

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
3 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
4 **GREENBERG TRAUIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
6 Telephone: (702) 792-3773
Facsimile: (702) 792-9002

7 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
8 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
9 **SEMENZA KIRCHER RICKARD**
10161 Park Run Drive, Suite 150
11 Las Vegas, Nevada 89145
12 Telephone: (702) 835-6803
Facsimile: (702) 920-8669

13 *Attorneys for Receiver, Geoff Winkler*

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

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

16 SECURITIES AND EXCHANGE COMMISSION,

17 Plaintiff,

18 vs.

19 MATTHEW WADE BEASLEY, *et al.*,

20 Defendants,

21 THE JUDD IRREVOCABLE TRUST, *et al.*,

22 Relief Defendants.

CASE NO. 2:22-cv-00612-CDS-EJY

**AMENDED FIRST APPLICATION
OF RECEIVER AND RECEIVER'S
PROFESSIONALS FOR
ALLOWANCE AND PAYMENT OF
FEES AND COSTS FOR THE
PERIOD FROM JUNE 3, 2022
THROUGH JUNE 30, 2022**

[Notice of Application; Memorandum of
Points and Authorities; and [Proposed]
Order submitted concurrently herewith]

24 Geoff Winkler, the Court-appointed Receiver (the "Receiver") pursuant to an Order
25 entered on June 3, 2022 (the "Receiver Order" or "Appointment Order") and further guidance from
26 the Court at the hearing on September 7, 2022, submits this amended application for allowance
27 and payment of his fees and costs and the fees and costs he, and the professionals he employed to
28 assist him in fulfilling his duties under the Receiver Order, incurred for the period from June 3

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
(702) 792-3773
(702) 792-9002 (fax)

1 through June 30, 2022 (the “Application Period”). The Receiver timely provided a draft and copies
 2 of billing entries to counsel for the Securities & Exchange Commission (“SEC”) and will address
 3 herein and in future submittals the comments provided. SEC counsel identified a small number
 4 of duplicate time entries (which have been removed), raised questions about several other entries,
 5 and requested that the Receiver and his professionals adjust certain billing practices in future
 6 invoices. With respect to this amended application, SEC counsel has informed the Receiver that
 7 the SEC does not oppose the allowance and payment of the requested fees and costs on an interim
 8 basis, as counsel confirmed in Court on September 7, 2022.

9 Because the Receiver is not a licensed attorney, does not have in-house counsel, and due
 10 to the scope of service needed during the Application Period he employed professionals to assist
 11 him in fulfilling his duties as the Receiver. Specifically, pursuant to Section 7(F) of the Receiver
 12 Order, the Receiver proposed retaining Greenberg Traurig LLP (“Greenberg Traurig”), Allen
 13 Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”), as counsel (ECF 90) and the law
 14 firm of Semenza Kircher Rickard (“Semenza Kircher”) as conflicts counsel (ECF 108). As further
 15 detailed in Section IV below, during the Reporting Period, the Receiver and his professionals
 16 endeavored to avoid duplication of efforts, and to undertake required tasks in as efficient a manner
 17 as possible, utilizing personnel best suited to the task. Additionally, Section IV provides detailed
 18 information to address questions raised by the Court regarding the complexity of the Receivers
 19 tasks, the value of the services provided, the quality of the work performed, the benefits obtained
 20 on behalf of the receivership estate, and the burden of the fee request on the receivership estate.

21 Pursuant to this Amended Application, the Receiver and his professionals seek approval of
 22 the following fees and costs for this Application Period, on an interim basis:

- 23 (1) Receiver fees of \$133,276.00¹ and costs of \$16,863.59;
- 24 (2) Greenberg Traurig fees of \$83,137.58² and costs of \$243.69;
- 25 (3) Allen Matkins fees of \$114,700.00 and costs of \$1,360.00; and
- 26 (4) Semenza Kircher fees of \$4,756.50 and costs of \$2,250.00.

27 _____
 28 ¹ This amount was decreased by \$3,431.50 from the original Application based on concerns raised by counsel for the SEC.

² This amount was decreased by \$972.85 from the original Application after duplicative entries were identified by counsel for the SEC.

1 By way of this Amended Application, the Receiver requests the Court's interim approval
2 of 100% of the fees and expenses incurred during the Application Period and further requests the
3 interim payment of 80% of such fees and 100% of such expenses, to be paid from the funds of the
4 receivership estate (the "Receivership Estate").

5 This Amended Application is based on the attached Memorandum of Points and
6 Authorities, the declarations attached hereto, the pleadings and papers on file herein, and such
7 other and further information as may be presented to the Court at the time of any hearing.

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

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

10 The SEC initiated this action against J&J Consulting Services, Inc., an Alaska corporation,
11 J&J Consulting Services, Inc., a Nevada corporation, J and J Purchasing LLC, The Judd
12 Irrevocable Trust and BJ Holdings LLC (collectively, the "J&J Receivership Defendants") and
13 others on April 12, 2022 (ECF No. 1) and concurrently with the Complaint filed an *ex parte* motion
14 for temporary restraining order seeking, among other things, the freezing of defendants' assets, an
15 accounting, an order prohibiting the destruction of documents seeking the appointment of a
16 receiver over the J&J Receivership Defendants (ECF No. 2). The Court granted the *ex parte*
17 temporary restraining order, in part, by allowing the asset freeze to proceed but set the motion for
18 a hearing in order to provide defendants an opportunity to be heard on the temporary receivership
19 request (ECF No. 3). On April 21, 2022, a hearing was held and the Court found grounds to enter
20 a preliminary injunction, asset freeze, and other equitable relief (ECF No. 56). Thereafter, on May
21 3, 2022 the SEC filed a motion to appoint receiver and requested related relief. (ECF No. 67). On
22 June 3, 2022 an Order was entered appointing Geoff Winkler as Receiver ("Receiver Order" or
23 "Appointment Order") (ECF 88). Mr. Winkler worked quickly to retain counsel and motions to
24 employ the same were filed in short order.

25 This Amended Application seeks approval for services performed by the Receiver, his team
26 at American Fiduciary Services LLC ("AFS") and his counsel at the law firms of Greenberg
27 Traurig, Allen Matkins, and Semenza Kircher from June 3, 2022 through June 30, 2022.³ Upon
28

³ The Court entered and Order granting the respective Motion to Employ on July 25, 2022 (ECF 219).

1 his appointment, the Receiver immediately began a diligent review of the business and financial
2 affairs of the Receivership Defendants and undertook efforts to marshal assets for the Receivership
3 Estate in furtherance of his Court-ordered duties and responsibilities.

4 In the first thirty days of the receivership, significant progress was made. Indeed, as of
5 June 30, 2022, the Receiver held cash of \$11,398,805.88 and assets believed to have a value of
6 over \$32 million. As is common in the early stages of a complex receivership involving hundreds
7 of millions of dollars in assets – here, the Receiver and his professionals were required to expend
8 significant time and effort to preserve the *status quo*, begin the recovery of receivership assets, and
9 commence their efforts to obtain financial documents and other information that will likely prove
10 critical to the administration of the Estate, the Receiver's evaluation of prospective creditor claims,
11 and any claw-back or disgorgement litigation that the Receiver ultimately determines, in his
12 reasonable business judgment, is required to recover assets for the benefit of the Estate and its
13 creditors. Among other things, during the Reporting Period, the Receiver, with the assistance of
14 counsel has (1) obtained control over certain bank accounts and funds held by the Defendants; (2)
15 established new bank accounts for recovered funds; (3) established a website to allow investors to
16 register to receive email notices of receivership filings and updates ([jjconsulting-](http://jjconsulting-receivership.com)
17 receivership.com); (4) investigated, analyzed, and drafted necessary documents to ensure that
18 Receivership property was properly preserved and where feasible transferred to the Receiver; (5)
19 recovered approximately \$5.4 million in funds turned over by numerous Receivership Defendants
20 or their agents; (6) obtained possession and control of numerous vehicles purchased with funds
21 raised by the Receivership Defendants, notably including a private aircraft valued at approximately
22 \$5.5 million and a Rolls Royce SUV valued in excess of \$575,000; (7) obtained possession of
23 millions of dollars in real property turned over by certain Receivership Defendants; (8) made
24 requisite 754 filings; (9) commenced the retrieval of essential documents relating to the business
25 and financial activities of the Receivership Defendants for the Receiver's later review and analysis;
26 (10) identified and monitored litigation proceedings which may impact receivership case;

1 (11) attended to critical deadlines outstanding in the Bankruptcy Cases⁴ and prepared a detailed
2 report and recommendation to this Court regarding the further administration of the Bankruptcy
3 Cases; (12) conferred with the SEC regarding the Receiver's anticipated sales of personal and real
4 property out of receivership and prepared and filed a motion in this Court in support of those
5 efforts; (13) prepared and filed motions to compel when assets were unlawfully retained; and (14)
6 responded to investor inquiries as received. The Receiver continues to identify potential claims
7 that belong to the receivership estate and to gather information, issue subpoenas, and review books
8 and records and documents that are produced to identify additional sources of recovery. These
9 efforts will pave the way for additional recoveries to be obtained by the estate. Counsel continues
10 to coordinate their efforts to avoid duplication of services.

11 Given the significance of the work completed by the Receiver and counsel during the
12 Application Period, the Receiver and counsel Greenberg Traurig, Allen Matkins and Semenza
13 Kircher respectfully submits that the fees and expenses incurred during that period are reasonable
14 and appropriate and should be approved and paid, on an interim basis, in the amounts indicated
15 above. Moreover, as set forth in the motion to approve the employment of the professionals,
16 Greenberg Traurig agreed to discount their standard hourly rates by 15%, Allen Matkins agreed to
17 discount their standard hourly rates, in some cases in excess of 40%, and Semenza Kircher agreed
18 to a significant discount of up to 35% from its regular rates. The discounted rates are reflected in
19 the fees being sought in this Amended Application.

20 Consistent with the SEC's billing guidelines and the ordinary practice in federal
21 receiverships, the Receiver and his counsel request that the Court approve 100% of the fees and
22 expenses incurred during the Application Period but authorize payment, on an interim basis, of
23 only 80% of such fees and 100% of such expenses at this time.

24 ///

25 ///

26 ///

27 _____
28 ⁴ The "Bankruptcy Cases" collectively include the matters styled *In re J and J Consulting Servs., Inc.* (Case No. 22-10942-MKN) and *In re J and J Purchasing LLC* (Case No. 22-10943-MKN) (collectively, the "Bankruptcy Cases") pending in the United States Bankruptcy Court for the District of Nevada (the "Bankruptcy Court").

1 **II. LEGAL AUTHORITY**

2 “The power of a district court to impose a receivership ... derives from the inherent power
3 of a court of equity to fashion effective relief.”⁵ “The primary purpose of equity receiverships is
4 to promote orderly and efficient administration of the Receivership Estate by the district court for
5 the benefit of creditors.”⁶ “[T]he practice in administering an estate by a receiver ... must accord
6 with the historical practice in federal courts or with a local rule.”⁷

7 As the Ninth Circuit explained:

8 A district court’s power to supervise an equity receivership and to
9 determine the appropriate action to be taken in the administration of
10 the receivership is extremely broad. The district court has broad
11 powers and wide discretion to determine the appropriate relief in an
12 equity receivership. The basis for this broad deference to the district
13 court’s supervisory role in equity receiverships arises out of the fact
14 that most receiverships involve multiple parties and complex
15 transactions.⁸

16 Decisions regarding the timing and amount of an award of fees and expenses to the
17 Receiver and his or her professionals are committed to the sound discretion of the Court.⁹ In
18 determining the reasonableness of fees and expenses requested in this context, the Court should
19 consider the time records presented, the quality of the work performed, the complexity of the
20 problems faced, and the benefit of the services rendered to the Estate, along with the SEC’s
21 position on the request, which is entitled to “great weight.”¹⁰

22 **III. THE FEES AND COSTS BEING REQUESTED**

23 In evaluating the fees and costs of the Receiver and his professionals, it is important to
24 keep in mind that in the early stages of a complex receivership there are a number of steps that
25 must be taken to lay the groundwork for recovery and the evaluation of prospective creditor claims,
26 and any clawback or disgorgement litigation that the Receiver ultimately determines, in his

27 ⁵ *SEC v. Wencke*, 622 F.2d 1363, 1369 (9th Cir. 1980).

28 ⁶ *SEC v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986.)

⁷ Fed. R. Civ. P. 66.

⁸ *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.’”).

⁹ See *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev’d in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

¹⁰ *SEC v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973).

1 reasonable business judgment, is required to recover assets for the benefit of the Estate and its
2 creditors. All of the fees and expenses incurred during the Application Period will benefit the
3 receivership estate moving forward.

4 **a. The Receiver**

5 For this reporting period the Receiver and the AFS team incurred fees of **\$133,276.00** and
6 costs of **\$16,863.59**.

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

16 Pursuant to the Appointment Order, the Receiver and his team performed the following
17 duties in Q1 2022: obtained control over certain bank accounts and funds held by the J&J
18 Receivership Defendants; established new bank accounts for recovered funds; established a
19 website to allow investors to register to receive email notices of receivership filings and updates
20 (jjconsulting-receivership.com); obtained assets valued at over \$44 million including \$11.4 million
21 in cash, \$30 million in real property and \$2,800 in personal property; commenced the retrieval of
22 essential documents relating to the business and financial activities of the J&J Receivership
23 Defendants; conferred with the SEC regarding case concerns and filings; and responded to investor
24 inquiries as received. The Receiver continues to identify potential claims that belong to the
25 receivership estate and to gather information, issue subpoenas, and review books and records and
26 documents that are produced to identify additional sources of recovery. These efforts will pave the
27 way for additional recoveries to be obtained by the estate. Counsel continues to coordinate their
28 efforts to avoid duplication of services.

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

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Geoff Winkler	Receiver	140.8	\$340	\$47,872
John Hall	Accountant	51.4	\$310	\$15,934.00
Milana Barkhanoy	Dir. of Case Management	49.1	\$280	\$13,748.00
Josh McGraw	Case Manager	30.4	\$255	\$7,752.00
Amanda Deering	Case Manager	116.1	\$240	\$27,864.00
Sam Parker	Analyst	111.7	\$180	\$20,106.00
Total		515.8	\$265.40	\$133,276.00

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' 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 their work product. AFS does not bill for travel time in regulatory cases.

AFS's rates include a 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 their standard consulting rates.

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

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

<i>Category</i>	<i>Total Cost</i>
Airfare	\$5,473.45
Car Rental	\$761.05
Courier/Shipping/Freight	-
Fuel	-
Hotel	\$6,763.18
Meals	\$2,570.25
Internet/Online Fees	\$92.80
Miscellaneous	\$869.72
Office Supplies	-
Parking	\$123.00
Personal Car Mileage	-
Printing/Photocopying/Stationary	-
Taxi	\$210.14
Total	\$16,863.59

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

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

b. Greenberg Traurig

For this reporting period, Greenberg Traurig requests fees of **\$83,137.58**, and costs of **\$243.69**. Greenberg Traurig 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. During the Application

1 Period, Greenberg Traurig LLP performed services on multiple projects. Their work included,
 2 among other things: investigating, analyzing, and drafting necessary documents to ensure that
 3 Receivership property was properly preserved and where feasible transferred to the Receiver;
 4 liaising and negotiating with counsel for Defendants and Relief Defendants for turnover of assets;
 5 obtaining certified copies of documents needed for 754 filings; researching real property
 6 ownership records relating to Defendants; preparing and filing motions to compel when assets
 7 were unlawfully retained; identifying and monitoring litigation proceedings which may impact
 8 receivership case; assisting the Receiver in obtaining documents and records from multiple
 9 sources; and responding to investor inquiries as received.

10 Greenberg Traurig's fees for the Application Period for the category of "Asset Analysis
 11 and Recovery" are as follows:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Kara B. Hendricks	Shareholder	52.6	\$480.25	\$25,260.64
Jason Hicks	Shareholder	27.2	\$361.75	\$9,826.08
Kyle Ewing	Sr. Associate	29.80	\$340.00	10,132.00
Christian Spaulding	Associate	32.3	\$318.75	10,295.67
Cynthia Ney	Paralegal	34.4	\$250.75	\$8,497.60
Total		179.4	\$361.98	\$64,011.99¹¹

21 Work performed in this category related primarily to the Receiver's efforts to identify and
 22 recover assets from third parties which required attention and analysis of data provided from
 23 Defendants and Relief Defendants and property research, preparation of written communication
 24 to counsel for Defendants and Relief Defendants and multiple phone calls regarding the same.
 25 Additionally, it was necessary for Greenberg Traurig to file two separate motions when assets were
 26 not timely turned over to the Receiver.

27 _____
 28 ¹¹ This total represents a \$927.85 reduction from the prior application and the attached invoices to Exhibit 2 as
 duplicative entries were identified by counsel for the SEC and removed from the prior totals. The duplicative entries
 were for time billed by Cynthia Ney on June 15, 2022 and Jason Hicks on June 23, 2022 and are not being sought
 herein.

Greenberg Traurig also handled a number of case administration activities including the review of numerous filings and coordinating efforts to respond and follow-up to ensure the organization and efficiency of the Receivership team as a whole. Greenberg Traurig's fees for the Application Period for the category of "Case Administration" are as follows:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Kara B. Hendricks	Shareholder	16.6	\$480.25	\$7,972.23
Jason Hicks	Shareholder	2.1	\$361.75	\$758.64
Kyle Ewing	Sr. Associate	1.9	\$340.00	\$646.00
Christian Spaulding	Associate	8.4	\$318.75	\$2,677.51
Cynthia Ney	Paralegal	28.2	\$250.75	\$7,071.21
Total		57.2	\$334.36	\$19,125.59

Greenberg Traurig 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% and with the discounted rates identified above. Greenberg Traurig's invoices are included with the Declaration of Kara Hendricks attached as **Exhibit 2**.

c. Allen Matkins

For this reporting period, Allen Matkins requests fees of **\$114,700.00** and costs of **\$1,360.00**. Allen Matkins was retained by the Receiver in June 2022. The Receiver selected Allen Matkins as one of two firms serving as general receivership counsel due to the firm's decades-long experience and expertise in federal equity receivership matters, as well as in creditors' rights, litigation, and personal and real property disposition matters. Allen Matkins has served as counsel to federal equity receivers in dozens of cases, has represented a variety of constituents in hundreds of bankruptcy matters, and has significant substantive experience in related areas, such as securities, corporate, and real estate.

///

1 During the Application Period, Allen Matkins extensively assisted the Receiver in the
 2 performance of his duties under the Appointment Order, primarily by attending to critical
 3 Receivership Estate administration, asset recovery, bankruptcy, and pending litigation matters. In
 4 all, on account of its services rendered to the Receiver during the Application Period, Allen
 5 Matkins billed 229 hours and incurred \$114,700.50 in fees and \$1,360.43 in expenses across the
 6 following eight categories:

<i>Category</i>	<i>Hours</i>	<i>Fees</i>	<i>Expenses</i>
General & Administrative	0.0		\$52.63
General Receivership	56.8	\$28,538.50	\$1,307.80
Asset Recovery & Management	66.1	\$34,647.50	\$0.00
Investigation & Reporting	52.7	\$24,951.50	\$0.00
Investor Issues & Communications	7.00	\$3,115.00	\$0.00
Sale, Disposition & Transfer of Assets	24.6	\$13,257.00	\$0.00
Pending Litigation	16.9	\$7,520.50	\$0.00
Third Party Claims & Recoveries	4.9	\$2,670.50	\$0.00
Total	229.0	\$114,700.50	\$1,360.43

18
 19 Provided below are narrative summaries of the work performed under each of the
 20 categories and attached hereto as **Exhibit 3** is the Declaration of Joshua del Castillo along with
 21 Allen Matkins' invoices, containing the billing entries detailing the tasks performed by the firm's
 22 attorneys and paralegals during the Application Period.

23 Allen Matkins endeavored to staff each task efficiently, using a core team of attorneys,
 24 with specialized assistance as necessary. As the Court and interested parties may recall, Allen
 25 Matkins also agreed to a significant discount from its ordinary billing rates for this matter, as well
 26 as not to charge the Estate for any travel time associated with services provided to the Receiver.
 27 Accordingly, the fees identified below were billed at rates reflecting discounts of as much as 40%
 28 or more for Allen Matkins timekeepers, thereby resulting in a substantial savings for the Estate.

1 While Allen Matkins incurred no attorney time in connection with the general and
2 administrative work category during the Application Period, it did bill \$52.63 in expenses, in
3 connection with document duplication efforts.

4 During the Application period, Allen Matkins attorneys billed 56.8 hours to the "General
5 Receivership" work category, and incurred \$1,307.80 in expenses, largely in connection with
6 messenger and miscellaneous filing costs. Allen Matkins personnel billed the following time and
7 fees during the Application Period:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
David Zaro	Partner	1.3	\$545	\$708.50
Joshua del Castillo	Partner	35.6	\$545	\$19,402.00
Matthew Pham	Associate	11.5	\$445	\$5,117.50
Karine Akopchikyan	Associate	2.0	\$450	\$890.00
Bryce Ellis	Associate	1.9	\$445	\$845.50
John Kaup	Paralegal	4.5	\$350	\$1,575.00
Total		56.8	\$520.06	\$28,539.50

18 Work performed in this category related to the critical administrative tasks the Receiver
19 and his professionals needed to perform at the inception of the receivership, including reeving
20 relevant court and other public and non-public documents, ensuring the Receiver filed for
21 appropriate miscellaneous case numbers under 28 U.S.C. § 754 in any foreign jurisdictions where
22 it appeared receivership assets might be located, attending to the identification and analysis of
23 certain receivership assets, and, critically, work in connection with the Receiver's July 1, 2022
24 deadline to prepare and submit a written report and recommendation to this Court regarding the
25 administration of the Bankruptcy Cases.

26 During the Application period, Allen Matkins attorneys billed 66.1 hours to the "Asset
27 Recovery & Management" work category and incurred \$0.0 in expenses. Allen Matkins personnel
28 billed the following time and fees during the Application Period:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
David Zaro	Partner	17	\$545	\$9,265.00
Joshua del Castillo	Partner	37.8	\$545	\$20,601.00
Matthew Pham	Associate	5.4	\$445	\$2,403.00
Karine Akopchikyan	Associate	3.3	\$445	\$1,468.50
John Kaup	Paralegal	2.6	3.50	\$910.00
<i>Total</i>		<i>66.1</i>	<i>\$524.17</i>	<i>\$34,647.50</i>

Work performed in this category related almost entirely to the Receiver's efforts to recover from third parties' assets subject to the turnover provisions of the Appointment Order, which require all third parties in possession of assets of the Receivership Defendants to turn such assets over to the Receiver. During the Reporting Period, Allen Matkins' attorneys prepared template written turnover demands; issued turnover demands to third parties and conferred extensively with those parties after initial responses to the demands; assisted in the preparation of motions to compel turnover; reviewed prospective asset lists and conferred with the Receiver and co-counsel at Greenberg Traurig regarding which assets to pursue, in which order; undertook detailed analyses in connection with purported defenses to turnover raised by certain parties; and undertook focused analyses of specific assets or asset classes (and related documents) identified by the Receiver. During the Reporting Period, these efforts resulted in the recovery of more than \$7 million for the benefit of the Estate and its creditors.

During the Application period, Allen Matkins attorneys billed 52.7 hours to the "Investigation & Reporting" work category and incurred \$0.0 in expenses. Allen Matkins personnel billed the following time and fees during the Application Period:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
David Zaro	Partner	15.0	\$545	\$8,175.00
Matthew Pham	Associate	32.7	\$445	\$16,776.50
<i>Total</i>		<i>52.7</i>	<i>\$473.46</i>	<i>\$24,951.50</i>

Greenberg Traurig, LLP
 10845 Griffith Peak Drive, Suite 600
 Las Vegas, NV 89135
 (702) 792-3773
 (702) 792-9002 (fax)

1 Work performed in this category related almost entirely to the Receiver's analysis of, and
 2 recommendations to this Court concerning, the Bankruptcy Cases. Specifically, this Court ordered
 3 the Receiver to, within 30 days of his appointment, "report ... as to whether the Bankruptcy Cases
 4 should continue in Chapter 11, or be converted to Chapter 7, dismissed, or suspended during the
 5 course of the receivership." (See Appointment Order at ¶ 47.) In connection with this effort, Allen
 6 Matkins attorneys conferred extensively with the debtors' attorneys and others involved in the
 7 Bankruptcy Cases; reviewed bankruptcy filings (notably including the debtors' schedules and
 8 materials filed by the SEC in connection with the Bankruptcy Cases); performed extensive review
 9 of asset lists; conducted legal analysis involving the procedural posture and potential benefits and
 10 costs of continuing to administer the Bankruptcy Cases in the post-receivership period; and
 11 prepared the Receiver's detailed report and recommendation to this Court (see ECF No. 127).

12 Investor Issues & Communications.

13 During the Application period, Allen Matkins attorneys billed 7.0 hours to the "Investor
 14 Issues & Communications" work category and incurred \$0.0 in expenses. Allen Matkins personnel
 15 billed the following time and fees during the Application Period:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Matthew Pham	Associate	7.0	\$445	\$3,115.00
<i>Total</i>		<i>7.0</i>	<i>\$445.00</i>	<i>\$3,115.00</i>

16
 17
 18
 19
 20 Work performed in this category related almost entirely to communications with investors
 21 and other putative creditors of the Estate in connection with the Receiver's appointment, the
 22 pendency of the Bankruptcy Cases, and assets potentially available for recovery by the Receiver.
 23 Sale, Disposition & Transfer of Assets.

24 During the Application period, Allen Matkins attorneys billed 24.6 hours to the "Sale,
 25 Disposition & Transfer of Assets" work category, and incurred \$0.0 in expenses. Allen Matkins
 26 personnel billed the following time and fees during the Application Period:

27 ///
 28 ///

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
David Zaro	Partner	0.6	\$545	\$327.00
Joshua del Castillo	Partner	18.4	\$545	\$10,028.00
Michael Farrell	Partner	3.8	\$545	\$2,071.00
Edward Fates	Partner	0.3	\$545	\$163.50
Shauna Woods	Associate	1.5	\$445	\$667.50
<i>Total</i>		<i>24.6</i>	<i>\$538.90</i>	<i>\$13,257.00</i>

Work performed in this category related to the Receiver's pending and continuing efforts to sell personal and real property out of receivership, as authorized by the Appointment Order. Among other things, Allen Matkins attorneys performed legal analyses in connection with the Receiver's contemplated approaches to assets sales; conferred with the Receiver and co-counsel regarding asset sales; prepared draft motions in connection with the Receiver's asset sale proposals; and attended to numerous miscellaneous sale-related tasks, including the appraisal of a private aircraft, attending to title research, conferring with the SEC regarding the Receiver's anticipated sales plans, and preparing sale-related documents and agreements.

Pending Litigation.

During the Application period, Allen Matkins attorneys billed 16.9 hours to the "Pending Litigation" work category and incurred \$0.0 in expenses. Allen Matkins personnel billed the following time and fees during the Application Period:

<i>Name</i>	<i>Title</i>	<i>Hours</i>		<i>Rate/Hr.</i>	<i>Total</i>
Matthew Pham	Associate	16.9		\$445	\$7,520.50
<i>Total</i>		<i>16.9</i>		<i>\$445.00</i>	<i>\$7,520.50</i>

Work performed in this category related to the Bankruptcy Cases and litigation pending in connection with the Bankruptcy Cases. Allen Matkins personnel reviewed and analyzed critical bankruptcy pleadings; conferred with the U.S. Trustee's office; conferred with representatives of

1 the debtors' creditors' committee, the debtors' Chief Restructuring Officer, and the Receiver's state
 2 court predecessor; and attended to various procedural and administrative matters, including 341(a)
 3 and 2004 examination matters.

4 During the Application period, Allen Matkins attorneys billed 4.9 hours to the "Third Party
 5 Claims & Recoveries" work category and incurred \$0.0 in expenses. Allen Matkins personnel
 6 billed the following time and fees during the Application Period:

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
David Zaro	Partner	3.5	\$545	\$1,907.50
Michael Farrell	Partner	1.4	\$545	\$763.00
<i>Total</i>		<i>4.9</i>	<i>\$545.00</i>	<i>\$2,670.50</i>

7
 8
 9
 10
 11
 12 Work performed in this category related to actual and anticipated third party claims
 13 implicating or potentially implicating) the interests of the Estate, including at least one so-called
 14 class action brought be investor creditors of the Estate against one of the banks administering
 15 Estate accounts. Allen Matkins attorneys conferred with counsel for the class representatives;
 16 analyzed the viability of the claims in issue, and whether those claims were properly property of
 17 the Estate; and worked with the Receiver to develop prospective strategies in connection with these
 18 and other matters.

19 **d. Semenza Kircher**

20 For this reporting period, Semenza Kircher's requests fees in the amount of **\$4,756.50** and
 21 costs of **\$2,250.00**. Semenza Kircher was retained as special conflicts counsel on June 14, 2022.
 22 The Court approved the firm's retention on July 25, 2022. The Receiver selected Semenza Kircher
 23 as conflicts counsel due to their local presence and lack of potential conflicts with national finance
 24 or banking institutions. The firm also has experience in federal equity receivership matters and
 25 appears frequently before the Nevada Federal District Court in numerous commercial litigation
 26 matters.

27 ///

28 ///

Greenberg Traurig, LLP
 10845 Griffith Peak Drive, Suite 600
 Las Vegas, NV 89135
 (702) 792-3773
 (702) 792-9002 (fax)

1 During the Application Period, Semenza Kircher assisted the Receiver in the performance
 2 of his duties by handling litigation-related matters. These matters include assisting and finalizing
 3 the pro hac vice applications of the Allen Matkins attorneys, attending the June 21, 2022, omnibus
 4 hearing in the Bankruptcy Court (22-10942), conducting various legal research connected to the
 5 Receiver’s efforts to recover Receivership Assets, coordinating with the Court regarding local
 6 procedural requirements, and reviewing and filing briefs such as the Receiver’s Status Report.

7 Overall, on account of its services rendered to the Receiver during the Application Period,
 8 Semenza Kircher billed 21.7 hours and \$4,756.50 in fees.

<i>Name</i>	<i>Title</i>	<i>Hours</i>	<i>Rate/Hr.</i>	<i>Total</i>
Jarrold Rickard	Partner	7.0	\$375	\$2,625.00
Olivia Kelly	Paralegal	14.7	\$145	\$2,131.50
<i>Total</i>		<i>21.7</i>	<i>\$219.19</i>	<i>\$4,756.50</i>

9
 10
 11
 12
 13
 14 Attached hereto as **Exhibit 4** is the Declaration of Jarrold Rickard along with Semenza
 15 Kircher’s invoice containing the billing entries detailing the tasks performed by the firm’s
 16 attorneys and paralegals during the Application Period. Semenza Kircher endeavored to staff each
 17 task efficiently and, as the Court may recall, agreed to a discount of its ordinary billing rates for
 18 the duration of this matter. The Semenza Kircher Rickard fees are customary and regular and
 19 should be deemed reasonable given the work provided.

20 In connection with the services rendered to the Receiver during the Application Period,
 21 Semenza Kircher incurred \$2,250.00 in expenses. The schedule of these expenses is included on
 22 **Exhibit 4** hereto. These expenses relate exclusively to the pro hac vice expenses for the Allen
 23 Matkins attorneys.

