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12 KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15  
16 SECURITIES AND EXCHANGE  
17 COMMISSION,

18 Plaintiff,

19 vs.

20 INTEGRATED NATIONAL  
RESOURCES, INC. dba  
21 WEEDGENICS, ROLF MAX  
HIRSCHMANN aka "MAX  
22 BERGMANN," PATRICK EARL  
WILLIAMS,

23 Defendants, and,

24 WEST COAST DEVELOPMENT LLC,  
25 INR CONSULTING LLC (WYOMING  
ENTITY), OCEANS 19 INC.,  
26 AUTOBAHN PERFORMANCE LLC,  
ONE CLICK GENERAL MEDIA INC.,  
27 OPUS COLLECTIVE, JOHN ERIC  
FRANCOM, INR-CA INVESTMENT  
28 HOLDINGS, LLC, MICHAEL  
DELGADO. TOTAL SOLUTION

Case No. 8:23-cv-00855-JWH (KES)

**RECEIVER'S FOURTH INTERIM  
REPORT AND  
RECOMMENDATIONS**

1 CONSTRUCTION LLC, BAGPIPE  
2 HOLDINGS LLC, BAGPIPE  
3 MULTIMEDIA LLC, TYLER  
4 CAMPBELL, INR CONSULTING LLC  
5 (CALIFORNIA ENTITY), HIDDEN  
6 SPRINGS HOLDINGS GROUP LLC,  
7 and ALEXANDRIA PORTER BOVEE  
8 aka "AIA MONTGOMERY",

Relief Defendants.

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1 Krista Freitag (“Receiver”), the Court-appointed permanent receiver for  
2 Defendant INTEGRATED NATIONAL RESOURCES, INC., DBA  
3 WEEDGENICS, And Relief Defendants, WEST COAST DEVELOPMENT LLC,  
4 INR CONSULTING LLC (WYOMING ENTITY), OCEANS 19 INC.,  
5 AUTOBAHN PERFORMANCE LLC, ONE CLICK GENERAL MEDIA INC.,  
6 OPUS COLLECTIVE, INR-CA INVESTMENT HOLDINGS, LLC, TOTAL  
7 SOLUTION CONSTRUCTION LLC, BAGPIPE HOLDINGS LLC, BAGPIPE  
8 MULTIMEDIA LLC, INR CONSULTING LLC (CALIFORNIA ENTITY), AND  
9 HIDDEN SPRINGS HOLDINGS GROUP LLC, and their subsidiaries and affiliates  
10 (collectively the “Receivership Entities” or individually, a “Receivership Entity”)  
11 hereby submits this Fourth Interim Report and Recommendations (“Fourth Interim  
12 Report”).

13 **I. BACKGROUND**

14 On May 19, 2023, this Court entered the Temporary Restraining Order and  
15 Orders: (1) Freezing Assets; (2) Appointing a Temporary Receiver; (3) Requiring  
16 Accountings; (4) Prohibiting the Destruction of Documents; and (5) Granting  
17 Expedited Discovery; and Order to Show Cause why a Preliminary Injunction  
18 should not be Granted and a Permanent Receiver should not be Appointed. (the  
19 “Temporary Restraining Order” or “TRO”). (Dkt. 17).

20 Subsequently, the Court entered Preliminary Injunction Orders as follows:

- 21 1. June 2, 2023 - as to Defendants Integrated National Resources Inc. dba  
22 WeedGenics (“INR”), Rolf Max Hirschmann aka “Max Bergmann”  
23 (“Hirschmann”), and Patrick Earl Williams (“Williams”) (collectively,  
24 “Defendants”), and various Relief Defendants, including West Coast Development  
25 LLC (“WCD”), INR Consulting LLC (Wyoming Entity) (“INR  
26 Consulting/Williams”), Oceans 19 Inc. (“Oceans 19”), Autobahn Performance LLC  
27 (“Autobahn”), One Click General Media Inc. (“One Click”), and Opus Collective  
28

1 (“Opus”). Dkt. 33. This order made the receivership permanent as to the listed  
2 entities.

3 2. June 9, 2023 – as to Relief Defendants Michael Delgado, Total  
4 Solution Construction LLC (“TSC”), Bagpipe Holdings LLC (“Bagpipe Holdings”)  
5 and Bagpipe Multimedia LLC (“Bagpipe MM”). Dkt. 48. This order made the  
6 receivership permanent as to TSC, Bagpipe Holdings, and Bagpipe MM.

