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12 KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15  
16 SECURITIES AND EXCHANGE  
COMMISSION,

17 Plaintiff,

18 vs.

19 INTEGRATED NATIONAL  
20 RESOURCES, INC. dba  
WEEDGENICS, ROLF MAX  
21 HIRSCHMANN aka "MAX  
BERGMANN," PATRICK EARL  
22 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  
CONSTRUCTION LLC. BAGPIPE

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

**SECOND INTERIM FEE  
APPLICATION OF ALLEN  
MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP,  
GENERAL COUNSEL TO THE  
RECEIVER, KRISTA L. FREITAG,  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES**

Date: April 19, 2024  
Time: 9:00 a.m.  
Ctrm: 9D  
Judge: Hon. John W. Holcomb

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

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9 Relief Defendants.  
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1 Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”),  
2 general counsel to Krista L. Freitag (the “Receiver”), the Court-appointed receiver  
3 for Defendant Integrated National Resources, Inc., dba Weedgenics, and Relief  
4 Defendants West Coast Development LLC, INR Consulting LLC (Wyoming  
5 Entity), Oceans 19 Inc., Autobahn Performance LLC, One Click General Media  
6 Inc., Opus Collective, INR-CA Investment Holdings, LLC, Total Solution  
7 Construction LLC, Bagpipe Holdings LLC, Bagpipe Multimedia LLC, INR  
8 Consulting LLC (California Entity), and Hidden Springs Holdings Group LLC, and  
9 their subsidiaries and affiliates (collectively the “Receivership Entities”), hereby  
10 submits this Second Interim Application for Payment of Fees and Reimbursement of  
11 Expenses (the “Application”). This Application covers the period from the  
12 Receiver’s appointment on July 1, 2023 through September 30, 2023 (the  
13 “Application Period”), and seeks approval of \$209,526.30 in fees and \$10,353.38 in  
14 expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of  
15 the fees incurred (\$167,621.04) and 100% of the expenses incurred (\$10,353.38).

16 **I. INTRODUCTION.**

17 This equity receivership involves a large, complex, and wide-ranging group  
18 of enterprises and assets associated with the alleged \$61 million fraudulent scheme  
19 that is the subject of the Complaint filed by the Securities and Exchange  
20 Commission (the “Commission”). The Receiver was appointed on a temporary  
21 basis by the Temporary Restraining Order entered on May 19, 2023 (“TRO”), and  
22 on a permanent basis on June 2, 2023, pursuant to the Preliminary Injunction Order  
23 with Respect to Certain Defendants and Relief Defendants and Orders (1) Freezing  
24 Assets; (2) Appointing a Permanent Receiver; (3) Requiring Accountings; and (4)  
25 Prohibiting the Destruction of Documents (Dkt. 33) and subsequent Preliminary  
26 Injunction Orders entered between June 8, 2023 and June 29, 2023 (Dkt. 48, 49, 93  
27 95) (the “Appointment Order”).  
28

1 The Appointment Order confers broad duties, responsibilities, and powers  
 2 upon the Receiver, which are designed to allow her to secure, preserve, and protect  
 3 the assets of the Receivership Entities, conduct a forensic accounting and analysis of  
 4 the Receivership Entities’ financial transactions, investigate and recover sums  
 5 transferred to third parties, review and analyze investor and creditor claims, and  
 6 maximize the amount ultimately available for distribution to investors and creditors.  
 7 The Receiver promptly determined that experienced and qualified counsel was  
 8 critical to the performance of her duties and obligations under the Appointment  
 9 Order due to the size and complexity of the receivership estate. Accordingly, the  
 10 Receiver engaged Allen Matkins to assist with legal issues facing the receivership  
 11 estate and the firm immediately began work, including assisting with the takeover of  
 12 the enterprises and securing their assets. The Court approved the Receiver’s  
 13 engagement of Allen Matkins on July 28, 2023. Dkt. 125.

14 This Application should be read in conjunction with the Receiver’s Second  
 15 Report and Recommendations (“Second Report”) filed on August 23, 2023  
 16 (Dkt. 149), which describes in detail the Receiver’s activities during the Application  
 17 Period.

18 This Application seeks approval of \$209,526.30 in fees for a total of 357.60  
 19 hours worked, and payment on an interim basis of 80% of that amount, or  
 20 \$167,621.04. Allen Matkins has agreed to discount its standard hourly rates by 10%  
 21 for this case. The work performed is described task-by-task in **Exhibit A**<sup>1</sup> and is  
 22 broken down into the following categories:

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<sup>1</sup> While Allen Matkins has made efforts to ensure that its billing entries are consistent across categories, certain activities lend themselves to more than one category, or may be difficult to categorize. In any event, **Exhibit A** reflects the actual time spent by Allen Matkins personnel, and contains accurate descriptions of the services rendered.

<b>Category</b>	<b>Hours</b>	<b>Amount</b>
General Receivership	15.20	\$10,154.70
Asset Investigation & Recovery	303.40	\$175,124.70
Reporting	5.20	\$3,580.20
Operations & Asset Sales	13.00	\$8,950.5
Claims & Distribution	19.10	\$10,545.75
Pending Litigation	0.20	\$137.70
Employment/Fees	1.50	\$1,032.75
<b>Total Fees</b>	<b>\$ 357.60</b>	<b>\$209,526.30</b>

The initial phase of a complex equity receivership always involves substantial work by the receiver and professionals to (a) identify and secure cash, real property, and other assets, (b) preserve their value, (c) investigate and pursue recovery of funds disbursed from the Receivership Entities' accounts, (d) gather and review key documents, and (e) advise the Court on the status of the Receiver's activities, among other areas of work. As this type of receivership progresses, fees and costs generally decline as assets are secured and protected, and procedures for the efficient administration of the receivership are put in place.

The vast majority of legal work done during the Application Period is in the Asset Investigation and Recovery category. This category is discussed further below, but the amount of legal work required resulted from several factors. First and foremost was the almost complete lack of company records. There were no office locations maintained by any of the Receivership Entities (they all used P.O. Box-type addresses). Therefore, the Receiver promptly made detailed requests for information and documents to each of the individual Defendants and Relief Defendants. However, very little was provided (most of which came from Relief Defendant Francom), nor were any computers, hard drives, servers, tablets or smart phones containing data associated with the Receivership Entities turned over by any of the Defendants or Relief Defendants. Certain of the Defendants and Relief

1 Defendants did not respond at all to the Receiver’s requests (Williams and  
2 Delgado), others stated they no longer had company smart phones in their  
3 possession (Hirschmann and Montgomery), and another stated he did not have a  
4 company smart phone and only communicated with people about the Receivership  
5 Entities by telephone, *i.e.* no emails or text messages (Campbell).

6 This meant that, other than cash frozen in accounts that the SEC was aware of  
7 through its investigation, the Receiver had virtually no information about assets or  
8 records of the Receivership Entities and had to move as quickly as possible to gather  
9 such information and documents through numerous subpoenas (more than 135 to  
10 date) issued to third parties, including banks, internet hosting companies, telecom  
11 carriers, insurance companies, escrow companies, contractors, vendors, attorneys,  
12 accountants, and others. The lack of any significant information or documents from  
13 Hirschmann, Williams, Delgado, Montgomery and Campbell substantially expanded  
14 the legal work needed to identify and secure Receivership Entity assets.<sup>2</sup>

15 In addition, in multiple instances, the Receiver learned from third parties that  
16 Defendant Hirschmann had attempted to conceal, take or sell assets belonging to the  
17 Receivership Entities for his personal use. Stopping these violations of the TRO and  
18 Appointment Order and recovering the associated assets from Hirschmann and/or  
19 the third parties involved also substantially increased the legal work necessary to  
20 secure and protect Receivership Entity assets.

21 The Receiver also learned that not only were many company email accounts  
22 deleted after entry of the TRO, but Hirschmann, Montgomery and Williams all  
23 stated that company smart phones they had used had either been destroyed or given  
24 away, making the data on them unrecoverable. This destruction of data also  
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26 <sup>2</sup> Since engaging the Nixon Peabody law firm to represent him, Hirschmann has  
27 provided a limited amount of information and documents to the Receiver,  
28 through counsel and on a piecemeal basis, and has turned over certain  
Receivership Entity assets, albeit after significant discussion, time and effort.



1 substantially expanded the legal work needed to locate, preserve and protect the  
2 remaining electronic records associated with the Receivership Entities' operations.

3 Lastly, the Receiver has been required (per each party's respective counsel) to  
4 make nearly every communication with Defendants and/or Relief Defendants  
5 through counsel, thus increasing the amount of time and cost for such necessary  
6 communications.

7 Allen Matkins has worked diligently and efficiently to assist the Receiver  
8 with legal issues facing the receivership estate. The Firm's work has allowed the  
9 Receiver to preserve and protect the substantial value of receivership estate assets.  
10 Because the firm has worked diligently and efficiently to assist the Receiver in  
11 carrying out her Court-ordered duties, it should be compensated on an interim basis  
12 for its work.

13 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.**

14 **A. Categories and Descriptions of Work.**

15 **1. General Receivership.**

16 Services in this category relate to assisting the Receiver with matters relating  
17 to the general administration of the receivership estate and the underlying litigation.  
18 This work included analyzing and advising the Receiver on relevant developments  
19 in the case, including discussions and stipulations relating to the unfreezing of  
20 certain Relief Defendant assets. Allen Matkins also worked on the Receiver's  
21 motion for order in aid of receivership, which was filed on July 6, 2023 and granted  
22 on July 28, 2023. Dkt. 107, 125. The firm also assisted the Receiver in responding  
23 to a demand from Relief Defendant Eric Francom that Receivership Entity INR-CA  
24 Investment Holdings indemnify and defend him in this litigation (which demand  
25 was declined). Allen Matkins also assisted the Receiver in responding to a  
26 subpoena for records issued by the Department of Justice, as well as inquiries from  
27 the media about the case. Finally, attorney Ted Fates attended the FRCP Rule 26(f)  
28

1 conference of counsel held on September 28, 2023. The reasonable and necessary  
2 fees for Allen Matkins' work in this category total \$10,154.70.

3 **2. Asset Investigation & Recovery.**

4 The substantial services in this category relate generally to efforts to identify,  
5 secure, preserve, investigate and recover Receivership Assets. As can be expected  
6 during the early stage of a receivership involving allegations of a large-scale Ponzi  
7 scheme, investigation-related tasks comprised the largest category of Allen Matkins'  
8 work during the Application Period. The tasks performed include the following:

- 9 • Issuing over \_\_\_ subpoenas during the Application Period to financial  
10 institutions, vendors, website/domain hosting companies, escrow  
11 companies, telecom carriers, recipients of potential receivership assets,  
12 and others involved with or otherwise connected to the Receivership  
13 Entities or their assets in some manner;
- 14 • Issuing demand and asset turnover letters to recipients believed to be in  
15 possession of receivership assets in order to enable the Receiver to  
16 recover and gain control over the Assets;
- 17 • Issuing document preservation letters to recipients believed to be in  
18 possession of the Receivership Entities' books and records;
- 19 • Gathering, organizing, and reviewing documents and information  
20 obtained from third parties including, but not limited to, banking and  
21 other financial records, investment records, asset-related purchase and  
22 sale documents, legal files, and investor communications;
- 23 • Analyzing investor transactions and associated documentation in order  
24 to develop a better understanding of the nature and scope of the  
25 fraudulent scheme;
- 26 • Promptly addressing, communicating with third parties, and assisting  
27 the Receiver with recovery of Receivership Entity funds taken by  
28 Hirschmann for his personal use; and

- Addressing discovery disputes, including assertions of attorney-client privilege and privacy rights in connection with various third-party subpoenas.

As briefly addressed above, Allen Matkins devoted considerable time to identifying, securing and recovering substantial receivership assets formerly under the control of Hirschman due to his failure to disclose or turnover such assets. As noted above, Allen Matkins also spent considerable time working to locate and recover electronic data of the receivership entities and to identify those associated with the destruction and/or loss of receivership entity records and data. The firm also assisted the Receiver in identifying necessary and appropriate subpoena targets, preparing subpoenas, and conferring with recipients regarding any production objections and/or issues including, but not limited to, the allocation of costs associated with preparing a response and producing responsive materials.