24 ///
 25 ///
 26 ///
 27 ///
 28 ///

Greenberg Traurig, LLP
 10845 Griffith Peak Drive, Suite 600
 Las Vegas, NV 89135
 (702) 792-3773
 (702) 792-9002 (fax)

1 **IV. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND**
2 **SHOULD BE ALLOWED.**

3 The Receiver and his counsel respectfully submit that the fees and expenses incurred during
4 the Application Period were fair, reasonable, necessary, and significantly benefited the Estate.
5 Importantly, efforts were taken to avoid duplication of efforts and to undertake required tasks in
6 as efficient manner as possible, utilizing personnel best suited to the task consistent with the
7 complexity of the tasks required with the goal of providing high quality work that benefits the
8 receivership estate.

9 **a. Efforts to Avoid Duplication.**

10 During the Application Period, the Receiver and his professionals endeavored to avoid
11 duplication of efforts, and to undertake required tasks in as efficient a manner as possible, utilizing
12 personnel best suited to the task. Among other things, the Receiver and select representatives
13 among his professionals held frequent (later, weekly) videoconference meetings to identify
14 outstanding tasks, assign to each outstanding task a measure of urgency or importance, and
15 determine which of the Receiver’s professionals would be responsible for completing the task, and
16 when. As reflected in the invoices submitted in support of this Amended Application, and
17 particularly given that the Amended Application covers the very first month of the receivership –
18 when identifying and establishing authority and control over known receivership assets is most
19 critically important – many of the tasks undertaken by the Receiver and his professionals were
20 urgent. These ranged from ensuring prompt 28 U.S.C. 754 filings in other districts, to requesting
21 the turnover of funds and other assets falling within the ambit of the turnover provisions of the
22 Appointment Order, to attending to near-term reporting deadlines established by the Court, to
23 developing and proposing procedures for forthcoming efforts by the Receiver that would be critical
24 to a successful outcome for the estate. Many of these efforts required significant legal analysis
25 and drafting, and often required input from a variety of counsel, including in order to determine
26 which of the Receiver’s professionals were best suited to completing a given task. By way of
27 example, Allen Matkins took the lead on handling bankruptcy related matters while Greenberg
28 Traurig took the lead on working with defendants and their counsel to facilitate the turnover of

1 assets and filing related motions. This division of work has significantly benefitted the estate, as
2 reflected in the Court's prior favorable orders on the Receiver's bankruptcy report and other
3 petitions for relief, and in the progress made by the Receiver to-date in connection with the
4 identification and marshaling of valuable receivership assets.

5 Although, on occasion, the Receiver and his professionals were required to engage in
6 efforts that overlapped to a degree (again, particularly given the early stage of the receivership
7 case), they consistently endeavored to limit such overlap, and to ensure that each task was
8 undertaken by the appropriate, and smallest, group of professionals necessary and sufficient to
9 maximize the likelihood of a successful outcome. These efforts have continued beyond the
10 Reporting Period, and the Receiver continues to hold weekly videoconferences with key
11 professional personnel in order to maximize efficiency and reduce the costs to the estate. In
12 addition, after the submission of their initial invoices to the SEC, and in response to subsequent
13 SEC recommendations, the Receiver and his professionals have endeavored to be even more
14 specific in their time entries, so as to clarify when overlap on a given task was required, and which
15 attorneys worked on such tasks. This revised, even more specific approach to billing is expected
16 to result in even greater clarity in subsequent applications for payment of fees and reimbursement
17 of expenses.

18 **b. Complexity of Receivers Tasks and Quality of Work Performed.**

19 As referenced above, during the early stages of a receivership there are a number of moving
20 parts and numerous issues to address many on an expedited timeline. Here, due to the number of
21 defendants, the number of alleged victims of the purported Ponzi-scheme, and the dollar amount
22 at issue, there were inherent complexities the Receiver and his team faced in determining how to
23 proceed in the most expedient manner. The Receiver and his counsel made immediate efforts to
24 contact defendants to facilitate the turnover of available assets in an orderly fashion. Additionally,
25 financial institutions were contacted and advised of the orders entered by this Court effecting
26 monies they held. Efforts were also immediately taken to facilitate a mechanism to contact and
27 inform investors regarding the receivership process. All of these efforts were taken
28 contemporaneously, and required coordination among multiple attorneys, occasionally among

1 personnel from multiple law firms, to say nothing of coordination with the Receiver and his in-
2 house staff. This case is also unique in that, prior to the SEC initiating this action, related
3 proceedings were filed in Nevada State Court as well as the United States Bankruptcy Court. It
4 was necessary for the Receiver and his team to evaluate and understand the other proceedings in a
5 manner that would allow the Receiver to make recommendations to this Court regarding next steps.

6 The quality of the work performed by the Receiver and his team is further established in
7 the First Quarterly Report filed on August 1, 2022 (ECF No. 215), which details the substantial
8 activities of the Receiver including, but not limited to recovering \$11,411,246 in cash and
9 collecting assets consisting of real property, vehicles and other valuable assets during the
10 Application period with an estimated value of \$44,211,246 (inclusive of the \$11,411,246 in cash).
11 Additionally, information is set forth therein regarding work necessitated by the bankruptcy
12 proceedings and information obtained from investors and promoters that will provide a
13 springboard for additional efforts by the Receiver and his team to marshal valuable assets for the
14 benefit of the receivership estate. Put simply, at a time of the greatest complexity and the least
15 comprehensive knowledge of the underlying facts, critical players, or assets in issue, during the
16 first month of the receivership, the Receiver and his professionals successfully marshaled more
17 than \$11 million in cash, and another \$33 million in other assets for the benefit of the receivership
18 estate, in addition to developing a comprehensive understanding of the associated state court and
19 bankruptcy proceedings, preparing a report and recommendation to this Court regarding the
20 bankruptcy proceedings and related adversary matters, and satisfying countless case and
21 administration tasks expected to yield significant benefits as this matter proceeds. Accordingly,
22 the Receiver and his professionals respectfully submit that the work performed was of the highest
23 quality, and the resultant benefit to the estate substantial.

24 **c. Fair Value of Receiver's Time and Reasonableness of Expenses on**
25 **Receivership Estate.**

26 As set forth in the applications made to this court to facilitate the Receiver employing
27 counsel (ECF Nos. 90 and 108), and as referenced above, the attorneys working on this matter are
28 doing so at *heavily* discounted rates far below the market or "rack" rates charged in non-

1 receivership matters, notwithstanding the complexity of the present receivership case or the
2 amounts in controversy. In addition, as noted above, the Receiver and his professionals have
3 consistently endeavored to avoid duplication of efforts and to undertake required tasks in an
4 efficient manner. The Receiver and his internal team have also committed to significantly
5 discounted rates notwithstanding AFS's broad range of experience and expertise. Moreover, AFS
6 performs a substantial amount of work in-house, saving both time and money, including tasks
7 involving corporate accounting, forensic accounting, case administration, claims administration,
8 asset valuation, investor communications and internet technology. The significantly reduced rates
9 being charged in this matter, along with efforts to avoid duplication and streamline task
10 demonstrate the reasonableness of the fees requested.

11 When it comes to evaluating the burden of the expenses and the ability of the receivership
12 estate to reasonably bear the same, it is important to look at the case as a whole. In its Complaint
13 (as amended), the SEC has alleged causes of action arising from an alleged investment scheme,
14 whereby hundreds of millions of dollars in investments were successfully solicited based on claims
15 that funds invested would be backed by settlements to be paid out in litigation across the country.
16 (ECF No. 118). In addition, the SEC has alleged that investor funds were diverted by certain
17 defendants to purchase luxury homes, a private aircraft, and multiple luxury automobiles, among
18 other things. (Id.) The Receiver's ability to obtain assets valued at over \$44 million including
19 \$11.4 million in cash and \$30 million in real property in the first months, is not insignificant and
20 is an important consideration when evaluating the fees requested and their potential impact on the
21 estate. As compared to the value of the assets recovered during the Application Period, the
22 Receiver's and his professionals' fees in their entirety (to say nothing of the fact that they have
23 requested payment of fees at an interim rate of only 80% of actual fees incurred) constitute less
24 than 1% of the value of the estate at the end of the Application period. Moreover, the Receiver
25 and his team continue to recover assets and are in the process of selling the same with proceeds
26 going directly to the Receiver for the benefit of the estate to achieve the most equitable outcome
27 possible for all stakeholders. Accordingly, approval of the fees requested is appropriate.

28 ///

d. Communication with SEC Counsel

The fees requested by the Receiver and his professionals were reviewed and will continue to be reviewed by the SEC staff prior to their submittal to this Court. As set forth in the Appointment Order (ECF No 88), at least 30 days prior to filing each Quarterly Fee Application with the Court, the Receiver and his team provide SEC Counsel a complete copy of the proposed fee application and relevant billing information. The SEC staff then reviews 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 staff and have implemented internal procedures to maximize the clarity of their time entries (which will likely minimize duplication concerns). In order to allow the SEC additional time to review and comment regarding billing invoices, the Receiver and counsel referenced herein have now agreed to provide the SEC billing statements on a monthly basis. Doing so will provide additional time to address any potential concerns regarding the time entries prior to the fee submittals.

With respect to this application, relevant information was provided to SEC counsel, which identified a small number of duplicate time entries (which have been removed) and raised questions about several other entries. SEC counsel also provided guidance on complying with Billing Instructions and how to improve time entries going forward.¹² The Receiver and his professionals have implemented a protocol to incorporate the guidance provided by the SEC into time entries going forward. For purposes of the current application, SEC counsel has informed the Receiver that the SEC does not oppose the requested allowance and payment of fees and costs, on an interim basis.

///

///

///

¹² The guidance provided by the SEC staff, which is intended to assist the staff in assessing the reasonableness of fees incurred, fell primarily into five categories: 1) providing more specific billing entries for conference and meetings including the name of individuals participating; 2) providing more specific information regarding email and phone communication including the method utilized, i.e. phone, email, Zoom and include the names of the parties involved; 3) generally providing more specificity and detail and avoid vague descriptions; 4) avoiding block billing and when an entry involves two or more tasks that exceed 1.0 hour in the aggregate, identify the time spent on each task in parentheses (following the task) in the billing narrative; and 5) being mindful of duplication and whether it is appropriate to bill all attendees at group meetings/calls.

1 **V. CONCLUSION**

2 Based on the foregoing, the Receiver and his counsel request that the Court approve the
3 fees and expenses as noted herein, and also authorize the payment of those fees and expenses on a
4 percentage, interim basis. Specifically, the Receiver and his counsel request entry of an order:¹³

5 1. Granting this Amended Application in its entirety;

6 2. Approving the Receiver’s fees and expenses incurred during the Application
7 Period, in the respective amounts of \$133,276.00 and costs of \$16,863.59, on an interim basis;

8 3. Authorizing payment to the Receiver on an interim basis, 80% of the approved fees
9 incurred during the Application Period, and 100% of its approved expenses incurred during the
10 Application Period, in the amount of \$16,863.59, from the funds of the Receivership Estate;

11 4. Approving Greenberg Traurig’s fees and expenses incurred during the Application
12 Period, in the respective amounts of \$83,137.58 and costs of \$243.69, on an interim basis;

13 5. Authorizing the Receiver to pay Greenberg Traurig, on an interim basis, 80% of its
14 approved fees incurred during the Application Period, and 100% of its approved expenses incurred
15 during the Application Period, in the amount of \$243.69, from the funds of the Receivership Estate;

16 6. Approving Allen Matkins’ fees and expenses incurred during the Application
17 Period, in the respective amounts of \$114,700.00 and costs of \$1,360.00, on an interim basis;

18 7. Authorizing the Receiver to pay Allen Matkins, on an interim basis, 80% of its
19 approved fees incurred during the Application Period, and 100% of its approved expenses incurred
20 during the Application Period, in the amount of \$1,360.00, from the funds of the Receivership
21 Estate;

22 8. Approving Semenza Kircher’s fees and expenses incurred during the Application
23 Period, in the respective amounts of \$4,756.50 and costs of \$2,250.00, on an interim basis;

24 9. Authorizing the Receiver to pay Semenza Kircher, on an interim basis, 80% of its
25 approved fees incurred during the Application Period, and 100% of its approved expenses incurred
26 during the Application Period, in the amount of \$2,250.00, from the funds of the Receivership
27 Estate; and

28 _____
¹³ The form of the proposed order is attached as **Exhibit 5**.

1 10. Granting such other and further relief as the Court deems just and appropriate.

2 DATED this 14th day of September 2022.

3 **GREENBERG TRAUIG, LLP**

4 By: /s/ Kara B. Hendricks

5 KARA B. HENDRICKS, Bar No. 07743

6 hendricksk@gtlaw.com

7 JASON K. HICKS, Bar No. 13149

8 hicksja@gtlaw.com

9 KYLE A. EWING, Bar No. 014051

10 ewingk@gtlaw.com

11 10845 Griffith Peak Drive, Suite 600

12 Las Vegas, Nevada 89135

13 JARROD L. RICKARD, Bar No. 10203

14 jlr@skrlawyers.com

15 KATIE L. CANNATA, Bar No. 14848

16 klc@skrlawyers.com

17 **SEMENZA KIRCHER RICKARD**

18 DAVID R. ZARO*

19 dzaro@allenmatkins.com

20 JOSHUA A. del CASTILLO*

21 jdelcastillo@allenmatkins.com

22 MATTHEW D. PHAM*

23 mpham@allenmatkins.com

24 *admitted pro hac vice

25 **ALLEN MATKINS LECK GAMBLE**

26 **MALLORY & NATSIS LLP**

27 *Attorneys for Receiver Geoff Winkler*

28
Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
(702) 792-3773
(702) 792-9002 (fax)

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 14th day of September 2022, a true and correct copy of the foregoing **THE RECEIVER’S AMENDED FIRST APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES AND COSTS FOR THE PERIOD JUNE 3, 2022 THROUGH JUNE 30, 2022** was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties registered to this case by operation of the Court’s CM/ECF system, and parties may access this filing through the Court’s CM/ECF system.

/s/ Pamela January

An employee of GREENBERG TRAUIG, LLP

GREENBERG TRAUIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LIST OF EXHIBITS

- Exhibit 1** Declaration of Geoff Winkler In Support of Amended First Application of Receiver and Receiver's Professionals for Allowance and Payment of Fees and Costs for The Period From June 3, 2022 Through June 30, 2022.
- Exhibit 2** Declaration of Kara B. Hendricks In Support of Amended First Application of Receiver and Receiver's Professionals for Allowance and Payment of Fees and Costs for The Period From June 3, 2022 Through June 30, 2022.
- Exhibit 3** Declaration of Joshua A. Del Castillo In Support of Amended First Application of Receiver and Receiver's Professionals for Allowance and Payment of Fees and Costs for The Period From June 3, 2022 Through June 30, 2022.
- Exhibit 4** Declaration of Jarrod L. Rickard In Support of Amended First Application of Receiver and Receiver's Professionals for Allowance and Payment of Fees and Costs for The Period From June 3, 2022 Through June 30, 2022.
- Exhibit 5** [Proposed] Order Approving Amended First Application of Receiver and Receiver's Professionals for Allowance and Payment of Fees and Costs for The Period From June 3, 2022 Through June 30, 2022.

GREENBERG TRAUERIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “1”

**DECLARATION OF GEOFF WINKLER IN SUPPORT OF
AMENDED FIRST APPLICATION OF RECEIVER AND
RECEIVER'S PROFESSIONALS FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS FOR THE PERIOD
FROM JUNE 3, 2022 THROUGH JUNE 30, 2022
Pages 1-25**

UNITED STATES DISTRICT COURT

Case No. 2:22-cv-00612-CDS-EJY

EXHIBIT “1”

**DECLARATION OF GEOFF WINKLER IN SUPPORT OF
AMENDED FIRST APPLICATION OF RECEIVER AND
RECEIVER'S PROFESSIONALS FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS FOR THE PERIOD
FROM JUNE 3, 2022 THROUGH JUNE 30, 2022
Pages 1-25**

GREENBERG TRAURIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

Attorneys for Receiver, Geoff Winkler

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
**ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY, *et al.*,

Defendants,

THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

CASE NO. 2:22-cv-00612-CDS-EJY

**DECLARATION OF GEOFF
WINKLER IN SUPPORT OF
AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S
PROFESSIONALS FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3,
2022 THROUGH JUNE 30, 2022**

I, Geoff Winkler, declare as follows:

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

GREENBERG TRAUIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. I am competent to testify to the matters presented in this declaration, and I submit this declaration in support of my amended application for approval of the fees and costs in connection with the above captioned matter. This declaration is based on my personal knowledge, except where made on information and belief, and as to those matters, I believe them to be true.

3. On June 3, 2022, the Court appointed me as the permanent receiver of The J&J Receivership Defendants. This fee application covers the period from June 3, 2022 through June 30, 2022 (the “Application Period”).

4. Because I am not a licensed attorney in Nevada and AFS does not have in-house counsel, and due to the scope of service needed during the Application Period, I sought approval to employ professionals to assist me in fulfilling my duties as the Receiver. This included requests to retain Greenberg Traurig LLP (“Greenberg Traurig”), Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”), as counsel (ECF 90) and the law firm of Semenza Kircher Rickard (“Semenza Kircher”) as conflicts counsel (ECF 108).

5. Pursuant to the Appointment Order (ECF 88), my team at AFS performed the following duties: obtained control over certain bank accounts and funds held by the J&J Receivership Defendants; established new bank accounts for recovered funds; established a website to allow investors to register to receive email notices of receivership filings and updates (jjconsulting-receivership.com); obtained assets valued at over \$44 million including \$11.4 million in cash, \$30 million in real property and \$2,800 in personal property; commenced the retrieval of essential documents relating to the business and financial activities of the J&J Receivership Defendants; conferred with the SEC regarding case concerns and filings; and responded to investor inquiries as received.

6. AFS’ 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 their work product. AFS does not bill for travel time in regulatory cases.

1 7. AFS's rates include a discount off its already discounted hourly rates for
2 government matters and will not increase for the pendency of the case. Both the standard
3 regulatory rate and the discounted regulatory rate reflect a significant discount off their standard
4 consulting rates.

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

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

13 10. The Standardized Fund Accounting Report, AFS's invoices, and its billing entries
14 are attached hereto as **Exhibit A**.

15 11. I respectfully submit that the fees and expenses incurred during the Application
16 Period were fair, reasonable, necessary, and significantly benefited the Estate and request the Court
17 approve the fees and costs reflected in the invoices and approve payment in the amounts reflected
18 in the Application.

19 12. Additionally, I request the ability to pay the fees and costs for the retained
20 professionals as set forth in the Motion.

21 13. I hereby certify that I have read the Amended First Application of Receiver and
22 Receiver's Professional for Allowance and Payment of Fees and Costs for the Period from June 3,
23 2022 through June 30, 2022.

24 14. To the best of my knowledge, information and belief formed after reasonable
25 inquiry, the Application and all fees and expenses therein are true and accurate and comply with
26 the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and
27 Exchange Commission.
28

GREENBERG TRAURIG,
LLP
10845 Griffith Peak

1 15. All fees contained in the Amended Application are based on the rates listed in
2 AFS's fee schedule, subject to increases disclosed to the SEC and approved by the Court prior to
3 any such increase. All fees contained in the Application are reasonable, necessary and
4 commensurate with the skill and experience required for the activity performed and are subject to
5 Court approval.

6 16. AFS has not included in the amount for which reimbursement is sought the
7 amortization of the cost of any investment, equipment, or capital outlay (except to the extent that
8 any such amortization is included within the permitted allowable amounts set forth herein for
9 photocopies and facsimile transmission).

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

17 18. In regard to the fees requested by my counsel, efforts were taken to avoid
18 duplication of efforts and to undertake required tasks in as efficient manner as possible, utilizing
19 personnel best suited to the task consistent with the complexity of the tasks required with the goal
20 of providing high quality work that benefits the receivership estate.

21 19. I am sensitive to the feedback received from the SEC and this Court and have
22 implemented internal procedures to maximize the clarity of time entries moving forward.

23 20. I will continue to carefully oversee the professionals and others to avoid duplication
24 of work and to be sure that my team provides complete and meaningful entries etc. To accomplish
25 the same, I review invoices from counsel on a monthly basis and request revisions as necessary
26 prior to submitting the same to the SEC for review and consideration. In order to allow the SEC
27 additional time to review and comment regarding billing invoices, AFS and my counsel have
28 agreed to provide the SEC billing statements on a monthly basis and not just 30 days prior to the

1 filing of each Quarterly Statement as set for the Appointment Order. Doing so will provide
2 additional time to address any potential concerns regarding the time entries prior to the fee
3 submittals.

4 21. With respect to the fees requested as part of the Amended First Application, a copy
5 of the Application and the billing statements were provided to the SEC and the guidance provided
6 by the SEC has been incorporated into the Amended Application and will be incorporated going
7 forward. Additionally, based on communication with the SEC, the bill for AFS was reduced by
8 \$3,431.50 from the amount requested in the original application.

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

11 Executed on September 14, 2022.

12 /s/ Geoff Winkler _____
13 Geoff Winkler

14 GREENBERG TRAURIG,
15 LLP
16 10845 Griffith Peak

17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

Standardized Fund Accounting Report for SEC v. JJ Consulting Services, Inc. et al.
Reporting Period from 06/03/2022 to 06/30/2022

FUND ACCOUNTING (See instructions)				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 06/03/2022):	-		
	Increases in Fund Balance:			
Line 2	Business Income	118,677.30		
Line 3	Cash and Securities (in transit)	5,552,463.05		
Line 4	Interest/Dividend Income	-		
Line 5	Business Asset Liquidation	-		
Line 6	Personal Asset Liquidation	1,927,801.15		
Line 7	Third-Party Litigation Income	-		
Line 8	Miscellaneous - Other (Restricted: Beasley IOLTA Account)	3,812,304.74		
	Total Funds Available (Lines 1 - 8):		11,411,246.24	11,411,246.24
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	-		
Line 10b	Business Asset Expenses	-		
Line 10c	Personal Asset Expenses	(12,440.36)		
Line 10d	Investment Expenses	-		
Line 10e	Third-Party Litigation Expenses	-		
	1. Attorney Fees	-		
	2. Litigation Expenses	-		
	Total Disbursements for Receivership Operations		(12,440.36)	
Line 10f	Tax Administrator Fees and Bonds		-	
Line 10g	Federal and State Tax Payments		-	
	Total Disbursements for Receivership Operations			(12,440.36)
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):			(12,440.36)
Line 13	Ending Balance (As of 06/30/2022):			11,398,805.88
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		11,398,805.88	
Line 14b	Investments		-	
Line 14c	Other Assets or Uncleared Funds		-	
	Total Ending Balance of Fund - Net Assets			11,398,805.88

Standardized Fund Accounting Report for SEC v. JJ Consulting Services, Inc. et al.
Reporting Period from 06/03/2022 to 06/30/2022

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

Receiver: **Geoff Winkler**

By: 

Geoff Winkler
(printed name)

Chief Executive Officer
American Fiduciary Services LLC
Receiver, J&J Consulting Services, Inc. et al.

Date: July 30, 2022

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Amanda Deering	Review and prepare operating agreement	6/3/2022	0.6	240.00	144.00	Legal - Case Administration
Amanda Deering	Listing out Motion deliverables and notes in summary for next steps	6/3/2022	1.0	240.00	240.00	Legal - Case Administration
Geoff Winkler	Review pleadings, call with counsel, call with interested parties, prepare for case	6/3/2022	5.3	340.00	1,802.00	Legal - Case Administration
Josh McGraw	Reviewing pleadings and court orders	6/3/2022	1.5	255.00	382.50	Legal - Case Administration
Amanda Deering	Review of new case checklist for J+J planning	6/5/2022	1.0	240.00	240.00	Legal - Case Administration
Amanda Deering	Call with counsel discussing case and next steps	6/5/2022	0.8	240.00	192.00	Legal - Case Administration
Amanda Deering	Reviewing Court Documents, Reports, Asset Spreadsheets and updating the new case checklist	6/5/2022	2.0	240.00	480.00	Legal - Case Administration
Geoff Winkler	Review pleadings	6/5/2022	1.8	340.00	612.00	Legal - Case Administration
Geoff Winkler	Visit defendants at the homes	6/5/2022	2.1	340.00	714.00	Legal - Case Administration
Geoff Winkler	Review pleadings, organization information, prepare for onsite meetings	6/5/2022	3.6	340.00	1,224.00	Legal - Case Administration
Geoff Winkler	Email to team re items for the upcoming meeting with counsel	6/5/2022	0.1	340.00	34.00	Legal - Case Administration
John Hall	Preparation for (.5) and (.8) meeting with Receiver team and follow up discussion with GBW (.5)	6/5/2022	1.8	310.00	558.00	Legal - Case Administration
John Hall	Review and analysis of documents and reports	6/5/2022	2.5	310.00	775.00	Legal - Case Administration
Josh McGraw	Meeting with team and counsel	6/5/2022	0.8	255.00	204.00	Legal - Case Administration
Milana Barkhanoy	Call with counsel discussing case and next steps	6/5/2022	0.8	280.00	224.00	Legal - Case Administration
Milana Barkhanoy	Email from GBW re items for the upcoming meeting with counsel	6/5/2022	0.1	280.00	28.00	Legal - Case Administration
Sam Parker	Review real property assets	6/5/2022	1.9	180.00	342.00	Legal - Case Administration
Sam Parker	Call with counsel discussing case and next steps	6/5/2022	0.8	180.00	144.00	Legal - Case Administration
Sam Parker	Reading SEC Complaint and Court Order to approve Receiver	6/5/2022	0.5	180.00	90.00	Legal - Case Administration
Amanda Deering	Setting up phone, email and website system	6/6/2022	3.0	240.00	720.00	Legal - Case Administration
Amanda Deering	Review case meeting with GBW and full team.	6/6/2022	1.0	240.00	240.00	Legal - Case Administration
Amanda Deering	Meetings with State receiver, FBI, counsel and others	6/6/2022	3.0	240.00	720.00	Legal - Case Administration
Amanda Deering	Chat with SBP re tasks	6/6/2022	0.2	240.00	48.00	Legal - Case Administration
Geoff Winkler	Calls with counsel, parties, third parties	6/6/2022	6.9	340.00	2,346.00	Legal - Case Administration
Geoff Winkler	Team meeting to discuss outstanding tasks	6/6/2022	0.3	340.00	102.00	Legal - Case Administration
John Hall	Call with KA JJ Atty, GBW, JDC, fu conversation re: same	6/6/2022	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review materials on Dowdy v WF case, discuss with GBW	6/6/2022	1.3	310.00	403.00	Legal - Case Administration
John Hall	Review BK schedules, discuss with staff, review and digitize defense counsel lists.	6/6/2022	1.8	310.00	558.00	Legal - Case Administration
John Hall	Meeting with GC GBW	6/6/2022	1.0	310.00	310.00	Legal - Case Administration
John Hall	Review case meeting with GBW and full team.	6/6/2022	1.0	310.00	310.00	Legal - Case Administration
John Hall	Team meeting to discuss casework.	6/6/2022	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/6/2022	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/6/2022	1.0	255.00	255.00	Legal - Case Administration
Milana Barkhanoy	Chat with AMD re tasks	6/6/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	6/6/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Review items for upcoming meeting with Receiver's team	6/6/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Quick check in with JBH re items for upcoming meeting with Receiver's team	6/6/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Call with counsel re tasks and next steps	6/6/2022	0.8	280.00	224.00	Legal - Case Administration
Sam Parker	Review case meeting with GBW and full team.	6/6/2022	1.0	180.00	180.00	Legal - Case Administration
Sam Parker	Meetings with State receiver, counsel and others	6/6/2022	3.0	180.00	540.00	Legal - Case Administration
Sam Parker	Reviewing case details	6/6/2022	1.0	180.00	180.00	Legal - Case Administration
Amanda Deering	Assets review, data collection, data entry and communication for Beasley case	6/7/2022	6.3	240.00	1,512.00	Legal - Asset Analysis and Recovery
Sam Parker	Call with CB legal counsel regarding account transfer to receiver	6/7/2022	0.5	180.00	90.00	Legal - Asset Analysis and Recovery
Sam Parker	Reviewing defendants' reports to assess real property information	6/7/2022	2.8	180.00	504.00	Legal - Asset Analysis and Recovery
Amanda Deering	Review case meeting with GBW and full team.	6/7/2022	0.6	240.00	144.00	Legal - Case Administration
Amanda Deering	Organization and Relationships Chart	6/7/2022	1.0	240.00	240.00	Legal - Case Administration
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/7/2022	8.6	340.00	2,924.00	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/7/2022	0.6	255.00	153.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Call with counsel re tasks and next steps	6/7/2022	0.6	280.00	168.00	Legal - Case Administration
Milana Barkhanoy	Review items for upcoming meeting with Receiver's team	6/7/2022	0.1	280.00	28.00	Legal - Case Administration
Sam Parker	Review case meeting with GBW and full team.	6/7/2022	0.6	180.00	108.00	Legal - Case Administration
Sam Parker	Taking notes for GW meeting with Defendant Attorney regarding asset turnover	6/7/2022	1.0	180.00	180.00	Legal - Case Administration
Sam Parker	Reviewing bankruptcy filing to identify creditors	6/7/2022	1.0	180.00	180.00	Legal - Case Administration
John Hall	Review account list and discuss with staff next steps.	6/8/2022	0.4	310.00	124.00	Financial - Accounting/Auditing
Amanda Deering	Discussion around Assets and next steps	6/8/2022	0.3	240.00	72.00	Legal - Asset Analysis and Recovery
Josh McGraw	Discussion with MBB around assets and next steps	6/8/2022	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Sam Parker	View defendant property that is to be recovered by the receiver	6/8/2022	4.8	180.00	864.00	Legal - Asset Analysis and Recovery
Sam Parker	Creating spreadsheet with defendant Real Property info	6/8/2022	2.0	180.00	360.00	Legal - Asset Analysis and Recovery
Amanda Deering	Conversation with JBH regarding Beasley case	6/8/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Discussion with AMD and JPM regarding assets and court documents	6/8/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Setting Up claimant intake spreadsheet and info	6/8/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Review case meeting with GBW and full team.	6/8/2022	1.0	240.00	240.00	Legal - Case Administration
	Communication with JPM, MBB & AMD regarding claimant intake information and inquiries	6/8/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Conversation with AMD and JPM regarding J+J case	6/8/2022	0.4	240.00	96.00	Legal - Case Administration
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/8/2022	8.4	340.00	2,856.00	Legal - Case Administration
Geoff Winkler	Chat with team re case tasks	6/8/2022	0.1	340.00	34.00	Legal - Case Administration
	Review memo from counsel and background information on BK 341a issue and coordination with BK counsel.	6/8/2022	0.5	310.00	155.00	Legal - Case Administration
John Hall	Review warehouse issues and discuss with GT and BH team and GBW	6/8/2022	0.5	310.00	155.00	Legal - Case Administration
John Hall	Review and discuss WF complaint with GBW.	6/8/2022	0.3	310.00	93.00	Legal - Case Administration
Josh McGraw	Reviewing WF complaint and asset documents	6/8/2022	1.1	255.00	280.50	Legal - Case Administration
Josh McGraw	Call with MBB to discuss court documents and case information	6/8/2022	0.3	255.00	76.50	Legal - Case Administration
	Communication with MBB & AMD regarding claimant intake information and inquiries	6/8/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing relationship information and court order	6/8/2022	1.3	255.00	331.50	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/8/2022	1.0	255.00	255.00	Legal - Case Administration
	Conversation with AMD regarding asset preparation, receiver's checklist and next steps	6/8/2022	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Discussion with AMD and JPM regarding assets and court documents	6/8/2022	0.2	255.00	51.00	Legal - Case Administration
Milana Barkhanoy	Review items for upcoming meeting with Receiver's team	6/8/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Call with JPM re next steps	6/8/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Chat with GBW re case tasks	6/8/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Updating billing software with rates	6/8/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Reviewing documents	6/8/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Case communication and claim intake information	6/8/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Reviewing pleading documents	6/8/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Call with counsel re case and next steps	6/8/2022	1.0	280.00	280.00	Legal - Case Administration
Milana Barkhanoy	Email communication from JBH; reviewing document with a list of bank accounts	6/8/2022	0.2	280.00	56.00	Legal - Case Administration
Sam Parker	Call with counsel re case and next steps	6/8/2022	1.0	180.00	180.00	Legal - Case Administration
	Create asset spreadsheet for next location, reviewing all other documentation for further information	6/9/2022	1.0	240.00	240.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication with JBH and AMD re next steps in assets recovery	6/9/2022	0.1	240.00	24.00	Legal - Asset Analysis and Recovery
John Hall	Communication with JBH and AMD re next steps in assets recovery	6/9/2022	0.1	310.00	31.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication with JBH and AMD re next steps in assets recovery	6/9/2022	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication with JBH re next tasks in assets recovery	6/9/2022	0.3	280.00	84.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Reviewing asset lists and detail	6/9/2022	0.4	280.00	112.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Communication from JBH re vehicles and next steps	6/9/2022	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Email to GBW re vehicles and next steps	6/9/2022	0.1	280.00	28.00	Legal - Asset Analysis and Recovery

