

1 DAVID R. ZARO (BAR NO. 124334)
MARK R. HARTNEY (BAR NO. 136824)
2 MATTHEW D. PHAM (BAR NO. 287704)
ALLEN MATKINS LECK GAMBLE
3 MALLORY & NATSIS LLP
865 South Figueroa Street, Suite 2800
4 Los Angeles, California 90017-2543
Phone: (213) 622-5555
5 Fax: (213) 620-8816
E-Mail: dzaro@allenmatkins.com
6 mhartney@allenmatkins.com
mpham@allenmatkins.com

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

12 Attorneys for Receiver
13 KRISTA L. FREITAG

14 UNITED STATES DISTRICT COURT
15 SOUTHERN DISTRICT OF CALIFORNIA
16

17 SECURITIES AND EXCHANGE
COMMISSION,

18 Plaintiff,

19 v.

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

22 Defendants,

23 AMERICAN NATIONAL
24 INVESTMENTS, INC.,

25 Relief Defendant.

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

**TENTH INTERIM FEE
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS LLP,
GENERAL COUNSEL TO THE
RECEIVER, KRISTA L. FREITAG,
FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

Date: April 10, 2023
Time: 11:30 a.m.
Courtroom: 14A
Judge: Hon. Larry A. Burns

TABLE OF CONTENTS

		<u>Page</u>
1		
2		
3	I. INTRODUCTION.....	4
4	II. SUMMARY OF TASKS PERFORMED AND COSTS	
5	INCURRED.....	6
6	A. Categories and Descriptions of Work.....	6
7	1. General Receivership.....	6
8	2. Asset Investigation & Recovery.....	6
9	3. Reporting.....	7
10	4. Operations & Asset Sales.....	7
11	5. Claims & Distributions.....	7
12	6. Third Party Recoveries.....	9
13	7. Pending Litigation.....	9
14	8. Employment/Professional Fees.....	9
15	9. General Clawback Claims & Settlements.....	10
16	10. Claims Against Kim Peterson.....	10
17	A. Summary of Expenses Requested for Reimbursement.....	10
18	II. THE FEES AND COSTS ARE REASONABLE AND SHOULD	
19	BE ALLOWED.....	11
20	III. CONCLUSION.....	13

20
21
22
23
24
25
26
27
28

TABLE OF AUTHORITIES**Page(s)****Cases**

<i>Gaskill v. Gordon</i> , 27 F.3d 248 (7th Cir. 1994).....	11
<i>In re Imperial 400 Nat'l, Inc.</i> , 432 F.2d 232 (3d Cir. 1970).....	12
<i>SEC v. Elliot</i> , 953 F.2d 1560 (11th Cir. 1992).....	11
<i>SEC v. W.L. Moody & Co., Bankers (Unincorporated)</i> , 374 F. Supp. 465 (S.D. Tex. 1974)	12
<i>United States v. Code Prods. Corp.</i> , 362 F. 2d 669 (3d Cir. 1966).....	11

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
 2 general counsel to Krista L. Freitag (the "Receiver"), the Court-appointed receiver
 3 for ANI Development, LLC, American National Investments, Inc. ("ANI"), and
 4 their respective subsidiaries and affiliates (the "Receivership Entities"), hereby
 5 submits this Tenth Interim Application for Payment of Fees and Reimbursement of
 6 Expenses (the "Application"). This Application covers the six-month period from
 7 July 1, 2022 through December 31, 2022 (the "Application Period"), and seeks
 8 approval of \$493,955.55 in fees and \$21,582.59 in expenses, and an order
 9 authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred
 10 (\$395,164.44) and 100% of the expenses incurred (\$21,582.59).

11 The Receiver and Allen Matkins have previously filed fee applications on a
 12 quarterly basis, with the exception of the last two. This fee application, like the last
 13 two, covers a *six-month period* in order to continue to catch up, such that, going
 14 forward, fee applications can be reviewed closer in time to when the work they
 15 cover was actually performed.

16 **I. INTRODUCTION.**

17 This equity receivership involves a large, complex, and wide-ranging group
 18 of enterprises and assets associated with the Ponzi scheme that is the subject of the
 19 Complaint filed by the Securities and Exchange Commission ("Commission"). The
 20 Receiver was appointed on September 3, 2019. Dkt. 6.

21 The ordering appointing the Receiver confers broad duties, responsibilities,
 22 and powers upon the Receiver, which are designed to allow her to secure, preserve,
 23 and protect the assets of the Receivership Entities, conduct a forensic accounting
 24 and analysis of the Receivership Entities' financial transactions, investigate and
 25 recover sums transferred to third parties, review and analyze investor and creditor
 26 claims, and maximize the amount ultimately available for distribution to investors
 27 and creditors. *Id.* The Receiver determined that experienced and qualified counsel
 28 was critical to the performance of her duties and obligations under the Appointment

Order due to the size and complexity of the receivership estate. Accordingly, the Receiver engaged Allen Matkins to assist with legal issues facing the receivership estate.

