2 3 4 5 6 7 8 9	<ul> <li>DAVID R. ZARO (BAR NO. 124334)</li> <li>E-Mail: dzaro@allenmatkins.com</li> <li>MATTHEW D. PHAM (BAR NO. 28770)</li> <li>E-Mail: mpham@allenmatkins.com</li> <li>ALLEN MATKINS LECK GAMBLE</li> <li>MALLORY &amp; NATSIS LLP</li> <li>865 South Figueroa Street, Suite 2800</li> <li>Los Angeles, California 90017-2543</li> <li>Phone: (213) 622-5555</li> <li>Fax: (213) 620-8816</li> <li>EDWARD G. FATES (BAR NO. 227809)</li> <li>E-Mail: tfates@allenmatkins.com</li> <li>ALLEN MATKINS LECK GAMBLE</li> <li>MALLORY &amp; NATSIS LLP</li> <li>One America Plaza</li> <li>600 West Broadway, 27th Floor</li> <li>San Diego, California 92101-0903</li> <li>Phone: (619) 233-1155</li> <li>Fax: (619) 233-1158</li> </ul>	
12	Attorneys for Court-Appointed Receiver KRISTA L. FREITAG	
13	UNITED STATES	DISTRICT COURT
14	CENTRAL DISTRIC	CT OF CALIFORNIA
15		
16		
17	SECURITIES AND EXCHANGE COMMISSION,	Case No. 8:23-cv-00855-JWH (KES)
18	Plaintiff,	RECEIVER'S NINTH INTERIM REPORT AND RECOMMENDATIONS
19	vs.	
20	INTEGRATED NATIONAL RESOURCES, INC. dba	
21	WEEDGENICS, ROLF MAX HIRSCHMANN aka "MAX	
22	BERGMANN," PATRICK EARL WILLIAMS,	
23	Defendants, and,	
24		
25	WEST COAST DEVELOPMENT LLC, INR CONSULTING LLC (WYOMING ENTITY) OCEANS 19 INC	
26	AUTOBAHN PERFORMANCE LLC,	
27	ONE CLICK GENERAL MEDIA INC., OPUS COLLECTIVE, JOHN ERIC FRANCOM, INR-CA INVESTMENT	
28	HOLDINGS, LLC, MICHAEL DELGADO. TOTAL SOLUTION	
LAW OFFICES Allen Matkins Leck Gamble Mallory & Natsis LLP		

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

13

#### I. <u>BACKGROUND</u>

This equity receivership involves a large, complex, and wide-ranging group of enterprises and assets which are the subject of the Complaint filed by the Securities and Exchange Commission. This quarterly report covers the Receiver's activities during the first quarter of 2025, including accounting information from inception of the receivership on May 19, 2023 through March 31, 2025, and also reflects the status of certain assets as of the date of this report, if material activity has occurred between March 31, 2025 and the date of this report.

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#### II. <u>EXECUTIVE SUMMARY</u>

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

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

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

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

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

• Fourteen (14) mostly exotic and luxury vehicles,

Over \$8 million in cash (see Receipts and Disbursements below),

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- Six (6) real properties, and
- Various pieces of jewelry and artwork.

9 During the first quarter of 2025, the Receiver sought and received approval
10 for a claims process (motion was filed on February 5, 2025, Dkt 307 and
11 subsequently was approved on March 13, 2025, Dkt 335), continued pursuing the
12 sale of the recovered assets (again, this quarter, more than \$2.4 million of net sales
13 proceeds were collected from asset sales), and continued pursuing and investigating
14 potential claims and recoveries.

As discussed herein, the Receiver and her professionals have made significant progress, especially considering the minimal cooperation and very limited organic company data available. However, work remains to be done – notably on investigating and pursuing clawbacks and third-party claims,<sup>1</sup> the monetization of the remaining personal property assets recovered to date, and the administration of claims and subsequent distributions to investors.

