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20 Attorneys for Receiver  
 21 KRISTA FREITAG

22 UNITED STATES DISTRICT COURT  
 23 SOUTHERN DISTRICT OF CALIFORNIA

24 SECURITIES AND EXCHANGE  
 25 COMMISSION,

26 Plaintiff,

27 v.

28 GINA CHAMPION-CAIN and ANI  
 DEVELOPMENT, LLC,

Defendants,

AMERICAN NATIONAL  
 INVESTMENTS, INC.,

Relief Defendant.

Case No. 3:19-cv-01628-LAB-AHG

**RECEIVER'S ACCOUNTING OF  
 COSTS OF SALE OF 809 SAN  
 RAFAEL PLACE PROPERTY**

Mag. Judge: Hon. Allison H. Goddard

1 Krista Freitag ("Receiver"), the Court-appointed permanent receiver for  
 2 Defendant ANI Development, LLC, Relief Defendant American National  
 3 Investments, Inc., and their subsidiaries and affiliates ("Receivership Entities"),  
 4 hereby submits this accounting of costs of sale of the 809 San Rafael Place Property.

5 As part of its Order (1) Granting Request to Approve Sale of 809 San Rafael  
 6 Place Property to Winning Bidder; and (2) Granting in Part and Denying in Part  
 7 Motion for Approval of Sale of 809 San Rafael Place Property ("Sale Approval  
 8 Order"), the Court instructed the Receiver to provide a full accounting of sale costs,  
 9 property taxes paid, the precise amount used to pay the release price for the property  
 10 to Axos Bank, and the amount ultimately returned to the receivership estate from the  
 11 sale proceeds. Dkt. 449. The Receiver paid a total of \$7,383.32 for title, recording,  
 12 transfer, and other fees associated with this sale. The summary breakdown of the  
 13 purchase price proceeds is as follows:

14	Sale Price	\$1,630,000.00
15	Axos Bank Payment	(\$1,313,047.38)
16	Sales Commission	(\$52,750.00)
17	Property Taxes	(\$3,857.75)
18	Closing Costs	(\$7,383.32)
19	<b>Net Sales Proceeds</b>	<b>\$252,961.55</b>
20		

21 Also, as provided in the Sale Approval Order, amount of \$635,000 in  
 22 receivership estate funds has been set aside by the Receiver and will not be  
 23 distributed until such time as the claims asserted by James Lance on behalf of  
 24 Con & Coop Beach Rentals, LLC have been either settled (with the settlement  
 25 approved by the Court) or resolved by the Court.

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1 Dated: September 21, 2020

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

By:           s/Edward G. Fates          

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