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CONSTRUCTION LLC, BAGPIPE HOLDINGS LLC, BAGPIPE MULTIMEDIA LLC, TYLER CAMPBELL, INR CONSULTING LLC (CALIFORNIA ENTITY), HIDDEN SPRINGS HOLDINGS GROUP LLC, and ALEXANDRIA PORTER BOVEE aka "AIA MONTGOMERY", Relief Defendants.

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1	Krista Freitag ("Receiver"), the Court-appointed permanent receiver for
2	Defendant INTEGRATED NATIONAL RESOURCES, INC., DBA
3	WEEDGENICS, and Relief Defendants, WEST COAST DEVELOPMENT LLC,
4	INR CONSULTING LLC (WYOMING ENTITY), OCEANS 19 INC.,
5	AUTOBAHN PERFORMANCE LLC, ONE CLICK GENERAL MEDIA INC.,
6	OPUS COLLECTIVE, INR-CA INVESTMENT HOLDINGS, LLC, TOTAL
7	SOLUTION CONSTRUCTION LLC, BAGPIPE HOLDINGS LLC, BAGPIPE
8	MULTIMEDIA LLC, INR CONSULTING LLC (CALIFORNIA ENTITY), AND
9	HIDDEN SPRINGS HOLDINGS GROUP LLC, and their subsidiaries and affiliates
10	(collectively the "Receivership Entities" or individually, a "Receivership Entity")
11	hereby submits this Tenth Interim Report and Recommendations ("Tenth Interim
12	Report").
13	I. <u>BACKGROUND</u>
14	This equity receivership involves a large, complex, and wide-ranging group
15	of enterprises and assets which are the subject of the Complaint filed by the
16	Securities and Exchange Commission. This quarterly report covers the Receiver's
17	activities during the second quarter of 2025, including accounting information from
18	inception of the receivership on May 19, 2023 through June 30, 2025, and also
19	reflects the status of certain assets as of the date of this report, if material activity
20	has occurred between June 30, 2025 and the date of this report.
21	II. <u>EXECUTIVE SUMMARY</u>
22	In its Complaint, the Commission alleges that from June 2019 to April 2023,
23	defendants Williams and Hirschman, along with INR, raised approximately
24	\$61.7 million – including over \$22.4 million from November 2022 to April 2023 –
25	from approximately 350 investors nationwide. The Complaint alleges Defendants
26	lied about the existence of, revenue from, and permits associated with INR facilities
27	that supposedly cultivated cannabis in Adelanto, California and Las Vegas, Nevada.
28	The Complaint further alleges that Defendants fraudulently used investor funds to

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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.

The cooperation of the Defendants and Relief Defendants has been very limited, despite repeated requests for meetings and demands for turnover of assets, books and records. Nearly all 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 (resulting from the Receiver's review of third-party documentation) that she, through counsel, posed to Defendants and Relief Defendants. In other words, unless the Receiver identified them first and then demanded turnover thereof, assets have not been voluntarily disclosed and/or turned over to the Receiver. Defendant Williams has not responded to any requests for information, while Defendant Hirschmann and Relief Defendants Delgado and Campbell have asserted their Fifth Amendment rights. As it relates to digital records and assets (e.g., websites, emails, company phones/computers, and financial books and records), Defendants and Relief Defendants have provided minimal information. Through her own efforts, the Receiver was able to obtain control over Receivership Entity websites, email accounts (many of which were empty due to deletion) and limited financial information. The data available from these sources is largely incomplete, 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

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existence of and to date, provided for the Receiver's recovery of the following assets:

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

During the second quarter of 2025, the Receiver initiated the investor and creditor claims administration process approved during the first quarter of 2025 (order entered on March 13, 2025, Dkt. 335), continued pursuing the sale of the recovered assets, and continued pursuing and investigating 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, the monetization of the remaining personal property assets recovered to date, and the administration of claims and subsequent distributions to investors.

