.	9/29/2025	0.1	340.00		Financial - Accounting/Auditing
eoff Winkler	Prepare for upcoming mediation. Review Expert 1 and Expert 2 opinion docs from GBW and discussion with GBW and counsel re:	9/29/2025	1.5	340.00		Financial - Litigation Consulting
ohn Hall	same.	9/29/2025	0.6	310.00		Financial - Litigation Consulting
ına Priebe	Call with SMB re: hardship claim analysis.	9/29/2025	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
na Priebe	Email hardship claimant re: analysis.	9/29/2025	0.1	215.00		Legal - Asset Analysis and Recovery
na Priebe	Email GBW re: expert memos for recovery.	9/29/2025	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
eoff Winkler	Email AMP re: expert memos for recovery.	9/29/2025	0.1	340.00	34.00	Legal - Asset Analysis and Recovery
na Priebe	Meeting with RLD, GBW, JLH, and GJM regarding asset recovery and litigation.	9/29/2025	0.1	215.00	21.50	Legal - Case Administration
na Priebe	Email JP re: wire not received.	9/29/2025	0.1	215.00	21.50	Legal - Case Administration
na Priebe	Emails with two investors re: change of address and updates on distribution.	9/29/2025	0.2	215.00	43.00	Legal - Case Administration
eoff Winkler	Meeting with RLD, AMP, JLH, and GJM regarding asset recovery and litigation.	9/29/2025	0.1	340.00	34.00	Legal - Case Administration
eoff Winkler	Review documents in preparation for mediation.	9/30/2025	2.2	340.00	748.00	Financial - Litigation Consulting
eoff Winkler	Review response to motion to dismiss re Voydat.	9/30/2025	0.3	340.00	102.00	Financial - Litigation Consulting
eoff Winkler	Review updated response to motion to dismiss (Bruerd) and email counsel KH.	9/30/2025	0.2	340.00	68.00	Financial - Litigation Consulting
nna Priebe	Email hardship claimant re: accounting.	9/30/2025	0.1	215.00	21.50	Legal - Asset Analysis and Recovery
nna Priebe	Calls with SMB to review accounting for hardship claim.	9/30/2025	0.6	215.00	129.00	Legal - Asset Analysis and Recovery
nna Priebe	Reviewing vehicle information for hardship claimant.	9/30/2025	0.5	215.00	107.50	Legal - Asset Analysis and Recovery
eoff Winkler	Call with RLD and counsel KE re Fillmore.	9/30/2025	0.3	340.00	102.00	Legal - Asset Analysis and Recovery
nna Priebe	Prepare outline of status report.	9/30/2025	0.3	215.00	64.50	Legal - Case Administration
nna Priebe	Email KA and KH re: settlement exclusions.	9/30/2025	0.1	215.00		Legal - Case Administration
		Totals	147.9		42,921.00	- - =
	Summary by Activity Category and Personnel					1
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	Summary by Activity Category and Personnel				
Financial - Accounting/Auditing	Personnel	Firm	Hours	Rate	Amount
Financial - Accounting/Auditing	Anna Priebe	AFS	0.0	215.00	-
Financial - Accounting/Auditing	Eileen Castle	AFS	0.0	395.00	-
Financial - Accounting/Auditing	Geoff Winkler	AFS	1.3	340.00	442.00
Financial - Accounting/Auditing	Jen Hardy	AFS	0.0	200.00	-
Financial - Accounting/Auditing	John Hall	AFS	0.0	310.00	-
Financial - Accounting/Auditing	Renee Dieffenderfer	AFS	0.0	255.00	-
Financial - Accounting/Auditing	Sara Bond	AFS	0.0	255.00	-
Financial - Accounting/Auditing	Seungmi Yoo	AFS	0.0	250.00	-
		· =	1.3		442.00
	Processed.				
Financial - Data Analysis	Personnel	Firm	Hours	Rate	Amount
Financial - Data Analysis	Anna Priebe	AFS	0.0	215.00	-
Financial - Data Analysis	Eileen Castle	AFS	0.0	395.00	-

Attachment 1

SEC v. Profit Connect Wealth Services, Inc. et al. Summary of Fees of Receiver and Retained Personnel July 1, 2025 - September 30, 2025 (Sorted in Chronological Order by Activity Category)

Personnel Item / Description Rate **Activity Category** Date Hours Amount Financial - Data Analysis Geoff Winkler AFS 0.0 340.00 Jen Hardy Financial - Data Analysis AFS 0.0 200.00 John Hall AFS Financial - Data Analysis 0.0 310.00 Financial - Data Analysis Renee Dieffenderfer AFS 0.0 255.00 Sara Bond Financial - Data Analysis AFS 0.0 255.00 Financial - Data Analysis Seungmi Yoo AFS 0.8 250.00 200.00 0.8 200.00 Financial - Litigation Consulting Personnel Firm Hours Rate Amount Financial - Litigation Consulting Anna Priebe AFS 0.0 215.00 Eileen Castle Financial - Litigation Consulting AFS 0.0 395.00 Geoff Winkler Financial - Litigation Consulting AFS 24.3 340.00 8,262.00 Financial - Litigation Consulting Jen Hardy AFS 200.00 0.0 Financial - Litigation Consulting John Hall AFS 2.4 310.00 744.00 Renee Dieffenderfer Financial - Litigation Consulting AFS 0.0 255.00 Sara Bond Financial - Litigation Consulting AFS 0.0 255.00 Financial - Litigation Consulting Seungmi Yoo AFS 0.0 250.00 26.7 9,006.00 Financial - Status Reports Personnel Firm Hours Rate Amount Anna Priebe Financial - Status Reports AFS 0.0 215.00 Financial - Status Reports Fileen Castle AFS 0.0 395.00 Geoff Winkler Financial - Status Reports AFS 0.1 340.00 34.00 Financial - Status Reports Jen Hardy AFS 200.00 0.0 John Hall Financial - Status Reports AFS 0.0 310.00 Financial - Status Reports Renee Dieffenderfer AFS 0.4 255.00 102.00 Financial - Status Reports Sara Bond AFS 0.0 255.00 Seungmi Yoo Financial - Status Reports AFS 0.0 250.00 136.00 0.5 Personnel Financial - Tax Issues Firm Hours Rate Amount Anna Priebe Financial - Tax Issues AFS 1.0 215.00 215.00 Eileen Castle AFS Financial - Tax Issues 17.8 395.00 7,031.00 Geoff Winkler Financial - Tax Issues AFS 1.4 340.00 476.00 Financial - Tax Issues Jen Hardy AFS 0.0 200.00 Financial - Tax Issues John Hall AFS 310.00 341.00 1.1 Financial - Tax Issues Renee Dieffenderfer AFS 0.9 255.00 229.50 Sara Bond Financial - Tax Issues AFS 2.0 255.00 510.00 Seungmi Yoo Financial - Tax Issues AFS 34.8 250.00 8,700.00 59.0 17.502.50 Legal - Asset Analysis and Recovery Personnel Firm Hours Rate Amount Anna Priebe Legal - Asset Analysis and Recovery AFS 9.2 215.00 1,978.00 Legal - Asset Analysis and Recovery Eileen Castle AFS 395.00 0.0 Legal - Asset Analysis and Recovery Geoff Winkler AFS 340.00 2.074.00 6.1 Legal - Asset Analysis and Recovery Jen Hardy AFS 200.00 0.0 Legal - Asset Analysis and Recovery John Hall AFS 0.0 310.00 Legal - Asset Analysis and Recovery Renee Dieffenderfer AFS 0.0 255.00 Sara Bond Legal - Asset Analysis and Recovery AFS 0.0 255.00 Legal - Asset Analysis and Recovery Seungmi Yoo AFS 250.00 0.0 15.3 4,052.00

Personnel

Anna Priebe

Eileen Castle

Geoff Winkler

Renee Dieffenderfer

Jen Hardy

John Hall

Sara Bond

Seungmi Yoo

TOTAL FEES

Personnel

Legal - Case Administration

Date Hours Rate Amount **Activity Category** Firm Hours Rate Amount AFS 22.1 215.00 4,751.50 AFS 395.00 0.0 AFS 14.3 340.00 4,862.00 AFS 1.8 200.00 360.00 AFS 1.0 310.00 310.00 AFS 3.6 255.00 918.00 AFS 1.2 255.00 306.00 AFS 0.3 250.00 75.00 44.3 11,582.50

147.9

42,921.00

Attachment 1

Legal - Claims Administration and					
Objections	Personnel	Firm	Hours	Rate	Amount
Legal - Claims Administration and Objections	Anna Priebe	AFS	0.0	215.00	-
Legal - Claims Administration and Objections	Eileen Castle	AFS	0.0	395.00	-
Legal - Claims Administration and Objections	Geoff Winkler	AFS	0.0	340.00	-
Legal - Claims Administration and Objections	Jen Hardy	AFS	0.0	200.00	-
Legal - Claims Administration and Objections	John Hall	AFS	0.0	310.00	-
Legal - Claims Administration and Objections	Renee Dieffenderfer	AFS	0.0	255.00	-
Legal - Claims Administration and Objections	Sara Bond	AFS	0.0	255.00	-
Legal - Claims Administration and Objections	Seungmi Yoo	AFS	0.0	250.00	-
			0.0		-

Item / Description

Overall Summary					
Totals	Personnel	Firm	Hours	Rate	Amount
	Anna Priebe	AFS	32.3	215.00	6,944.50
	Eileen Castle	AFS	17.8	395.00	7,031.00
	Geoff Winkler	AFS	47.5	340.00	16,150.00
	Jen Hardy	AFS	1.8	200.00	360.00
	John Hall	AFS	4.5	310.00	1,395.00
	Renee Dieffenderfer	AFS	4.9	255.00	1,249.50
	Sara Bond	AFS	3.2	255.00	816.00
	Seungmi Yoo	AFS	35.9	250.00	8,975.00
		_	147.9		42,921.00
		-			

SEC v. Profit Connect Wealth Services, Inc. et al. Summary of Expenses of Receiver and Retained Personnel July 1, 2025 - September 30, 2025

