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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

**SEVENTH 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: June 20, 2025  
Time: 9:00 a.m.  
Ctrm: 9D  
Judge: Hon. John W. Holcomb

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

8  
9 Relief Defendants.  
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1 Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”),  
2 general counsel to Krista L. Freitag (the “Receiver”), the Court-appointed receiver  
3 for Defendant Integrated National Resources, Inc., dba Weedgenics (“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 Seventh Interim Application for Payment of Fees and Reimbursement  
11 of Expenses (the “Application”). This Application covers the period from  
12 October 1, 2024 through December 31, 2024 (the “Application Period”), and seeks  
13 approval of \$80,786.71 in fees and \$11,702.62 in expenses, and an order authorizing  
14 the Receiver to pay, on an interim basis, 80% of the fees incurred (\$64,629.37) and  
15 100% of the expenses incurred (\$11,702.62).

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 (“Commission”). The Receiver was appointed on a temporary basis by  
21 the Temporary Restraining Order entered on May 19, 2023 (“TRO”), and on a  
22 permanent basis on June 2, 2023, pursuant to the Preliminary Injunction Order with  
23 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

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

This Application seeks approval of \$80,786.71 in fees for a total of 144.30 hours worked, and payment on an interim basis of 80% of that amount, or \$64,629.37. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**<sup>1</sup> and is broken down into the following categories:

Category	Hours	Amount
General Receivership	4.50	\$3,098.25
Asset Investigation & Recovery	114.50	\$60,475.95
Reporting	2.20	\$1,514.70
Operations & Asset Sales	13.00	\$8,950.50

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

Claims & Distributions	7.30	\$5,026.05
Third Party Recoveries	1.10	\$757.36
Employment/Fees	1.40	\$963.90
<b>Total Fees</b>	<b>144.00</b>	<b>\$80,786.71</b>

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 issues relating to (a) the consents to entry of judgments as to the Receivership Entities that the Receiver signed and the SEC filed, (b) the dismissal of Relief Defendant Eric Francom from the case, and (c) discussions about a potential settlement involving Relief Defendant Alexandria Montgomery. The firm also analyzed and advised the Receiver regarding the Corporate Transparency Act filing requirements for the Receivership Entities, and handled communications with counsel for the parties regarding information needed for such filings. The reasonable and necessary fees for Allen Matkins' work in this category total \$3,098.25.

#### **2. Asset Investigation & Recovery.**

The substantial services in this category relate generally to efforts to investigate, identify, secure, preserve, and recover Receivership Entity assets.

1 Investigation-related tasks comprised the largest category of Allen Matkins' work  
2 during the Application Period. The tasks performed include the following:

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

23 Allen Matkins devoted considerable time to gathering and analyzing  
24 documents from third parties and interviewing witnesses for the purpose of  
25 evaluating potential claims to recover funds on behalf of the receivership estate.  
26 The investigation and analysis has focused on, among other things, tours given by  
27 Defendant Hirschmann to prospective investors in the Ponzi scheme at a cannabis  
28 facility located in Las Vegas (not owned or operated by the Defendants or Relief

1 Defendants) and the circumstances in which those tours were allowed to take place.  
2 These tours were critical to the growth of the Ponzi scheme (investors saw the  
3 facility first hand and were lead to believe it was owned and operated by INR) and  
4 have taken time to investigative due to the systematic destruction of emails and text  
5 messages by persons associated with the scheme and the fact that the owner of the  
6 cannabis facility has, thus far, denied having any contact with Hirschmann or any  
7 other persons associated with the scheme.

8 The investigation has also focused on the law firms that represented INR and  
9 assisted the Defendants and Relief Defendants who were operating the Ponzi  
10 scheme. Allen Matkins' investigative work also included interviewing various  
11 witnesses, as well as planning and taking depositions that took place in August and  
12 September 2024 (with additional depositions taking place in the fourth quarter of  
13 2024 and first quarter of 2025).

14 Through these efforts, along with her forensic accounting, the Receiver has  
15 identified various third parties against whom she plans to pursue claims (including  
16 fraudulent transfer claims, aiding and abetting claims, and others) to recover funds  
17 for distribution to investors with losses from the Ponzi scheme. The Court has  
18 authorized the Receiver to pursue fraudulent transfer claims and to settle such  
19 claims within certain pre-approved parameters. Dkt. 218. The Receiver has already  
20 successfully settled two such claims without litigation.

21 Allen Matkins also assisted the Receiver in addressing issues with the  
22 Gracemoor Property, including (a) a claim by the homeowners' association  
23 ("HOA") that certain construction at the property was not approved by the HOA,  
24 and (b) a lien recorded against the property by a vendor of security screens that was  
25 not fully paid for a pre-receivership purchase order.

26 The reasonable and necessary fees for Allen Matkins' work in this category  
27 total \$60,475.95.

28

1                   **3. Reporting.**

2           Allen Matkins' services in this category were focused on preparing the  
3 Receiver's Seventh Interim Report and Recommendations, which was filed on  
4 November 19, 2024. Dkt. 293. The reasonable and necessary fees for Allen  
5 Matkins' work in this category total \$1,514.70.

6                   **4. Operations & Asset Sales.**

7           Allen Matkins' services in this category were focused on sales of receivership  
8 assets, including real properties and automobiles. The firm assisted the Receiver in  
9 preparing motions for approval of sales of the Riverpark, Sultana, Hacienda and  
10 Gracemoor properties, which motions were granted by the Court. In the case of the  
11 Hacienda property, an overbid was received, an auction held and the sale was  
12 ultimately approved to the highest bidder at the auction (with the purchase price  
13 having increased by \$150,000 as a result of the auction). The firm also advised on  
14 issues relating to the sales of automobiles and the potential sale of the remaining  
15 Rari Nutrition assets. The reasonable and necessary fees for Allen Matkins' work in  
16 this category total \$8,950.50.

