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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

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

23 Defendants, and

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

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

**FOURTH 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: August 9, 2024
Time: 9:00 a.m.
Ctrm: 9D
Judge: Hon. John W. Holcomb

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

5 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 (“INR”), and
 4 Relief 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 Fourth Interim Application for Payment of Fees and Reimbursement of
 11 Expenses (the “Application”). This Application covers the period from January 1,
 12 2024 through March 31, 2024 (the “Application Period”), and seeks approval of
 13 \$156,533.85 in fees and \$4,326.96 in expenses, and an order authorizing the
 14 Receiver to pay, on an interim basis, 80% of the fees incurred (\$125,227.08) and
 15 100% of the expenses incurred (\$4,326.96).

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 Fifth
 15 Interim Report and Recommendations ("Fifth Report") filed on May 17, 2024
 16 (Dkt. 233), which describes in detail the Receiver's activities during the Application
 17 Period.

18 This Application seeks approval of \$156,533.85 in fees for a total of 289.30
 19 hours worked, and payment on an interim basis of 80% of that amount, or
 20 \$125,227.08. 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 A¹ and is
 22 broken down into the following categories:

23
 24
 25 ¹ While Allen Matkins has made efforts to ensure that its billing entries are
 26 consistent across categories, certain activities lend themselves to more than one
 27 category, or may be difficult to categorize. In any event, Exhibit A reflects the
 28 actual time spent by Allen Matkins personnel, and contains accurate descriptions
 of the services rendered.

Category	Hours	Amount
General Receivership	6.10	\$4,158.45
Asset Investigation & Recovery	271.80	\$144,526.50
Reporting	2.90	\$1,996.65
Operations & Asset Sales	0.30	\$206.55
Claims & Distributions	6.80	\$4,681.80
Employment/Fees	1.40	\$963.90
Total Fees	\$ 289.30	\$156,533.85

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

II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.

A. Categories and Descriptions of Work.

1. General Receivership.

Services in this category relate to assisting the Receiver with matters relating to the general administration of the receivership estate and the underlying litigation. This work included analyzing and advising the Receiver on relevant developments in the case, including discussions and stipulations relating to the extension of case dates and deadlines. The firm also handle various discovery-related matters and responded to Defendant Hirschmann's request that certain personal belongings left at one of the receivership properties be returned to him. Allen Matkins also assisted the Receiver in analyzing and addressing certain tax issues for the Receivership Entities. The reasonable and necessary fees for Allen Matkins' work in this category total \$4,158.45.

2. Asset Investigation & Recovery.

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

- Identifying subpoena targets and issuing subpoenas to financial institutions, vendors, website/domain hosting companies, escrow companies, telecom carriers, recipients of potential receivership assets, and others involved with or otherwise connected to the Receivership Entities or their assets in some manner;
- Issuing demand and asset turnover letters to recipients believed to be in possession of receivership assets in order to enable the Receiver to recover and gain control over the Assets;
- Issuing document preservation letters to recipients believed to be in possession of the Receivership Entities' books and records;
- Gathering, organizing, and reviewing documents and information obtained from third parties including, but not limited to, banking and other financial records, investment records, asset-related purchase and sale documents, legal files, and investor communications;
- Analyzing investor transactions and associated documentation in order to develop a better understanding of the nature and scope of the fraudulent scheme; and
- Addressing discovery disputes, including assertions of attorney-client privilege and privacy rights in connection with various third-party subpoenas.

1 Allen Matkins devoted considerable time to gathering and analyzing
2 documents from third parties and interviewing witnesses for the purpose of
3 evaluating potential claims to recover funds on behalf of the receivership estate.
4 The investigation and analysis has focused on, among other things, tours given by
5 Defendant Hirschmann to prospective investors in the Ponzi scheme at a cannabis
6 facility located in Las Vegas (not owned or operated by the Defendants or Relief
7 Defendants) and the circumstances in which those tours were allowed to take place.
8 These tours were critical to the growth of the Ponzi scheme (investors saw the
9 facility first hand and were lead to believe it was owned and operated by INR) and
10 have taken time to investigative due to the systematic destruction of emails and text
11 messages by persons associated with the scheme and the fact that the owner of the
12 cannabis facility has, thus far, denied having any contact with Hirschmann or any
13 other persons associated with the scheme.

14 The investigation has also focused on the law firms that represented INR and
15 assisted the Defendants and Relief Defendants who were operating the Ponzi
16 scheme. Allen Matkins' investigative work also included planning and preparing
17 for depositions that are expected to take place in July and August 2024. Attorney
18 Ted Fates also attended the depositions of Relief Defendants Tyler Campbell and
19 Michael Delgado, which depositions were taken by counsel for the SEC.

20 Through these efforts, along with her forensic accounting, the Receiver has
21 identified various third parties against whom she plans to pursue claims (including
22 fraudulent transfer claims and potentially others) to recover funds for distribution to
23 investors with losses from the Ponzi scheme. The Court has authorized the Receiver
24 to pursue fraudulent transfer claims and to settle such claims within certain pre-
25 approved parameters. Dkt. 218.

26 Allen Matkins also assisted the Receiver in addressing issues with the
27 Gracemoor Property, including (a) a claim by the homeowners' association
28 ("HOA") that certain construction at the property was not approved by the HOA,

1 and (b) a lien recorded against the property by a vendor of security screens that was
2 not fully paid for a pre-receivership purchase order.

3 The reasonable and necessary fees for Allen Matkins' work in this category
4 total \$144,526.50.

5 **3. Reporting.**

6 Allen Matkins' services in this category were focused on preparing the
7 Receiver's Fourth Report and Recommendations, which was filed on February 13,
8 2024. Dkt. 209. The reasonable and necessary fees for Allen Matkins' work in this
9 category total \$1,996.65.

10 **4. Operations & Asset Sales.**

11 Allen Matkins' services in this category were focused on advising the
12 Receiver regarding issues relating to the prospective sale of real property located in
13 Boise, Idaho (known as the Hacienda Property). The reasonable and necessary fees
14 for Allen Matkins' work in this category total \$206.55.

15 **5. Claims & Distributions.**

16 Services rendered in this category generally relate to the claims and interests
17 of investors and creditors of the Receivership Entities. Allen Matkins assisted with
18 issues related to disseminating information about the receivership to investor and
19 creditors, including notification letters, and information provided on the receivership
20 website (www.inreceivership.com). The firm also assisted in responding to direct
21 inquiries from investors and creditors. Finally, the firm assisted the Receiver in
22 getting an HOA lien recorded in violation of the Preliminary Injunction Order
23 removed from title to the receivership real property located in Las Vegas (known as
24 the Gracemoor Property). The reasonable and necessary fees for Allen Matkins'
25 work in this category total \$4,681.80.

26 **6. Employment/Fees.**

27 Neither the Receiver nor Allen Matkins charge for preparing their own
28 detailed fee applications. Allen Matkins assisted in preparing the Receiver's second

1 interim fee applications and in meeting and conferring with counsel for the
2 Securities and Exchange Commission before the second interim fee applications
3 were filed. The reasonable and necessary fees for Allen Matkins' work in this
4 category total \$963.90.

5 **A. Summary of Expenses Requested for Reimbursement.**

6 Allen Matkins requests that the Court approve reimbursement of \$4,326.96 in
7 out-of-pocket costs. The itemization of such expenses is summarized below by
8 billing category. The majority of the expenses incurred relate to the issuance and
9 service of subpoenas. As explained above, Allen Matkins issued subpoenas and
10 gathered documents from many third parties and financial institutions. Each of
11 these subpoenas required proper service.

12 The total for costs incurred by Allen Matkins during the Application Period is
13 \$4,326.96 and is broken down by category as follows:

Category	Total
E-Discovery	\$517.77
Research (including PACER)	\$70.00
Messenger/FexEx Fees	\$183.04
Service of Process	\$3,313.40
Document Production	\$242.75
Total Fees	\$4,326.96

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

23 “As a general rule, the expenses and fees of a receivership are a charge upon
24 the property administered.” *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).
25 These expenses include the fees and expenses of this Receiver and her professionals,
26 including Allen Matkins. Decisions regarding the timing and amount of an award of
27 fees and costs to the Receiver and her professionals are committed to the sound
28

1 discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)
2 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

3 In allowing fees, a court should consider “the time, labor and skill required,
4 but not necessarily that actually expended, in the proper performance of the duties
5 imposed by the court upon the receiver . . . , the fair value of such time, labor and
6 skill measured by conservative business standards, the degree of activity, integrity
7 and dispatch with which the work is conducted and the result obtained.” *United*
8 *States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation
9 marks omitted). In practical terms, receiver and professional compensation thus
10 ultimately rests upon the result of an equitable, multi-factor balancing test involving
11 the “economy of administration, the burden that the estate may be able to bear, the
12 amount of time required, although not necessarily expended, and the overall value of
13 the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d Cir.
14 1970). Regardless of how this balancing test is formulated, no single factor is
15 determinative and “a reasonable fee is based [upon] all circumstances surrounding
16 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
17 Supp. 465, 480 (S.D. Tex. 1974).