7 3. June 9, 2023 – as to Relief Defendants Tyler Campbell, INR  
8 Consulting LLC (California Entity) (“INRC”), and Hidden Springs Holdings Group  
9 LLC (“Hidden Springs”). (Dkt. 49). This order made the receivership permanent as  
10 to INRC and Hidden Springs.

11 4. June 29, 2023 - as to Relief Defendants John Eric Francom and INR-  
12 CA Investment Holdings, LLC’s (“INR-CA”) Joint Stipulated Request for a  
13 Preliminary Injunction Order and Orders: (1) Freezing Assets; (2) Appointing a  
14 Permanent Receiver; and (3) Prohibiting the Destruction of Documents. (Dkt. 95).  
15 This order made the receivership permanent as to INR-CA.<sup>1</sup>

16 5. July 13, 2023 – as to Relief Defendant Alexandria Porter Bovee AKA  
17 “Aia Montgomery.”

18 On June 29, 2023, the Court issued an Order Approving Stipulation  
19 Regarding Limited Modification to Preliminary Injunction Order with Respect to  
20 Certain Defendants and Relief Defendants and Orders: (1) Freezing Assets; (2)  
21 Appointing A Permanent Receiver; (3) Requiring Accountings; And (4) Prohibiting  
22 The Destruction Of Documents (“Hirschmann Stipulation”) (Dkt 93). The  
23 stipulation allowed Defendant Hirschmann to remain in possession of two  
24 residential properties located in Boise, Idaho occupied by Hirschmann, his wife, and  
25 his father, as well as two vehicles owned by Autobahn (the properties were to be  
26 vacated and the vehicles turned over to the Receiver no later than September 20,  
27

28 <sup>1</sup> On November 28, 2023, the Court granted the unopposed motion of Relief  
Defendant Francom to lift the freeze on his personal assets.

1 2023). On September 14, 2023, Defendant Hirschman filed an Ex Parte Application  
2 for Modification of Order Approving Stipulation For Limited Modification to  
3 Preliminary Injunction with Respect to Certain Defendants and Relief Defendants,  
4 (Dkt 155) seeking to delay turnover of the real properties to the Receiver. On  
5 September 25, 2023, the Court issued an Order Denying this Ex Parte Application  
6 (Dkt 160), requiring prompt turnover of the real properties.

7 On July 6, 2023, the Receiver filed her Motion for Order in Aid of  
8 Receivership (Dkt. 107), and on July 28, 2023, the Court granted this motion (Dkt.  
9 125), which among other things authorizes the Receiver to engage the law firm of  
10 Allen Matkins Leck Gamble Mallory & Natsis LLP as her general counsel, to  
11 prepare and file interim reports with the Court on a quarterly basis, to provide notice  
12 to all investors, creditors and other interested parties via electronic mail and the  
13 receivership-specific website – [www.INReceivership.com](http://www.INReceivership.com) and grants relief from  
14 Local Rule 66-7.

15 On September 29, 2023, the Receiver filed a Motion for Authority to  
16 (A) Engage Licensed Auctioneers and Dealers to Assist in Selling Personal  
17 Property, (B) Sell Automobiles, Jewelry and Other Personal Property of the  
18 Receivership Entities (C) Engage Brokers to List Real Properties for Sale.  
19 (“Authority to Sell Motion”) (Dkt 162). This motion is pending.

20 On December 1, 2023, the Receiver filed a motion for authority to pursue  
21 certain claims for recovery on behalf of the receivership estate (known as clawback  
22 claims) and for authority to settle such claims within certain parameters (Dkt. 197).  
23 This motion is pending.

24 This quarterly report covers the Receiver’s activities during the fourth quarter  
25 of 2023, including accounting information from inception of the receivership on  
26 May 19, 2023 through December 31, 2023, and also reflects the status of certain  
27 assets as of the date of this report, if material activity has occurred between  
28 December 31, 2023 and the date of this report.

1 **II. EXECUTIVE SUMMARY**

2 In its Complaint, the Commission alleges that from June 2019 to April 2023,  
3 defendants Williams and Hirschman, along with INR raised approximately  
4 \$61.7 million – including over \$22.4 million from November 2022 to April 2023 –  
5 from approximately 350 investors nationwide. The Complaint alleges Defendants  
6 lied about the existence of, revenue from, and permits associated with INR facilities  
7 that supposedly cultivated cannabis in Adelanto, California and Las Vegas, Nevada.  
8 The Complaint further alleges that Defendants fraudulently used investor funds to  
9 enrich themselves rather than to fund their purported business. To date, no evidence  
10 of such cannabis business operations has been found and Defendant Patrick  
11 Williams has admitted there were none.