This Application should be read in conjunction with the Receiver's Thirteenth and Fourteenth Interim Reports and Recommendations, filed on December 14, 2022 and March 10, 2023 (Dkt. 930, 966), which describe in detail the Receiver's activities during the six-month Application Period.

This Application seeks approval of \$493,955.55 in fees for a total of 781.20 hours worked, and payment on an interim basis of 80% of that amount, or \$395,164.44. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**¹ and is broken down into the following categories:

Category	Hours	Amount
General Receivership	9.00	\$6,196.50
Asset Investigation & Recovery	17.40	\$13,585.50
Reporting	4.90	\$3,497.85
Operations & Asset Sales	1.40	\$963.90
Claims & Distributions	153.10	\$112,757.85
Third Party Recoveries	31.20	\$20,041.20
Pending Litigation	1.30	\$895.05
Employment/Professional Fees	2.90	\$1,996.65
General Clawback Claims & Settlements	469.70	\$288,762.30
Claims Against Kim Peterson et al.	90.30	\$45,258.75
Total Fees	781.20	\$493,955.55

¹ While Allen Matkins has made efforts to ensure that its billing entries are consistent across categories, certain activities lend themselves to more than one category, or may be difficult to categorize. In any event, **Exhibit A** reflects the actual time spent by Allen Matkins personnel, and contains accurate descriptions of the services rendered.

Allen Matkins' work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets. Because the firm has worked diligently and efficiently to assist the Receiver in carrying out her Court-ordered duties, it should be compensated on an interim basis for its work.

II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.

A. Categories and Descriptions of Work.

1. General Receivership.

Allen Matkins' work in this category relates to the related criminal cases against Gina Champion-Cain and Cris Torres, including communications with the United States Attorney's Office and counsel for Gina Champion-Cain ("GCC") regarding restitution issues and attending the hearing on restitution held on August 31, 2022. Allen Matkins also advised the Receiver regarding inquiries about the receivership from the media and assisted in responding to inquiries about the case from the California Department of Insurance. The reasonable and necessary fees for Allen Matkins' work in this category total \$6,196.50.

2. Asset Investigation & Recovery.

The services in this category relate generally to efforts to identify, secure, preserve, investigate and recover receivership assets. During the Application Period, these services focused on (a) evaluating and advising the Receiver regarding rights, remedies, and potential steps to enforce the outstanding loan issued by ANI to Illa Designs (aka Dash Wagon), and (b) analyzing and advising the Receiver on issues regarding trademarks held by the Receivership Entities. Allen Matkins recently assisted the Receiver in negotiating a settlement with Illa Designs and its owners, which is expected to generate a recovery for the estate of between \$235,000 and \$265,000. The reasonable and necessary fees for Allen Matkins' work in this category total \$13,585.50.

1 3. Reporting.

2 Allen Matkins' services in this category focus on assisting the Receiver in
3 preparing her Twelfth and Thirteenth Interim Reports and Recommendations, which
4 were filed on September 2, 2022 and December 14, 2022, respectively. Dkt. 883,
5 930. The reports includes detailed summaries of the Receiver's activities, funds
6 recovered, real and personal property assets, property taxes, insurance, loans and
7 other investments, investigation of third party claims, pending litigation, and other
8 matters. The reports also detail the receipts and disbursements for the receivership
9 estate since the Receiver's appointment and provides her recommendations for the
10 continued administration of the receivership. The reasonable and necessary fees for
11 Allen Matkins' work in this category total \$3,497.85.

12 4. Operations & Asset Sales.

13 Allen Matkins' time in this category relates to assisting the Receiver with the
14 sale of a liquor license associated with a former Patio Marketplace restaurant. The
15 reasonable and necessary fees for Allen Matkins' work in this category total
16 \$962.90.

17 5. Claims & Distributions.