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

25 As previously noted, the Receiver promptly determined that utilizing a few
26 third-party vendors and her experienced staff at E3 as well as experienced, qualified
27 counsel was critical due to the lack of records, size and complexity of the
28 receivership estate. The Receiver sought approval and the Court approved her

1 engagement of Allen Matkins and the ability to file interim reports and fee
2 applications on a quarterly basis via the Order Regarding Aid of Receivership.
3 Dkt. 60, 125.

4 Allen Matkins has submitted a detailed fee application which describes the
5 nature of the services rendered. *See **Exhibit A***. Allen Matkins has endeavored to
6 staff matters as efficiently as possible while remaining cognizant of the complexity
7 of issues presented. As noted above, the request for fees is based on Allen Matkins'
8 customary billing rates charged for comparable services provided in other matters,
9 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for 2.20
10 hours of work (\$1,514.70 in fees).

11 The work performed by Allen Matkins was essential to carrying out the
12 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
13 diligently since the Receiver's appointment to preserve and protect the assets of the
14 receivership estate, maximize the funds available for ultimate distribution to
15 investors, and carry out the Receiver's other duties pursuant to the Appointment
16 Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an
17 interim basis in recognition of the fact that its work in assisting the Receiver is
18 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion
19 of the receivership. Allen Matkins' fees are fair and reasonable and should be
20 approved and paid on an interim basis.

21 **IV. CONCLUSION.**

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

- 23 1. Approving Allen Matkins' fees of \$156,533.85;
- 24 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
25 \$125,227.08, from the assets of the Receivership Entities;

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ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

EDWARD G. FATES
Attorneys for Court-Appointed
Receiver
KRISTA L. FREITAG

EXHIBIT A

04/24/24 18:06:24 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 393983.00002 Client Name: Krista Freitag, as Receiver for Integrat
 Date of Last Billing: 04/11/24 Matter Name: General Receivership
 Proforma Number: 1270265
 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	
01/03/24	9498603	Respond to inquiries from seller of Rari Nutrition business re: tax information needed (.5) communications with Receiver re: same (.3) communications with Receiver and counsel for Hirschmann regarding Hirschmann request for clothing left in Fort Lauderdale condominium (.4)	Fates, Edward (Ted)	1.20	826.20	826.20	WO	HD	TR
01/04/24	9467466	Communications with Receiver and seller of Rari Nutrition business regarding tax issues	Fates, Edward (Ted)	0.60	413.10	1,239.30	WO	HD	TR
01/16/24	9498785	Communications with counsel for Hirschmann regarding request related to Hirschmann personal items left in Florida condominium	Fates, Edward (Ted)	0.40	275.40	1,514.70	WO	HD	TR
01/29/24	9494344	Communications with Receiver and counsel for Hirschmann regarding Hirschmann personal belongings located at Fort Lauderdale condominium	Fates, Edward (Ted)	0.60	413.10	1,927.80	WO	HD	TR
02/27/24	9528084	Analyze proposed stipulation from SEC counsel regarding extension of dates and deadlines in scheduling order and discuss same with Receiver(.4) communications	Fates, Edward (Ted)	0.60	413.10	2,340.90	WO	HD	TR

04/24/24 18:06:24 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

Fees for Matter 393983.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered with counsel for parties re: same (.2)	Timekeeper	Hours	Fees	Sum	Circle Action			
02/28/24	9529142	Communications with counsel and unrepresented parties regarding SEC proposed stipulation to extend dates and deadlines (.4) analyze proposed revisions to stipulation (.3)	Fates, Edward (Ted)	0.70	481.95	2,822.85	WO	HD	TR	_____
03/05/24	9538193	Analyze SEC motion to extend case dates and deadlines (.5) analyze notices of depositions of Delgado and Campbell (.2)	Fates, Edward (Ted)	0.70	481.95	3,304.80	WO	HD	TR	_____
03/06/24	9540103	Communications with SEC counsel and counsel for Murchison regarding SEC subpoena issued to Murchison and document production issues (.4) analyze communications with Credit Union regarding freeze of Delgado accounts (.2)	Fates, Edward (Ted)	0.60	413.10	3,717.90	WO	HD	TR	_____
03/08/24	9544098	Email correspondence with Dan Lim regarding additional productions requested	Pham, Matt D.	0.20	96.30	3,814.20	WO	HD	TR	_____
03/11/24	9544987	Communications with SEC counsel re: Campbell deposition scheduled for 3/12	Fates, Edward (Ted)	0.20	137.70	3,951.90	WO	HD	TR	_____
03/12/24	9546308	Communications with SEC counsel regarding Autobahn property located in Boise	Fates, Edward (Ted)	0.30	206.55	4,158.45	WO	HD	TR	_____

Disbursements for Matter 393983.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
01/01/24	2858583	EDISC – CS Disco, Inc. - Monthly Hosting for January 2024	0.00	152.00	WO	HD	TR	_____

04/24/24 18:06:24 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

Disbursements for Matter 393983.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
01/02/24	2861824	DCSRCH – DCSRCH - Document Research - AT&T - Case SECURITIES AND EXCHANGE COMMISSION VS. INTEGRATED NATIONAL RESOURCES, INC. ET AL, 8:23"CV-00855-JWH-KES - CRINV - 05825 - 492639	0.00	70.00	WO	HD	TR	_____
01/10/24	2861840	ADV – AT&T - Re: Subpoena issued by receiver. Securities and Exchange Commission vs. Integrated National Resources, Inc. et al, 8:23-cv-00855-JWH-KES 3.0 Billed Units and Processing Fee	0.00	120.00	WO	HD	TR	_____
01/16/24	2862797	ADV – AT&T - Re: Subpoena issued by receiver. Securities and Exchange Commission vs. Integrated National Resources et al, 8:23-cv-00855-JWH-KES 3.0 Billed Units and Processing Fee	0.00	195.00	WO	HD	TR	_____
01/19/24	2862448	MSNGR – Federal Express - Ship To: Ms Lisa Ryan - E3 Advisors	0.00	18.09	WO	HD	TR	_____
01/29/24	2862455	MSNGR – Federal Express - Ship To: Matt Pham - Allen Matkins	0.00	18.85	WO	HD	TR	_____
01/30/24	2862679	MSNGR – Federal Express - Ship To: Mr Steve Boden, President - The Conough Estates HOA	0.00	23.23	WO	HD	TR	_____
01/30/24	2862680	MSNGR – Federal Express - Ship To: - Sierra Community Management	0.00	23.23	WO	HD	TR	_____
01/30/24	2862681	MSNGR – Federal Express - Ship To: Andrea Buckman, Trustee Sale O - Association Recovery Services	0.00	24.64	WO	HD	TR	_____
02/01/24	2864626	EDISC – CS Disco, Inc. - Monthly Hosting for February 2024	0.00	162.74	WO	HD	TR	_____
03/01/24	2869065	EDISC – CS Disco, Inc. - Monthly Hosting for March 2024	0.00	203.03	WO	HD	TR	_____
03/06/24	2867860	POS – Nationwide Legal, LLC - Comenity Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	302.70	WO	HD	TR	_____
03/06/24	2867861	POS – Nationwide Legal, LLC - Bank of America, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	172.80	WO	HD	TR	_____

04/24/24 18:06:24 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

Disbursements for Matter 393983.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt					
03/06/24	2867863	POS – Nationwide Legal, LLC - Arvest Bank, Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action to: Arvest Bank	0.00	199.80	WO	HD	TR	_____	
03/06/24	2867864	POS – Nationwide Legal, LLC - Early Warning Services, LLC, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	200.40	WO	HD	TR	_____	
03/06/24	2867865	POS – Nationwide Legal, LLC - Bank of Hawaii, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	303.80	WO	HD	TR	_____	
03/06/24	2867867	POS – Nationwide Legal, LLC - First Fidelity Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	303.80	WO	HD	TR	_____	
03/06/24	2867869	POS – Nationwide Legal, LLC - Fidelity Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	299.80	WO	HD	TR	_____	
03/06/24	2873545	COURT – Other Court Charges - Matt Pham (002510) - SECURE-SHARE.COM - FedEx Document Request Response	0.00	75.00	WO	HD	TR	_____	
03/07/24	2867862	POS – Nationwide Legal, LLC - PayPal, Inc., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	174.00	WO	HD	TR	_____	
03/07/24	2867866	POS – Nationwide Legal, LLC - One Nevada Credit Union, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	282.70	WO	HD	TR	_____	
03/07/24	2867868	POS – Nationwide Legal, LLC - MidFirst Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	303.80	WO	HD	TR	_____	
03/07/24	2867870	POS – Nationwide Legal, LLC - Truist Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.80	WO	HD	TR	_____	
03/07/24	2867871	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, National Association, SUBPOENA TO PRODUCE	0.00	55.80	WO	HD	TR	_____	