12 As previously reported, upon entry of the TRO, the Receiver and her team  
13 worked to review as much of the Complaint and evidence submitted by the  
14 Commission as possible. Despite repeated requests for meetings and demands for  
15 turnover of assets, books and records, the cooperation of the Defendants and Relief  
16 Defendants has been very limited. Most of what is known about the Receivership  
17 Entities’ assets and operations has come from gathering and reviewing records from  
18 third parties (including through the issuance of more than a hundred subpoenas). In  
19 fact, nearly all information, assets, books and records the Receiver has recovered or  
20 obtained in this case is a result of her and her team’s subpoena efforts and very  
21 specific inquiries (resulting from the Receiver’s review of third-party  
22 documentation) that she, through counsel, has posed to Defendants and Relief  
23 Defendants. In other words, unless the Receiver has identified them first and then  
24 demanded turnover thereof, assets have not been voluntarily disclosed and/or turned  
25 over to the Receiver. Defendant Williams has not responded to any requests for  
26 information, while Defendant Rolf Hirschmann and Relief Defendants Michael  
27 Delgado and Tyler Campbell have asserted their Fifth Amendment rights. As it  
28 relates to digital records and assets (e.g., websites, emails, company

1 phones/computers, and financial books and records), Defendants and Relief  
2 Defendants have provided minimal information. Through her own efforts, the  
3 Receiver has been able to obtain control over Receivership Entity websites, email  
4 accounts (many of which were empty) and limited financial information. The data  
5 available from these sources is, for the most part, incomplete, deleted/destroyed, or  
6 otherwise non-existent.

7 With limited cooperation and little to no data turned over, the Receiver,  
8 through her counsel, has been forced to issue over 180 subpoenas requesting  
9 information from third parties related to the Receivership Entities and their  
10 investors; this process involves significant time preparing the subpoenas, following  
11 up with subpoena recipients to secure document productions and reviewing the  
12 productions received. These efforts have not only provided the Receiver with  
13 contact information for hundreds of investors and records critical to the  
14 investigation of potential claims against third parties, but also have confirmed the  
15 existence of and to date, provided for the Receiver's recovery of the following  
16 assets:

- 17 • Approximately \$8 million in cash (see Receipts and  
18 Disbursements below),
- 19 • Fourteen (14) mostly exotic and luxury vehicles,
- 20 • Six (6) real properties, and
- 21 • Numerous pieces of jewelry and artwork.

22 During the fourth quarter, the Receiver continued to concentrate efforts on  
23 advancing the forensic accounting, securing the known assets, making preparations  
24 for the sale of the recovered assets pending approval for disposition thereof, and  
25 investigating potential claims and recoveries.

26 As discussed herein, the Receiver and her professionals have made significant  
27 progress, especially considering the minimal cooperation and very limited organic  
28 company data available. However, work remains to be done – notably on



1 completing the forensic accounting, investigating and pursuing claims,<sup>2</sup> the  
2 recovery/monetization of receivership assets,<sup>3</sup> and a claims and distribution process.

3 **III. SUMMARY OF RECEIVER’S ACTIVITIES**

4 **1. Business Operations**

5 Although virtual addresses associated with the Receivership Entities have  
6 been identified, no physical cannabis operations or premises operated or owned by  
7 the Receivership Entities have been located to date. Moreover, no revenue  
8 generated from any cannabis operations has been identified to date.

9 As noted in the Receiver’s initial report, where possible, change of addresses  
10 for the Receivership Entities’ virtual addresses have been completed with the United  
11 States Postal Service (the USPS does not allow change of addresses for commercial  
12 mail receiving agencies – e.g., a UPS Store) to ensure all Entity related mail is  
13 forwarded to the Receiver.

14 The Receiver, through counsel, has issued subpoenas on various electronic  
15 and accounting related software companies in an attempt to recover organic  
16 company related data; however, some of the responses to these subpoenas remain  
17 pending.