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Communication from GBW re vehicles and next steps	6/9/2022	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Sam Parker	Reviewing vehicle VINs that are to be recovered on 6.6.2022	6/9/2022	0.5	180.00	90.00	Legal - Asset Analysis and Recovery
Sam Parker	Transporting vehicles from Summerlin to warehouse in North Las Vegas	6/9/2022	4.0	180.00	720.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting with counsel discussing case and next steps	6/9/2022	0.5	240.00	120.00	Legal - Case Administration
Amanda Deering	Communication with AMD, MBB re assets recovery	6/9/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	J+J discussion around new case checklist with JPM and AMD	6/9/2022	0.2	240.00	48.00	Legal - Case Administration
Geoff Winkler	Emails to team re vehicles and next steps	6/9/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/9/2022	8.6	340.00	2,924.00	Legal - Case Administration
John Hall	Team meeting to discuss ongoing work and deliverables	6/9/2022	1.0	310.00	310.00	Legal - Case Administration
Josh McGraw	Discussion around new case checklist with JPM and AMD	6/9/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing asset list, complaint and appointment order	6/9/2022	1.8	255.00	459.00	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/9/2022	0.7	255.00	178.50	Legal - Case Administration
Milana Barkhanoy	Chat with JBH re assets recovery	6/9/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Communication with AMD re assets recovery	6/9/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Call with JBH re assets recovery and next steps	6/9/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Review items for upcoming meeting with Receiver's team	6/9/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Meeting with counsel discussing case and next steps	6/9/2022	0.5	280.00	140.00	Legal - Case Administration
Sam Parker	Meeting with counsel discussing case and next steps	6/9/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Case discussion and document pickup from Greenberg Traurig with GBW	6/9/2022	0.8	180.00	144.00	Legal - Case Administration
Sam Parker	Reviewing case notes	6/9/2022	1.0	180.00	180.00	Legal - Case Administration
Sam Parker	Calls with property counsel to locate storage for vehicles	6/9/2022	0.3	180.00	54.00	Legal - Case Administration
Amanda Deering	Review sec doc for additional assets and add to spreadsheet	6/10/2022	0.5	240.00	120.00	Legal - Asset Analysis and Recovery
Josh McGraw	Calls and communication with SBP regarding assets	6/10/2022	0.8	255.00	204.00	Legal - Asset Analysis and Recovery
Josh McGraw	Verifying asset list with ownership information and sales information	6/10/2022	3.5	255.00	892.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Reviewing asset lists and detail	6/10/2022	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Sam Parker	Recovering Spartan K2 RV with GBW	6/10/2022	1.5	180.00	270.00	Legal - Asset Analysis and Recovery
Sam Parker	Asset discovery - Real property located and confirmed using County Assessor database	6/10/2022	3.0	180.00	540.00	Legal - Asset Analysis and Recovery
Sam Parker	Calls and communication with JPM regarding assets	6/10/2022	0.8	180.00	144.00	Legal - Asset Analysis and Recovery
Amanda Deering	Discussing Email Processing for case	6/10/2022	0.6	240.00	144.00	Legal - Case Administration
Amanda Deering	Communication re investor communication for case	6/10/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Email signature set up	6/10/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Communication with team re: next steps	6/10/2022	0.5	240.00	120.00	Legal - Case Administration
Amanda Deering	Reviewing and Organizing case documentation	6/10/2022	2.0	240.00	480.00	Legal - Case Administration
Amanda Deering	Meeting with counsel discussing case and next steps	6/10/2022	0.7	240.00	168.00	Legal - Case Administration
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/10/2022	7.7	340.00	2,618.00	Legal - Case Administration
John Hall	Team meeting to discuss ongoing case activities.	6/10/2022	0.7	310.00	217.00	Legal - Case Administration
John Hall	Review schedules and verification matrices on bankruptcy creditors.	6/10/2022	0.5	310.00	155.00	Legal - Case Administration
Josh McGraw	Crafting email communication for claimants	6/10/2022	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with AMD regarding claimant communication and website	6/10/2022	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/10/2022	0.7	255.00	178.50	Legal - Case Administration
Milana Barkhanoy	Team discussion of claimant communication strategy	6/10/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Meeting with counsel discussing case and next steps	6/10/2022	0.7	280.00	196.00	Legal - Case Administration
Milana Barkhanoy	Reviewing claim detail	6/10/2022	0.1	280.00	28.00	Legal - Case Administration
Sam Parker	Call with Wells Fargo Attorney with GBW	6/10/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Meeting with counsel discussing case and next steps	6/10/2022	0.7	180.00	126.00	Legal - Case Administration
Sam Parker	Creating spreadsheet with list of creditors from bankruptcy - possible list of investors amongst claimants	6/10/2022	1.0	180.00	180.00	Legal - Case Administration
Amanda Deering	Call with investor re: involvement and next steps	6/10/2022	0.6	240.00	144.00	Legal - Claims Administration and Objections
Amanda Deering	Call with second investor re: involvement and next steps	6/10/2022	0.3	240.00	72.00	Legal - Claims Administration and Objections
Amanda Deering	Call with third investor re: involvement and next steps	6/10/2022	0.3	240.00	72.00	Legal - Claims Administration and Objections

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

<u>Personnel</u>	<u>Item / Description</u>	<u>Date</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Activity Category</u>
Amanda Deering	Call with investor re: involvement and next steps	6/10/2022	0.5	240.00	120.00	Legal - Claims Administration and Objections
Milana Barkhanoy	Communication from AMD re new assets	6/13/2022	0.1	280.00	28.00	Legal - Asset Analysis and Recovery
Sam Parker	Viewing jet and charter statements	6/13/2022	1.5	180.00	270.00	Legal - Asset Analysis and Recovery
Sam Parker	Asset Spreadsheet - Real Property	6/13/2022	3.0	180.00	540.00	Legal - Asset Analysis and Recovery
	Setting up link on website to case, reviewing case checklist, searching for information on defendant entities for mail transfer, meeting with GBW, meeting with counsel, email review, meeting re: jet, updating asset list, creating asset list for Utah location specific	6/13/2022	8.0	240.00	1,920.00	Legal - Case Administration
Amanda Deering	Calls and emails with counsel, parties, third parties, manage assets	6/13/2022	8.2	340.00	2,788.00	Legal - Case Administration
Geoff Winkler	Team meeting with staff and counsel.	6/13/2022	0.5	310.00	155.00	Legal - Case Administration
John Hall	Communication to AMD regarding claimant registration issues	6/13/2022	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/13/2022	0.6	255.00	153.00	Legal - Case Administration
Josh McGraw	Email communication from a claimant with claim detail	6/13/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Reviewing case updates and legal documents	6/13/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Email to JBH with notes re case updates	6/13/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Reviewing legal documents	6/13/2022	1.1	280.00	308.00	Legal - Case Administration
Sam Parker	Internal and external meetings	6/13/2022	1.3	180.00	234.00	Legal - Case Administration
	investor list, communication and data collection; asset acquisition; communication with counsel; communication with defendant representation; form 56 preparation; receiver checklist review and calendaring items requested in appointing order; researching insurance policies for assets and communication with insurance brokers; visiting entity and property locations in Henderson and Las Vegas	6/14/2022	8.0	240.00	1,920.00	Legal - Case Administration
Amanda Deering	Calls and emails with counsel, parties, third parties, manage assets	6/14/2022	8.1	340.00	2,754.00	Legal - Case Administration
Geoff Winkler	Team meeting to discuss outstanding tasks	6/14/2022	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Team meeting with counsel and staff.	6/14/2022	0.5	310.00	155.00	Legal - Case Administration
John Hall	Team meeting case discussion	6/14/2022	0.1	310.00	31.00	Legal - Case Administration
John Hall	Discussion of outstanding case issues with GBW.	6/14/2022	0.5	310.00	155.00	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/14/2022	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Meeting with counsel discussing case and next steps	6/14/2022	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Communication with MBB regarding counsel call	6/14/2022	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Meeting with counsel discussing case and next steps	6/14/2022	0.5	280.00	140.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	6/14/2022	0.1	280.00	28.00	Legal - Case Administration
Sam Parker	Team meeting discussing current and future tasks	6/14/2022	0.1	180.00	18.00	Legal - Case Administration
	Asset Spreadsheet; Obtaining Assets, Meeting with defendant re: asset handover; meeting with counsel	6/14/2022	7.0	180.00	1,260.00	Legal - Claims Administration and Objections
Sam Parker	Field work to find defendants and discuss asset turnover	6/15/2022	2.5	180.00	450.00	Legal - Asset Analysis and Recovery
Sam Parker	Asset Spreadsheet: Real Property and Vehicle updates	6/15/2022	4.5	180.00	810.00	Legal - Asset Disposition
	investor list, communication and data collection; asset acquisition; communication with counsel; communication with defendant representation; form 56 preparation; receiver checklist review and calendaring items requested in appointing order; researching insurance policies for assets and communication with insurance brokers; visiting entity and property locations in Henderson and Las Vegas	6/15/2022	9.5	240.00	2,280.00	Legal - Case Administration
Amanda Deering	Calls and emails with counsel, parties, third parties, manage assets	6/15/2022	9.5	340.00	3,230.00	Legal - Case Administration
Geoff Winkler	Communication with MBB re filing financial documents	6/15/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Team call with counsel and receiver's team.	6/15/2022	0.4	310.00	124.00	Legal - Case Administration
John Hall	Meeting with counsel discussing case and next steps	6/15/2022	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Communication with JBH re file management for newly received documents	6/15/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Reviewing and filing financial documents	6/15/2022	0.5	280.00	140.00	Legal - Case Administration
Milana Barkhanoy	Communication to GBW re filing financial documents	6/15/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Meeting with counsel discussing case and next steps	6/15/2022	0.5	280.00	140.00	Legal - Case Administration
Milana Barkhanoy	Communication from GBW re financial documents	6/15/2022	0.1	280.00	28.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Sam Parker	SEC and Defendant Stipulation Review	6/15/2022	1.0	180.00	180.00	Legal - Case Administration
Sam Parker	Internal Discussion with counsel	6/15/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Field work to contact defendants about asset turnover	6/16/2022	2.0	180.00	360.00	Legal - Asset Analysis and Recovery
Sam Parker	Asset Updates IOLTA and Bank account information	6/16/2022	2.5	180.00	450.00	Legal - Asset Disposition
	Visiting locations for assets and entities, looking for defendants to discuss case; met with CPA for entity and counsel for another entity; continuing to put together an investor list; communication with investors; creating a list of counsel and reviewing docs to compile counsel information for all defendants, third parties, plaintiffs and creditors; connecting with insurance brokers re: putting an insurance policy in place to cover vehicles and properties in our possession. Reviewing Case Checklist, new steps and reviewing documents.	6/16/2022	8.0	240.00	1,920.00	Legal - Case Administration
Amanda Deering	Calls and emails with counsel, parties, third parties, manage assets	6/16/2022	8.2	340.00	2,788.00	Legal - Case Administration
Geoff Winkler	Review and process assets and categorization in banking platform setup	6/16/2022	1.5	310.00	465.00	Legal - Case Administration
John Hall	Meeting with counsel discussing case and next steps	6/16/2022	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Stipulation review and Asset List Update	6/16/2022	3.3	180.00	594.00	Legal - Case Administration
Sam Parker	Team Meeting	6/16/2022	0.3	180.00	54.00	Legal - Case Administration
	Acquiring assets from Defendant; meeting with counsel to discuss next steps; continuing to put together an investor list; communication with investors; finalized the creation of list of counsel and reviewing all documents to ensure completion. connecting with insurance brokers re: putting an insurance policy in place to cover vehicles and properties in our possession. Communication with warehouse manager regarding details for vehicle management. Reviewing documents for EINs.	6/17/2022	9.0	240.00	2,160.00	Legal - Case Administration
Amanda Deering	Calls and emails with counsel, parties, third parties, manage assets	6/17/2022	6.4	340.00	2,176.00	Legal - Case Administration
Geoff Winkler	File review and meeting with Receiver's team and counsel.	6/17/2022	0.5	310.00	155.00	Legal - Case Administration
John Hall	Meeting with counsel discussing case and next steps	6/17/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Email from MP re financial documents	6/17/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Email to MP re online document storage	6/17/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Setting up access and reviewing documents in the new cloud system	6/17/2022	0.4	280.00	112.00	Legal - Case Administration
Milana Barkhanoy	Multiple emails with SP from counsel re documents	6/17/2022	0.3	280.00	84.00	Legal - Case Administration
	Acquiring assets from Defendant; meeting with counsel to discuss next steps; connecting with insurance brokers re: putting an insurance policy in place to cover vehicles and properties in our possession; updating asset spreadsheet; verifying VINs of collected vehicles; videoing acquired properties	6/17/2022	6.0	180.00	1,080.00	Legal - Case Administration
Sam Parker	Meeting to discuss asset list, what is currently in possession and next steps	6/20/2022	0.3	240.00	72.00	Legal - Asset Analysis and Recovery
Amanda Deering	Meeting with AMD to discuss asset list, what is currently in possession and next steps	6/20/2022	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Meeting to discuss asset list, what is currently in possession and next steps	6/20/2022	0.3	180.00	54.00	Legal - Asset Analysis and Recovery
Sam Parker	Reviewing documents from the federal case and discussing investor information	6/20/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Communication with AMD, JPM regarding case details: investor list	6/20/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	communication regarding insurance policy set up for vehicles and properties	6/20/2022	0.5	240.00	120.00	Legal - Case Administration
Amanda Deering	Read Beasley transcript	6/20/2022	0.8	240.00	192.00	Legal - Case Administration
Amanda Deering	Reviewing asset list for defendant	6/20/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Communication with MBB re: case work from field, findings and next steps	6/20/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Team meeting discussing current and future tasks	6/20/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Communication with AMD re: case work from field, findings and next steps	6/20/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	communication re: investor list	6/20/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Communication with real estate broker re: next steps	6/20/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Communication with Investor	6/20/2022	0.9	240.00	216.00	Legal - Case Administration
Amanda Deering	Communication re: potential new assets	6/20/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Write memo re promoters involvement	6/20/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Investor list	6/20/2022	0.4	240.00	96.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/20/2022	3.4	340.00	1,156.00	Legal - Case Administration
Geoff Winkler	Team meeting to discuss outstanding tasks	6/20/2022	0.1	340.00	34.00	Legal - Case Administration
John Hall	Staff meeting to discuss ongoing casework items.	6/20/2022	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/20/2022	0.1	255.00	25.50	Legal - Case Administration
Milana Barkhanoy	Multiple emails with SP from AM re documents in cloud storage	6/20/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Team meeting to discuss outstanding tasks	6/20/2022	0.1	280.00	28.00	Legal - Case Administration
Milana Barkhanoy	Call with SP from counsel documents stored in the new cloud system	6/20/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Communication with MBB re: case work from field, findings and next steps	6/20/2022	0.3	280.00	84.00	Legal - Case Administration
Sam Parker	Reviewing Case Files	6/20/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Team meeting discussing current and future tasks	6/20/2022	0.1	180.00	18.00	Legal - Case Administration
Sam Parker	Communication with AMD regarding case details: investor list	6/20/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Asset Spreadsheet Updates according to SEC and defendants filings	6/20/2022	2.0	180.00	360.00	Legal - Case Administration
Sam Parker	Reviewing court documents	6/20/2022	1.0	180.00	180.00	Legal - Case Administration
Sam Parker	Reviewing multiple emails from AM re documents in cloud storage	6/20/2022	0.2	180.00	36.00	Legal - Case Administration
Geoff Winkler	Review and process wires, emails with counsel re payments	6/21/2022	0.3	340.00	102.00	Financial - Accounting/Auditing
John Hall	Review accounts and reconciling against lists of accounts provided by counsel.	6/21/2022	2.0	310.00	620.00	Financial - Accounting/Auditing
John Hall	Review and enter wires into system.	6/21/2022	0.2	310.00	62.00	Financial - Corporate Finance
Sam Parker	Inserting assets into Stretto	6/21/2022	1.6	180.00	288.00	Legal - Asset Disposition
Amanda Deering	Communication re: setting up insurance policy	6/21/2022	1.0	240.00	240.00	Legal - Case Administration
Amanda Deering	Communication with additional investor	6/21/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Updating investor list	6/21/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Communication with an insurance broker	6/21/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Call with GBW re: insurance policy, investor list and SEC memo for next steps	6/21/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Research contacts for promoters	6/21/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Additional communication re: insurance	6/21/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Discussing pleadings	6/21/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Discussion with SP re: investor communication	6/21/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Communication re: insurance policy for vehicles with GBW and other potential brokers	6/21/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Communication with potential Insurance brokers, compiling information and email	6/21/2022	0.6	240.00	144.00	Legal - Case Administration
Amanda Deering	Communication re: GBW request around promoter involvement research	6/21/2022	0.8	240.00	192.00	Legal - Case Administration
Geoff Winkler	Call with counsel for defendant	6/21/2022	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Call with AD to discuss investor lists	6/21/2022	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Attend BK court hearing	6/21/2022	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Call with interested parties	6/21/2022	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Call with defendant	6/21/2022	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Call with third party re investment, status, documents, email with counsel	6/21/2022	0.6	340.00	204.00	Legal - Case Administration
Geoff Winkler	Communication re: insurance policy for vehicles with GBW and other potential brokers	6/21/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Research insurance issues, discuss with insurance brokers, follow up	6/21/2022	1.3	340.00	442.00	Legal - Case Administration
John Hall	Review pleading and discuss with GBW	6/21/2022	0.2	310.00	62.00	Legal - Case Administration
Josh McGraw	Communication with GBW regarding transfer of utilities	6/21/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with utility provider to transfer gas service	6/21/2022	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Review asset information to transfer utilities	6/21/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Communication with SBP regarding asset information	6/21/2022	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with utility provider to transfer trash service	6/21/2022	0.4	255.00	102.00	Legal - Case Administration
Josh McGraw	Communication with AMD regarding log in information	6/21/2022	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with utility provider to transfer energy services	6/21/2022	0.8	255.00	204.00	Legal - Case Administration
Josh McGraw	Gathering information to complete form provided by energy provider	6/21/2022	0.3	255.00	76.50	Legal - Case Administration
Josh McGraw	Call with utility provider to transfer water services	6/21/2022	0.2	255.00	51.00	Legal - Case Administration
Milana Barkhanoy	Reviewing current tasks with AMD, determining next steps	6/21/2022	0.1	280.00	28.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
	Reviewing document storage in cloud with SBP, determining next steps for file management	6/21/2022	0.5	280.00	140.00	Legal - Case Administration
Milana Barkhanoy						
Sam Parker	Discussion with AMD re: investor communication	6/21/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Communication with JPM regarding asset information	6/21/2022	0.1	180.00	18.00	Legal - Case Administration
Sam Parker	Investor calls	6/21/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Phone call with investor	6/21/2022	0.1	180.00	18.00	Legal - Case Administration
Sam Parker	Reviewing documents	6/21/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Review discovery and prepare for the receiver	6/21/2022	2.9	180.00	522.00	Legal - Case Administration
Sam Parker	Reviewing docs, sending information to GW	6/21/2022	0.2	180.00	36.00	Legal - Case Administration
John Hall	Set up access to Disco, review MBB output. review bank statements.	6/21/2022	1.1	310.00	341.00	Financial - Accounting/Auditing
Josh McGraw	Confirming ownership for property	6/22/2022	0.1	255.00	25.50	Legal - Asset Analysis and Recovery
Josh McGraw	Review information provided by SJ on asset valuation	6/22/2022	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Milana Barkhanoy	Chat with JBH discussing next steps in asset recovery	6/22/2022	0.2	280.00	56.00	Legal - Asset Analysis and Recovery
	Reviewing TLO, property histories, corporate affiliations and communicating with investor to learn more about potential defendants and write Memo for SEC, communication with SP regarding entities that investors were sending money to and TLOs	6/22/2022	4.9	240.00	1,176.00	Legal - Case Administration
Amanda Deering						
Amanda Deering	Communication with insurance brokers re: policies for vehicles	6/22/2022	1.3	240.00	312.00	Legal - Case Administration
Amanda Deering	J&J utilities and accounts with JPM	6/22/2022	0.5	240.00	120.00	Legal - Case Administration
Amanda Deering	Communication around investor list, email, and reviewing and adding to investor list	6/22/2022	0.5	240.00	120.00	Legal - Case Administration
Amanda Deering	Email communication with an investor	6/22/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Reviewing Jager's investor list and updating investor list with contacts	6/22/2022	2.0	240.00	480.00	Legal - Case Administration
Geoff Winkler	Review BK case pleadings	6/22/2022	1.4	340.00	476.00	Legal - Case Administration
Geoff Winkler	Review promoter information, email to TC	6/22/2022	0.2	340.00	68.00	Legal - Case Administration
	Call with defendant's counsel, call with counsel to discuss asset, non-compliance, call with counsel re potential litigation, review additional pleadings	6/22/2022	3.8	340.00	1,292.00	Legal - Case Administration
Geoff Winkler						
John Hall	Review draft from counsel and discuss with GBW.	6/22/2022	0.5	310.00	155.00	Legal - Case Administration
John Hall	Discuss motions and timing of asset turnover with GBW	6/22/2022	0.4	310.00	124.00	Legal - Case Administration
John Hall	Convert pdf file from defendant to allow integration into investor contact list.	6/22/2022	0.8	310.00	248.00	Legal - Case Administration
John Hall	Review memo from GBW	6/22/2022	0.1	310.00	31.00	Legal - Case Administration
Josh McGraw	Asset utilities and accounts with AMD	6/22/2022	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Email to GBW regarding on-site and next steps	6/22/2022	0.1	255.00	25.50	Legal - Case Administration
	Summarizing documents storage and structure into overview and sending email notification to team	6/22/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy						
Milana Barkhanoy	Reviewing documents in Disco cloud	6/22/2022	0.3	280.00	84.00	Legal - Case Administration
Sam Parker	Accumulating acquired asset list to send to Allen Madkins	6/22/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Asset validation for real property in Henderson, NV	6/22/2022	0.1	180.00	18.00	Legal - Case Administration
Sam Parker	Reviewing background reports; researching possible defendants	6/22/2022	1.7	180.00	306.00	Legal - Case Administration
Sam Parker	Call with Investor	6/22/2022	0.4	180.00	72.00	Legal - Case Administration
Sam Parker	Communication with AMD re: TLO reports	6/22/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Communication with AMD regarding investor list and investor calls	6/22/2022	0.5	180.00	90.00	Legal - Case Administration
Amanda Deering	Communication re: sale of assets	6/23/2022	0.2	240.00	48.00	Legal - Asset Analysis and Recovery
	Email communication with Broker, reviewing insurance policy and updating spreadsheet to reflect insured vehicles, updating additionally insured	6/23/2022	2.1	240.00	504.00	Legal - Case Administration
Amanda Deering						
Amanda Deering	Reviewing Pleadings for disbursement numbers for defendants	6/23/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Conversion re: creating claimant database and next steps	6/23/2022	0.5	240.00	120.00	Legal - Case Administration
Amanda Deering	Communication with SP regarding investor list	6/23/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Email communication with investor and updating investor list	6/23/2022	0.3	240.00	72.00	Legal - Case Administration
Geoff Winkler	Call with defendant and counsel	6/23/2022	0.5	340.00	170.00	Legal - Case Administration
Geoff Winkler	Call with counsel for defendant	6/23/2022	0.5	340.00	170.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/23/2022	2.9	340.00	986.00	Legal - Case Administration
Josh McGraw	Conversion re: creating claimant database and next steps	6/23/2022	0.5	255.00	127.50	Legal - Case Administration
Milana Barkhanoy	Call with JBH to discuss bank documents in preparation for forensic accounting	6/23/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Reviewing and reconciling received files	6/23/2022	2.1	280.00	588.00	Legal - Case Administration
Milana Barkhanoy	Chat from JBH re new task status and next steps	6/23/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Creating schedule and documenting file contents; identifying missing data	6/23/2022	3.2	280.00	896.00	Legal - Case Administration
Sam Parker	Updating Investor List	6/23/2022	2.7	180.00	486.00	Legal - Case Administration
Sam Parker	Checking list of unfrozen bank accounts for Wells Fargo Attorney	6/23/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	communication with AMD regarding investor list	6/23/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Updating and sending asset list to Allen Madkins	6/23/2022	1.0	180.00	180.00	Legal - Case Administration
Sam Parker	Compiling asset list of properties owned by entities not named as defendants that are owned by defendants	6/23/2022	2.4	180.00	432.00	Legal - Case Administration
Sam Parker	Reviewing Case documents	6/23/2022	0.6	180.00	108.00	Legal - Case Administration
Sam Parker	Reviewing asset list from defendant; updating spreadsheet	6/23/2022	0.2	180.00	36.00	Legal - Case Administration
John Hall	Work through banking access and account issues with MW	6/24/2022	1.0	310.00	310.00	Financial - Corporate Finance
Amanda Deering	Communication re: sale of property	6/24/2022	0.2	240.00	48.00	Legal - Asset Analysis and Recovery
Geoff Winkler	Emails and chat with JBH and MBB re missing bank documentation	6/24/2022	0.2	340.00	68.00	Legal - Asset Analysis and Recovery
John Hall	Reviewing and analyzing assets, asset entry and categorization into accounting program. Discussion of state of car assets with GBW.	6/24/2022	3.5	310.00	1,085.00	Legal - Asset Analysis and Recovery
John Hall	Emails and chat with GBW and MBB re missing bank documentation	6/24/2022	0.2	310.00	62.00	Legal - Asset Analysis and Recovery
Amanda Deering	Communication re: insurance policy next steps	6/24/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Investor list and email communication re status	6/24/2022	0.3	240.00	72.00	Legal - Case Administration
Geoff Winkler	Calls and emails with counsel, parties, third parties, manage assets	6/24/2022	3.3	340.00	1,122.00	Legal - Case Administration
Geoff Winkler	Review draft motion, emails with counsel	6/24/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Call to discuss potential litigation	6/24/2022	0.4	340.00	136.00	Legal - Case Administration
Geoff Winkler	Calls with counsel for defendant re asset turnover, logistics	6/24/2022	0.4	340.00	136.00	Legal - Case Administration
Milana Barkhanoy	Call with JBH re identifying missing bank documents	6/24/2022	0.2	280.00	56.00	Legal - Case Administration
Milana Barkhanoy	Multiple chats with JBH re identifying missing bank documents	6/24/2022	0.3	280.00	84.00	Legal - Case Administration
Milana Barkhanoy	Reviewing received documents to identifying missing data	6/24/2022	4.6	280.00	1,288.00	Legal - Case Administration
Milana Barkhanoy	Compiling report of missing bank documentation	6/24/2022	1.9	280.00	532.00	Legal - Case Administration
Milana Barkhanoy	Email to JBH and GBW re bank statements needed for accounting	6/24/2022	0.1	280.00	28.00	Legal - Case Administration
John Hall	Review banking issues with GBW	6/25/2022	0.3	310.00	93.00	Financial - Corporate Finance
John Hall	Review counsel analysis and associated documents and related pleadings.	6/25/2022	1.4	310.00	434.00	Legal - Case Administration
John Hall	Review and discuss engagement letter with GBW and counsel.	6/27/2022	0.5	310.00	155.00	Financial - Tax Issues
Sam Parker	Updating VINs into Asset Spreadsheet	6/27/2022	1.6	180.00	288.00	Legal - Asset Disposition
Amanda Deering	Investor list updates	6/27/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Insurance communication re: vehicles	6/27/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Team meeting discussing current and future tasks	6/27/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Communication with investor regarding necessity to share receiver contact on website	6/27/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Updating insurance broker about soon to be acquired assets	6/27/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Reviewing documents	6/27/2022	1.5	240.00	360.00	Legal - Case Administration
Amanda Deering	Discussion of case details, pleadings and upcoming report	6/27/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Significant additional updating of the investor list with information from defendants	6/27/2022	2.7	240.00	648.00	Legal - Case Administration
Geoff Winkler	Review emails from two defendants re account status, SP re stipulation, review banking and stipulation, email to TC, call with bank	6/27/2022	0.7	340.00	238.00	Legal - Case Administration
Geoff Winkler	Emails with counsel, call with counsel for defendant, update to counsel	6/27/2022	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Emails with counsel re asset sales, research and review valuation, email with counsel	6/27/2022	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Work with SP re accounts, stipulations	6/27/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Work with banks re account closures, transfers	6/27/2022	0.3	340.00	102.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Geoff Winkler	Discussion with investor re third party	6/27/2022	0.3	340.00	102.00	Legal - Case Administration
Geoff Winkler	Email with parties re BK filing	6/27/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Process wire transfers	6/27/2022	0.3	340.00	102.00	Legal - Case Administration
John Hall	Review asset sale draft docs and discuss with GBW.	6/27/2022	0.3	310.00	93.00	Legal - Case Administration
John Hall	Review interested party memo and save to file.	6/27/2022	0.1	310.00	31.00	Legal - Case Administration
John Hall	Review and update important information document.	6/27/2022	0.4	310.00	124.00	Legal - Case Administration
Josh McGraw	Team meeting discussing current and future tasks	6/27/2022	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Discussion of case details, pleadings and upcoming report	6/27/2022	0.3	255.00	76.50	Legal - Case Administration
Sam Parker	Review emails from two defendants re account status, communication with GW re stipulation, review banking and stipulation	6/27/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Work with GBW re accounts, stipulations	6/27/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Reviewing stipulations re: living expenses to resolve unauthorized Wells Fargo bank account withdrawals	6/27/2022	0.7	180.00	126.00	Legal - Case Administration
Sam Parker	Team meeting discussing current and future tasks	6/27/2022	0.1	180.00	18.00	Legal - Case Administration
Sam Parker	Comparing Stretto banking with defendant's statement about wire transfers from Wells Fargo	6/27/2022	0.7	180.00	126.00	Legal - Case Administration
Sam Parker	Call with GBW regarding defendant claims of unjust transfers	6/27/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Updating asset spreadsheet	6/27/2022	1.2	180.00	216.00	Legal - Case Administration
Amanda Deering	Researching information on assets for insurance and communication with broker	6/28/2022	0.5	240.00	120.00	Legal - Asset Analysis and Recovery
Josh McGraw	Reviewing county website to determine recorded information for sales comps	6/28/2022	0.3	255.00	76.50	Legal - Asset Analysis and Recovery
Josh McGraw	Research dealerships in the region to determine value of personal property	6/28/2022	0.2	255.00	51.00	Legal - Asset Analysis and Recovery
Amanda Deering	Change of addresses for mail for defendant entities	6/28/2022	2.8	240.00	672.00	Legal - Case Administration
Amanda Deering	Communication re: insurance	6/28/2022	0.6	240.00	144.00	Legal - Case Administration
Amanda Deering	Investor list updates	6/28/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Discussion with SBP re: investor list and investor communication	6/28/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Discussion re: property and utilities	6/28/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Call with team and counsel to discuss outstanding tasks and next steps	6/28/2022	0.1	240.00	24.00	Legal - Case Administration
Amanda Deering	Initial report and background	6/28/2022	1.0	240.00	240.00	Legal - Case Administration
Amanda Deering	Communication around assets lists needed	6/28/2022	0.2	240.00	48.00	Legal - Case Administration
Geoff Winkler	Call with defendants, meeting with third parties, meeting with team, investigate assets, call with counsel and team	6/28/2022	6.9	340.00	2,346.00	Legal - Case Administration
John Hall	Field work in LVNV with GBW and MBB, review draft motion to sell personal property and discuss with team, review and update task list, review and categorize assets in accounting program, review and edit asset list. Team meeting with counsel and staff (.7)	6/28/2022	4.5	310.00	1,395.00	Legal - Case Administration
Josh McGraw	Call with AMD regarding asset tasks and counsel email	6/28/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Reviewing required tax documents to transfer utilities	6/28/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with counsel and team to discuss current and future tasks	6/28/2022	0.7	255.00	178.50	Legal - Case Administration
Milana Barkhanoy	Field work in LVNV with GBW and JBH, review draft motion to sell personal property and discuss with team, review and update task list, review and categorize assets in accounting program, review and edit asset list. Team meeting with counsel and staff (.7)	6/28/2022	4.5	280.00	1,260.00	Legal - Case Administration
Sam Parker	Updating asset spreadsheet based on defendant asset disclosure	6/28/2022	0.8	180.00	144.00	Legal - Case Administration
Sam Parker	Scanning utility, property tax, and other bills for J&J	6/28/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Investor Call	6/28/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Reviewing case documents	6/28/2022	0.6	180.00	108.00	Legal - Case Administration
Sam Parker	Updating Investor List	6/28/2022	0.4	180.00	72.00	Legal - Case Administration
Sam Parker	Call with AMD re: investors	6/28/2022	0.4	180.00	72.00	Legal - Case Administration
Sam Parker	Updating Asset Spreadsheet	6/28/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Call with counsel and team to discuss current and future tasks	6/28/2022	0.7	180.00	126.00	Legal - Case Administration
Josh McGraw	Call with SBP regarding assets and next steps	6/29/2022	0.3	255.00	76.50	Legal - Asset Analysis and Recovery