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 permitted for commercial mail receiving agencies like UPS Stores. Additionally, subpoenas, issued through counsel, were issued to electronic and accounting

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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).

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software vendors to recover records. Unfortunately, no substantial books or financial records related to the scheme were produced.

2. Funds Recovered to Date

The Receiver promptly notified each bank and known financial institution identified as having an account associated with the Receivership Entities. Through June 30, 2025, the Receiver recovered over \$8.0 million from bank accounts previously controlled by the defendants, legal retainers, a pre-receivership vehicle 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 the Commission but discovered by the Receiver). See below in the Receipts and Disbursements section for more detail.

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.

3. Real Property Assets Recovered to Date

As previously discussed, the Receiver confirmed possession of six (6) real 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 Order allowing for the marketing and sale of the assets, all real properties have been sold.

It should be noted that the Hacienda and Summersweet properties included overbidders who, collectively, materially improved the sale prices of the assets.

Regarding the Hacienda Property, the Receiver, with the assistance of the Commission and the Small Business Administration ("SBA") successfully resolved a lien on the property related to Defendant Hirschmann's personal debt. This lien had resulted in a holdback of net sale proceeds at the closing of \$526,000. In May

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2025, the SBA accepted a nominal payment of \$5,000, allowing the Receiver to 1

recover \$521,000 previously held in escrow.

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In addition to the real property, the Receiver noted dozens of vehicle purchases by Receivership Entities or with funds raised from investors. To date, the Receiver identified 13 vehicles owned by Autobahn, all but one were recovered from Defendant Hirschman. Almost immediately after the TRO was entered on May 19, 2023, Hirschmann sold a Maserati automobile for \$170,000 cash (about half of what Autobahn had purchased it for six months earlier). The Receiver was able to recover \$170,000, which Hirschmann had instructed the buyer to wire to a criminal defense law firm. Further recovery from the fraudulent transfer of the 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 transaction.

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

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.

As previously discussed, the Receiver signed a listing agreement with a reputable asset disposition firm and marketing of the vehicles is ongoing. During

the second quarter of 2025, one vehicle sold (the Aston Martin DBS). To date, eleven (11) vehicles have sold. The remaining three (3) unsold vehicles are exotic and higher end luxury vehicles, which are expected to take more time to sell. Offers continue to come in, are negotiated, and the pricing for the vehicles is regularly adjusted to reflect current market values.

Also, the Receiver identified hundreds of thousands of dollars of jewelry 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 likewise pursuing avenues to sell the jewelry. In the third quarter of 2024, an appraisal was commissioned to estimate both the insurance and fair market value of the jewelry. For insurance purposes, the jewelry retained its value. Unfortunately, the fair market value for jewelry is highly subjective and the appraiser determined that in an auction or subsequent sale, that the items would likely sell for only a fraction of the original retail price. Previously the Receiver, reached out to various consignment and auction sellers for opinions on value and to determine the best strategy for the sale of these items. These sellers noted a highly softening market for jewelry and that individual tastes and preferences will greatly influence the marketability for these items. Accordingly, it was determined an individual approach to each item would likely yield a higher value than coordinating all items with one consignment seller.

Efforts to identify, locate and recover additional jewelry, luxury goods, artwork and other valuable personal property have been ongoing. The Receiver attempted to recover another undisclosed valuable piece of art from Defendant Hirschmann, which the Receiver discovered was purchased by Oceans 19. Defendant Hirschmann, however, claims that the piece was destroyed while moving from the Hacienda property and that it was thrown in the trash. Hirschmann was 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

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schedule detailing the assets collected to date, including real property, automobiles, jewelry and artwork along with notes on their present status.

5. Real and Personal Property Insurance

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

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. Coverage for

the jewelry has been placed at a nominal cost in anticipation of the sales efforts.

