

1 DAVID R. ZARO (BAR NO. 124334)
E-Mail: dzaro@allenmatkins.com
2 MATTHEW D. PHAM (BAR NO. 287704)
E-Mail: mpham@allenmatkins.com
3 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
4 865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
5 Phone: (213) 622-5555
Fax: (213) 620-8816

6 EDWARD G. FATES (BAR NO. 227809)
E-Mail: tfates@allenmatkins.com
7 ALLEN MATKINS LECK GAMBLE
8 MALLORY & NATSIS LLP
One America Plaza
9 600 West Broadway, 27th Floor
San Diego, California 92101-0903
10 Phone: (619) 233-1155
Fax: (619) 233-1158

11 Attorneys for Court-Appointed Receiver
12 KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15
16 SECURITIES AND EXCHANGE
17 COMMISSION,

18 Plaintiff,

19 vs.

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

23 Defendants, and,

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

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

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

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

Relief Defendants.

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

13 **I. BACKGROUND**

14 This equity receivership involves a large, complex, and wide-ranging group
15 of enterprises and assets which are the subject of the Complaint filed by the
16 Securities and Exchange Commission. This quarterly report covers the Receiver's
17 activities during the fourth quarter of 2024, including accounting information from
18 inception of the receivership on May 19, 2023, through December 31, 2024, and
19 also reflects the status of certain assets as of the date of this report, if material
20 activity has occurred between December 31, 2024 and the date of this report.

21 **II. EXECUTIVE SUMMARY**

22 In its Complaint, the Commission alleges that from June 2019 to April 2023,
23 defendants Williams and Hirschman, along with INR, raised approximately
24 \$61.7 million – including over \$22.4 million from November 2022 to April 2023 –
25 from approximately 350 investors nationwide. The Complaint alleges Defendants
26 lied about the existence of, revenue from, and permits associated with INR facilities
27 that supposedly cultivated cannabis in Adelanto, California and Las Vegas, Nevada.
28 The Complaint further alleges that Defendants fraudulently used investor funds to

1 enrich themselves rather than to fund their purported business. To date, no evidence
2 of such cannabis business operations has been found and Defendant Williams has
3 admitted there were none.

4 Upon entry of the TRO, the Receiver and her team worked to review much of
5 the Complaint and evidence submitted by the Commission. The cooperation of the
6 Defendants and Relief Defendants has been very limited, despite repeated requests
7 for meetings and demands for turnover of assets, books and records. Nearly all
8 information, assets, books and records the Receiver recovered or obtained in this
9 case is a result of her and her team's subpoena efforts and very specific inquiries
10 (resulting from the Receiver's review of third-party documentation) that she, through
11 counsel, posed to Defendants and Relief Defendants. In other words, unless the
12 Receiver identified them first and then demanded turnover thereof, assets have not
13 been voluntarily disclosed and/or turned over to the Receiver. Defendant Williams
14 has not responded to any requests for information, while Defendant Hirschmann and
15 Relief Defendants Delgado and Campbell have asserted their Fifth Amendment
16 rights. As it relates to digital records and assets (e.g., websites, emails, company
17 phones/computers, and financial books and records), Defendants and Relief
18 Defendants have provided minimal information. Through her own efforts, the
19 Receiver was able to obtain control over Receivership Entity websites, email
20 accounts (many of which were empty due to deletion) and limited financial
21 information. The data available from these sources is largely incomplete,
22 deleted/destroyed, or otherwise non-existent.

23 With limited cooperation and little to no data turned over, the Receiver,
24 through her counsel, has been forced to issue over 240 subpoenas requesting
25 information from third parties related to the Receivership Entities and their
26 investors; this process involves significant time preparing the subpoenas, following
27 up with subpoena recipients to secure document productions and reviewing the
28 productions received. These efforts have not only provided the Receiver with

1 contact information for hundreds of investors and records critical to the
2 investigation of potential claims against third parties, but also have confirmed the
3 existence of and to date, provided for the Receiver's recovery of the following
4 assets:

- 5 • Over \$8 million in cash (see Receipts and Disbursements below),
- 6 • Fourteen (14) mostly exotic and luxury vehicles,
- 7 • Six (6) real properties, and
- 8 • Various pieces of jewelry and artwork.

9 During the fourth quarter of 2024, the Receiver continued to concentrate
10 efforts on advancing and completing the forensic accounting (report filed on
11 October 31, 2024 (Dkt. 289)), pursuing the sale of the recovered assets (more than
12 \$2.4 million of net proceeds were collected from asset sales), and pursuing and
13 investigating potential claims and recoveries.