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Sam Parker	Call with JPM regarding assets and next steps	6/29/2022	0.3	180.00	54.00	Legal - Asset Analysis and Recovery
Amanda Deering	First report research, document review and writing	6/29/2022	1.5	240.00	360.00	Legal - Case Administration
Amanda Deering	Change of location for J&J, post office because of inability to do online	6/29/2022	0.7	240.00	168.00	Legal - Case Administration
Amanda Deering	Meeting with SBP about next steps re: new SEC complaint	6/29/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Reviewing and summarizing SEC complaint; adding information to spreadsheets re: defendant contact info and communicating with team	6/29/2022	1.1	240.00	264.00	Legal - Case Administration
Amanda Deering	Research on assets and communication with broker re: insurance for soon to be acquired assets	6/29/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Communication with post office re: change of location for defendant entities	6/29/2022	0.3	240.00	72.00	Legal - Case Administration
Amanda Deering	Investor communication review, updating investor list and letting Receiver know about new potential promoters	6/29/2022	0.5	240.00	120.00	Legal - Case Administration
Geoff Winkler	Meeting to discuss potential litigation, calls with counsel for parties, review updated pleadings, call with third party re frozen assets and turnover, respond to emails and calls from third parties.	6/29/2022	6.5	340.00	2,210.00	Legal - Case Administration
John Hall	Field work in LVNV with GBW and MBB; meeting at counsel to interview potential litigation counsel. Meet with interested parties, review amended complaint, discuss with team, review six additional filings, update asset list, call with defendant re: Asset turnover.	6/29/2022	7.0	310.00	2,170.00	Legal - Case Administration
Milana Barkhanoy	Field work in LVNV with GBW and JBH; meeting at counsel to interview potential litigation counsel. Meet with interested parties, review amended complaint, discuss with team, review six additional filings, update asset list, call with defendant re: Asset turnover.	6/29/2022	7.0	280.00	1,960.00	Legal - Case Administration
Sam Parker	Meeting with AMD about next steps re: new SEC complaint	6/29/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Review background information and gather asset information for use in case	6/29/2022	1.3	180.00	234.00	Legal - Case Administration
Sam Parker	Updating defendant individual asset sheet	6/29/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Checking Lis Pendens on Receivership property	6/29/2022	0.9	180.00	162.00	Legal - Case Administration
Sam Parker	Updating asset sheet	6/29/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Updating Asset Sheet - defendant TLO	6/29/2022	0.7	180.00	126.00	Legal - Case Administration
Amanda Deering	Discussion with SBP re: report writing and voicemail	6/30/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Combining court files and posting to website	6/30/2022	0.4	240.00	96.00	Legal - Case Administration
Amanda Deering	Creating email for distribution to investors, update additional individuals to the list serve, review and send investor update email	6/30/2022	0.8	240.00	192.00	Legal - Case Administration
Amanda Deering	Processing and Reviewing files from defendants counsel	6/30/2022	0.8	240.00	192.00	Legal - Case Administration
Amanda Deering	Call with AMD regarding emailing investors through website application	6/30/2022	0.2	240.00	48.00	Legal - Case Administration
Amanda Deering	Call with AMD, JPM regarding emailing investors through website application	6/30/2022	0.2	240.00	48.00	Legal - Case Administration
Geoff Winkler	Call from JPM regarding utilities issue	6/30/2022	0.1	340.00	34.00	Legal - Case Administration
Geoff Winkler	Communication with JPM regarding utility issues	6/30/2022	0.2	340.00	68.00	Legal - Case Administration
Geoff Winkler	Calls with third parties, asset review, meetings with defendants, asset coordination, work in the field	6/30/2022	7.9	340.00	2,686.00	Legal - Case Administration
John Hall	Field work in LVNV with MBB, GBW. Meeting with defendant re: asset review and turnover, secure Sky Arc Property, review asset and task list with team, review draft and bankruptcy report, review conflicts check, work with BT team re: engagement agreement.	6/30/2022	8.8	310.00	2,728.00	Legal - Case Administration
Josh McGraw	Call from GBW regarding utilities issue	6/30/2022	0.1	255.00	25.50	Legal - Case Administration
Josh McGraw	Call with utility company to transfer water service	6/30/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Email to utility provide to provide documentation to request service change	6/30/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Calls with utility provider to fix power issue	6/30/2022	1.7	255.00	433.50	Legal - Case Administration
Josh McGraw	Communication with GBW regarding utility issues	6/30/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with utility provider to transfer services for internet and communications	6/30/2022	0.5	255.00	127.50	Legal - Case Administration
Josh McGraw	Emails to power company regarding power issue	6/30/2022	0.2	255.00	51.00	Legal - Case Administration
Josh McGraw	Call with AMD regarding emailing investors through website application	6/30/2022	0.2	255.00	51.00	Legal - Case Administration

SEC v. J&J Consulting Services, Inc. et al.
 Summary of Fees of Receiver and Retained Personnel
 June 3, 2022 - June 30, 2022
 (Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Milana Barkhanoy	Field work in LVNV with JBH, GBW. Meeting with defendant re: asset review and turnover, secure Sky Arc Property, review asset and task list with team, review documents received from counsel	6/30/2022	8.8	280.00	2,464.00	Legal - Case Administration
Sam Parker	Reviewing case documents	6/30/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Updating Asset Sheet - defendant TLO	6/30/2022	0.7	180.00	126.00	Legal - Case Administration
Sam Parker	Verifying property ownership via county assessor - defendant properties	6/30/2022	1.8	180.00	324.00	Legal - Case Administration
Sam Parker	Updating asset list with defendant TLO	6/30/2022	0.7	180.00	126.00	Legal - Case Administration
Sam Parker	Investor Call	6/30/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Entering Investor Information	6/30/2022	0.1	180.00	18.00	Legal - Case Administration
Sam Parker	Updating Asset Sheet	6/30/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Updating Asset Spreadsheet - defendant TLO	6/30/2022	0.2	180.00	36.00	Legal - Case Administration
Sam Parker	Verifying property ownership via county assessor - defendant properties	6/30/2022	0.3	180.00	54.00	Legal - Case Administration
Sam Parker	Updating Asset Sheet - defendant TLO	6/30/2022	0.5	180.00	90.00	Legal - Case Administration
Sam Parker	Verifying property ownership via county assessor - defendant properties	6/30/2022	0.6	180.00	108.00	Legal - Case Administration
Sam Parker	Discussion with AMD re: report writing and voicemail	6/30/2022	0.2	180.00	36.00	Legal - Case Administration
			Totals	499.5	133,276.00	

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Summary by Activity Category and Personnel						
Financial - Accounting/Auditing	Personnel	Firm	Hours	Rate	Amount	
Financial - Accounting/Auditing	Geoff Winkler	AFS	0.3	340.00	\$ 102.00	
Financial - Accounting/Auditing	John Hall	AFS	3.5	310.00	\$ 1,085.00	
Financial - Accounting/Auditing	Milana Barkhanoy	AFS	0.0	280.00	\$ -	
Financial - Accounting/Auditing	Josh McGraw	AFS	0.0	255.00	\$ -	
Financial - Accounting/Auditing	Amanda Deering	AFS	0.0	240.00	\$ -	
Financial - Accounting/Auditing	Sam Parker	AFS	0.0	180.00	\$ -	
			<u>3.8</u>		<u>\$ 1,187.00</u>	
Financial - Corporate Finance	Personnel	Firm	Hours	Rate	Amount	
Financial - Corporate Finance	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Corporate Finance	John Hall	AFS	1.5	310.00	\$ 465.00	
Financial - Corporate Finance	Milana Barkhanoy	AFS	0.0	280.00	\$ -	
Financial - Corporate Finance	Josh McGraw	AFS	0.0	255.00	\$ -	
Financial - Corporate Finance	Amanda Deering	AFS	0.0	240.00	\$ -	
Financial - Corporate Finance	Sam Parker	AFS	0.0	180.00	\$ -	
			<u>1.5</u>		<u>\$ 465.00</u>	
Financial - Tax Issues	Personnel	Firm	Hours	Rate	Amount	
Financial - Tax Issues	Geoff Winkler	AFS	0.0	340.00	\$ -	
Financial - Tax Issues	John Hall	AFS	0.5	310.00	\$ 155.00	
Financial - Tax Issues	Milana Barkhanoy	AFS	0.0	280.00	\$ -	
Financial - Tax Issues	Josh McGraw	AFS	0.0	255.00	\$ -	
Financial - Tax Issues	Amanda Deering	AFS	0.0	240.00	\$ -	
Financial - Tax Issues	Sam Parker	AFS	0.0	180.00	\$ -	
			<u>0.5</u>		<u>\$ 155.00</u>	
Legal - Asset Analysis and Recovery	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Analysis and Recovery	Geoff Winkler	AFS	0.2	340.00	\$ 68.00	
Legal - Asset Analysis and Recovery	John Hall	AFS	3.8	310.00	\$ 1,178.00	
Legal - Asset Analysis and Recovery	Milana Barkhanoy	AFS	1.5	280.00	\$ 420.00	
Legal - Asset Analysis and Recovery	Josh McGraw	AFS	6.1	255.00	\$ 1,555.50	
Legal - Asset Analysis and Recovery	Amanda Deering	AFS	9.4	240.00	\$ 2,256.00	
Legal - Asset Analysis and Recovery	Sam Parker	AFS	29.5	180.00	\$ 5,310.00	
			<u>50.5</u>		<u>\$ 10,787.50</u>	
Legal - Asset Disposition	Personnel	Firm	Hours	Rate	Amount	
Legal - Asset Disposition	Geoff Winkler	AFS	0.0	340.00	\$ -	
Legal - Asset Disposition	John Hall	AFS	0.0	310.00	\$ -	
Legal - Asset Disposition	Milana Barkhanoy	AFS	0.0	280.00	\$ -	
Legal - Asset Disposition	Josh McGraw	AFS	0.0	255.00	\$ -	
Legal - Asset Disposition	Amanda Deering	AFS	0.0	240.00	\$ -	
Legal - Asset Disposition	Sam Parker	AFS	10.2	180.00	\$ 1,836.00	
			<u>10.2</u>		<u>\$ 1,836.00</u>	
Legal - Case Administration	Personnel	Firm	Hours	Rate	Amount	
Legal - Case Administration	Geoff Winkler	AFS	140.3	340.00	\$ 47,702.00	
Legal - Case Administration	John Hall	AFS	42.1	310.00	\$ 13,051.00	

SEC v. J&J Consulting Services, Inc. et al.
Summary of Fees of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022
(Sorted in Chronological Order by Activity Category)

Attachment 1

Personnel	Item / Description	Date	Hours	Rate	Amount	Activity Category
Legal - Case Administration	Milana Barkhanoy	AFS	47.6	280.00	\$ 13,328.00	
Legal - Case Administration	Josh McGraw	AFS	24.3	255.00	\$ 6,196.50	
Legal - Case Administration	Amanda Deering	AFS	105.0	240.00	\$ 25,200.00	
Legal - Case Administration	Sam Parker	AFS	65.0	180.00	\$ 11,700.00	
			<u>424.3</u>		<u>\$ 117,177.50</u>	
Legal - Claims Administration and Objections	Personnel	Firm	Hours	Rate	Amount	
Legal - Claims Administration and Objections	Geoff Winkler	AFS	0.0	340.00	\$ -	
Legal - Claims Administration and Objections	John Hall	AFS	0.0	310.00	\$ -	
Legal - Claims Administration and Objections	Milana Barkhanoy	AFS	0.0	280.00	\$ -	
Legal - Claims Administration and Objections	Josh McGraw	AFS	0.0	255.00	\$ -	
Legal - Claims Administration and Objections	Amanda Deering	AFS	1.7	240.00	\$ 408.00	
Legal - Claims Administration and Objections	Sam Parker	AFS	7.0	180.00	\$ 1,260.00	
			<u>8.7</u>		<u>\$ 1,668.00</u>	
Overall Summary						
Totals	Personnel	Firm	Hours	Rate	Amount	
	Geoff Winkler	AFS	140.8	340.00	\$ 47,872.00	
	John Hall	AFS	51.4	310.00	\$ 15,934.00	
	Milana Barkhanoy	AFS	49.1	280.00	\$ 13,748.00	
	Josh McGraw	AFS	30.4	255.00	\$ 7,752.00	
	Amanda Deering	AFS	116.1	240.00	\$ 27,864.00	
	Sam Parker	AFS	111.7	180.00	\$ 20,106.00	
			<u>499.5</u>		<u>\$ 133,276.00</u>	
	TOTAL FEES		499.5		\$ 133,276.00	

SEC v. J&J Consulting Services, Inc. et al.

Attachment 2

Summary of Expenses of Receiver and Retained Personnel
June 3, 2022 - June 30, 2022

Incurred By	Payee	Item / Description	Date Incurred	Amount	Category
Amanda Deering	Alaska Airlines	Alaska Air - AD	6/3/2022	588.59	Airfare
Geoff Winkler	Alaska Airlines	Alaska Air - GBW	6/3/2022	588.59	Airfare
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/5/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/5/2022	51.75	Individual Meals
Geoff Winkler	Alaska Airlines	Alaska Air GoGo Internet	6/5/2022	8.00	Internet/Online Fees
Geoff Winkler	Uber	Uber	6/5/2022	39.04	Taxi
Sam Parker	Per Diem	J&J Consulting Per Diem	6/5/2022	51.75	Individual Meals
Sam Parker	Uber	Uber	6/5/2022	22.99	Taxi
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/6/2022	69.00	Individual Meals
Geoff Winkler	GoDaddy.com	GoDaddy website	6/6/2022	21.18	Miscellaneous
Geoff Winkler	GoDaddy.com	GoDaddy website	6/6/2022	83.77	Miscellaneous
Geoff Winkler	GoDaddy.com	GoDaddy website	6/6/2022	107.88	Miscellaneous
Geoff Winkler	RingCentral	Ring Central phone setup	6/6/2022	44.06	Miscellaneous
Sam Parker	Per Diem	J&J Consulting Per Diem	6/6/2022	69.00	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/7/2022	69.00	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/7/2022	69.00	Individual Meals
Sam Parker	Per Diem	J&J Consulting Per Diem	6/7/2022	69.00	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/8/2022	69.00	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/8/2022	69.00	Individual Meals
Sam Parker	Per Diem	J&J Consulting Per Diem	6/8/2022	69.00	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/9/2022	69.00	Individual Meals
Geoff Winkler	Alaska Airlines	Alaska Air GBW	6/9/2022	617.58	Airfare
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/9/2022	69.00	Individual Meals
Sam Parker	Alaska Airlines	Alaska Air - SP	6/9/2022	617.58	Airfare
Sam Parker	Per Diem	J&J Consulting Per Diem	6/9/2022	69.00	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/10/2022	51.75	Individual Meals
Geoff Winkler	Shell	Shell gasoline	6/10/2022	100.12	Car Rental
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/10/2022	51.75	Individual Meals
Geoff Winkler	Mobile Mechanic RV	Mobile Mechanic RV repair	6/10/2022	442.00	Miscellaneous
Sam Parker	Alaska Airlines	Alaska Air - SP	6/10/2022	588.59	Airfare
Sam Parker	Per Diem	J&J Consulting Per Diem	6/10/2022	51.75	Individual Meals
Sam Parker	Uber	Uber	6/10/2022	57.39	Taxi
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/13/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/13/2022	51.75	Individual Meals
Geoff Winkler	McCarran Airport	McCarran Air Parking	6/13/2022	108.00	Parking
Sam Parker	Per Diem	J&J Consulting Per Diem	6/13/2022	51.75	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/14/2022	69.00	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/14/2022	69.00	Individual Meals
Geoff Winkler	LAZ Parking	LAZ Parking	6/14/2022	15.00	Parking
Sam Parker	Per Diem	J&J Consulting Per Diem	6/14/2022	69.00	Individual Meals
Amanda Deering	Element Hotel	Hotel	6/15/2022	971.80	Hotel
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/15/2022	69.00	Individual Meals
Geoff Winkler	Element Hotel	Hotel	6/15/2022	986.42	Hotel
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/15/2022	69.00	Individual Meals
Sam Parker	Element Hotel	Hotel	6/15/2022	979.91	Hotel
Sam Parker	Per Diem	J&J Consulting Per Diem	6/15/2022	69.00	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/16/2022	69.00	Individual Meals
Geoff Winkler	Alaska Airlines	Alaska Air GBW Airfare	6/16/2022	574.19	Airfare
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/16/2022	69.00	Individual Meals
Sam Parker	Per Diem	J&J Consulting Per Diem	6/16/2022	69.00	Individual Meals
Amanda Deering	Per Diem	J&J Consulting Per Diem	6/17/2022	51.75	Individual Meals
Amanda Deering	Uber	Uber	6/17/2022	36.53	Taxi
Geoff Winkler	Enterprise	Enterprise Car Rental	6/17/2022	625.93	Car Rental
Geoff Winkler	Shell	Fuel for rental car	6/17/2022	35.00	Car Rental
Geoff Winkler	Marriott	Marriott Hotel GBW	6/17/2022	1,363.58	Hotel
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/17/2022	51.75	Individual Meals
Sam Parker	Marriott	Hotel	6/17/2022	1,117.93	Hotel
Sam Parker	Per Diem	J&J Consulting Per Diem	6/17/2022	51.75	Individual Meals
Sam Parker	Uber	Uber	6/17/2022	29.88	Taxi
Amanda Deering	Marriott	Hotel	6/18/2022	1,343.54	Hotel
Amanda Deering	Uber	Uber	6/18/2022	24.31	Taxi
Josh McGraw	Alaska Airlines	Alaska Air - JPM	6/20/2022	584.20	Airfare
Geoff Winkler	Alaska Airlines	Alaska Air Airfare GBW	6/24/2022	50.99	Airfare
Geoff Winkler	Alaska Airlines	Alaska Air Airfare GBW	6/24/2022	580.58	Airfare
Geoff Winkler	Alaska Airlines	Alaska Air GoGo Internet	6/24/2022	5.25	Internet/Online Fees
John Hall	Alaska Airlines	Alaska Air Airfare JBH	6/24/2022	580.58	Airfare
John Hall	Alaska Airlines	Alaska Air Airfare JBH	6/24/2022	50.99	Airfare
John Hall	Alaska Airlines	Alaska Air Airfare JBH	6/24/2022	50.99	Airfare
Geoff Winkler	Alaska Airlines	Alaska Air GoGo Internet	6/25/2022	5.25	Internet/Online Fees
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/28/2022	51.75	Individual Meals
John Hall	Per Diem	J&J Consulting Per Diem	6/28/2022	51.75	Individual Meals
Milana Barkhanoy	Per Diem	J&J Consulting Per Diem	6/28/2022	51.75	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/29/2022	69.00	Individual Meals
John Hall	Per Diem	J&J Consulting Per Diem	6/29/2022	69.00	Individual Meals
Milana Barkhanoy	Per Diem	J&J Consulting Per Diem	6/29/2022	69.00	Individual Meals
Geoff Winkler	Per Diem	J&J Consulting Per Diem	6/30/2022	69.00	Individual Meals
Geoff Winkler	PACER	2Q 2022 PACER Charges	6/30/2022	74.30	Internet/Online Fees
John Hall	Per Diem	J&J Consulting Per Diem	6/30/2022	69.00	Individual Meals
John Hall	Extra Space Storage	Document/asset storage (prorated)	6/30/2022	37.50	Miscellaneous
John Hall	BGC	Online research per June payment	6/30/2022	133.33	Miscellaneous
Milana Barkhanoy	Per Diem	J&J Consulting Per Diem	6/30/2022	69.00	Individual Meals

SEC v. J&J Consulting Services, Inc. et al.
 Summary of Expenses of Receiver and Retained Personnel
 June 3, 2022 - June 30, 2022

Attachment 2

Incurring By	Payee	Item / Description	Date Incurred	Amount	Category
Total				\$ 16,863.59	

	<i>Geoff Winkler</i>	<i>John Hall</i>	<i>Amanda Deering</i>	<i>Milana Barkhanoy</i>	<i>Josh McGraw</i>	<i>Sam Parker</i>	<i>Total</i>
Airfare	2,411.93	682.56	588.59	-	584.20	1,206.17	5,473.45
Car Rental	761.05	-	-	-	-	-	761.05
Courier/Shipping/Freigh	-	-	-	-	-	-	-
Fuel	-	-	-	-	-	-	-
Hotel	2,350.00	-	2,315.34	-	-	2,097.84	6,763.18
Individual Meals	879.75	189.75	621.00	189.75	-	690.00	2,570.25
Internet/Online Fees	92.80	-	-	-	-	-	92.80
Miscellaneous	698.89	170.83	-	-	-	-	869.72
Office Supplies	-	-	-	-	-	-	-
Parking	123.00	-	-	-	-	-	123.00
Personal Car Mileage	-	-	-	-	-	-	-
Printing/Photocopying/ Stationery	-	-	-	-	-	-	-
Taxi	39.04	-	60.84	-	-	110.26	210.14
Total	7,356.46	1,043.14	3,585.77	189.75	584.20	4,104.27	16,863.59

SEC v. J&J Consulting Services, Inc. et al.
Receivership Estate Balance Sheet
June 3, 2022 - June 30, 2022

Attachment 3

Assets:		Liabilities:	
Cash ⁶	\$ 11,411,246	State/Federal Taxes ⁴	\$ -
Loan Receivable	\$ -	Property Taxes ⁴	\$ -
Marketable Securities	\$ -	Total Liabilities	\$ -
Real Property ¹	\$ 30,000,000		
Personal Property ¹	\$ 2,800,000	Claims:1	
Private Equity Investments ¹	\$ -	Investors ⁵	\$ -
Existing Litigation ^{2,3}	\$ -	Creditors ⁵	\$ -
Third Party Litigation ^{2,3}	\$ -	Total Claims	\$ -
Professional Liability Litigation ^{2,3}	\$ -		
Total Assets	\$ 44,211,246	Total Liabilities plus Claims	\$ -

1. Estimated value that is subject to further revision.

2. Probability of successful recovery unknown.

3. Value based on discounted present value and is under evaluation.

4. There is no known tax liability, but the Receiver is reviewing.

5. The total amount of investor and creditor claims is still under review.

6. The cash total includes \$3,812,304.74 from the Beasley Law Group IOLTA account. Access to these funds is restricted until the Receiver can perform a forensic accounting to determine how much, if any, client funds are in the account.

SEC v. J&J Consulting Services, Inc. et al.
Receiver's Cash Receipts and Disbursements
June 3, 2022 - June 30, 2022

Attachment 4

Beginning Balance of Cash in Receivership Estate on April 1, 2022	\$ -
Deposits:	\$ 11,411,246.24
Payments:	\$ (12,440.36)
Ending Balance of Cash in Receivership Estate on June, 2022	<u><u>\$ 11,398,805.88</u></u>

EXHIBIT “2”

**DECLARATION OF KARA B. HENDRICKS SUPPORT OF
AMENDED FIRST APPLICATION OF RECEIVER AND
RECEIVER'S PROFESSIONALS FOR ALLOWANCE AND
PAYMENT OF FEES AND COSTS FOR THE PERIOD
FROM JUNE 3, 2022 THROUGH JUNE 30, 2022**

Pages 1-27

UNITED STATES DISTRICT COURT

Case No. 2:22-cv-00612-CDS-EJY

EXHIBIT “2”

**DECLARATION OF KARA B. HENDRICKS IN SUPPORT
OF AMENDED FIRST APPLICATION OF RECEIVER AND
RECEIVER'S PROFESSIONALS FOR ALLOWANCE AND
PAYMENT OF FEES AND COSTS FOR THE PERIOD
FROM JUNE 3, 2022 THROUGH JUNE 30, 2022**

Pages 1-27

GREENBERG TRAUIG,
LLP
10845 Griffith Peak

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
3 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
4 **GREENBERG TRAUIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
6 Telephone: (702) 792-3773
Facsimile: (702) 792-9002

7
8 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
9 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
10 **SEMENZA KIRCHER RICKARD**
10161 Park Run Drive, Suite 150
11 Las Vegas, Nevada 89145
Telephone: (702) 835-6803
12 Facsimile: (702) 920-8669

13 *Proposed Attorneys for Receiver, Geoff Winkler*

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

14
15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE DISTRICT OF NEVADA**

17 SECURITIES AND EXCHANGE COMMISSION,

CASE NO. 2:22-cv-00612-CDS-EJY

18 Plaintiff,

19 vs.

20 MATTHEW WADE BEASLEY, *et al.*,

21 Defendants,

22 THE JUDD IRREVOCABLE TRUST, *et al.*,

23 Relief Defendants.

**DECLARATION OF KARA B.
HENDRICKS IN SUPPORT OF
AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S
PROFESSIONALS FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3,
2022 THROUGH JUNE 30, 2022**

24
25 I, Kara B. Hendricks, hereby declare as follows:

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

GREENBERG TRAUIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. I make this declaration in support of the Receiver’s amended application for approval of the fees and costs in connection with the above captioned matter.

3. I have personal knowledge of the following facts and am competent to testify thereto if necessary.

4. 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.

5. During the Application Period (June 3, 2002 through June 30, 2022), Greenberg Traurig LLP performed services on multiple projects including, among other things: investigating, analyzing, and drafting necessary documents to ensure that Receivership property was properly preserved and where feasible transferred to the Receiver; liaising and negotiating with counsel for Defendants and Relief Defendants for turnover of assets; obtaining certified copies of documents needed for 754 filings; researching real property ownership records relating to Defendants; preparing and filing motions to compel when assets were unlawfully retained; identifying and monitoring litigation proceedings which may impact receivership case; assisting the Receiver in obtaining documents and records from multiple sources; and responding to investor inquiries as received.

6. 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%. GT’s invoices for the Application Period are attached hereto as **Exhibit A**.

7. I hereby certify that I have read the Amended First Application of Receiver and Receiver’s Professional for Allowance and Payment of Fees and Costs for the Period from June 3, 2022 through June 30, 2022.

8. To the best of my knowledge, information and belief formed after reasonable inquiry, the 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.

1 9. All fees contained in the Application are based on the rates listed in GT’s fee
2 schedule, subject to increases disclosed to the SEC and approved by the Court prior to any such
3 increase. All fees contained in the Application are reasonable, necessary and commensurate with
4 the skill and experience required for the activity performed and are subject to Court approval.
5 Additionally, efforts were taken to avoid duplication of efforts and to undertake required tasks in
6 as efficient manner as possible, utilizing personnel best suited to the task consistent with the
7 complexity of the tasks required with the goal of providing high quality work that benefits the
8 receivership estate.

9 10. GT has not included in the amount for which reimbursement is sought the
10 amortization of the cost of any investment, equipment, or capital outlay (except to the extent that
11 any such amortization is included within the permitted allowable amounts set forth herein for
12 photocopies and facsimile transmission).

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

20 12. GT is sensitive to the feedback received from the SEC and this Court and have
21 implemented internal procedures to maximize the clarity of time entries moving forward.
22 Additionally, there the current Application Period, GT has reduced the amount it is requesting by
23 \$927.85 after counsel for the SEC brought duplicate entries to my attention.

24 //
25 //
26 //
27 //

GREENBERG TRAURIG,
LLP
10845 Griffith Peak

EXHIBIT A



Invoice No.: 1000035547
File No. : 209375.010100
Bill Date : July 19, 2022

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

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

Replaces Invoice 1000032281

	\$	98,900.50
Less Courtesy Discount:	\$	<u>(14,835.07)</u>
Total Fees:	\$	84,065.43

Expenses:

UPS Charges	14.69	
Information and Research	229.00	
Total Expenses:		<u>\$ 243.69</u>

Current Invoice:	\$	<u>84,309.12</u>
-------------------------	-----------	-------------------------

KBH:MR
Tax ID: 13-3613083



Invoice No.: 1000035547
File No. : 209375.010100

REMITTANCE ADVICE

PLEASE RETURN WITH YOUR PAYMENT
Note: Payment is Due 30 Days from Date of Invoice

CLIENT NAME: WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000035547*
BILLING PROFESSIONAL: Kara B. Hendricks

Current Invoice:	\$	84,309.12
Total Amount Due:	\$	84,309.12

FOR YOUR CONVENIENCE, WIRE TRANSFER FUNDS TO:

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

REFERENCE: **CLIENT NAME:** WINKLER, GEOFF
FILE NUMBER: 209375.010100
INVOICE NUMBER: 1000035547*
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

Wire fees may be assessed by your bank.