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Sara Bond	Extra Space Storage	Storage rent prorations	7/10/2025		Document and Asset Storage
Geoff Winkler	American Fiduciary Services	Per Diem Meals	7/9/2025	•	Per Diem Meals
Geoff Winkler	Alaska Air	Alaska Air - Airfare	7/1/2025	•	Airfare
Geoff Winkler	Port of Portland	Port of Portland - Parking - Automotive Expense	7/9/2025	•	Automotive Expense
Geoff Winkler	Lyft	Lyft - Taxi - Automotive Expense	7/9/2025	·	•
Geoff Winkler	Lyft	Lyft - Taxi - Automotive Expense	7/10/2025	\$ 27.26	•
Geoff Winkler	American Airlines	American Airlines - Airfare - Sutton Trial	7/10/2025	\$ 1,378.37	Airfare
Sara Bond	Extra Space Storage	Storage rent prorations	8/10/2025	\$ 121.00	Document and Asset Storage
Geoff Winkler	GoDaddy	GoDaddy - Website Renewal - Internet/Online Fees	8/11/2025	\$ 191.76	Internet/Online Fees
Geoff Winkler	GoDaddy	GoDaddy - Domain Renewal - Internet/Online Fees	8/11/2025	\$ 44.38	Internet/Online Fees
Geoff Winkler	GoDaddy	GoDaddy - Website Renewal - Internet/Online Fees	8/14/2025	\$ 359.88	Internet/Online Fees
Geoff Winkler	PACER	PACER Access	9/3/2025	\$ 2.80	Miscellaneous
Geoff Winkler	PACER	PACER Access	9/5/2025	\$ 4.50	Miscellaneous
Sara Bond	TLO	Internet/Online Fees	8/1/2025	\$ 183.22	Internet/Online Fees
Sara Bond	Extra Space Storage	Storage rent prorations	9/10/2025	\$ 121.00	Document and Asset Storage
Eileen Castle	FedEx Office	Printing/Photocopying/Stationery	9/12/2025	\$ 15.01	Printing/Photocopying/Stationery
Geoff Winkler	GoDaddy	GoDaddy - Internet/Online Fees	9/15/2025	\$ 22.19	Internet/Online Fees
			Total	3,501.51	-

	Geoff Winkler	Eileen Castle	Sara Bond	Total
Airfare	2,154.97	-	-	2,154.97
Automotive Expense	95.30	-	-	95.30
Courier/Shipping/Freight	-	-	-	-
Document and Asset Storage	-	-	363.00	363.00
Hotel	-	-	-	-
Per Diem Meals	64.50	-	-	64.50
Internet/Online Fees	618.21	-	183.22	801.43
Miscellaneous	7.30	-	-	7.30
Office Supplies	-	-	-	-
Personal Car Mileage	-	-	-	-
Printing/Photocopying/Stationery	-	15.01	-	15.01
Total	2,940.28	15.01	546.22	3,501.51

SEC v. Profit Connect Wealth Services, Inc. et al. **Receivership Estate Balance Sheet** July 1, 2025 - September 30, 2025

Assets:		Liabilities:	
Cash	\$ 2,253,302	State/Federal Taxes ⁴	\$ -
Loan Receivable	\$ -	Property Taxes ⁴	\$ -
Marketable Securities	\$ -	Admin Holdback ¹	\$ 480,340
Real Property ¹	\$ -	Total Liabilities	\$ 480,340
Personal Property ¹	\$ -		
Private Equity Investments ¹	\$ -	Claims:1	
Existing Litigation ^{2,3}	\$ -	Investors ⁵	\$ 21,998,010
Third Party Litigation ^{2,3}	\$ 2,206,710	Creditors ⁵	\$ 4,999
Professional Liability Litigation ^{2,3}	\$ 1,000,000	Interim Distribution ⁶	\$ (7,875,653)
		Total Remaining Claims	\$ 14,127,355
Total Assets	\$ 5,460,012	Total Liabilities plus Claims	\$ 14,607,695

^{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 reserved and approved by the Court.

^{6.} The first interim distribution was approved for \$8,000,000 to be distributed to investors. \$124,346.64 of the \$8,000,000 was reserved due to investors missing identification numbers or to allow the Receiver to complete litigation items with agents who had claims.

SEC v. Profit Connect Wealth Services, Inc. et al.

Receiver's Cash Receipts and Disbursements

July 1, 2025 - September 30, 2025

Beginning Balance of Cash in Receivership Estate on July 1, 2025

Deposits:

\$ 2,330,049.85

\$ 3,800.04

Payments:

\$ (80,547.85)

Ending Balance of Cash in Receivership Estate on September 30, 2025

\$ 2,253,302.04

EXHIBIT 2

EXHIBIT 2

DECLARATION OF KARA B. HENDRICKS

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1	KARA B. HENDRICKS, ESQ.
	Nevada Bar No. 07743
2	KYLE A. EWING, ESQ.
	Nevada Bar No. 14051
3	GREENBERG TRAURIG, LLP
	10845 Griffith Peak Drive, Suite 600
4	Las Vegas, Nevada 89135
	Telephone: (702) 792-3773
5	Facsimile: (702) 792-9002
	Email: hendricksk@gtlaw.com
6	ewingk@gtlaw.com
_	WYDAE ANDDACCY ECO *
7	KYRA E. ANDRASSY, ESQ.* *Admitted Pro Hac Vice
0	RAINES FELDMAN LITTRELL LLP
8	4675 MacArthur Court, Suite 1550
0	Newport Beach, CA 92660
9	Telephone: (310) 440-4100
10	Facsimile: (949) 247-3998
10	Email: kandrassy@raineslaw.com
11	Emain: Ranarassy (coramosia w. com
11	Attorneys for Receiver,
12	Geoff Winkler of American Fiduciary Services
14	

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

	Plaintiff,
v.	
PROFIT CONNECT WE INC., JOY I. KOVAR, as KOVAR,	· · ·

SECURITIES AND EXCHANGE

COMMISSION,

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

DECLARATION OF KARA B.
HENDRICKS IN SUPPORT OF THE
SEVENTEENTH APPLICATION FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS OF THE
RECEIVER AND HIS
PROFESSIONALS FOR THE PERIOD
FROM JULY 1, 2025, THROUGH
SEPTEMBER 30, 2025

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

Defendants

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

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Allowance and Payment of Fees and Costs of the Receiver and His Professionals for the Period from July 1, 2025, Through September 30, 2025 ("Seventeenth Application"), in connection with Profit Connect Wealth Services, Inc. This declaration is based on my personal knowledge, except where made on information and belief, and as to those matters, I believe them to be true.

- 3. GT was retained by the Receiver in June 2022. The Receiver selected Greenberg Traurig as one of two firms serving as general receivership counsel due to the firm's litigation experience, receivership experience, and strong Nevada base.
- 4. Attached to this declaration are a true and correct copy of the invoices for the services of my firm for the period from July 1, 2025, through September 30, 2025 (the "Application Period"). The first group of invoices, bearing file number 209375.010200, relate to the main receivership action. The second group of invoices, bearing file number 209375.010900, relate to the litigation action against former employees and promoters of Profit Connect.
- 5. In the ordinary course of Greenberg Traurig's business, we keep a record of all time expended by our professionals in the rendering of professional services on a computerized billing system.
- At or near the time the professional services are rendered, professionals of the firm 6. record (a) the description of the nature of the services performed, (b) the duration of the time expended, and (c) the client/matter name or number by either: (1) writing such information on a time sheet, or (2) inputting such information directly into the firm's computer billing system.
- 7. For the professionals who record their time using written time sheets, the information contained in the time sheets is transcribed into the firm's computer billing system.
- 8. The firm's computer billing system keeps a record of all time spent on a client/matter, the professional providing the services, and a description of the services rendered. The firm's computer billing system automatically multiplies the time expended by each professional by the respective professional's billing rate to calculate the amount of the fee. The firm conducts its business in reliance on the accuracy of such business records. The billing system

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generates invoices, like those attached here. For the invoices attached here, I confirm that I have reviewed and edited, as appropriate, each of them.

- 9. As reflected in the attached invoices for matter 209375.010200, pursuant to the Receivership Order (ECF No. 26) and the Order Authorizing Employment of Counsel (ECF No. 46), professionals at Greenberg Traurig assisted the Receiver as follows during the Application Period: preparation and filing of the necessary quarterly status report; working with outside counsel on third party litigation matters, including interfacing with counsel in Texas proceeding to file a motion to approve a settlement with Jeffrey Nicholas; interfacing with counsel in Nevada malpractice proceeding; negotiations with former promoters and employees of Profit Connect and interfacing with promoters and employees of Profit Connect in an effort to avoid litigation and pre-litigation efforts.
- 10. As reflected in the attached invoices for matter 209375.010900, pursuant to the Receivership Order (ECF No. 26) and the Order Granting Motion for Order in Aid of Receivership to Pursue Clawback Actions Against Former Promoters and Employees of Profit Connect (ECF No. 249) ("Clawback Action"), professionals at Greenberg Traurig assisted in Receiver in pursuing the Clawback Action by serving the complaint; communicating and attempting to resolve claims with defendants after service; preparing documents to obtain court approval of settlement amounts with certain defendants; and responding to motions to dismiss filed by certain defendants.
- 11. GT endeavored to staff each task efficiently, using a core team of attorneys and utilizing associates and paralegal assistance where appropriate. Additionally, Greenberg Traurig agreed to discount its standard billing rates for this matter by 15%.
- 12. I hereby certify that I have read the Receiver's Seventeenth Application to which this declaration will be attached.
- 13. To the best of my knowledge, information and belief formed after reasonable inquiry, the Sixteenth Application and all fees and expenses therein are true and accurate and comply with the Billing Instructions for Receivers in Civil Actions commenced by the U.S. Securities and Exchange Commission.

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

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

Executed on this 3rd day of December 2025.