14 As discussed herein, the Receiver and her professionals have made significant
15 progress, especially considering the minimal cooperation and very limited organic
16 company data available. However, work remains to be done – notably on
17 investigating and pursuing claims,¹ the recovery/monetization of receivership
18 assets,² and the administration of claims, procedures for which were just approved
19 by the Court (Dkt. No. 335 dated March 13, 2025).

20 **III. SUMMARY OF RECEIVER'S ACTIVITIES**

21 **1. Business Operations**

22 No physical cannabis operations or revenue linked to the Receivership
23 Entitles have been identified. To secure business correspondence, the Receiver
24 updated address records with USPS where allowed, though changes were not
25

26 ¹ On December 1, 2023, the Receiver filed a motion for authority to pursue
27 clawback claims and for approval of proposed procedures (Dkt. 197), which
28 motion was approved on April 9, 2024 (Dkt 218).

² On September 29, 2023, the Receiver filed a motion for authority to sell personal
and real property assets (Dkt. 162), which motion was approved on April 9, 2024
(Dkt 218).

1 permitted for commercial mail receiving agencies like UPS Stores. Additionally,
2 subpoenas, issued through counsel, were issued to electronic and accounting
3 software vendors to recover records. Unfortunately, no substantial books or
4 financial records related to the scheme were produced.

5 **2. Funds Recovered to Date**

6 The Receiver promptly notified each bank and known financial institution
7 identified as having an account associated with the Receivership Entities. Through
8 December 31, 2024, the Receiver recovered over \$8.0 million from bank accounts
9 previously controlled by the defendants, legal retainers, a pre-receivership vehicle
10 deposit, a post-TRO sale of a vehicle owned by Autobahn, and funds withdrawn
11 from accounts by Defendant Hirschmann (which funds were previously unknown to
12 the Commission but discovered by the Receiver). See below in the Receipts and
13 Disbursements section for more detail.

14 The Receiver, through her counsel, also subpoenaed all known financial
15 institutions for all account records, which records were necessary for the Receiver to
16 complete her accounting, as ordered by and as noted above, now filed with the
17 Court.

18 **3. Real Property Assets**

19 As previously discussed, the Receiver confirmed possession of six (6) real
20 properties (all are residential except for one (1) commercial storage unit, and each
21 property is part of a homeowner's association) owned by Autobahn. Pursuant to the
22 aforementioned Order allowing for the marketing and sale of the assets, all real
23 properties were listed by the summer of 2024 and to date, all but one of the
24 properties have sold, with the final sale pending Court approval (Dkt. 326). In some
25 instances, most notably, the property formerly occupied by Defendant Hirschmann,
26 the Receiver had to engage contractors to complete unfinished work at the properties
27 or to prepare the properties for sale. As appropriate, the Receiver either utilized a
28 local property management company, relied on the listing agent to provide local

1 support, or a combination of the two to ensure that the properties were maintained.
2 As the property sales have closed, carrying costs for the estate have been
3 continuously reduced.

4 During the third quarter 2024, the Receiver requested and was granted
5 authority to sell two townhomes (“Riverpark” and “Sultana”). (Dkt. 279). On
6 November 7, 2024, the Court also approved the sale of two single family residences
7 (Dkt. 290) – the Gracemoor and Hacienda Properties, which sales have closed. On
8 February 13, 2025, the Court approved the sale of the Summersweet storage
9 condominium (Dkt. 319), which sale has also now closed. Thus, the Receiver
10 remains in possession of one real property, a luxury condo (“Isle of Venice”). It
11 should be noted that the Hacienda and Summersweet properties included
12 overbidders who collectively, materially improved the sale prices of the assets.
13 Additionally, the Receiver used the 2024 National Association of Realtors (“NAR”)
14 settlement as the basis to negotiate highly reduced commissions on all the residential
15 properties. Commercial properties are not a part of the NAR settlement, however
16 the proposed broker commission for Summersweet is within industry standards.
17 The remaining real property sale is expected to close in late March-early April 2025.

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

19 In addition to the real property, the Receiver noted dozens of vehicle
20 purchases by Receivership Entities or with funds raised from investors. To date, the
21 Receiver identified 13 vehicles owned by Autobahn, all but one were recovered
22 from Defendant Hirschman. Almost immediately after the TRO was entered on
23 May 19, 2023, Hirschmann sold a Maserati automobile for \$170,000 cash (about
24 half of what Autobahn had purchased it for six months earlier). The Receiver was
25 able to recover \$170,000, which Hirschmann had instructed the buyer to wire to a
26 criminal defense law firm. Further recovery from the fraudulent transfer of the
27 Maserati resulted in the collection of an additional \$42,000 from the dealer that sold
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1 the vehicle to an unrelated third party in what appears to be an arms-length
2 transaction.