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## III. <u>SUMMARY OF RECEIVER'S ACTIVITIES</u>

1. <u>Business Operations</u>

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

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

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

5

#### 2. <u>Funds Recovered to Date</u>

The Receiver promptly notified each bank and known financial institution 6 identified as having an account associated with the Receivership Entities. Through 7 8 March 31, 2025, the Receiver recovered over \$8.0 million from bank accounts previously controlled by the defendants, legal retainers, a pre-receivership vehicle 9 10 deposit, a post-TRO sale of a vehicle owned by Autobahn, and funds withdrawn from accounts by Defendant Hirschmann (which funds were previously unknown to 11 the Commission but discovered by the Receiver). See below in the Receipts and 12 Disbursements section for more detail. 13

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

18

#### 3. <u>Real Property Assets Recovered to Date</u>

As previously discussed, the Receiver confirmed possession of six (6) real 19 20 properties (all were residential except for one (1) commercial storage unit, and each property is part of a homeowner's association) owned by Autobahn. Pursuant to the 21 Order allowing for the marketing and sale of the assets, all real properties were 22 23 listed by the summer of 2024 and as of March 31, 2025, all real property was sold. 24 During the first quarter of 2025, the final two real property assets, the Summersweet 25 storage condo and the Isle of Venice property, sold pursuant to the Court's respective orders approving such sales, Dkt. 319 and Dkt. 336. 26 27

28

It should be noted that the Hacienda and Summersweet properties included 1 overbidders who collectively, materially improved the sale prices of the assets. 2 Regarding the Hacienda Property, the Receiver also continued to work with the 3 Commission and the Small Business Administration on a potential relinquishment of 4 the net sale proceeds holdback established at closing due to a Defendant 5 Hirschmann lien which attached to the Hacienda Property; such efforts proved 6 successful and the receivership estate recovered an additional \$521,000 of the 7 8 Hacienda Property net sale proceeds in May 2025. Finally, the Receiver used the 2024 National Association of Realtors ("NAR") settlement as the basis to negotiate 9 highly reduced commissions on all the residential properties. 10

11

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

In addition to the real property, the Receiver noted dozens of vehicle 12 purchases by Receivership Entities or with funds raised from investors. To date, the 13 Receiver identified 13 vehicles owned by Autobahn, all but one were recovered 14 from Defendant Hirschman. Almost immediately after the TRO was entered on 15 May 19, 2023, Hirschmann sold a Maserati automobile for \$170,000 cash (about 16 half of what Autobahn had purchased it for six months earlier). The Receiver was 17 able to recover \$170,000, which Hirschmann had instructed the buyer to wire to a 18 19 criminal defense law firm. Further recovery from the fraudulent transfer of the 20 Maserati resulted in the collection of an additional \$42,000 from the dealer that sold the vehicle to an unrelated third party in what appears to be an arms-length 21 22 transaction.

23

The Receiver is also aware of numerous vehicles owned by Defendants or 24 Relief Defendants. Relief Defendant Campbell turned over two (2) vehicles. A third vehicle, a Ford Mustang, remains in Relief Defendant Campbell's possession. 25 26 The vehicle is believed to have no net value due to an existing loan secured by the vehicle. 27

28

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

8 As previously discussed, the Receiver signed a listing agreement with a reputable asset disposition firm and marketing of the vehicles is ongoing. During 9 the first quarter of 2025, two vehicles sold (the Mercedes S63 and G63). As such, to 10 date, eleven (11) vehicles have sold; net sale proceeds for 10 of them are reflected in 11 the receipts and disbursements through March 31, 2025 below. The remaining three 12 (3) unsold vehicles are exotic and higher end luxury vehicles, which are expected to 13 take more time to sell. Offers continue to come in, are negotiated, and the pricing 14 for the vehicles is regularly adjusted to reflect current market values. 15