18 Services rendered in this category focus on the process of securing Court
19 approval of proposed allowed amounts of claims against the receivership estate and
20 the proposed plan for distributing receivership estate funds ("Distribution Plan").
21 During the Application Period, this work focused on responding to the various
22 objections to the Receiver's motion for approval of proposed allowed amounts of
23 claims and her proposed Distribution Plan ("Claims Allowance and Distribution
24 Motion"). Objections to the Claims Allowance and Distribution Plan Motion were
25 filed by CalPrivate Bank, the Wakefield Parties (including 2Budz Holdings), entities
26 controlled by Kim Peterson, Chicago Title Company, and the Heller-Fenley group
27 of investors. Allen Matkins assisted the Receiver in preparing an omnibus reply
28 brief that addressed each of these objections, as well as a supporting declaration

1 from the Receiver. Dkt. 853, 853-1. The firm also assisted the Receiver in
2 responding to evidentiary objections filed by CalPrivate Bank and in preparing
3 evidentiary objections to declarations filed by CalPrivate Bank. Attorney Ted Fates
4 attended the hearing on the Claims Allowance and Distribution Motion held on
5 August 31, 2022.

6 After the hearing was held, Allen Matkins assisted the Receiver in responding
7 to a motion by Kim Funding for further oral argument (Dkt. 889) and in preparing a
8 supplemental brief addressing the issue of equitable indemnity (Dkt. 893). The firm
9 also assisted in preparing a response to Kim Funding's supplemental brief regarding
10 its disputed claims. Dkt. 922.

11 Allen Matkins further assisted the Receiver in analyzing and preparing an
12 opposition to the motion filed by Nossaman LLP for relief from the Court's
13 preliminary injunction to file suit against ANI Development, LLC to assert an
14 equitable indemnity claim against the receivership estate. Dkt. 854. The firm also
15 advised and assisted the Receiver with respect to settlement communications with
16 CalPrivate Bank regarding its disputed claim in the receivership, opposition to the
17 Chicago Title Global Settlement and associated bar order, prospective appeal and
18 request for stay pending appeal, and claims against Kim Peterson's irrevocable trust.

19 Allen Matkins assisted with gathering information from counsel for investors
20 and related third parties regarding settlement payments made to investors that
21 required adjustments to be made to the Receiver's proposed allowed claim amounts
22 and prior recovery rates for purposes of the Rising Tide distribution method. The
23 firm also assisted the Receiver with issues related to disseminating information
24 about the receivership to investors and creditors, including information provided on
25 the receivership website (www.anireceivership.com). The reasonable and necessary
26 fees for Allen Matkins' work in this category total \$112,757.85.

27

28

1 6. Third Party Recoveries.

2 This portion of the Application pertains to work on claims against third
3 parties to recover amounts for the benefit of the receivership estate. Due to the
4 confidential nature of the legal work on these matters and the Receiver's litigation
5 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
6 to file this portion of the Application under seal. The reasonable and necessary fees
7 for Allen Matkins' work in this category total \$20,041.20.

8 7. Pending Litigation.

9 Services performed in this category include the analysis and management of
10 pending pre-receivership actions in which one or more of the Receivership Entities
11 are parties. Specifically, work within this category relates to the action that was
12 pending in San Diego Superior Court known as *Luu v. The Patio Restaurant*
13 *Grp., LLC, et al.*, San Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL,
14 which was a putative class action filed by a former employee (which action was
15 stayed pursuant to the litigation stay in the Appointment Order). The action has
16 since been voluntarily dismissed. The reasonable and necessary fees for Allen
17 Matkins' work in this category total \$895.05.

18 8. Employment/Professional Fees

19 Although fee applications are a necessary component of federal equity
20 receiverships, neither the Receiver nor her professionals charge for time spent
21 preparing their own detailed applications. Allen Matkins assisted in preparing the
22 Receiver's Eighth Interim Fee Application (covering six months of work) and with
23 meet and confer communications with counsel for the Commission. The fee
24 application was filed on September 20, 2022, and approved on January 25, 2023.
25 Dkt. 907, 944. The reasonable and necessary fees for Allen Matkins' work in this
26 category total \$1,996.65.

27

28

1 9. General Clawback Claims & Settlements.

2 This portion of the Application pertains to work on clawback claims against
3 third parties and settlements to recover amounts for the benefit of the receivership
4 estate. Due to the confidential nature of the legal work on these matters and the
5 Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion
6 concurrently herewith to file this portion of the Application under seal. The
7 reasonable and necessary fees for Allen Matkins' work in this category total
8 \$288,762.30. To date, the Receiver has recovered more than \$8.5 million for the
9 receivership estate through the pursuit of clawback claims.

10 10. Claims Against Kim Peterson.

11 This portion of the Application pertains to work on claims against Kim
12 Peterson and his entities to recover amounts for the benefit of the receivership
13 estate. Due to the confidential nature of the legal work on this matters and the
14 Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion
15 concurrently herewith to file this portion of the Application under seal. The
16 reasonable and necessary fees for Allen Matkins' work in this category total
17 \$45,258.75. Kim Peterson and his entities, collectively, are the largest net winner in
18 the Ponzi scheme, having received more in \$12.7 million in net profits.