Allen Matkins also assisted the Receiver in (a) analyzing claims of privilege asserted by subpoena recipients, (b) recovering receivership entity funds paid to a law firm in violation of the TRO and PI Order, (c)

The reasonable and necessary fees for Allen Matkins' work in this category total \$175,124.70.

### **3. Reporting.**

Allen Matkins' services in this category were focused on preparing the Receiver's Second Report and Recommendations, which was filed on August 23, 2023. Dkt. 149. The reasonable and necessary fees for Allen Matkins' work in this category total \$3,580.20.

### **4. Operations & Assets Sales.**

The reasonable and necessary fees for Allen Matkins' work in this category total \$8,950.50.

1                   **5.     Claims & Distributions.**

2           Services rendered in this category generally relate to the claims and interests  
3 of investors and creditors of the Receivership Entities. Allen Matkins assisted with  
4 issues related to disseminating information about the receivership to investor and  
5 creditors, including notification letters, and information provided on the receivership  
6 website ([www.inreceivership.com](http://www.inreceivership.com)). The firm also assisted in responding to direct  
7 inquiries from investors and creditors. The reasonable and necessary fees for Allen  
8 Matkins' work in this category total \$10,545.75.

9                   **6.     Pending Litigation.**

10          Services performed in this category include the analysis of pending pre-  
11 receivership actions in which one or more of the Receivership Entities are parties.  
12 Specifically, work within this category was largely devoted to a pending arbitration  
13 proceeding against INR with AAA, which has now been stayed pursuant to the TRO  
14 and PI Order. The reasonable and necessary fees for Allen Matkins' work in this  
15 category total \$137.70.

16                  **7.     Employment/Fees.**

17          The reasonable and necessary fees for Allen Matkins' work in this category  
18 total \$1,032.75.

19                  **B.     Summary of Expenses Requested for Reimbursement.**

20          Allen Matkins requests that the Court approve reimbursement of \$10,353.38  
21 in out-of-pocket costs. The itemization of such expenses is summarized below by  
22 billing category. The majority of the expenses incurred relate to the issuance and  
23 service of subpoenas. As explained above, Allen Matkins issued more than 100  
24 subpoenas and gathered documents from many third parties and financial  
25 institutions. Each of these subpoenas required proper service.

26          The total for costs incurred by Allen Matkins during the Application Period is  
27 \$10,353.38 and is broken down by category as follows:

28

Category	Total
Messenger/FedEx Fees	\$338.56
Service of Process	\$405.60
PACER/Document Research	\$5,833.20
Document Production	\$108.60
E-Discovery	\$3,667.42
<b>Total Fees</b>	<b>\$10,353.38</b>

**III. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED.**

“As a general rule, the expenses and fees of a receivership are a charge upon the property administered.” *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and her professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and her professionals are committed to the sound discretion of the Court. *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)).

In allowing fees, a court should consider “the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained.” *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the “economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single factor is

1 determinative and “a reasonable fee is based [upon] all circumstances surrounding  
2 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.  
3 Supp. 465, 480 (S.D. Tex. 1974).

4 As a preliminary matter, the Appointment Order confer on the Receiver  
5 substantial duties and powers, including to conduct such investigation and discovery  
6 as may be necessary to locate and account for all Receivership Assets, to take such  
7 action as is necessary and appropriate to assume control over and preserve  
8 Receivership Assets, and to employ attorneys and others to investigate and, where  
9 appropriate, institute, pursue, and prosecute all claims and causes of action of  
10 whatever kind and nature. *See* Appointment Order, Section X.

11 As previously noted, the Receiver promptly determined that utilizing a few  
12 third-party vendors and her experienced staff at E3 as well as experienced, qualified  
13 counsel was critical due to the lack of records, size and complexity of the  
14 receivership estate. The Receiver sought approval and the Court approved her  
15 engagement of Allen Matkins and the ability to file interim reports and fee  
16 applications on a quarterly basis via the Order Regarding Aid of Receivership.  
17 Dkt. 60, 125.

18 Allen Matkins has submitted a detailed fee application which describes the  
19 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to  
20 staff matters as efficiently as possible while remaining cognizant of the complexity  
21 of issues presented. As noted above, the request for fees is based on Allen Matkins’  
22 customary billing rates charged for comparable services provided in other matters,  
23 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for  
24 15.00 hours of work (\$5,274.00 in fees).

25 The work performed by Allen Matkins was essential to carrying out the  
26 Receiver’s Court-ordered duties. The Receiver and Allen Matkins have worked  
27 diligently since the Receiver’s appointment to preserve and protect the assets of the  
28 receivership estate, maximize the funds available for ultimate distribution to

1 investors, and carry out the Receiver’s other duties pursuant to the Appointment  
2 Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an  
3 interim basis in recognition of the fact that its work in assisting the Receiver is  
4 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion  
5 of the receivership. Allen Matkins’ fees are fair and reasonable and should be  
6 approved and paid on an interim basis.

7 **IV. CONCLUSION.**

8 Allen Matkins therefore respectfully request that this Court enter an Order:

- 9 1. Approving Allen Matkins’ fees of \$209,526.30;
- 10 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
11 \$167,621.04, from the assets of the Receivership Entities;
- 12 3. Approving Allen Matkins’ costs in the amount of \$10,353.38, and  
13 authorizing and directing the Receiver to reimburse such costs in full; and
- 14 4. For such other and further relief as the Court deems appropriate.

15  
16 Dated: March 19, 2024

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

17 By:           /s/Edward G. Fates          

18 EDWARD G. FATES  
19 Attorneys for Court-Appointed  
20 Receiver  
21 KRISTA L. FREITAG  
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# **EXHIBIT A**



11/02/23 15:01:53 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 393983.00002      Client Name: Krista Freitag, as Receiver for Integrat (Ted)  
 Date of Last Billing:      Matter Name: General Receivership  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/05/23	9272672	Review/evaluate the status of the pending stipulation with defendant Hirschman, call with Receiver counsel (.4). Call with Receiver counsel and review of motion related to order in aid of receivership (.4).	Zaro, David	0.80	716.40	716.40	WO	HD	TR	_____
07/05/23	9296312	Draft email to SEC and defendants' counsel regarding motion in aid of receivership	Pham, Matt D.	0.10	48.15	764.55	WO	HD	TR	_____
07/06/23	9296316	Review and analyze stipulation between SEC and defendant Bovee regarding preliminary injunction and asset freeze (0.1); Revise motion in aid of receivership, memorandum, declaration, and proposed order (2.1)	Pham, Matt D.	2.20	1,059.30	1,823.85	WO	HD	TR	_____
07/11/23	9274999	Analyze communications from SEC counsel and A. Montgomery counsel regarding stipulated Preliminary Injunction Order and carve out for asset freeze, draft stipulation and revisions re: same	Fates, Edward (Ted)	0.60	413.10	2,236.95	WO	HD	TR	_____
07/24/23	9287038	Analyze and advise Receiver regarding CVP-USA motion to intervene	Fates, Edward (Ted)	0.60	413.10	2,650.05	WO	HD	TR	_____

11/02/23 15:01:53 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

**Fees for Matter 393983.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
07/28/23	9291456	Analyze Hirschmann statement of non-opposition to order in aid of receivership (.1) advise Receiver re: same (.1) analyze order in aid of receivership and advise Receiver re: same (.2)	Fates, Edward (Ted)	0.40	275.40	2,925.45	WO	HD	TR	_____
07/31/23	9294387	Analyze notice of dismissal from counsel for CVP and advise Receiver re: same	Fates, Edward (Ted)	0.20	137.70	3,063.15	WO	HD	TR	_____
08/02/23	9301073	Communications with SEC counsel regarding withdrawal of counsel for M. Delgado	Fates, Edward (Ted)	0.10	68.85	3,132.00	WO	HD	TR	_____
08/03/23	9325649	Communications with counsel for Delgado regarding motion to withdraw as counsel (.1) analyze Francom unopposed motion to unfreeze CVP accounts (.2)	Fates, Edward (Ted)	0.30	206.55	3,338.55	WO	HD	TR	_____
08/09/23	9306116	Analyze T. Campbell answer to SEC complaint and advise Receiver re: same (.2) analyze order setting scheduling conference (.1)	Fates, Edward (Ted)	0.30	206.55	3,545.10	WO	HD	TR	_____
08/10/23	9307569	Analyze proposed draft stipulation to unfreeze Francom assets from counsel for Francom (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	344.25	3,889.35	WO	HD	TR	_____
08/11/23	9326219	Communications with Receiver and SEC counsel regarding proposed stipulation to unfreeze certain Francom assets (.5) communications with SEC counsel and First State Bank regarding unfreezing of CVP accounts (.3)	Fates, Edward (Ted)	0.80	550.80	4,440.15	WO	HD	TR	_____

11/02/23 15:01:53 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

**Fees for Matter 393983.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
08/15/23	9311128	Analyze stipulation extending deadline for Hirschmann to respond to complaint and advise Receiver re: same (.2) communications with AUSA regarding scheduling of conference call, subpoena to Receiver for records, and related issues (.7)	Fates, Edward (Ted)	0.90	619.65	5,059.80	WO	HD	TR	_____
08/16/23	9312215	Work on letter in response to E. Francom demand for indemnification (1.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	895.05	5,954.85	WO	HD	TR	_____
08/17/23	9313083	Analyze A. Montgomery answer to SEC complaint (.3) analyze order approving unfreezing of certain Francom assets and advise Receiver re: same (.2)	Fates, Edward (Ted)	0.50	344.25	6,299.10	WO	HD	TR	_____
08/17/23	9313350	Communications with AUSA and Receiver regarding scope of subpoena requesting records	Fates, Edward (Ted)	0.50	344.25	6,643.35	WO	HD	TR	_____
08/24/23	9319911	Communications with Receiver regarding subpoena for records received from USAO and document production (.3) communications with USAO re: same (.2)	Fates, Edward (Ted)	0.50	344.25	6,987.60	WO	HD	TR	_____
08/25/23	9321580	Analyze and advise Receiver regarding responses to media inquiries concerning receivership	Fates, Edward (Ted)	0.30	206.55	7,194.15	WO	HD	TR	_____
08/29/23	9324494	Communications with SEC counsel and AUSA regarding meeting with P. Williams and logistics (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	344.25	7,538.40	WO	HD	TR	_____
08/31/23	9328109	Analyze letter from counsel for E. Francom requesting stipulation unfreezing personal	Fates, Edward (Ted)	0.50	344.25	7,882.65	WO	HD	TR	_____

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**Fees for Matter 393983.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		assets (.4) communications with SEC counsel and counsel for P. Williams (.1)								
09/01/23	9334675	Analyze Hirschmann answer to SEC complaint (.4) advise Receiver re: same (.3) communications with SEC counsel and counsel for Francom regarding meet and confer for request to unfreeze personal assets (.4) communications with SEC counsel and counsel for parties regarding stipulation to continue scheduling conference (.2)	Fates, Edward (Ted)	1.30	895.05	8,777.70	WO	HD	TR	_____
09/06/23	9335721	Communications with Receiver, SEC counsel and counsel for Francom regarding Francom request to unfreeze personal assets	Fates, Edward (Ted)	0.60	413.10	9,190.80	WO	HD	TR	_____
09/19/23	9347419	Analyze orders relating to withdrawal by Delgado counsel and self-representation by Delgado (.2) communications with counsel for parties regarding Rule 26(f) issues (.2)	Fates, Edward (Ted)	0.40	275.40	9,466.20	WO	HD	TR	_____
09/22/23	9351106	Communications with counsel for parties regarding Rule 26(f) conference	Fates, Edward (Ted)	0.20	137.70	9,603.90	WO	HD	TR	_____
09/26/23	9354370	Communications with Receiver's conflict counsel regarding notice of association of counsel	Fates, Edward (Ted)	0.20	137.70	9,741.60	WO	HD	TR	_____
09/28/23	9356719	Attend Rule 26(f) conference, communications with counsel for parties re: same	Fates, Edward (Ted)	0.40	275.40	10,017.00	WO	HD	TR	_____
09/29/23	9358395	Communications with SEC counsel and counsel for parties regarding potential	Fates, Edward (Ted)	0.20	137.70	10,154.70	WO	HD	TR	_____