6. Other Investments and Loans

After reviewing the banking records and then documents and information produced by the web hosting company in response to her subpoena, the Receiver discovered an operating business owned by Raw Sports, LLC (a Hirschmann controlled entity), which had recently purchased Rari Nutrition ("Rari"). Rari was a nutritional supplements company largely sold through the Amazon.com website, but also through its own website at rarinutrition.com.² Through various subpoenas, the Receiver confirmed that Raw Sports, LLC dba Rari was an existing operating business that Hirschmann purchased through Raw Sports, LLC, just prior to the 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 operations over to the Receiver. An experienced Amazon.com operations team was operating the virtual storefront, along with existing product, which consisted of various health/exercise supplements. The Receiver worked with the operations team and continued to gather information regarding the business to support its operations (from manufacturing of product inventory to warehouse inventory to insurance). Unfortunately, the prior net losses reported, the limited revenue activity and

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complete lack of cooperation by the manufacturer of the supplements has led to a wind down of operations. The Receiver also did discover that the intellectual property associated with the business (e.g., the trademark) had lapsed and was not recoverable by the Receiver (the window had passed prior to the Receiver's appointment).

7. **Digital Records**

With limited cooperation from the Defendants and Relief Defendants, the Receiver has worked to identify payments linked to the Receivership Entities and secure their business records. Subpoenas were issued to key vendors, including internet service providers and website hosts, requiring them to preserve all relevant documents. Initially, the Receiver took control of six (6) primary domains and nine (9) add-on domains, later expanding to 47 domains. However, 34 domains were "parked" or did not have a website or email account associated with them. 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 redirect traffic to www.INRreceivership.com. To preserve assets, the Receiver has maintained domain renewals while transitioning parked domains to a lower-cost option.

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

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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. 8. **Receipts and Disbursements**

Finally, the Receiver also worked to identify payments to accounting

The following reflects the cash activity of the receivership estate for the period from May 19, 2023, through June 30, 2025. A summary of the receipts and disbursements is as follows:

Total Bank Account Balances at takeover	\$6,541,700
Additional Williams-Related Bank Account Recovery	\$14,164
Hirschmann Withdrawal Recovery	\$1,128,921
Legal Retainer Recovery	\$376,086
Maserati Settlement Recovery	\$42,000
Vehicle Deposit Recovery	\$30,000
Interest Income	\$436,742
Parking Lease Income	\$500
Raw Sports Net Operating Revenue	\$49,124
Personal Property Sale Proceeds (Art and Jewelry)	\$6,500
Sultana Property Net Sale Proceeds	\$688,732
River Park Net Sale Proceeds	\$632,867

\$1,621,432

Hacienda Net Sale Proceeds³

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CASH BALANCE AT JUNE 30, 2024	\$13,038,83
TOTAL DISBURSEMENTS	(\$2,841,480
Receivership Legal Fees and Expenses	(\$957,120
Receiver Fees and Expenses	(\$1,224,982
expenses)	
(primarily includes asset search related	(\$77,353
General Receivership Expenses	
insurance)	
transportation, security, storage,	(\$280,294
Vehicle Expenses (e.g., repossession,	
insurance)	
HOA monthly dues, property taxes,	(\$258,279
Real Property Related Expenses (e.g.,	
Raw Sports Operating Expenses	(\$43,452
TOTAL RECEIPTS	\$15,880,31
Vehicle Sale Net Sale Proceeds	\$1,111,50
Isle of Venice Net Sale Proceeds	\$1,990,55
Summersweet Net Sale Proceeds	\$202,43
Gracemoor Net Sale Proceeds	\$1,007,06
Gracemoor Net Sale Proceeds	\$1,007,0

As of June 30, 2025, outstanding checks totaled \$8,125, thus the actual bank balance as of June 30, 2025, was \$13,046,956.

Investor Communications 9.