19 A. **Summary of Expenses Requested for Reimbursement.**

20 Allen Matkins requests that the Court approve reimbursement of \$21,582.59
21 in out-of-pocket costs. The itemization of such expenses is summarized below by
22 billing category.

23
24
25
26
27
28

Category	Total
Deposition/Court Transcript Fees	\$3,688.45
Messenger/FedEx Fees	\$207.43
Service of Process	\$1,764.20
Recordation Fees	\$94.00
Court/Filing Fees	\$15.00
Duplication	\$257.10
PACER/Document Research	\$1,219.67
E-Discovery	\$14,336.74
Total	\$21,582.59

II. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED.

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and her professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and her professionals are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving

1 the "economy of administration, the burden that the estate may be able to bear, the
 2 amount of time required, although not necessarily expended, and the overall value of
 3 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
 4 1970). Regardless of how this balancing test is formulated, no single factor is
 5 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 6 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
 7 Supp. 465, 480 (S.D. Tex. 1974).

8 As a preliminary matter, the Appointment Order confers on the Receiver
 9 substantial duties and powers, including to conduct such investigation and discovery
 10 as may be necessary to locate and account for all Receivership Assets, to take such
 11 action as is necessary and appropriate to assume control over and preserve
 12 Receivership Assets, and to employ attorneys and others to investigate and, where
 13 appropriate, institute, pursue, and prosecute all claims and causes of action of
 14 whatever kind and nature. *See* Appointment Order, Section X.

15 The Receiver promptly determined that experienced, qualified counsel was
 16 necessary due to the size and complexity of the receivership estate and the Court
 17 agreed, approving Allen Matkins' employment, initially on a provisional basis and
 18 then on a non-provisional basis. Dkt. 126, 309. The Court also previously approved
 19 the Receiver's proposal to file interim reports and fee applications on a quarterly
 20 basis. Dkt. 126. As noted above, this interim application covers two quarters of
 21 work.

22 Allen Matkins has submitted a detailed fee application which describes the
 23 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
 24 staff matters as efficiently as possible while remaining cognizant of the complexity
 25 of issues presented. As noted above, the request for fees is based on Allen Matkins'
 26 customary billing rates charged for comparable services provided in other matters,
 27 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
 28 4.50 hours of work (\$2,310.75 in fees).

1 The work performed by Allen Matkins was essential to carrying out the
 2 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
 3 diligently since the Receiver's appointment to preserve and protect the assets of the
 4 receivership estate, maximize the funds available for ultimate distribution to
 5 victims, and carry out the Receiver's other duties pursuant to the Appointment
 6 Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an
 7 interim basis in recognition of the fact that its work in assisting the Receiver is
 8 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion
 9 of the receivership. Allen Matkins' fees are fair and reasonable and should be
 10 approved and paid on an interim basis.

11 **III. CONCLUSION.**

12 Allen Matkins therefore respectfully request that this Court enter an Order:

- 13 1. Approving Allen Matkins' fees of \$493,955.55;
- 14 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 15 \$395,164.44, from the assets of the Receivership Entities;
- 16 3. Approving Allen Matkins' costs in the amount of \$21,582.59, and
 17 authorizing and directing the Receiver to reimburse such costs in full; and
- 18 4. For such other and further relief as the Court deems appropriate.

19 Dated: March 10, 2023

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

21 By: s/Edward G. Fates

22 DAVID R. ZARO
 23 EDWARD G. FATES
 24 MATTHEW D. PHAM
 Attorneys for Receiver
 KRISTA FREITAG

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
Exhibit A	Detailed Descriptions of Services Rendered	15

EXHIBIT A

EXHIBIT A

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 378827.00002

Client Name: Krista Freitag, as Receiver for ANI Deve

Date of Last Billing: 02/13/23

Matter Name: SEC v. Champion-Cain - General Receivers

Proforma Number: 1202924

Client/Matter Joint Group # 378827-1

Client Matter Number:

Fees for Matter 378827.00002.(SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/07/22	8890764	Analyze and advise Receiver on responses to further media inquiries concerning the case and receivership assets	Fates, Edward (Ted)	0.60	413.10	413.10	WO	HD	TR
07/12/22	8891563	Advise Receiver re: responses to further media inquiries	Fates, Edward (Ted)	0.20	137.70	550.80	WO	HD	TR
07/25/22	8903372	Assist Receiver with responses to media inquiries regarding receivership assets	Fates, Edward (Ted)	0.30	206.55	757.35	WO	HD	TR
08/15/22	8928188	Communications with AUSA regarding criminal restitution issues	Fates, Edward (Ted)	0.40	275.40	1,032.75	WO	HD	TR
08/23/22	8936105	Communications with AUSA regarding criminal restitution hearing set for 8/29 (.2) advise Receiver re: responses to further media inquiries (.2) advise Receiver re: vendor charges for computer forensic work (.3)	Fates, Edward (Ted)	0.70	481.95	1,514.70	WO	HD	TR
08/24/22	8939931	Communications with AUSA and Receiver regarding information requested for proposed restitution order	Fates, Edward (Ted)	0.80	550.80	2,065.50	WO	HD	TR