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Disbursements for Matter 393983.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
03/07/24	2867872	DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Nationwide Legal, LLC - Wells Fargo Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.20	WO	HD	TR	_____
03/15/24	2867638	ODS – One Nevada Credit Union - Document production in response to subpoena issued by the Receiver, Krista Freitag	0.00	122.75	WO	HD	TR	_____
03/18/24	2867637	ODS – PayPal, Inc. - Document production in response to subpoena issued by the Receiver, Krista Freitag	0.00	120.00	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.90	688.50	4,062.15
002510	Pham, Matt D.	0.20	481.50	96.30
		6.10		\$4,158.45
Subtotal Fees				\$4,158.45
Discount				0.00
Total Fees				4,158.45
Total Disbursements				4,326.96

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 04/24/24

Fiscal YTD

Calendar YTD

LTD

04/24/24 18:06:24 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	37,853.55	36,530.55	1,323.00	16,134.06	11,807.10	4,326.96	121,234.67	67,634.10	53,600.57
Unbilled Adj	16.40	0.00	16.40	0.00	0.00	0.00	1,942.40	1,926.00	16.40
Billed	90,531.86	41,258.25	49,273.61	90,531.86	41,258.25	49,273.61	41,258.25	41,258.25	49,273.61
Collected	90,531.86	41,258.25	49,273.61	90,531.86	41,258.25	49,273.61	90,531.86	41,258.25	49,273.61
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	43,658.72	26,375.85	17,282.87						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