18 **2. Funds Recovered to Date**

19 The Receiver promptly notified each bank and known financial institution  
20 identified as having an account associated with the Receivership Entities. Through  
21 December 31, 2023, the Receiver recovered over \$8.0 million from bank accounts  
22 previously controlled by the defendants, legal retainers, a pre-receivership vehicle  
23 deposit, a post-TRO sale of a vehicle owned by Autobahn, and funds withdrawn  
24 from accounts by Mr. Hirschmann (which funds were previously unknown to the  
25

26 \_\_\_\_\_  
27 <sup>2</sup> On December 1, 2023, the Receiver filed a motion for authority to pursue  
28 clawback claims and for approval of proposed procedures (Dkt. 197), which  
motion is pending.

<sup>3</sup> On September 29, 2023, the Receiver filed a motion for authority to sell personal  
and real property assets (Dkt. 162), which motion is pending.

1 Commission, but discovered by the Receiver). See below in the Receipts and  
2 Disbursements section for more detail.

3 The Receiver, through her counsel, has also subpoenaed all known financial  
4 institutions for all account records, which records are necessary for the Receiver to  
5 complete an accounting, as ordered by the Court. The Receiver is still awaiting  
6 responses and follow-up requests from certain financial institutions, but the  
7 Receiver's ongoing accounting work is further discussed below.

### 8 **3. Real Property Assets**

9 Upon entry of the TRO, the Receiver promptly began diligent efforts to  
10 identify, take possession of and protect the physical assets of the Receivership  
11 Entities. The Receiver has confirmed that six (6) real properties (all are residential  
12 except for one (1) commercial storage unit, and each property is part of a  
13 homeowner's association) are owned by Autobahn. These properties are in Boise,  
14 Idaho, Las Vegas, Nevada, and Fort Lauderdale, Florida.

15 The Receiver continues in possession of five (5) of the real properties  
16 including a Fort Lauderdale condo ("Isle of Venice"), a commercial storage unit  
17 ("Summersweet"), two townhomes ("Riverpark" and "Sultana") and a single-family  
18 residence ("Hacienda"). Summersweet, Riverpark, Sultana and Hacienda are all  
19 located in the Boise, Idaho area.

20 During the fourth quarter, the Receiver engaged a local property management  
21 firm to winterize and assist with the winter maintenance of the homes located in the  
22 Boise area. The vendor frequently visits the homes, ensures that snow and debris is  
23 removed from the property as needed, maintains a cool, but not freezing temperature  
24 throughout the homes and reviews the plumbing to ensure that the pipes are  
25 maintained as expected. Additionally, the Receiver received two competing  
26 proposals for the previously discussed repairs at the Hacienda property. The scope  
27 of work proposed by the two contractors includes: (1) closing the wall separating the  
28 kitchen from the garage, (2) completing the outdoor kitchen, (3) completing the

1 minor repairs in the master bathroom and (4) repainting and patching the walls  
2 throughout after Defendant Hirschmann’s vacancy. Items 1, 2 & 3 were previously  
3 in process but were paused at the Receiver’s appointment. Considering the  
4 significant cost of these proposed repairs and previous commentary from the local  
5 brokers regarding the over-improved property, the Receiver is planning to only  
6 commit to the repairs for item 1 and a limited part of item 4.

7 In January 2024, a member of the Receiver’s staff visited the properties in  
8 Idaho and Florida to confirm that the winterization efforts were adequate and that  
9 the properties remained in good condition.

10 In preparation for approval of the sale of these assets, the Receiver with the  
11 assistance of staff has interviewed real estate brokers to list the properties for sale in  
12 Idaho and Florida. As the carrying costs for the homes are significant, the hope is  
13 that they can be marketed and sold promptly upon approval from the Court. It  
14 should, however, be noted that as a part of this interview process, all brokers have  
15 mentioned the strong headwinds facing the current real estate market, including high  
16 interest rates, a smaller pool of buyers at the higher price points, and the general  
17 softening of the real estate market. Additionally, the brokers have commented that  
18 the Riverpark and Hacienda homes, specifically, are over-improved for their area  
19 and comparable homes. Because the improvements at both locations appear to be  
20 highly specific to the tastes of Defendant Hirschmann, they may not be valued by  
21 the general market and thus the funds spent improving these properties may not be  
22 recovered through sales. The Receiver maintains contact with these previously  
23 interviewed brokers to continue to receive local market feedback, as appropriate.

