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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-AJRx

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

Date: April 25, 2024
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 nineteenth
2 interim application for the payment of fees and the reimbursement of expenses (the
3 "Fee Application") of myself, and my counsel of record, Allen Matkins Leck
4 Gamble Mallory & Natsis LLP ("Allen Matkins").

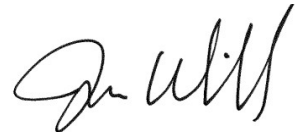
5 2. I have reviewed the Fee Application, and I believe that the fees and
6 expenses requested therein are fair and reasonable and reflect an accurate
7 representation of the work performed by Allen Matkins and myself and my staff.
8 I likewise believe that the receivership estate of the Receivership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

10 3. As of December 31, 2023, I held approximately \$2.3 million for the
11 benefit 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 3**.

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

17 Executed on March 26, 2024, at Salem, Oregon.

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20 _____
21 Geoff Winkler
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EXHIBIT 3

STANDARDIZED FUND ACCOUNTING REPORT for SEC v. Essex Capital Corporation

Receivership; Civil Docket No. 18-cv-05008-FMO-AFM

Reporting Period from 10/01/2023 to 12/31/2023

FUND ACCOUNTING (See instructions)		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 10/01/2023):	\$ 3,811,292.06		
	Increases in Fund Balance:			
Line 2	Business Income	\$ -		
Line 3	Cash and Securities (in transit)	-		
Line 4	Interest/Dividend Income	12,127.06		
Line 5	Business Asset Liquidation	47,122.00		
Line 6	Personal Asset Liquidation	-		
Line 7	Third-Party Litigation Income	625,000.00		
Line 8	Miscellaneous			
	Total Funds Available (Lines 1 - 8):		\$ 684,249.06	\$ 4,495,541.12
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors	(2,000,091.00)		
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	(109,827.19)		
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		\$ (2,109,918.19)	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments		-	
	Total Disbursements for Receivership Operations			\$ (2,109,918.19)
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator.....	\$ -		
	Independent Distribution Consultant (IDC).....	-		
	Distribution Agent.....	-		
	Consultants.....	-		
	Legal Advisers.....	-		
	Tax Advisers.....	-		
	2. Administrative Expenses	-		
	3. Miscellaneous	-		
	Total Plan Development Expenses		\$ -	
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator.....	-		
	IDC.....	-		
	Distribution Agent.....	-		
	Consultants.....	-		
	Legal Advisers.....	-		
	Tax Advisers.....	-		
	2. Administrative Expenses	-		
	3. Investor Identification:			
	Notice/Publishing Approved Plan.....	-		
	Claimant Identification.....	-		
	Claims Processing.....	-		
	Web Site Maintenance/Call Center.....	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses	-		
	Total Plan Implementation Expenses		\$ -	
	Total Disbursements for Distribution Expenses Paid by the Fund			\$ -
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$ -		
Line 12b	Federal Tax Payments	-		
	Total Disbursements to Court/Other:		\$ -	
	Total Funds Disbursed (Lines 9 - 11):			\$ (2,109,918.19)
Line 13	Ending Balance as of 12/31/2023			\$ 2,385,622.93
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		2,385,622.93	
Line 14b	Investments		1,480,000.00	
Line 14c	Other Assets or Uncleared Funds		1,090,000.00	
	Total Ending Balance of Fund - Net Assets			\$ 4,955,622.93

STANDARDIZED FUND ACCOUNTING REPORT for SEC v. Essex Capital Corporation
 Receivership; Civil Docket No. 18-cv-05008-FMO-AFM
 Reporting Period from 10/01/2023 to 12/31/2023

OTHER SUPPLEMENTAL INFORMATION:		Detail	Subtotal	Grand Total
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
<i>Line 15a</i>	<i>Plan Development Expenses Not Paid by the Fund</i>			
	1. Fees:			
	Fund Administrator	\$ -		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Miscellaneous	-		
	<i>Total Plan Development Expenses Not Paid by the Fund</i>		\$ -	
<i>Line 15b</i>	<i>Plan Implementation Expenses Not Paid by the Fund:</i>			
	1. Fees:			
	Fund Administrator	\$ -		
	IDC	-		
	Distribution Agent	-		
	Consultants	-		
	Legal Advisers	-		
	Tax Advisers	-		
	2. Administrative Expenses	-		
	3. Investor Identification:			
	Notice/Publishing Approved Plan	-		
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
	5. Miscellaneous	-		
	6. FAIR Reporting Expenses	-		
	<i>Total Plan Implementation Expenses Not Paid by the Fund</i>		\$ -	
<i>Line 15c</i>	<i>Tax Administrator Fees & Bonds Not Paid by the Fund</i>			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	Disbursements to Court/Other Not Paid by the Fund			
<i>Line 16a</i>	<i>Investment Expenses/CRIS Fees</i>		\$ -	
<i>Line 16b</i>	<i>Federal Tax Payments</i>		-	
	Total Disbursements to Court/Other Not Paid by the Fund:			\$ -
Line 17	DC & State Tax Payments			\$ -
Line 18	No. of Claims:			
<i>Line 18a</i>	<i># of Claims Received This Reporting Period</i>	0		
<i>Line 18b</i>	<i># of Claims Received Since Inception of Fund</i>	75		
Line 19	No. of Claimants/Investors:			
<i>Line 19a</i>	<i># of Claimants/Investors Paid This Reporting Period</i>	60		
<i>Line 19b</i>	<i># of Claimants/Investors Paid Since Inception of Fund</i>	64		

Receiver: Geoff Winkler

By: 

Geoff Winkler
(printed name)

Chief Executive Officer
 American Fiduciary Services LLC
 Receiver, Essex Capital Corporation, et al.

Date: January 31, 2024