04/24/24 18:06:25 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 393983.00003 Client Name: Krista Freitag, as Receiver for Integrat
 Date of Last Billing: 04/11/24 Matter Name: Asset Investigation & Recovery
 Proforma Number: 1270265
 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	
01/02/24	9465385	Communications with Receiver and counsel for investor group re: accounting and settlement payments	Fates, Edward (Ted)	0.90	619.65	619.65	WO	HD	TR
01/03/24	9498599	Communications with counsel for investors re: accounting issues and INR settlement payments	Fates, Edward (Ted)	0.40	275.40	895.05	WO	HD	TR
01/05/24	9469441	Cursory review of document productions from Bank of America, Capital One, Cox Communications, Frontier Communications, Jomex, Sundial Title Agency, T-Mobile, Verizon, Windstream Services	Pham, Matt D.	2.50	1,203.75	2,098.80	WO	HD	TR
01/08/24	9471543	Communications with SEC counsel regarding Campbell and Delgado discovery issues (.4) analyze revisions to proposed protective order (.4)	Fates, Edward (Ted)	0.80	550.80	2,649.60	WO	HD	TR
01/09/24	9498629	Advise Receiver on issues relating to photographs taken by investor of Qualcan cannabis facility and transmittal of same (.5) communications with counsel for investor group re: same (.4) analyze legal issues	Fates, Edward (Ted)	2.30	1,583.55	4,233.15	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	
		raised in Qualcan defense of investor claims (.9) communications with SEC counsel re: same and next steps regarding Qualcan (.5)							
01/10/24	9475290	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	33.75	4,266.90	WO	HD	TR
01/10/24	9477819	Email correspondence with Regions Bank representative regarding missing wire transfer (0.3); Phone call with AT&T representative regarding subpoena relating to IP addresses (0.2)	Pham, Matt D.	0.50	240.75	4,507.65	WO	HD	TR
01/10/24	9477821	Virtually meet with Krista Freitag and Ted Fates regarding case updates and outstanding tasks	Pham, Matt D.	0.60	288.90	4,796.55	WO	HD	TR
01/10/24	9498642	Discuss document review and investigative tasks relating to Murchison and other law firms with Receiver (.8) communications with SEC counsel re: call with counsel for Campbell (.4) communications with Receiver and counsel for investor regarding photo files for photos taken of Las Vegas cannabis facility (.7) discuss subpoena responses and investigative tasks relating to banks, Montgomery, Flanagan, Delgado, and Campbell with Receiver (.7)	Fates, Edward (Ted)	2.60	1,790.10	6,586.65	WO	HD	TR
01/11/24	9474570	Communications with counsel for Qualcan re: investigative issues (.4) discuss investigative issues relating to Campbell and Flanagan with Receiver (.9) communications with SEC counsel (.4) call	Fates, Edward (Ted)	2.70	1,858.95	8,445.60	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	
		with counsel for Campbell and counsel for SEC re: investigative / discovery issues relating to Campbell (.6) communications with Delgado and counsel for SEC regarding outstanding requests for documents and information (.4)							
01/11/24	9477825	Phone call with Regions Bank representative regarding missing wire transfer and email correspondence with Lisa Ryan regarding same (0.1); Phone call with Krista Freitag regarding IP address data and other information from recent document productions (1.1)	Pham, Matt D.	1.20	577.80	9,023.40	WO	HD	TR _____
01/12/24	9475850	Analyze and advise on outstanding investigative tasks relating to Hirschmann and related entities (.5) call with counsel for SEC and A. Levin (Greenberg Traurig) re: representation of INR, document production, and related issues (.6) discuss issues relating to OCGM entity with Receiver (.3)	Fates, Edward (Ted)	1.40	963.90	9,987.30	WO	HD	TR _____
01/15/24	9477750	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	168.75	10,156.05	WO	HD	TR _____
01/16/24	9479107	Gather and analyze information relating to investor tours of Qualcan facility in Las Vegas (.8) communications with Receiver and G. Rodriguez re: same (.4) communications with counsel for Qualcan and SEC counsel re: same (.8) analyze further investor communications relating to information about tours (.5)	Fates, Edward (Ted)	2.50	1,721.25	11,877.30	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			
01/16/24	9484859	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	101.25	11,978.55	WO	HD	TR	_____
01/18/24	9498809	Prepare for and attend conference call with counsel for Qualcan and SEC counsel regarding investor tours of Las Vegas cannabis facility (.8) call with Receiver and A. Herren re: information about investors tours (.4) further communications with counsel for Qualcan (.3) discuss document productions and privilege issues with Receiver (.3) analyze recorded conversations provided by investor (.5) analyze Delgado discovery responses (.3)	Fates, Edward (Ted)	2.60	1,790.10	13,768.65	WO	HD	TR	_____
01/19/24	9498820	Analyze and advise Receiver on subpoenaed records, strategy and investigative approach, status and next steps for further investigative tasks, asset recovery and forensic accounting issues (1.6) analyze Court changes to stipulation protective order submitted by SEC counsel (.3)	Fates, Edward (Ted)	1.90	1,308.15	15,076.80	WO	HD	TR	_____
01/22/24	9492831	Virtually meet with Krista Freitag and Ted Fates regarding potential topics of depositions of Delgado, Montgomery, Campbell, and Flanagan (1.5); Virtually meet with SEC personnel, Krista Freitag, and Ted Fates regarding SEC's proposed depositions of relief defendants (1.8); Begin preparing additional subpoenas to financial institutions and miscellaneous entities (2.3)	Pham, Matt D.	5.60	2,696.40	17,773.20	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	
01/22/24	9498838	Call/emails with Receiver and counsel to discuss investigative tasks, strategy and next steps relating to Delgado, Montgomery, Campbell and related entities (2.6) emails with counsel for parties regarding protective order and document productions (.4) Call with SEC counsel and Receiver re: investigative tasks, issues, and discovery (1.8)	Fates, Edward (Ted)	4.80	3,304.80	21,078.00	WO	HD	TR
01/23/24	9487272	Advise on SEC requests for document productions and responses thereto, subpoenas and follow-up on investigative tasks (.8) discuss document review and new information received with Receiver (.5)	Fates, Edward (Ted)	1.30	895.05	21,973.05	WO	HD	TR
01/23/24	9488977	Review certain documents and search online for additional useful information regarding Bruce Mogel, Mike Delgado/Garcia, Hirschmann, the mid-2000s medical Ponzi, and for any public deposition transcripts of any persons relating to the above (1.5).	Robichaud, James	1.50	519.75	22,492.80	WO	HD	TR
01/23/24	9492837	Cursory review of recent document productions from AT&T, Lisa Goldstein, Security Assessment Group, and Verizon (1.7); Coordinate with process server regarding service of subpoenas on Matthew Ghiatis in Oklahoma (0.2); Phone call with client regarding AT&T and Verizon document productions (0.2)	Pham, Matt D.	2.10	1,011.15	23,503.95	WO	HD	TR
01/24/24	9489511	Analyze investor documents and photos regarding tours taken of Las Vegas cannabis facility (.9) communications with	Fates, Edward (Ted)	2.60	1,790.10	25,294.05	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			
		G. Rodriguez re: receipt of photos from investor (.2) communications with counsel for investors re: same (.4) call with SEC counsel and Receiver re: depositions, discovery and other investigative tasks (.8) discuss same with Receiver (.3)								
01/24/24	9492843	Virtually meet with SEC personnel, Krista Freitag, and Ted Fates regarding relief defendants (0.9); Phone call with client regarding document productions from telecom companies (0.2)	Pham, Matt D.	1.10	529.65	25,823.70	WO	HD	TR	_____
01/24/24	9493059	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	337.50	26,161.20	WO	HD	TR	_____
01/25/24	9495351	Follow up communications with counsel for Qualcan (.8) communications with SEC counsel regarding discovery and outstanding requests (.4)	Fates, Edward (Ted)	1.20	826.20	26,987.40	WO	HD	TR	_____
01/26/24	9490776	Communications with counsel for Qualcan and SEC counsel regarding subpoena responses	Fates, Edward (Ted)	0.40	275.40	27,262.80	WO	HD	TR	_____
01/26/24	9493177	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	101.25	27,364.05	WO	HD	TR	_____
01/29/24	9494341	Analyze issues relating to violation of HOA rules for Gracemoor property by tenant by posting of signs (.4) discuss same with Receiver and G. Rodriguez (.5)	Fates, Edward (Ted)	0.90	619.65	27,983.70	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		
01/30/24	9495201	Analyze facts relating to investor tours of cannabis facility (.3) follow up calls/emails with counsel for Qualcan and counsel for investors re: same (1.8) communications with Receiver and G. Rodriguez re: HOA violation at Gracemoor relating to exterior signs (.3) communications with HOA management company (.4) advise on issues for subpoenas relating to Murchison, R. Flanagan, L. Cruz (.4) communications with G. Rodriguez re: photos from investor smart phone (.4) communications with SEC counsel regarding discovery requests (.2)	Fates, Edward (Ted)	3.80	2,616.30	30,600.00	WO	HD	TR	_____
01/30/24	9499155	Confer with Ted Fates regarding additional subpoenas (0.3); Review and analyze Qualcan's document production (0.4); Continue preparing additional subpoenas to banks and miscellaneous entities (3.2)	Pham, Matt D.	3.90	1,877.85	32,477.85	WO	HD	TR	_____
01/31/24	9496340	Communications with counsel for investor re: case against Qualcan and pleadings related to same	Fates, Edward (Ted)	0.30	206.55	32,684.40	WO	HD	TR	_____
01/31/24	9496874	Confer with M. Pham as to deposition strategy (0.2).	Del Castillo, Joshua	0.20	137.70	32,822.10	WO	HD	TR	_____
01/31/24	9498687	Communication with HOA management company for Gracemoor property re: violation relating to tenant's exterior signs (.3) communications with Receiver re: Qualcan issues, anticipated subpoena and depositions (.4) communications with counsel for investor with lawsuit against Qualcan (.8) analyze SEC filings for Mystic Holdings (.5)	Fates, Edward (Ted)	2.00	1,377.00	34,199.10	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			
01/31/24	9499204	Phone call with Frontier Western Properties' counsel regarding subpoena (0.1); Review and analyze document productions from Murchison, KHRR, Selhorst, and Loretta Cruz (0.9); Continue preparing deposition subpoenas to Murchison, Ryan Flanagan, and Loretta Cruz (2.4); Confer with James Robichaud regarding subject matters for Murchison PMK deposition (0.4)	Pham, Matt D.	3.80	1,829.70	36,028.80	WO	HD	TR	_____
02/01/24	9499696	Communications with counsel for investor with claims against Qualcan regarding pleadings filed in case (1.2) analyze pleadings and allegations (.7) calls/emails with HOA management company and collection agency re: violation relating to exterior signs and lien recorded in violation of stay (1.3) advise on issues and investigative steps relating to M. Ghaitis / TrVst3d (.5) communications with counsel for L. Cruz re: HOA violation for signs and surrender of possession of property at end of lease term (.9) communications with Receiver and G. Rodriguez re: HOA lien release, vendor lien, and Qualcan issues (.7) analyze and advise G. Rodriguez on parking space lease issue (.3) analyze documents from screen vendor (.4) communications with counsel for screen vendor re: recorded lien (.5)	Fates, Edward (Ted)	6.50	4,475.25	40,504.05	WO	HD	TR	_____
02/01/24	9503742	Phone call with Matthew Ghiatis regarding subpoenas and information relating to Joseph Domino (1.1); Confer with Ted Fates regarding Loretta Cruz, Matthew	Pham, Matt D.	2.90	1,396.35	41,900.40	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	
		Ghiatis, and deposition subpoenas (0.3); Phone call with Ryan Lopez regarding information relating to Joseph Domino (0.4); Email correspondence with Krista Freitag regarding recap of phone call with Matthew Ghiatis (0.5); Review and analyze Murchison & Cumming's document production in preparation for deposition (0.6)							
02/01/24	9503941	Review pending complaint against Murchison and related analysis (1.2).	Robichaud, James	1.20	415.80	42,316.20	WO	HD	TR
02/02/24	9503756	Continue preparing deposition subpoenas to PMKs for Qualcan and Murchison (2.7); Phone calls with Matthew Ghiatis regarding follow-up information in response to subpoena (1.6)	Pham, Matt D.	4.30	2,070.45	44,386.65	WO	HD	TR
02/02/24	9503938	Analysis of documents in connection with Murchison, Flanagan, and related depositions, and confer with M. Pham regarding same (3.6).	Robichaud, James	3.60	1,247.40	45,634.05	WO	HD	TR
02/03/24	9504337	Further analysis regarding timing of payments and communications between and among firms (1.9).	Robichaud, James	1.90	658.35	46,292.40	WO	HD	TR
02/05/24	9503940	Analyze and advise on investigative issues relating Ghiatis, Domino and Qualcan (.9) analyze SEC subpoena to Murchison firm (.2) analyze Delgado responses to requests and statements concerning liability (1.6) discuss same and Ghiatis / Domino issues with Receiver (.4)	Fates, Edward (Ted)	3.20	2,203.20	48,495.60	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		
02/05/24	9511419	Review and analyze notes from Murchison interview and document production from Murchison and others for preparation of additional subpoenas to and deposition of Murchison (2.3); Confer with Ted Fates regarding recap of phone calls with Matthew Ghiatis and deposition subpoenas (0.8); Continue preparing deposition and document subpoenas to Murchison Cumming LLP and Ryan Flanagan (1.6); Email correspondence with client regarding recap of additional phone calls with Matthew Ghiatis (0.8)	Pham, Matt D.	5.50	2,648.25	51,143.85	WO	HD	TR	_____
02/05/24	9518153	Investigation of Mystic and persons involved therewith (5.1)	Robichaud, James	5.10	1,767.15	52,911.00	WO	HD	TR	_____
02/06/24	9506357	Communications with counsel for vendor regarding lien recorded on Gracemoor property (.2) analyze issues and advise Receiver re: same (.4) review correspondence from SEC and advise on issues re: document production (.5) analyze and advise on L. Cruz issues (.5) discuss investigative tasks relating to Qualcan, Ghiatis and Domino with Receiver (.4) revisions to deposition and document subpoenas to be issued to Qualcan, Murchison and Flanagan (1.3)	Fates, Edward (Ted)	3.30	2,272.05	55,183.05	WO	HD	TR	_____
02/06/24	9511422	Continue preparing deposition and document subpoenas to Murchison and Flanagan (1.1); Review and analyze Qualcan's document productions, website, and securities filings and other parties' productions in preparation of additional	Pham, Matt D.	5.20	2,503.80	57,686.85	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	
		subpoenas to and deposition of Qualcan (2.5); Continue preparing deposition and document subpoenas to Qualcan (1.6)							
02/06/24	9511423	Research into individuals and entities connected to Qualcan, Joseph Domino, Mike Delgado, Mike Garcia (2.1); Email correspondence with Deanna Rilling regarding request for Zoom meeting (0.2)	Pham, Matt D.	2.30	1,107.45	58,794.30	WO	HD	TR
02/06/24	9518156	Investigation of Mystic and persons involved therewith and draft correspondence with M. Pham regarding relationship between related entities and persons (4.4)	Robichaud, James	4.40	1,524.60	60,318.90	WO	HD	TR
02/07/24	9506069	Analyze further research and information relating to Delgado, Hirschmann, Domino and Qualcan (.8) advise on strategy and next steps for investigation and discovery requests (.7) advise Receiver re: same (.4) call with counsel for investor with claims against Mystic / Qualcan (.5) communications with Receiver re: scheduling call with D. Rilling (.2) call with Receiver regarding investigative tasks and strategy relating to Qualcan, Domino, Delgado, Ghiatis, and others (1.5) communications with Receiver and HOA for Gracemoor re: lien release (.3)	Fates, Edward (Ted)	4.20	2,891.70	63,210.60	WO	HD	TR
02/07/24	9511428	Confer with Ted Fates regarding information regarding Qualcan, Roacho, etc. uncovered by James Robichaud (0.6); Review and analyze document productions from Loretta Cruz and others and notes	Pham, Matt D.	3.40	1,637.10	64,847.70	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	
		from interview with Loretta Cruz in preparation of additional subpoena and deposition of Loretta Cruz (1.7); Continue preparing additional document subpoena to Loretta Cruz (1.1)							
02/07/24	9511429	Virtually meet with Krista Freitag, Ted Fates, and James Robichaud regarding new information uncovered regarding Qualcan, Michael Delgado, and other persons of interest (1.6); Continue researching into individuals and entities connected to Qualcan, Joseph Domino, Mike Delgado, Mike Garcia (1.4)	Pham, Matt D.	3.00	1,444.50	66,292.20	WO	HD	TR
02/07/24	9518157	Review background of counsel for Mystic's IPO (1.2); review past Mystic and Qualcan litigation (1.0); prepare for and attend call with K. Freitag, T. Fates, and M. Pham (1.0); draft list of persons for further investigation along with M. Pham, in addition to list of known related assets and persons (1.4).	Robichaud, James	4.60	1,593.90	67,886.10	WO	HD	TR
02/08/24	9508378	Analyze and advise on edits and additions to Receiver task list for investigator relating to Qualcan, Domino, Delgado, Garcia and others (.6) discuss same with Receiver (.4) analyze social media information relating to Qualcan, Roacho, and others (.5) advise on subpoenas to Qualcan, Flanagan, Cruz and strategy re: service, meet and confer issues, and Ghiatis email issues (.8) analyze Delgado discovery-related court filings (.2) analyze Domino bank information from Receiver (.2) advise on issues relating	Fates, Edward (Ted)	4.30	2,960.55	70,846.65	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	
		to prospective local counsel in Las Vegas, discuss same with Receiver (.6) revisions to subpoenas to Cruz (.4) analyze additional information relating to scope of Murchison representation and prior representations from Flanagan re: same (.4) communications with prospective local counsel (.3)							
02/08/24	9511431	Continue preparing additional subpoena to Loretta Cruz (1.0); Continue preparing subpoenas to various financial institutions and miscellaneous entities (2.8)	Pham, Matt D.	3.80	1,829.70	72,676.35	WO	HD	TR
02/08/24	9511433	Confer with Ted Fates regarding revisions to draft subpoenas, logistics of depositions (0.4); Email correspondence with Chip Farrell of Murchison law firm regarding service of additional subpoenas (0.3); Review supplemental production from KHRR and phone call with Zion Lovingier of KHRR regarding additional subpoena (0.2); Email correspondence with client regarding KHRR's supplemental production and missing documents from Murchison's production (0.5); Review and analyze document productions from telecom companies regarding phone logs (0.8)	Pham, Matt D.	2.20	1,059.30	73,735.65	WO	HD	TR
02/09/24	9508648	Analyze report from investigator and advise on next steps	Fates, Edward (Ted)	0.40	275.40	74,011.05	WO	HD	TR
02/09/24	9511437	Continue preparing new subpoenas to Bank of America, JPMorgan Chase Bank, and Wells Fargo (3.0); Continue preparing new subpoenas to Arvest Bank, Bank of Hawaii,	Pham, Matt D.	5.40	2,600.10	76,611.15	WO	HD	TR