Upon entry of the TRO, the Receiver promptly established a dedicated web page with a link to same on the Receiver's company's website which is used to

³ This now includes \$521,000 previously in an escrow holdback.

provide case information, regular updates, and answers to frequently asked questions to investors. The Internet address for the webpage is www.INRreceivership.com. The Receiver is also maintaining a dedicated e-mail address and telephone line for all inquiries.

10. Claims Process

On February 4, 2025, the Receiver filed her Motion for Order: 1) Approving Procedures for the Administration of Claims against the Receivership Estate, 2) 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 13, 2025 (Dkt. No. 335). During the fourth quarter of 2024 and first quarter of 2025, the Receiver and her team worked to review underlying investor records to necessarily determine whether related prospective claimant's investment transactions are to be aggregated or not. Requesting and performing this review of investor records was done to expedite the claims review and reconciliation process after claims are received back from prospective claimants.

Ultimately, pursuant to the 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 record review, and sent those forms to prospective claimants on or before the April 21, 2025 deadline to do so. All but a small number of claimants responded to the claims letters and emails prior to the June 20, 2025 deadline. The Receiver has begun to review the submitted claims and will notify all investors of any deficiencies in their respective claims by September 18, 2025; further statistics regarding the claims process will be provided in the next quarterly report. A motion seeking to approve claim treatments, distribution methodology, and a proposed distribution plan is due to be filed by November 17, 2025.

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11. Forensic Accounting

During the fourth quarter of 2024, the Receiver and her team completed the Court-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 Receivership Entities which are associated with revenue generating cannabis operations, but did find *material* amounts of credit card payments, payments to numerous (unexplained) non-investor individuals and entities (mentioned above), payments to investors, cash withdrawals, real and personal property purchases (discussed above), real property renovation/improvement related expenses, and other personal affect-type transactions. The forensic accounting efforts have been 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 ultimately the distribution process.

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 her counsel, has issued numerous subpoenas to gather banking records (as discussed above) and is using a project-specific and cost-effective AI software to upload the tens of thousands of banking transactions into a database. This software saved considerable time and expense and shortened the time required to complete the accounting, which in some complex cases can take years (depending on the number of bank accounts and volume of transactions).

IV. <u>PRELIMINARY RECOMMENDATIONS</u>

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.

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

The Receiver will continue to obtain records from all available sources identified and associated with the Receivership Entities, including all financial

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EXHIBIT A

Exhibit A - Schedule of Assets

Real Property Assets:

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

Personal Property - Autos:

	Make	Model	Year	Notes	Status
1	Toyota	Tundra		Surrendered by Hirschmann, in storage	Sold
2	BMW	Х3	2022	Surrendered by Hirschmann, in storage	Sold
3	Mercedes Benz	C63 Coupe	2023	Surrendered by Campbell, in storage	Sold
4	BMW	X5	2022	Surrendered by Hirschmann, in storage	Sold
5	BMW	M5	2021	Surrendered by Hirschmann, in storage	Sold
6	Mclaren	620R	2020	Surrendered by Hirschmann, in storage	Sold
7	Bentley	Continental	2022	Surrendered by Hirschmann, in storage	
8	Aston Martin	DBS	2019	Surrendered by Hirschmann, in storage	Sold
9	Mercedes Benz	G Wagon	2022	Surrendered by Hirschmann, in storage	Sold
10	Mercedes Benz	S AMG	2020	Surrendered by Hirschmann, in storage	Sold
11	Lamborghini	Huracan	2022	Surrendered by Hirschmann, in storage	
12	Ferrari	F8 Tributo	2022	Surrendered by Hirschmann, in storage	
13	Ferrari	488 EVO	2020	Surrendered by Hirschmann, in storage	Sold
14	Kawasaki	Ninja	2022	Surrendered by Campbell, in storage	Sold
15	Ford	Mustang	2019	Held by Campbell, believed to have no value due to outstanding auto loan secured by title to the vehicle.	

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

1 Breitling Emergency Mission men's war	ng Emergenc	Mission men	's watch
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- 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 StatueSold17 Bugatti Car StatueSold