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

KBH:MR
Tax ID: 13-3613083

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 1

Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
06/03/22	Kyle Ewing	Begin reviewing and analyzing receivership order granted by J. Mahan in connection with analysis of scope of powers and responsibilities of the receiver; conference with G. Winkler and K. Hendricks re: the same	0.70
06/03/22	Kara B. Hendricks	Review and assess complaint and asset recovery and circulate key documents to team.	1.60
06/04/22	Kyle Ewing	Continue reviewing receivership order granted by J. Mahan and other pleadings to date (state court, receivership action, bankruptcy action) in connection with formulating plan for marshaling of assets; email communication with G. Winkler and K. Hendricks re: the same	1.90
06/04/22	Kara B. Hendricks	Review motion for receiver, related briefing and order; begin outline of assets identified in freeze order to develop next steps.	2.30
06/04/22	Jason Hicks	Review receivership appointment order, complaint, temporary restraining order briefing, and other docket items to become familiar with factual background and procedural status and assets for recovery.	1.50
06/05/22	Kyle Ewing	Continue reviewing pleadings to date (state court, receivership action, bankruptcy action) in order to identify and analyze potential receivership assets, including potential litigation claims; conference with American Fiduciary (G. Winkler and J. Hall), Allen Matkins (J. deCastillo and D. Naro), and K. Hendricks re: the same, as well as preparation for receiver taking control of known assets	5.80
06/05/22	Kara B. Hendricks	Call with G. Winkler and Receiver team to discuss case status, asset recovery, assignment and next steps; Coordinate with GT team on next steps to avoid duplicative efforts.	0.80
06/05/22	Kara B. Hendricks	Review email regarding Judd expense request and orders relating to the same in preparation for client discussions.	1.90
06/05/22	Cynthia L. Ney	Review court orders regarding relief given to defendants and update chart outlining same.	1.70
06/06/22	Kyle Ewing	Conference with G. Coder (FBI) and D. Ayala (state court receiver) re: known assets of receivership defendants and location of other potential receivership property (bank accounts, vehicles, etc.) in connection with further developing plan for receiver marshaling and taking possession of estate assets	1.60
06/06/22	Kyle Ewing	Telephonic conference with G. Winkler and B. Noell (counsel for J&J receivership entities) re: effect of receivership order on receivership property and information possessed by former CRO in connection	0.70

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 2

		with obtaining transfer of the same to the receiver; plan and prepare for the same	
06/06/22	Kyle Ewing	Telephonic conference with G. Winkler and T. Combs (counsel for the SEC) re: information possessed by SEC and relevant to receivership property and/or other duties within the receiver's mandate from the Court; plan and prepare for the same	1.30
06/06/22	Kyle Ewing	Review correspondence with Plaintiffs' counsel for lawsuits against third parties provided by G. Winkler in connection with formulating plan for obtaining agreement to avoid interference with receiver's mandate by the investor plaintiffs.	0.30
06/06/22	Kyle Ewing	Coordinate action items associated with marshalling/preserving receivership assets, including nationwide document search for litigation involving receivership property.	0.50
06/06/22	Kara B. Hendricks	Review emails and follow-up regarding communication with counsel re: assets and related issues.	0.30
06/06/22	Jason Hicks	Review communications amongst SEC and receiver regarding items to address this week	0.30
06/06/22	Cynthia L. Ney	Communications with K. Hendricks regarding property and asset research.	0.10
06/07/22	Kyle Ewing	Telephonic/email communications related to locating potential warehouse options for receiver in connection with storing/protecting receivership assets	0.40
06/07/22	Kyle Ewing	Review and provide comments on draft motion for OSC why order of contempt should not be entered against Judd/his attorney for refusing to turn over retainer funds; review court's prior decision in SEC v. Fujinaga in connection with the same	0.20
06/07/22	Kyle Ewing	Continue to plan for recovery of assets and effectuating stay of litigation/bankruptcy proceedings with K. Hendricks and J. DelCastillo (Allen Matkins) et al., and G. Winkler et al.; review email from G. Garman (J&J bankruptcy counsel) re: discovery items in the bankruptcy	0.70
06/07/22	Kyle Ewing	Finalize form letters to receivership defendants/counsel for receivership defendants in connection with collecting assets and procuring information in the possession of such defendants	0.30
06/07/22	Kyle Ewing	Telephonic conference with D. Baddley (SEC) re: plan for effectuating stay provisions in J. Mahan's receivership order w/r/t bankruptcy proceedings before J. Nakagawa; follow-up with K. Hendricks re: the same	0.70
06/07/22	Kara B. Hendricks	Follow-up with C. Ney regarding title searches for property receiver intends to collect.	0.20
06/07/22	Kara B. Hendricks	Review correspondence regarding BK issues and follow-up regarding next steps.	0.40
06/07/22	Kara B. Hendricks	Follow-up with C. Spaulding on motion for order to show cause and revise same.	0.30
06/07/22	Kara B. Hendricks	Request C. Ney assistance with preparation of notice letters to counsel.	0.40
06/07/22	Kara B. Hendricks	Research bankruptcy proceedings and analyze impact on recovery.	1.80
06/07/22	Kara B. Hendricks	Telephone call with G. Winkler and receivership team	0.70

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 3

Date	Name	Description	Hours
06/07/22	Kara B. Hendricks	and get updated on new information re: Meet with GT team to discuss next steps and division of work.	0.50
06/07/22	Kara B. Hendricks	Review and analyze additional background information and information received from counsel for defendants regarding assets and cooperation.	3.40
06/07/22	Jason Hicks	Meeting with GT team to strategize and formulate plan regarding bankruptcy case (and associated adversary proceedings), state court case (receivership), motions for order to show cause as to those individuals who refuse to turn over assets or documents, warehouse for storing seized assets (eg vehicles), potential motions to stay all parallel or related proceedings, and similar strategy and procedural issues.	1.00
06/07/22	Jason Hicks	Review correspondence from client regarding asset location.	0.20
06/07/22	Cynthia L. Ney	Preparation of form letter to defendants regarding receiver representation.	0.30
06/07/22	Cynthia L. Ney	Preparation of various letters to defendants with counsel regarding receivership.	2.80
06/07/22	Cynthia L. Ney	Finalize letters and forwarding same and receivership order to defendants' counsel.	1.40
06/07/22	Cynthia L. Ney	Review complaint and key pleadings to assist with letter to counsel.	0.70
06/07/22	Christian Spaulding	Evaluate court's ruling in SEC v. Fujinaga and draft argument related thereto in Application for Order to Show Cause.	1.30
06/07/22	Christian Spaulding	Evaluate prior correspondence and communications regarding funds currently held by various law firms and amounts therein.	1.30
06/07/22	Christian Spaulding	Consult with commercial real estate contacts regarding potential warehouse for lease to store assets.	0.60
06/07/22	Christian Spaulding	Evaluate relevant case law and revise draft language for Application for Order to Show Cause why Judd Should not be Held in Contempt	4.20
06/08/22	Kyle Ewing	Continue to plan for recovery of assets and effectuating stay of litigation/bankruptcy proceedings with K. Hendricks and J. DelCastillo (Allen Matkins) et al., and G. Winkler et al.; email communication with same group re: the same	0.60
06/08/22	Kyle Ewing	Conference with K. Hendricks, J. Hicks, and C. Ney re: further development of plan for recovery/protection of assets, including review of notice letters and plan for reaching additional individuals with receivership information/property; develop plan for approaching litigants/counsel in ancillary proceedings re: effect of stay	1.30
06/08/22	Kyle Ewing	Draft, review, and revise form letter to counsel for litigants in ancillary proceedings (other than bankruptcy); provide to K. Hendricks and G. Winkler for review and comments; coordinate preparation of specific letters to counsel for known litigants	0.80
06/08/22	Kyle Ewing	Follow-up telephonic/email communications related to locating potential warehouse options for receiver in connection with storing/protecting receivership assets	0.30

Invoice No.:	1000035547		Page 4
Matter No.:	209375.010100		
06/08/22	Kara B. Hendricks	Follow-up with GT team regarding status of pending projects and time lines.	0.30
06/08/22	Kara B. Hendricks	Prepare declarations in support of motion for order to show cause and update motion.	1.70
06/08/22	Kara B. Hendricks	Review emails and follow-up regarding Coinbase request.	0.30
06/08/22	Kara B. Hendricks	Work with C. Ney to finalize letters to counsel providing notice of order and requesting meeting.	1.10
06/08/22	Kara B. Hendricks	Follow-up regarding client document request.	0.40
06/08/22	Jason Hicks	Strategize regarding next steps with the GT team.	0.70
06/08/22	Jason Hicks	Communications with co-counsel regarding letters to defendants/their counsel and potential motions for order to show cause why sanctions should not be imposed for noncompliance with receivership order and review initial drafts of same.	0.50
06/08/22	Jason Hicks	Review SEC's list of consulting promoters and bank accounts currently known for purposes of identifying and seizing assets.	0.30
06/08/22	Cynthia L. Ney	Review pleadings and update party chart regarding litigation matters.	0.60
06/08/22	Cynthia L. Ney	Email communications with Duke Huish.	0.10
06/08/22	Cynthia L. Ney	Preparation of additional letters to defendants.	1.70
06/08/22	Cynthia L. Ney	Compile and forwarding of various materials to G.Winkler, D.Zaro and J.del Castillo.	0.50
06/08/22	Christian Spaulding	Evaluate complaint and related pleadings to glean necessary facts and events for motion to comp.	2.90
06/08/22	Christian Spaulding	Evaluate communications between counsel for Judd and receivership counsel and related facts pertaining to impending motion to compel or for order to show cause.	1.60
06/09/22	Kyle Ewing	Review correspondence from K. Anderson re: Judd funds held in trust; develop strategy for response and adjustments to motion for contempt based on the same	0.70
06/09/22	Kyle Ewing	Participate in meeting with G. Winkler and AFS team, J. delCastillo and Allen Matkins team, and GT team re: this weeks efforts to obtain cash and physical property and ongoing efforts to establish connections with Defendants' attorneys to facilitate further turnover of assets; follow-up with K. Hendricks re: the same.	0.60
06/09/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding vehicle pick-up.	0.20
06/09/22	Kara B. Hendricks	Review CarStorage agreement and provide comments.	0.60
06/09/22	Kara B. Hendricks	Respond to inquires regarding title information.	0.20
06/09/22	Kara B. Hendricks	Update declarations for motion for order to show cause based on comments received.	1.70
06/09/22	Kara B. Hendricks	Correspond with D. Zaro regarding 754 filings and provide certified copies requested.	0.40
06/09/22	Kara B. Hendricks	Forward information regarding potential warehouse space to G. Winkler.	0.40
06/09/22	Kara B. Hendricks	Review final letters to be sent to non represented defendants in receivership action and confer with C. Ney regarding the same; Review correspondence from K. Anderson and correspond with team on impact on Motion for OSC.	0.40
06/09/22	Jason Hicks	Strategy call with the Receiver and counsel to discuss and formulate plan regarding locating and securing	0.70

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 5

		assets and further strategizing with GT team re same as well as the motions to employ counsel and for an order to show cause regarding failure or refusal to turn over assets.	
06/09/22	Cynthia L. Ney	Preparation of additional letters to defendants.	1.30
06/09/22	Cynthia L. Ney	Communications with D.Edington and R.Kolesar regarding real property asset searches.	0.30
06/09/22	Christian Spaulding	Travel with receiver to gather vehicles from Beasley residence and transport to storage location.	3.80
06/10/22	Kyle Ewing	Conference with G. Winkler (and AFS team), J. delCastillo (and Allen Matkins team), and K. Hendricks re: motion for contempt against Judd/his attorney and strategy for approaching the same, as well as progress marshaling other assets this week, including airplane, rv, autos, and certain bank accounts	0.70
06/10/22	Kyle Ewing	Follow-up re: K. Anderson's refusal to turn over receivership property (retainer funds) with G. Winkler, J. delCastillo and D. Naro (Allen Matkins), and K. Hendricks; develop plan with respect to motion for contempt and approach to other defendants' counsel	0.80
06/10/22	Kara B. Hendricks	Participate in call with G. Winkler and receivership team regarding next steps.	0.60
06/10/22	Kara B. Hendricks	Review correspondence and information from D. Ayala.	0.50
06/10/22	Kara B. Hendricks	Correspond with G. Winkler regarding jet leasing.	0.40
06/10/22	Kara B. Hendricks	Work with E. Esobar-Gaddi to finalize exhibits for motion.	0.40
06/10/22	Kara B. Hendricks	Update declarations and Motion to compel/OSC and finalize same.	1.40
06/10/22	Kara B. Hendricks	Discussion with G. Winkler regarding OSC motion and approach.	0.60
06/10/22	Kara B. Hendricks	Telephone call to D. Wadley.	0.30
06/10/22	Kara B. Hendricks	Correspond with team regarding motion for OSC and Anderson communication.	0.30
06/10/22	Jason Hicks	Review information received today from State Court Receiver (Dan Ayala) listing known Beasley, Judd, and Jager assets.	0.40
06/10/22	Jason Hicks	Review correspondence to counsel for Judd (Kevin Anderson) re: refusal to turnover assets.	0.10
06/10/22	Jason Hicks	Call with Receiver to discuss today's progress on identifying and recovering assets, in particular bank accounts, state court receiver information, individual's holdings of funds, as well moving for an order to show cause against those who are not turning over funds, and updates on communications with additional investors and promoters.	0.70
06/10/22	Jason Hicks	Review correspondence from Oberheiden PC regarding its possession of Receivership funds (Judd).	0.10
06/10/22	Jason Hicks	Strategize with Receiver and legal team re: what to do about the jet.	0.10
06/10/22	Jason Hicks	Review/revise further draft of motion for order to show cause directed at counsel who are refusing to turn over receivership money.	0.80
06/10/22	Jason Hicks	Call with Receiver to discuss J&J assets.	0.20
06/10/22	Cynthia L. Ney	Research regarding JL2 Investments.	0.30

Invoice No.:	1000035547		Page 6
Matter No.:	209375.010100		
06/10/22	Cynthia L. Ney	Finalize and forwarding of letters to counsel in ancillary proceedings.	1.80
06/10/22	Cynthia L. Ney	Preparation of various letters in ancillary proceedings.	2.60
06/10/22	Cynthia L. Ney	Prepare form letter to counsel in ancillary proceedings and communications with K.Ewing regarding same.	0.40
06/11/22	Jason Hicks	Review Fabian VanCott (Judd counsel) response to order appointing receiver (ECF 92)	0.10
06/13/22	Kyle Ewing	Coordinate drafting and mailing of follow-up letters to counsel for non-Judd defendants re: compliance with the Court's turnover letter	0.30
06/13/22	Kyle Ewing	Telephonic conference with G. Winkler (and AFS team) and J. delCastillo (and Allen Matkins team) re: plan for marshaling and obtaining assets and bank account information, including communication with attorneys for individual defendants	0.50
06/13/22	Jason Hicks	Legal research on issues surrounding receivership defendants' counsel assertions that they are entitled to retain monies to pay for their defense.	0.30
06/13/22	Jason Hicks	Review update on collective efforts by Garman Turner Gordon, Province, and the CRO (BK case) and strategize with team on same.	0.50
06/13/22	Jason Hicks	Communications with Marc Cook.	0.10
06/13/22	Jason Hicks	Legal research on issues surrounding receivership defendants' counsel assertions that they are entitled to retain monies to pay for their defense.	0.50
06/13/22	Christian Spaulding	Confer with team regarding follow ups to be made to counsel who have not yet responded to June 7 letters.	0.20
06/14/22	Kyle Ewing	Draft, review, and revise form follow-up letter to counsel for attorneys; finalize the same in preparation for routing to each defendant's counsel	1.20
06/14/22	Kyle Ewing	Telephonic conference with G. Winkler (and AFS team), J. delCastillo (and Allen Matkins team), and J. Hicks re: ongoing efforts to secure compliance of receivership defendants and (former) CRO with receivership order; develop strategy for securing receivership assets possessed by defendants and their agents	0.60
06/14/22	Jason Hicks	Review notices of appearances and the draft letter following up with attorneys who are holding receivership assets, revise same, review matrix to identify who we need to send these follow up letters to, and strategize with GT team regarding same and calls with Receiver on the same.	1.50
06/14/22	Cynthia L. Ney	Finalize letters and email to various defendants' counsel.	0.10
06/14/22	Cynthia L. Ney	Editing of follow-up form letter to defendants.	0.30
06/14/22	Cynthia L. Ney	Communications with K.Ewing, J.Hicks and G.Winkler.	0.40
06/15/22	Jason Hicks	Communications from counsel for ACAC LLC regarding asset collection/turnover activities and with Receiver regarding same.	0.40
06/15/22	Jason Hicks	Call with Garrett Ogata (criminal attorney for Beasley) and discussion regarding receivership order and turnover of assets held by Ogata and follow up with Receiver on same and revise letter to Ogata co-counsel	0.80

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 7

		(Draskovich) demanding ID and turnover of assets held.	
06/15/22	Jason Hicks	Call with Receiver and team to discuss status and next steps.	0.30
06/15/22	Jason Hicks	Communications from Oberheiden firm (Judd criminal defense attorneys) regarding their funds held and review their notice / certification to the court re: same.	0.20
06/15/22	Jason Hicks	Communications from counsel for ACAC LLC regarding asset collection/turnover activities and with Receiver regarding same.	0.20
06/15/22	Cynthia L. Ney	Review various pleadings and charts and preparation of listing of real property assets.	1.40
06/15/22	Cynthia L. Ney	Communications with J.Hicks.	0.20
06/15/22	Cynthia L. Ney	Prepare additional follow up letters to defendants and forwarding of same.	1.30
06/15/22	Cynthia L. Ney	Communications with R.Kolesar, First American Title regarding real property.	0.20
06/15/22	Cynthia L. Ney	Review various pleadings and charts and preparation of listing of real property assets.	1.40
06/15/22	Cynthia L. Ney	Communications with J.Hicks.	0.20
06/15/22	Cynthia L. Ney	Prepare additional follow up letters to defendants and forwarding of same.	1.30
06/16/22	Kyle Ewing	Participate in conference with G. Winkler (AFS), Josh delCastillo (Allen Matkins), and teams re: successful seizure of Judd Rolls Royce and Skyarc property, ongoing discussions with counsel for various defendants, and receivership assets identified to date.	0.40
06/16/22	Jason Hicks	Call with Robert Draskovich -one of Beasley's criminal attorneys- in response to our letter.	0.10
06/16/22	Jason Hicks	Call with the Receiver to discuss SEC collection of information from the banks.	0.40
06/16/22	Jason Hicks	Strategize with Receiver re: the letter responses.	0.60
06/16/22	Jason Hicks	Attention to potential warehouse for storing seized assets -eg, RV, cars, etc- pending liquidation.	0.30
06/16/22	Jason Hicks	Correspondence from Peter Christiansen regarding assets/turnover and review his attachments.	0.40
06/16/22	Jason Hicks	Communications from Louis Palazzo -Shane Jager and Stirling- regarding same.	0.10
06/16/22	Cynthia L. Ney	Research regarding lawsuits regarding all defendants and preparation of summary of possibly relevant matters.	2.70
06/16/22	Cynthia L. Ney	Email communications with K.Ewing regarding outstanding matters.	0.20
06/17/22	Kyle Ewing	Begin drafting form letter to nonparty 'promoter' defendants identified by the SEC; review receivership order in connection with the same.	0.70
06/17/22	Jason Hicks	Communications with R. Draskovich office, attorney for Beasley in the criminal firearm case, re: turnover order.	0.10
06/17/22	Jason Hicks	Call with Receiver and L. Palazzo, attorney for Shane Jager and Stirling, re: turnover order.	0.50
06/17/22	Jason Hicks	Call with Receiver and Dan Hill, attorney for ACAC LLC, re: turnover order.	0.30
06/17/22	Jason Hicks	Call with Receiver and receivership team re: week's/day's progress on asset identification and	0.30

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 8

		collection and next steps.	
06/17/22	Jason Hicks	Further emails/communications with Receiver and team re: same.	0.60
06/17/22	Jason Hicks	Review Shane Jager schedule of assets.	0.20
06/17/22	Cynthia L. Ney	Preparation of chart of real property, including title holders and value.	1.40
06/17/22	Cynthia L. Ney	Communications with team regarding same.	0.20
06/17/22	Cynthia L. Ney	Perform searches on real property listed as assets for various defendants and pull grant deeds.	2.60
06/20/22	Kyle Ewing	Review and analyze certified statements received last week from various defendants under receivership order; analyze next steps for identifying and obtaining all assets identified and subject to turnover under the court's order; review notice of agenda in preparation for tomorrow's hearing before the bankruptcy judge.	0.60
06/20/22	Kara B. Hendricks	Review Judd's statement regarding receivership and related exhibits.	0.30
06/20/22	Kara B. Hendricks	Review updates from team and coordinate division of work.	0.30
06/20/22	Kara B. Hendricks	Follow-up regarding emails on potential space to lease.	0.20
06/20/22	Kara B. Hendricks	Review emails from Allen Matkins firm to coordinate efforts.	0.30
06/20/22	Kara B. Hendricks	Review email from D. Shief regarding coinbase data.	0.20
06/20/22	Kara B. Hendricks	Review emails from G. Winkler regarding recovery efforts.	0.20
06/20/22	Kara B. Hendricks	Follow-up with GT team regarding multiple asset filings and correspondence from counsel regarding scheduling meetings and next steps.	0.10
06/20/22	Jason Hicks	Strategize with GT team re: bankruptcy issues, asset collection status, and next steps.	0.40
06/21/22	Kara B. Hendricks	Follow-up with G. Winkler regarding information received from J. Jongeward and next steps.	0.30
06/21/22	Kara B. Hendricks	Call with J. Jongeward and G. Winkler.	0.20
06/21/22	Kara B. Hendricks	Review information regarding JL2 Investments and J. Jongeward for call with J. Jogeward.	0.10
06/21/22	Kara B. Hendricks	Correspond with J. Jongeward regarding JL2 Investments.	0.30
06/21/22	Kara B. Hendricks	Confer with G. Winkler regarding meetings with defendants.	0.20
06/21/22	Kara B. Hendricks	Correspond with L. Amaningo regarding Seybert and related follow-up.	0.30
06/21/22	Kara B. Hendricks	Review correspondence from J. Watt regarding subpoena.	0.10
06/21/22	Kara B. Hendricks	Review updated property list and correspond with C. Ney regarding same.	0.20
06/21/22	Jason Hicks	Review JL2 Investment Log.	0.10
06/21/22	Jason Hicks	Communications from defendants/relief defendants' counsel regarding calls, property visits, and various asset location and turnover issues.	0.60
06/21/22	Jason Hicks	Communications re Draskovich, Beasley's criminal attorney, re turnover issues.	0.20
06/21/22	Cynthia L. Ney	Research regarding JL2 Investments assets and communications with K. Hendricks regarding same.	0.30
06/21/22	Cynthia L. Ney	Communications with team regarding same.	0.10
06/21/22	Cynthia L. Ney	Pull additional property data and deeds.	1.90

Invoice No.:	1000035547		Page 9
Matter No.:	209375.010100		
06/22/22	Kyle Ewing	Review asset lists and correspondence related to the receiver's effort to recover known assets of the receivership defendants; develop plan for identifying unknown or hidden assets and investigating other property and claims properly belonging to the receivership estate.	1.40
06/22/22	Kara B. Hendricks	Update task list and follow-up with team regarding same.	0.60
06/22/22	Kara B. Hendricks	Evaluate case documents relating to ACAC and follow-up with J. Hicks on discussions with counsel.	0.80
06/22/22	Kara B. Hendricks	Review emails and follow-up regarding turn over efforts for relief defendants.	0.20
06/22/22	Kara B. Hendricks	Review correspondence and tasks list from J. del Castillo regarding division of work and follow-up with GT team.	0.20
06/22/22	Jason Hicks	Call to Garrett Ogata -criminal attorney for Beasley- regarding assets he is holding and communications with Receiver regarding same.	0.20
06/22/22	Jason Hicks	Strategize with receivership team regarding numerous outstanding tasks, e.g., draft report regarding bankruptcy matters, motions for authority to sell real and personal property, title issues and recordation, receivership discovery plan, follow up letter to Ogata, etc..	1.90
06/22/22	Jason Hicks	Call with Robert Draskovich -another of Beasley's criminal attorneys- regarding assets and turnover and update Receiver regarding same.	0.40
06/22/22	Cynthia L. Ney	Review recent email communications.	0.30
06/22/22	Cynthia L. Ney	Email communications with team regarding outstanding tasks.	0.30
06/23/22	Kyle Ewing	Conference with K. Hendricks re: plan for pursuing records, including potential subpoenas from conflicts counsel; continued efforts to obtain turnover of various assets, including legal strategy for seeking those assets if held by relief defendants (as opposed to receivership defendants); follow-up with G. Winkler.	0.80
06/23/22	Kara B. Hendricks	Correspond with J. Hicks regarding ACAC issues.	0.30
06/23/22	Kara B. Hendricks	Review prior communication relating to Humphrey assets and forward to client.	0.30
06/23/22	Kara B. Hendricks	Participate in call from P. Christiansen, K. Works and G. Winkler regarding Humphrey assets.	0.30
06/23/22	Kara B. Hendricks	Respond to email from J. Edwards regarding Beasley.	0.10
06/23/22	Kara B. Hendricks	Follow-up with C. Ney regarding asset recovery list.	0.10
06/23/22	Kara B. Hendricks	Email L. Manigo re Triple Threat Basketball.	0.10
06/23/22	Kara B. Hendricks	Update real property list and circulate to team.	1.10
06/23/22	Kara B. Hendricks	Call with G. Winkler and L. Manigo re Danny Seybert and Rocking Horse.	0.40
06/23/22	Kara B. Hendricks	Respond to C. Ney inquiries and identify follow-up letters to be sent to defendants and property issues.	0.40
06/23/22	Kara B. Hendricks	Confer with J. del Castillo regarding project status.	0.40
06/23/22	Kara B. Hendricks	Follow-up with K. Ewing regarding division of work and next steps and develop task list.	0.50
06/23/22	Jason Hicks	Revise letter to Ogata -Beasley criminal attorney- and discuss with receiver regarding asset turnover -Bentley- and potential motion practice.	0.20

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 10

06/23/22	Jason Hicks	Communications from Washington counsel -Jon Edwards- who represents investors regarding the case.	0.10
06/23/22	Jason Hicks	Review communications re: Danny S. assets.	0.10
06/23/22	Jason Hicks	Review updated list of defendant assets and estimated values and review communications re: Lance Maningo -attorney for Triple Threat.	0.10
06/23/22	Jason Hicks	Strategize with team re: ACAC response and follow up call re asset turnover.	0.20
06/23/22	Jason Hicks	Strategize with team re: ACAC response and follow up call re asset turnover.	0.20
06/23/22	Cynthia L. Ney	Meet with K.Hendricks regarding outstanding tasks and questions.	0.30
06/23/22	Cynthia L. Ney	Review recent email communications.	0.20
06/24/22	Kara B. Hendricks	Follow-up with G. Winkler regarding R. Tanner.	0.10
06/24/22	Kara B. Hendricks	Call with J. Edwards.	0.20
06/24/22	Kara B. Hendricks	Call from M. Cook re: Murphy Knowledge.	0.40
06/24/22	Kara B. Hendricks	Prepare update from G. Winkler with new information and contact information.	0.70
06/24/22	Kara B. Hendricks	Correspond with G. Winkler regarding pending issues and follow-up with M. Cook.	0.30
06/24/22	Kara B. Hendricks	Review and approve follow-up letters to BJ holdings, Monty Crew and A. Alberto and work with C. Ney to finalize same.	0.20
06/24/22	Kara B. Hendricks	Follow-up regarding additional cases involving S. Jager.	0.10
06/24/22	Kara B. Hendricks	Request C. Spaulding's assistance with preparation of motion to compel turnover of Bentley and provide background information need for same.	0.20
06/24/22	Jason Hicks	Review correspondence to/from attorneys for defendants and for investors regarding asset identification, compliance with turnover order.	0.30
06/24/22	Cynthia L. Ney	Preparation of various follow up letters to defendants.	1.10
06/24/22	Cynthia L. Ney	Research regarding Shane Jager as executor to Dean Haze estate and communications to team regarding same.	0.50
06/24/22	Cynthia L. Ney	Research alternative address for A.Alberto.	0.20
06/24/22	Cynthia L. Ney	Communications with K. Hendricks regarding tasks.	0.20
06/24/22	Christian Spaulding	Confer with team regarding need for Motion to Compell turnover of vehicle transferred to counsel for Beasley.	0.20
06/25/22	Kyle Ewing	Formulate strategy for approaching motion for order to show cause in light of Judd/counsel's failure to oppose the motion.	0.30
06/25/22	Kara B. Hendricks	Review order to asses Coinbase questions regarding assets disclosure and follow-up with G. Winkler.	0.20
06/25/22	Kara B. Hendricks	Update list of contacts with defendants and relief defendants and correspond with G. Winkler regarding same.	1.00
06/25/22	Kara B. Hendricks	Review motion to dismiss filed by Humphries and follow-up.	0.20
06/25/22	Jason Hicks	Review summary of receiver's conversations with defendants regarding turnover agreements.	0.10
06/25/22	Jason Hicks	Review Oberheiden amended certified statement per court's order, on behalf of Judd.	0.10
06/25/22	Jason Hicks	Review correspondence with Coinbase regarding	0.20