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Fees for Matter 378827.00002.(SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/25/22	8939324	Advise Receiver re: overcharges by vendor and issues re: same	Fates, Edward (Ted)	0.30	206.55	2,272.05	WO	HD	TR	_____
08/29/22	8941884	Communications with AUSA regarding criminal restitution issues (.2) review proposed restitution orders and attachments (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	481.95	2,754.00	WO	HD	TR	_____
08/31/22	8945666	Attend hearing on restitution in related criminal cases (.7) assist Receiver with responses to media inquiries (.7) communications with SEC counsel on issues relating to disgorgement from Champion-Cain (.2) analyze media article on case and projected recoveries for investors, discuss same with Receiver (.2)	Fates, Edward (Ted)	1.80	1,239.30	3,993.30	WO	HD	TR	_____
10/11/22	8991323	Respond to inquiries from CA state insurance regulator	Fates, Edward (Ted)	0.50	344.25	4,337.55	WO	HD	TR	_____
10/21/22	9001292	Respond to inquiries from CA insurance regulatory agency	Fates, Edward (Ted)	0.20	137.70	4,475.25	WO	HD	TR	_____
10/26/22	9006237	Respond to further inquiries from California Dept. of Insurance	Fates, Edward (Ted)	0.20	137.70	4,612.95	WO	HD	TR	_____
11/01/22	9016271	Advise Receiver on issues relating to closure / wind up of certain receivership entities	Fates, Edward (Ted)	0.20	137.70	4,750.65	WO	HD	TR	_____
11/07/22	9042108	Respond to various inquiries and requests from CA Department of Insurance	Fates, Edward (Ted)	0.60	413.10	5,163.75	WO	HD	TR	_____

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Fees for Matter 378827.00002.(SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
11/11/22	9025270	Call/emails with counsel for Champion-Cain re: criminal restitution issues, CTC settlement, and receivership distributions (.4) communications with SEC counsel re: same (.2)	Fates, Edward (Ted)	0.60	413.10	5,576.85	WO	HD	TR	_____
11/14/22	9042240	Respond to inquiries from CA Department of Insurance	Fates, Edward (Ted)	0.20	137.70	5,714.55	WO	HD	TR	_____
11/21/22	9035055	Communications with AUSA re: Champion-Cain criminal matter	Fates, Edward (Ted)	0.10	68.85	5,783.40	WO	HD	TR	_____
11/22/22	9035559	Call with AUSA concerning requests from CA Dept. of Insurance	Fates, Edward (Ted)	0.30	206.55	5,989.95	WO	HD	TR	_____
12/12/22	9055649	Advise Receiver on tax issues and dissolution of entities	Fates, Edward (Ted)	0.30	206.55	6,196.50	WO	HD	TR	_____

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt	Circle Action			
07/01/22	2774676	EDISC – CS Disco, Inc. - Monthly Hosting for July 2022	0.00	2,343.03	WO	HD	TR	_____
07/01/22	2775703	RSRCH – WestLaw	0.00	153.00	WO	HD	TR	_____
07/07/22	2781909	DCSRCH – Document Search - PACER - 04/22 - 06/22 Usage	0.00	48.30	WO	HD	TR	_____
07/07/22	2781910	DCSRCH – Document Search - PACER - 04/22 - 06/22 Usage	0.00	0.50	WO	HD	TR	_____
07/07/22	2781911	DCSRCH – Document Search - PACER - 04/22 - 06/22 Usage	0.00	0.40	WO	HD	TR	_____
07/08/22	2774288	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION,	0.00	175.80	WO	HD	TR	_____