16 Also, the Receiver identified hundreds of thousands of dollars of jewelry 17 purchases. Approximately thirteen (13) jewelry pieces have been recovered and secured in a safe deposit box at a Southern California bank vault. The Receiver is 18 19 likewise pursuing avenues to sell the jewelry. In the third quarter of 2024, an 20 appraisal was commissioned to estimate both the insurance and fair market value of 21 the jewelry. For insurance purposes, the jewelry retained its value. Unfortunately, 22 the fair market value for jewelry is highly subjective and the appraiser determined 23 that in an auction or subsequent sale, that the items would likely sell for only a fraction of the original retail price. During the period, the Receiver, through staff, 24 25 reached out to various consignment and auction sellers for opinions on value and to 26 determine the best strategy for the sale of these items. These sellers noted a highly 27 softening market for jewelry and that individual tastes and preferences will greatly 28 influence the marketability for these items. Accordingly, it was determined an

individual approach to each sale would likely yield a higher value than coordinating
 all items with one consignment seller.

Finally, as previously discussed, four large metal art sculptures<sup>2</sup> weighing 3 hundreds of pounds each were located in the Boise area. No auctioneers or art 4 5 dealers were willing to take on the sale of these items, so they were re-sold to the original retailer located in Las Vegas, Nevada. As part of the transaction, the 6 7 retailer coordinated the pickup and transport of the items to their location. 8 Additionally, the sale of the items was necessary as the items were held at the 9 Hacienda property and keeping them at that location would have interfered with the 10 sale of that property.

Efforts to identify, locate and recover additional jewelry, luxury goods, 11 12 artwork and other valuable personal property have been ongoing. The Receiver attempted to recover another undisclosed valuable piece of art from Defendant 13 14 Hirschmann, which the Receiver discovered was purchased by Oceans 19. Defendant Hirschmann, however, claims that the piece was destroyed while moving 15 16 from the Hacienda property and that it was thrown in the trash. Hirschmann was 17 unable to provide a photograph of the damage to the painting, nor did he even notify the Receiver that the painting existed or was damaged. Attached as **Exhibit A** is a 18 19 schedule detailing the assets collected to date, including real property, automobiles, 20 jewelry and artwork along with notes on their present status.

21

## 5. <u>Real and Personal Property Insurance</u>

As all real property has sold, all general liability and property insurance has been cancelled. The Receiver previously reorganized coverage on the vehicles in her possession to obtain quality coverage that considered the lack of daily driving on the vehicles, resulting in reduced costs to the receivership estate. As vehicles are sold, they have been and will be removed from insurance coverage.

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LAW OFFICES Allen Matkins Leck Gamble Mallory & Natsis LLP The pieces were 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.

Coverage for the jewelry was previously placed, however, after determining
 that the jewelry would not be worn daily or held in a home environment, the carrier
 withdrew the coverage. As efforts to sell the jewelry are underway, a policy was
 recently placed to cover the jewelry.

5

#### 6. <u>Other Investments and Loans</u>

6 After reviewing the banking records and then documents and information 7 produced by the web hosting company in response to her subpoena, the Receiver 8 discovered an operating business owned by Raw Sports, LLC (a Hirschmann 9 controlled entity), which had recently purchased Rari Nutrition ("Rari"). Rari was a nutritional supplements company largely sold through the Amazon.com website, but 10 also through its own website at rarinutrition.com.<sup>3</sup> Through various subpoenas, the 11 12 Receiver confirmed that Raw Sports, LLC dba Rari was an existing operating business that Hirschmann purchased through Raw Sports, LLC, just prior to the 13 14 Receiver's appointment with what appears to be investor funds. After the Receiver obtained this information, Hirschmann agreed to turn control of the company and its 15 operations over to the Receiver. An experienced Amazon.com operations team was 16 17 operating the virtual storefront, along with existing product, which consisted of 18 various health/exercise supplements. The Receiver worked with the operations team 19 and continued to gather information regarding the business to support its operations 20 (from manufacturing of product inventory to warehouse inventory to insurance). 21 Unfortunately, the prior net losses reported, the limited revenue activity and complete lack of cooperation by the manufacturer of the supplements has led to a 22 23 wind down of operations. The Receiver also did discover that the intellectual 24 property associated with the business (e.g., the trademark) had lapsed and was not 25 recoverable by the Receiver (the window had passed prior to the Receiver's 26 appointment).

