

1 DAVID R. ZARO (BAR NO. 124334)  
2 JOSHUA A. DEL CASTILLO (BAR NO. 239015)  
3 MATTHEW D. PHAM (BAR NO. 287704)  
4 ALLEN MATKINS LECK GAMBLE  
5 MALLORY & NATSIS LLP  
6 865 South Figueroa Street, Suite 2800  
7 Los Angeles, California 90017-2543  
8 Phone: (213) 622-5555  
9 Fax: (213) 620-8816  
10 E-Mail: dzaro@allenmatkins.com  
11 jdelcastillo@allenmatkins.com  
12 mpham@allenmatkins.com

13 Attorneys for Receiver  
14 GEOFF WINKLER

15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA  
17 WESTERN DIVISION

18 SECURITIES AND EXCHANGE  
19 COMMISSION,

20 Plaintiff,

21 vs.

22 RALPH T. IANNELLI and ESSEX  
23 CAPITAL CORP.,

24 Defendants.

Case No. 2:18-cv-05008-FMO-AFM

**DECLARATION OF GEOFF  
WINKLER IN SUPPORT OF  
SEVENTEENTH INTERIM  
APPLICATION OF RECEIVER,  
GEOFF WINKLER, AND HIS  
PROFESSIONALS FOR PAYMENT  
OF FEES AND REIMBURSEMENT  
OF EXPENSES**

Date: October 26, 2023  
Time: 10:00 am  
Ctrm: 6D  
Judge Hon. Fernando M. Olguin

25 I, Geoff Winkler, declare as follows:

26 1. I am the Court-appointed permanent receiver for defendant Essex  
27 Capital Corporation and its subsidiaries and affiliates (collectively, the  
28 "Receivership Entities"), having been appointed as the receiver for the Receivership  
Entities in the above-captioned action on December 21, 2018, by virtue of the  
Court's *Order Regarding Preliminary Injunction and Appointment of a Permanent  
Receiver*, ECF No. 66. I have personal knowledge of the facts stated in this

1 declaration and make this declaration in support of the concurrently filed  
2 seventeenth interim application for the payment of fees and the reimbursement of  
3 expenses (the "Fee Application") of myself, and my counsel of record, Allen  
4 Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins").

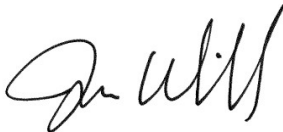
5 2. I have reviewed the Fee Application, and I believe that the fees and  
6 expenses requested therein are fair and reasonable and reflect an accurate  
7 representation of the work performed by Allen Matkins and myself and my staff.  
8 I likewise believe that the receivership estate of the Receivership Entities has  
9 benefited from the identified services.

10 3. As of June 30, 2023, I held approximately \$2 million for the benefit  
11 and administration of the Receivership Entities.

12 4. In accordance with plaintiff the Securities and Exchange Commission's  
13 billing guidelines, I have prepared a standardized funding accounting report, which  
14 runs through the end of the period covered by the Fee Application, a true and correct  
15 copy of which is attached to the Fee Application as **Exhibit 4**.

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

17 Executed on September 20, 2023, at Salem, Oregon.

18  
19 

20 \_\_\_\_\_  
21 Geoff Winkler