24 The property located in Las Vegas (“Gracemoor”) is currently occupied by a  
25 tenant, Loretta Cruz, who is described by Defendant Hirschmann as a family friend  
26 (although Cruz stated she did not know Hirschmann well). Defendant Hirschmann  
27 provided a copy of a purported lease, however it contains various highly unusual  
28 and non-market terms, including a requirement for payment of a single annual rent

1 payment of \$54,000 in cash just before the Receiver's appointment. Both Defendant  
2 Hirschmann and Ms. Cruz claim this cash payment was made, but no record of the  
3 alleged sum is reflected in any Receivership Entity bank records and Hirschmann  
4 asserted that he could not remember how the funds were spent. The tenant has  
5 engaged counsel and stated that she will vacate the property at the end of the lease  
6 term on March 31, 2024.

7         Additionally, the Gracemoor HOA has notified the Receiver of various  
8 significant alleged violations of the HOA rules related to an unapproved structure  
9 added to the property, among other complaints. Without access to the property, the  
10 Receiver has requested the HOA's patience in responding to the violation letters. In  
11 various communications since her appointment the Receiver has reminded the HOA  
12 of the Court's stay order that prohibits placing a lien on the property. Nonetheless,  
13 on January 17, 2024, the Receiver received a notice from a debt collector  
14 representing the HOA advising of a lien placed on the property due to various  
15 unpaid violation notices. The Receiver, through counsel, demanded that the HOA  
16 remove the lien. On February 1, 2024, the debt collector responded that the lien  
17 would be removed promptly and on February 7, 2014, the Receiver received  
18 confirmation of the lien removal. Finally, the Receiver was notified by a vendor of  
19 a mechanic's lien placed on the property due to non-payment for some security  
20 window screens for the property. The screens have not been installed at the  
21 property. Pursuant to the aforementioned stay order, the Receiver requested the  
22 vendor remove the lien and has issued the vendor a subpoena for records.

23         **4. Personal Property Assets Identified and Recovered to Date**

24         In addition to the real property, the Receiver noted dozens of vehicle  
25 purchases by Receivership Entities or with funds raised from investors. To date, the  
26 Receiver had identified 13 vehicles owned by Autobahn, all but one of which have  
27 been recovered from Defendant Hirschman. Almost immediately after the TRO was  
28 entered on May 19, 2023, Hirschmann sold a Maserati automobile for \$170,000

1 cash (about half of what Autobahn had purchased it for six months earlier). The  
2 Receiver was able to recover the \$170,000, which Hirschmann had instructed the  
3 buyer to wire to a criminal defense law firm.

4 The Receiver is also aware of numerous vehicles owned by Defendants or  
5 Relief Defendants. Relief Defendant Campbell turned over two (2) vehicles to date.  
6 A third vehicle, a Ford Mustang, remains in Relief Defendant Campbell's  
7 possession. The vehicle is believed to have no equity value due to an existing loan  
8 secured by the vehicle. The Receiver also identified and made demand on three (3)  
9 luxury SUV's, which were purchased by Autobahn and gifted by Hirschmann to  
10 three (3) women located throughout the country. Further pursuit of these vehicles  
11 will occur upon approval of the request for authority to pursue clawback claims.

12 Since locating the first vehicle at takeover, the Receiver has coordinated  
13 transport from their locations in Boise, Las Vegas and Southern California and is  
14 holding all 14 vehicles recovered to date in a secured storage facility in Southern  
15 California. The facility regularly maintains the vehicles to ensure that they remain  
16 in running condition.

17 Based on the best information available at this time, the Receiver identified  
18 hundreds of thousands of dollars of jewelry purchases. Approximately thirteen (13)  
19 jewelry pieces have been recovered and secured in a safe deposit box at a Southern  
20 California bank vault. Additionally, four large metal art sculptures weighing  
21 hundreds of pounds are located in the Boise area. After contacting the retailer that  
22 sold the sculptures to Defendant Hirschmann, the value suggested for all pieces was  
23 \$7,500. That said, receipts and discussion with the retailer suggest that over  
24 \$50,000 was paid for the sculptures. Efforts to locate and recover additional jewelry  
25 pieces are ongoing. Attached as **Exhibit A** is a schedule detailing the assets  
26 collected to date, including real property, automobiles, jewelry and artwork.

27 Pending approval of the sale of personal property, and as noted therein, the  
28 Receiver has identified various outlets for the sales of the automobiles and jewelry;

1 however, in doing so, these prospective brokers/auctioneers have also expressed a  
2 softening market for such items (and personal property items are subject to high  
3 retail mark-ups).