/s/ Kara B. Hendricks KARA B. HENDRICKS

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Declarant

EXHIBIT A

EXHIBIT A

GREENBERG TRAURIG INVOICES

Invoice No.: 1001105870 File No. : 209375.010200 Bill Date : August 14, 2025

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

INVOICE

Re: Profit Connect Receivership

Legal Services through July 31, 2025:

Total Fees: \$ 3,828.80

Current Invoice: \$ 3,828.80

Previous Balance (see attached statement): \$ 42,642.02

Total Amount Due: \$ 46,470.82

KBH:LC

Invoice No.: 1001105870 File No. : 209375.010200

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

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF FILE NUMBER: 209375.010200 **INVOICE NUMBER:** 1001105870* **BILLING PROFESSIONAL: Kara B. Hendricks**

> Current Invoice: \$ 3,828.80

Previous Balance: 42,642.02 46,470.82 Total Amount Due:

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK

ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK

ABA# 063107513

CREDIT TO: **GREENBERG TRAURIG**

ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF

> **FILE NUMBER:** 209375.010200 **INVOICE NUMBER:** 1001105870*

BILLING

PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig

KBH:LC

Invoice No.: 1001105870 File No. : 209375.010200

PO Box 936769 ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

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

KBH:LC

Invoice No.: 1001105870 File No. : 209375.010200

Account Statement

Date Date	Invoice #	Fees Due	Expenses Due	Other Due	Total Due
08/16/22	1000055915	1,830.36	0.00	0.00	1,830.36
08/16/22	1000033913	750.00	0.00	0.00	750.00
10/10/22	1000071911	653.47	0.00	0.00	653.47
10/10/22	1000106239	649.94	0.00	0.00	649.94
12/09/22	1000142692	827.05		0.00	827.05
01/09/23	1000100290	410.90	0.00	0.00	410.90
			0.00		
03/08/23	1000246231	408.98	0.00	0.00	408.98
05/03/23	1000298043	1,154.13	0.00	0.00	1,154.13
05/03/23	1000298376	844.60	0.00	0.00	844.60
05/05/23	1000303926	393.78	0.00	0.00	393.78
06/08/23	1000340021	1,378.75	0.00	0.00	1,378.75
07/10/23	1000357968	525.42	0.00	0.00	525.42
08/24/23	1000397017	1,093.54	0.00	0.00	1,093.54
09/14/23	1000417401	138.87	0.00	0.00	138.87
10/16/23	1000453412	410.41	0.00	0.00	410.41
12/08/23	1000519190	1,361.30	0.00	0.00	1,361.30
01/16/24	1000537004	216.60	0.00	0.00	216.60
02/12/24	1000568047	779.07	0.00	0.00	779.07
03/15/24	1000596622	66.69	0.00	0.00	66.69
05/20/24	1000665701	1,201.74	0.00	0.00	1,201.74
06/11/24	1000684471	943.71	0.00	0.00	943.71
07/08/24	1000709024	2,149.60	0.00	0.00	2,149.60
09/18/24	1000776080	681.71	0.00	0.00	681.71
10/07/24	1000798712	1,907.14	0.00	0.00	1,907.14
10/16/24	1000812870	1,581.04	0.00	0.00	1,581.04
11/06/24	1000834982	1,676.05	0.00	0.00	1,676.05
12/13/24	1000866536	1,113.05	0.00	0.00	1,113.05
01/15/25	1000896036	1,585.19	0.00	0.00	1,585.19
04/28/25	1000999077	903.62	0.00	0.00	903.62
04/28/25	1000999080	296.02	0.00	0.00	296.02
04/28/25	1000999081	560.86	0.00	0.00	560.86
05/06/25	1001012395	1,493.25	0.00	0.00	1,493.25
06/09/25	1001048181	6,193.68	0.00	0.00	6,193.68
07/24/25	1001089510	6,461.50	0.00	0.00	6,461.50
	Totals:	\$ 42,642.02	\$ 0.00	\$ 0.00	\$ 42,642.02

KBH:LC

<u>Description of Professional Services Rendered:</u>

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/25	Kara B. Hendricks	Follow-up with S. Morrill regarding letters to promoter targets;	0.30	144.08
07/02/25	Kara B. Hendricks	Review emails regarding Hayes deposition and respond to same;	0.20	96.05
07/03/25	Kara B. Hendricks	Review emails regarding TX trial with Nicholas and telephone call with G. Winkler regarding same; Propose options for G. Winkler testimony due to conflicts; Review emails regarding service of notice for BofA claims;	0.80	384.20
07/09/25	Kara B. Hendricks	Review and respond to emails regarding TX trial and potential settlement;	0.20	96.05
07/10/25	Kara B. Hendricks	Review emails and correspond with G. Winkler and J. Paul Manning regarding proposed Nicholas settlement and case timing;	0.20	96.05
07/15/25	Kara B. Hendricks	Follow-up with J. Moore regarding Nicholas settlement; Confer with M. Coles regarding motion to approve Nicholas settlement and provide relevant emails and prior motion relating to Sutton;	0.50	240.13
07/16/25	Kara B. Hendricks	Review draft Nicholas settlement and judgment and correspond with TX team; Follow-up with G. Winkler regarding draft pyrometer complaint;	0.20	96.05
07/18/25	Kara B. Hendricks	Discuss motion to approve Nicholas settlement with M. Coles and provide draft agreement(.2); Update complaint and motion based on comments from A. Eklund and G. Winkler and provide to SEC for comment (.4);	0.60	288.13
07/22/25	Kara B. Hendricks	Review Hayes offer of judgment and correspond with G. Winkler regarding same (.1); Follow-up with K. Wanner regarding promoter motion and complaint and prepare proposed order (.3);	0.40	192.10
07/23/25	Madeleine Coles	Draft motion to approve settlement with J. Nicholas	1.00	340.00
07/23/25	Kara B. Hendricks	Telephone call with G. Winkler regarding motion to pursue employee and promoter claims; Work with E. Escobar-Gaddi to file same;	0.30	144.08
07/24/25	Steph Morrill	Discussion with K.Hendricks regarding drafting letters to promoters and employers and attaching motion for aid in order to pressure response and resolution;	0.10	17.50
07/25/25	Steph Morrill	Revise promoter/employer tracker to	1.20	210.00

		prepare for litigation and in anticipation of drafting letters to potential Complaint defendants (.8); Draft shell letter to promoters and employers which will attach the motion for aid to seek litigation against same, and circulate to K.Hendricks for review (.4);		
07/28/25	Kara B. Hendricks	Review demand letter to promoters and correspond with S. Morrill about finalizing and sending to interested parties;	0.20	96.05
07/28/25	Steph Morrill	Update and finalize letters to promoters and employees and prepare draft per each potential defendant, reviewing correspondence for determination if represented by counsel or not, and appropriately addressing same (1.8); Prepare mailing instructions for copy centre and send with list of names and addresses (.3); Provide draft letters to E.Escobar-Gaddi for finalizing with K.Hendricks signature and providing to copy centre for assembly into envelopes (.1);	2.20	385.00
07/29/25	Kara B. Hendricks	Correspond with S. Morrill regarding letters to promoters regarding pending lawsuit;	0.20	96.05
07/29/25	Steph Morrill	Updates to matter chart reflecting correspondence sent to potential defendants in ancillary matter, and scheduling of depositions in ancillary Hayes matter;	0.30	52.50
07/30/25	Kara B. Hendricks	Review email with R. Paddock regarding Nicholas settlement;	0.10	48.03

Total Hours: 9.00

Total Amount: \$ 3,022.05

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	7	Total \$ Amount
Kara B. Hendricks		4.20	565.00		2,373.00
Madeleine Coles		1.00	400.00		400.00
Steph Morrill		3.80	175.00		665.00
	Totals:	9.00		\$	3,438.00

Summary of Fees (Discounted Rates)

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 13 of 58

Timekeeper Name	Hours Billed	Average Discounted Rate	Τ	Cotal \$ Amount
Kara B. Hendricks	4.20	480.25		2,017.05
Madeleine Coles	1.00	340.00		340.00
Steph Morrill	3.80	175.00		665.00
Totals:	9.00		\$	3,022.05

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/25	Kyle Ewing	Bi-weekly GT team meeting to discuss ongoing projects and next steps, including results of last week's hearing and settlement notice process associated with motion to approve; next steps in Hayes litigation, and strategy/next steps associated with motion for approval to file promoter/employee litigation	0.20	68.00
07/01/25	Steph Morrill	Discussion with K.Hendricks, K.Ewing, and M.Coles related to draft complaint against promoters and employees of PC;	0.20	35.00
07/15/25	Madeleine Coles	Discussion with K.Hendricks, K.Ewing, and S.Morrill regarding draft complaint related to promoters and employees, and next steps after filing same	0.20	68.00
07/15/25	Kyle Ewing	Biweekly meeting with GT team to discuss new projects and ongoing tasks, including recent settlement of third party action and motion authorizing final third party recovery efforts; the Hayes litigation and latest developments, and other outstanding items	0.20	68.00
07/15/25	Steph Morrill	Updates to matter chart related to Dale Hayes litigation; Discussion with K.Hendricks, K.Ewing, and M.Coles regarding draft complaint related to promoters and employees, and next steps after filing same;	0.40	70.00
07/23/25	Steph Morrill	Updates to matter chart related to offer of judgment deadlines for Dale Hayes/ All Defendants;	0.10	17.50
		Total Hours	1.30	

Total Hours: 1.30

Total Amount: \$ 326.50

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	T	otal \$ Amount
Kyle Ewing		0.40	400.00		160.00
Madeleine Coles		0.20	400.00		80.00
Steph Morrill	_	0.70	175.00		122.50
	Totals:	1.30		\$	362.50

Summary of Fees (Discounted Rates)

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 15 of 58

Timekeeper Name	Hours Billed	Average Discounted Rate	T	otal \$ Amount
Kyle Ewing	0.40	340.00		136.00
Madeleine Coles	0.20	340.00		68.00
Steph Morrill	0.70	175.00		122.50
Totals:	1.30	_	\$	326.50

TASK CODE: GW011 STATUS REPORTS

DATE	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/30/25	Kara B. Hendricks	Prepare litigation summary for status report and correspond with A. Eklund and K. Andrassy regarding same;	0.60	288.15
07/31/25	Kara B. Hendricks	Review and provide comments regarding draft status report and correspond with A. Eklund regarding the same;	0.40	192.10
		Total Hours:	1.00	

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Total Amount: \$480.25

TIMEKEEPER SUMMARY FOR TASK CODE GW011,

STATUS REPORTS

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate		Total \$ Amount
Kara B. Hendricks		1.00	565.00		565.00
	Totals:	1.00		\$	565.00
Summary of Fees	(Discounted	Rates)			
Timekeeper Name		Hours Billed	Average Discounted Rate	Total \$ Amount	
Kara B. Hendricks		1.00	480.25		480.25
	Totals:	1.00		\$	480.25

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Summary of Fees (Base Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kyle Ewing		0.40	400.00	160.00
Kara B. Hendricks		5.20	565.00	2,938.00
Madeleine Coles		1.20	400.00	480.00
Steph Morrill		4.50	175.00	787.50
	Totals:	11.30		\$ 4,365.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kyle Ewing		0.40	340.00	136.00
Kara B. Hendricks		5.20	480.25	2,497.30
Madeleine Coles		1.20	340.00	408.00
Steph Morrill		4.50	175.00	787.50
	Totals:	11.30		\$ 3,828.80

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 19 of 58

Invoice No.: 1001105870 Page 9

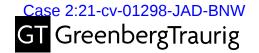
Re: Profit Connect Receivership

Matter No.: 209375.010200

<u>Description of Expenses Billed</u>:

