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

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15

16 SECURITIES AND EXCHANGE
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

**DECLARATION OF KRISTA L.
FREITAG IN SUPPORT OF
MOTION FOR APPROVAL OF
SETTLEMENT WITH MYSTIC
ENTITIES AND MIGUEL ROACHO**

Date: July 10, 2026
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",

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9 Relief Defendants.
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1 I, Krista L. Freitag, declare as follows:

2 1. I am the permanent receiver for Defendant Integrated National
3 Resources, Inc. d/b/a WeedGenics (“INR”), and Relief Defendants West Coast
4 Development LLC, INR Consulting LLC (Wyoming entity), Oceans 19 Inc.,
5 Autobahn Performance LLC, One Click General Media Inc., Opus Collective, INR
6 Consulting LLC (California entity), Hidden Springs Holdings Group LLC, Total
7 Solution Construction LLC, Bagpipe Holdings LLC, Bagpipe Multimedia LLC, and
8 INR-CA Investment Holdings, LLC, and their subsidiaries and affiliates
9 (collectively, the “Receivership Entities”). I make this declaration in support of my
10 Motion for Approval of Settlement with Mystic Entities and Miguel Roacho
11 (“Motion”). I have personal knowledge of the facts set forth herein and, if called as
12 a witness, could and would competently testify to such facts under oath.

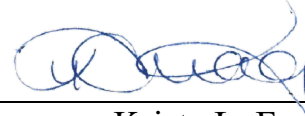
13 2. As discussed in the Motion, the Mystic Entities and Roacho made
14 statutory offers of judgment in the amount of \$150,000 and \$5,000, respectively.
15 I’m advised that the effect of these offers of judgment is to expose the receivership
16 estate to a potential award of attorneys’ fees in favor of the Mystic Entities and
17 Roacho if I declined the offers and failed to secure a judgment in the case in excess
18 of the amounts offered. For the reasons laid out in my Motion for Authority, Dkt.
19 389-1 (and the Complaint against the Mystic Entities and Roacho itself), I believed
20 the case was likely to result in a judgment or settlement substantially larger than
21 \$155,000, and therefore did not accept the statutory offers.

22 3. I continue to believe the receivership estate’s claims against the Mystic
23 Entities and Roacho are strong. However, the Nevada Court’s surprising adverse
24 ruling granting summary judgment makes the path forward on those claims very
25 challenging and risky. I’m advised that not only is the likelihood of overcoming the
26 ruling very limited (reconsideration is rarely granted and civil appeals are successful
27 only about 10% to 20% of the time), but the receivership estate would also be
28 exposed to a potential award of attorneys’ fees and costs (which amount would

1 continue to grow) incurred by the Mystic Entities and Roacho (in addition to my
2 fees and costs and those of my counsel) if the ruling is affirmed. Considering all the
3 above, I believe the settlement, although well less than what was hoped for, is in the
4 best interests of the receivership estate.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed on June 9, 2026, at Victoria, Kansas.

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Krista L. Freitag