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02/09/24	9511438	Make revisions to subpoenas to Murchison firm and Flanagan based on new information	Pham, Matt D.	1.20	577.80	77,188.95	WO	HD	TR	_____
02/12/24	9510843	Analyze and advise on investigation into Maserati sale and potential claim for recovery relating to same (.4) call with Receiver and D. Rilling regarding PR and related work done for INR (.8) discuss same and next steps re: investigation with Receiver (.6)	Fates, Edward (Ted)	1.80	1,239.30	78,428.25	WO	HD	TR	_____
02/12/24	9519909	Email correspondence with Intuit and Dropbox counsel regarding follow-up to subpoenas (0.3); Make revisions to subpoenas for Murchison, Flanagan, Qualcan based on new information (0.6); Review and analyze production from Deanna Rilling and other parties in preparation of follow-up meeting with Rilling (1.0); Virtually meet with Deanna Rilling, Krista Freitag, and Ted Fates regarding follow-up questions on INR (0.7); Phone call with Krista Freitag and Ted Fates regarding responses provided by Deanna Rilling and follow-ups (0.6); Continue preparing additional subpoenas to miscellaneous individuals and entities (2.3)	Pham, Matt D.	5.50	2,648.25	81,076.50	WO	HD	TR	_____
02/13/24	9513300	Analyze and advise on issues and strategy for investigative tasks, document review, subpoenas and preparation for depositions (1.1) emails/call with Receiver and G.	Fates, Edward (Ted)	1.60	1,101.60	82,178.10	WO	HD	TR	_____

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		Rodriguez re: capturing of social media accounts (.5)								
02/13/24	9517227	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.50	168.75	82,346.85	WO	HD	TR	_____
02/13/24	9519917	Phone call with Muskrat 888's representative regarding subpoena (0.2); Review and analyze document production from Murchison in preparation for deposition (1.8); Confer with Ted Fates regarding subpoenas and follow-ups with various subpoenaed parties (0.5); Email correspondence with client regarding TRVST3D, Two Dogs Transport, and Matthew Ghiatis (0.4); Virtually meet with Krista Freitag, Geno Rodriguez, Ted Fates regarding preservation of subpoena targets' social media posts and profiles (0.3); Follow-up phone call with Kanisha Lowe regarding interactions with Mike Garcia and Mike Delgado (0.9); Email correspondence with client regarding additional information provided by Kanisha Lowe regarding Mike Garcia (0.6)	Pham, Matt D.	4.70	2,263.05	84,609.90	WO	HD	TR	_____
02/14/24	9513919	Analyze and advise on information obtained from subpoena targets, follow up requests, strategy re: identifying links and aliases used (.9) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.20	826.20	85,436.10	WO	HD	TR	_____
02/14/24	9519922	Phone call with Dropbox's in-house counsel regarding subpoena and follow-up requests (0.2); Phone call with Krista Freitag regarding information provided by Kanisha	Pham, Matt D.	0.50	240.75	85,676.85	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Low and related issues (0.3)								
02/15/24	9519927	Phone call with Krista Freitag regarding results of people search of additional targets (0.6); Review and analyze BMI database relating to entries for Michael Delgado and Von Ukuf (1.5)	Pham, Matt D.	2.10	1,011.15	86,688.00	WO	HD	TR	_____
02/15/24	9520363	Communications with Receiver regarding subpoenas and investigative tasks (.3) communications with SEC counsel regarding discovery issues (.3)	Fates, Edward (Ted)	0.60	413.10	87,101.10	WO	HD	TR	_____
02/16/24	9517322	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.70	236.25	87,337.35	WO	HD	TR	_____
02/16/24	9519937	Phone call with Intuit's counsel regarding subpoena (0.2); Continue reviewing documents from Murchison's document production (2.3)	Pham, Matt D.	2.50	1,203.75	88,541.10	WO	HD	TR	_____
02/16/24	9520189	Continue preparing additional subpoenas and follow-up letters to various subpoena targets (2.0); Phone call with Deanna Rilling regarding information on Von Ukuf/Michael Delgado (0.5); Update and revise schedule of defendants' identifying information for subpoenaed parties to run searches (1.4)	Pham, Matt D.	3.90	1,877.85	90,418.95	WO	HD	TR	_____
02/19/24	9527197	Analysis of phone and IP records, including cross-referencing to identify phone numbers of interest (2.0); review bank records on payments to firms and other individuals including by cross-referencing to tour dates and firm invoices (1.6).	Robichaud, James	3.60	1,247.40	91,666.35	WO	HD	TR	_____