<u>DATE</u> <u>DESCRIPTION</u> <u>AMOUNT</u>

No expenses charged to this file



Invoice No.: 1001137943 File No. : 209375.010200

Bill Date : September 15, 2025

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

INVOICE

Re: Profit Connect Receivership

Legal Services through August 31, 2025:

Total Fees: \$ 2,619.80

Current Invoice: \$ 2,619.80

Previous Balance (see attached statement): \$ 46,470.82

Total Amount Due: \$ 49,090.62

KBH:LC

Invoice No.: 1001137943 File No. : 209375.010200

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

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF FILE NUMBER: 209375.010200 **INVOICE NUMBER:** 1001137943* **BILLING PROFESSIONAL: Kara B. Hendricks**

> Current Invoice: \$ 2,619.80

Previous Balance: 46,470.82

Total Amount Due: 49,090.62

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK

ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK

ABA# 063107513

CREDIT TO: **GREENBERG TRAURIG**

ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF

> **FILE NUMBER:** 209375.010200 **INVOICE NUMBER:** 1001137943*

BILLING

PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig

KBH:LC

Invoice No.: 1001137943 File No. : 209375.010200

PO Box 936769 ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

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

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

KBH:LC

Invoice No.: 1001137943 File No. : 209375.010200

Account Statement

<u>Date</u>	Invoice #	Fees Due	Expenses Due	Other Due	Total Due
08/16/22	1000055915	1,830.36	0.00	0.00	1,830.36
09/13/22	1000071911	750.00	0.00	0.00	750.00
10/10/22	1000106259	653.47	0.00	0.00	653.47
11/09/22	1000142692	649.94	0.00	0.00	649.94
12/09/22	1000166296	827.05	0.00	0.00	827.05
01/09/23	1000193059	410.90	0.00	0.00	410.90
03/08/23	1000246231	408.98	0.00	0.00	408.98
05/03/23	1000298043	1,154.13	0.00	0.00	1,154.13
05/03/23	1000298376	844.60	0.00	0.00	844.60
05/05/23	1000303926	393.78	0.00	0.00	393.78
06/08/23	1000340021	1,378.75	0.00	0.00	1,378.75
07/10/23	1000357968	525.42	0.00	0.00	525.42
08/24/23	1000397017	1,093.54	0.00	0.00	1,093.54
09/14/23	1000417401	138.87	0.00	0.00	138.87
10/16/23	1000453412	410.41	0.00	0.00	410.41
12/08/23	1000519190	1,361.30	0.00	0.00	1,361.30
01/16/24	1000537004	216.60	0.00	0.00	216.60
02/12/24	1000568047	779.07	0.00	0.00	779.07
03/15/24	1000596622	66.69	0.00	0.00	66.69
05/20/24	1000665701	1,201.74	0.00	0.00	1,201.74
06/11/24	1000684471	943.71	0.00	0.00	943.71
07/08/24	1000709024	2,149.60	0.00	0.00	2,149.60
09/18/24	1000776080	681.71	0.00	0.00	681.71
10/07/24	1000798712	1,907.14	0.00	0.00	1,907.14
10/16/24	1000812870	1,581.04	0.00	0.00	1,581.04
11/06/24	1000834982	1,676.05	0.00	0.00	1,676.05
12/13/24	1000866536	1,113.05	0.00	0.00	1,113.05
01/15/25	1000896036	1,585.19	0.00	0.00	1,585.19
04/28/25	1000999077	903.62	0.00	0.00	903.62
04/28/25	1000999080	296.02	0.00	0.00	296.02
04/28/25	1000999081	560.86	0.00	0.00	560.86
05/06/25	1001012395	1,493.25	0.00	0.00	1,493.25
06/09/25	1001048181	6,193.68	0.00	0.00	6,193.68
07/24/25	1001089510	6,461.50	0.00	0.00	6,461.50
08/14/25	1001105870	3,828.80	0.00	0.00	3,828.80
	Totals:	\$ 46,470.82	\$ 0.00	\$ 0.00	\$ 46,470.82

KBH:LC

<u>Description of Professional Services Rendered:</u>

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/04/25	Kara B. Hendricks	Telephone call from B. Fouts regarding letter and judgment; Provide new information to G. Winkler and A. Eklund; Send follow-up email to B. Fouts with hardship application;	0.60	288.15
08/04/25	Kara B. Hendricks	Call from B. Arvanski regarding E. Garrison and update G. Winkler and A. Eklund regarding same;	0.20	96.05
08/06/25	Kara B. Hendricks	Participate in team call with G. Winkler, J. Hall, A. Eklund, K. Andrassy and TX team to discuss status of Nicolas settlement, Hayes litigation and recent activity, third party recovery efforts and next steps;	0.40	192.10
08/07/25	Kara B. Hendricks	Update motion to approve Nicholas settlement and prepare proposed order; Circulate to R. Paddock and team for review and comment;	0.60	288.15
08/08/25	Kara B. Hendricks	Respond to email from G. Winkler regarding Nichols settlement;	0.10	48.03
08/11/25	Kara B. Hendricks	Review and respond to emails from A. Eklund and B. Fouts;	0.20	96.05
08/12/25	Kara B. Hendricks	Review emails from A. Breeden and follow-up regarding potential additional claims for recovery; Update motion to approve Nicholas settlement based on comments received and work with E. Escobar-Gaddi to finalize and file;	0.50	240.10
08/13/25	Kara B. Hendricks	Review order granting motion to pursue promoters and follow-up with G. Winkler regarding timing; Review email from A. Breeden and correspond with G. Winkler regarding settlement posture;	0.30	144.08
08/14/25	Kara B. Hendricks	Call with G. Winkler regarding Hayes litigation and new complaint;	0.30	144.08
08/19/25	Kara B. Hendricks	Respond to email from A. Eklund regarding investor concerns regarding BoA settlement and procedure to object and opt out based on order;	0.40	192.10
08/20/25	Kara B. Hendricks	Correspond with A. Eklund and K. Andrassy regarding case issues; Review emails regarding Hayes mediation;	0.20	96.05
08/20/25	Kara B. Hendricks	Call with A. Eklund regarding B. Fouts hardship application and investor objection to BoA settlement;	0.40	192.10
08/29/25	Kara B. Hendricks	Respond to email from J. Moore regarding hearing on Nicholas settlement; Review minute order granting motion and update J.	0.30	144.08

Moore regarding same;

Total Hours: 4.50

Total Amount: \$ 2,161.12

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	T	otal \$ Amount
Kara B. Hendricks		4.50	565.00		2,542.50
Summary of Fees	Totals: s (Discounted	4.50 Rates)		\$	2,542.50
Timekeeper Name		Hours Billed	Average Discounted Rate	T	Cotal \$ Amount
Kara B. Hendricks		4.50	480.25		2,161.12
	Totals:	4.50		\$	2,161.12

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/25	Steph Morrill	Updates to matter chart with respect to filed status report for Q2 2025;	0.10	17.50
08/04/25	Steph Morrill	Review of notes from K.Hendricks communications to Receiver related to Brian Fouts and Eric Garrison (via counsel) calls related to final demand letters; Updates to promoter/employee tracker related to same:	0.50	87.50
08/21/25	Kara B. Hendricks	Confer with G. Winkler regarding proposed mediation and expert costs in Hayes litigation;	0.20	96.05
08/25/25	Kara B. Hendricks	Review outline for investor meeting and correspond with A. Eklund and K. Andrassy regarding same;	0.20	96.05
08/28/25	Kara B. Hendricks	Attend investor call;	0.30	144.08
08/29/25	Steph Morrill	Updates to matter chart related to Kovar and Wildes depositions;	0.10	17.50

Total Hours: 1.40

Total Amount: \$458.68

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	То	otal \$ Amount
Kara B. Hendricks		0.70	565.00		395.50
Steph Morrill	<u></u>	0.70	175.00		122.50
	Totals:	1.40		\$	518.00
Summary of Fees	(Discounted	Rates)			
Timekeeper Name		Hours Billed	Average	To	otal \$ Amount
-			Discounted Rate		
Kara B. Hendricks		0.70	Discounted Rate 480.26		336.18
Kara B. Hendricks Steph Morrill		0.70 0.70	_		336.18 122.50

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Totals:

Summary of Fees (Base Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kara B. Hendricks		5.20	565.00	2,938.00
Steph Morrill	<u>-</u>	0.70	175.00	 122.50
	Totals:	5.90		\$ 3,060.50
Summary of Fees (Discour	nted Rates)			
<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kara B. Hendricks		5.20	480.25	2,497.30
Steph Morrill	-	0.70	175.00	 122.50

5.90

\$

2,619.80

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 29 of 58

Invoice No.: 1001137943 Page 6

Re: Profit Connect Receivership

Matter No.: 209375.010200

<u>Description of Expenses Billed</u>:

<u>DATE</u> <u>DESCRIPTION</u> <u>AMOUNT</u>

No expenses charged to this file

Invoice No.: 1001156759 File No. : 209375.010200 Bill Date : October 10, 2025

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

INVOICE

Re: Profit Connect Receivership

Legal Services through September 30, 2025:

Total Fees: \$ 532.75

Current Invoice: \$ 532.75

Previous Balance (see attached statement): \$ 37,771.88

Total Amount Due: \$ 38,304.63

KBH:LC

Invoice No.: 1001156759 File No. : 209375.010200

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

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF FILE NUMBER: 209375.010200 INVOICE NUMBER: 1001156759* BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice: \$ 532.75
Previous Balance: \$ 37,771.88
Total Amount Due: \$ 38,304.63

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK

ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK

ABA# 063107513

CREDIT TO: GREENBERG TRAURIG

ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF

FILE NUMBER: 209375.010200 INVOICE NUMBER: 1001156759*

BILLING

PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig PO Box 936769

KBH:LC

Invoice No.: 1001156759 File No. : 209375.010200

ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

 $\boldsymbol{^*}$ If paying more than one invoice, please reference all invoice numbers in wiring instructions.

Please contact <u>acct-cashreceipts@gtlaw.com</u> for any payment related questions.