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**Fees for Matter 393983.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		government shutdown and continuance of Rule 26(f) conference						

**Disbursements for Matter 393983.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	_____
07/05/23	2838602	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	2.60	WO	HD	TR	_____
07/05/23	2838603	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	0.10	WO	HD	TR	_____
07/05/23	2838604	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	19.10	WO	HD	TR	_____
07/05/23	2838605	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	1.10	WO	HD	TR	_____
07/05/23	2838606	DCSRCH – Document Search - - PACER - Usage 2ND QTR	0.00	0.20	WO	HD	TR	_____
07/07/23	2830598	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
07/13/23	2830599	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
07/14/23	2830600	RSRCH – WestLaw	0.00	206.40	WO	HD	TR	_____
07/17/23	2830601	RSRCH – WestLaw	0.00	343.20	WO	HD	TR	_____
07/18/23	2830602	RSRCH – WestLaw	0.00	208.40	WO	HD	TR	_____
07/19/23	2830603	RSRCH – WestLaw	0.00	120.00	WO	HD	TR	_____
07/20/23	2829185	MSNGR – Federal Express - Ship To: Attn Lisa Ryan - E3 Advisors	0.00	16.36	WO	HD	TR	_____
08/01/23	2832675	EDISC – CS Disco, Inc. - Monthly Hosting for August 2023	0.00	150.00	WO	HD	TR	_____

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**Disbursements for Matter 393983.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
08/01/23	2832861	EDISC – CS Disco, Inc. - Monthly Hosting for July 2023	0.00	150.00	WO	HD	TR	_____
08/08/23	2832464	MSNGR – Federal Express - Ship To: Attn Lisa Ryan - E3 Advisors	0.00	16.60	WO	HD	TR	_____
08/08/23	2836506	RSRCH – WestLaw	0.00	103.20	WO	HD	TR	_____
08/09/23	2836507	RSRCH – WestLaw	0.00	378.00	WO	HD	TR	_____
08/10/23	2836508	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
08/11/23	2836509	RSRCH – WestLaw	0.00	51.60	WO	HD	TR	_____
08/21/23	2836504	RSRCH – WestLaw	0.00	272.40	WO	HD	TR	_____
08/22/23	2836502	RSRCH – WestLaw	0.00	568.00	WO	HD	TR	_____
08/22/23	2836505	RSRCH – WestLaw	0.00	272.40	WO	HD	TR	_____
08/23/23	2836503	RSRCH – WestLaw	0.00	309.20	WO	HD	TR	_____
08/24/23	2839124	MSNGR – Messenger - Nationwide Legal LLC -Sheppard Mullin	0.00	193.75	WO	HD	TR	_____
08/24/23	2840029	RSRCH – WestLaw	0.00	428.00	WO	HD	TR	_____
08/29/23	2840215	RSRCH – WestLaw	0.00	2,145.60	WO	HD	TR	_____
08/29/23	2840216	RSRCH – WestLaw	0.00	272.00	WO	HD	TR	_____
09/01/23	2840525	EDISC – CS Disco, Inc. - Monthly Hosting for September 2023	0.00	150.00	WO	HD	TR	_____
09/05/23	2839327	MSNGR – Nationwide Legal, LLC - Federal Bureau of Investigation, Deliver Courtesy	0.00	88.75	WO	HD	TR	_____
09/22/23	2844336	POS – Process of Service - Nationwide Legal LLC - FM Orange County, LLC d/b/a Ferrari of Newport Beach Attn:	0.00	405.60	WO	HD	TR	_____

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**Disbursements for Matter 393983.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
		William S. Story (or Authorized Agent/Representative), LETTER DATED SEPTEMBER 22, 2023; PRELIMINARY INJUNCTION ORDER WITH RESPECT TO CERTAIN DEFENDANTS AND RELIEF DEFENDANTS AND ORDERS: (1) FREEZING ASSETS; (2) APPOINTING A PERMANENT RECEIVER; (3) REQUIRING ACCOUNTINGS; AND (4) PROHIBITING THE DESTRUCTION OF DOCUMENTS; SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION TO: FM ORANGE COUNTY, LLC D/B/A FERRARI OF NEWPORT BEACH						
09/30/23	2842642	ADV – Array - Date Coding	0.00	3,217.42	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.80	895.50	716.40
001665	Fates, Edward (Ted)	12.10	688.50	8,330.85
002510	Pham, Matt D.	2.30	481.50	1,107.45
		15.20		\$10,154.70
Subtotal Fees				\$10,154.70
Discount				0.00
Total Fees				10,154.70
Total Disbursements				10,353.38

**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 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

11/02/23 15:01:53 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

**Account Summary – As Of 11/01/23**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	16,985.20	16,902.00	83.20	58,358.93	48,005.55	10,353.38	58,358.93	48,005.55	10,353.38
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
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP Balance</b>	<b>97,433.16</b>	<b>48,005.55</b>	<b>49,427.61</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

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**Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
 E3 Advisors  
 501 West Broadway, Suite 290  
 San Diego, CA 92101

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11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 393983.00003      Client Name: Krista Freitag, as Receiver for Integrat  
 (Ted)  
 Date of Last Billing:      Matter Name: Asset Investigation & Recovery  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/01/23	9296300	Draft email to RARI Nutrition principal regarding inventory stored at warehouse	Pham, Matt D.	0.10	48.15	48.15	WO	HD	TR	_____
07/03/23	9266153	Communications with R. Rosen regarding stipulation to turnover retainer funds	Fates, Edward (Ted)	0.30	206.55	254.70	WO	HD	TR	_____
07/03/23	9272632	Evaluate emails and order related to OSC regarding preliminary injunction concerning the Integrated National Resources/INR, follow-up with counsel (.6). Emails/call related to the preliminary injunction, relief defendants, transfer/stipulation as to funds and turnover issues (1.1).	Zaro, David	1.70	1,522.35	1,777.05	WO	HD	TR	_____
07/03/23	9296308	Phone call with Deanna Rilling regarding subpoena	Pham, Matt D.	0.20	96.30	1,873.35	WO	HD	TR	_____
07/05/23	9272677	Email/call with counsel, advice related to the turnover of documents/subpoenas and follow-up (.3).	Zaro, David	0.30	268.65	2,142.00	WO	HD	TR	_____
07/05/23	9296313	Cursory review of document productions from Cable One, Capital Ed, Dreambuilders, FedEx, and Murchison &	Pham, Matt D.	1.40	674.10	2,816.10	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Cumming and update subpoena spreadsheet accordingly								
07/06/23	9271467	Analyze revised stipulation re return of retainer funds and communications with SEC counsel and counsel for Hirschmann re same	Fates, Edward (Ted)	0.30	206.55	3,022.65	WO	HD	TR	_____
07/06/23	9275216	Evaluate several emails regarding Idaho Credit Union accounts, approach to turnover/freeze (.4). Call with the Receiver related to the Idaho Credit Union, revise email response (.4). Emails with Receiver and counsel for Mr. Hirschman related to the stipulation, follow-up thereon (.2). Email/order concerning the stipulations/preliminary injunction hearing (.4).	Zaro, David	1.40	1,253.70	4,276.35	WO	HD	TR	_____
07/06/23	9296315	Cursory review of document productions from Idaho Central, Achieve Personal Loans, Zelle, Dreambuilders, Wells Fargo (0.9); Email correspondence with TOK Commercial regarding video footage of storage unit (0.3); Draft email to Andrea Costello regarding subpoena (0.2); Phone call with Premier Storage representative regarding video footage (0.1); Draft email to Roberto Amerosi regarding follow-up on document production (0.1)	Pham, Matt D.	1.60	770.40	5,046.75	WO	HD	TR	_____
07/07/23	9277081	Several emails, analysis of Hirschman counsel responses to demands for records/documents and follow-up.	Zaro, David	0.60	537.30	5,584.05	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
07/07/23	9296325	Draft email to BMW of Las Vegas regarding \$2,000 deposit (0.1); Cursory review of document productions from Bank of America and Deanna Rilling (0.6); Phone call with client regarding updates on case and subpoenas (0.3)	Pham, Matt D.	1.00	481.50	6,065.55	WO	HD	TR	_____
07/08/23	9296335	Phone call with client regarding updates on RARI Nutrition, insurance, subpoenas, and other case matters	Pham, Matt D.	1.10	529.65	6,595.20	WO	HD	TR	_____
07/10/23	9278062	Evaluate several emails concerning Hirschmann investigation and counsel's response/link to records, follow-up (.6). Meeting with counsel to address the subpoena issues, claims investigation and strategy as to third parties, advice as to notice (.5).	Zaro, David	1.10	985.05	7,580.25	WO	HD	TR	_____
07/11/23	9296351	Draft email to DocuSign regarding metadata extraction (0.1); Email correspondence with State Farm regarding policies and subpoena (0.2); Email correspondence with Shapiro law firm regarding subpoena (0.2); Virtually attend meeting with State Farm representatives regarding subpoena and insurance policies (0.3); Draft email to client regarding follow up with State Farm (0.2); Cursory review of document productions from Coinbase, Lifestyle Custom, Mystic Holdings, Dickinson Wright (0.8); Draft email to Greenberg Traurig regarding Mike Garcia (0.1); Phone call with client regarding forthcoming meeting with SEC and US Attorney's office (0.1); Draft various follow-up emails to Rari Nutrition, its broker,	Pham, Matt D.	2.70	1,300.05	8,880.30	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Deanna Rilling, and State Farm (0.3); Virtually attend meeting with client, SEC, and US Attorney's office regarding receiver's findings on IP addresses (0.4)								
07/12/23	9278360	Call with Receiver concerning status of turnover demands, address RawSports operations, strategy and risk issues.	Zaro, David	0.40	358.20	9,238.50	WO	HD	TR	_____
07/12/23	9278368	Several emails, call, and review of court filing concerning the preliminary injunction hearing and pending stipulation.	Zaro, David	0.30	268.65	9,507.15	WO	HD	TR	_____
07/12/23	9296363	Phone call with James Shapiro of Smith & Shapiro regarding subpoena (0.2); Phone call with client, SEC, and US Attorney's office regarding information discovered by respective offices (1.0)	Pham, Matt D.	1.20	577.80	10,084.95	WO	HD	TR	_____
07/13/23	9277622	Legal analysis regarding attorney-client privilege	Loza, Marcellino	1.90	504.45	10,589.40	WO	HD	TR	_____
07/13/23	9295094	Perform legal analysis regarding conflicts of law on fraudulent transfer between CA, NV, FL, and IA (2.9).	Robichaud, James	2.90	1,004.85	11,594.25	WO	HD	TR	_____
07/13/23	9296369	Phone call with client regarding PayPal accounts and additional subpoenas	Pham, Matt D.	0.80	385.20	11,979.45	WO	HD	TR	_____
07/14/23	9278744	Legal analysis regarding attorney-client privilege	Loza, Marcellino	1.80	477.90	12,457.35	WO	HD	TR	_____
07/14/23	9279583	Communications with Receiver regarding updates on various investigative and recovery-related tasks	Fates, Edward (Ted)	0.40	275.40	12,732.75	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/17/23	9280031	Follow up communications with counsel for Hirschmann (.4) analyze information relating to notice of HOA violation at Gracemoor property in Las Vegas (.4) analyze information from Receiver re: E. Francom properties (.5) analyze documents provided by investor (.5)	Fates, Edward (Ted)	1.80	1,239.30	13,972.05	WO	HD	TR	_____
07/17/23	9296395	Confer with Ted Fates regarding case updates and outstanding tasks	Pham, Matt D.	1.30	625.95	14,598.00	WO	HD	TR	_____
07/18/23	9281171	Discuss turnover of vehicles by T. Campbell and HOA issue for Gracemoor property in Las Vegas with G. Rodriguez (.7) communications with counsel for Campbell re: same (.3) analyze legal retainer issue relating to Rosen law firm (.3) communications with SEC counsel (.2) analyze issues re: investigation of potential claims against law firms (.6) communications with counsel for Hirschmann regarding email account issues (.4)	Fates, Edward (Ted)	2.50	1,721.25	16,319.25	WO	HD	TR	_____
07/18/23	9282026	Legal analysis regarding attorney-client privilege	Loza, Marcellino	0.90	238.95	16,558.20	WO	HD	TR	_____
07/19/23	9282461	Communications with counsel for Hirschmann regarding turnover of OCGM email account (.8) call with Receiver regarding Francom asset issues (.4) communications with counsel for Campbell regarding turnover of vehicles (.5) discuss same with G. Rodriguez (.4) call with SEC counsel regarding Rosen retainer and Francom asset freeze, Campbell and	Fates, Edward (Ted)	5.20	3,580.20	20,138.40	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Delgado issues (.8) communications with Rosen (.4) communications with counsel for Francom (.5) communications with SEC counsel regarding Qulacan subpoena and document production (.3) communications with counsel for Independent Financial regarding Francom issues (.3) communications with counsel for M. Delgado (.3) communications with conflicts counsel for Receiver regarding questions raised concerning subpoena issued to Google (.3) communications with Receiver re: same (.2)								
07/19/23	9283070	Legal analysis regarding attorney-client privilege in relation to the use of an alias	Loza, Marcellino	1.50	398.25	20,536.65	WO	HD	TR	_____
07/19/23	9283759	Analysis of Hirschman counsel's emails, responses to Receiver/counsel turnover demands, production of records.	Zaro, David	0.40	358.20	20,894.85	WO	HD	TR	_____
07/19/23	9296404	Cursory review of document productions from BMW Financial, Dickinson Wright, Jessica Senekal, JPMorgan Chase Bank, Loretta Cruz, Mystic Holdings, Qualcan, State Farm, Lifestyle Custom	Pham, Matt D.	4.50	2,166.75	23,061.60	WO	HD	TR	_____
07/20/23	9283417	Communications with G. Rodriguez and counsel for Campbell regarding transfer of titles to vehicles, insurance, and delivery of vehicles (.7) communications with Receiver, conflicts counsel, and counsel for Hirschmann regarding Hirschmann objection to Google subpoena and related issues (1.4) communications with counsel for Francom (.3) communications with	Fates, Edward (Ted)	2.70	1,858.95	24,920.55	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation &amp; Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		Receiver and counsel for Hirschmann regarding turnover of company email account (.3)								
07/20/23	9296414	Phone call with Dropbox counsel regarding subpoena	Pham, Matt D.	0.30	144.45	25,065.00	WO	HD	TR	_____
07/21/23	9284878	Analyze accountings filed for Hirschmann and relief defendant entities (.4) discuss same with Receiver (.3) communications with counsel for Hirschmann re: personal property assets reflected on accounting and turnover of same (.4) advise on issues relating to subpoenaed email accounts (.3) communications with SEC counsel and counsel for Delgado regarding carve out issues (.2)	Fates, Edward (Ted)	1.60	1,101.60	26,166.60	WO	HD	TR	_____
07/21/23	9296423	Confer with Ted Fates regarding case updates	Pham, Matt D.	0.20	96.30	26,262.90	WO	HD	TR	_____
07/24/23	9286078	Communications with counsel for Hirschmann and special conflicts counsel regarding objections to Receiver subpoena to Google (.6) analyze documents produced by Qualcan, J. Senekal and L. Cruz and advise on next steps re: same (1.1) discuss same with Receiver (.6) follow up communications with counsel for T. Campbell regarding vehicles (.3) advise on issues regarding sale of Maserati and related subpoenas (.3) analyze Jennings Fulton retainer agreement (.3) conference call and emails with Receiver and counsel for Francom regarding request to unfreeze assets (1.4) analyze information from	Fates, Edward (Ted)	6.40	4,406.40	30,669.30	WO	HD	TR	_____