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28 <sup>3</sup> No known sales occurred through the website and the Receiver disabled the capability for sales on it.

#### 7. <u>Digital Records</u>

1

2 With limited cooperation from the Defendants and Relief Defendants, the 3 Receiver has worked to identify payments linked to the Receivership Entities and secure their business records. Subpoenas were issued to key vendors, including 4 internet service providers and website hosts, requiring them to preserve all relevant 5 documents. Initially, the Receiver took control of six (6) primary domains and nine 6 7 (9) add-on domains, later expanding to 47 domains. However, 34 domains were 8 "parked" or did not have a website or email account associated with them. 9 Hirschmann, through counsel, disputed the inclusion of certain domains under the PI Order. Gaining control of the domains allowed the Receiver to archive websites and 10 redirect traffic to www.INRreceivership.com. To preserve assets, the Receiver has 11 maintained domain renewals while transitioning parked domains to a lower-cost 12 option. During the period, the original hosting company notified their customers 13 14 that they were selling their interests in managing domains to a third party. This 15 changed required additional, modest administrative work.

In addition to website traffic, the domains are also capable of having
associated email accounts, e.g. <u>user@inr.green</u> or <u>user@ocgm.com</u>. The Receiver
noted various instances of the Defendants or Relief Defendants using those email

19 accounts prior to the Receiver's takeover (e.g. <u>max@ocgm.com</u>,

20 <u>max.bergmann@inr.green</u>, <u>max@xjus.com</u> or <u>aia.montgomery@inr.green</u>), however

21 upon taking control of those domains, the Receiver noted that almost no emails

22 existed in the accounts. Furthermore, the Receiver discovered that certain of the

23 receivership entity accounts were deleted and has been able to trace those deletion

24 efforts to the IP address associated with the Defendant Hirschmann occupied

25 Hacienda property shortly after the TRO was entered.

Finally, the Receiver also worked to identify payments to accounting
software, customer relationship manager (CRM) entities, or similar types of
programs. Only one such vendor was identified and a subpoena for records was

issued. While the Receiver was able to glean certain information from the resulting
 production, limited transactional level detail existed in the account produced to the
 Receiver. As a result, no useful accounting or investor transactional information can
 be derived from this production.

5

## 8. <u>Receipts and Disbursements</u>

6 The following reflects the cash activity of the receivership estate for the
7 period from May 19, 2023, through March 31, 2025. A summary of the receipts and
8 disbursements is as follows:

9	Total Bank Account Balances at takeover	\$6,541,700
10	Hirschmann Withdrawal Recovery	\$1,128,921
11	Legal Retainer Recovery	\$376,086
12	Maserati Settlement Recovery	\$42,000
13	Vehicle Deposit Recovery	\$30,000
14	Interest Income	\$370,040
15	Parking Lease Income	\$500
16	Raw Sports Net Operating Revenue	\$49,124
17 18	Personal Property Sale Proceeds (Art and Jewelry)	\$6,500
19	Sultana Property Net Sale Proceeds	\$688,732
20	River Park Net Sale Proceeds	\$632,867
21	Hacienda Net Sale Proceeds <sup>4</sup>	\$1,100,432
22	Gracemoor Net Sale Proceeds	\$1,007,060
23	Summersweet Net Sale Proceeds	\$202,430
24	Isle of Venice Net Sale Proceeds	\$1,990,553
25	Vehicle Sale Net Sale Proceeds	\$955,500
26	TOTAL RECEIPTS	\$15,122,445

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<sup>&</sup>lt;sup>4</sup> 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.