KBH:LC

Invoice No.: 1001156759 File No. : 209375.010200

Account Statement

Date Date	Invoice #	Fees Due	Expenses Due	Other Due	<u>Total Due</u>
08/16/22	1000055915	1,830.36	0.00	0.00	1,830.36
09/13/22	1000033913	750.00	0.00	0.00	750.00
10/10/22	1000071911	653.47	0.00	0.00	653.47
11/09/22	1000100239	649.94	0.00	0.00	649.94
12/09/22	1000142092	827.05	0.00	0.00	827.05
01/09/23	1000100290	410.90	0.00	0.00	410.90
03/08/23	1000193039	408.98	0.00	0.00	408.98
05/03/23	1000240231	1,154.13	0.00	0.00	1,154.13
05/03/23	1000298376	844.60	0.00	0.00	844.60
05/05/23	1000298370	393.78	0.00	0.00	393.78
06/08/23	1000303920	1,378.75	0.00	0.00	1,378.75
07/10/23	1000340021	525.42	0.00	0.00	525.42
08/24/23	1000397908	1,093.54	0.00	0.00	1,093.54
09/14/23	1000397017	138.87	0.00	0.00	138.87
10/16/23	1000417401	410.41	0.00	0.00	410.41
12/08/23	1000433412	1,361.30	0.00	0.00	1,361.30
01/16/24	1000519190	216.60	0.00	0.00	216.60
02/12/24	1000557004	779.07	0.00	0.00	779.07
03/15/24	1000596622	66.69	0.00	0.00	66.69
05/20/24	1000576022	1,201.74	0.00	0.00	1,201.74
06/11/24	1000684471	943.71	0.00	0.00	943.71
07/08/24	1000709024	2,149.60	0.00	0.00	2,149.60
09/18/24	1000776080	681.71	0.00	0.00	681.71
10/07/24	1000778333	1,907.14	0.00	0.00	1,907.14
10/16/24	1000812870	1,581.04	0.00	0.00	1,581.04
11/06/24	1000834982	1,676.05	0.00	0.00	1,676.05
12/13/24	1000866536	1,113.05	0.00	0.00	1,113.05
01/15/25	1000896036	1,585.19	0.00	0.00	1,585.19
04/28/25	1000999077	903.62	0.00	0.00	903.62
04/28/25	1000999080	296.02	0.00	0.00	296.02
04/28/25	1000999081	560.86	0.00	0.00	560.86
05/06/25	1001012395	298.65	0.00	0.00	298.65
06/09/25	1001048181	1,238.74	0.00	0.00	1,238.74
07/24/25	1001089510	1,292.30	0.00	0.00	1,292.30
08/14/25	1001105870	3,828.80	0.00	0.00	3,828.80
09/15/25	1001137943	2,619.80	0.00	0.00	2,619.80
	Totals:	\$ 37,771.88	\$ 0.00	\$ 0.00	\$ 37,771.88

KBH:LC

<u>Description of Professional Services Rendered:</u>

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/25	Kara B. Hendricks	Participate in call with G. Winkler, J. Hall, A. Eklund, K. Andrassy and TX team regarding asset recovery efforts and pending third party recovery efforts;	0.20	96.07
09/08/25	Kara B. Hendricks	Correspond with A. Eklund regarding investor question regarding proposed BofA settlement;	0.10	48.02
09/12/25	Steph Morrill	Updates and clean up to matter chart to remove older filings and tasks to archive portion;	0.30	52.50
09/18/25	Kara B. Hendricks	Phone call from M. Kageyama and follow- up with A. Eklund regarding payments;	0.10	48.02
09/29/25	Kara B. Hendricks	Review emails regarding non payment by Nicholas and provide signed judgment to J. Moore for filing;	0.20	96.05
09/30/25	Kara B. Hendricks	Review emails regarding BOA settlement status; Review emails regarding Nicholas and follow-up regarding judgment;	0.30	144.07

Total Hours: 1.20

> Total Amount: \$ 484.73

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY **Summary of Fees (Base Rates)**

Timekeeper Name		Hours Billed	Base Rate	T	otal \$ Amount
Kara B. Hendricks		0.90	565.00		508.50
Steph Morrill	_	0.30	175.00		52.50
	Totals:	1.20		\$	561.00
Summary of Fees	s (Discounted	Rates)			
Timekeeper Name		Hours Billed	Average	T	otal \$ Amount
			Discounted Rate		
Kara B. Hendricks		0.90	480.26		432.23
Steph Morrill	_	0.30	175.00		52.50
	Totals:	1.20		\$	484.73

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/09/25	Kara B. Hendricks	Correspond with A. Eklund on response to investor question regarding objections to settlement;	0.10	48.02
		Total Hours:	0.10	

Total Amount:

\$ 48.02

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

Timekeeper Name	Hours Billed	Base Rate	T	otal \$ Amount
Kara B. Hendricks	0.10	565.00	56.50	
Tot	eals: 0.10		\$	56.50
Summary of Fees (Disc	counted Rates)			
Timekeeper Name	Hours Billed	Average Discounted Rate	Т	otal \$ Amount
Kara B. Hendricks	0.10	480.20		48.02
Tot	tals: 0.10		\$	48.02

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Totals:

Summary of Fees (Base Rates)

<u>Timekeeper</u>	<u>Hours</u>	Rate	<u>Amount</u>
Kara B. Hendricks	1.00	565.00	565.00
Steph Morrill	0.30	175.00	52.50
Totals:	1.30		\$ 617.50
Summary of Face (Discounted Pates)			
Summary of Fees (Discounted Rates)			
<u>Timekeeper</u>	<u>Hours</u>	Rate	<u>Amount</u>
Kara B. Hendricks	1.00	480.25	480.25
Steph Morrill	0.30	175.00	52.50

1.30

\$

532.75

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 38 of 58

Invoice No.: 1001156759 Page 5

Re: Profit Connect Receivership

Matter No.: 209375.010200

<u>Description of Expenses Billed</u>:

<u>DATE</u> <u>DESCRIPTION</u> <u>AMOUNT</u>

No expenses charged to this file

Invoice No.: 1001137884 File No. : 209375.010900

Bill Date : September 15, 2025

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

INVOICE

Re: Profit Connect Promoters & Employees

Legal Services through August 31, 2025:

Total Fees: \$ 1,761.20

Expenses:

Filing Fees 405.00

Total Expenses: \$ 405.00

Current Invoice: \$ 2,166.20

KBH:LC

3/25 Page 40 of 58

Invoice No.: 1001137884 File No. : 209375.010900

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

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF FILE NUMBER: 209375.010900 INVOICE NUMBER: 1001137884*
BILLING PROFESSIONAL: Kara B. Hendricks

 Current Invoice:
 \$ 2,166.20

 Total Amount Due:
 \$ 2,166.20

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK

ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK

ABA# 063107513

CREDIT TO: GREENBERG TRAURIG

ACCOUNT #: 2000014648663

PLEASE

REFERENCE: CLIENT NAME: WINKLER, GEOFF

FILE NUMBER: 209375.010900 INVOICE NUMBER: 1001137884*

BILLING

PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig PO Box 936769 ATLANTA GA 31193-6769

KBH:LC

Invoice No.: 1001137884 File No. : 209375.010900

Wire fees may be assessed by your bank.

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

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

KBH:LC

<u>Description of Professional Services Rendered:</u>

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	DESCRIPTION	<u>HOURS</u>	<u>AMOUNT</u>
08/14/25	Kara B. Hendricks	Correspond with A. Eklund regarding information provided by B. Fouts and next steps; Confer with E. Escobar-Gaddi regarding filing of new complaint and related documents needed for filing including summons;	0.40	228.80
08/15/25	Kara B. Hendricks	Review and revise certificate of interested parties and notice of related cases (1.2); Follow-up with E. Escobar-Gaddi regarding filing (.1); Request M. Coles assistance with additional notice of related cases (.1); Request S. Morrill assistance with updated summons with defendant addresses (.1);	1.50	858.00
08/16/25	Steph Morrill	Update summons for all named defendants to include residence address, circulating to K.Hendricks and E.Escobar-Gaddi for further review and issuance;	0.40	110.40
08/18/25	Kara B. Hendricks	Prepare notices of related cases to file in SEC Action and Roshak action and coordinate filing; Return call to B. Fouts; Correspond with A. Eklund regarding B. Fouts; Review summons and follow-up with E. Escobar-Gaddi and S. Morrill regarding next steps;	0.90	514.80
08/19/25	Kyle Ewing	Email communication with G. Winkler remedia inquiry recomplaint filed against promoters and other third parties associated with Profit Connect	0.10	49.20
		Total Hours:	3.30	

ASSET ANALYSIS AND RECOVERY

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	 Total \$ Amount
Kyle Ewing		0.10	615.00	61.50
Kara B. Hendricks		2.80	715.00	2,002.00
Steph Morrill		0.40	345.00	138.00
	Totals:	3.30		\$ 2,201.50

Total Amount:

\$ 1,761.20

Summary of Fees (Discounted Rates)

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 43 of 58

Timekeeper Name	Hours Billed	Average Discounted Rate	 Total \$ Amount
Kyle Ewing	0.10	492.00	49.20
Kara B. Hendricks	2.80	572.00	1,601.60
Steph Morrill	0.40	276.00	 110.40
Totals:	3.30		\$ 1,761.20

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Summary of Fees (Base Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kyle Ewing		0.10	615.00	61.50
Kara B. Hendricks		2.80	715.00	2,002.00
Steph Morrill		0.40	345.00	138.00
	Totals:	3.30		\$ 2,201.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kyle Ewing		0.10	492.00	49.20
Kara B. Hendricks		2.80	572.00	1,601.60
Steph Morrill		0.40	276.00	110.40
	Totals:	3.30		\$ 1,761.20

Case 2:21-cv-01298-JAD-BNW Filed 12/03/25 Page 46 of 58 Document 265-2

Invoice No.: 1001137884 Page 5

Re: **Profit Connect Promoters & Employees**

Matter No.: 209375.010900

<u>Description of Expenses Billed</u>:

<u>DATE</u> **DESCRIPTION AMOUNT**

VENDOR: Kinsey, Teri INVOICE#: 120012 DATE: 8/20/2025 08/15/25

405.00 \$ Filing Fee; 08/15/2025 Complaint Filing Fee.; Merchant: GTCC

COURTS/USDC-NV

Total Expenses: \$ 405.00

Invoice No.: 1001156765 File No. : 209375.010900 Bill Date : October 10, 2025

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

INVOICE

Re: Profit Connect Promoters Employees

Legal Services through September 30, 2025:

Total Fees: \$ 9,745.20

Expenses:

Service Company Charges 2,270.00 Information and Research 486.40

Total Expenses: \$ 2,756.40

Current Invoice: \$ 12,501.60

Previous Balance (see attached statement): \$ 2,166.20

Total Amount Due: \$ 14,667.80

KBH:LC

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Invoice No.: 1001156765 File No. : 209375.010900

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

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT

Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF **FILE NUMBER:** 209375.010900 **INVOICE NUMBER:** 1001156765* **BILLING PROFESSIONAL: Kara B. Hendricks**

> Current Invoice: \$ 12,501.60 Previous Balance: \$ 2,166.20 Total Amount Due: \$ 14,667.80

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK

ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK

ABA# 063107513

CREDIT TO: GREENBERG TRAURIG

ACCOUNT #: 2000014648663

PLEASE

REFERENCE: WINKLER, GEOFF **CLIENT NAME:**

> **FILE NUMBER:** 209375.010900 1001156765* **INVOICE NUMBER:**

BILLING

PROFESSIONAL: Kara B. Hendricks

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

Greenberg Traurig PO Box 936769

KBH:LC

Invoice No.: 1001156765 File No. : 209375.010900

ATLANTA GA 31193-6769

Wire fees may be assessed by your bank.