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 11

06/26/22	Jason Hicks	turnover of accounts and issue with receivership appointment order and advise receiver on same. Strategize and formulate plan regarding \$371k held by Oberheiden firm (Judd), assets held by Ogata (Beasley), Roland Tanner, and Kamille Dean (Judd).	0.40
06/27/22	Kyle Ewing	Preliminary review of Judd's motion to bar the receiver from taking custody of his funds; form strategy for responding to the same; research law in connection with the same.	0.70
06/27/22	Kara B. Hendricks	Review correspondence with Coinbase.	0.10
06/27/22	Kara B. Hendricks	Work with research department to pull cases cited in motion.	0.20
06/27/22	Kara B. Hendricks	Review correspondence from J. del Castillo regarding new motion and next steps.	0.10
06/27/22	Kara B. Hendricks	Review Motion to Clarify order appointing receiver and for release of funds or motion to withdraw and follow-up with client regarding preparation of response.	0.20
06/27/22	Kara B. Hendricks	Follow-up regarding motion to compel re: Bentley from Ogata.	0.10
06/27/22	Kara B. Hendricks	Follow-up with M. Pham regarding contact with counsel.	0.10
06/27/22	Kara B. Hendricks	Review and provide comments regarding Baker Tilley agreement.	0.20
06/27/22	Kara B. Hendricks	Correspond with L. Maningo.	0.10
06/27/22	Kara B. Hendricks	Review update from J. del Castill regarding communication with Judd and counsel.	0.10
06/27/22	Kara B. Hendricks	Review updated information regarding service of motion to compel and follow-up with C. Spaulding regarding non-opposition and draft order.	0.20
06/27/22	Jason Hicks	Strategize with GT team re Ogata turnover issue and potential motion to compel/order to show cause.	0.40
06/27/22	Jason Hicks	Strategize with GT team regarding Maningo turnover and forthcoming motions to compel/sell property.	0.10
06/27/22	Jason Hicks	Review NV Supreme Court's order on Beasley license and strategize with GT team insofar as implications concerning that decision to Beasley IOLTA account and receivership obligations.	0.40
06/27/22	Christian Spaulding	Evaluate relevant case law regarding court's authority to compel compliance with orders applicable to this matter. To be used in Motion to compel or order to show cause why counsel for Beasley should not be held in contempt.	2.90
06/27/22	Christian Spaulding	Draft Motion to Compel or Alternative Motion for Order to Show Cause why Garrett Ogata Should not be Held in Contempt.	6.20
06/28/22	Kyle Ewing	Review and provide comments/edits to notice of non-opposition and proposed order on the receiver's motion for order to show cause or compel turnover of funds deposited with Judd's attorneys.	0.30
06/28/22	Kyle Ewing	Participate in team meeting with GT team, G. Winkler (AFS), and J. delCastillo (Allen Matkins).	0.80
06/28/22	Kara B. Hendricks	Review and revise draft motion regarding Ogata and follow-up with C. Spaulding regarding same.	0.40
06/28/22	Kara B. Hendricks	Provide C. Spaulding information to update Ogata motion to compel and additional guidance regarding	0.20

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 12

		same.	
06/28/22	Kara B. Hendricks	Follow-up with J. delCastillo regarding draft sales motions.	0.20
06/28/22	Kara B. Hendricks	Participate in call to discuss case status and strategy.	0.80
06/28/22	Kara B. Hendricks	Incorporate comments on notice and order.	0.10
06/28/22	Kara B. Hendricks	Review and revise draft notice of non-opposition and proposed order and provide to client for review and comment.	0.90
06/28/22	Kara B. Hendricks	Correspond with L. Maningo.	0.10
06/28/22	Kara B. Hendricks	Begin preparation of response to Judd motion to clarify including introduction and cross referencing to prior filings show assets and wrong doing.	1.90
06/28/22	Kara B. Hendricks	Correspond with C. Spaulding regarding research.	0.10
06/28/22	Jason Hicks	Strategize with GT team and Receiver regarding Ogata (Beasley) and turnover obligations.	0.50
06/28/22	Cynthia L. Ney	Conversion of Judd Statement to excel and calculation of total assets.	0.30
06/28/22	Cynthia L. Ney	Communications with K.Hendricks regarding same.	0.10
06/28/22	Christian Spaulding	Draft notice of non-opposition to Motion to Compel or Motion for Order to Show Cause why Judd Should not be Held in Contempt and proposed order granting the same.	1.50
06/28/22	Christian Spaulding	Update and revise draft of Motion to Compel Ogata and declarations in support with new information provided by client.	2.00
06/29/22	Kara B. Hendricks	Review email from K. Anderson regarding opposition to motion to compel and follow-up with G. Winkler regarding requested extension.	0.20
06/29/22	Kara B. Hendricks	Update motion based on G. Winkler comments.	0.30
06/29/22	Kara B. Hendricks	Telephone call with G. Winkler regarding turnover and withdrawing motion to compel and update team.	0.20
06/29/22	Kara B. Hendricks	Calls with K. Anderson regarding FabianVanCott turnover x2.	0.30
06/29/22	Kara B. Hendricks	Call with M. Cianfrani and send follow-up email.	0.30
06/29/22	Kara B. Hendricks	Call with Marc Cook and G. Winkler and send follow-up email.	0.70
06/29/22	Kara B. Hendricks	Email SEC counsel regarding response to Judd Motion.	0.10
06/29/22	Kara B. Hendricks	Request C. Spaulding assistance with research and preparation of response to Judd Motion and provide prior pleadings.	0.30
06/29/22	Kara B. Hendricks	Correspond with K. Anderson.	0.20
06/29/22	Kara B. Hendricks	Revise motion to compel Ogata and supporting declarations and follow-up with J. Hicks and G. Winkler regarding finalizing same.	1.10
06/29/22	Jason Hicks	Review and revise declaration in support of motion to compel re: Ogata (Beasley criminal attorney) and the Bentley, and strategize with K Hendricks re same.	0.50
06/29/22	Christian Spaulding	Evaluate Motion to Clarify Receivership Order filed by Judd and related briefs to determine points of opposition.	2.30
06/29/22	Christian Spaulding	Revise and finalize draft of Motion to Compel or in the Alternative Motion for Order to Show Cause why Garrett Ogata should not be held in contempt and related declarations.	0.70
06/29/22	Christian Spaulding	Review final versions of Motion to compel Re: Ogata	0.30

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 13

06/30/22	Kyle Ewing	and coordinate filing of the same. Review/analyze K. Anderson's email letter re: turnover of J&J entity documents; draft analysis/proposed response for receiver; email communication with K. Hendricks and J. Hicks re: the same	0.30
06/30/22	Kara B. Hendricks	Respond to email from K. Anderson regarding stipulation and wire instructions and request team provide wire instructions.	3.30
06/30/22	Jason Hicks	Review communications from Fabian Vancott attorneys (Judd) regarding their failure to oppose our motion to compel, their request to stipulate to more time for them to do so, and their draft stip/motion on same, make edits on same, and strategize with team on next steps in that regard.	3.30
06/30/22	Cynthia L. Ney	Forwarding of secure file transfer request to M. Cianfrani, Coinbase.	1.00
06/30/22	Christian Spaulding	Strategize w/ K. Hendricks regarding opposition to Judd's Motion to Clarify.	0.30
Total Hours:			179.40

TIMEKEEPER SUMMARY FOR TASK CODE GW001.

ASSET ANALYSIS AND RECOVERY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Kara B. Hendricks	52.60	565.00	29,719.00
Jason Hicks	27.40	425.00	11,645.00
Kyle Ewing	29.80	400.00	11,920.00
Christian Spaulding	32.30	375.00	12,112.50
Cynthia L. Ney	37.30	295.00	11,003.50
Total:	179.40		\$ 76,400.00

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Discounted Rate</u>	<u>Discounted Amount</u>
Kara B. Hendricks	52.60	480.25	25,260.64
Jason Hicks	27.40	361.75	9,898.43
Kyle Ewing	29.80	340.00	10,132.00
Christian Spaulding	32.30	318.75	10,295.67
Cynthia L. Ney	37.30	250.75	9,353.10
Discounted Total:	179.40		\$ 64,939.84

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 14

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
06/03/22	Kara B. Hendricks	Discuss receiver appoint with G. Winkler including anticipated asset recovery.	0.80
06/04/22	Cynthia L. Ney	Preparation of chart of party and non-party contacts.	1.30
06/04/22	Cynthia L. Ney	Compilation of filed pleadings materials and provide same to team.	0.40
06/05/22	Kara B. Hendricks	Review underlying complaint and materials from bankruptcy proceeds to asses next steps based on receiver appointment.	1.40
06/05/22	Cynthia L. Ney	Pull key court documents and provide same to team.	0.40
06/06/22	Kyle Ewing	Review draft motion for order allowing receiver to employ counsel, provide comments/edits on the same to C. Spaulding.	0.20
06/06/22	Cynthia L. Ney	Electronic organization of client materials.	0.70
06/06/22	Cynthia L. Ney	Communications with K.Hendricks and K.Ewing regarding tasks.	0.20
06/06/22	Cynthia L. Ney	Preparation of chart regarding research on lawsuits involving defendants.	0.20
06/07/22	Kara B. Hendricks	Telephone call with Allen Matkins regarding pro hac forms.	0.30
06/07/22	Kara B. Hendricks	Prepare notice for bankruptcy proceedings of representation and order.	0.60
06/07/22	Kara B. Hendricks	Revise notice and representation order.	0.80
06/07/22	Kara B. Hendricks	Follow-up with E. Escobar-Gaddi regarding certified copies of complaint and receivership order.	0.40
06/07/22	Jason Hicks	Review correspondence from client regarding asset location; review correspondence from GTG (counsel for CRO in BK proceedings) and related information/tasks as they relate to the BK status and next steps.	0.70
06/07/22	Cynthia L. Ney	Research regarding bankruptcy adversary proceeding and pull dockets for each proceeding.	1.80
06/07/22	Cynthia L. Ney	Various communications with K.Hendricks and K.Ewing.	0.40
06/07/22	Christian Spaulding	Evaluate Omnibus response to documents filed by Debtors	0.30
06/07/22	Christian Spaulding	Meeting with team regarding background of case, firm role, and initial steps to be taken.	1.00
06/08/22	Kara B. Hendricks	Finalize bankruptcy notice/pleading request and notice of BK order.	0.70
06/08/22	Kara B. Hendricks	Correspond with M. Pham regarding bankruptcy issues.	0.50
06/08/22	Kara B. Hendricks	Update letter to counsel in ancillary proceedings.	0.40
06/08/22	Kara B. Hendricks	Follow-up regarding appointment motion and provide C. Spaulding background info.	0.60
06/08/22	Kara B. Hendricks	Call with G. Winkler and team to discuss new case developments and next steps.	0.60
06/08/22	Kara B. Hendricks	Telephone call with M. Gall regarding background information prior to receivership.	0.50
06/08/22	Cynthia L. Ney	Preparation of listing of defendants not represented by counsel and communications with K.Hendricks	0.40

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 15

		regarding same.	
06/08/22	Cynthia L. Ney	Review pleadings and update party chart with bankruptcy and adversary matters.	2.90
06/08/22	Cynthia L. Ney	Team meeting regarding tasks and update charts and compile and forward materials to G.Winkler for review.	1.30
06/08/22	Christian Spaulding	Gather information and draft Motion to Employ counsel.	4.60
06/09/22	Kyle Ewing	Continue coordinating service of and reviewing letters to counsel re: the Court's stay of ancillary proceedings; follow-up with C. Ney and K. Hendricks re: the same	0.40
06/09/22	Kyle Ewing	Revise/edit K. Hendrick's draft letter to US Attorney's office; email communication re: the same	0.20
06/09/22	Kara B. Hendricks	Prepare letter to Dan Schiess requesting documents from US Attorneys office.	0.40
06/09/22	Kara B. Hendricks	Incorporate Allen Matkins revisions to motion to employ.	0.40
06/09/22	Kara B. Hendricks	Prepare declarations in support of motion to employ.	0.40
06/09/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding employment motion and review and revise same.	0.50
06/09/22	Kara B. Hendricks	Follow-up with G. Winker regarding certified copies of court documents and requested correspondence and brief meeting to discuss.	0.70
06/09/22	Cynthia L. Ney	Update chart adding ancillary proceedings and distribute to team and review filings.	2.20
06/09/22	Cynthia L. Ney	Review and edit motion to employ counsel, declarations of K.Hendricks and compilation of supporting exhibits.	1.60
06/09/22	Cynthia L. Ney	Compile and provide materials to team for review.	0.50
06/09/22	Christian Spaulding	Continue and finalize draft of Motion to Employ Counsel.	2.50
06/10/22	Kara B. Hendricks	Follow-up with E. Escobar-Gaddi regarding filing motion.	0.30
06/10/22	Kara B. Hendricks	Follow up with A. Flintz regarding bankruptcy filing.	0.20
06/10/22	Kara B. Hendricks	Finalize motion to employ.	1.30
06/10/22	Kara B. Hendricks	Correspond with Allen Matkins firm regarding pro hac issues.	0.20
06/10/22	Kara B. Hendricks	Reach out to J. Rikkard regarding local counsel assistance.	0.30
06/10/22	Cynthia L. Ney	Compilation of materials for team's review.	0.50
06/10/22	Cynthia L. Ney	Electronic case organization.	0.60
06/10/22	Cynthia L. Ney	Review recent email communications; communications with team regarding outstanding tasks.	0.40
06/13/22	Kyle Ewing	Research law re: attorneys' claims that they may retain receivership funds for the purpose of providing fees for a legal defense; email communication with J. delCastillo (Allen Matkins) and G. Winkler re: the same	0.30
06/14/22	Kyle Ewing	Revise and finalize notices of appearance in bankruptcy matters in preparation for filing the same	0.30
06/14/22	Cynthia L. Ney	Review SEC and bankruptcy court matters and obtain updated dockets.	0.80
06/14/22	Cynthia L. Ney	Update chart.	0.90
06/14/22	Cynthia L. Ney	Preparation of numerous demand letters to defendants and ancillary proceeding participants.	2.60
06/15/22	Cynthia L. Ney	Update chart.	0.90

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 16

06/16/22	Cynthia L. Ney	Update chart with parties and counsel information on SEC list not yet parties.	1.20
06/17/22	Jason Hicks	Communications from SEC regarding bankruptcy cases and call with SEC counsel/Receiver regarding same.	0.60
06/20/22	Kara B. Hendricks	Follow-up regarding BK adversary questions.	0.30
06/21/22	Kara B. Hendricks	Review notice of agenda for BK hearings and follow-up with J. Hicks and K Ewing regarding same.	0.80
06/21/22	Kara B. Hendricks	Preliminary research regarding new judge and circulate to team.	0.20
06/21/22	Kara B. Hendricks	Confer with J. Hicks regarding upcoming BK hearing coverage and divisions of work.	0.40
06/21/22	Jason Hicks	Review notice of agenda for today's BK hearing.	0.20
06/21/22	Jason Hicks	Attention to Judge Mahan's recusal order.	0.30
06/21/22	Jason Hicks	Attend bankruptcy hearing.	0.10
06/21/22	Cynthia L. Ney	Update property owned chart.	1.60
06/22/22	Kara B. Hendricks	Follow-up regarding records from the US attorneys office.	0.10
06/22/22	Kara B. Hendricks	Review and revise employ SKR employment and correspond with J. Rickard regarding same.	0.50
06/22/22	Cynthia L. Ney	Update chart regarding contact with defendants and their counsel and prepare listing of outstanding issues involving same.	1.80
06/22/22	Cynthia L. Ney	Electronic case organization.	0.50
06/23/22	Cynthia L. Ney	Compile and forward materials to K.Hendricks for review.	0.30
06/24/22	Kyle Ewing	Communication with G. Winkler re: contacting chambers of newly reassigned judge (J. Silva)	0.10
06/24/22	Kara B. Hendricks	Review and evaluate pleadings from class action.	0.30
06/24/22	Cynthia L. Ney	Research regarding Nevada Housing Solutions and relief granted by court.	0.20
06/24/22	Cynthia L. Ney	Update chart of parties and data.	0.30
06/25/22	Jason Hicks	Review C Humphries and CJ Investments Motion to Dismiss.	0.20
06/27/22	Kyle Ewing	Review order from Nevada Ethics Board re: Beasley's conduct and his IOLTA account; conduct further research re: disciplinary proceedings against Beasley	0.40
06/27/22	Kara B. Hendricks	Review Nevada housing solutions stipulation and follow-up with C. Ney.	0.10
06/27/22	Kara B. Hendricks	Update G. Winkler.	0.20
06/27/22	Kara B. Hendricks	Telephone call to D. Hooge regarding Beasley order and send follow-up email.	0.30
06/27/22	Kara B. Hendricks	Review Beasley Order regarding law license and accounts.	0.10
06/27/22	Cynthia L. Ney	Email electronic case organization.	0.90
06/28/22	Kara B. Hendricks	Work with C. Ney on maintenance of task chart status of existing projects.	0.20
06/28/22	Kara B. Hendricks	Prepare detailed task list an circulate for review and comment.	0.80
06/29/22	Cynthia L. Ney	Editing of task list; communications with K.Hendricks regarding projects.	0.40

Total Hours: 57.20

Invoice No.: 1000035547
 Matter No.: 209375.010100

Page 17

TIMEKEEPER SUMMARY FOR TASK CODE GW004.

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Kara B. Hendricks	16.60	565.00	9,379.00
Jason Hicks	2.10	425.00	892.50
Kyle Ewing	1.90	400.00	760.00
Christian Spaulding	8.40	375.00	3,150.00
Cynthia L. Ney	28.20	295.00	8,319.00
Total:	57.20		\$ 22,500.50

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Discounted Rate</u>	<u>Discounted Amount</u>
Kara B. Hendricks	52.60	480.25	7,972.23
Jason Hicks	27.40	361.75	758.64
Kyle Ewing	29.80	340.00	646.00
Christian Spaulding	32.30	318.75	2,677.51
Cynthia L. Ney	37.30	250.75	7,071.21
Discounted Total:	179.40		\$ 19,125.59

Invoice No.: 1000035547
Matter No.: 209375.010100

Page 18

TASK ACTIVITY GRAND TOTAL SUMMARY

<u>Task Code</u>	<u>Task Description</u>	<u>Hours</u>	<u>Standard Amount</u>
GW001	Asset Analysis and Recovery	179.40	76,400.00
GW004	Case Administration	57.20	22,500.50
	Total:	236.60	\$ 98,900.50
	Less Courtesy		\$ (14,835.07)
	Discount:		
	Total:		\$ 84,065.43

Invoice No.: 1000035547
Matter No.: 209375.010100

Page 19

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Standard Rate</u>	<u>Standard Amount</u>
Kara B. Hendricks	69.20	565.00	39,098.00
Jason Hicks	29.50	425.00	12,537.50
Kyle Ewing	31.70	400.00	12,680.00
Christian Spaulding	40.70	375.00	15,262.50
Cynthia L. Ney	65.50	295.00	19,322.50
Total:	236.60		\$ 98,900.50
Less Courtesy Discount:			\$ (14,835.07)
Total:			\$ 84,065.43

Invoice No.: 1000035547
 Re: SEC v. Beasley (Geoff Winkler, Receiver)
 Matter No.: 209375.010100

Page 20

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
06/06/22	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000044290 DATE: 6/15/2022 STANDARD RESEARCH (48 HRS) - UNITED STATES DISTRICT COURT DISTRICT OF NEVADA, 333 LAS VEGAS BLVD., SOUTH, LAS VEGAS NV on 6/6/22 Req'd by/for Escobar-Gaddi, Evelyn	\$	229.00
06/24/22	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00070222393 DATE: 7/2/2022 Trk'ing No. 1ZE0W1330192617858 / Next Day Air Commercial from Greenberg Traurig - Las Vegas Fred Cox to The Law Offices Of Garrett T. Ogata Garrett T. Ogata, Es on 6/24/2022 - 209375.010100	\$	14.69
Total Expenses:		\$	243.69

EXHIBIT “3”

**DECLARATION OF JOSHUA A. DEL CASTILLO IN
SUPPORT OF AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S PROFESSIONALS FOR
ALLOWANCE AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3, 2022
THROUGH JUNE 30, 2022
Pages 1-51**

UNITED STATES DISTRICT COURT

Case No. 2:22-cv-00612-CDS-EJY

EXHIBIT “3”

**DECLARATION OF JOSHUA A. DEL CASTILLO IN
SUPPORT OF AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S PROFESSIONALS FOR
ALLOWANCE AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3, 2022 THROUGH
JUNE 30, 2022**

Pages 1-51

1 Jarrod L. Rickard, Bar No. 10203
jlr@skrlawyers.com
2 Katie L. Cannata, Bar No. 14848
klc@skrlawyers.com
3 SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
4 Las Vegas, Nevada 89145
Telephone: (702) 835-6803
5 Facsimile: (702) 920-8669

6 David R. Zaro (admitted *pro hac vice*)
dzaro@allenmatkins.com
7 Joshua A. del Castillo (admitted *pro hac vice*)
jdelcastillo@allenmatkins.com
8 Matthew D. Pham (admitted *pro hac vice*)
mpham@allenmatkins.com
9 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
10 865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
11 Telephone: (213) 622-5555
Facsimile: (213) 620-8816

12 *Attorneys for Receiver Geoff Winkler*

Kara B. Hendricks, Bar No. 07743
hendricksk@gtlaw.com
Jason K. Hicks, Bar No. 13149
hicksja@gtlaw.com
Kyle A. Ewing, Bar No. 014051
ewingk@gtlaw.com
GREENBERG TRAUERIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

17 SECURITIES AND EXCHANGE
18 COMMISSION,

19 Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY, *et al.*,

22 Defendants,

23 THE JUDD IRREVOCABLE TRUST, *et al.*,

24 Relief Defendants.

Case No. 2:22-cv-00612-CDS-EJY

DECLARATION OF JOSHUA A. DEL
CASTILLO IN SUPPORT OF AMENDED
APPLICATION OF RECEIVER AND
RECEIVER'S PROFESSIONALS FOR
ALLOWANCE AND PAYMENT OF FEES
AND COSTS FOR THE PERIOD FROM JUNE
3, 2022 THROUGH JUNE 30, 2022

[Notice of Application; Application;
Memorandum of Points and Authorities; and
[Proposed] Order submitted concurrently
herewith]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- b. To the best of my knowledge, information and belief formed after reasonable inquiry, the 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 plaintiff Securities and Exchange Commission;
- c. Allen Matkins' fees reflected in the Application are based on the rates listed in Allen Matkins' fee schedule for this matter, subject to increases disclosed to the Securities and Exchange Commission, and approved by the Court prior to any such increase. All fees contained in the Application are reasonable, necessary and commensurate with the skill and experience required for the activity performed and are subject to Court approval. Indeed, as reflected in the Application, Allen Matkins has substantially discounted its hourly rates for all timekeepers staffed on this matter, again, in amounts exceeding 40% in some instances. In addition, and in order to maximize the value of its services to the receivership estate, Allen Matkins has endeavored to avoid duplication of effort with the Receiver and co-counsel, and consistently strives to staff all matters in as efficient a manner as possible, utilizing personnel best suited to each task, consistent with the complexity and demands of the task;
- d. Allen Matkins has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission);
- e. In seeking reimbursement for a service which Allen Matkins 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), Allen Matkins requests reimbursement only for the

1 amount billed to Allen Matkins by the third-party vendor and paid by Allen
2 Matkins to such vendor. If such services are performed by the Allen
3 Matkins or its retained personnel, the Allen Matkins or its retained
4 personnel, as appropriate, will certify that it is not making a profit on such
5 reimbursable service.

6 5. As reflected in the Application, Allen Matkins is sensitive to the comments
7 received from the Commission concurrently with the Receiver's filing of the original version of
8 the Application. Likewise, Allen Matkins is sensitive to, and intends to satisfy to the best of its
9 ability, this Court's directives in connection with applications for fees and reimbursement of
10 expenses. To that end, and in addition to the substantial discounts Allen Matkins is applying to all
11 timekeepers in this matter, Allen Matkins is implementing additional procedures to further
12 improve and maximize the clarity of its billing entries.

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

14 Executed on September 14, 2022, at Los Angeles, California.

15
16 

17 _____
18 Joshua A. del Castillo
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

07/11/22 10:06:40 PROFORMA STATEMENT FOR MATTER 392775.00001 (WINKLER, GEOFF | Receiver for J&J Consul) (General & Administrative)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua
 Date of Last Billing:
 Proforma Number: 1169825
 Client/Matter Joint Group # 392775.1

Matter #: 392775.00001

Client Name: WINKLER, GEOFF | Receiver for J&J Consul
 Matter Name: General & Administrative
 Client Matter Number:

Disbursements for Matter 392775.00001 (General & Administrative)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
06/15/22	2769596	BW – Duplication - Black & White Copies	277.00	52.63				

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
		0.00		\$0.00
	Subtotal Fees			\$0.00
	Discount			0.00
	Total Fees			0.00
	Total Disbursements			52.63

Attorney Billing Instructions

() BILL ALL
 () BILL FEES ONLY
 () BILL COST ONLY

() Hold
 () Write Off
 () Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

Fiscal YTD Calendar YTD LTD

07/11/22 10:06:40 PROFORMA STATEMENT FOR MATTER 392775.00001 (WINKLER, GEOFF | Receiver for J&J Consul) (General & Administrative)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,157.86	0.00	1,157.86	52.63	0.00	52.63	52.63	0.00	52.63
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	52.63	0.00	52.63						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J
 Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00002

Client Name: WINKLER, GEOFF | Receiver for J&J Consul

Date of Last Billing:

Matter Name: General Receivership

Proforma Number: 1169825

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/03/22	8856897	Review Complaint, Motion to Appoint Receiver, Opposition to same, and Order Appointing Receiver (2.0); teleconferences with Receiver and D. Zaro regarding same (0.5).	Del Castillo, Joshua	2.50	1,362.50	1,362.50	WO	HD	TR	_____
06/03/22	8882615	Review and analyze order appointing receiver (0.5); Review and analyze SEC complaint, motion for TRO/preliminary injunction, motion for appointment of receiver, other relevant filings from SEC action (1.6)	Pham, Matt D.	2.10	934.50	2,297.00	WO	HD	TR	_____
06/05/22	8856901	Review and respond to correspondence from Receiver regarding case administration and related matters (0.6); review and respond to correspondence from counsel for interested parties (0.3); review pleadings in connection with forthcoming teleconferences (0.9); prepare for and attend teleconference with Receiver and local counsel (1.0); review and attend to anticipated motion to engage counsel (0.6).	Del Castillo, Joshua	3.40	1,853.00	4,150.00	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/05/22	8882617	Participate in virtual conference with Geoff Winkler and counsel regarding background (0.7); Confer with Josh del Castillo regarding immediate tasks to be performed (0.2)	Pham, Matt D.	0.90	400.50	4,550.50	WO	HD	TR	_____
06/06/22	8856903	Review documents and prepare for and attend teleconferences regarding case and estate administration issues; emails regarding same (3.5); teleconferences with counsel for debtors and Mr. Judd (1.0).	Del Castillo, Joshua	4.50	2,452.50	7,003.00	WO	HD	TR	_____
06/06/22	8882624	Confer with Josh del Castillo regarding updates and outstanding tasks (0.3); Virtually attend meeting with Geoff Winkler and legal team regarding update and outstanding tasks (0.7)	Pham, Matt D.	1.00	445.00	7,448.00	WO	HD	TR	_____
06/07/22	8856928	Prepare for and teleconferences and videoconferences with Receiver, counsel, and co-counsel regarding case and estate administration matters (2.5); review and respond to correspondence regarding pending and related bankruptcy proceedings and teleconference with M. Pham regarding same (0.6).	Del Castillo, Joshua	3.10	1,689.50	9,137.50	WO	HD	TR	_____
06/07/22	8882650	Confer with Josh del Castillo regarding update on outstanding tasks (0.2); Virtually attend meeting with Geoff Winkler and legal team regarding updates (0.6)	Pham, Matt D.	0.80	356.00	9,493.50	WO	HD	TR	_____
06/08/22	8856934	Teleconference with Receiver an prepare draft NDA in connection with anticipated storage facility agreement and transmit to	Del Castillo, Joshua	2.50	1,362.50	10,856.00	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Receiver (0.5); review dockets and emails regarding case administration issues (0.5); review and attention to pro hac vice admission matters (0.5); prepare for and attend video conference with Receiver and local counsel and follow-up emails regarding same (1.0).								
06/08/22	8862439	Attend meeting with Receiver team and counsel to address document recovery, stay of state and federal cases, the investor communications, coordination.	Zaro, David	0.70	381.50	11,237.50	WO	HD	TR	_____
06/08/22	8882676	Virtually attend meeting with Geoff Winkler and legal team regarding updates on outstanding tasks	Pham, Matt D.	0.90	400.50	11,638.00	WO	HD	TR	_____
06/09/22	8857547	Emails and teleconferences with counsel regarding case administration matters (0.4); prepare for and teleconference with Receiver and co-counsel (0.6).	Del Castillo, Joshua	1.00	545.00	12,183.00	WO	HD	TR	_____
06/09/22	8882706	Virtually attend meeting with Geoff Winkler and legal team regarding latest updates and outstanding tasks	Pham, Matt D.	0.50	222.50	12,405.50	WO	HD	TR	_____
06/10/22	8863792	Several calls/email with Receiver, counsel, and Receiver team meeting to address the next steps, taxes, accounting and bankruptcy, follow-up.	Zaro, David	0.60	327.00	12,732.50	WO	HD	TR	_____
06/10/22	8882754	Virtually attend meeting with Geoff Winkler and legal team regarding updates on outstanding tasks	Pham, Matt D.	0.60	267.00	12,999.50	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/13/22	8860606	Teleconference with D. Zaro regarding case administration issues (0.3); prepare for and attend call with Receiver's office and co-counsel (0.5); attention to various case administration issues (0.3).	Del Castillo, Joshua	1.10	599.50	13,599.00	WO	HD	TR	_____
06/13/22	8882783	Virtually attend meeting with Geoff Winkler and legal team regarding latest updates	Pham, Matt D.	0.50	222.50	13,821.50	WO	HD	TR	_____
06/14/22	8862667	Prepare for and teleconference with Receiver and co-counsel regarding pending and critical case administration matters (0.7).	Del Castillo, Joshua	0.70	381.50	14,203.00	WO	HD	TR	_____
06/14/22	8882794	Draft email to Amanda Deering regarding emails and phone calls from investors (0.2); Virtually attend meeting with Geoff Winkler and legal team regarding updates and tasks (0.6)	Pham, Matt D.	0.80	356.00	14,559.00	WO	HD	TR	_____
06/15/22	8863969	Prepare for and attend teleconference with Receiver and co-counsel regarding case administration matters (0.4); attention to critical outstanding case administration issues and review documents in connection with same (0.4).	Del Castillo, Joshua	0.80	436.00	14,995.00	WO	HD	TR	_____
06/15/22	8882834	Virtually attend meeting with Geoff Winkler and legal team regarding latest updates	Pham, Matt D.	0.20	89.00	15,084.00	WO	HD	TR	_____
06/16/22	8864401	Confer with D. Zaro and local counsel and attention to case administration matters (0.9).	Del Castillo, Joshua	0.90	490.50	15,574.50	WO	HD	TR	_____
06/16/22	8882844	Phone call with Simona Peng regarding central database for third parties' document	Pham, Matt D.	0.30	133.50	15,708.00	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		productions (0.1); Virtually attend meeting with Geoff Winkler and legal team regarding updates (0.2)								
06/17/22	8866058	Emails and teleconferences and review documents in connection with pending case administration matters (0.9); prepare for and attend call with Receiver and co-counsel (0.5).	Del Castillo, Joshua	1.40	763.00	16,471.00	WO	HD	TR	_____
06/17/22	8867046	Review and respond to emails and initial review of district courts for 28 USC 754 filings.	Kaup, John	0.30	105.00	16,576.00	WO	HD	TR	_____
06/17/22	8882878	Correspondence with client regarding documents, investor emails (0.3); Virtually attend meeting with client and legal team regarding latest updates (0.2)	Pham, Matt D.	0.50	222.50	16,798.50	WO	HD	TR	_____
06/20/22	8867339	Attention to case administration matters and confer with counsel regarding same (1.1); review proposed notice and status report for associated bankruptcy cases and provide comments to same (0.3).	Del Castillo, Joshua	1.40	763.00	17,561.50	WO	HD	TR	_____
06/20/22	8868443	Review and respond to emails and telephone call with Attorney Del Castillo regarding 28 USC section 754 filings and recording of receiver's order; prepare notices of receivership.	Kaup, John	1.80	630.00	18,191.50	WO	HD	TR	_____
06/21/22	8869314	Confer with D. Zaro and M. Pham regarding estate and case administration matters; emails regarding same (0.6); review 754 filings (0.2).	Del Castillo, Joshua	0.80	436.00	18,627.50	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/21/22	8869836	Assist with filings of notices of appointment of receiver and review and respond to related emails.	Kaup, John	0.50	175.00	18,802.50	WO	HD	TR	_____
06/22/22	8870081	Legal analysis of prospective elisor or similar equitable appointment to restore legal title to personal property assets (1.2); email to local counsel regarding same (0.1); review and respond to correspondence from proposed local counsel (0.2); inventory of outstanding case administration matters and prepare inquiry to GT regarding same (0.5); emails regarding 754 filings and review materials in connection with same (0.4).	Del Castillo, Joshua	2.40	1,308.00	20,110.50	WO	HD	TR	_____
06/22/22	8871413	Review and respond to emails and follow up on 28 USC section 754 filings.	Kaup, John	0.40	140.00	20,250.50	WO	HD	TR	_____
06/22/22	8879307	Review receiver order regarding deadlines for receiver's deliverables.	Akopchikyan, Karine	0.50	222.50	20,473.00	WO	HD	TR	_____
06/23/22	8871153	Emails and teleconferences with counsel, co-counsel, and Receiver's office regarding case administration matters (0.9).	Del Castillo, Joshua	0.90	490.50	20,963.50	WO	HD	TR	_____
06/23/22	8872413	Follow up on 28 USC section 754 filings.	Kaup, John	0.40	140.00	21,103.50	WO	HD	TR	_____
06/23/22	8879314	Prepare chart summarizing receiver deliverables and respective deadlines.	Akopchikyan, Karine	1.00	445.00	21,548.50	WO	HD	TR	_____
06/24/22	8872995	Initial review of draft bankruptcy report and discussion with counsel regarding same (0.5).	Del Castillo, Joshua	0.50	272.50	21,821.00	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/24/22	8874333	Follow up on 28 USC section 754 filings.	Kaup, John	0.40	140.00	21,961.00	WO	HD	TR	_____
06/24/22	8879317	Attention to emails regarding receiver deadline chart; and revise chart.	Akopchikyan, Karine	0.50	222.50	22,183.50	WO	HD	TR	_____
06/25/22	8873709	Review and respond to case administration inquiries from Receiver and co-counsel; review documents in connection with same (0.6).	Del Castillo, Joshua	0.60	327.00	22,510.50	WO	HD	TR	_____
06/26/22	8873902	Review and revise draft bankruptcy report and confer with counsel regarding same (2.1); emails regarding other pending case administration issues (0.4).	Del Castillo, Joshua	2.50	1,362.50	23,873.00	WO	HD	TR	_____
06/27/22	8875146	Review and prepare final revisions to draft bankruptcy report and confer with counsel regarding same (0.6); review recent pleadings filed in receivership action (0.9); confer with counsel and co-counsel regarding case administration matters (0.5).	Del Castillo, Joshua	2.00	1,090.00	24,963.00	WO	HD	TR	_____
06/27/22	8875801	Review subscription agreements for convertible debentures to determine: (1) whether secured or unsecured, (2) subordinated or impaired, and (3) monetization options; draft summary of agreements, exhibits, and key sections.	Ellis, Bryce	1.90	845.50	25,808.50	WO	HD	TR	_____
06/27/22	8876720	Review of 28 USC section 754 filings.	Kaup, John	0.20	70.00	25,878.50	WO	HD	TR	_____
06/27/22	8883013	Review district court's local rules regarding receivership procedures (0.4); Begin drafting motion in aid of receivership,	Pham, Matt D.	1.10	489.50	26,368.00	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		proposed order thereon (0.7)								
06/28/22	8877053	Prepare for and attend call with Receiver and co-counsel regarding pending case administration issues (0.5).	Del Castillo, Joshua	0.50	272.50	26,640.50	WO	HD	TR	_____
06/28/22	8877492	Follow up on status of 28 USC section 754 filings.	Kaup, John	0.20	70.00	26,710.50	WO	HD	TR	_____
06/29/22	8877941	Emails and teleconference regarding bankruptcy report and contemplated revisions to and filing for same (0.7).	Del Castillo, Joshua	0.70	381.50	27,092.00	WO	HD	TR	_____
06/29/22	8879166	Review and respond to emails and forward information regarding 28 USC section 754 filing in Montana.	Kaup, John	0.30	105.00	27,197.00	WO	HD	TR	_____
06/29/22	8883078	Draft email to local counsel regarding bankruptcy report and other case administration matters (0.2); Review and analyze SEC's amended complaint, motion to amend preliminary injunction order, and motion to amend appointment order (0.7)	Pham, Matt D.	0.90	400.50	27,597.50	WO	HD	TR	_____
06/30/22	8879374	Review and respond to emails and inquiries the bankruptcy report and recommendation, confer with counsel and local counsel regarding revisions to and filing of same, and prepare edits to document (0.9); review notes and emails with local counsel's office regarding pending case administration issues (0.5).	Del Castillo, Joshua	1.40	763.00	28,360.50	WO	HD	TR	_____
06/30/22	8883129	Draft email to local counsel regarding approach to contacting chambers for scheduling required hearings (0.3); Phone	Pham, Matt D.	0.40	178.00	28,538.50	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Fees for Matter 392775.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		call with Judge Silva's chambers regarding scheduling hearings (0.1)					