17                   **5. Claims & Distributions.**

18           Services rendered in this category generally relate to the claims and interests  
19 of investors and creditors of the Receivership Entities. Allen Matkins assisted with  
20 issues related to disseminating information about the receivership to investor and  
21 creditors, including notification letters, and information provided on the receivership  
22 website ([www.inreceivership.com](http://www.inreceivership.com)). The firm also assisted in responding to direct  
23 inquiries from investors and creditors. The reasonable and necessary fees for Allen  
24 Matkins' work in this category total \$5,026.05.

25                   **6. Third Party Recoveries**

26           Allen Matkins' work in this category focused on pursuing and settling two  
27 clawback claims (once such claims had been authorized by the Court), which  
28 produced a recovery of \$94,000 (part of which is being paid over time in

installments). The reasonable and necessary fees for Allen Matkins' work in this category total \$757.36.

**7. Employment/Fees.**

Neither the Receiver nor Allen Matkins charge for preparing their own detailed fee applications. Allen Matkins assisted in preparing the Receiver's seventh interim fee application and in meeting and conferring with counsel for the Securities and Exchange Commission before the seventh interim fee applications were filed. The reasonable and necessary fees for Allen Matkins' work in this category total \$963.90.

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

Allen Matkins requests that the Court approve reimbursement of \$11,702.62 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category. The majority of the expenses incurred relate to the issuance and service of subpoenas. As explained above, Allen Matkins issued subpoenas and gathered documents from many third parties and financial institutions. Each of these subpoenas required proper service.

The total for costs incurred by Allen Matkins during the Application Period is \$11,702.62 and is broken down by category as follows:

Category	Total
E-Discovery	\$552.00
Court Reporter Costs for Depositions	\$11,115.88
Research (including PACER)	\$34.74
<b>Total Fees</b>	<b>\$11,702.62</b>

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

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).

1 These expenses include the fees and expenses of this Receiver and her professionals,  
2 including Allen Matkins. Decisions regarding the timing and amount of an award of  
3 fees and costs to the Receiver and her professionals are committed to the sound  
4 discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)  
5 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

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

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

28

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

8 Allen Matkins has submitted a detailed fee application which describes the  
9 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to  
10 staff matters as efficiently as possible while remaining cognizant of the complexity  
11 of issues presented. As noted above, the request for fees is based on Allen Matkins'  
12 customary billing rates charged for comparable services provided in other matters,  
13 less a 10% discount.

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

#### 24 **IV. CONCLUSION.**

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

- 26 1. Approving Allen Matkins' fees of \$80,786.71;
- 27 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
28 \$64,629.37, from the assets of the Receivership Entities;



# EXHIBIT A

05/20/25 16:50:55 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: 04/29/25 Matter Name: General Receivership  
Proforma Number: 1337787  
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			
10/04/24	9794299	Communications with E. Francom regarding Corporate Transparency Act information needed	Fates, Edward (Ted)	0.20	137.70	137.70	WO	HD	TR	_____
10/07/24	9796713	Communications with E. Francom and counsel for E. Francom re: Corporate Transparency Act and related issues	Fates, Edward (Ted)	0.40	275.40	413.10	WO	HD	TR	_____
10/09/24	9800700	Respond to communications from M. Delgado regarding forensic accounting	Fates, Edward (Ted)	0.20	137.70	550.80	WO	HD	TR	_____
10/14/24	9804158	Communications with Receiver and E. Francom regarding information for Corporate Transparency Act filing	Fates, Edward (Ted)	0.20	137.70	688.50	WO	HD	TR	_____
11/11/24	9842975	Review stipulation regarding briefing schedule for SEC remedies motion (.1) communications with counsel for parties re: same (.1)	Fates, Edward (Ted)	0.20	137.70	826.20	WO	HD	TR	_____
11/13/24	9844426	Communications with SEC counsel and Receiver regarding accounting and disgorgement calculations for remedies motion (.8) discuss Corporate Transparency Act filing requirements	Fates, Edward (Ted)	1.10	757.35	1,583.55	WO	HD	TR	_____

05/20/25 16:50:55 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 Receiver (.3)	Timekeeper	Hours	Fees	Sum	Circle Action			
11/14/24	9845987	Calls with Receiver and SEC counsel to discuss accounting related to SEC remedies motion and potential disgorgement amounts	Fates, Edward (Ted)	0.70	481.95	2,065.50	WO	HD	TR	_____
11/22/24	9856785	Discuss issues regarding frozen account balances and SEC disgorgement motion with Receiver	Fates, Edward (Ted)	0.40	275.40	2,340.90	WO	HD	TR	_____
12/04/24	9870415	Advise Receiver on court decision enjoining enforcement of Corporate Transparency Act	Fates, Edward (Ted)	0.20	137.70	2,478.60	WO	HD	TR	_____
12/20/24	9889628	Analyze proposed consents to final judgment and proposed final judgments against receivership entities from SEC counsel (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	619.65	3,098.25	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt				
10/01/24	2906579	DEPO – Lexitas - Deposition Transcript of John Ryan Flanagan Vol: II Taken on 09/11/2024	0.00	4,471.68	WO	HD	TR	_____
10/01/24	2909683	DSCRCH – LexisNexis - 5101 Mountain Foliage Las Vegas NV 8148 Blue Devil S137313664209	0.00	34.74	WO	HD	TR	_____
10/02/24	2906580	DEPO – Lexitas -	0.00	5,494.75	WO	HD	TR	_____
10/31/24	2908656	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for 10/2024	0.00	276.00	WO	HD	TR	_____
11/30/24	2913561	EDISC – Sandline Discovery LLC - Everlaw eDiscovery	0.00	276.00	WO	HD	TR	_____