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt					
		OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION							
07/08/22	2774289	POS – Nationwide Legal, LLC - Wells Fargo Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.95	WO	HD	TR		
07/08/22	2774290	POS – Nationwide Legal, LLC - SafeAmerica Credit Union, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	200.50	WO	HD	TR		
07/08/22	2774291	POS – Nationwide Legal, LLC - Wells Fargo Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.95	WO	HD	TR		
07/26/22	2774720	BW – Duplication - Black & White Copies	1,038.00	103.80	WO	HD	TR		
07/26/22	2774721	COLOR – Duplication - Color Copies	1.00	0.10	WO	HD	TR		
08/01/22	2781045	EDISC – CS Disco, Inc. - Monthly Hosting for August 2022	0.00	1,638.26	WO	HD	TR		
08/08/22	2778729	COURT – -San Diego Superior Court, Document download (Notice of Entry of Judgment; Declaration; Proposed Judgment deny)	0.00	11.00	WO	HD	TR		
08/09/22	2780143	RSRCH – WestLaw	0.00	215.00	WO	HD	TR		
08/11/22	2780144	RSRCH – WestLaw	0.00	199.00	WO	HD	TR		
08/31/22	2781191	ODS – Wells Fargo Summons and Subpoenas Department - Produced Documents	0.00	150.50	WO	HD	TR		
09/01/22	2780965	BW – Duplication - Black & White Copies	46.00	4.60	WO	HD	TR		
09/01/22	2782406	EDISC – CS Disco, Inc. - Monthly Hosting for September 2022	0.00	3,605.13	WO	HD	TR		
09/01/22	2782980	POS – Nationwide Legal, LLC - HAV Global Macro Fund, L.P., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION,	0.00	322.00	WO	HD	TR		

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
		OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION						
09/01/22	2784266	RSRCH – WestLaw	0.00	158.20	WO	HD	TR	_____
09/02/22	2781024	BW – Duplication - Black & White Copies	27.00	2.70	WO	HD	TR	_____
09/06/22	2786037	COURT – SD SUPERIOR CRT ROA-Fee for copy of minute order and notice of hearing	0.00	4.00	WO	HD	TR	_____
09/07/22	2781207	BW – Duplication - Black & White Copies	29.00	2.90	WO	HD	TR	_____
09/14/22	2781610	BW – Duplication - Black & White Copies	5.00	0.50	WO	HD	TR	_____
09/16/22	2782278	DEPO – Veritext, LLC - Deposition Transcript of Robert Volkel Taken on 09/13/2022	0.00	2,797.35	WO	HD	TR	_____
09/29/22	2787535	POS – Service of Process - Nationwide Legal LLC - Abbi Case. an Individual, Amended Summons In A Civil Action ; First Amended Complaint For Fraudulent Transfer	0.00	208.00	WO	HD	TR	_____
09/29/22	2787536	POS – Service of Process - Nationwide Legal LLC - Thomas Case, an Individual, Amended Summons In A Civil Action; First Amended Complaint For Fraudulent Transfer	0.00	81.80	WO	HD	TR	_____
09/29/22	2787537	POS – Service of Process - Nationwide Legal LLC - Charles C. D'Agostino, Jr., an individual, Amended Summons in a Civil Action; First Amended Complaint for Fraudulent Transfer	0.00	225.80	WO	HD	TR	_____
10/01/22	2789571	EDISC – CS Disco, Inc. - Monthly Hosting for October 2022	0.00	954.62	WO	HD	TR	_____
10/07/22	2795846	DCSRCH – Document Search - - PACER - Usage 3RD QTR	0.00	1.60	WO	HD	TR	_____
10/07/22	2795847	DCSRCH – Document Search - - PACER - Usage 3RD QTR	0.00	14.80	WO	HD	TR	_____
10/07/22	2795848	DCSRCH – Document Search - - PACER - Usage 3RD QTR	0.00	0.20	WO	HD	TR	_____

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
10/07/22	2795849	DCSRCH – Document Search - - PACER - Usage 3RD QTR	0.00	0.90	WO	HD	TR	_____
10/14/22	2785892	BW – Duplication - Black & White Copies	41.00	4.10	WO	HD	TR	_____
10/21/22	2788595	RSRCH – WestLaw	0.00	43.00	WO	HD	TR	_____
10/25/22	2786848	RECORD – Stewart Title Company - Recording Fees	0.00	94.00	WO	HD	TR	_____
10/27/22	2789270	MSNGR – Federal Express - Ship To: Stewart Title Company	0.00	32.59	WO	HD	TR	_____
10/31/22	2788869	BW – Duplication - Black & White Copies	38.00	3.80	WO	HD	TR	_____
11/01/22	2790504	EDISC – CS Disco, Inc. - Monthly Hosting for November 2022	0.00	1,236.22	WO	HD	TR	_____
11/14/22	2792545	RSRCH – WestLaw	0.00	100.00	WO	HD	TR	_____
11/16/22	2792546	RSRCH – WestLaw	0.00	190.20	WO	HD	TR	_____
11/23/22	2790644	BW – Duplication - Black & White Copies	305.00	30.50	WO	HD	TR	_____
11/28/22	2793508	MSNGR – Federal Express - Ship To: Theodore M Baum, Esq - McElroy Deutsch	0.00	29.07	WO	HD	TR	_____
11/28/22	2796582	DCSRCH – Research Fees - First Legal LLC - Allen Matkins - San Diego; CERTIFIED AMENDED CLERK'S DEFAULT JUDGMENT IN A CIVIL CA; Advance \$12.00	0.00	94.57	WO	HD	TR	_____
11/30/22	2794074	DEPO – Aptus Court Reporting - Deposition Transcript of Krista Freitag Taken on 11/17/2022	0.00	891.10	WO	HD	TR	_____
12/01/22	2795773	EDISC – CS Disco, Inc. - Monthly Hosting for December 2022	0.00	4,559.48	WO	HD	TR	_____
12/14/22	2794328	BW – Duplication - Black & White Copies	28.00	2.80	WO	HD	TR	_____
12/15/22	2794387	BW – Duplication - Black & White Copies	19.00	1.90	WO	HD	TR	_____
12/16/22	2796160	MSNGR – Federal Express - Ship To: Mr John Eric Churilla -	0.00	31.26	WO	HD	TR	_____