 $\ensuremath{^*}$ If paying more than one invoice, please reference all invoice numbers in wiring instructions.

Please contact <u>acct-cashreceipts@gtlaw.com</u> for any payment related questions.

KBH:LC

Invoice No.: 1001156765 File No. : 209375.010900

Account Statement

<u>Date</u>	Invoice #	Fees Due	:	Expenses Due	Other Due	Total Due
09/15/25	1001137884	1,761.20		405.00	0.00	2,166.20
	Totals:	\$ 1,761.20	\$	405.00	\$ 0.00	\$ 2,166.20

KBH:LC

<u>Description of Professional Services Rendered:</u>

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

DATE	TIMEKEEPER	DESCRIPTION	<u>HOURS</u>	<u>AMOUNT</u>
09/04/25	Kara B. Hendricks	Review email and settlement proposal from R. Ryan regarding W. Divine; Correspond with R. Ryan and follow-up with G. Winkler;	0.30	171.60
09/05/25	Kara B. Hendricks	Return call to B. Fouts and send follow-up email;	0.20	114.40
09/09/25	Kara B. Hendricks	Review email from R. Ryan and follow-up with G. Winkler regarding W. Divine settlement proposal; Follow-up with R. Ryan regarding potential resolution; Request M. Coles assistance with Divine settlement agreement and motion to get approval;	0.50	286.00
09/10/25	Madeleine Coles	Draft settlement agreement for settlement with W. Divine	0.80	272.00
09/10/25	Kara B. Hendricks	Discuss Divine settlement agreement preparation with M. Coles;	0.10	57.20
09/10/25	Kara B. Hendricks	Review emails with B. Fouts regarding potential settlement;	0.10	57.20
09/11/25	Madeleine Coles	Revise W. Divine settlement agreement	0.40	136.00
09/11/25	Madeleine Coles	Draft motion to approve settlement with W. Divine	0.60	204.00
09/11/25	Kara B. Hendricks	Review service summary and follow-up with G. Winkler and A. Eklund for assistance with obtain updated address information; Review draft Devine settlement agreement and follow-up with M. Coles regarding revisions; Send draft to G. Winkler for review and comment; Provide draft settlement agreement to R. Ryan (for Divine);	0.80	457.60
09/12/25	Kara B. Hendricks	Correspond with R. Ryan regarding Divine settlement; request M. Coles assistance with preparation of motion to approve settlement;	0.30	171.60
09/16/25	Kara B. Hendricks	Telephone call from D. Williams regarding lawsuit and location of B. Smith (.4); Discuss Williams position and case strategy with G. Winkler and prepare confirming email (.7); Review motion to dismiss filed by David Bruerd (.3);	1.40	800.80
09/16/25	Steph Morrill	Review of Bruerd Motion to Dismiss against timeline of correspondence sent to Bruerd and follow up with K.Hendricks, providing dates;	0.20	55.20
09/18/25	Kara B. Hendricks	Finali e motion to approve Divine settlement;	0.20	114.40

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 52 of 58

09/19/25	Kara B. Hendricks	Review motion to dismiss filed by Vodat; Email J. del Castillo for prior briefing	0.10	57.20
09/19/25	Steph Morrill	related to similar motions; Review of motion to dismiss by Voydat and updates to matter chart reflecting filling of summons returned executed and deadlines with respect to response to complaint by each named defendant, and related response deadlines to Voydat motion to dismiss;	0.60	165.60
09/22/25	Kara B. Hendricks	Request S. Shevorski assistance with opposition to motion to dismiss and provide initial background;	0.30	171.60
09/22/25	Steven G. Shevorski	Begin preparation for drafting clients responses to the respective motions to dismiss on file - review complaint and motions.	1.00	500.00
09/23/25	Steph Morrill	Communication to S.Shevorski regarding motions to dismiss (Voydat and Bruerd) response deadlines and providing history of letter communications from Receiver/GT to each (.2); Updates to tracker related to progress made with Brian Fouts, settlement with William Divine, and reach out by David Williams (also relating to Brian Smith) (1.3);	1.50	414.00
09/25/25	Steven G. Shevorski	Begin draft of background in response to Bruerd's motion to dismiss.	0.80	400.00
09/25/25	Steven G. Shevorski	Complete initial draft of opposition to Bruerd's motion to dismiss on statute of limitations grounds - all sections.	4.20	2,100.00
09/26/25	Kara B. Hendricks	Review and revise response in opposition to Bruerd motion to dismiss and correspond with S. Shevorski regarding same; Send draft to G. Winkler for review;	0.60	343.20
09/26/25	Steven G. Shevorski	Complete draft of client's opposition to Voydat's motion to dismiss - all sections.	3.20	1,600.00
09/29/25	Steph Morrill	Review of Gutterman motion to dismiss filing and historical notes from promoter- employee tracker; Correspondence to S.Shevorski providing Gutterman motion to dismiss deadlines and summary of	0.20	55.20
09/30/25	Kara B. Hendricks	AFS/Receiver correspondence to same; Follow-up with G. Winkler regarding opposition (Bruerd); Finali e motion and work with E. Escobar-Gaddi to file; Review and revise Voydat response in opposition to motion to dismiss and send to G. Winkler for review;	0.80	457.60
09/30/25	Steven G. Shevorski	Begin draft of opposition to motion to dismiss (Guetterman).	1.00	500.00

Total Hours:

Total Amount: \$ 9,662.40

20.20

TIMEKEEPER SUMMARY FOR TASK CODE GW001,

ASSET ANALYSIS AND RECOVERY

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	Total \$ Amount
Kara B. Hendricks		5.70	715.00	4,075.50
Madeleine Coles		1.80	425.00	765.00
Steven G. Shevorski		10.20	625.00	6,375.00
Steph Morrill	_	2.50	345.00	862.50
	Totals:	20.20		\$ 12,078.00
Summary of Fees	(Discounted	Rates)		
Timekeeper Name	<u> </u>	Hours Billed	Average Discounted Rate	 Total \$ Amount
Kara B. Hendricks		5.70	572.00	3,260.40
Madeleine Coles		1.80	340.00	612.00
Steven G. Shevorski		10.20	500.00	5,100.00
Steph Morrill	_	2.50	276.00	 690.00
	Totals:	20.20		\$ 9,662.40

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/25	Steph Morrill	Updates to matter chart reflecting response deadlines for all served Defendants;	0.30	82.80
		Total Hours:	0.30	
		Total	Amount:	\$ 82.80

TIMEKEEPER SUMMARY FOR TASK CODE GW004,

CASE ADMINISTRATION

Summary of Fees (Base Rates)

Timekeeper Name		Hours Billed	Base Rate	Total \$ Amount
Steph Morrill	_	0.30	345.00	 103.50
	Totals:	0.30		\$ 103.50
Summary of Fees	(Discounted	Rates)		
Timekeeper Name		Hours Billed	Average	Total \$ Amount
			Discounted Rate	
Steph Morrill		0.30	276.00	82.80
	Totals:	0.30		\$ 82.80

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

Summary of Fees (Base Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kara B. Hendricks		5.70	715.00	4,075.50
Madeleine Coles		1.80	425.00	765.00
Steven G. Shevorski		10.20	625.00	6,375.00
Steph Morrill	_	2.80	345.00	966.00
	Totals:	20.50		\$ 12,181.50

Summary of Fees (Discounted Rates)

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Amount</u>
Kara B. Hendricks		5.70	572.00	3,260.40
Madeleine Coles		1.80	340.00	612.00
Steven G. Shevorski		10.20	500.00	5,100.00
Steph Morrill		2.80	276.00	772.80
	Totals:	20.50		\$ 9,745.20

Invoice No.: 1001156765 Page 7

Re: Profit Connect Pro oters E p o ees

Matter No.: 209375.010900

<u>Description of Expenses Billed</u>:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
08/31/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040475 DATE: 8/31/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT	\$ 60.00
08/31/25	BETHANY VOYDAT (INV. 14040475 VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040411 DATE: 8/31/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT	\$ 40.00
09/02/25	DAVID BRUERD (INV. 14040411 VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040431 DATE: 9/2/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT	\$ 145.00
09/04/25	DAVID WILLIAMS (INV. 14040431 VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040447 DATE: 9/4/2025 FEE FOR ATTEMPTS AT PROCESS OF SERVICE OF SUMMONS COMPLAINT JOHN CIGER (INV. 14040447)	\$ 95.00
09/04/25	COMPLAINT JOHN GIGER (INV. 14040447 VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040417 DATE: 9/4/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT JOHN GUETTERMAN (INV. 14040417	\$ 170.00
09/07/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040425 DATE: 9/7/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT STAN POPHAL (INV. 14040425	\$ 135.00
09/07/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040493 DATE: 9/7/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT WILLIAM DIVINE (INV. 14040493	\$ 110.00
09/08/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040481 DATE: 9/8/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT BRIAN FOUTS (INV. 14040481	\$ 85.00
09/08/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040410 DATE: 9/8/2025 FEE FOR ATTEMPTS OF PROCESS OF SERVICE OF SUMMONS	\$ 150.00
09/08/25	COMPLAINT ARNOLD THOMPSON (INV. 14040410 VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040433 DATE: 9/8/2025 FEE FOR SERVICE ATTEMPTS OF THE SUMMONS COMPLAINT	\$ 135.00
09/10/25	KOKO HUNT (INV. 14040433 VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040445 DATE: 9/10/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT MICHAEL MARTIN (INV. 14040445	\$ 110.00