05/20/25 16:50:55 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				
12/10/24	2916330	technology and services for 11/2024 DEPO – Lexitas - Deposition Transcript of John Ryan Flanagan Vol: I Taken on 12/05/2024	0.00	1,149.45	WO	HD	TR	_____
12/31/24	2919067	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for December 2024	0.00	276.00	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.50	688.50	3,098.25
		4.50		\$3,098.25
Subtotal Fees				\$3,098.25
Discount				0.00
Total Fees				3,098.25
Total Disbursements				11,978.62

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 05/20/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	17,330.75	16,350.75	980.00	10,559.05	6,568.20	3,990.85	197,892.28	93,823.65	104,068.63
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,942.40	1,926.00	16.40
Billed	81,724.50	42,898.95	38,825.55	49,881.63	24,171.75	25,709.88	84,157.20	84,157.20	88,099.16
Collected	81,724.50	42,898.95	38,825.55	49,881.63	24,171.75	25,709.88	172,256.36	84,157.20	88,099.16

05/20/25 16:50:55 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>25,635.92</b>	<b>9,666.45</b>	<b>15,969.47</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

---

**Billing Address**

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

---

05/20/25 16:50:55 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 393983.00003      Client Name: Krista Freitag, as Receiver for Integrat  
(Ted)  
Date of Last Billing: 04/29/25      Matter Name: Asset Investigation & Recovery  
Proforma Number: 1337787  
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	
10/01/24	9791480	Communications with counsel for J. Konikow (.2) advise on next steps re: same (.1)	Fates, Edward (Ted)	0.30	206.55	206.55	WO	HD	TR
10/01/24	9797195	Prepare subpoenas to Greg Cosio	Pham, Matt D.	0.60	288.90	495.45	WO	HD	TR
10/02/24	9792280	Communications with counsel for J. Konikow (.3) advise on next steps relating to Roacho, Konikow and Cosio (.4)	Fates, Edward (Ted)	0.70	481.95	977.40	WO	HD	TR
10/02/24	9797199	Confer with Ted Fates regarding outstanding subpoenas (0.3); Phone calls and email correspondence with Justin Konikow regarding contact with Greg Cosio and document production (0.3); Begin preparing additional subpoenas to miscellaneous individuals (1.0)	Pham, Matt D.	1.60	770.40	1,747.80	WO	HD	TR
10/03/24	9797206	Cursory review of document production from Navy Federal Credit Union (0.2)Phone call with Qualcan's counsel	Pham, Matt D.	3.40	1,637.10	3,384.90	WO	HD	TR

05/20/25 16:50:55 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			
		regarding additional depositions (0.1); Phone call with American First Credit Union regarding follow-up request for documents (0.1); Begin reviewing and analyzing supplemental document production from Ryan Flanagan (2.8); Email correspondence and phone call with Flanagan's counsel regarding missing documents from production (0.2)								
10/04/24	9794734	Analyze investigator report re: O. Cortese (.2) discuss same with Receiver (.2) discuss investigative steps re: J. Antell with Receiver (.3)	Fates, Edward (Ted)	0.70	481.95	3,866.85	WO	HD	TR	_____
10/04/24	9797214	Continue reviewing and analyzing documents produced by Ryan Flanagan and update outline for Flanagan deposition	Pham, Matt D.	4.70	2,263.05	6,129.90	WO	HD	TR	_____
10/07/24	9805553	Email correspondence with client and then with Navy Federal regarding outstanding document production	Pham, Matt D.	0.20	96.30	6,226.20	WO	HD	TR	_____
10/08/24	9805555	Review previously issued subpoenas and previously received document productions for data to be included in Receiver's forensic accounting report (0.7); Review and analyze documents from Flanagan's document production (0.8)	Pham, Matt D.	1.50	722.25	6,948.45	WO	HD	TR	_____
10/09/24	9800817	Advise on investigative steps, strategy and issues relating to Qualcan, Barracco, Roacho, Murchison, and Flanagan (.8) communications with	Fates, Edward (Ted)	1.10	757.35	7,705.80	WO	HD	TR	_____

05/20/25 16:50:55 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			
		Receiver re: same (.3)								
10/09/24	9805578	Phone call with Roacho's counsel regarding rescheduling deposition (0.1); Confer with Ted Fates regarding outstanding issues relating to depositions and subpoenas (0.7); Continue preparing for continued deposition of Ryan Flanagan (1.4)	Pham, Matt D.	2.20	1,059.30	8,765.10	WO	HD	TR	_____
10/10/24	9800869	Communications with Fennnemore law firm regarding payments received from receivership entities (.3) advise on Roacho deposition issues (.3)	Fates, Edward (Ted)	0.60	413.10	9,178.20	WO	HD	TR	_____
10/10/24	9805586	Phone call with Flanagan's counsel regarding document production issues	Pham, Matt D.	0.30	144.45	9,322.65	WO	HD	TR	_____
10/11/24	9801985	Analyze call/text data from Receiver relating to Flanagan. Garcia, Montgomery and Everage (.3) discuss same and Roacho scheduling issues with Receiver (.2)	Fates, Edward (Ted)	0.50	344.25	9,666.90	WO	HD	TR	_____
10/14/24	9813679	Email correspondence with Roacho's counsel regarding vendors for text message extraction (0.1); Email correspondence with Flanagan's counsel and Murchison's counsel regarding postponement of Flanagan deposition (0.1); Phone call with Flanagan's counsel regarding update on rescheduling deposition and document production issues (0.3)	Pham, Matt D.	0.50	240.75	9,907.65	WO	HD	TR	_____