Raw Sports Operating Expenses	(\$43,452)	
Real Property Related Expenses (e.g., HOA monthly dues, property taxes, insurance)	(\$258,221)	
Vehicle Expenses (e.g., repossession, transportation, security, storage, insurance)	(\$264,542)	
General Receivership Expenses (primarily includes asset search related expenses)	(\$66,424)	
Receiver Fees and Expenses	(\$924,523)	
Receivership Legal Fees and Expenses	(\$720,092)	
TOTAL DISBURSEMENTS	(\$2,277,254)	
CASH BALANCE AT DECEMBER 31, 2024 \$12,845,191		
As of March 31, 2025, outstanding checks totaled \$15,100, thus the actual		
bank balance as of March 31, 2025, was \$12,830,091. As noted above, an		
4 additional \$521,000 was recovered from the sale of the Hacienda property in		
16 0005	fenda property m	
May 2025.	nenda property in	
May 2025.      9.    Investor Communications	ienda property in	
•		
9. <u>Investor Communications</u>	lished a dedicated we	
<ul> <li>9. <u>Investor Communications</u></li> <li>Upon entry of the TRO, the Receiver promptly established</li> </ul>	lished a dedicated we te which is used to	
9. <u>Investor Communications</u> Upon entry of the TRO, the Receiver promptly established a link to same on the Receiver's company's website	lished a dedicated we te which is used to requently asked	
9. <u>Investor Communications</u> Upon entry of the TRO, the Receiver promptly establishing age with a link to same on the Receiver's company's websit provide case information, regular updates, and answers to find	lished a dedicated we te which is used to requently asked e is	
	Real Property Related Expenses (e.g., HOA monthly dues, property taxes, insurance)Vehicle Expenses (e.g., repossession, transportation, security, storage, insurance)General Receivership Expenses (primarily includes asset search related expenses)Receiver Fees and ExpensesReceivership Legal Fees and ExpensesTOTAL DISBURSEMENTSCASH BALANCE AT DECEMBER 31, 2024As of March 31, 2025, outstanding checks totaled \$1 bank balance as of March 31, 2025, was \$12,830,091. As n	

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

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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.

7 On February 4, 2025, the Receiver filed her Motion for Order: 1) Approving 8 Procedures for the Administration of Claims against the Receivership Estate, 2) 9 Setting Claims Bar Date; and 3) Approving Claims Bar Date Notice and Proof of Claim Forms (Dkt. No. 307), which motion was approved by the Court on March 10 13, 2025 (Dkt. No. 335). During the fourth quarter of 2024 and first quarter of 11 2025, the Receiver and her team worked to review underlying investor records to 12 necessarily determine whether related prospective claimant's investment 13 transactions are to be aggregated or not. Requesting and performing this review of 14 investor records will expedite the claims review and reconciliation process once 15 claims are received back from prospective claimants. Ultimately, pursuant to the 16 17 Court's order, the Receiver prepared prepopulated claim forms for each prospective claimant based on the money in-money out forensic accounting results and the 18 19 aforementioned record review, and sent those forms to prospective claimants on or 20 before the April 21, 2025 deadline to do so. Thus far, the Receiver estimates more 21 than half of the prospective investor claimants have responded, and the Receiver's 22 team is in the process of sending a reminder email or letter regarding the June 20, 2025 deadline for claim responses. After the claims process is completed, the 23 Receiver will seek authority to make an interim distribution to investors and 24 25 creditors with approved claims.

26 **10.** Forensic Accounting

During the fourth quarter of 2024, the Receiver and her team completed theCourt-ordered forensic accounting, the report on which was filed on October 31,

2024 (Dkt. 289). Notably, the Receiver did not find transactions incurred by the 1 2 Receivership Entities which are associated with revenue generating cannabis operations, but did find material amounts of credit card payments, payments to 3 numerous (unexplained) non-investor individuals and entities (mentioned above), 4 payments to investors, cash withdrawals, real and personal property purchases 5 (discussed above), real property renovation/improvement related expenses, and 6 other personal affect-type transactions. The forensic accounting efforts have been 7 8 critical in assisting with the ongoing investigation of potential third-party claims and recoveries. It is also critically serving as the foundation for the claims and 9 10 ultimately the distribution process.