4 **5. Real and Personal Property Insurance**

5 The Receiver maintains general liability and property insurance over all the  
6 real properties and during the period, continued to reorganize coverage considering  
7 the current state of the properties as vacant with limited personal property located  
8 therein. The Receiver previously reorganized coverage on the vehicles in her  
9 possession to obtain quality coverage that considered the lack of daily driving on the  
10 vehicles.

11 Coverage for the jewelry was previously placed, however, after determining  
12 that the jewelry would not be worn daily or held in a home environment, the carrier  
13 withdrew the coverage. The Receiver continues to search for coverage that will  
14 cover the jewelry when it is outside of the bank vault and will place coverage before  
15 attempting to sell the pieces. As part of these efforts, the Receiver may engage an  
16 appraisal service to confirm appropriate coverage with a carrier.

17 **6. Other Investments and Loans**

18 After reviewing the banking records and then documents and information  
19 produced by the web hosting company in response to her subpoena, the Receiver  
20 discovered an operating business owned by Raw Sports, LLC (a Hirschmann  
21 controlled entity), which had recently purchased Rari Nutrition (“Rari”). Rari was a  
22 nutritional supplements company largely sold through the Amazon.com website, but  
23 also through its own website at rarinutrition.com.<sup>4</sup> Through various subpoenas, the  
24 Receiver confirmed that Raw Sports, LLC dba Rari was an existing operating  
25 business that Hirschmann purchased through Raw Sports, LLC, just prior to the  
26 Receiver’s appointment with what appears to be investor funds. After the Receiver  
27

28 <sup>4</sup> No known sales occurred through the website and the Receiver disabled the  
capability for sales on it.

1 obtained this information, Hirschmann agreed to turn control of the company and its  
2 operations over to the Receiver. An experienced Amazon.com operations team was  
3 operating the virtual storefront, along with existing product, which consists of  
4 various health/exercise supplements. The Receiver worked with the operations team  
5 and continued to gather information regarding the business to support its operations  
6 (from manufacturing of product inventory to warehouse inventory to insurance).  
7 Unfortunately, the limited sales activity and complete lack of cooperation by the  
8 manufacturer of the supplements has led to a wind-down of operations.

9 While information is limited at this time as to the nature, status and  
10 collectability thereof, the Receiver, with the assistance of counsel is working to  
11 pursue information on material amounts of transfers made to numerous individuals  
12 and companies from Receivership Entities and investor funds, including an alleged  
13 cannabis-related operation located in Oklahoma.

14 **7. Digital Records**

15 Without a physical operation and with very limited cooperation from the  
16 Defendants and Relief Defendants, the Receiver has also been working diligently to  
17 identify any payments to any companies associated with the Receivership Entities.  
18 As part of her effort to identify, obtain, control and preserve the business records  
19 associated with the Receivership Entities, with the assistance of counsel, the  
20 Receiver has also served various vendors, and other third parties (including the  
21 internet service provider, website hosting companies, and other key vendors  
22 believed to service the Receivership Entities) with subpoenas and has made a  
23 demand that they each preserve all electronic and other documents in their  
24 possession, custody or control.

25 Initially, the Receiver took control of six (6) primary domains (ocgm.com,  
26 weedgenics.com, inr.green, wcdev.us, xjus.com, rarinutrition.com), and nine (9)  
27 add-on domains and if applicable, their related email accounts. During the period,  
28 the Receiver took control over an additional 20 domain names associated with

1 Defendant Hirschmann. Hirschmann, through counsel, has asserted that various of  
2 the domains should be outside of the scope of the PI Order. Control over these  
3 accounts allows the Receiver to make a static copy of the primary domain websites  
4 for archival purposes and re-direct any website traffic to the Receiver’s website at  
5 [www.INRreceivership.com](http://www.INRreceivership.com). Out of an abundance of caution, the Receiver has  
6 continued to pay for the annual renewal of all domains until their further utility can  
7 be ascertained. Due to the ongoing expense for many domains which do not appear  
8 to have data associated with them, the Receiver is reorganizing the domains to lower  
9 cost options.