05/20/25 16:50:55 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	
10/16/24	9808058	Discuss preparation of forensic accounting report with Receiver	Fates, Edward (Ted)	0.30	206.55	10,114.20	WO	HD	TR
10/16/24	9813707	Email correspondence with Alanna Bondy regarding Amorosi settlement agreement	Pham, Matt D.	0.20	96.30	10,210.50	WO	HD	TR
10/17/24	9808700	Analyze and advise Receiver on structure and approach for forensic accounting report	Fates, Edward (Ted)	1.80	1,239.30	11,449.80	WO	HD	TR
10/17/24	9813727	Phone call with Bank of America representative regarding status of outstanding document production (0.1); Phone call with Roacho's counsel regarding Roacho's retention of new, additional counsel and scheduling of deposition (0.1); Phone call with Flanagan's counsel regarding outstanding issues with Flanagan's deposition (0.1)	Pham, Matt D.	0.30	144.45	11,594.25	WO	HD	TR
10/17/24	9831088	Continue reviewing document production from Murchison (1.3); Continue reviewing document productions from Flanagan (1.1)	Pham, Matt D.	2.40	1,155.60	12,749.85	WO	HD	TR
10/18/24	9810195	Work on drafting and revising Receiver's forensic accounting report (2.4) discuss same with Receiver (1.3) advise on investigative tasks relating to Murchison firm and scheduling of Flanagan and Qualcan-related depositions (.5)	Fates, Edward (Ted)	4.20	2,891.70	15,641.55	WO	HD	TR
10/18/24	9813752	Email correspondence with Scott Rasmussen regarding scheduling of	Pham, Matt D.	1.20	577.80	16,219.35	WO	HD	TR

05/20/25 16:50:55 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			
		Zoom meeting (0.3); Draft correspondence to Greg Cosio regarding follow-up interview relating to Qualcan (0.2); Phone call with Flanagan's counsel regarding proposed deposition dates (0.1); Confer with Ted Fates regarding status of scheduling outstanding depositions and related issues (0.3); Email correspondence with client regarding scheduling of outstanding depositions (0.3)								
10/21/24	9814106	Work on revisions to forensic accounting report (1.1) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.50	1,032.75	17,252.10	WO	HD	TR	_____
10/22/24	9815041	Work on revisions to Receiver's forensic accounting report, analysis of accounting tables and exhibits (1.1) discuss same with Receiver (1.6) communications with Receiver and counsel re: scheduling of depositions and timing of related document productions (.4)	Fates, Edward (Ted)	3.10	2,134.35	19,386.45	WO	HD	TR	_____
10/22/24	9821700	Phone call with Scott Rasmussen regarding scheduling informal interview and email correspondence with client regarding same	Pham, Matt D.	0.20	96.30	19,482.75	WO	HD	TR	_____
10/23/24	9816224	Discuss revisions to forensic accounting report with Receiver and communications with SEC counsel re: same	Fates, Edward (Ted)	0.70	481.95	19,964.70	WO	HD	TR	_____
10/23/24	9821714	Phone call with Eric Fogel regarding available dates for depositions and email	Pham, Matt D.	0.20	96.30	20,061.00	WO	HD	TR	_____

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		correspondence with Phil Trenchak regarding same								
10/24/24	9818707	Meeting with Receiver and attorney S. Rasmussen regarding pre-receivership work for INR while at Murchison firm (1.7) analyze and advise on strategy and next steps regarding facts supporting claims against Murchison (.6) discuss SEC meet and confer regarding forensic accounting report with Receiver (.4)	Fates, Edward (Ted)	2.70	1,858.95	21,919.95	WO	HD	TR	_____
10/24/24	9821722	Prepare outline for informational interview with Scott Rasmussen (0.8); Virtually interview Scott Rasmussen regarding his tenure at Murchison & Cumming and involvement on INR matters (1.7); Confer with Ted Fates regarding Scott Rasmussen's responses to questions and potential issues and strategies relating to claims against Murchison (0.8); Phone call with Roacho's counsel regarding status of document production (0.1)	Pham, Matt D.	3.40	1,637.10	23,557.05	WO	HD	TR	_____
10/25/24	9819149	Call with Receiver and SEC counsel to meet and confer regarding forensic accounting report	Fates, Edward (Ted)	1.60	1,101.60	24,658.65	WO	HD	TR	_____
10/26/24	9819498	Analyze revisions to forensic accounting report and exhibits (.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.10	757.35	25,416.00	WO	HD	TR	_____
10/28/24	9831148	Phone call with Flanagan's counsel regarding update on deposition date and document production	Pham, Matt D.	0.10	48.15	25,464.15	WO	HD	TR	_____