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		counsel for Hirschmann regarding outstanding requests for information and documents (.9) discuss same with Receiver (.4) analyze issues relating to storage unit, videos, discuss same with Receiver (.5)								
07/24/23	9296429	Cursory review of document productions from Zelle, Credit One, Loretta Cruz, Bank of America, Cox Communications, Veolia Water, Del Amo (3.3); Update subpoena spreadsheet to determine follow ups and next set of subpoenas (1.4)	Pham, Matt D.	4.70	2,263.05	32,932.35	WO	HD	TR	_____
07/24/23	9296433	Confer with Ted Fates regarding case and subpoena updates	Pham, Matt D.	0.50	240.75	33,173.10	WO	HD	TR	_____
07/25/23	9287383	Communications with Receiver regarding Boise storage unit and video footage (.2) call with counsel for Independent Bank regarding defaulted Francom loan (.2) call with Receiver and counsel to discuss outstanding investigative tasks, recovery efforts and subpoenas (1.7) communications with SEC counsel (.2)	Fates, Edward (Ted)	2.30	1,583.55	34,756.65	WO	HD	TR	_____
07/25/23	9292804	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	33.75	34,790.40	WO	HD	TR	_____
07/25/23	9296439	Phone call with Ted Fates and client regarding case updates and outstanding tasks	Pham, Matt D.	1.70	818.55	35,608.95	WO	HD	TR	_____
07/26/23	9288669	Communications with counsel for Hirschmann regarding turn over of personal property and related issues (.6) assist	Fates, Edward (Ted)	4.40	3,029.40	38,638.35	WO	HD	TR	_____



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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

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		regarding bank subpoena and service issues (.4) communications with Receiver and counsel for HOA regarding alleged violation relating to Gracemoor property and related issues (.9) advise on issues relating to Qualcan subpoena (.6) analyze and advise Receiver on issues relating to Gracemoor property, lease for same., L. Cruz, and follow-up communications with counsel for L. Cruz (1.7) communications with SEC counsel re same (.2)								
07/26/23	9292825	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.80	270.00	38,908.35	WO	HD	TR	_____
07/26/23	9296443	Phone call with Premier Storage and TOK Commercial representatives regarding video footage (0.2); Confer with Ted Fates regarding Premier Storage video footage and Qualcan issues (0.2); Phone call with Qualcan's counsel regarding available data (0.2); Review and analyze document productions relating to IP addresses and send relevant information to client (0.4); Email correspondence with Sophia Saleem's counsel regarding document production and turnover (0.4); Draft email to Continental Finance regarding subpoena issues (0.2); Draft email to Loretta Cruz's counsel regarding requests for additional documents and information (0.2); Review and analyze internal memorandum prepared by Marcellino Loza regarding attorney-client privilege issue (0.2)	Pham, Matt D.	2.00	963.00	39,871.35	WO	HD	TR	_____

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07/27/23	9289784	Advise on issues relating to Truist Bank subpoena for records and Verizon subpoena for records (.6) analyze information from counsel for Francom regarding income/expenses and request to unfreeze assets (.6) analyze documents produced by D. Rilling (.5) communications with counsel for T. Campbell regarding vehicles (.6) calls with Receiver and SEC counsel regarding Francom and CVP issues, Delgado, Hirschmann, Campbell and Qualcan issues (1.6)	Fates, Edward (Ted)	3.90	2,685.15	42,556.50	WO	HD	TR	_____
07/27/23	9296451	Phone call with Verizon representative regarding subpoena (0.2); Phone call with Continental Finance representatives regarding subpoena (0.4); Follow up call with Verizon representative regarding subpoena and contents of document production (0.2)	Pham, Matt D.	0.80	385.20	42,941.70	WO	HD	TR	_____
07/28/23	9291090	Analyze issues regarding Hirschmann objection to subpoena for email data (.2) discuss analysis of Francom issues with Receiver (.3) call with Receiver, SEC counsel and Francom counsel regarding issues related to frozen assets (1.6) follow up emails with Receiver and SEC counsel (.4) communications with Receiver and counsel for Hirschmann regarding communications to HOA for Gracemoor property (.4)	Fates, Edward (Ted)	2.90	1,996.65	44,938.35	WO	HD	TR	_____
07/31/23	9294600	Address issues relating to subpoena for records to Truist Bank (.2) communications with counsel SEC and counsel for Francom	Fates, Edward (Ted)	1.30	895.05	45,833.40	WO	HD	TR	_____

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		(.2) advise Receiver on issues relating to Gracemoor property and L. Cruz (.2) advise on subpoena-related issues (.3) analyze document productions relating to Hirschmann and Delgado, communications with Receiver (.4)								
07/31/23	9296485	Phone call with Premier Storage representative regarding transmitting additional video footage (0.1); Email correspondence with client regarding Rari Nutrition inventory, FedEx production, Continental Finance issues, and additional subpoenas (0.2); Draft email to FedEx regarding search parameters for records (0.2)	Pham, Matt D.	0.50	240.75	46,074.15	WO	HD	TR	_____
07/31/23	9297648	Search Murchison document production for evidence of particular loan in response to query by Receiver. (.4).	Robichaud, James	0.40	138.60	46,212.75	WO	HD	TR	_____
08/01/23	9300130	Confer with M. Pham regarding strategy for reviewing and tagging documents produced by Murchison (.4); review documents produced by Murchison (1.2).	Robichaud, James	1.60	554.40	46,767.15	WO	HD	TR	_____
08/01/23	9325645	Communications with Receiver and counsel for Hirschmann regarding HOA issues relating to Gracemoor, Hacienda, and Sultana properties (.8) analyze issues relating to Qualcan subpoena and production (.3) call with Receiver, SEC counsel and Qualcan counsel regarding subpoenas and document productions (.5) call/emails with Receiver and SEC counsel re: issues relating to Francom request to	Fates, Edward (Ted)	4.60	3,167.10	49,934.25	WO	HD	TR	_____

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		unfreeze assets (.6) communications with Receiver, G. Rodriguez and counsel for Campbell regarding Domino loan and vehicles/plates (1.1) advise on issues relating to call with Murchison (.2) communications with counsel for Hirschmann regarding M. Von Kaiser and personal property owned by Oceans 19 (.7) advise Receiver re: same (.4)								
08/01/23	9330614	Confer with Ted Fates regarding Qualcan issues (0.2); Virtually meet with Qualcan's counsel, SEC, and client regarding subpoenas to Qualcan (0.5)	Pham, Matt D.	0.70	337.05	50,271.30	WO	HD	TR	_____
08/02/23	9325648	Communications with Receiver and counsel for Hirschmann regarding M. Von Kaiser, turn over of jewelry, and related issues (.4) communications with Receiver and counsel for Campbell regarding mail issue (.3) communications with counsel for Campbell regarding Domino loan and car loan issues (.4) advise on subpoena for documents to Jennings law firm and attorney-client privilege issues re: same (.7) analyze correspondence from counsel for Francom regarding request to unfreeze funds (.4) analyze HOA notice and communications with Receiver regarding HOA violation issue for Gracemoor (.4)	Fates, Edward (Ted)	2.60	1,790.10	52,061.40	WO	HD	TR	_____
08/02/23	9330620	Email correspondence with Chip Farrell of Murchison & Cumming regarding informal meeting (0.3); Draft email to Bovee's counsel and Adam Fulton regarding proposal for production of privileged	Pham, Matt D.	0.50	240.75	52,302.15	WO	HD	TR	_____