3 The Receiver is also aware of numerous vehicles owned by Defendants or
4 Relief Defendants. Relief Defendant Campbell turned over two (2) vehicles. A
5 third vehicle, a Ford Mustang, remains in Relief Defendant Campbell's possession.
6 The vehicle is believed to have no net value due to an existing loan secured by the
7 vehicle.

8 As discussed in prior reports, the Receiver has been holding all recovered
9 vehicles in a secured storage facility in Southern California. The facility regularly
10 maintains the vehicles' batteries to ensure that they remain in running condition.
11 Occasionally, some vehicles have required service. As these are luxury and exotic
12 vehicles, even something as common place as an oil change is orders of magnitude
13 more expensive than a typical consumer vehicle. These repairs and maintenance are
14 necessary to preserve the value of the vehicles for sale.

15 As previously discussed, the Receiver signed a listing agreement with a
16 reputable asset disposition firm and marketing of the vehicles is ongoing. To date,
17 ten (10) vehicles have sold; net sale proceeds for eight (8) of them are reflected in
18 the receipts and disbursements through December 31, 2024 below. Two (2) of the
19 vehicles' net sale proceeds were received in March 2025 and the remaining four (4)
20 vehicles are the exotic and higher end luxury vehicles. Offers continue to come in,
21 are negotiated, and the pricing for the vehicles is regularly adjusted to reflect current
22 market values.

23 Also, the Receiver identified hundreds of thousands of dollars of jewelry
24 purchases. Approximately thirteen (13) jewelry pieces have been recovered and
25 secured in a safe deposit box at a Southern California bank vault. The Receiver is
26 likewise pursuing avenues to sell the jewelry. Unfortunately, it does not appear that
27 selling the jewelry will be as efficient as selling the real property and vehicles, due
28 to the highly subjective nature of the value of each item. The net recoveries may be

1 lower as well in relation to funds expended to purchase the items. Individual tastes
2 and preferences will highly influence the marketability for these items and will
3 require an individual approach to each sale. As noted before, prospective
4 consignment sellers and auctioneers have also expressed a softening market for such
5 items (and personal property items are subject to high retail mark-ups when
6 purchased). The Receiver commissioned an appraisal for each of the jewelry pieces
7 in her possession. The appraisals provide some guidance on the respective market
8 value for each piece.

9 Finally, four large metal art sculptures³ weighing hundreds of pounds were
10 located in the Boise area. After contacting the retailer that sold the sculptures to
11 Defendant Hirschmann, the buy-back value for all pieces was conveyed to be \$6,500
12 (net of costs of retrieving and transporting same from Idaho back to Las Vegas). As
13 a result of an unwillingness by auctioneers or art dealers to take on the sale of these
14 sculptures, the Receiver proceeded to transact with the original retailer to prevent
15 the interference of these assets in the sale of the Hacienda Property. Efforts to
16 identify, locate and recover additional jewelry, luxury goods, artwork and other
17 valuable personal property are ongoing. The Receiver attempted to recover another
18 undisclosed valuable piece of art from Defendant Hirschmann, which the Receiver
19 discovered was purchased by Oceans 19. Defendant Hirschmann, however, claims
20 that the piece was destroyed while moving from the Hacienda property and that it
21 was thrown in the trash. Hirschmann was unable to provide a photograph of the
22 damage to the painting, nor did he even notify the Receiver that the painting existed
23 or was damaged. Attached as **Exhibit A** is a schedule detailing the assets collected
24 to date, including real property, automobiles, jewelry and artwork along with notes
25 on their present status.

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28 ³ The pieces are over 6 foot tall metal statues of Egyptian gods Horus and Anubis, a
medieval knight and a full sized replica of an Italian sports car.

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

2 The Receiver maintains general liability and property insurance over the
3 presently held real property. It should be noted that the insurance marketplace
4 appears to be a general state of transition, and that carriers are increasingly
5 unwilling to renew policies, or make changes that were typical to the industry in
6 certain markets highly susceptible to climate change. Thus far, the Receiver has
7 been able to maintain effective policies over these assets. The Receiver previously
8 reorganized coverage on the vehicles in her possession to obtain quality coverage
9 that considered the lack of daily driving on the vehicles. As assets are sold, they
10 have been and will be removed from insurance coverage.