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02/20/24	9518764	Analyze communications and information from counsel for Mystic / Qualcan (.6) discuss same with Receiver (.2) analyze reports from investigator (.7)	Fates, Edward (Ted)	1.50	1,032.75	92,699.10	WO	HD	TR	_____
02/20/24	9525902	Review social media imaging samples and email correspondence with client regarding same (0.3)	Pham, Matt D.	0.30	144.45	92,843.55	WO	HD	TR	_____
02/20/24	9527023	Review social media recording/imaging done to date and confer with M. Pham regarding methods (.5).	Robichaud, James	0.50	173.25	93,016.80	WO	HD	TR	_____
02/20/24	9527032	Research status of jet and yacht associated with Mystic entities (1.0).	Robichaud, James	1.00	346.50	93,363.30	WO	HD	TR	_____
02/21/24	9521266	Calls/emails with Receiver re: advice on investigative tasks, subpoenas, document analysis, next steps, issues and strategy	Fates, Edward (Ted)	2.90	1,996.65	95,359.95	WO	HD	TR	_____
02/21/24	9525906	Review and analyze email from Thomas Puzzo regarding Greg Cosio (0.2); Virtually meet with Krista Freitag, Ted Fates, and James Robichaud regarding outstanding investigatory tasks (1.0); Confer with James Robichaud regarding outstanding potential subpoena targets and information sought therefrom (0.5); Second virtual meeting with Krista Freitag, Ted Fates, and James Robichaud regarding outstanding investigatory tasks (1.1); Confer with James Robichaud regarding hot documents in Murchison document production (0.4); Phone call with Krista Freitag regarding email addresses sought for Intuit subpoena	Pham, Matt D.	4.10	1,974.15	97,334.10	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		search (0.1); Email correspondence with Hassan Shareef regarding request for phone call (0.2); Perform additional research on potential identity of Von Ukuf (0.6)							
02/21/24	9527018	Meeting with T. Fates; K. Freitag; and M. Pham regarding outstanding investigative tasks (2.2); review and update social media accounts to be tracked and imaged (.6); review Murchison invoices in light of recent developments and cross-reference visits and calls to available information (1.1).	Robichaud, James	3.90	1,351.35	98,685.45	WO	HD	TR _____
02/21/24	9535083	Continue preparing additional subpoenas to miscellaneous individuals and entities (1.7); Continue drafting follow up letters to subpoenaed parties (0.4)	Pham, Matt D.	2.10	1,011.15	99,696.60	WO	HD	TR _____
02/22/24	9522397	Analyze additional information gathered by investigator, Receiver and counsel (1.7) discuss same with Receiver (.9) advise on strategy for upcoming depositions of L. Cruz and R. Flanagan (.4) analyze info and prepare for call with SEC counsel (.6) call with Receiver and SEC counsel (1.0)	Fates, Edward (Ted)	4.60	3,167.10	102,863.70	WO	HD	TR _____
02/22/24	9525932	Email correspondence with Krista Freitag and Ted Fates regarding new information on Michael Delgado, Von Ukuf, Mike Garcia (0.4); Phone call with Ted Fates regarding forthcoming phone calls with Ethan Hunt and Hassan Shareef (0.2); Email correspondence with client regarding information on Hassan Shareef/Meniffee Ameer (0.3); Phone call with Ethan Hunt	Pham, Matt D.	4.70	2,263.05	105,126.75	WO	HD	TR _____

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		regarding interactions with Mike Von Kaiser (0.9); Phone call with Hassan Shareef regarding interactions with defendants (0.7); Virtually meet with Dan Lim, Krista Freitag, and Ted Fates regarding new information on Mike Garcia, Qualcan (1.0); Phone call with Krista Freitag and Ted Fates regarding new information from Ethan Hunt and Hassan Shareef (0.4); Phone call with Dr. Michael Fitzgibbons regarding information on Bruce Mogel, Michael Delgado, and Ralph Hirschmann (0.8)								
02/22/24	9527043	Prepare summary of certain entities associated with Dickinson Wright attorneys for further review (.7).	Robichaud, James	0.70	242.55	105,369.30	WO	HD	TR	_____
02/23/24	9523490	Emails with SEC counsel, Delgado and counsel for Freedman re: discovery issues and scheduling (.5) discuss scope and parameters of forensic accounting with Receiver (.6) discuss Google data production issues with Receiver (.2)	Fates, Edward (Ted)	1.30	895.05	106,264.35	WO	HD	TR	_____
02/23/24	9525935	Follow-up phone call with Hassan Shareef regarding interactions with defendants (0.8); Email correspondence with Intuit's outside counsel regarding additional email addresses for search and other issues (0.3); Email correspondence with FedEx representative regarding additional searches based on transactional information (0.2);	Pham, Matt D.	1.30	625.95	106,890.30	WO	HD	TR	_____
02/23/24	9527046	Review corporate filing history of Mystic and affiliated entities, and related litigation (2.0).	Robichaud, James	2.00	693.00	107,583.30	WO	HD	TR	_____

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02/26/24	9525975	Analyze and advise Receiver on issues relating to analysis of Paypal and Zelle electronic payments (.3) revisions to meet and confer letter to automobile dealership re: redactions to document production (.5) analyze info relating to broker for investors and Mike Garcia issues (.4)	Fates, Edward (Ted)	1.20	826.20	108,409.50	WO	HD	TR	_____
02/26/24	9534952	Draft meet-and-confer letter to Ferrari of Newport Beach (1.5); Prepare form meet-and-confer letter to subpoenaed parties regarding non-response or inadequate response (0.6); Make revisions to and finalize meet-and-confer letter to Ferrari of Newport Beach (0.3); Email correspondence with Krista Freitag regarding Shareef Hassan and Michael Garcia (0.5)	Pham, Matt D.	2.90	1,396.35	109,805.85	WO	HD	TR	_____
02/27/24	9528005	Discuss investigative tasks and strategy with Receiver (.3) review notice of T. Campbell deposition (.1) advise on subpoenas and service issues (.2) analyze info from Receiver re: contractor targets for subpoenas (.2)	Fates, Edward (Ted)	0.80	550.80	110,356.65	WO	HD	TR	_____
02/28/24	9535008	Email correspondence with Hassan Shareef regarding requested document production (0.5); Phone call with Matthew Ghiatis regarding consent to email access to Two Dogs Transport and TRVST3D accounts (0.1); Continue preparing follow-up/meet and confer letters to subpoenaed parties (0.6); Review and analyze form consent agreement from Dropbox for production of	Pham, Matt D.	1.40	674.10	111,030.75	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered documents (0.2)	Timekeeper	Hours	Fees	Sum	Circle	Action	
02/29/24	9532934	Analyze and advise on investigative tasks, subpoenas, next steps and strategy (.8) communications with Receiver and SEC counsel (.4) analyze and advise Receiver on issues relating to Florida property purchase using Ponzi scheme funds (.6) discuss investigative tasks and strategy relating to Hirschmann, Williams, Garcia, Qualcan and Ghiatis/TrVust3d with Receiver (1.6) analyze Google pay records (.4)	Fates, Edward (Ted)	3.80	2,616.30	113,647.05	WO	HD	TR _____
02/29/24	9535031	Confer with Ted Fates regarding Dropbox consent issue and updates on subpoenas (0.3); Review document sent by Michael Fitzgibbons and further email correspondence with him regarding additional information (0.3);	Pham, Matt D.	0.60	288.90	113,935.95	WO	HD	TR _____
03/01/24	9535727	Legal analysis regarding responsiveness of private flight manifests to FOIA and subpoena by CBP/FAA, and consult M. Pham regarding discovery plan (1.0); legal analysis regarding HIPAA subpoena exception (1.0).	Robichaud, James	2.00	693.00	114,628.95	WO	HD	TR _____
03/01/24	9535791	Calls with Receiver to discuss issues relating to Garcia/VonKaiser, Cruz, Hirschmann, Qualcan, and Williams (.8) call to discuss same and related issues with Receiver and SEC counsel (1.1) analyze Montgomery responses to discovery requests (.8)	Fates, Edward (Ted)	2.70	1,858.95	116,487.90	WO	HD	TR _____

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03/01/24	9536567	Phone call with Krista Freitag and Ted Fates regarding investigatory updates and information to disclose to SEC	Pham, Matt D.	0.50	240.75	116,728.65	WO	HD	TR	_____
03/01/24	9536580	Phone call with Dan Lim, Krista Freitag, and Ted Fates regarding information on relief defendants, Mike Garcia, and document productions	Pham, Matt D.	1.30	625.95	117,354.60	WO	HD	TR	_____
03/01/24	9536583	Phone call with Hassan Shareef regarding documents to be produced	Pham, Matt D.	0.10	48.15	117,402.75	WO	HD	TR	_____
03/04/24	9536531	Analyze and advise on next steps for subpoenas, discovery and service issues	Fates, Edward (Ted)	0.40	275.40	117,678.15	WO	HD	TR	_____
03/04/24	9544059	Email correspondence with Hassan Shareef regarding documents produced	Pham, Matt D.	0.20	96.30	117,774.45	WO	HD	TR	_____
03/05/24	9538430	Analyze and advise on investigative tasks relating to Garcia, Qualcan and Domino	Fates, Edward (Ted)	0.30	206.55	117,981.00	WO	HD	TR	_____
03/05/24	9544060	Virtually meet with FedEx representatives regarding subpoena and additional search (0.2); Compile bank statements sought by FedEx reflecting FedEx transactions and email correspondence with FedEx representatives regarding such transactions (1.0); Continue preparing follow-up letters to subpoena targets (0.7); Virtually meet with Dropbox's in-house counsel regarding consent form (0.2); Confer with Ted Fates regarding outstanding subpoenas (0.3)	Pham, Matt D.	2.40	1,155.60	119,136.60	WO	HD	TR	_____
03/06/24	9544068	Email correspondence with client regarding additional subpoenas to Chase, Capital One, Comenity Bank, and Navy Federal	Pham, Matt D.	4.90	2,359.35	121,495.95	WO	HD	TR	_____