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	_____
06/09/22	2769201	BW – Duplication - Black & White Copies	69.00	13.11	WO	HD	TR	_____
06/09/22	2770480	MSNGR – Federal Express - Ship To: Laura Mogensen, Global Gen C - Bank of America	0.00	28.04	WO	HD	TR	_____
06/09/22	2770481	MSNGR – Federal Express - Ship To: Ellen Patterson Sr VP, GC - Wells Fargo & Company	0.00	28.04	WO	HD	TR	_____
06/09/22	2770850	MSNGR – Nationwide Legal, LLC - NATIONWIDE LEGAL, Notarize Documents	0.00	435.00	WO	HD	TR	_____
06/14/22	2772186	RSRCH – WestLaw	0.00	57.00	WO	HD	TR	_____
06/21/22	2770298	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver	0.00	49.00	WO	HD	TR	_____
06/21/22	2770302	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver	0.00	49.00	WO	HD	TR	_____
06/21/22	2770303	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver	0.00	49.00	WO	HD	TR	_____
06/21/22	2770304	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver	0.00	49.00	WO	HD	TR	_____
06/21/22	2771242	MSNGR – Federal Express - Ship To: District of Alaska - U S District Court Clerk of	0.00	65.59	WO	HD	TR	_____
06/21/22	2771250	MSNGR – Federal Express - Ship To: District of Montana - U S District Court Clerk of	0.00	43.92	WO	HD	TR	_____
06/21/22	2771252	MSNGR – Federal Express - Ship To: Eastern District of Washingto - US District Court Clerk of t	0.00	47.09	WO	HD	TR	_____
06/21/22	2771258	MSNGR – Federal Express - Ship To: DISTRICT OF UTAH - U S DISTRICT COURT CLERK OF	0.00	45.91	WO	HD	TR	_____

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

Disbursements for Matter 392775.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
06/22/22	2770361	FILING – Clerk of the Court - Miscellaneous Court Filing Fee for Notice of Appointment of Receiver	0.00	49.00	WO	HD	TR	_____
06/22/22	2772606	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	38.99	WO	HD	TR	_____
06/23/22	2772608	MSNGR – Federal Express - Ship To: Western District of Washington - U S District Court Clerk of	0.00	47.50	WO	HD	TR	_____
06/23/22	2772609	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	37.97	WO	HD	TR	_____
06/23/22	2772610	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	30.04	WO	HD	TR	_____
06/24/22	2772612	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	42.91	WO	HD	TR	_____
06/27/22	2772614	MSNGR – Federal Express - Ship To: John Kaup - Allen Matkins	0.00	38.99	WO	HD	TR	_____
06/28/22	2771451	BW – Duplication - Black & White Copies	330.00	62.70	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.30	545.00	708.50
000820	Kaup, John	4.50	350.00	1,575.00
001842	Del Castillo, Joshua	35.60	545.00	19,402.00
002510	Pham, Matt D.	11.50	445.00	5,117.50
002566	Akopchikyan, Karine	2.00	445.00	890.00
002569	Ellis, Bryce	1.90	445.00	845.50
		<u>56.80</u>		<u>\$28,538.50</u>
Subtotal Fees				\$28,538.50
Discount				0.00
Total Fees				28,538.50
Total Disbursements				1,307.80

Attorney Billing Instructions

- () BILL ALL
- () BILL FEES ONLY
- () Hold
- () Write Off

07/11/22 10:06:41 PROFORMA STATEMENT FOR MATTER 392775.00002 (WINKLER, GEOFF | Receiver for J&J Consul) (General Receivership)

() BILL COST ONLY

() Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	32,171.30	30,863.50	1,307.80	32,171.30	30,863.50	1,307.80
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	32,171.30	30,863.50	1,307.80						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00003

Client Name: WINKLER, GEOFF | Receiver for J&J Consul

Date of Last Billing:

Matter Name: Asset Recovery & Management

Proforma Number: 1169825

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/03/22	8856898	Prepare draft turnover demand letter for Receiver and transmit to Receiver for use in connection with pending asset recovery efforts (0.5).	Del Castillo, Joshua	0.50	272.50	272.50	WO	HD	TR	_____
06/06/22	8856905	Emails regarding turnover issues (0.6); prepare template demand letters (0.3); analysis for anticipated OSC regarding contempt in connection with turnover and prepare draft regarding same (1.9).	Del Castillo, Joshua	2.80	1,526.00	1,798.50	WO	HD	TR	_____
06/06/22	8882630	Review and analyze draft letter to Anderson firm re turnover	Pham, Matt D.	0.10	44.50	1,843.00	WO	HD	TR	_____
06/07/22	8856932	Review documents and prepare form turnover letter to banks regarding receivership accounts (1.0); emails and teleconference with counsel regarding same (0.3).	Del Castillo, Joshua	1.30	708.50	2,551.50	WO	HD	TR	_____
06/07/22	8859037	Analysis of asset lists and meeting with Receiver to advise as to legal issues -- turnover (.9). Attend meeting with Receiver/local counsel and Paula Beasley	Zaro, David	3.10	1,689.50	4,241.00	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		regarding turnover (.5). Prepare for/evaluate Bank turnover issues (.7). Work with Receiver and counsel to address turnover of attorney accounts and assets, attend meeting with Receiver/counsel and legal advice as to strategy (.9).								
06/07/22	8866368	Review and respond to emails and telephone call with Mr. Pham; research and compile information regarding financial institutions for delivery of notice of receivership.	Kaup, John	2.50	875.00	5,116.00	WO	HD	TR	_____
06/07/22	8882651	Review and analyze list of real properties and other documents to confirm title in such properties	Pham, Matt D.	1.20	534.00	5,650.00	WO	HD	TR	_____
06/08/22	8856937	Emails and teleconferences with Receiver and local counsel regarding pending asset recovery and turnover matters (1.1); prepare correspondence to defendants' counsel regarding appointment of Receiver and request for turnover of client trust account funds and emails and teleconferences regarding same (1.9).	Del Castillo, Joshua	3.00	1,635.00	7,285.00	WO	HD	TR	_____
06/08/22	8862424	Several emails/calls with Receiver and counsel to discuss recovery issues (.6). Analysis of turnover orders and address vehicle and real property issues/demand letters (.8). Calls/advice to the Receiver as to recoveries/strategy (.4).	Zaro, David	1.80	981.00	8,266.00	WO	HD	TR	_____
06/08/22	8882671	Revise and update letters requesting account turnovers to banks (0.2); Prepare schedules listing bank accounts; continue	Pham, Matt D.	1.20	534.00	8,800.00	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		drafting and revising letters requesting account turnovers to banks (1.0)								
06/09/22	8857545	Review draft OSC papers and review and revise declaration for same (0.6); emails with counsel regarding same (0.2); emails with Receiver regarding pending turnover requests (0.2); emails with SEC and counsel, and voicemails and emails to banks regarding turnover requests; confer with counsel regarding same (0.8); review and respond to correspondence from defendant representatives regarding turnover of funds and confer with Receiver and counsel regarding same (1.6).	Del Castillo, Joshua	3.40	1,853.00	10,653.00	WO	HD	TR	_____
06/09/22	8863742	Several emails related to the bank accounts and turnover demands (.5). Several emails/call with Receiver related to the Tanner turnover of assets and related issues (.8).	Zaro, David	1.30	708.50	11,361.50	WO	HD	TR	_____
06/10/22	8858905	Emails and teleconferences with co-counsel, K. Anderson, K. Dean, and N. Oberheimer regarding third party turnover requests, and anticipated motions in connection with same (2.7); teleconference and emails with attorney J. Issacson regarding attorney M. Peters turn over of client trust account funds and emails with Receiver and counsel regarding same (0.5); prepare revisions to declaration in connection with motion to compel turnover or for OSC and correspondence regarding same (0.3); teleconference and emails with counsel for US Bank regarding turnover	Del Castillo, Joshua	4.10	2,234.50	13,596.00	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/10/22	8863776	request (0.6). Respond to email inquiry of Receiver/counsel and associated research/analysis of the court orders, the records, docket of pending actions (1.6). Attend meeting related to the recovery of account funds and several attorney accounts (.6). Several emails and communications with Receiver, HOA-MOA counsel to work to recover Henderson property (.7).	Zaro, David	2.90	1,580.50	15,176.50	WO	HD	TR	_____
06/10/22	8882744	Draft email to Geoff Winkler regarding various Judd trusts, review and analyze documents relating to frozen accounts and real properties	Pham, Matt D.	0.40	178.00	15,354.50	WO	HD	TR	_____
06/13/22	8860442	Review and respond to correspondence and voicemails and teleconference regarding pending asset turnover requests and confer with counsel regarding same (2.2).	Del Castillo, Joshua	2.20	1,199.00	16,553.50	WO	HD	TR	_____
06/13/22	8863803	Analysis of claims to assets/share or interests in Flavocure, follow-up (.6). Follow-up on the turnover demands to banks per order, including evaluation of counsel's responses/defenses and advice as to turnovers/email (.8).	Zaro, David	1.40	763.00	17,316.50	WO	HD	TR	_____
06/13/22	8876275	Analyze Mr. Oberheiden's letter and research legal authority cited in same; analyze pleadings and legal authority therein for the American Pension Services matter; confer with Mr. del Castillo	Akopchikyan, Karine	2.30	1,023.50	18,340.00	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		regarding same; and draft response to Oberheiden's letter.								
06/14/22	8862016	Review and respond to correspondence regarding turnover of funds from attorney Peters (0.3); prepare and transmit requested formal turnover instruction (0.3); prepare additional follow-ups to counsel regarding turnover demands and teleconferences regarding same (1.5).	Del Castillo, Joshua	2.10	1,144.50	19,484.50	WO	HD	TR	_____
06/14/22	8876281	Research and analyze Sixth Amendment right to counsel and payment of related fees from frozen assets, defendant's burden of proof in a civil matter to release assets for attorneys' fees, defendant's burden of proof in a criminal matter to release assets for attorneys' fees, and apportionment of civil and criminal fees.	Akopchikyan, Karine	1.00	445.00	19,929.50	WO	HD	TR	_____
06/14/22	8882797	Review and analyze draft of letter/memo regarding defendants' retention of funds for attorneys fees, along with relevant case law (0.5); Confer with Karine Akopchikyan regarding legal research on defendants' retention of funds (0.3)	Pham, Matt D.	0.80	356.00	20,285.50	WO	HD	TR	_____
06/15/22	8863373	Emails and teleconferences regarding pending turnover demands with J. Sellers, K. Dean, counsel and co-counsel, counsel for U.S. Bank, Oberheiden P.C., and Receiver's office (2.9).	Del Castillo, Joshua	2.90	1,580.50	21,866.00	WO	HD	TR	_____
06/15/22	8866147	Evaluate the debentures investment documents and analysis of Receiver interests/turnover (.5). Calls with counsel	Zaro, David	1.30	708.50	22,574.50	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		and Receiver related to the debenture issues and recovery (.4). Follow-up emails and calls/advice as to recovery of funds from counsel and third parties (.4).								
06/16/22	8864810	Review and respond to inquiries and correspondence regarding pending asset recovery efforts (0.9).	Del Castillo, Joshua	0.90	490.50	23,065.00	WO	HD	TR	_____
06/16/22	8867719	Work on and provide legal advice to Receiver and counsel regarding enforcement of appointment order, follow-up (.7). Analysis of issues re: bank turnover/meeting with Receiver and counsel regarding lender turnover (.7). Several emails to follow-up on the attorney turnover demands and follow-up advice to counsel (.6).	Zaro, David	2.00	1,090.00	24,155.00	WO	HD	TR	_____
06/16/22	8882849	Review and analyze document production from Judd (produced to Debtors/CRO)	Pham, Matt D.	0.40	178.00	24,333.00	WO	HD	TR	_____
06/17/22	8865767	Follow-up via email and voicemail regarding outstanding turnover demands (1.3); emails with Receiver's office regarding same (0.4).	Del Castillo, Joshua	1.70	926.50	25,259.50	WO	HD	TR	_____
06/17/22	8867734	Analysis of order and counsel response to turnover demands (.4). Emails from Receiver and counsel to address recovery of assets and advice related to the motion for turnover and/or OSC (.3).	Zaro, David	0.70	381.50	25,641.00	WO	HD	TR	_____
06/19/22	8866748	Review Judd filing regarding asset listing and emails with Receiver and counsel regarding same (0.4); legal analysis in connection with contemplated template	Del Castillo, Joshua	3.50	1,907.50	27,548.50	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		motion to sell real property and commence draft of same (3.1).								
06/20/22	8867340	Confer with D. Zaro, T. Fates, and Receiver's office regarding pending motions to approve sales procedures for personal and real property and attention to issues regarding same (1.3); review and revise motion to sell personal property assets (0.9).	Del Castillo, Joshua	2.20	1,199.00	28,747.50	WO	HD	TR	_____
06/20/22	8871536	Follow-up on the turnover demands, letters to defendants counsel, advice related to title transfers.	Zaro, David	0.40	218.00	28,965.50	WO	HD	TR	_____
06/20/22	8882920	Review and analyze documents produced by U.S. Bank	Pham, Matt D.	0.20	89.00	29,054.50	WO	HD	TR	_____
06/21/22	8868692	Review correspondence with non-cooperating attorneys regarding turnover and confer with local counsel regarding application for OSC regarding contempt/turnover (0.5); legal analysis, review documents, and prepare revised motion for turnover template (2.8).	Del Castillo, Joshua	3.30	1,798.50	30,853.00	WO	HD	TR	_____
06/22/22	8870401	Emails with attorney K. Dean regarding Receiver's turnover request and confer with counsel regarding same (0.7); review accounting from Oberheiden PC (0.1); review correspondence from counsel for US Bank regarding turnover of accounts (0.1).	Del Castillo, Joshua	0.90	490.50	31,343.50	WO	HD	TR	_____
06/23/22	8871715	Confer with D. Zaro, Receiver's office, and co-counsel regarding pending asset recovery efforts and review materials in	Del Castillo, Joshua	1.10	599.50	31,943.00	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		connection with same (1.1).								
06/23/22	8873247	Several emails and advice to counsel as to the attorney account turnovers and Judd counsel's response (.5). Call with counsel for Judd related to fees/turnover and disputed issues, follow-up email to Receiver/counsel as to the next steps (.8).	Zaro, David	1.30	708.50	32,651.50	WO	HD	TR	_____
06/24/22	8873002	Review detailed correspondence and materials from attorney K. Dean and confer with D. Zaro regarding same (0.6).	Del Castillo, Joshua	0.60	327.00	32,978.50	WO	HD	TR	_____
06/24/22	8874907	Several emails/evaluate counsel letter attachments as to trust account funds and Judd transfers, follow-up response.	Zaro, David	0.80	436.00	33,414.50	WO	HD	TR	_____
06/27/22	8875247	Review and respond to correspondence regarding outstanding asset recovery efforts (0.3); review Judd motion regarding retention of client trust account funds and emails with Receiver and co-counsel regarding same (0.5).	Del Castillo, Joshua	0.80	436.00	33,850.50	WO	HD	TR	_____
06/28/22	8883042	Review and analyze Bryce Ellis's write-up regarding convertible debentures	Pham, Matt D.	0.20	89.00	33,939.50	WO	HD	TR	_____
06/29/22	8883077	Review and analyze convertible debenture documents (0.6); Draft emails to Sam Schwartz regarding real property sales (0.3)	Pham, Matt D.	0.90	400.50	34,340.00	WO	HD	TR	_____
06/30/22	8879880	Review Court order regarding initial turnover motion (0.1); review and respond to correspondence from U.S. Bank counsel regarding turnover request and certified statement regarding accounts (0.1); review	Del Castillo, Joshua	0.50	272.50	34,612.50	WO	HD	TR	_____

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		documents (0.3).						
06/30/22	8882567	Review 28 USC section 754 filings.	Kaup, John	0.10	35.00	34,647.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	17.00	545.00	9,265.00
000820	Kaup, John	2.60	350.00	910.00
001842	Del Castillo, Joshua	37.80	545.00	20,601.00
002510	Pham, Matt D.	5.40	445.00	2,403.00
002566	Akopchikyan, Karine	3.30	445.00	1,468.50
		66.10		\$34,647.50
Subtotal Fees				\$34,647.50
Discount				0.00
Total Fees				34,647.50
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD		Calendar YTD			LTD			
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,651.50	3,651.50	0.00	40,980.00	40,980.00	0.00	40,980.00	40,980.00	0.00

07/11/22 10:06:42 PROFORMA STATEMENT FOR MATTER 392775.00003 (WINKLER, GEOFF | Receiver for J&J Consul) (Asset Recovery & Management)

Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	Fees	Costs
WIP	40,980.00	40,980.00	0.00
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J
 Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00004

Client Name: WINKLER, GEOFF | Receiver for J&J Consul

Date of Last Billing:

Matter Name: Investigation & Reporting

Proforma Number: 1169825

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/07/22	8859018	Work on issues concerning Receiver accounting, immediate discovery, issues and bankruptcy case (.8).	Zaro, David	0.80	436.00	436.00	WO	HD	TR	_____
06/07/22	8882656	Continue reviewing bankruptcy filings, draft outline regarding outstanding/pending bankruptcy matters and associated deadlines	Pham, Matt D.	1.70	756.50	1,192.50	WO	HD	TR	_____
06/08/22	8862421	Research/analysis of bankruptcy issues, the pending cases, adversary proceedings and documents (2.2). Meeting with counsel and follow-up with Receiver to address bankruptcy cases, viability of matters, next steps as to reporting (.9).	Zaro, David	3.10	1,689.50	2,882.00	WO	HD	TR	_____
06/08/22	8882673	Review and analyze filings from SEC action and bankruptcy cases; begin drafting Receiver's report regarding bankruptcy cases	Pham, Matt D.	1.60	712.00	3,594.00	WO	HD	TR	_____
06/09/22	8862618	Analysis of schedules filed by debtors and five pending adversary proceedings filed in the two bankruptcy cases to assess the	Zaro, David	2.20	1,199.00	4,793.00	WO	HD	TR	_____

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		viability and benefits versus the costs of the bankruptcy proceedings.								
06/09/22	8882704	Review and analyze bankruptcy filings to incorporate relevant information into bankruptcy report	Pham, Matt D.	1.20	534.00	5,327.00	WO	HD	TR	_____
06/10/22	8882747	Continue drafting report regarding recommendation on bankruptcy cases	Pham, Matt D.	1.50	667.50	5,994.50	WO	HD	TR	_____
06/13/22	8863807	Analysis of bankruptcy issues and status per the report from debtor, email/call with Receiver, counsel as to bankruptcy report, and evaluation, advice as to report (1.3). Work with Receiver counsel and advice related to Receiver accounting records (.4). Attend team meeting with Receiver team and advice to Receiver (.4).	Zaro, David	2.10	1,144.50	7,139.00	WO	HD	TR	_____
06/13/22	8882779	Confer with David Zaro regarding contents of bankruptcy report (0.4); Review and analyze bankruptcy filings for bankruptcy report; continue drafting bankruptcy report (0.8); Continue drafting bankruptcy report - discussion regarding procedural posture of bankruptcy cases (1.8)	Pham, Matt D.	3.00	1,335.00	8,474.00	WO	HD	TR	_____
06/14/22	8864879	Work on the bankruptcy case issues, including outstanding discovery, emails and calls to provide advice to Receiver/counsel (.9). Email related to investment in Flavocure, conference with Mr. Swanson related to convertible debentures and follow-up (.9).	Zaro, David	1.80	981.00	9,455.00	WO	HD	TR	_____

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/15/22	8882830	Continue drafting bankruptcy report - discussion of procedural posture of adversary proceedings	Pham, Matt D.	1.80	801.00	10,256.00	WO	HD	TR	_____
06/16/22	8882847	Continue drafting bankruptcy report - discussion regarding procedural posture of SEC Action (1.8); Continue drafting bankruptcy report - procedural background of SEC Action and J&J bankruptcy cases (0.8)	Pham, Matt D.	2.60	1,157.00	11,413.00	WO	HD	TR	_____
06/17/22	8867730	Analysis of bankruptcy schedule, spreadsheets and records turned over by counsel and advice to Receiver counsel as to bankruptcy report (.6). Several calls with counsel and work related to the bankruptcy report (.3).	Zaro, David	0.90	490.50	11,903.50	WO	HD	TR	_____
06/17/22	8882872	Continue drafting bankruptcy report - summary of SEC's complaint	Pham, Matt D.	0.80	356.00	12,259.50	WO	HD	TR	_____
06/20/22	8871547	Analysis of pending bankruptcy issues and work on response, agenda for bankruptcy hearing (.4). Emails/advice to counsel related to the bankruptcy case, status conference (.4).	Zaro, David	0.80	436.00	12,695.50	WO	HD	TR	_____
06/20/22	8882900	Continue drafting bankruptcy report - discussion regarding SEC Action, summary of SEC's complaint	Pham, Matt D.	0.60	267.00	12,962.50	WO	HD	TR	_____
06/21/22	8873197	Analysis of docket, agenda and emails as to bankruptcy status conference (.5). Advice to counsel as to the hearing/status conference related to the J&J bankruptcy matters/motions and follow-up (.6). Emails	Zaro, David	1.70	926.50	13,889.00	WO	HD	TR	_____

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered related to investor litigation and follow-up with Receiver (.6).	Timekeeper	Hours	Fees	Sum	Circle Action			
06/21/22	8882942	Continue drafting bankruptcy report - discussion regarding recommendation	Pham, Matt D.	0.80	356.00	14,245.00	WO	HD	TR	_____
06/22/22	8873214	Evaluate bankruptcy findings and several emails/calls related to the Receiver bankruptcy report.	Zaro, David	0.40	218.00	14,463.00	WO	HD	TR	_____
06/22/22	8882959	Continue drafting bankruptcy report - discussion regarding withdrawal of the reference (1.2); discussion regarding J&J Debtors' bankruptcy cases (1.7); summary of J&J Debtors' schedules, statements of financial affairs (1.9); discussion regarding post-receivership efforts in bankruptcy cases (1.8)	Pham, Matt D.	6.60	2,937.00	17,400.00	WO	HD	TR	_____
06/23/22	8882976	Discussion regarding district court's broad equitable authority (1.8); discussion regarding fraudulent transfers (0.5); analysis regarding no need for use of Bankruptcy Code provisions (0.6); analysis regarding preferences/preferential transfers (1.1);	Pham, Matt D.	4.00	1,780.00	19,180.00	WO	HD	TR	_____
06/23/22	8882984	Continue drafting bankruptcy report - analysis regarding expense, duplication of concurrent proceedings (0.8); analysis regarding issues arising from not all receivership entities being in bankruptcy (1.7); analysis regarding receivership flexibility (1.5).	Pham, Matt D.	4.00	1,780.00	20,960.00	WO	HD	TR	_____

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Fees for Matter 392775.00004.(Investigation & Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/24/22	8874910	Emails, analysis and revisions to draft receiver report concerning bankruptcy issues, follow-up.	Zaro, David	1.20	654.00	21,614.00	WO	HD	TR	_____
06/24/22	8882996	Continue drafting bankruptcy report - analysis regarding equivalent relief in receivership (1.5); analysis regarding benefit to investors (1.8); preliminary statement, recommendation, conclusion (1.9)	Pham, Matt D.	5.20	2,314.00	23,928.00	WO	HD	TR	_____
06/28/22	8883051	Phone call with the SEC regarding bankruptcy report (0.2); Make revisions to bankruptcy report following SEC call and comments made during such call (0.2)	Pham, Matt D.	0.40	178.00	24,106.00	WO	HD	TR	_____
06/29/22	8883084	Draft notice of hearing on bankruptcy report and notice of filing of bankruptcy report (0.4); Draft email to the SEC regarding Receiver's bankruptcy report (0.2)	Pham, Matt D.	0.60	267.00	24,373.00	WO	HD	TR	_____
06/30/22	8883132	Make additional revisions to bankruptcy report based on SEC's comments (0.7); Phone call with the SEC regarding revised bankruptcy report (0.1); Revise and finalize report and reporting regarding bankruptcy cases (0.5).	Pham, Matt D.	1.30	578.50	24,951.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	15.00	545.00	8,175.00
002510	Pham, Matt D.	37.70	445.00	16,776.50
		52.70		\$24,951.50
Subtotal Fees				\$24,951.50

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				24,951.50
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,526.00	1,526.00	0.00	29,370.00	29,370.00	0.00	29,370.00	29,370.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	29,370.00	29,370.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC

07/11/22 10:06:44 PROFORMA STATEMENT FOR MATTER 392775.00004 (WINKLER, GEOFF | Receiver for J&J Consul) (Investigation & Reporting)

Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

07/11/22 10:06:45 PROFORMA STATEMENT FOR MATTER 392775.00005 (WINKLER, GEOFF | Receiver for J&J Consul) (Investor Issues & Communications)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua Matter #: 392775.00005 Client Name: WINKLER, GEOFF | Receiver for J&J Consul
 Date of Last Billing: Matter Name: Investor Issues & Communications
 Proforma Number: 1169825
 Client/Matter Joint Group # 392775.1 Client Matter Number:

Fees for Matter 392775.00005.(Investor Issues & Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/09/22	8882702	Multiple phone calls with investors regarding receivership inquiries (0.6); Phone calls with investors regarding receivership inquiries (0.4); Draft emails responding to investors' inquiries (0.5); Phone calls with investors regarding receivership (0.3)	Pham, Matt D.	1.80	801.00	801.00	WO	HD	TR	_____
06/10/22	8882749	Phone call with investor regarding receivership inquiry	Pham, Matt D.	0.20	89.00	890.00	WO	HD	TR	_____
06/13/22	8882785	Draft emails in response to emails from investors regarding their receivership inquiries	Pham, Matt D.	1.00	445.00	1,335.00	WO	HD	TR	_____
06/14/22	8882789	Draft emails in response to investors' emails addressing their inquiries (0.7); Multiple phone calls with investors regarding receivership (0.4)	Pham, Matt D.	1.10	489.50	1,824.50	WO	HD	TR	_____
06/15/22	8882832	Phone call with investor regarding receivership	Pham, Matt D.	0.10	44.50	1,869.00	WO	HD	TR	_____