11 Coverage for the jewelry was previously placed, however, after determining
12 that the jewelry would not be worn daily or held in a home environment, the carrier
13 withdrew the coverage. The recent appraisals included an insurance value for each
14 item, so appropriate coverage will be bound prior to transporting the items from the
15 bank vault.

16 **6. Other Investments and Loans**

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

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

1 operations over to the Receiver. An experienced Amazon.com operations team was
2 operating the virtual storefront, along with existing product, which consisted of
3 various health/exercise supplements. The Receiver worked with the operations team
4 and continued to gather information regarding the business to support its operations
5 (from manufacturing of product inventory to warehouse inventory to insurance).
6 Unfortunately, the prior net losses reported, the limited revenue activity and
7 complete lack of cooperation by the manufacturer of the supplements has led to a
8 wind down of operations. The Receiver also did discover that the intellectual
9 property associated with the business (e.g., the trademark) had lapsed and was not
10 recoverable by the Receiver (the window had passed prior to the Receiver’s
11 appointment).

12 **7. Digital Records**

13 With limited cooperation from the Defendants and Relief Defendants, the
14 Receiver has worked to identify payments linked to the Receivership Entities and
15 secure their business records. Subpoenas were issued to key vendors, including
16 internet service providers and website hosts, requiring them to preserve all relevant
17 documents. Initially, the Receiver took control of six (6) primary domains and nine
18 (9) add-on domains, later expanding to 47 domains. However, 34 domains were
19 “parked” or did not have a website or email account associated with them.
20 Hirschmann, through counsel, disputed the inclusion of certain domains under the PI
21 Order. Gaining control of the domains allowed the Receiver to archive websites and
22 redirect traffic to www.INRreceivership.com. To preserve assets, the Receiver has
23 maintained domain renewals while transitioning parked domains to a lower-cost
24 option.

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1 In addition to website traffic, the domains are also capable of having
2 associated email accounts, e.g. user@inr.green or user@ocgm.com. The Receiver
3 noted various instances of the Defendants or Relief Defendants using those email
4 accounts prior to the Receiver’s takeover (e.g. max@ocgm.com,
5 max.bergmann@inr.green, max@xjus.com or aia.montgomery@inr.green), however
6 upon taking control of those domains, the Receiver noted that almost no emails
7 existed in the accounts. Furthermore, the Receiver discovered that certain of the
8 receivership entity accounts were deleted and has been able to trace those deletion
9 efforts to the IP address associated with the Defendant Hirschmann occupied
10 Hacienda property shortly after the TRO was entered.

11 Finally, the Receiver also worked to identify payments to accounting
12 software, customer relationship manager (CRM) entities, or similar types of
13 programs. Only one such vendor was identified and a subpoena for records was
14 issued. While the Receiver was able to glean certain information from the resulting
15 production, limited transactional level detail existed in the account produced to the
16 Receiver. As a result, no useful accounting or investor transactional information can
17 be derived from this production.

18 **8. Receipts and Disbursements**

19 The following reflects the cash activity of the receivership estate for the
20 period from May 19, 2023, through December 31, 2024. A summary of the receipts
21 and disbursements is as follows:

Total Bank Account Balances at takeover	\$6,541,700
Hirschmann Withdrawal Recovery	\$1,128,921
Legal Retainer Recovery	\$376,086
Maserati Settlement Recovery	\$42,000
Vehicle Deposit Recovery	\$30,000

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Interest Income	\$315,270
Parking Lease Income	\$500
Raw Sports Net Operating Revenue	\$48,715
Personal Property Sale Proceeds (Art and Jewelry)	\$6,500
Sultana Property Net Sale Proceeds	\$688,732
River Park Net Sale Proceeds	\$632,867
Hacienda Net Sale Proceeds ⁵	\$1,100,432
Gracemoor Net Sale Proceeds	\$1,007,060
Vehicle Sale Net Sale Proceeds	\$701,500
TOTAL RECEIPTS	\$12,620,283
Raw Sports Operating Expenses	(\$43,452)
Real Property Related Expenses (e.g., HOA monthly dues, property taxes, insurance)	(\$243,847)
Vehicle Expenses (e.g., repossession, transportation, security, storage, insurance)	(\$222,753)
General Receivership Expenses (primarily includes asset search related expenses)	(\$61,532)
Receiver Fees and Expenses	(\$735,660)
Receivership Legal Fees and Expenses	(\$595,450)
TOTAL DISBURSEMENTS	(\$1,902,694)

⁵ This does not include a \$526,000 holdback intended to address a Small Business Administration lien related to Hirschmann, personally, which is to be resolved one way or another by mid-May 2025.