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		documents from Jennings & Fulton (0.2)								
08/03/23	9301628	Communications with SEC counsel regarding Hirschmann and Montgomery deposition transcripts (.3) analyze and advise Receiver on issues relating to HOA for properties, property inspections, personal property/jewelry, M. Von Kaiser, Rari Nutrition (1.6) draft correspondence to counsel for Hirschmann regarding HOA issues, M. Von Kaiser, jewelry/personal property and email/privilege issues (1.6) call with counsel for Campbell regarding vehicle issues and J. Domino loan (.4) discuss issues relating to Hirschmann objection to subpoena for email data with Receiver (.7) communications with counsel for Hirschmann regarding HOA violation, M. Von Kaiser, email issues (.4) analyze accounting filed by T. Campbell and advise Receiver re: same (.2)	Fates, Edward (Ted)	5.20	3,580.20	55,882.35	WO	HD	TR	_____
08/04/23	9325654	Analyze and advise Receiver and G. Rodriguez on Campbell issues and information relating to cell numbers / telecom carriers, subpoenas relating to same (.9) advise Receiver on issues relating to property inspections for Hacienda and Sultana (.4) communications with counsel for Hirschmann regarding turn over of personal property and HOA issues (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.10	1,445.85	57,328.20	WO	HD	TR	_____
08/07/23	9303948	Communications with counsel for Montgomery re: subpoena to Jennings law firm and privilege issues (.6)	Fates, Edward (Ted)	3.10	2,134.35	59,462.55	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		communications with Receiver and SEC counsel relating to unfreezing of certain Francom accounts and stipulation related thereto (.3) analyze and advise Receiver on issues and strategy for call with Murchison law firm (.3) communications with SEC counsel and counsel for Qualcan regarding subpoenaed documents and related issues (.9) discuss same, and Hacienda and Sultana property inspections with Receiver (.4) communications with counsel for Hirschmann re: property inspections and turn over of watches / jewelry (.4) communications with counsel for Master Blends (.2)								
08/07/23	9330642	Confer with Ted Fates regarding case updates and outstanding tasks	Pham, Matt D.	0.20	96.30	59,558.85	WO	HD	TR	_____
08/07/23	9330646	Phone call with Matthew Selhorst of Selhorst Woodworks regarding follow-up to email correspondence (0.4); Virtually meet with Qualcan's counsel, SEC, and client regarding Qualcan's updates on various inquiries from SEC and receiver (0.4); Phone call with Krista Freitag and Ted Fates for preparation of Murchison informal meeting (0.8)	Pham, Matt D.	1.60	770.40	60,329.25	WO	HD	TR	_____
08/08/23	9304978	Communications with Receiver and counsel for Hirschmann regarding watches/jewelry pick-up in Boise and property inspections (1.4) communications with SEC counsel regarding Qualcan subpoena issues (.4) analyze and advise Receiver on issues relating to Delgado vehicles (.3)	Fates, Edward (Ted)	4.10	2,822.85	63,152.10	WO	HD	TR	_____

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		communications with Jennings law firm and counsel for A. Montgomery regarding production and privilege issues (.3) discuss issues for call with Murchison with Receiver (.3) call with Receiver and Murchison regarding legal work done for INR and related issues (1.4)								
08/08/23	9330652	Review and analyze bank document productions relating to Bovee, Delgado, and Campbell (1.7); Email correspondence with Matthew Selhorst regarding Mike Von Kaiser (0.3); Virtually meet with Murchison & Cumming attorneys, Ted Fates, and Krista Freitag regarding firm's representation of INR (1.4); Confer with Ted Fates regarding Murchison-related issues following meeting and next steps (0.3)	Pham, Matt D.	3.70	1,781.55	64,933.65	WO	HD	TR	_____
08/09/23	9306510	Confer with M. Pham regarding legal analysis of suspected fraudulent transferee liability and practical administration of turnovers and related issues (0.4); teleconference with attorney S. McLemore regarding Rory Nutrition and related subpoena and contracts (0.5); follow-up with M. Pham regarding same (0.1).	Del Castillo, Joshua	1.00	688.50	65,622.15	WO	HD	TR	_____
08/09/23	9325662	Communications with Receiver, G. Rodriguez and counsel for Hirschmann regarding Hacienda and Sultana property inspections, HOA issues (.8) discuss analysis of Murchison and Dickinson issues with Receiver (.5) advise on issues regarding outstanding subpoenas and responses (.4) call with counsel for Master	Fates, Edward (Ted)	3.10	2,134.35	67,756.50	WO	HD	TR	_____

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		Blends regarding purchase order for Rari Nutrition (.8) advise Receiver re: same and next steps (.6)								
08/09/23	9330666	Draft email to Brian Irvine of Dickinson Wright regarding request for informal meeting (0.2); Draft email to client regarding explanation of Verizon document production (0.2); Phone call with Sophia Saleem's counsel regarding document production and other issues (0.4)	Pham, Matt D.	0.80	385.20	68,141.70	WO	HD	TR	_____
08/10/23	9307360	Teleconferenece with attorney for INR discovery target and prepare update to counsel regarding same (0.6).	Del Castillo, Joshua	0.60	413.10	68,554.80	WO	HD	TR	_____
08/10/23	9311058	Communications with counsel for Hirschmann regarding property inspection reports for Hacienda and Sultana and related issues (.5) analyze and advise on issues relating to Rari Nutrition and Master Blends (.4) discuss issues relating to Delgado and Campbell vehicles and Hirschmann jewelry purchases with Receiver (.3) communications with Jennings firm and counsel for Montgomery re: document production issues (.2) advise on outstanding subpoena issues (.3) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.10	1,445.85	70,000.65	WO	HD	TR	_____
08/10/23	9330673	Draft email to Rari Nutrition principals regarding Master Blendz contact (0.2); Confer with Ted Fates regarding subpoena updates (0.3)	Pham, Matt D.	0.50	240.75	70,241.40	WO	HD	TR	_____



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08/11/23	9308542	Review of Murchison production for likely omitted documents (.2); confer with M. Pham regarding known times at which tours of QualCan occurred (.2).	Robichaud, James	0.40	138.60	70,380.00	WO	HD	TR	_____
08/11/23	9311060	Analyze communications and records received from counsel for Qualcan (.9) call with counsel for Hirschmann regarding information and documents requested (.8) discuss Qualcan and Hirshmann issues with Receiver (.5) communications with counsel for Francom regarding Qualcan photos (.3) communications with Receiver and SEC counsel regarding notice from Chase and potential undisclosed Autobahn account at Chase (.6)	Fates, Edward (Ted)	3.10	2,134.35	72,514.35	WO	HD	TR	_____
08/11/23	9315716	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	168.75	72,683.10	WO	HD	TR	_____
08/11/23	9330686	Phone call with Rari Nutrition principal regarding Master Blendz and alternative manufacturer of supplements (0.1); Review and analyze documents from Murchison & Cumming flagged by James Robichaud (1.0); Review and analyze Qualcan's document production and cross-reference with documents from Murchison production (0.6)	Pham, Matt D.	1.70	818.55	73,501.65	WO	HD	TR	_____
08/14/23	9309589	Analyze communications from Chase bank regarding company accounts and notice re: same (.2) communications with counsel for Hirschmann regarding documents related to statues (.3) communications with counsel	Fates, Edward (Ted)	1.00	688.50	74,190.15	WO	HD	TR	_____

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		for Francom regarding production of photographs (.3) review same (.2)								
08/15/23	9311410	Discuss data on investor tours and Qualcan key card / FOB data, outstanding and new subpoenas with Receiver (.9) communications with G. Rodriguez and counsel for Hirschmann regarding Hacienda and Sultana inspections (.5)	Fates, Edward (Ted)	1.40	963.90	75,154.05	WO	HD	TR	_____
08/15/23	9330711	Phone call with Wells Fargo representative regarding supplemental production (0.2); Phone call with JPMorgan Chase representative regarding address change request on Autobahn account (0.2); Draft email to Wells Fargo formally requesting additional documents (0.2); Draft email to Truist Bank representative regarding subpoena (0.1); Phone call with Bank of America representative regarding supplemental production (0.3); Begin preparing new round of document subpoenas (1.5); Draft emails to American Express and Capital One regarding lack of response to subpoenas (0.2)	Pham, Matt D.	2.70	1,300.05	76,454.10	WO	HD	TR	_____
08/15/23	9330719	Phone call with Krista Freitag and Ted Fates regarding case updates and outstanding tasks	Pham, Matt D.	0.50	240.75	76,694.85	WO	HD	TR	_____
08/16/23	9312475	Confer with M. Pham regarding tags to be used in Murchison doc review and add same to Disco (.1).	Robichaud, James	0.10	34.65	76,729.50	WO	HD	TR	_____
08/16/23	9312750	Review documents produced by Murchison & Cumming (1.8).	Robichaud, James	1.80	623.70	77,353.20	WO	HD	TR	_____

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08/16/23	9313730	Call/emails with Receiver to discuss status and updates on investigative tasks, subpoenas, and document productions (1.4) communications with Receiver, G. Rodriguez, and counsel for Hirschmann regarding property inspections and pick up of company jewelry and watches (.7) revisions to communications with Murchison regarding deficient document production (.4) analyze issues and discuss investigation into Gracemoor and M. Von Kaiser issues with Receiver (.6)	Fates, Edward (Ted)	3.10	2,134.35	79,487.55	WO	HD	TR	_____
08/16/23	9315843	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	101.25	79,588.80	WO	HD	TR	_____
08/16/23	9330725	Phone call with Krista Freitag and Ted Fates for continued discussion regarding outstanding tasks	Pham, Matt D.	0.50	240.75	79,829.55	WO	HD	TR	_____
08/16/23	9330727	Draft email to Chip Farrell of Murchison & Cumming regarding meet and confer relating to production (0.7); Review and analyze client's annotated spreadsheets relating to PayPal and Zelle transactions and continue preparing subpoenas relating to payees of such transactions (3.4); Continue drafting latest rounds of subpoenas - various individuals (1.2); Draft email to client regarding communications with Selhorst and KHRR (0.2)	Pham, Matt D.	5.50	2,648.25	82,477.80	WO	HD	TR	_____
08/17/23	9313497	Continue review of documents produced by Murchison & Cumming (3.0).	Robichaud, James	3.00	1,039.50	83,517.30	WO	HD	TR	_____

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08/17/23	9313506	Discuss issues relating to email data and Hirschmann privilege claims with Receiver and special conflicts counsel (.7) communications with Receiver and SEC regarding Delgado accounts (.2) discuss issues regarding pick up and transportation of watches and jewelry with Receiver (.2)	Fates, Edward (Ted)	1.10	757.35	84,274.65	WO	HD	TR	_____
08/17/23	9330737	Phone call with US Bank's counsel regarding subpoena (0.1); Continue preparing latest round of subpoenas - additional financial institutions, various companies that transacted with receivership entities (1.0); Phone call with client regarding Mike Von Kaiser, Mike Garcia, and other issues (0.4); Draft email to Qualcan's counsel regarding missing keycard logs (0.2)	Pham, Matt D.	1.70	818.55	85,093.20	WO	HD	TR	_____
08/18/23	9314096	Communications with counsel for Montgomery regarding review of documents from Jennings firm for privilege purposes (.2) discuss issues regarding M. Von Kaiser phone number with Receiver (.4) analyze and discuss information from Receiver regarding Delgado vehicle and jewelry purchases, strategy and next steps re: same (1.3) communications with SEC counsel re: Delgado issues (.2) revisions to draft engagement agreement with discovery vendor for review of Hirschmann email account (1.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	3.40	2,340.90	87,434.10	WO	HD	TR	_____

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08/21/23	9317384	Legal analysis regarding subpoena recipient's objection to form and substance of subpoena, primarily relating to GLBA (.6); continue Murchison document review (1.1); legal analysis regarding sufficiency of privilege log provided by counsel for individual relief defendant (1.1).	Robichaud, James	2.80	970.20	88,404.30	WO	HD	TR	_____
08/21/23	9327411	Advise on investigative steps relating to Gracemoor property and L. Cruz (.2) communications with counsel for A. Montgomery regarding emails from Jennings law firm and privilege log (.8) analyze privilege log issues raised (.4) communications with Receiver and SEC counsel re: same and Delgado issues (.5) communications with counsel for Hirschmann regarding subpoena for records relating to domains (.4) analyze domain information provided (.3) discuss same and Google email data issues with Receiver (.6)	Fates, Edward (Ted)	3.20	2,203.20	90,607.50	WO	HD	TR	_____
08/21/23	9330770	Review and analyze documents from Murchison & Cumming' production	Pham, Matt D.	0.50	240.75	90,848.25	WO	HD	TR	_____
08/22/23	9318150	Continue research regarding applicability of GLBA protections to subpoena propounded upon financial institution (1.3); begin outlining letter regarding same (.3); continue Murchison document review (1.2); complete research regarding sufficiency of privilege log (.3); draft privilege log memo and transmit to T. Fates (.2).	Robichaud, James	3.30	1,143.45	91,991.70	WO	HD	TR	_____