05/20/25 16:50:55 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

<b>Fees for Matter 393983.00003.(Asset Investigation &amp; Recovery)</b>										
<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
10/29/24	9823639	Communications with counsel for A. Montgomery regarding meet and confer for Receiver's forensic accounting report	Fates, Edward (Ted)	0.20	137.70	25,601.85	WO	HD	TR	_____
10/29/24	9831159	Phone call with Roacho's counsel regarding status of document production (0.1); Begin reviewing newest document production from Ryan Flanagan containing text conversations (2.6)	Pham, Matt D.	2.70	1,300.05	26,901.90	WO	HD	TR	_____
10/30/24	9825261	Call with Receiver and counsel for A. Montgomery regarding forensic accounting and issues relating to potential settlement between A. Montgomery and SEC (.7) call with SEC counsel regarding same (.4) communications with Receiver and counsel for Hirschmann regarding questions relating to forensic accounting report (.6)	Fates, Edward (Ted)	1.70	1,170.45	28,072.35	WO	HD	TR	_____
10/30/24	9831198	Phone call with Flanagan's counsel regarding available deposition dates (0.1); Continue reviewing newest document production from Ryan Flanagan containing text conversations (0.5)	Pham, Matt D.	0.60	288.90	28,361.25	WO	HD	TR	_____
10/31/24	9826880	Discuss final revisions and edits to forensic accounting report and exhibits with Receiver	Fates, Edward (Ted)	0.70	481.95	28,843.20	WO	HD	TR	_____
10/31/24	9831220	Continue reviewing Ryan Flanagan's text conversations (2.5); Begin reviewing and analyzing document production from	Pham, Matt D.	3.50	1,685.25	30,528.45	WO	HD	TR	_____

05/20/25 16:50:55 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 Mike Roacho (1.8)	Timekeeper	Hours	Fees	Sum	Circle Action			
11/01/24	9834295	Phone calls with Flanagan's counsel and Murchison's counsel regarding deposition dates	Pham, Matt D.	0.10	48.15	30,576.60	WO	HD	TR	_____
11/04/24	9850570	Email correspondence with Flanagan's counsel and Roacho's counsel regarding deposition dates	Pham, Matt D.	0.20	96.30	30,672.90	WO	HD	TR	_____
11/05/24	9850578	Email correspondence with Roacho's counsel regarding deficiency in document production	Pham, Matt D.	0.30	144.45	30,817.35	WO	HD	TR	_____
11/08/24	9838843	Advise on issues relating to document production and deposition of M. Roacho	Fates, Edward (Ted)	0.30	206.55	31,023.90	WO	HD	TR	_____
11/08/24	9850594	Phone call and email correspondence with Roacho's counsel regarding schedule for outstanding document production	Pham, Matt D.	0.30	144.45	31,168.35	WO	HD	TR	_____
11/13/24	9850210	Confer with Ted Fates regarding clawback demand letters	Pham, Matt D.	0.30	144.45	31,312.80	WO	HD	TR	_____
11/14/24	9846349	Discuss change of attorney for M. Roacho and strategy regarding upcoming document production and deposition	Fates, Edward (Ted)	0.40	275.40	31,588.20	WO	HD	TR	_____
11/14/24	9850228	Confer with Ted Fates regarding outstanding depositions (0.2); Phone call with Roacho's new counsel regarding deposition scheduling (0.2); Phone calls with Flanagan's counsel regarding deposition scheduling (0.1)	Pham, Matt D.	0.50	240.75	31,828.95	WO	HD	TR	_____

05/20/25 16:50:55 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			
11/15/24	9850247	Phone calls with Murchison's counsel and Flanagan's counsel regarding deposition scheduling (0.2); Email correspondence with Roacho's counsel regarding deposition rescheduling (0.1)	Pham, Matt D.	0.30	144.45	31,973.40	WO	HD	TR	_____
11/18/24	9849617	Advise on scheduling and strategy for Roacho and Flanagan depositions (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.40	275.40	32,248.80	WO	HD	TR	_____
11/18/24	9859712	Confer with Ted Fates regarding update on rescheduled depositions (0.2); Email correspondence with client regarding rescheduled depositions (0.2)	Pham, Matt D.	0.40	192.60	32,441.40	WO	HD	TR	_____
11/25/24	9864508	Prepare amended deposition subpoena to Miguel Roacho and email correspondence with Roacho's counsel regarding same (0.3); Review and analyze documents produced by Miguel Roacho (2.8)	Pham, Matt D.	3.10	1,492.65	33,934.05	WO	HD	TR	_____
11/27/24	9865492	Conference with M. Pham regarding document production analysis (.2); begin document production analysis (3.9).	Kebeh, Alphamorlai "Mo"	4.10	1,955.70	35,889.75	WO	HD	TR	_____
11/28/24	9865872	Continue analysis of voluminous Roacho production (2.6).	Kebeh, Alphamorlai "Mo"	2.60	1,240.20	37,129.95	WO	HD	TR	_____
11/29/24	9864518	Continue reviewing document produced by Miguel Roacho and continue preparing outline for deposition thereof (3.5); Continue reviewing documents produced by Ryan Flanagan (3.4)	Pham, Matt D.	6.90	3,322.35	40,452.30	WO	HD	TR	_____

05/20/25 16:50:55 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	
11/29/24	9865518	continue analysis of voluminous document production from M. Roacho (5.0).	Kebeh, Alphamorlai "Mo"	5.00	2,385.00	42,837.30	WO	HD	TR
11/30/24	9865533	Continue analysis of M. Roacho document production (4.5); analyze/synthesize notes regarding document production review in connection with draft memorandum to M. Pham regarding same (1.4).	Kebeh, Alphamorlai "Mo"	5.90	2,814.30	45,651.60	WO	HD	TR
11/30/24	9867058	Review Qualcan deposition transcripts and other documents for preparation of Roacho deposition	Pham, Matt D.	2.60	1,251.90	46,903.50	WO	HD	TR
12/01/24	9875252	Email correspondence with Flanagan's and Murchison's counsel regarding Flanagan deposition moving forward	Pham, Matt D.	0.70	337.05	47,240.55	WO	HD	TR
12/02/24	9875324	Continue preparing for deposition of Miguel Roacho (2.0); Continue preparing for deposition of Ryan Flanagan (1.4)	Pham, Matt D.	3.40	1,637.10	48,877.65	WO	HD	TR
12/03/24	9875334	Phone call with Murchison's counsel regarding Flanagan's deposition moving forward (0.1); Confer with Mo Kebeh regarding his analysis and review of document productions from Miguel Roacho (0.3); Continue preparing for deposition of Miguel Roacho (1.8); Continue preparing for deposition of Ryan Flanagan (2.8)	Pham, Matt D.	5.00	2,407.50	51,285.15	WO	HD	TR
12/04/24	9869813	Advise on issues and strategy for M. Roacho deposition	Fates, Edward (Ted)	0.20	137.70	51,422.85	WO	HD	TR