07/11/22 10:06:45 PROFORMA STATEMENT FOR MATTER 392775.00005 (WINKLER, GEOFF | Receiver for J&J Consul) (Investor Issues & Communications)

Fees for Matter 392775.00005.(Investor Issues & Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/16/22	8882842	Draft emails in response to investors' emails (0.4); Multiple phone calls with investors regarding receivership inquiries (0.2)	Pham, Matt D.	0.60	267.00	2,136.00	WO	HD	TR	_____
06/17/22	8882871	Respond to investor emails regarding receivership	Pham, Matt D.	0.50	222.50	2,358.50	WO	HD	TR	_____
06/21/22	8882939	Phone call with investor regarding information relating to undisclosed properties	Pham, Matt D.	1.30	578.50	2,937.00	WO	HD	TR	_____
06/22/22	8882956	Phone call with investor regarding receivership inquiry	Pham, Matt D.	0.10	44.50	2,981.50	WO	HD	TR	_____
06/27/22	8883015	Respond to emails from investors regarding inquiries (0.1); Phone call with investor regarding new information on undisclosed property (0.2)	Pham, Matt D.	0.30	133.50	3,115.00	WO	HD	TR	_____

Proforma Summary

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
002510	Pham, Matt D.	7.00	445.00	3,115.00
		7.00		\$3,115.00
Subtotal Fees				\$3,115.00
Discount				0.00
Total Fees				3,115.00
Total Disbursements				0.00

Attorney Billing Instructions

- | | |
|--------------------|------------------|
| () BILL ALL | () Hold |
| () BILL FEES ONLY | () Write Off |
| () BILL COST ONLY | () Transfer All |

07/11/22 10:06:45 PROFORMA STATEMENT FOR MATTER 392775.00005 (WINKLER, GEOFF | Receiver for J&J Consul) (Investor Issues & Communications)

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	3,115.00	3,115.00	0.00	3,115.00	3,115.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	3,115.00	3,115.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

07/11/22 10:06:46 PROFORMA STATEMENT FOR MATTER 392775.00006 (WINKLER, GEOFF | Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Joshua Matter #: 392775.00006 Client Name: WINKLER, GEOFF | Receiver for J&J Consul
 Date of Last Billing: Matter Name: Sale, Disposition & Transfer of Assets
 Proforma Number: 1169825
 Client/Matter Joint Group # 392775.1 Client Matter Number:

Fees for Matter 392775.00006.(Sale, Disposition & Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/16/22	8864395	Legal analysis in anticipation of motion to approve personal property sales (1.0); commence preparation of motion regarding same (0.9).	Del Castillo, Joshua	1.90	1,035.50	1,035.50	WO	HD	TR	_____
06/20/22	8867412	Advise on issues and strategy for sale of receivership real property	Fates, Edward (Ted)	0.30	163.50	1,199.00	WO	HD	TR	_____
06/20/22	8871530	Email communications and conferences, advice to counsel related to sale of the assets, including personal and real properties.	Zaro, David	0.60	327.00	1,526.00	WO	HD	TR	_____
06/22/22	8870685	Emails and teleconference with Receiver and counsel regarding anticipated sales of receivership property (0.5); continue preparation of motions for same (0.7); inquiries to counsel regarding sale of aviation assets and review materials in connection with same (0.5).	Del Castillo, Joshua	1.70	926.50	2,452.50	WO	HD	TR	_____
06/23/22	8871719	Confer with Receiver and counsel regarding draft motions for authority sell receivership	Del Castillo, Joshua	3.40	1,853.00	4,305.50	WO	HD	TR	_____

07/11/22 10:06:46 PROFORMA STATEMENT FOR MATTER 392775.00006 (WINKLER, GEOFF | Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Fees for Matter 392775.00006.(Sale, Disposition & Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		assets, revise draft motion to sell personal property and transmit to Receiver, confer regarding private aircraft sales and analysis of issues regarding same, and attention to real property sale matters (3.4).								
06/23/22	8872211	Review of pleadings	Woods, Shauna E.	0.20	89.00	4,394.50	WO	HD	TR	_____
06/23/22	8880721	Conferences, analysis, review of materials and exchange of e-mails re: asset sale strategy/timing and potential motion to approve sale procedures.	Farrell, Michael	1.30	708.50	5,103.00	WO	HD	TR	_____
06/24/22	8872612	Emails with counsel and Receiver's office regarding prospective asset sales (0.5); review documents in connection with same (1.1); legal analysis of Receiver's proposed aircraft sale and review materials for same (1.6).	Del Castillo, Joshua	3.20	1,744.00	6,847.00	WO	HD	TR	_____
06/24/22	8873459	Draft motion for approval of property sale procedures	Woods, Shauna E.	1.30	578.50	7,425.50	WO	HD	TR	_____
06/24/22	8880819	Reviewed form property sale procedures motion and related documents (.4); telephone conference and analysis re: motion issues and strategy (.3).	Farrell, Michael	0.70	381.50	7,807.00	WO	HD	TR	_____
06/27/22	8874496	Review and revise draft aircraft purchase and sale agreement and correspondence regarding same (3.1).	Del Castillo, Joshua	3.10	1,689.50	9,496.50	WO	HD	TR	_____
06/27/22	8875693	Review, analysis and revision of draft motion to approve real property sale procedures and exchanged e-mails re:	Farrell, Michael	1.30	708.50	10,205.00	WO	HD	TR	_____

07/11/22 10:06:46 PROFORMA STATEMENT FOR MATTER 392775.00006 (WINKLER, GEOFF | Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Fees for Matter 392775.00006.(Sale, Disposition & Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/28/22	8876302	Revise draft personal property sale motion to address private aircraft and deliver draft to Receiver for review and comment (1.7).	Del Castillo, Joshua	1.70	926.50	11,131.50	WO	HD	TR	_____
06/28/22	8877052	Conference and analysis re: real property procedures motion, defense attacks on appointment, and effect of same on strategy going forward.	Farrell, Michael	0.50	272.50	11,404.00	WO	HD	TR	_____
06/29/22	8877934	Review and revise asset sale motions and confer with counsel and Receiver regarding same (2.6).	Del Castillo, Joshua	2.60	1,417.00	12,821.00	WO	HD	TR	_____
06/30/22	8880290	Review and respond to SEC correspondence regarding property sales (0.1); revise documents and deliver anticipated final draft of personal property sale motion to Receiver for approval (0.5); confer with counsel regarding status of real property sale motion (0.2).	Del Castillo, Joshua	0.80	436.00	13,257.00	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	545.00	327.00
000739	Farrell, Michael	3.80	545.00	2,071.00
001665	Fates, Edward (Ted)	0.30	545.00	163.50
001842	Del Castillo, Joshua	18.40	545.00	10,028.00
002494	Woods, Shauna E.	1.50	445.00	667.50
		24.60		\$13,257.00
Subtotal Fees				\$13,257.00
Discount				0.00
Total Fees				13,257.00

07/11/22 10:06:46 PROFORMA STATEMENT FOR MATTER 392775.00006 (WINKLER, GEOFF | Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Total Disbursements				0.00

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,888.50	2,888.50	0.00	16,690.50	16,690.50	0.00	16,690.50	16,690.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	16,690.50	16,690.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC

07/11/22 10:06:46 PROFORMA STATEMENT FOR MATTER 392775.00006 (WINKLER, GEOFF | Receiver for J&J Consul) (Sale, Disposition & Transfer of Assets)

715 NW Hoyt Street, Suite 4364
Portland, OR 97208

07/11/22 10:06:48 PROFORMA STATEMENT FOR MATTER 392775.00007 (WINKLER, GEOFF | Receiver for J&J Consul) (Pending Litigation)

Preliminary Billing Form

Billing Atty: 001842 - Del Castillo, Matter #: 392775.00007 Client Name: WINKLER, GEOFF | Receiver for J&J Consul
 Joshua
 Date of Last Billing: Matter Name: Pending Litigation
 Proforma Number: 1169825
 Client/Matter Joint Group # 392775.1 Client Matter Number:

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/06/22	8882627	Begin reviewing and analyzing bankruptcy filings from J&J Consulting and J&J Purchasing chapter 11 cases (2.0); Continue reviewing and analyzing various bankruptcy filings from J&J entities' bankruptcy case (1.8); Phone call to U.S. Trustee's office regarding J&J bankruptcy cases; draft follow up email to U.S. Trustee's office regarding same (0.3); Continue reviewing relevant filings from J&J bankruptcy cases (1.0)	Pham, Matt D.	5.10	2,269.50	2,269.50	WO	HD	TR	_____
06/07/22	8882647	Continue reviewing and analyzing relevant bankruptcy filings (0.6); Phone call with U.S. Trustee's attorney regarding 341(a) meeting and receiver's appointment (0.2); Draft email to Geoff Winkler and team regarding update on bankruptcy cases (0.2)	Pham, Matt D.	1.00	445.00	2,714.50	WO	HD	TR	_____
06/08/22	8882668	Review and analyze filings from five adversary proceedings relating to J&J bankruptcy cases (1.8); Phone call with U.S. Trustee's attorney regarding 341(a) meeting and other matters in J&J	Pham, Matt D.	2.70	1,201.50	3,916.00	WO	HD	TR	_____

07/11/22 10:06:48 PROFORMA STATEMENT FOR MATTER 392775.00007 (WINKLER, GEOFF | Receiver for J&J Consul) (Pending Litigation)

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		bankruptcy cases (0.1); Draft email to Geoff Winkler regarding 341(a) meeting and next steps for bankruptcy cases (0.2); Confer with David Zaro regarding potential approaches for bankruptcy cases (0.6)								
06/09/22	8882684	Telephonically attend 341(a) meeting for J&J entities (0.1); Phone call with Ori Katz (unsecured creditors committee's counsel) regarding receivership and bankruptcy cases (0.1); Phone call with petitioning creditors' counsel regarding receivership (0.2)	Pham, Matt D.	0.40	178.00	4,094.00	WO	HD	TR	_____
06/14/22	8882793	Review and analyze emails from Debtors' counsel regarding Rule 2004 exams (0.3); Phone calls with Debtors' counsel regarding Rule 2004 exams (0.1); Confer with David Zaro regarding approach to Rule 2004 exams (0.1); Phone call with Greg Garman regarding his assessment of J&J bankruptcy cases (0.5)	Pham, Matt D.	1.00	445.00	4,539.00	WO	HD	TR	_____
06/15/22	8882828	Phone call with Brett Axelrod (counsel for state court receiver) regarding bankruptcy cases (0.2); Phone call with Greg Garman regarding J&J bankruptcy cases (0.1)	Pham, Matt D.	0.30	133.50	4,672.50	WO	HD	TR	_____
06/16/22	8882843	Phone call with Peter Kravitz (Debtors' CRO) and Greg Garman regarding bankruptcy cases and analysis/assessment (0.9); Phone call with Ori Katz (committee counsel) regarding bankruptcy cases and his analysis/assessment thereof (0.4)	Pham, Matt D.	1.30	578.50	5,251.00	WO	HD	TR	_____

07/11/22 10:06:48 PROFORMA STATEMENT FOR MATTER 392775.00007 (WINKLER, GEOFF | Receiver for J&J Consul) (Pending Litigation)

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/17/22	8882880	Review various bankruptcy filings; begin drafting notice of agenda for omnibus hearing in bankruptcy cases (1.4); Virtually attend meeting with client and SEC regarding bankruptcy cases (0.5); Continue drafting notice of agenda for omnibus hearing on 12 matters in bankruptcy cases (0.7)	Pham, Matt D.	2.60	1,157.00	6,408.00	WO	HD	TR	_____
06/20/22	8882916	Update and revise notice of agenda for omnibus hearing in bankruptcy cases (0.4); Revise and finalize notice of agenda for omnibus hearing (0.2); Draft email to Geoff Winkler regarding notice of agenda and omnibus hearing (0.2)	Pham, Matt D.	0.80	356.00	6,764.00	WO	HD	TR	_____
06/21/22	8882936	Prepare for omnibus hearing in bankruptcy cases (0.3); Telephonically attend omnibus hearing (0.3); Multiple phone calls with Greg Garman regarding next steps in bankruptcy cases (0.2)	Pham, Matt D.	0.80	356.00	7,120.00	WO	HD	TR	_____
06/24/22	8882998	Phone call with Ori Katz (committee counsel) regarding receivership development	Pham, Matt D.	0.10	44.50	7,164.50	WO	HD	TR	_____
06/27/22	8883020	Phone call with Kroll (Debtors' claims/noticing agent) regarding claims register	Pham, Matt D.	0.10	44.50	7,209.00	WO	HD	TR	_____
06/28/22	8883055	Phone call with Ori Katz (committee counsel) regarding update on bankruptcy report	Pham, Matt D.	0.10	44.50	7,253.50	WO	HD	TR	_____
06/29/22	8883074	Review and analyze case law provided by U.S. Trustee regarding receivership vs.	Pham, Matt D.	0.60	267.00	7,520.50	WO	HD	TR	_____

07/11/22 10:06:48 PROFORMA STATEMENT FOR MATTER 392775.00007 (WINKLER, GEOFF | Receiver for J&J Consul) (Pending Litigation)

Fees for Matter 392775.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		bankruptcy (0.3); Phone call with U.S. Trustee regarding bankruptcy report and outstanding issues in bankruptcy cases (0.2); Phone call with U.S. Trustee regarding quarterly fees (0.1)					

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002510	Pham, Matt D.	16.90	445.00	7,520.50
		16.90		\$7,520.50
Subtotal Fees				\$7,520.50
Discount				0.00
Total Fees				7,520.50
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	7,520.50	7,520.50	0.00	7,520.50	7,520.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

07/11/22 10:06:48 PROFORMA STATEMENT FOR MATTER 392775.00007 (WINKLER, GEOFF | Receiver for J&J Consul) (Pending Litigation)

AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	7,520.50	7,520.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J
 Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

07/11/22 10:06:50 PROFORMA STATEMENT FOR MATTER 392775.00009 (WINKLER, GEOFF | Receiver for J&J Consul) (Third Party Claims & Recoveries)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00009

Client Name: WINKLER, GEOFF | Receiver for J&J Consul

Date of Last Billing:

Matter Name: Third Party Claims & Recoveries

Proforma Number: 1169825

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00009.(Third Party Claims & Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/22/22	8873207	Emails wiht class counsel and analysis in preparation for call with the Receiver to assess approach (1.2). Call with Receiver to address third party litigation strategy/issues and follow-up (.7).	Zaro, David	1.90	1,035.50	1,035.50	WO	HD	TR	_____
06/22/22	8880551	Conference and analysis re: potential third party pursuit and issues to be addressed re: same.	Farrell, Michael	0.40	218.00	1,253.50	WO	HD	TR	_____
06/23/22	8873241	Attend conference call with counsel for third party investor claimants and follow-up thereon to address the strategy/receiver interests and approach to prospective claims (1.2). Email to Receiver as to litigation issues/coordination and apporach (.4).	Zaro, David	1.60	872.00	2,125.50	WO	HD	TR	_____
06/23/22	8880725	Conference, analysis, review of materials and exchange of e-mails re: prospective conflicts counsel for third party claims.	Farrell, Michael	0.70	381.50	2,507.00	WO	HD	TR	_____
06/30/22	8883190	Analysis and exchange of e-mails re: conflicts counsel issues.	Farrell, Michael	0.30	163.50	2,670.50	WO	HD	TR	_____

07/11/22 10:06:50 PROFORMA STATEMENT FOR MATTER 392775.00009 (WINKLER, GEOFF | Receiver for J&J Consul) (Third Party Claims & Recoveries)

Fees for Matter 392775.00009.(Third Party Claims & Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
Proforma Summary							
Timekeeper							
Number		Timekeeper		Hours	Rate	Amounts	
000313		Zaro, David		3.50	545.00	1,907.50	
000739		Farrell, Michael		1.40	545.00	763.00	
				<u>4.90</u>		<u>\$2,670.50</u>	
Subtotal Fees						\$2,670.50	
Discount						0.00	
Total Fees						2,670.50	
Total Disbursements						0.00	

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 07/06/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,744.00	1,744.00	0.00	4,414.50	4,414.50	0.00	4,414.50	4,414.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	4,414.50	4,414.50	0.00						

07/11/22 10:06:50 PROFORMA STATEMENT FOR MATTER 392775.00009 (WINKLER, GEOFF | Receiver for J&J Consul) (Third Party Claims & Recoveries)

Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

WINKLER, GEOFF | Receiver for J&J Consulting Services, Inc.; J and J
Purchasing LLC; The Judd Irrevocable Trust; BJ Holdings LLC
Geoff B. Winkler
American Fiduciary Services LLC
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

EXHIBIT “4”

**DECLARATION OF JARROD L. RICKARD, ESQ. IN
SUPPORT OF AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S PROFESSIONALS FOR
ALLOWANCE AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3, 2022**

THROUGH JUNE 30, 2022

Pages 1-8

UNITED STATES DISTRICT COURT

Case No. 2:22-cv-00612-CDS-EJY

EXHIBIT “4”

**DECLARATION OF JARROD L. RICKARD, ESQ. IN
SUPPORT OF AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S PROFESSIONALS FOR
ALLOWANCE AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3, 2022**

THROUGH JUNE 30, 2022

Pages 1-8

GREENBERG TRAURIG,
LLP
10845 Griffith Peak

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 JASON K. HICKS, Bar No. 13149
hicksja@gtlaw.com
3 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
4 **GREENBERG TRAURIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
6 Telephone: (702) 792-3773
Facsimile: (702) 792-9002

7
8 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
9 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
10 **SEMENZA KIRCHER RICKARD**
10161 Park Run Drive, Suite 150
11 Las Vegas, Nevada 89145
Telephone: (702) 835-6803
12 Facsimile: (702) 920-8669

13 *Attorneys for Receiver, Geoff Winkler*

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

14
15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE DISTRICT OF NEVADA**

17 SECURITIES AND EXCHANGE COMMISSION,

CASE NO. 2:22-cv-00612-CDS-EJY

18 Plaintiff,

19 vs.

**DECLARATION OF JARROD L.
RICKARD, ESQ. IN SUPPORT OF
THE RECEIVER’S AMENDED FIRST
APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND
COSTS FOR THE PERIOD JUNE 3,
2022 THROUGH JUNE 30, 2022**

20 MATTHEW WADE BEASLEY, *et al.*,

21 Defendants,

22 THE JUDD IRREVOCABLE TRUST, *et al.*,

23 Relief Defendants.

24
25 I, JARROD L. RICKARD, state and declare as follows:

26 1. I am a Partner with Semenza Kircher Rickard. I make the following Declaration in
27 support of the Receiver’s Amended First Application for Allowance and Payment of Fees and
28 Costs for the Period June 3, 2022, Through June 30, 2022 (the “Amended Application”). My firm

1 is counsel of record for Geoff Winkler (the "Receiver"), the Court-appointed receiver in CASE
2 NO. 2:22-cv-00612-CDS-EJY pending before this Court. I have personal knowledge of the facts
3 contained in this Declaration and if called to do so, would testify competently thereto.

4 2. As reflected in the concurrently filed Amended Application, Semenza Kircher
5 Rickard has endeavored to staff all tasks undertaken in this matter efficiently, using paralegals
6 wherever appropriate. In addition, as reflected in prior submissions to the Court, Semenza Kircher
7 Rickard agreed to a significant discount from its ordinary billing rates for this matter. Accordingly,
8 the fees identified in the Amended Application were billed at rates reflecting significant discounts,
9 thereby resulting in a substantial savings for the receivership estate.

10 3. Attached hereto as **Exhibit A** is a true and correct copy of the invoice containing
11 the billing entries detailing the tasks performed by Semenza Kircher Rickard's attorneys and
12 paralegals during the Amended Application Period. Semenza Kircher Rickard respectfully
13 requests that the Court approve the fees and costs reflected in the invoice and approve payment in
14 the amounts reflected in the Amended Application.

15 4. In accordance with the Billing Guidelines promulgated by the plaintiff Securities
16 and Exchange Commission (the "Commission"), on behalf of Semenza Kircher Rickard, I certify
17 as follows:

- 18 a. I have read the Amended Application;
- 19 b. To the best of my knowledge, information and belief formed after reasonable
20 inquiry, the Amended Application and all fees and expenses therein are true and
21 accurate and comply with the Billing Instructions for Receivers in Civil Actions
22 Commenced by the plaintiff Securities and Exchange Commission;
- 23 c. Semenza Kircher Rickard's fees reflected in the Amended Application are
24 based on the rates listed in Semenza Kircher Rickard's fee schedule for this
25 matter, subject to increases disclosed to the Securities and Exchange
26 Commission, and approved by the Court prior to any such increase. All fees
27 contained in the Amended Application are reasonable, necessary and
28 commensurate with the skill and experience required for the activity performed

GREENBERG TRAURIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

and are subject to Court approval. Indeed, as reflected in the Amended Application, Semenza Kircher Rickard has substantially discounted its hourly rates for all timekeepers staffed on this matter. In addition, and in order to maximize the value of its services to the receivership estate, Semenza Kircher Rickard has endeavored to avoid duplication of effort with the Receiver and co-counsel, and consistently strives to staff all matters in as efficient a manner as possible, utilizing personnel best suited to each task, consistent with the complexity and demands of the task;

- d. Semenza Kircher Rickard has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission);
- e. In seeking reimbursement for a service which Semenza Kircher Rickard 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), Semenza Kircher Rickard requests reimbursement only for the amount billed to Semenza Kircher Rickard by the third-party vendor and paid by Semenza Kircher Rickard to such vendor. If such services are performed by the Semenza Kircher Rickard or its retained personnel, the Semenza Kircher Rickard or its retained personnel, as appropriate, will certify that it is not making a profit on such reimbursable service.

5. As reflected in the Amended Application, Semenza Kircher Rickard is sensitive to the comments received from the Commission concurrently with the Receiver's filing of the original version of the Application. Semenza Kircher Rickard is also sensitive to, and intends to satisfy to the best of its ability, this Court's directives in connection with applications for fees and reimbursement of expenses. To that end, and in addition to the substantial discounts Semenza

1 Kircher Rickard is applying to all timekeepers in this matter, Semenza Kircher Rickard is
2 implementing additional procedures to further improve and maximize the clarity of its billing
3 entries.

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

6 DATED this 14th day of September, 2022 in Clark County, Nevada.

7
8 */s/ Jarrod Rickard*
9 JARROD L. RICKARD, ESQ.

10
11
12 GREENBERG TRAUIG,
13 LLP
14 10845 Griffith Peak
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

Statement

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669

Date: 7/24/2022

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Open Invoices Now Due \$7,006.50

Date	Open Invoice	Balance Remaining	Total Due
07/11/2022	7092-01 Receiver in Nevada Actions- INV #7092-01_01. Orig. Amount \$7,006.50.	7,006.50	7,006.50

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 7/11/2022
 Invoice Number 7092-01_01
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 6/30/2022

Date	Employee	Description	Hours	Rate	Amount
6/15/2022	O Kelly	PROFESSIONAL FEES Review e-mails and pro hac vice applications from client for USDC Nevada and USBC Nevada; revise same; work with J Rickard/client re same; review executed fee agreement	1.9	145.00	275.50
6/15/2022	J Rickard	Reviewing pro hac vice materials	0.4	375.00	150.00
6/16/2022	O Kelly	Review e-mail from client re pro hac vice applications; work with J Rickard/client re same; telephonic meeting with J Rickard/client re same; revise pro hac vice applications; draft designation of local counsel for bankruptcy court; review bankruptcy court case dockets and information	2.0	145.00	290.00
6/16/2022	J Rickard	Conference call regarding pro hac vices; research regarding same	0.7	375.00	262.50
6/20/2022	O Kelly	File pro hac vice applications and designations of local counsel for D Zaro and M Pham in USDC Nevada and USBC Nevada; work with client/J Rickard re same	2.2	145.00	319.00
6/20/2022	J Rickard	Review notice of agenda and agenda; e-mail regarding omnibus bankruptcy hearing	0.5	375.00	187.50
6/21/2022	O Kelly	Review USBC certificates of service; file notice of agenda re omnibus hearing in USBC case #22-10942; review minute order from USDC re judge recusal; review notice from USDC with new judge assignment; file pro hac vice applications for J del Castillo; review orders granting USBC case #22-10942 pro hac vice applications for M Pham and D Zaro	1.6	145.00	232.00
6/21/2022	J Rickard	Prepare for and participate in omnibus hearing; draft motion to employ	2.8	375.00	1,050.00
6/22/2022	O Kelly	Review bankruptcy cases minute orders re continued omnibus hearing; work with client/bankruptcy court re notifications for pro hac vice counsel; review orders granting pro hac vice applications for all attorneys in case 22-10943 and the pro hac vice application for J del Castillo in case 22-10942; review orders granting pro hac vice applications for all attorneys in the USDC SEC case; work with client re case	1.1	145.00	159.50
6/22/2022	J Rickard	Finalize motion to employ; e-mail regarding same; research regarding Nevada elisor basis	1.3	375.00	487.50
6/23/2022	O Kelly	Review notice of appearance and request for special notice for J Hall in USBC Nevada case number 22-10942; file motion to employ conflicts counsel and J Rickard declaration in support of motion to employ conflicts counsel	0.8	145.00	116.00
6/24/2022	O Kelly	Review certificates of service re orders granting pro hac vice applications and docketing error re notice of appearance in USBC Nevada case 22-10942; work with client re e-filing notifications	0.4	145.00	58.00
6/27/2022	J Rickard	Conference call regarding procedure for setting hearings in federal district court	0.4	375.00	150.00
6/27/2022	O Kelly	Review certificates of service re orders granting pro hac vice applications in USBC case 22-10942 and 22-10943; review pro hac vice application and order granting same for D Hill, motion to dismiss and amended certified statement in case 22-cv-00612; review -e-mails between counsel re filing for Friday	0.3	145.00	43.50
6/28/2022	O Kelly	Review motion to clarify order re receiver, for fund for attorneys fees and for leave to withdraw and notice of in camera submission	0.2	145.00	29.00

Total Current Invoice

LAWRENCE J SEMENZA, III, P.C.
 dba SEMENZA KIRCHER RICKARD
 10161 Park Run Drive, Suite 150

American Financial Services
 c/o Geoff Winkler
 2300 West Sahara Avenue, Suite 822
 Las Vegas, NV 89102
 Receiver for J&J Consulting Services, Inc

Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669
 Federal I.D. # 27-4465751

Date 7/11/2022
 Invoice Number 7092-01_01
 Client Number 7092
 Matter Number 01

RE: Receiver in Nevada Actions

BILL THROUGH DATE 6/30/2022

Date	Employee	Description	Hours	Rate	Amount
6/29/2022	J Rickard	Review draft of Receiver's status report; e-mail regarding procedure for hearing setting	0.9	375.00	337.50
6/29/2022	O Kelly	Review proofs of claims and notice of appearance and request for special notice for J Hall in USBC case 22-10942; review amended complaint in USDC case 22-00612; work on cases/e-service notifications; review e-mail from client re USBC call	1.5	145.00	217.50
6/30/2022	O Kelly	Review e-mails between J Rickard/client re USDC case/call to chambers; work on case/call to chambers; e-mails with M Diaz re USDC case; telephone calls with USDC clerk's office re J del Castillo attorney CM/ECF registration and motions filings/hearings; telephone call with M Pham/USDC chambers re procedures for motions filings/hearing dates to be issued for same; review proofs of claims and supplemental affidavit of service in bankruptcy cases	2.7	145.00	391.50
		Subtotal			4,756.50
		EXPENSES/COSTS			
6/20/2022		USDC Pro Hac Vice Application Fee for David Zaro		250.00	250.00
6/20/2022		USDC Pro Hac Vice Application Fee for Matthew Pham		250.00	250.00
6/20/2022		USDC #22-10942 Pro Hac Vice Application Fee for David Zaro		250.00	250.00
6/20/2022		USDC #22-10942 Pro Hac Vice Application Fee for Matthew Pham		250.00	250.00
6/20/2022		USDC #22-10943 Pro Hac Vice Application Fee for David Zaro		250.00	250.00
6/20/2022		USDC #22-10943 Pro Hac Vice Application Fee for Matthew Pham		250.00	250.00
6/21/2022		USDC Pro Hac Vice Application Fee for Joshua del Castillo		250.00	250.00
6/21/2022		USDC #22-10942 Pro Hac Vice Application Fee for Joshua del Castillo		250.00	250.00
6/21/2022		USDC #22-10943 Pro Hac Vice Application Fee for Joshua del Castillo		250.00	250.00
		Subtotal			2,250.00

Total Current Invoice \$7,006.50

EXHIBIT “5”

**[PROPOSED] ORDER APPROVING AMENDED FIRST
APPLICATION OF RECEIVER AND RECEIVER'S
PROFESSIONALS FOR ALLOWANCE AND PAYMENT OF
FEES AND COSTS FOR THE PERIOD FROM JUNE 3, 2022
THROUGH JUNE 30, 2022**

Pages 1-2

UNITED STATES DISTRICT COURT

Case No. 2:22-cv-00612-CDS-EJY

EXHIBIT “5”

**[PROPOSED] ORDER APPROVING AMENDED FIRST
APPLICATION OF RECEIVER AND RECEIVER'S
PROFESSIONALS FOR ALLOWANCE AND PAYMENT OF
FEES AND COSTS FOR THE PERIOD FROM JUNE 3, 2022
THROUGH JUNE 30, 2022**

Pages 1-2

GREENBERG TRAURIG,
LLP
10845 Griffith Peak

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

Attorneys for Receiver, Geoff Winkler

DAVID R. ZARO*
dzaro@allenmatkins.com
JOSHUA A. del CASTILLO*
jdelcastillo@allenmatkins.com
MATTHEW D. PHAM*
mpham@allenmatkins.com
*admitted *pro hac vice*
**ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**
865 South Figueroa Street
Suite 2800
Los Angeles, California 90017-2543
Telephone: (213) 622-5555
Facsimile: (213) 620-8816

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY, *et al.*,

Defendants,

THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

CASE NO. 2:22-cv-00612-CDS-EJY

**[PROPOSED] ORDER APPROVING
AMENDED FIRST APPLICATION OF
RECEIVER AND RECEIVER'S
PROFESSIONALS FOR ALLOWANCE
AND PAYMENT OF FEES AND COSTS
FOR THE PERIOD FROM JUNE 3,
2022 THROUGH JUNE 30, 2022**

The Court having heard the First Application of Receiver and Receiver’s Professionals for Allowance and Payment of Fees and Costs for the Period From June 3, 2022 through June 30, 2022 and having reviewed the Amended First Application (the “Application”), the Court having found that notice was proper and that good cause exists to approve the Application,

1 IT IS ORDER THAT the Application (ECF No. ____) is GRANTED and:

- 2 (1) Receiver, Geoff Winkler and American Fiduciary Serves fees of \$133,276.00 and
3 costs of \$16,863.59 are allowed;
- 4 (2) Greenberg Traurig fees of \$83,137.58 and costs of \$243.69 are allowed;
- 5 (3) Allen Matkins fees of \$114,700.00 and costs of \$1,360.00 are allowed;
- 6 (4) Semenza Kircher fees of \$4,756.50 and costs of \$2,250.00 are allowed; and
- 7 (5) The Receiver is authorized to pay 80% of the allowed fees and 100% of the allowed
8 costs from funds on hand in the receivership estate.

9 **IT IS SO ORDERED.**

10 _____
11 United States District Court Judge

12 Dated: _____
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

GREENBERG TRAURIG,
LLP
10845 Griffith Peak