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Disbursements for Matter 378827.00002 (SEC v. Champion-Cain - General Receivers)

Trans Date	Index	Type	Quantity	Amt				
12/16/22	2796175	Ms Nicole Lorraine Churilla MSNGR – Federal Express - Ship To: Ms Nicole Lorraine Churilla	0.00	38.17	WO	HD	TR	_____
12/16/22	2796179	MSNGR – Federal Express - Ship To: Mr John Eric Churilla	0.00	38.17	WO	HD	TR	_____
12/16/22	2796180	MSNGR – Federal Express - Ship To: Illa Designs, LLC - Attn John Eric Churilla	0.00	38.17	WO	HD	TR	_____
12/19/22	2794830	BW – Duplication - Black & White Copies	423.00	42.30	WO	HD	TR	_____
12/20/22	2795040	BW – Duplication - Black & White Copies	74.00	7.40	WO	HD	TR	_____
12/27/22	2795949	BW – Duplication - Black & White Copies	398.00	39.80	WO	HD	TR	_____
12/28/22	2796001	BW – Duplication - Black & White Copies	98.00	9.80	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	9.00	688.50	6,196.50
		9.00		\$6,196.50
Subtotal Fees				\$6,196.50
Discount				0.00
Total Fees				6,196.50
Total Disbursements				21,582.59

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

02/28/23 17:16:57 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

Account Summary – As Of 02/28/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	21,291.75	21,291.75	0.00	15,095.25	15,095.25	0.00	431,302.44	95,250.60	336,051.84
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	338.19	0.45	337.74
Billed	104,383.27	2,534.85	101,848.42	72,452.32	1,800.45	70,651.87	65,571.75	65,571.75	314,469.25
Collected	104,383.27	2,534.85	101,848.42	72,452.32	1,800.45	70,651.87	380,041.00	65,571.75	314,469.25
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	74,438.47	29,678.40	44,760.07						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

02/28/23 17:16:58 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00003 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 02/13/23 Matter Name: SEC v. Champion-Cain - Asset Investigati
 Proforma Number: 1202924
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/01/22	8887394	Address issues relating to vendor charges/invoices for forensic data collection and related services	Fates, Edward (Ted)	0.60	413.10	413.10	WO	HD	TR
07/06/22	8886467	Advise on issues relating to IT vendor charges for forensic data collection work	Fates, Edward (Ted)	0.30	206.55	619.65	WO	HD	TR
09/07/22	8954666	Analyze and advise Receiver re: Cultivate trademark cancellation proceeding and related issues (.8) work on letter to US Patent and Trademark Office re: stay of trademark cancellation proceeding (.9) advise Receiver re: issues concerning vendor charges for forensic data collection and preservation (.4)	Fates, Edward (Ted)	2.20	1,514.70	2,134.35	WO	HD	TR
09/08/22	8955829	Revise and finalize letter to USPTO re: trademark cancellation proceeding (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	481.95	2,616.30	WO	HD	TR
09/09/22	8956757	Communications with counsel for plaintiff in trademark cancellation proceeding filed against Cultivate Juicing (.6) discuss same	Fates, Edward (Ted)	0.80	550.80	3,167.10	WO	HD	TR