05/20/25 16:50:55 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	
12/04/24	9875343	Email correspondence with Flanagan's and Murchison's counsel regarding confirmation of deposition moving forward (0.1); Continue preparing for deposition of Miguel Roacho and finalize deposition outline with respect thereto (2.5); Attend and take deposition of Miguel Roacho (5.1); Continue preparing for deposition of Ryan Flanagan (2.2)	Pham, Matt D.	9.90	4,766.85	56,189.70	WO	HD	TR
12/05/24	9871482	Analyze and advise on issues and strategy for Flanagan, Everege and Roacho depositions, next steps re: same (.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.10	757.35	56,947.05	WO	HD	TR
12/05/24	9875347	Continue preparing for deposition of Ryan Flanagan and finalize latest version of deposition outline (1.9); Attend deposition of Ryan Flanagan (2.7); Meet with Murchison's counsel regarding possible settlement and issues with Receiver's claims and Murchison's defenses (1.2); Confer with Ted Fates regarding recaps of depositions and issues raised by Murchison's counsel (0.7)	Pham, Matt D.	6.50	3,129.75	60,076.80	WO	HD	TR
12/17/24	9886408	Discuss analysis and next steps regarding transfers relating to properties in Florida tied to P. Williams with Receiver	Fates, Edward (Ted)	0.30	206.55	60,283.35	WO	HD	TR
12/18/24	9893699	Email correspondence with Dickinson Wright general counsel regarding Everege deposition	Pham, Matt D.	0.40	192.60	60,475.95	WO	HD	TR

05/20/25 16:50:55 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

### Proforma Summary

#### Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	26.20	688.50	18,038.70
002510	Pham, Matt D.	70.70	481.50	34,042.05
002661	Kebeh, Alphamorlai "Mo"	17.60	477.00	8,395.20
		<u>114.50</u>		<u>\$60,475.95</u>
Subtotal Fees				\$60,475.95
Discount				0.00
Total Fees				60,475.95
Total Disbursements				0.00

#### Attorney Billing Instructions

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

#### Billing Instructions

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

#### Account Summary – As Of 05/20/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	175,269.15	175,269.15	0.00	15,355.35	15,355.35	0.00	666,050.85	666,050.85	0.00
Unbilled Adj	16.36	16.36	0.00	0.00	0.00	0.00	22.48	22.48	0.00
Billed	322,730.30	322,730.30	0.00	173,580.68	173,580.68	0.00	590,209.13	590,209.13	0.00
Collected	322,730.30	322,730.30	0.00	173,580.68	173,580.68	0.00	590,209.13	590,209.13	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>75,831.30</b>	<b>75,831.30</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						

05/20/25 16:50:55 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

<b>Unalloc</b>	<b>0.00</b>
<b>Payment</b>	
<b>Client Trust</b>	<b>0.00</b>
<b>Balance</b>	

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**Billing Address**

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

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05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 393983.00004      Client Name: Krista Freitag, as Receiver for Integrat  
Date of Last Billing: 04/29/25      Matter Name: Reporting  
Proforma Number: 1337787  
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	
11/18/24	9849837	Work on Receiver's 7th interim report (1.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	895.05	895.05	WO	HD	TR
11/19/24	9852152	Revisions to Receiver's 7th interim report (.4) meet and confer communications with SEC counsel re: same (.2) finalize report (.3)	Fates, Edward (Ted)	0.90	619.65	1,514.70	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.20	688.50	1,514.70
		2.20		\$1,514.70
Subtotal Fees				\$1,514.70
Discount				0.00
Total Fees				1,514.70
Total Disbursements				0.00

**Attorney Billing Instructions**

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

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

( ) BILL COST ONLY ( ) Transfer All

**Billing Instructions**

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 05/20/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,199.85	4,199.85	0.00	1,652.40	1,652.40	0.00	16,916.40	16,916.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	6,726.60	6,726.60	0.00	2,595.60	2,595.60	0.00	13,749.30	13,749.30	0.00
Collected	6,726.60	6,726.60	0.00	2,595.60	2,595.60	0.00	13,749.30	13,749.30	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>3,167.10</b>	<b>3,167.10</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 393983.00005      Client Name: Krista Freitag, as Receiver for Integrat  
(Ted)  
Date of Last Billing: 04/29/25      Matter Name: Operations & Asset Sales  
Proforma Number: 1337787  
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	
10/01/24	9789850	Communications with G. Rodriguez re: overbid deadline and lack of overbids for Gracemoor property (.2) prepare notice of non-receipt of overbids (.3)	Fates, Edward (Ted)	0.50	344.25	344.25	WO	HD	TR
10/07/24	9796787	Communications with SEC counsel regarding judgment lien on Hacienda property and payoff statement from US Treasury	Fates, Edward (Ted)	0.40	275.40	619.65	WO	HD	TR
10/08/24	9798669	Communications with SEC counsel regarding judgment lien on Hacienda property and issues relating to same (.6) discuss same with Receiver (.5)	Fates, Edward (Ted)	1.10	757.35	1,377.00	WO	HD	TR
10/11/24	9802179	Discuss escrow and accounting-related issues for call with SEC relating to judgment lien on Hacienda with Receiver (.6) call with Receiver and SEC counsel regarding SBA judgment lien issues (.8) analyze and advise Receiver on issues relating to potential sales of two vehicles (.4)	Fates, Edward (Ted)	1.80	1,239.30	2,616.30	WO	HD	TR