11 Given that no accounting system or data for the companies was located or turned over by any of the Defendants or Relief Defendants, the Receiver, through 12 her counsel, has issued numerous subpoenas to gather banking records (as discussed 13 above) and is using a project-specific and cost-effective AI software to upload the 14 tens of thousands of banking transactions into a database. This software saved 15 considerable time and expense and shortened the time required to complete the 16 accounting, which in some complex cases can take years (depending on the number 17 of bank accounts and volume of transactions). 18

19

#### PRELIMINARY RECOMMENDATIONS

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

23

## 1. <u>Document Recovery Efforts</u>

IV.

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

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2.

## **Receivership Asset Recovery Efforts and Investigation**

2 As appropriate, the Receiver will seek to locate any presently unaccounted for receivership assets that may exist. As part of her investigation, the Receiver is and 3 will continue to evaluate claims to pursue recovery of assets of the Receivership 4 5 Entities from third parties. With the exception of clawback claims, which the Court has already authorized, the Receiver will seek Court approval to pursue any such 6 claims. 7

8

#### 3. Accounting

9 As previously noted, the Receiver has filed her forensic accounting report, 10 which has helped, among other things, identify assets not already identified, identify potential clawbacks and other recoverable claims, and identify investors and the 11 money in-money out account balances associated with each of them. 12

V.

13

LAW OFFICES

#### **CONCLUSION**

14 Based upon the Receiver's preliminary investigation and findings, the Receiver recommends and requests that the Court order the Receiver to continue her 15 work pursuant to the orders issued by the Court. The Receiver also requests the 16 Court authorize her continuing investigation and approve this ninth report and 17 18 recommendations.

19 Dated: May 23, 2025 20 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP 21 By: */s/Edward G. Fates* 22 EDWARD G. FATES Attorneys for Court-Appointed 23 Receiver KRISTA L. FREITAG 24 25 26 27 28 Allen Matkins Leck Gamble Mallory & Natsis LLP -17-4905-4059-2966.1

# **EXHIBIT** A

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#### **Exhibit A - Schedule of Assets**

#### **Real Property Assets:**

AddressCity1865 E. RiverparkBoise29641 SultanaGarden City35963 N. HaciendaBoise47691 GracemoorLas Vegas52158 SummersweetBoise621 Isle of VeniceFort Lauderdale

#### State Description

ID	Attached Townhome
ID	Attached Townhome
ID	Single Family Residence
NV	Single Family Residence
ID	Commerical Condominium Storage Unit
FL	Condominium

#### Notes

Sale approved and closed. Sale approved and closed.

#### Personal Property - Autos:

	Make	Model
1	Toyota	Tundra
2	BMW	X3
3	Mercedes Benz	C63 Coupe
4	BMW	X5
5	BMW	M5
6	Mclaren	620R
7	Bentley	Continental
8	Aston Martin	DBS
9	Mercedes Benz	G Wagon
10	Mercedes Benz	S AMG
11	Lamborghini	Huracan
12	Ferrari	F8 Tributo
13	Ferrari	488 EVO
14	Kawasaki	Ninja
15	Ford	Mustang

Year	Notes	Status
2021	Surrendered by Hirschmann, in storage	Sold
2022	Surrendered by Hirschmann, in storage	Sold
2023	Surrendered by Campbell, in storage	Sold
2022	Surrendered by Hirschmann, in storage	Sold
2021	Surrendered by Hirschmann, in storage	Sold
2020	Surrendered by Hirschmann, in storage	Sold
2022	Surrendered by Hirschmann, in storage	
2019	Surrendered by Hirschmann, in storage	Sold after March 31, 2025
2022	Surrendered by Hirschmann, in storage	Sold
2020	Surrendered by Hirschmann, in storage	Sold
2022	Surrendered by Hirschmann, in storage	
2022	Surrendered by Hirschmann, in storage	
2020	Surrendered by Hirschmann, in storage	Sold
2022	Surrendered by Campbell, in storage	Sold
2019	Held by Campbell, believed to have no value due to outstanding auto loan secured by title to the vehicle.	

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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 StatueSold15 Standing Hours StatueSold16 Standing Knight StatueSold
- 17 Bugatti Car Statue Sold