Case 2:21-cv-01298-JAD-BNW Document 265-2 Filed 12/03/25 Page 58 of 58

Invoice No.: Re: Matter No.:	1001156765 Profit Connect Pro oters E p o ees 209375.010900	Page 8
Description of	^F E penses i ed	
09/12/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040436 DATE: 9/12/2025 FEE FOR SERVICE ATTEMPTS OF THE SUMMONS COMPLAINT JENNIFER KNIGHT (INV. 14040436	\$ 95.00
09/15/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040516 DATE: 9/15/2025 FEE FOR SERVICE ATTEMPTS OF THE SUMMONS COMPLAINT ERIC GARRISON (INV. 14040516	\$ 60.00
09/15/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040441 DATE: 9/15/2025 FEE FOR SERVICE ATTEMPTS OF THE SUMMONS COMPLAINT BRIAN SMITH (INV. 14040441	\$ 110.00
09/15/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040421 DATE: 9/15/2025 FEE FOR ATTEMPTS AT PROCESS OF SERVICE OF SUMMONS COMPLAINT SHANE RYAN (INV. 14040421	\$ 130.00
09/15/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040455 DATE: 9/15/2025 FEE FOR SERVICE ATTEMPTS OF SUMMONS COMPLAINT VERLYN HARRIS (INV. 14040455	\$ 110.00
09/15/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040438 DATE: 9/15/2025 FEE FOR ATTEMPTS OF PROCESS OF SERVICE OF SUMMONS COMPLAINT TALMADGE PETERSON (INV. 14040438	\$ 95.00
09/15/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040428 DATE: 9/15/2025 FEE FOR ATTEMPTS OF PROCESS OF SERVICE OF SUMMONS COMPLAINT BRANDON MOODY (INV. 14040428	\$ 95.00
09/16/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040488 DATE: 9/16/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT JEFF STEPHAN (INV. 14040488	\$ 135.00
09/16/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14040460 DATE: 9/16/2025 Description: FEE FOR ATTEMPTS AT PROCESS OF SERVICE OF SUMMONS COMPLAINT OMEGA ELECTRIC (INV. 14040460 PLEASE INCLUDE THIS INFORMATION)	\$ 60.00
09/17/25	VENDOR: Ace Executive Services, LLC-4251 INVOICE#: 14164974 DATE: 9/17/2025 FEE FOR PROCESS OF SERVICE OF SUMMONS COMPLAINT BRIAN SMITH NEW ADDRESS (INV. 14164974)	\$ 145.00
09/25/25	WestlawNext Research by STEVEN SHEVORSKI on 09/25/2025 - Re: 209375.010900	\$ 486.40
	Total Expenses:	\$ 2,756.40

EXHIBIT 3

EXHIBIT 3

DECLARATION OF KYRA E. ANDRASSY

1	KARA B. HENDRICKS, ESQ.	
2	Nevada Bar No. 07743 KYLE A. EWING, ESQ.	
2	Nevada Bar No. 14051	
3	GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600	
4	Las Vegas, Nevada 89135	
5	Telephone: (702) 792-3773 Facsimile: (702) 792-9002	
6	Email: hendricksk@gtlaw.com ewingk@gtlaw.com	
7	KYRA E. ANDRASSY, ESQ.* *Admitted Pro Hac Vice	
8	RAINES FELDMAN LITTRELL LLP 4675 MacArthur Court, Suite 1550	
9	Newport Beach, CA 92660 Telephone: (310) 440-4100	
10	Facsimile: (310) 691-1943 Email: kandrassy@raineslaw.com	
11		
12	Attorneys for Receiver, Geoff Winkler of American Fiduciary Servi	ces
13	IN THE UNITED STAT	TES DISTRICT COURT
14	FOR THE DISTR	ICT OF NEVADA
15		
16	SECURITIES AND EXCHANGE COMMISSION,	Case No.: 2:21-cv-01298-JAD-BNW
17	Plaintiff,	DECLARATION OF KYRA E. ANDRASSY IN SUPPORT OF THE
18	V.	SEVENTEENTH APPLICATION FOR ALLOWANCE AND PAYMENT OF
19	PROFIT CONNECT WEALTH SERVICES,	FEES AND COSTS OF THE RECEIVER AND HIS
20	INC., JOY I. KOVAR, and BRENT CARSON KOVAR,	PROFESSIONALS FOR THE PERIOD FROM JULY 1, 2025, THROUGH
21	Defendants.	SEPTEMBER 30, 2025
22		
23		
24	I, Kyra E. Andrassy, Esq. declare as follows:	lows:
25	1. I am over 21 years old and am	a partner with Raines Feldman Littrell LLP.
26	am licensed to practice in California and have	peen admitted pro hac vice for purposes of th
27	case.	
28		
	1	

- 2. By virtue of my position with Raines Feldman Littrell (the "Firm"), I am competent to testify to the matters presented in this declaration, and I submit this declaration in support of the Receiver's Seventeenth Application for Allowance and Payment of Fees and Costs of the Receiver and His Professionals for the Period from July 1, 2025, Through September 30, 2025 (the "Application"), in connection with Profit Connect Wealth Services, Inc. This declaration is based on my personal knowledge, except when made on information and belief, and as to those matters, I believe them to be true.
- 3. Attached to this declaration as Exhibit A is a true and correct copy of the invoice for the services of the Firm for the period from July 1, 2025, through September 30, 2025 (the "Application Period").
- 4. In the ordinary course of the Firm's business, we keep a record of all time expended by our professionals in the rendering of professional services on a computerized billing system.
- 5. At or near the time the professional services are rendered, professionals of the firm record (a) the description of the nature of the services performed, (b) the duration of the time expended, and (c) the client/matter name or number by either: (1) writing such information on a time sheet, or (2) inputting such information directly into the firm's computer billing system.
- 6. The Firm's computer billing system keeps a record of all time spent on a client/matter, the professional providing the services, and a description of the services rendered. The firm's computer billing system automatically multiplies the time expended by each professional by the respective professional's billing rate to calculate the amount of the fee. The Firm conducts its business in reliance on the accuracy of such business records. The billing system generates invoices, like those attached here. For the invoices attached here, I confirm that I have reviewed and edited, as appropriate, each of them.
- 7. As reflected in the attached invoice, during the Application Period, the Firm continued to work to resolve a potential claims against Chase Bank. The parties are in settlement discussions with a tolling agreement in place. The Firm also worked with special

EXHIBIT A

EXHIBIT A

RAINES FELDMAN LLP INVOICES



Raines Feldman Littrell LLP

1900 Avenue of the Stars, 19th Floor Los Angeles, CA 90067 (310) 440-4100 www.raineslaw.com

Federal Tax ID: 20-4515337

Invoice Date: 11/12/2025 Invoice Number: 141405

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

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

7571-001 / Profit Connect Wealth Services, Inc.

Professional	Services	;		Hours	Rate	Amount
07/03/2025	KEA	D01	Exchange of correspondence with Receiver regarding notice to claimants	0.10	535.50	53.55
07/29/2025	KEA	D01	Prepare correspondence to client regarding Amazon subpoena	0.10	535.50	53.55
07/29/2025	KEA	D01	Review and execute attestation regarding health care information required by WA law regarding Amazon subpoena and return to counsel	0.10	535.50	53.55
08/06/2025	KEA	D01	Meeting regarding status of various outstanding claims	0.40	535.50	214.20
08/19/2025	KEA	D01	Review and revise confidentiality agreement with Amazon and prepare correspondence to counsel regarding same	0.10	535.50	53.55
08/19/2025	KEA	D01	Exchange of correspondence with counsel for Chase regarding Amazon production	0.10	535.50	53.55
08/26/2025	KEA	D01	Review and execute Amazon confidentiality agreement	0.10	535.50	53.55
08/28/2025	KEA	D01	Quick review of Amazon production; forward to counsel for Chase after agreement to be bound by confidentiality agreement with Amazon	0.20	535.50	107.10
09/04/2025	KEA	D01	Meeting regarding status of open litigation items	0.20	535.50	107.10
09/05/2025	KEA	D01	Analysis of Amazon production to formulate settlement offer proposal for Receiver regarding Chase	0.70	535.50	374.85
09/12/2025	KEA	D01	Prepare correspondence to C. Rivas with settlement offer	0.10	535.50	53.55

09/18/2025	KEA	D01	Prepare updated Chase tolling agreement and circulate to counsel for Chase	0.10	535.50	53.55
09/18/2025	KEA	D01	Prepare correspondence to Receiver and team regarding status of Chase	0.10	535.50	53.55
09/22/2025	KEA	D01	Exchange of emails with C. Rivas regarding settlement	0.10	535.50	53.55
09/24/2025	KEA	D01	Prepare correspondence to C. Rivas regarding tolling agreement	0.10	535.50	53.55
09/26/2025	KEA	D01	Exchange of correspondence with C. Rivas regarding tolling agreement and revise same regarding deadline and recirculate	0.10	535.50	53.55
07/30/2025	KEA	D04	Revise litigation section of status report	0.10	535.50	53.55
08/25/2025	KEA	D04	Review agenda for investor call and exchange of emails with receiver's office regarding same	0.10	535.50	53.55
07/07/2025	KEA	D10	Exchange of correspondence with AFS regarding email notice to PC claimants regarding opt out	0.10	535.50	53.55
09/25/2025	KEA	D10	Exchange of correspondence with Marcelo Diaz-Cortes regarding BofA settlement and opt out status	0.10	535.50	53.55
09/30/2025	KEA	D10	Exchange of various emails regarding no opt outs and no objections to BANA settlement	0.10	535.50	53.55
09/30/2025	KEA	D10	Revise final approval order to include dates and docket numbers and language not relevant since no objections received	0.20	535.50	107.10
09/30/2025	KEA	D10	Preparation of Winkler declaration regarding compliance with preliminary order notice requirements and forward to Receiver's team for input/approval	0.40	535.50	214.20
08/13/2025	KEA	D13	Prepare declaration for fee application [No Charge]	0.20	0.00	No Charge
				Sub-total Fees:		\$2,034.90
Expenses						
07/01/2025	07/01/2025 First Legal Network: Pick-Up from: Raines Feldman Littrell LLP; Deliver to: U.S. DISTRICT COURT DISTRICT OF NEV; PDF COURTESY DELRUSH; Job Date: 06/13/2025; Ctrl No: 14088336; Inv. #11083794					
				Sub-total Expenses:		\$202.50
				Total Current Billing:		\$2,237.40

\$8,349.45

(\$4,874.94)

Previous Balance Due:

Total Payments:

Total Now Due: \$5,711.91

Rate Summary

Kyra E. Andrassy 0.20 hours at \$0.00/hr \$0.00 Kyra E. Andrassy 3.80 hours at \$535.50/hr \$2,034.90

