

1 DAVID R. ZARO (BAR NO. 124334)
NORMAN M. ASPIS (BAR NO. 313466)
2 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
3 865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
4 Phone: (213) 622-5555
Fax: (213) 620-8816
5 E-Mail: dzaro@allenmatkins.com
naspis@allenmatkins.com

6 EDWARD G. FATES (BAR NO. 227809)
7 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
8 One America Plaza
600 West Broadway, 27th Floor
9 San Diego, California 92101-0903
Phone: (619) 233-1155
10 Fax: (619) 233-1158
E-Mail: tfates@allenmatkins.com

11 Attorneys for Receiver
12 KRISTA FREITAG

13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA

15
16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 v.

19 GINA CHAMPION-CAIN and ANI
20 DEVELOPMENT, LLC,

21 Defendants,

22 AMERICAN NATIONAL
23 INVESTMENTS, INC.,

24 Relief Defendant.
25
26
27
28

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

**RECEIVER'S ACCOUNTING OF
COSTS OF SALE OF
737 WINDEMERE COURT
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 737 Windemere Court
 5 Property.

6 As part of its Order Granting Receiver's Motion for Approval of Sale of
 7 737 Windemere Court Property ("Sale Approval Order"), the Court instructed the
 8 Receiver to provide a full accounting of sale costs, property taxes paid, the precise
 9 release price paid to Axos Bank, and the amount ultimately returned to the
 10 receivership estate from the sale proceeds. Dkt. 434. The Receiver paid a total of
 11 \$6,943.53 for title, recording, transfer, and other fees associated with this sale. The
 12 summary breakdown of the purchase price proceeds is as follows:

| | | |
|----|----------------------------------|-----------------------|
| 13 | Sale Price | \$1,515,000.00 |
| 14 | Axos (lender) Payment | (\$142,887.72) |
| 15 | Sales Commission | (\$12,000.00) |
| 16 | Property Taxes | (\$4,110.84) |
| 17 | Closing Costs and Other Expenses | (\$6,943.53) |
| 18 | Net Sales Proceeds | \$1,349,057.91 |

19
 20 Dated: November 11, 2020

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

21 By: s/Edward G. Fates

22 DAVID R. ZARO
 23 EDWARD G. FATES
 24 NORMAN M. ASPIS
 Attorneys for Receiver
 KRISTA FREITAG

25
 26
 27
 28