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CASH BALANCE AT DECEMBER 31, 2024	\$10,717,589
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As of December 31, 2024, outstanding checks totaled \$4,657, thus the actual bank balance as of December 31, 2024, was \$10,712,932. Subsequent to December 31, 2024, the Summersweet property and two vehicles' net sale proceeds have been received.

9. Investor Communications

Upon entry of the TRO, the Receiver promptly established a dedicated web page with a link to same on the Receiver's company's website which is used to provide case information, regular updates, and answers to frequently asked questions to investors. The Internet address for the webpage is www.INRreceivership.com. The Receiver is also maintaining a dedicated e-mail address and telephone line for all inquiries.

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

1 On February 4, 2025, the Receiver filed her Motion for Order: 1) Approving
2 Procedures for the Administration of Claims against the Receivership Estate, 2)
3 Setting Claims Bar Date; and 3) Approving Claims Bar Date Notice and Proof of
4 Claim Forms (Dkt. No. 307), which motion was approved by the Court on March
5 13, 2025 (Dkt. No. 335). Pursuant to the Court's order, the Receiver is now in the
6 process of preparing to send out prepopulated claim forms to prospective claimants
7 on or before April 21, 2025. After the claims process is completed, the Receiver will
8 seek authority to begin distributions to investors and creditors with approved claims.
9 This distribution process is expected to take time to complete due to ongoing
10 recovery efforts discussed above.

11 **10. Forensic Accounting**

12 During the fourth quarter of 2024, the Receiver and her team completed the
13 Court-ordered forensic accounting, the report on which was filed on October 31,
14 2024 (Dkt. 289). Notably, the Receiver did not find transactions incurred by the
15 Receivership Entities which are associated with revenue generating cannabis
16 operations, but did find *material* amounts of credit card payments, payments to
17 numerous (unexplained) non-investor individuals and entities (mentioned above),
18 payments to investors, cash withdrawals, real and personal property purchases
19 (discussed above), real property renovation/improvement related expenses, and
20 other personal affect-type transactions. The forensic accounting efforts have been
21 critical in assisting with the ongoing investigation of potential third-party claims and
22 recoveries. It is also critically serving as the foundation for the claims and
23 ultimately the distribution process.

24 Given that no accounting system or data for the companies was located or
25 turned over by any of the Defendants or Relief Defendants, the Receiver, through
26 her counsel, has issued numerous subpoenas to gather banking records (as discussed
27 above) and is using a project-specific and cost-effective AI software to upload the
28 tens of thousands of banking transactions into a database. This software saved

1 considerable time and expense and shortened the time required to complete the
2 accounting, which in some complex cases can take years (depending on the number
3 of bank accounts and volume of transactions).

4 **IV. PRELIMINARY RECOMMENDATIONS**

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

8 **1. Document Recovery Efforts**

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

13 **2. Receivership Asset Recovery Efforts and Investigation**

14 As appropriate, the Receiver will seek to locate any presently unaccounted for
15 receivership assets that may exist. As part of her investigation, the Receiver is and
16 will continue to evaluate claims to pursue recovery of assets of the Receivership
17 Entities from third parties. With the exception of clawback claims, which the Court
18 has already authorized, the Receiver will seek Court approval to pursue any such
19 claims.

20 **3. Accounting**

21 As previously noted, the Receiver has filed her forensic accounting report,
22 which will help, among other things, identify assets not already identified, identify
23 potential clawbacks and other recoverable claims, and identify investors and the
24 money in-money out account balances associated with each of them.

25 **V. CONCLUSION**

26 Based upon the Receiver's preliminary investigation and findings, the
27 Receiver recommends and requests that the Court order the Receiver to continue her
28 work pursuant to the orders issued by the Court. The Receiver also requests the

1 Court authorize her continuing investigation and approve this eighth report and
2 recommendations.

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4 Dated: March 18, 2025

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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By: /s/Edward G. Fates

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

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EXHIBIT A

Exhibit A - Schedule of Assets

Real Property Assets:

	Address	City	State	Description	Notes
1	865 E. Riverpark	Boise	ID	Attached Townhome	Sale approved and closed.
2	9641 Sultana	Garden City	ID	Attached Townhome	Sale approved and closed.
3	5963 N. Hacienda	Boise	ID	Single Family Residence	Sale approved and closed.
4	7691 Gracemoor	Las Vegas	NV	Single Family Residence	Sale approved and closed.
5	2158 Summersweet	Boise	ID	Commerical Condominium Storage Unit	Sale approved and closed.
6	21 Isle of Venice	Fort Lauderdale	FL	Condominium	Sale approved and pending closing.

Personal Property - Autos:

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

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

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