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Trans Date	Index	Description of Service Rendered (0.3); Update and revise subpoenas to financial institutions (2.6); Continue preparing additional subpoenas to miscellaneous individuals and entities (1.6); Cursory review of document production from FedEx (0.4)	Timekeeper	Hours	Fees	Sum	Circle Action			
03/07/24	9540141	Analyze summary and data on investor tours of Qualcan facility from A. Herren (.5) discuss investigative tasks relating to Garcia, Cruz, Williams and Qualcan with Receiver (.9) discuss issues re: capturing of Qualcan-related social media data with Receiver (.7)	Fates, Edward (Ted)	2.10	1,445.85	122,941.80	WO	HD	TR	_____
03/07/24	9541352	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.60	202.50	123,144.30	WO	HD	TR	_____
03/07/24	9544079	Cursory review of documents provided by Hassan Shareef (0.4); Email correspondence with Dr. Fitzgibbons regarding trial transcripts (0.1); Phone call with Hassan Shareef regarding document production (0.4)	Pham, Matt D.	0.90	433.35	123,577.65	WO	HD	TR	_____
03/08/24	9544105	Confer with Ted Fates regarding American Express document production issue and email correspondence with client regarding same (0.1); Continue preparing additional subpoenas to miscellaneous entities (2.1)	Pham, Matt D.	2.20	1,059.30	124,636.95	WO	HD	TR	_____
03/11/24	9544936	Calls with Receiver and forensic computer consultant re: preservation of social media accounts and data	Fates, Edward (Ted)	0.60	413.10	125,050.05	WO	HD	TR	_____

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03/11/24	9552323	Virtually meet with Stroz team and Ted Fates regarding social media captures (0.5); Email correspondence with client regarding prior document production from Capital One (0.1)	Pham, Matt D.	0.60	288.90	125,338.95	WO	HD	TR
03/12/24	9545782	Attend deposition of Tyler Campbell taken by SEC counsel (1.4) advise on investigative tasks and subpoena response issues (.3)	Fates, Edward (Ted)	1.70	1,170.45	126,509.40	WO	HD	TR
03/12/24	9552333	Email correspondence with Bank of Hawaii representative regarding search for documents (0.2); Email correspondence with Navy Federal Credit Union regarding follow-up request (0.2); Continue preparing additional subpoenas to escrow companies and miscellaneous entities (1.3)	Pham, Matt D.	1.70	818.55	127,327.95	WO	HD	TR
03/13/24	9547160	Call from attorney pursuing claims against Qualcan / Mystic on behalf of investor victim	Fates, Edward (Ted)	0.50	344.25	127,672.20	WO	HD	TR
03/13/24	9552337	Cursory review of documents produced by Fidelity Bank and email correspondence with Fidelity Bank representative regarding missing documents (0.3); Continue preparing additional subpoenas to miscellaneous entities and additional targets from Loretta Cruz's bank statements (0.8)	Pham, Matt D.	1.10	529.65	128,201.85	WO	HD	TR
03/14/24	9548405	Communications with Receiver and A. Herren regarding information and pictures relating to investor tours of Qualcan cannabis facility (.3) review pictures (.2)	Fates, Edward (Ted)	0.50	344.25	128,546.10	WO	HD	TR

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03/14/24	9552346	Phone call with American Express representative regarding subpoenas (0.2); Prepare amended/revised subpoenas to American Express National Bank, American Express Travel Related Services Company, and Comenity Bank/Comenity Capital Bank (0.6); Review and analyze spreadsheet regarding Qualcan tours (0.4)	Pham, Matt D.	1.20	577.80	129,123.90	WO	HD	TR
03/15/24	9549722	Analyze and advise Receiver on investigative issues relating to Murchison law firm	Fates, Edward (Ted)	0.30	206.55	129,330.45	WO	HD	TR
03/15/24	9552360	Email correspondence with American Express and Comenity Bank representatives regarding amended/updated subpoenas	Pham, Matt D.	0.40	192.60	129,523.05	WO	HD	TR
03/18/24	9553092	Analyze subpoenas responses and advise on same, next steps	Fates, Edward (Ted)	0.20	137.70	129,660.75	WO	HD	TR
03/18/24	9559767	Phone call with investor Corey Spector and Krista Freitag regarding investor's interactions with defendants (0.9); cursory review of document productions from Fidelity Bank, One Nevada Credit Union, and PayPal and email correspondence with client regarding same (0.5); Update and finalize subpoenas to 11 miscellaneous entities and individuals (0.8)	Pham, Matt D.	2.20	1,059.30	130,720.05	WO	HD	TR
03/19/24	9554289	Communications with Receiver re: Cruz need to vacate Gracemoor Property by end of month and follow up re: same (.5) communications with counsel for Cruz re: same (.4)	Fates, Edward (Ted)	0.90	619.65	131,339.70	WO	HD	TR

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03/19/24	9559769	Email correspondence with American Express's representative regarding document production issues (0.2); Phone call with counsel for Bruce Mogel estate regarding subpoena to Bank of America (0.2); Review various emails from client regarding additional targets for subpoenas (1.0)	Pham, Matt D.	1.40	674.10	132,013.80	WO	HD	TR	_____
03/20/24	9555219	Advise on investigative tasks, follow up and strategy (.4) advise Receiver on communications with Gracemoor property HOA (.3)	Fates, Edward (Ted)	0.70	481.95	132,495.75	WO	HD	TR	_____
03/20/24	9559790	Phone call with Ferrari of Newport Beach's counsel regarding redactions in production (0.5); Phone calls with Brandon McCredie regarding subpoena to B & J Car Company (0.1); Email correspondence with First Fidelity Bank representative regarding subpoena (0.4); Cursory review of documents produced by B & J Car Company (0.2); Begin preparing additional set of subpoenas to various individuals and entities (0.9)	Pham, Matt D.	2.10	1,011.15	133,506.90	WO	HD	TR	_____
03/21/24	9556936	Advise on outgoing subpoenas for documents and depositions, timing and strategy for depositions of Murchison, Qualcan and Cruz	Fates, Edward (Ted)	0.70	481.95	133,988.85	WO	HD	TR	_____
03/21/24	9559802	Phone call with Dr. Fitzgibbons regarding trial transcripts of litigation involving Bruce Mogel (0.2); Begin drafting additional subpoenas to Dropbox and Ethan Hunt	Pham, Matt D.	4.00	1,926.00	135,914.85	WO	HD	TR	_____

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		(0.6); Review correspondence from CoStar and draft further email correspondence regarding subpoena (0.2); Review and analyze latest document production from Early Warning System (1.0); Review and analyze document productions from FedEx, PayPal, and EWS and continue drafting additional subpoenas to those who received FedEx packages or PayPal/EWS payments (1.6); Confer with Ted Fates regarding updates on subpoenas (0.3); Confer with Jarrod Rickard regarding depositions (0.1)								
03/22/24	9559839	Update and finalize document and deposition subpoenas to Loretta Cruz, Ryan Flanagan, Murchison, and Qualcan (1.0); Prepare next set of subpoenas to miscellaneous individual and entities connected to Qualcan or Bagpipe Holdings payments (2.4); Prepare subpoena to BMI for information on publishers and songwriters connected to Von Ukuf/Mike Garcia (0.6); Email correspondence with Intuit's counsel regarding search update and Intuit email received by OCGM email address (0.3)	Pham, Matt D.	4.30	2,070.45	137,985.30	WO	HD	TR	_____
03/25/24	9561417	Communications with SEC counsel re: deposition of M. Delgado	Fates, Edward (Ted)	0.20	137.70	138,123.00	WO	HD	TR	_____
03/25/24	9569152	Email correspondence with Clear Secure's representative regarding receivership and subpoena (0.2); Email correspondence with Bruce Mogel estate's attorney regarding probate case (0.2); Email correspondence with Chip Farrell from Murchison regarding	Pham, Matt D.	0.50	240.75	138,363.75	WO	HD	TR	_____