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/18/24	9810397	Communications with Receiver and SEC counsel regarding Hacienda sale closing and SBA judgment lien issue	Fates, Edward (Ted)	0.60	413.10	3,029.40	WO	HD	TR
10/29/24	9823428	Communications with counsel for HOA for Gracemoor property regarding status of sale approval	Fates, Edward (Ted)	0.30	206.55	3,235.95	WO	HD	TR
10/31/24	9826947	Analyze and advise G. Rodriguez on sale issues relating to Fort Lauderdale condominium	Fates, Edward (Ted)	0.90	619.65	3,855.60	WO	HD	TR
11/05/24	9835443	Communications with Receiver and court clerk regarding time sensitivity on pending sale approval motions for Gracemoor and Hacienda	Fates, Edward (Ted)	0.40	275.40	4,131.00	WO	HD	TR
11/07/24	9837492	Communications with Receiver and counsel for Hirschmann regarding vandalism incident at Gracemoor property (.6) analyze order approving Gracemoor and Hacienda sale motions, advise Receiver re: same (.2)	Fates, Edward (Ted)	0.80	550.80	4,681.80	WO	HD	TR
11/08/24	9838839	Analyze issues relating to potential sale of Rari Nutrition assets (.2) discuss requests from title company regarding closing of sale of Hacienda property with Receiver (.4) prepare summary of sale approval process for title company (.5)	Fates, Edward (Ted)	1.10	757.35	5,439.15	WO	HD	TR
11/11/24	9842766	Analyze information from Receiver relating to accounting of sources of funds for purchase of Hacienda property to address SBA lien issue	Fates, Edward (Ted)	0.40	275.40	5,714.55	WO	HD	TR

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
11/12/24	9843257	Communications with Receiver and G. Rodriguez regarding documents requested by escrow / title for Hacienda sale	Fates, Edward (Ted)	0.40	275.40	5,989.95	WO	HD	TR
11/13/24	9844682	Discuss communication from HOA regarding vandalism at Gracemoor property with Receiver and G. Rodriguez (.2) discuss interest in Rari Nutrition assets with Receiver (.3) discuss SBA lien issue for Hacienda and accounting issues relating to same with Receiver (.3)	Fates, Edward (Ted)	0.80	550.80	6,540.75	WO	HD	TR
11/14/24	9846127	Analyze escrow holdback issue for Hacienda sale (.3) advise Receiver re: same (.3) discuss inquiries from reporter regarding vandalism at Gracemoor and related issues with Receiver (.5)	Fates, Edward (Ted)	1.10	757.35	7,298.10	WO	HD	TR
11/15/24	9847051	Call/emails re: possible news story concerning vandalism at Gracemoor property and related issues with Receiver and media consultant	Fates, Edward (Ted)	0.60	413.10	7,711.20	WO	HD	TR
11/19/24	9852081	Review Las Vegas news article on Gracemoor property sale (.1) advise Receiver re: same (.1) assist G. Rodriguez with preparing addendum to sale contract for Summersweet storage unit (.5)	Fates, Edward (Ted)	0.70	481.95	8,193.15	WO	HD	TR
11/22/24	9856890	Discuss issues relating to sale of Summersweet storage condo with Receiver	Fates, Edward (Ted)	0.30	206.55	8,399.70	WO	HD	TR

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
12/09/24	9875111	Advise G. Rodriguez on Gracemoor transfer tax issue	Fates, Edward (Ted)	0.20	137.70	8,537.40	WO	HD	TR	_____
12/11/24	9878501	Advise G. Rodriguez on issues relating to transfer tax for Gracemoor sale	Fates, Edward (Ted)	0.20	137.70	8,675.10	WO	HD	TR	_____
12/18/24	9887612	Analyze and advise Receiver regarding addendum to sale contract for Summersweet storage condo property	Fates, Edward (Ted)	0.40	275.40	8,950.50	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	13.00	688.50	8,950.50
		13.00		\$8,950.50
Subtotal Fees				\$8,950.50
Discount				0.00
Total Fees				8,950.50
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 05/20/25**

Fiscal YTD

Calendar YTD

LTD

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	62,309.25	62,309.25	0.00	16,317.45	16,317.45	0.00	83,239.65	83,239.65	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	49,021.20	49,021.20	0.00	47,988.45	47,988.45	0.00	57,971.70	57,971.70	0.00
Collected	49,021.20	49,021.20	0.00	47,988.45	47,988.45	0.00	57,971.70	57,971.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>25,267.95</b>	<b>25,267.95</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

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**Billing Address**

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

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05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 393983.00006      Client Name: Krista Freitag, as Receiver for Integrat  
(Ted)  
Date of Last Billing: 04/29/25      Matter Name: Claims & Distributions  
Proforma Number: 1337787  
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	
10/24/24	9817571	Respond to call from investor regarding status of claims process, recovery efforts and future distributions	Fates, Edward (Ted)	0.40	275.40	275.40	WO	HD	TR
11/07/24	9837523	Discuss anticipated claim procedures motion and notices to investors regarding claim amounts with Receiver (.4) review letter sent to court by investor, email from court clerk re: same (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.70	481.95	757.35	WO	HD	TR
11/12/24	9844447	Work on motion for approval of claim submission and review procedures	Fates, Edward (Ted)	1.40	963.90	1,721.25	WO	HD	TR
11/13/24	9844659	Discuss motion for approval of claim procedures with Receiver	Fates, Edward (Ted)	0.30	206.55	1,927.80	WO	HD	TR
11/20/24	9853489	Work on revisions to claim procedures motion, claims notice, proof of claim forms (1.4) discuss same with Receiver (.3) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.90	1,308.15	3,235.95	WO	HD	TR