10 In addition to website traffic, the domains are also capable of having  
11 associated email accounts, e.g. [user@inr.green](mailto:user@inr.green) or [user@ocgm.com](mailto:user@ocgm.com). Thus far, the  
12 Receiver noted various instances of the Defendants or Relief Defendants using those  
13 email accounts (e.g. [max@ocgm.com](mailto:max@ocgm.com), [max.bergmann@inr.green](mailto:max.bergmann@inr.green), [max@xjus.com](mailto:max@xjus.com) or  
14 [aia.montgomery@inr.green](mailto:aia.montgomery@inr.green)), however upon taking control of those domains, the  
15 Receiver noted that almost no emails existed in the accounts. Furthermore, the  
16 Receiver has discovered that certain of the receivership entity accounts were deleted  
17 and has been able to trace those deletion efforts to the IP address associated with the  
18 Defendant Hirschmann-occupied Hacienda property shortly after the TRO was  
19 entered.

20 **8. Receipts and Disbursements**

21 The following reflects the cash activity of the receivership estate for the  
22 period from May 19, 2023, through December 31, 2023. A summary of the receipts  
23 and disbursements is as follows:

24 <b>Total Bank Account Balances at</b>	
25 <b>takeover</b>	<b>\$6,541,700</b>
26 Hirschmann Withdrawal Recovery	\$1,090,000
27 Legal Retainer Recovery	\$370,000
28	



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Vehicle Deposit Recovery	\$30,000
Interest Income	\$109,711
Raw Sports Net Operating Revenue	\$45,232
<b>TOTAL RECEIPTS</b>	<b>\$8,186,643</b>
Raw Sports Operating Expenses	(\$37,686)
Real Property Related Expenses (e.g., HOA monthly dues, property taxes, insurance)	(\$79,548)
Vehicle Expenses (e.g., repossession, transportation, security, storage, insurance)	(\$65,677)
General Receivership Expenses (primarily includes asset search related expenses)	(\$30,038)
<b>TOTAL DISBURSEMENTS</b>	<b>(\$212,949)</b>
<b>CASH BALANCE AT DECEMBER 31, 2023</b>	<b>\$7,973,694</b>

As of December 31, 2023, outstanding checks totaled \$989, thus the actual bank balance as of December 31, 2023, was \$7,972,705. Since December 31, 2023, the Receiver has recovered an additional bank account balance of approximately \$39,000.

**9. Investor Communications**

Upon entry of the TRO, the Receiver promptly established a dedicated web page with a link to same on the Receiver’s company’s website which will be used to provide case information, regular updates, and answers to frequently asked questions to investors. The Internet address for the webpage is

1 [www.INRreceivership.com](http://www.INRreceivership.com). In addition, the Receiver is maintaining a dedicated e-  
2 mail address and telephone line for all inquiries.

3 As previously discussed, a complete investor database was not turned over to  
4 the Receiver. As a result, the Receiver promptly posted an initial communication  
5 with investors on the receivership website and proceeded to work diligently to  
6 identify physical mailing addresses for investors through banking records and to  
7 otherwise identify investors through a subpoena to DocuSign – the platform used by  
8 investors to sign subscription agreements. As a result of these efforts, the Receiver  
9 was able to send a physical letter to all known investors for whom addresses were  
10 attainable and given the DocuSign production, the Receiver also believes she should  
11 have email addresses used by all investors who signed subscription agreements.  
12 However, even with this list of investors, until the Receiver completes a forensic  
13 accounting and a claims process, it is possible that the complete list of investors  
14 (and creditors) will remain unknown.

15 The Receiver has also been working to identify any payments to accounting  
16 software, customer relationship manager (CRM) entities, or similar types of  
17 programs. To date, only one such vendor has been identified and a subpoena for  
18 records was issued, response to which has not yet been received.

## 19 **10. Forensic Accounting**

20 While the Receiver and her team are making significant progress on the  
21 Court-ordered forensic accounting, significant work remains to be done. Notably,  
22 one financial institution still has not produced voluminous records in response to the  
23 Receiver's subpoenas and several follow-on requests based on information gleaned  
24 to date have been made, which requests remain pending. Nonetheless, the Receiver  
25 has not yet seen any material transactions incurred by the Receivership Entities  
26 which are associated with revenue generating cannabis operations, but has seen  
27 *material* amounts of credit card payments, payments to numerous (unexplained)  
28 non-investor individuals and entities (mentioned above), payments to investors, cash

1 withdrawals, real and personal property purchases (discussed above), real property  
2 renovation/improvement related expenses, and other personal affect-type  
3 transactions. The forensic accounting efforts to date have also been critical in  
4 assisting with the ongoing investigation of potential third-party claims and  
5 recoveries.