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08/22/23	9327414	Analyze privilege log issues (.4) communications with counsel for Montgomery and Jennings firm regarding Montgomery privilege claim and related privilege log (1.2) communications with counsel for Hirschmann regarding documents requested and eNom domain issues (.4) call/emails with Receiver and G. Rodriguez re: same (1.1) analyze correspondence and documents from counsel for L. Cruz (.6) discuss same with Receiver (.3) communications with counsel for L. Cruz (.3) call with Receiver and SEC counsel regarding Delgado issues and Williams issues (1.1) communications with counsel for Hirschmann regarding Hacienda inspection (.2)	Fates, Edward (Ted)	5.50	3,786.75	95,778.45	WO	HD	TR	_____
08/22/23	9330780	Review and analyze document production from Loretta Cruz (0.4); Phone call with Intuit's counsel regarding update on searches and production (0.3); Phone call with Krista Freitag, Geno Rodriguez, and Ted Fates regarding eNom domain control issues (1.0); Draft email to Sophia Saleem's counsel regarding document production (0.3)	Pham, Matt D.	2.00	963.00	96,741.45	WO	HD	TR	_____
08/23/23	9318832	Communications with counsel for L. Cruz (.4) communications with Receiver and counsel for Hirschmann regarding M. Von Kaiser issues (.4) communications with counsel for A. Montgomery and Jennings firm regarding privilege log issue (.4) communications with counsel for Hirschmann regarding eNom domain issue	Fates, Edward (Ted)	2.90	1,996.65	98,738.10	WO	HD	TR	_____

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		(.7) discuss same with Receiver and G. Rodriguez (.6) advise on issues regarding call with Dickinson & Wright law firm (.2) discuss issues relating to Campbell vehicles with Receiver (.2)								
08/23/23	9319371	Draft meet and confer letter to Continental regarding compliance with subpoena, Privacy Act, and GLBA (2.1); complete Murchison document review (1.9).	Robichaud, James	4.00	1,386.00	100,124.10	WO	HD	TR	_____
08/24/23	9319912	Communications with counsel for L. Cruz (.2) advise on strategy and next steps for subpoenas and document productions from KHRR and Dickinson law firm (.4) discuss same with Receiver (.2) call with Murchison firm regarding supplemental document production (.3) call with Receiver, SEC counsel, and AUSA regarding anticipated P. Williams proffer meeting (.9) advise Receiver on email preservation issues (.3)	Fates, Edward (Ted)	2.30	1,583.55	101,707.65	WO	HD	TR	_____
08/24/23	9320014	Revisions to draft meet and confer letter to Continental Finance (.5); review documents produced by Dickinson Wright (1.8); draft brief preliminary analysis on contents of Dickinson production to send to M. Pham along with select documents (1.4); prepare summary of total time worked by Murchison attorneys on INR matter (.3).	Robichaud, James	4.00	1,386.00	103,093.65	WO	HD	TR	_____
08/24/23	9320426	Confer extensively with M. Pham and J. Robichaud regarding document production and review issues (0.5).	Del Castillo, Joshua	0.50	344.25	103,437.90	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
08/24/23	9330804	Phone call with KHRR owner regarding work performed on Gracemoor property (0.3); Confer with Ted Fates regarding issues relating to KHRR, Murchison & Cumming, Dickinson Wright (0.3); Phone call with Ted Fates and Chip Farrell of Murchison and Cummings regarding supplemental production (0.2)	Pham, Matt D.	0.80	385.20	103,823.10	WO	HD	TR	_____
08/25/23	9320938	Discuss issues relating to email data preservation, investigative tasks, Murchison document production, and L. Cruz with Receiver (.7) further communications with counsel for L. Cruz (.2) call with Receiver, SEC counsel, and criminal defense counsel for M. Delgado (.4)	Fates, Edward (Ted)	1.30	895.05	104,718.15	WO	HD	TR	_____
08/25/23	9321407	Review correspondence from attorney A. Malo regarding document production and teleconference with M. Pham regarding same (0.3).	Del Castillo, Joshua	0.30	206.55	104,924.70	WO	HD	TR	_____
08/25/23	9330859	Perform preliminary review of documents produced by Sophia Saleem	Pham, Matt D.	0.60	288.90	105,213.60	WO	HD	TR	_____
08/28/23	9323454	Prepare for and attend conference call with K. Freitag, M. Pham, and T. Fates, prior to initial conference with attorneys for Dickinson Wright (.8).	Robichaud, James	0.80	277.20	105,490.80	WO	HD	TR	_____
08/28/23	9323538	Discuss strategy for call with Dickinson with Receiver (.5) call with Receiver and Dickinson attorneys regarding legal work for INR (.9) analyze information from counsel for Hirschmann regarding statues (.4)	Fates, Edward (Ted)	1.80	1,239.30	106,730.10	WO	HD	TR	_____



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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/28/23	9323585	Confer with M. Pham and J. Robichaud regarding document review matters (0.3).	Del Castillo, Joshua	0.30	206.55	106,936.65	WO	HD	TR	_____
08/28/23	9323686	Initial research and analysis regarding Peterson's claims in 9th Circuit Kim Funding appeal (2.1).	Robichaud, James	2.10	727.65	107,664.30	WO	HD	TR	_____
08/28/23	9330888	Review and analyze flagged documents produced by Dickinson Wright (0.6); Continue preparing subpoenas - miscellaneous entities (2.2); Virtually attend meeting with Krista Freitag, Ted Fates and Dickinson Wright attorneys regarding firm's representation of INR (0.8); Phone call with client regarding IP address issues and subpoena update (0.4)	Pham, Matt D.	4.00	1,926.00	109,590.30	WO	HD	TR	_____
08/29/23	9324480	Advise on outstanding subpoenas, document productions and review of same (.4) discuss S. Saleem document production issues with Receiver (.2) analyze information on T. Campbell vehicles and discuss next steps re: same with Receiver (.4) communications with counsel for L. Cruz (.1) attend meeting with P. Williams, AUSA and SEC counsel (1.9) discuss same with Receiver (.4)	Fates, Edward (Ted)	3.40	2,340.90	111,931.20	WO	HD	TR	_____
08/29/23	9328151	Research and forward results of address searches for multiple witness subpoenas.	Kaup, John	1.50	506.25	112,437.45	WO	HD	TR	_____
08/29/23	9330907	Confer with Ted Fates regarding case updates and subpoena updates	Pham, Matt D.	0.10	48.15	112,485.60	WO	HD	TR	_____
08/29/23	9330910	Draft email to Capital One regarding subpoena	Pham, Matt D.	0.20	96.30	112,581.90	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/30/23	9325937	Advise on issues re: Qualcan document production and follow up re: same (.2) advise Receiver on issues re: L. Cruz, M. Von Kaiser and Gracemoor property (.3) call with Receiver and Dickinson attorneys regarding work done for INR (1.1)	Fates, Edward (Ted)	1.60	1,101.60	113,683.50	WO	HD	TR	_____
08/30/23	9330922	Confer with Ted Fates regarding Patrick Williams proffer (0.2); Virtually attend follow-up meeting with Krista Freitag, Ted Fates and Dickinson Wright attorneys regarding firm's representation of INR (1.0)	Pham, Matt D.	1.20	577.80	114,261.30	WO	HD	TR	_____
08/31/23	9330948	Update template for letter accompanying subpoena (0.2); Draft email to Intuit's counsel regarding its request for additional information (0.2); Continue preparing latest round of subpoenas - miscellaneous entities (0.8)	Pham, Matt D.	1.20	577.80	114,839.10	WO	HD	TR	_____
08/31/23	9331034	Discuss issues relating to Autobahn custom-made statues and transportation/storage of same with Receiver (.2) advise on next steps re: Murchison and Dickinson document productions and analysis (.3) communications with counsel for L. Cruz (.1) advise Receiver on issues relating to M. Von Kaiser (.3) communications with counsel for Hirschmann re: same (.2)	Fates, Edward (Ted)	1.10	757.35	115,596.45	WO	HD	TR	_____
09/01/23	9334148	Communications with counsel for Williams and SEC counsel regarding questions for Williams and meeting to discuss same (.2) advise on issues re: Murchison	Fates, Edward (Ted)	2.30	1,583.55	117,180.00	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		supplemental doc production (.3) analyze information from Receiver re: Campbell vehicles (.4) communications with counsel for Campbell re: same (.3) analyze issues relating to gmail data, recovery of same, and issues with counsel for Hirschmann (1.1)								
09/01/23	9335929	Conference with Receiver counsel related to witness Patrick Williams and other interviews, Receiver's accounting.	Zaro, David	0.40	358.20	117,538.20	WO	HD	TR	_____
09/01/23	9340600	IDENTIFY RELEVANT DOCUMENTS TO BE PRODUCED TO FBI; PREPARE DRAFT PRODUCTION OF SAME	Neglia, Ross	2.60	877.50	118,415.70	WO	HD	TR	_____
09/01/23	9361680	Review and analyze text messages produced by Murchison & Cumming	Pham, Matt D.	0.20	96.30	118,512.00	WO	HD	TR	_____
09/05/23	9335087	Analyze issues relating to dispute concerning recovery of gmail data (.4) discuss same with Receiver (.4) communications with Receiver, SEC counsel and counsel for P. Williams (.3)	Fates, Edward (Ted)	1.10	757.35	119,269.35	WO	HD	TR	_____
09/05/23	9340624	FINALIZE REVIEW AND PRODUCTION OF RELEVANT DOCUMENTS TO FBI	Neglia, Ross	2.90	978.75	120,248.10	WO	HD	TR	_____
09/05/23	9361682	[LA JOLLA BRIDGE] Continue drafting Freitag declaration - discussion regarding targeted analysis (2.2), discussion regarding tracing (0.9)	Pham, Matt D.	3.10	1,492.65	121,740.75	WO	HD	TR	_____
09/06/23	9335896	Discuss gmail data recovery and preservation issues, dispute re: same with counsel for Hirschmann with Receiver (.7)	Fates, Edward (Ted)	1.70	1,170.45	122,911.20	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		advise Receiver re: mail addressed to Autobahn / Von Kaiser (.2) communications with counsel for T. Campbell re: vehicles (.2) communications with Receiver and counsel for Hirschmann re: Von Kaiser (.3) advise Receiver re: Gracemoor issues (.2) communications with counsel for L. Cruz (.1)								
09/06/23	9336786	Initial review of second Murchison document production to evaluate approach to further review (.6); begin such document review (.8).	Robichaud, James	1.40	485.10	123,396.30	WO	HD	TR	_____
09/06/23	9345195	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	168.75	123,565.05	WO	HD	TR	_____
09/07/23	9336636	Analyze news article about INR / Weedgenics, Hirschmann, Williams, Qualcan and related issues (.3) call/emails with Receiver and SEC counsel to discuss investigative and accounting issues relating to Francom and INR-CA (.9) discuss Hirschmann issues regarding gmail data with Receiver (.3) communications with counsel for T. Campbell re: vehicles (.2) analyze insurance issues raised by counsel for Hirschmann (.3) discuss same with Receiver (.1)	Fates, Edward (Ted)	2.10	1,445.85	125,010.90	WO	HD	TR	_____
09/07/23	9339426	Continue review of Murchison document production (2.1).	Robichaud, James	2.10	727.65	125,738.55	WO	HD	TR	_____
09/07/23	9347446	IDENTIFY RELEVANT DOCUMENTS FOR ATTORNEY REVIEW	Neglia, Ross	1.40	472.50	126,211.05	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/08/23	9337901	Communications with Receiver re: Francom accounting and investigation issues (.4) conference call with SEC counsel and Francom counsel re: same (.7) call with counsel for L. Cruz regarding Gracemoor, Von Kaiser and transfers received (.6)	Fates, Edward (Ted)	1.60	1,101.60	127,312.65	WO	HD	TR	_____
09/08/23	9347464	IDENTIFY RELEVANT SCANNED DOCUMENTS FOR ATTORNEY REVIEW	Neglia, Ross	0.50	168.75	127,481.40	WO	HD	TR	_____
09/08/23	9361735	Phone calls with Ted Fates and then with Ted Fates and Leo Flangas regarding proposed informal meeting with Loretta Cruz	Pham, Matt D.	0.40	192.60	127,674.00	WO	HD	TR	_____
09/11/23	9339053	Communications with counsel for Hirschmann regarding turnover of Hacienda and Sultana properties and two BWM vehicles and potential motion by Hirschmann to extend deadline (.8) communications with Receiver and SEC counsel re: same (.6) prepare outline of topics for call with Von Kaiser (.4)	Fates, Edward (Ted)	1.80	1,239.30	128,913.30	WO	HD	TR	_____
09/12/23	9340082	Communications with counsel for Francom regarding production of additional documents (.4) analyze communications from P. Williams and counsel for Hirschmann relating to requested extension of deadline for turnover of properties/cars (.7) discuss same with Receiver and SEC counsel (1.1) communications with counsel for Qualcan re: information relating to tours at cannabis facility in Las Vegas (.5) work on arguments relating to turnover of	Fates, Edward (Ted)	7.10	4,888.35	133,801.65	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Hacienda/Sultana properties and two BMW cars (2.2) discuss same with Receiver (1.1) meet and confer call with counsel for Hirschmann and counsel for SEC regarding Hirschmann ex parte application to extend turnover deadline for 2 properties and 2 cars (.6) discuss Von Kaiser issues with Receiver (.4) attempts to reach Von Kaiser with Receiver (.2) communications with counsel for Hirschmann re: same (.2)								
09/13/23	9341196	Initial review of additional documents produced by counsel for Francom (.4) discuss content and strategy for opposition to Hirschmann anticipated ex parte application with Receiver (.9) work on same (.8) communications with SEC counsel regarding Williams' statement and related issues (.4) advise on issues relating to outstanding and additional subpoenas (.3) analyze SEC correspondence relating to Hirschmann anticipated ex parte application (.2) discuss insurance issues with Receiver (.4) respond to email from counsel for Hirschmann re: same (.4) communications with counsel for Campbell regarding vehicles (.3) discuss requests for information from vendor relating to Gracemoor property with G. Rodriguez (.3)	Fates, Edward (Ted)	4.40	3,029.40	136,831.05	WO	HD	TR	_____
09/13/23	9361760	Cursory review of new document productions from Murchison & Cumming, Dickinson Wright, and KHRR and draft follow-up emails to various subpoenaed parties	Pham, Matt D.	1.40	674.10	137,505.15	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
09/14/23	9342432	Communications with vendor for screens for Gracemoor property regarding order, lien on property and related issues (.6) communications with counsel for Hirschmann regarding anticipated ex parte application to extend deadline to turnover 2 properties and 2 cars (.5) review and analyze ex parte application and supporting declaration (.8) work on opposition to same (4.3) discuss issues relating to Campbell vehicles with Receiver (.3) follow up communications with counsel for L. Cruz (.2) communications with Receiver and counsel for Hirschmann regarding insurance issues and transfers to TrVst3d (.8) communications with Receiver regarding gmail data issues (.6) communications with SEC counsel and counsel for Francom regarding document production (.3) discuss issues relating to Hirschmann ex parte application with SEC counsel (.2)	Fates, Edward (Ted)	8.60	5,921.10	143,426.25	WO	HD	TR	_____
09/14/23	9361776	Phone call with Wells Fargo's representative regarding IP logs and subpoena and draft email to client regarding same	Pham, Matt D.	0.20	96.30	143,522.55	WO	HD	TR	_____
09/15/23	9344089	Work on opposition to Hirschmann ex parte application and declarations supporting same (6.4) communications with counsel for Francom regarding facts relating to Williams email (.5)	Fates, Edward (Ted)	6.90	4,750.65	148,273.20	WO	HD	TR	_____
09/15/23	9361793	Confer with Ted Fates regarding Murchison & Cumming's production	Pham, Matt D.	0.20	96.30	148,369.50	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/16/23	9344945	Communications with Receiver and SEC counsel regarding facts related Hirschmann ex parte application (.3) analyze Receiver comments to draft opposition brief (.4)	Fates, Edward (Ted)	0.70	481.95	148,851.45	WO	HD	TR	_____
09/18/23	9345876	Work on revisions to opposition to Hirschmann ex parte application regarding receivership properties and cars (2.9) discuss same with Receiver (1.4) work on revisions to supporting declarations re: same (2.5) meet and confer with SEC counsel regarding issues relating to opposition (.6) communications with counsel for Francom (.2)	Fates, Edward (Ted)	7.60	5,232.60	154,084.05	WO	HD	TR	_____
09/19/23	9347193	Communications with counsel for Francom re: additional documents produced (.2) communications with counsel for Qualcan regarding tours of Las Vegas facility (.4) discuss same with Receiver (.2) advise on issues relating to subpoenas, document productions, and analysis of records (.4) discuss same with Receiver (.3) discuss renewal of web domains with Receiver (.3)	Fates, Edward (Ted)	1.80	1,239.30	155,323.35	WO	HD	TR	_____
09/19/23	9361808	Continue preparing subpoenas to telecom companies, miscellaneous entities	Pham, Matt D.	2.60	1,251.90	156,575.25	WO	HD	TR	_____
09/20/23	9348678	Call with counsel for Qualcan regarding information and documents relating to tours, potential depositions regarding same (.5) call/emails with Receiver to discuss subpoenas, productions, follow up, other investigative tasks (1.4) follow up communications with counsel for investor	Fates, Edward (Ted)	2.60	1,790.10	158,365.35	WO	HD	TR	_____