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

<b>Fees for Matter 393983.00006.(Claims &amp; Distributions)</b>										
<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>		<b>Action</b>	
12/05/24	9872060	Analyze communication from US DOJ relating to judgment against investor (.2) respond to same (.1) discuss SEC questions relating to claim procedures motion with Receiver (.3)	Fates, Edward (Ted)	0.60	413.10	3,649.05	WO	HD	TR	_____
12/06/24	9872421	Communications with judgment/restituion creditor of investor regarding investor claim in receivership and potential distributions	Fates, Edward (Ted)	0.50	344.25	3,993.30	WO	HD	TR	_____
12/16/24	9883762	Analyze letter and issues raised by vendor regarding claim against Gracemoor property and assertion of security interest	Fates, Edward (Ted)	0.30	206.55	4,199.85	WO	HD	TR	_____
12/17/24	9886411	Discuss vendor claim and lien issue with Receiver	Fates, Edward (Ted)	0.30	206.55	4,406.40	WO	HD	TR	_____
12/18/24	9887400	Advise Receiver on language for investor update relating to claims process	Fates, Edward (Ted)	0.20	137.70	4,544.10	WO	HD	TR	_____
12/19/24	9889090	Respond to counsel for investor regarding claims and notices	Fates, Edward (Ted)	0.30	206.55	4,750.65	WO	HD	TR	_____
12/23/24	9891555	Communications with Receiver and special counsel regarding creditor claim and lien issue (.2) analyze and advise on communications from investor (.2)	Fates, Edward (Ted)	0.40	275.40	5,026.05	WO	HD	TR	_____
<b>Proforma Summary</b>										
<b>Timekeeper Number</b>	<b>Timekeeper</b>		<b>Hours</b>		<b>Rate</b>	<b>Amounts</b>				
001665	Fates, Edward (Ted)		7.30		688.50	5,026.05				

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

### Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
		7.30		\$5,026.05
Subtotal Fees				\$5,026.05
Discount				0.00
Total Fees				5,026.05
Total Disbursements				0.00

### Attorney Billing Instructions

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

### Billing Instructions

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

### Account Summary – As Of 05/20/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	19,346.85	19,346.85	0.00	12,048.75	12,048.75	0.00	41,872.50	41,872.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	11,222.55	11,222.55	0.00	4,337.55	4,337.55	0.00	24,797.70	24,797.70	0.00
Collected	11,222.55	11,222.55	0.00	4,337.55	4,337.55	0.00	24,797.70	24,797.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>17,074.80</b>	<b>17,074.80</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

---

**Billing Address**

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

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05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00007 (Krista Freitag, as Receiver for Integrat) (Third Party Recoveries)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 393983.00007 Client Name: Krista Freitag, as Receiver for Integrat  
Date of Last Billing: 04/29/25 Matter Name: Third Party Recoveries  
Proforma Number: 1337787  
Client/Matter Joint Group # 393983.1 Client Matter Number:

**Fees for Matter 393983.00007.(Third Party Recoveries)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
11/13/24	9844657	Discuss recipients of transfers from receivership entities and process for pursuing potential fraudulent transfer claims with Receiver (.6) advise on status and next steps for same (.5)	Fates, Edward (Ted)	1.10	757.35	757.35	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.10	688.50	757.35
		1.10		\$757.35
Subtotal Fees				\$757.35
Discount				0.00
Total Fees				757.35
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00007 (Krista Freitag, as Receiver for Integrat) (Third Party Recoveries)

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

**Account Summary – As Of 05/20/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	73,676.25	73,676.25	0.00	71,197.65	71,197.65	0.00	88,182.00	88,182.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	16,227.00	16,227.00	0.00	5,094.90	5,094.90	0.00	16,227.00	16,227.00	0.00
Collected	16,227.00	16,227.00	0.00	5,094.90	5,094.90	0.00	16,227.00	16,227.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>71,956.00</b>	<b>71,955.00</b>	<b>1.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 393983.00009 Client Name: Krista Freitag, as Receiver for Integrat  
Date of Last Billing: 04/29/25 Matter Name: Employment/Fees  
Proforma Number: 1337787  
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	
11/21/24	9855177	Discuss preparation of 5th interim fee application with Receiver	Fates, Edward (Ted)	0.20	137.70	137.70	WO	HD	TR
11/22/24	9856285	Analyze and revise Receiver's 5th interim fee application (.6) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.70	481.95	619.65	WO	HD	TR
11/27/24	9862540	Meet and confer communications with SEC counsel regarding Fifth Interim Fee Applications	Fates, Edward (Ted)	0.20	137.70	757.35	WO	HD	TR
12/17/24	9886140	Finalize Receiver's fifth interim fee application, notice of hearing and proposed order	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

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

### Proforma Summary

#### Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Total Disbursements				0.00

#### Attorney Billing Instructions

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

#### Billing Instructions

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

#### Account Summary – As Of 05/20/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,754.00	2,754.00	0.00	826.20	826.20	0.00	5,714.55	5,714.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	2,891.70	2,891.70	0.00	1,721.25	1,721.25	0.00	3,924.45	3,924.45	0.00
Collected	2,891.70	2,891.70	0.00	1,721.25	1,721.25	0.00	3,924.45	3,924.45	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>1,790.10</b>	<b>1,790.10</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

#### Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.  
E3 Advisors

05/20/25 16:50:56 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

501 West Broadway, Suite 290  
San Diego, CA 92101

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