6 Given that no accounting system or data for the companies has been located  
7 or turned over by any of the Defendants or Relief Defendants, the Receiver, through  
8 her counsel, has issued numerous subpoenas to gather banking records (as discussed  
9 above) and is using a project-specific and cost-effective AI software to upload the  
10 tens of thousands of banking transactions into a database. This software is saving  
11 considerable time and expense and will shorten the period of time required to  
12 complete the accounting, which in some complex cases can take many months or  
13 even years (depending on the number of bank accounts and volume of transactions).

#### 14 **IV. PRELIMINARY RECOMMENDATIONS**

15 The Receiver's efforts to marshal and recover assets and relevant  
16 Receivership Entity documents and records are ongoing. In the near term, the  
17 Receiver and her professionals make the following recommendations.

##### 18 **1. Document Recovery Efforts**

19 The Receiver will continue to obtain records from all available sources  
20 identified and associated with the Receivership Entities, including all financial  
21 institutions where the Receivership Entities maintained accounts, as well as from  
22 attorneys and accountants engaged by the Receivership Entities.

##### 23 **2. Receivership Asset Recovery Efforts and Investigation**

24 As appropriate, the Receiver will seek to locate any presently unaccounted for  
25 receivership assets that may exist. As part of her investigation, the Receiver is and  
26 will continue to evaluate claims to pursue recovery of assets of the Receivership  
27 Entities from third parties. The Receiver will seek Court approval before pursuing  
28 any such claims.



# **EXHIBIT A**

**Exhibit A - Schedule of Assets****Real Property Assets:**

	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Description</b>	<b>Notes</b>
1	865 E. Riverpark	Boise	ID	Attached Townhome	Receiver Possession
2	2158 Summersweet	Boise	ID	Commerical Condominium Storage Unit	Receiver Possession
3	21 Isle of Venice	Fort Lauderdale	FL	Condominium	Receiver Possession
4	5963 N. Hacienda	Boise	ID	Single Family Residence	Receiver Possession
5	9641 Sultana	Garden City	ID	Attached Townhome	Receiver Possession
6	7691 Gracemoor	Las Vegas	NV	Single Family Residence	Occupied by Tenant

**Personal Property - Autos:**

	<b>Make</b>	<b>Model</b>	<b>Year</b>	<b>Notes</b>
1	Toyota	Tundra	2021	Surrendered by Hirschmann, in storage
2	Mclaren	620R	2020	Surrendered by Hirschmann, in storage
3	Bentley	Continental	2022	Surrendered by Hirschmann, in storage
4	Aston Martin	DBS	2019	Surrendered by Hirschmann, in storage
5	Mercedes Benz	G Wagon	2022	Surrendered by Hirschmann, in storage
6	BMW	X3	2022	Surrendered by Hirschmann, in storage
7	Mercedes Benz	S AMG	2020	Surrendered by Hirschmann, in storage
8	Lamborghini	Huracan	2022	Surrendered by Hirschmann, in storage
9	Ferrari	F8 Tributo	2022	Surrendered by Hirschmann, in storage
10	Ferrari	488 EVO	2020	Surrendered by Hirschmann, in storage
11	Mercedes Benz	C63 Coupe	2023	Surrendered by Campbell, in storage
12	Kawasaki	Ninja	2022	Surrendered by Campbell, in storage
13	BMW	X5	2022	Surrendered by Hirschmann, in storage
14	BMW	M5	2021	Surrendered by Hirschmann, in storage
15	Ford	Mustang	2019	Held by Campbell, believed to have no value due to outstanding auto loan secured by title to the vehicle.

**Personal Property - Jewelry and Sculptures (all except statues in safe deposit box):**

- 1 Breitling Emergency Mission men's watch
- 2 Breitling Super Ocean men's watch
- 3 Breitling Navitimer PanAM men's watch
- 4 Breitling Special Edition Military Ops men's watch
- 5 Carl Bucherer Travel Tec GMT men's watch
- 6 Breitling Chronomat diamond ladies' watch
- 7 Mikimoto diamond pendant necklace
- 8 Mikimoto diamond pendant earrings
- 9 Mikimoto triple row bracelet
- 10 Hearts of Fire aerial dewdrop twisted bangle
- 11 SC Moonstone pendant necklace
- 12 SC Moonstone pendant earrings
- 13 JBS oval diamond earrings
- 14 Standing Anubis Statue
- 15 Standing Hours Statue
- 16 Standing Knight Statue
- 17 Bugatti Car Statue