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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		group (.4) communications with counsel for L. Cruz regarding Zoom video conference (.3)								
09/20/23	9361811	Continue preparing subpoenas to telecom companies, miscellaneous entities	Pham, Matt D.	2.60	1,251.90	159,617.25	WO	HD	TR	_____
09/20/23	9361814	Phone call with Ted Fates and client regarding case updates and outstanding tasks	Pham, Matt D.	1.20	577.80	160,195.05	WO	HD	TR	_____
09/22/23	9351497	Discuss notice of HOA violation for tenant L. Cruz at Las Vegas property with Receiver (.3) communications with counsel for L. Cruz re: same (.3) communications with counsel for Francom regarding further documents produced (.2) communications with counsel for Qualcan (.1) advise Receiver re: same (.1)	Fates, Edward (Ted)	1.00	688.50	160,883.55	WO	HD	TR	_____
09/22/23	9361850	Review and analyze recent document productions (1.4); Continue preparing subpoenas to financial institutions, miscellaneous entities (3.2)	Pham, Matt D.	4.60	2,214.90	163,098.45	WO	HD	TR	_____
09/25/23	9353426	Analyze order denying Hirschmann ex parte application, advise Receiver re: same (.4) communications with counsel for Hirschmann and SEC counsel re: same (.2)	Fates, Edward (Ted)	0.60	413.10	163,511.55	WO	HD	TR	_____
09/25/23	9353897	Additional document review of the Murchison production (3.1).	Robichaud, James	3.10	1,074.15	164,585.70	WO	HD	TR	_____
09/26/23	9354879	Complete review of Murchison production (2.5); draft notes and analysis to transmit to M. Pham (.4).	Robichaud, James	2.90	1,004.85	165,590.55	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/26/23	9355941	Communications with Receiver and counsel for L. Cruz (.4) call with SEC counsel and counsel for Hirschmann regarding logistics for turnover of two cars and two properties in Boise (.5) discuss same with Receiver (.3) communications with Receiver and counsel for Hirschmann regarding invoice for HOA fine relating to Gracemoor property in Las Vegas (.4)	Fates, Edward (Ted)	1.60	1,101.60	166,692.15	WO	HD	TR	_____
09/27/23	9355704	Review emails and related documents produced by attorney for investor group (.8) communications with attorney (.4) discuss same with Receiver (.2) analyze communications from counsel for Hirschmann regarding turnover of properties and cars (.4) discuss same with Receiver (.4) prepare response to same (.4) address issues relating to email address for M. Delgado (.2) prepare communications to counsel for Hirschmann regarding information on gifts made using investor funds (.5) prepare outline for Zoom interview of L. Cruz, discuss same with Receiver (.7) communications with counsel for Francom regarding tax accountants for INR-CA (.2) analyze information on tours of Qualcan facility from counsel for Qualcan (.2)	Fates, Edward (Ted)	4.40	3,029.40	169,721.55	WO	HD	TR	_____
09/28/23	9356722	Communications with Receiver and counsel for Hirschmann regarding turnover of BMW cars (.7) attend interview of L. Cruz (3.3) discuss same with Receiver (.4) discuss issues relating to INR-CA investors and	Fates, Edward (Ted)	4.60	3,167.10	172,888.65	WO	HD	TR	_____

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**Fees for Matter 393983.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		accounting with Receiver (.2)						
09/28/23	9361883	Virtually participate in Zoom meeting with Loretta Cruz and her counsel, Ted Fates, and Krista Freitag	Pham, Matt D.	3.30	1,588.95	174,477.60	WO	HD TR
09/29/23	9358165	Discuss issues relating to timing and logistics for turnover of Hacienda and Sultana houses and BMW cars, as well as other requests for information with counsel for Hirschmann (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.80	550.80	175,028.40	WO	HD TR
09/29/23	9361907	Confer with Ted Fates regarding recap of Loretta Cruz meeting and approach for subsequent meeting	Pham, Matt D.	0.20	96.30	175,124.70	WO	HD TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	6.60	895.50	5,910.30
000820	Kaup, John	1.50	337.50	506.25
001665	Fates, Edward (Ted)	162.40	688.50	111,812.40
001842	Del Castillo, Joshua	2.70	688.50	1,858.95
002307	Peng, Simona	2.20	337.50	742.50
002448	Neglia, Ross	7.40	337.50	2,497.50
002510	Pham, Matt D.	77.80	481.50	37,460.70
002592	Robichaud, James	36.70	346.50	12,716.55
002609	Loza, Marcellino	6.10	265.50	1,619.55
		<u>303.40</u>		<u>\$175,124.70</u>
Subtotal Fees				\$175,124.70
Discount				0.00
Total Fees				175,124.70
Total Disbursements				0.00

11/02/23 15:01:54 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Attorney Billing Instructions**

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

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**Billing Instructions**

Expires 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 11/01/23**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	187,384.95	187,384.95	0.00	364,947.30	364,947.30	0.00	364,947.30	364,947.30	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
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>364,947.30</b>	<b>364,947.30</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
 E3 Advisors  
 501 West Broadway, Suite 290  
 San Diego, CA 92101

11/02/23 15:01:57 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 393983.00004      Client Name: Krista Freitag, as Receiver for Integrat  
 Date of Last Billing:      Matter Name: Reporting  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00004.(Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/07/23	9325658	Work on Receiver's second interim report	Fates, Edward (Ted)	2.30	1,583.55	1,583.55	WO	HD	TR	_____
08/17/23	9313503	Discuss revisions/updates to second interim report with Receiver	Fates, Edward (Ted)	0.30	206.55	1,790.10	WO	HD	TR	_____
08/21/23	9316144	Work on revisions to second interim report (1.3) discuss same with Receiver (.4) meet and confer communications with SEC counsel re: same (.2)	Fates, Edward (Ted)	1.90	1,308.15	3,098.25	WO	HD	TR	_____
08/23/23	9318844	Discuss final revisions to 2nd interim report with Receiver (.4) work on same (.3)	Fates, Edward (Ted)	0.70	481.95	3,580.20	WO	HD	TR	_____
09/20/23	9348677	Finalize and file Receiver's 16th interim report (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	413.10	3,993.30	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.80	688.50	3,993.30
		5.80		\$3,993.30