04/24/24 18:06:25 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 subpoenas to Ryan Flanagan (0.1)	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/26/24	9562253	Attend SEC deposition of M. Delgado	Fates, Edward (Ted)	2.10	1,445.85	139,809.60	WO	HD	TR
03/26/24	9569187	Phone call with Wells Fargo's representative regarding subpoena (0.1); Email correspondence with Wells Fargo regarding additional account and identifying information requested thereby (0.4); Email correspondence with Wells Fargo regarding missing documents from document production (0.2); Continue preparing follow-up letters to subpoena targets (0.8); Continue preparing additional subpoenas to miscellaneous individuals and entities (1.5)	Pham, Matt D.	3.00	1,444.50	141,254.10	WO	HD	TR
03/27/24	9563462	Advise Receiver on issues relating to forensic computer work (.2) advise on issues re: deposition subpoena issued to L. Cruz (.4) communications with counsel for L. Cruz re: surrender of possession of Gracemoor property (.3)	Fates, Edward (Ted)	0.90	619.65	141,873.75	WO	HD	TR
03/28/24	9564841	Communications with counsel for Hirschmann re: deposition subpoenas and issues re: same (.3) communications with counsel for Cruz re: deliver of keys for Gracemoor property (.3) discuss same with Receiver (.2) advise on meet and confer issues relating to Murchison and Qualcan depositions, service issues for Cruz subpoena (.5)	Fates, Edward (Ted)	1.30	895.05	142,768.80	WO	HD	TR
03/28/24	9569228	Email correspondence with Wells Fargo regarding missing documents (0.2); Phone	Pham, Matt D.	0.70	337.05	143,105.85	WO	HD	TR

04/24/24 18:06:25 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
		call with Chip Farrell from Murchison regarding coordination of Murchison and Flanagan depositions (0.3); Confer with Ted Fates regarding scheduling of Murchison depositions (0.2)						
03/29/24	9567070	Continue prior efforts to develop deposition outlines for Murchison and Flanagan, including by finalizing the elements of likely causes of action (with SoL periods), identifying desired witness admissions, and noting strategic implications (4.1).	Robichaud, James	4.10	1,420.65	144,526.50	WO	HD TR

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	94.70	688.50	65,200.95
001842	Del Castillo, Joshua	0.20	688.50	137.70
002307	Peng, Simona	4.00	337.50	1,350.00
002510	Pham, Matt D.	132.80	481.50	63,943.20
002592	Robichaud, James	40.10	346.50	13,894.65
		271.80		\$144,526.50
Subtotal Fees				\$144,526.50
Discount				0.00
Total Fees				144,526.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

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

04/24/24 18:06:25 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

Account Summary – As Of 04/24/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	369,846.45	369,846.45	0.00	183,948.75	183,948.75	0.00	504,103.95	504,103.95	0.00
Unbilled Adj	1.89	1.89	0.00	0.00	0.00	0.00	3.78	3.78	0.00
Billed	267,478.83	267,478.83	0.00	267,478.83	267,478.83	0.00	267,478.83	267,478.83	0.00
Collected	267,478.83	267,478.83	0.00	267,478.83	267,478.83	0.00	267,478.83	267,478.83	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total	Fees	Costs						
Balance	236,628.90	236,628.90	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

04/24/24 18:06:28 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 393983.00004 Client Name: Krista Freitag, as Receiver for Integrat
 (Ted)
 Date of Last Billing: 04/11/24 Matter Name: Reporting
 Proforma Number: 1270265
 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	
02/12/24	9510238	Work on Receiver's 4th interim report (2.1) discuss same with Receiver (.3) meet and confer communications with SEC counsel (.2) finalize report and exhibit (.3)	Fates, Edward (Ted)	2.90	1,996.65	1,996.65	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.90	688.50	1,996.65
		2.90		\$1,996.65
Subtotal Fees				\$1,996.65
Discount				0.00
Total Fees				1,996.65
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

04/24/24 18:06:28 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

Account Summary – As Of 04/24/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	7,711.20	7,711.20	0.00	1,996.65	1,996.65	0.00	11,153.70	11,153.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	7,022.70	7,022.70	0.00	7,022.70	7,022.70	0.00	7,022.70	7,022.70	0.00
Collected	7,022.70	7,022.70	0.00	7,022.70	7,022.70	0.00	7,022.70	7,022.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	4,131.00	4,131.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

04/24/24 18:06:29 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: 04/11/24 Matter Name: Operations & Asset Sales
 Proforma Number: 1270265
 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	
01/10/24	9473989	Discuss preparations for marketing of Hacienda property and strategy re: same with Receiver	Fates, Edward (Ted)	0.30	206.55	206.55	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.30	688.50	206.55
		0.30		\$206.55
Subtotal Fees				\$206.55
Discount				0.00
Total Fees				206.55
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

04/24/24 18:06:29 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

Account Summary – As Of 04/24/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	11,720.70	11,720.70	0.00	1,944.00	1,944.00	0.00	11,720.70	11,720.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	8,950.50	8,950.50	0.00	8,950.50	8,950.50	0.00	8,950.50	8,950.50	0.00
Collected	8,950.50	8,950.50	0.00	8,950.50	8,950.50	0.00	8,950.50	8,950.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>2,770.20</i>	<i>2,770.20</i>	<i>0.00</i>						
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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

04/24/24 18:06:30 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: 04/11/24 Matter Name: Claims & Distributions
 Proforma Number: 1270265
 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	
01/17/24	9498795	Analyze correspondence from HOA management company for Gracemoor property and notice of lien (.6) work on letter responding to same and re: release of lien (1.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.70	1,858.95	1,858.95	WO	HD	TR
01/18/24	9498801	Prepare written responses to various investor inquiries and correspondence (.4) discuss same with Receiver and A. Herren (.2)	Fates, Edward (Ted)	0.60	413.10	2,272.05	WO	HD	TR
01/22/24	9486522	Assist Receiver in preparing responses to investor inquiries	Fates, Edward (Ted)	0.30	206.55	2,478.60	WO	HD	TR
01/26/24	9492205	Assist Receiver with responses to investor communications	Fates, Edward (Ted)	0.30	206.55	2,685.15	WO	HD	TR
01/29/24	9493597	Discuss revisions to letter to HOA re: lien and attachments to letter with Receiver (.5) work on revisions and finalize letter and exhibits (.7)	Fates, Edward (Ted)	1.20	826.20	3,511.35	WO	HD	TR
02/01/24	9533007	Communications with Receiver and A. Herren re: responses to investor inquiries	Fates, Edward (Ted)	0.30	206.55	3,717.90	WO	HD	TR

04/24/24 18:06:30 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			
02/21/24	9521115	Prepare draft responses to investor inquiries concerning legal issues (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	481.95	4,199.85	WO	HD	TR	_____
03/04/24	9537375	Respond to inquiry from investor re: claims and distributions	Fates, Edward (Ted)	0.30	206.55	4,406.40	WO	HD	TR	_____
03/21/24	9556625	Assist Receiver in preparing case update email to investors and creditors	Fates, Edward (Ted)	0.40	275.40	4,681.80	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	6.80	688.50	4,681.80
		6.80		\$4,681.80
Subtotal Fees				\$4,681.80
Discount				0.00
Total Fees				4,681.80
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 04/24/24

04/24/24 18:06:30 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	18,807.75	18,807.75	0.00	6,058.80	6,058.80	0.00	21,837.15	21,837.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	13,575.15	13,575.15	0.00	13,575.15	13,575.15	0.00	13,575.15	13,575.15	0.00
Collected	13,575.15	13,575.15	0.00	13,575.15	13,575.15	0.00	13,575.15	13,575.15	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	8,262.00	8,262.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

04/24/24 18:06:31 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: 04/11/24 Matter Name: Employment/Fees
 Proforma Number: 1270265
 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	
03/14/24	9548383	Revisions to Receiver's second interim fee application	Fates, Edward (Ted)	0.90	619.65	619.65	WO	HD	TR
03/18/24	9551800	Meet and confer communications with SEC counsel re: second interim fee applications	Fates, Edward (Ted)	0.20	137.70	757.35	WO	HD	TR
03/19/24	9554149	Prepare notice of hearing and proposed order for Receiver's 2nd fee application	Fates, Edward (Ted)	0.30	206.55	963.90	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.40	688.50	963.90
		1.40		\$963.90
Subtotal Fees				\$963.90
Discount				0.00
Total Fees				963.90
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold

04/24/24 18:06:31 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() <u>Transfer All</u>

Billing Instructions

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

Account Summary – As Of 04/24/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,203.20	2,203.20	0.00	963.90	963.90	0.00	2,203.20	2,203.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,032.75	1,032.75	0.00	1,032.75	1,032.75	0.00	1,032.75	1,032.75	0.00
Collected	1,032.75	1,032.75	0.00	1,032.75	1,032.75	0.00	1,032.75	1,032.75	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,170.45	1,170.45	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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