Total hours: 4.00 \$2,034.90

Payments

09/18/2025 Payment WIRE: Geoffrey Winkler 4,874.94

> \$4,874.94 **Sub-total Payments:**

Payment Terms: Due Upon Receipt

Payment Options:

Pay Online:

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

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

Pay by Wire/ACH:

Wells Fargo Bank, N.A. Routing No.: 121000248 Account No.: 4941981821 BIC/Swift Code: WFBIUS6S

Account Title: Raines Feldman Littrell LLP

Client Name & Invoice #

Pay by Check via Mail:

Raines Feldman Littrell LLP PO Box 848574 Los Angeles, CA 90084-8574

EXHIBIT 4

EXHIBIT 4

DECLARATION OF SAM BASTAWROS

1	KARA B. HENDRICKS, ESQ.		
	Nevada Bar No. 07743		
2	KYLE A. EWING, ESQ. Nevada Bar No. 14051		
3	GREENBERG TRAURIG, LLP		
	10845 Griffith Peak Drive, Suite 600		
4	Las Vegas, Nevada 89135		
_	Telephone: (702) 792-3773		
5	Facsimile: (702) 792-9002		
6	Email: hendricksk@gtlaw.com ewingk@gtlaw.com		
0	ewingk@gnaw.com		
7	KYRA E. ANDRASSY, ESQ.*		
	*Admitted Pro Hac Vice		
8	RAINES FELDMAN LITTRELL LLP		
9	4675 MacArthur Court, Suite 1550 Newport Beach, CA 92660		
	Telephone: (310) 440-4100		
10	Facsimile: (310) 691-1943		
	Email: kandrassy@raineslaw.com		
11	Attornava for Daggivar		
12	Attorneys for Receiver, Geoff Winkler of American Fiduciary Service	es	
13	IN THE UNITED STAT	ES DISTRICT COURT	
14	IN THE UNITED STAT	ES DISTRICT COURT	
17	FOR THE DISTR	ICT OF NEVADA	
15			
1.0	SECURITIES AND EXCHANGE	Case No.: 2:21-cv-01298-JAD-BNW	
16	COMMISSION,	DECLARATION OF SAM	
17	Plaintiff,	BASTAWROS IN SUPPORT OF THE	
	2,	SEVENTEENTH APPLICATION FOR	
18	V.	ALLOWANCE AND PAYMENT OF	
19	DDOELT CONNECT WEALTH SERVICES	FEES AND COSTS OF THE	
19	PROFIT CONNECT WEALTH SERVICES, INC., JOY I. KOVAR, and BRENT	RECEIVER AND HIS PROFESSIONALS FOR THE PERIOD	
20	CARSON KOVAR,	FROM JULY 1, 2025, THROUGH	
	·	SEPTEMBER 30, 2025	
21	Defendants.		
22			
23			
24			
24	I, Sam Bastawros, declare as follows:		
25	1. I am over 21 years old and a Se	nior Project Manager at Technology Concepts	
2.6	1. I am over 21 years old and a se	moi Project Manager at Teenhology Concepts	
26	& Design, Inc. ("TCDI"). By virtue of my posit	ion with TCDI, I am competent to testify to the	
27	mottors presented in this declaration, and I submit this declaration in supment of the Decision?		
	matters presented in this declaration, and I submit this declaration in support of the Receiver's		
28	application for approval of his fees and costs of my firm and those of his professionals in		

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

- 2. Attached to this declaration is a true and correct copy of the invoices for the services of my firm for the period from July 1, 2025, through September 30, 2025 (the "Application Period"). TCDI acquired Stroz Friedberg's electronic discovery business prior to the Application Period and will continue to provide those services pursuant to the contract previously signed by the Receiver with Stroz Friedberg as it pertains to electronic discovery.
- 3. In the ordinary course of TCDI's business, we keep a record of all time expended by our professionals in the rendering of professional services on a computerized billing system.
- 4. At or near the time the professional services are rendered, professionals of the firm record (a) the description of the nature of the services performed, (b) the duration of the time expended, and (c) the client/matter name or number by either: (1) writing such information on a time sheet, or (2) inputting such information directly into the firm's computer billing system.
- 5. For the professionals who record their time using written time sheets, the information contained in the time sheets is transcribed into the firm's computer billing system.
- 6. The firm's computer billing system keeps a record of all time spent on a client/matter, the professional providing the services, and a description of the services rendered. The firm's computer billing system automatically multiplies the time expended by each professional by the respective professional's billing rate to calculate the amount of the fee. The firm conducts its business in reliance on the accuracy of such business records.
- 7. As reflected in the attached invoice, and pursuant to the Receivership Order (ECF No. 26) and the Order Authorizing Employment of Computer Forensic Experts (ECF No. 46), professionals at TCDI assisted the Receiver during the Application Period with management of the electronic discovery database.
- 8. Electronic Discovery Project managers are billed at \$195 per hour and engineers are billed at \$400 per hour.

C	ase 2:21-cv-01298-JAD-BNW	Document 265-4	Filed 12/03/25	Page 4 of 8
1	I declare under penalty of	perjury that the foreg	oing is true and cor	rect.
2	Executed on December 3,	2025.		
3				
4			m Bastawros Bastawros	
5		Decla		
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EXHIBIT A

EXHIBIT A

TCDI INVOICES



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

Bill To

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

Invoice

Date 7/31/2025 TCDI Invoice # AFS-07-2025-VCI

Terms Net 90

Due Date 10/29/2025

Currency USD

Project American Fiduciary - Project Valeria - Communication Int...

Matter ID

Memo July 2025 Professional Services

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

Item	Description	Qty	Units	Rate	Amount
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

Total \$8,073.10

Bank Details:

Bank Name: Truist Bank

Bank Account Name: Technology Concepts & Design, Inc.

Bank SWIFT: BRBTUS33 ACH Bank Routing (ABA) #: 021052053 ACH Bank Account #: 39876408

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

Remit Check Payment To:

Technology Concepts & Design, Inc. Attn: Accounts Receivable 4508 Weybridge Lane Greensboro, NC 27407-7876 336-232-5807

Please include Invoice # on your check.



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

Bill To

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

Invoice

Date 8/31/2025 TCDI Invoice # AFS-08-2025-VCI

Terms Net 90

Due Date 11/29/2025

Currency USD

Project American Fiduciary - Project Valeria - Communication Int...

Matter ID

Memo August 2025 Professional Services

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

Item	Description	Qty	Units	Rate	Amount
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

Total \$8,073.10

Bank Details:

Bank Name: Truist Bank

Bank Account Name: Technology Concepts & Design, Inc.

Bank SWIFT: BRBTUS33 ACH Bank Routing (ABA) #: 021052053 ACH Bank Account #: 39876408

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

Remit Check Payment To:

Technology Concepts & Design, Inc. Attn: Accounts Receivable 4508 Weybridge Lane Greensboro, NC 27407-7876 336-232-5807

Please include Invoice # on your check.



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

Bill To

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

Invoice

Date 9/30/2025 TCDI Invoice # AFS-09-2025-VCI

Terms Net 90

Due Date 12/29/2025

Currency USD

Project American Fiduciary - Project Valeria - Communication Int...

Matter ID

Memo September 2025 Professional Services

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

Item	Description	Qty	Units	Rate	Amount
Hosting (per GB)	Hosting (per GB)	807.31	GB	10.00	8,073.10

Total \$8,073.10

Bank Details:

Bank Name: Truist Bank

Bank Account Name: Technology Concepts & Design, Inc.

Bank SWIFT: BRBTUS33 ACH Bank Routing (ABA) #: 021052053 ACH Bank Account #: 39876408

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

Remit Check Payment To:

Technology Concepts & Design, Inc. Attn: Accounts Receivable 4508 Weybridge Lane Greensboro, NC 27407-7876 336-232-5807

Please include Invoice # on your check.

EXHIBIT 5

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[PROPOSED] ORDER

1 2 3 4 5 6	KARA B. HENDRICKS, ESQ. Nevada Bar No. 07743 KYLE A. EWING, ESQ. Nevada Bar No. 14051 GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 Telephone: (702) 792-3773 Facsimile: (702) 792-9002 Email: hendricksk@gtlaw.com ewingk@gtlaw.com				
7 8 9 10	KYRA E. ANDRASSY, ESQ.* *Admitted Pro Hac Vice RAINES FELDMAN LITTRELL LLP 4675 MacArthur Court, Suite 1550 Newport Beach, CA 92660 Telephone: (310) 440-4100 Facsimile: (310) 691-1943 Email: kandrassy@raineslaw.com				
12	Attorneys for Receiver, Geoff Winkler of American Fiduciary Service	ces			
13	IN THE UNITED STATES DISTRICT COURT				
14	FOR THE DISTR	ICT OF NEVADA			
15	SECURITIES AND EXCHANGE	Case No.: 2:21-cv-01298-JAD-BNW			
16	COMMISSION,	[PROPOSED] ORDER GRANTING			
17	Plaintiff,	THE SEVENTEENTH APPLICATION FOR ALLOWANCE AND PAYMENT			
18	V.	OF FEES AND COSTS OF THE			
19	PROFIT CONNECT WEALTH SERVICES, INC., JOY I. KOVAR, and BRENT	RECEIVER AND HIS PROFESSIONALS FOR THE PERIOD FROM JULY 1, 2025, THROUGH			
20	CARSON KOVAR,	SEPTEMBER 30, 2025			
21	Defendants.				
22					
23					
24					
25	The Court having reviewed the Seventee	enth Application for Allowance and Payment			
26	of Fees and Costs of the Receiver and His Professionals for the Period from July 1, 2025,				
27	Through September 30, 2025 (the "Application") and there being no opposition to the				
28	Application and the Court having found that cause exists to grant the Application,				

1 IT IS ORDERED AS FOLLOWS: 2 (1) The Application is approved; 3 Geoff Winkler (the "Receiver") and American Fiduciary Services are allowed (2) 4 \$42,921.00 in fees and \$3,501.51 in costs; 5 (3) Greenberg Traurig is allowed \$6,981.35 in fees related to the main receivership 6 action and \$11,506.40 related to the litigation against former employees and promoters; 7 (4) Raines Feldman Littrell LLP is allowed \$2,034.90 in fees and \$202.50 in costs; 8 (5) Technology Concepts & Design, Inc. is allowed \$24,219,30 in costs; and 9 **(7)** The Receiver is authorized to pay 80% of the allowed fees and 100% of the 10 allowed costs from funds on hand in the receivership estate. 11 IT IS SO ORDERED. 12 UNITED STATES DISTRICT COURT JUDGE 13 Dated this _____ day of ______, 2025. 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28