11/02/23 15:01:57 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
	Subtotal Fees			\$3,993.30
	Discount			0.00
	Total Fees			3,993.30
	Total Disbursements			0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

Expires 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 11/01/23**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,993.30	3,993.30	0.00	7,435.80	7,435.80	0.00	7,435.80	7,435.80	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
<b>WIP</b>	<b>7,435.80</b>	<b>7,435.80</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

11/02/23 15:01:57 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

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**Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
E3 Advisors  
501 West Broadway, Suite 290  
San Diego, CA 92101

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11/02/23 15:01:58 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 393983.00005      Client Name: Krista Freitag, as Receiver for Integrat  
 Date of Last Billing:      Matter Name: Operations & Asset Sales  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/17/23	9280516	Analyze information from Receiver regarding Raw Sports sales order	Fates, Edward (Ted)	0.30	206.55	206.55	WO	HD	TR	_____
07/19/23	9282950	Communications with counsel for Hirschmann and counsel for Master Blends regarding Rari Nutrition	Fates, Edward (Ted)	0.40	275.40	481.95	WO	HD	TR	_____
07/25/23	9287795	Communications with Receiver regarding Rari Nutrition purchase order	Fates, Edward (Ted)	0.30	206.55	688.50	WO	HD	TR	_____
08/16/23	9312338	Communications with Receiver regarding Rari Nutrition operations, vendor and purchase order	Fates, Edward (Ted)	0.30	206.55	895.05	WO	HD	TR	_____
08/31/23	9327713	Discuss motion regarding sales of personal property and sale procedures for real property with Receiver	Fates, Edward (Ted)	0.20	137.70	1,032.75	WO	HD	TR	_____
09/05/23	9334980	Analyze information from Receiver and G. Rodriguez regarding prospective sales of automobiles through luxury car dealers (.6) work on motion for authority to engage dealer and sell automobiles (1.7) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.60	1,790.10	2,822.85	WO	HD	TR	_____



11/02/23 15:01:58 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

**Fees for Matter 393983.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/08/23	9337615	Analyze information from Receiver regarding potential jewelry sales and approach to same	Fates, Edward (Ted)	0.30	206.55	3,029.40	WO	HD	TR	_____
09/21/23	9350023	Work on motion for authority to engage dealers for sales of personal property, sell personal property and engage real estate brokers (2.3) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.70	1,858.95	4,888.35	WO	HD	TR	_____
09/25/23	9354387	Discuss motion for authority to engage auctioneers / brokers with Receiver (.4) work on revisions to same (.7) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.30	895.05	5,783.40	WO	HD	TR	_____
09/26/23	9354340	Meet and confer communications with parties regarding motion for authority to engage brokers and auctioneers (.3) work on Receiver declaration in support of motion (1.1)	Fates, Edward (Ted)	1.40	963.90	6,747.30	WO	HD	TR	_____
09/27/23	9355917	Work on revisions to Receiver declaration and motion regarding engagement of brokers and sale procedures (.8) meet and confer communications with counsel for Hirschmann re: same (1.1)	Fates, Edward (Ted)	1.90	1,308.15	8,055.45	WO	HD	TR	_____
09/28/23	9356724	Further meet and confer communications with counsel for Hirschmann regarding motion to engage auctioneers/brokers and sell personal property of receivership entities (.3) work on proposed order re: same (.2)	Fates, Edward (Ted)	0.50	344.25	8,399.70	WO	HD	TR	_____

11/02/23 15:01:58 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

**Fees for Matter 393983.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/29/23	9358172	Meet and confer with counsel for Hirschmann regarding motion for authority to engage brokers / auctioneers and sell personal property assets of receivership estate (.3) discuss same with Receiver (.3) finalize motion and supporting papers (.2)	Fates, Edward (Ted)	0.80	550.80	8,950.50	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	13.00	688.50	8,950.50
		13.00		\$8,950.50
Subtotal Fees				\$8,950.50
Discount				0.00
Total Fees				8,950.50
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 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 11/01/23**

	Fiscal YTD		Calendar YTD				LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	9,639.00	9,639.00	0.00	9,639.00	9,639.00	0.00	9,639.00	9,639.00	0.00

11/02/23 15:01:58 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

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
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>9,639.00</b>	<b>9,639.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

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**Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
 E3 Advisors  
 501 West Broadway, Suite 290  
 San Diego, CA 92101

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11/02/23 15:01:59 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 393983.00006      Client Name: Krista Freitag, as Receiver for Integrat  
 Date of Last Billing:      Matter Name: Claims & Distributions  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/13/23	9277162	Respond to investor inquiry regarding claim and future distributions	Fates, Edward (Ted)	0.30	206.55	206.55	WO	HD	TR	_____
07/18/23	9281299	Respond to inquiry from counsel for investor	Fates, Edward (Ted)	0.30	206.55	413.10	WO	HD	TR	_____
07/24/23	9286559	Analyze communications to INR-CA investors regarding case and receivership	Fates, Edward (Ted)	0.20	137.70	550.80	WO	HD	TR	_____
07/25/23	9294665	Analysis of the issues related to relief defendant, the assertion of indemnity claims, follow-up with counsel (.4). Research into indemnity, third party claim against receivership entity (.4).	Zaro, David	0.80	716.40	1,267.20	WO	HD	TR	_____
07/25/23	9401982	Analyze legal issues and authorities relating to Francom indemnity claim (1.3).	Fates, Edward (Ted)	1.30	895.05	2,162.25	WO	HD	TR	_____
07/31/23	9293983	Analyze communications from counsel for Francom regarding investor inquiries (.3) communications with counsel for Freedman regarding delivery of vehicles and titles thereto (.3)	Fates, Edward (Ted)	0.60	413.10	2,575.35	WO	HD	TR	_____

11/02/23 15:01:59 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

**Fees for Matter 393983.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/02/23	9300648	Advise Receiver regarding inquiry from E. Francom creditor and response to same (.3) communications with creditor and SEC Counsel re: same (.4)	Fates, Edward (Ted)	0.70	481.95	3,057.30	WO	HD	TR	_____
08/07/23	9305177	Legal analysis of Francom's demand for indemnification and advancement, both under the cited Delaware law and generally (.3).	Robichaud, James	0.30	103.95	3,161.25	WO	HD	TR	_____
08/07/23	9325656	Analyze issues and applicable law re: E. Francom claim/demand for indemnification from assets of INR-CA	Fates, Edward (Ted)	1.20	826.20	3,987.45	WO	HD	TR	_____
08/08/23	9305198	Legal analysis of Francom's demand for indemnification and advancement, both under the cited Delaware law and generally (.2).	Robichaud, James	0.20	69.30	4,056.75	WO	HD	TR	_____
08/09/23	9306149	Advise on issues relating to analysis and response to E. Francom indemnity claim against assets of INR-CA	Fates, Edward (Ted)	0.30	206.55	4,263.30	WO	HD	TR	_____
08/10/23	9308530	Draft arguments in reply to Francom's demand letter (4.1).	Robichaud, James	4.10	1,420.65	5,683.95	WO	HD	TR	_____
08/10/23	9326217	Analyze and advise on issues and strategy for response to E. Francom indemnity claim against INR-CA funds	Fates, Edward (Ted)	0.40	275.40	5,959.35	WO	HD	TR	_____
08/11/23	9308185	Analyze issues and advise on preparation of response to E. Francom claim/demand for indemnification (1.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.50	1,032.75	6,992.10	WO	HD	TR	_____

11/02/23 15:01:59 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

**Fees for Matter 393983.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/11/23	9308538	Call with T. Fates regarding anticipated drafting of Francom reply letter (.2)	Robichaud, James	0.20	69.30	7,061.40	WO	HD	TR	_____
08/14/23	9309578	Communications with counsel for Francom regarding indemnification demand	Fates, Edward (Ted)	0.30	206.55	7,267.95	WO	HD	TR	_____
08/14/23	9311374	Begin drafting letter regarding Francom's indemnification demand (.7).	Robichaud, James	0.70	242.55	7,510.50	WO	HD	TR	_____
08/15/23	9311375	Complete draft and initial revisions of Receiver's reply to Francom's demand letter (2.6).	Robichaud, James	2.60	900.90	8,411.40	WO	HD	TR	_____
08/17/23	9313129	Discuss letter responding to Francom indemnity demand with Receiver (.4) revisions to same (.3) communications with Francom counsel re: same (.2)	Fates, Edward (Ted)	0.90	619.65	9,031.05	WO	HD	TR	_____
08/23/23	9319026	Work on required schedule of known creditors under LR 66-5 (.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.10	757.35	9,788.40	WO	HD	TR	_____
08/29/23	9324340	Analyze comments and information from Receiver for schedule of known creditors (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.70	481.95	10,270.35	WO	HD	TR	_____
08/30/23	9326158	Discuss schedule of known creditors with Receiver (.2) finalize same (.2)	Fates, Edward (Ted)	0.40	275.40	10,545.75	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.80	895.50	716.40
001665	Fates, Edward (Ted)	10.20	688.50	7,022.70

11/02/23 15:01:59 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
002592	Robichaud, James	8.10	346.50	2,806.65
		<u>19.10</u>		<u>\$10,545.75</u>
Subtotal Fees				\$10,545.75
Discount				0.00
Total Fees				10,545.75
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

Expires 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 11/01/23**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	11,991.60	11,991.60	0.00	15,021.00	15,021.00	0.00	15,021.00	15,021.00	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
<b>WIP</b>	<b>15,021.00</b>	<b>15,021.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

11/02/23 15:01:59 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

---

**Billing Address**

---

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
E3 Advisors  
501 West Broadway, Suite 290  
San Diego, CA 92101

---



11/02/23 15:02:00 PROFORMA STATEMENT FOR MATTER 393983.00008 (Krista Freitag, as Receiver for Integrat) (Pending Litigation)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 393983.00008      Client Name: Krista Freitag, as Receiver for Integrat  
 Date of Last Billing:      Matter Name: Pending Litigation  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00008.(Pending Litigation)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
08/18/23	9314035	Analyze notice of termination of investor arbitration matter against INR	Fates, Edward (Ted)	0.20	137.70	137.70	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.20	688.50	137.70
				\$137.70
Subtotal Fees				\$137.70
Discount				0.00
Total Fees				137.70
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

Expires 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

11/02/23 15:02:00 PROFORMA STATEMENT FOR MATTER 393983.00008 (Krista Freitag, as Receiver for Integrat) (Pending Litigation)



**Account Summary – As Of 11/01/23**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	137.70	137.70	0.00	1,514.70	1,514.70	0.00	1,514.70	1,514.70	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
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP Balance</b>	<b>1,514.70</b>	<b>1,514.70</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

**Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
 E3 Advisors  
 501 West Broadway, Suite 290  
 San Diego, CA 92101

11/02/23 15:02:01 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 393983.00009      Client Name: Krista Freitag, as Receiver for Integrat (Ted)  
 Date of Last Billing:      Matter Name: Employment/Fees  
 Proforma Number: 1244137  
 Client/Matter Joint Group # 393983.1      Client Matter Number:

**Fees for Matter 393983.00009.(Employment/Fees)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/21/23	9350110	Advise Receiver on issues/content for first interim fee application	Fates, Edward (Ted)	0.40	275.40	275.40	WO	HD	TR
09/22/23	9351278	Analyze and revise Receiver's first interim fee application (.9) meet and confer communications with SEC counsel regarding fee applications (.2)	Fates, Edward (Ted)	1.10	757.35	1,032.75	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.50	688.50	1,032.75
		1.50		\$1,032.75
Subtotal Fees				\$1,032.75
Discount				0.00
Total Fees				1,032.75
Total Disbursements				0.00

**Attorney Billing Instructions**

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

11/02/23 15:02:01 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

( ) BILL COST ONLY

( ) Transfer All

**Billing Instructions**

Expires 6/30/2024: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 11/01/23**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,239.30	1,239.30	0.00	1,239.30	1,239.30	0.00	1,239.30	1,239.30	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
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>1,239.30</b>	<b>1,239.30</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
 E3 Advisors  
 501 West Broadway, Suite 290  
 San Diego, CA 92101