02/28/23 17:16:58 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered with Receiver (.2)	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/13/22	8963129	Several emails/review the 2Budz briefing and call with Receiver counsel related to the claw back action and claim.	Zaro, David	0.40	358.20	3,525.30	WO	HD	TR _____
09/13/22	8977395	Communications with counsel for plaintiff in trademark cancellation proceeding, advise Receiver re: same	Fates, Edward (Ted)	0.30	206.55	3,731.85	WO	HD	TR _____
09/14/22	8961032	Advise Receiver re: dispute concerning vendor charges and resolution of same	Fates, Edward (Ted)	0.30	206.55	3,938.40	WO	HD	TR _____
10/27/22	9009759	Analyze ANI loan to and personal guaranty from Dash Wagon / Churilla and discuss steps to collect debt with G. Rodriguez	Fates, Edward (Ted)	1.10	757.35	4,695.75	WO	HD	TR _____
11/01/22	9042084	Communications with borrower relating to Dash Wagon loan and personal guaranty	Fates, Edward (Ted)	0.30	206.55	4,902.30	WO	HD	TR _____
11/04/22	9042102	Prepare for and attend call with personal guarantor on Dash Wagon loan (.4) analyze and discuss same with G. Rodriguez (.3)	Fates, Edward (Ted)	0.70	481.95	5,384.25	WO	HD	TR _____
11/16/22	9029626	Communications with G. Rodriguez re: Dash Wagon loan (.2) prepare correspondence to borrower re: Dash Wagon loan, personal guaranty, enforcement, and potential resolution (.5)	Fates, Edward (Ted)	0.70	481.95	5,866.20	WO	HD	TR _____
11/18/22	9033741	Analyze and advise G. Rodriguez on issues relating to Dash Wagon loan enforcement and next steps	Fates, Edward (Ted)	0.40	275.40	6,141.60	WO	HD	TR _____
11/28/22	9039009	Communications with G. Rodriguez re: Dash Wagon loan and enforcement issues	Fates, Edward (Ted)	0.40	275.40	6,417.00	WO	HD	TR _____

02/28/23 17:16:58 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
12/01/22	9047843	Call with G. Rodriguez and borrower on Dash Wagon loan regarding potential resolution of outstanding debt owed to ANI	Fates, Edward (Ted)	0.60	413.10	6,830.10	WO	HD	TR	_____
12/14/22	9060361	Several emails regarding draft complaint related to collection of note/guaranty, follow-up call with Receiver/counsel.	Zaro, David	0.40	358.20	7,188.30	WO	HD	TR	_____
12/15/22	9062330	Evaluate the loan documents, promissory note, security agreement, and guaranty, then revise draft complaint (1.4). Call with counsel related to strategy regarding note/guaranty litigation (.4). Follow-up on enforcement and foreclosure on the securities interest in assets, draft of form cause of action and advice to counsel (.5).	Zaro, David	2.30	2,059.65	9,247.95	WO	HD	TR	_____
12/15/22	9072546	Telephone conference, analysis, review of documents and exchange of e-mails re: potential personal property foreclosure pleading.	Farrell, Michael	0.70	576.45	9,824.40	WO	HD	TR	_____
12/16/22	9062350	Evaluate loan documents, Receiver email concerning damage calculation, review note and follow-up with Mr. Rodriguez (1.1). Attend call with counsel and advise as to cause of action, letters and follow-up (.5). Several emails and calls, review letter, revise default letters to borrower/the guarantors and follow-up with counsel (.7).	Zaro, David	2.30	2,059.65	11,884.05	WO	HD	TR	_____
12/19/22	9067679	Follow-up on the guaranty claims against Churilla and coordination of actions/federal rules (.4). Research/analysis of pre-judgment writ of attachment related to the	Zaro, David	1.60	1,432.80	13,316.85	WO	HD	TR	_____

02/28/23 17:16:58 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Fees for Matter 378827.00003.(SEC v. Champion-Cain - Asset Investigati)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Texas property, follow-up (1.2).						
12/30/22	9074957	Follow-up on the collection action related to Illa Designs and emails with Receiver counsel.	Zaro, David	0.30	268.65	13,585.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	7.30	895.50	6,537.15
000739	Farrell, Michael	0.70	823.50	576.45
001665	Fates, Edward (Ted)	9.40	688.50	6,471.90
		17.40		\$13,585.50
Subtotal Fees				\$13,585.50
Discount				0.00
Total Fees				13,585.50
Total Disbursements				0.00

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/28/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	44,867.70	44,867.70	0.00	31,282.20	31,282.20	0.00	470,004.10	460,875.60	9,128.50
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,075.11	9.63	3,065.48

02/28/23 17:16:58 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Billed	45,805.50	45,805.50	0.00	23,186.25	23,186.25	0.00	406,444.32	406,444.32	9,128.50
Collected	45,805.50	45,805.50	0.00	23,186.25	23,186.25	0.00	415,572.82	406,444.32	9,128.50
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total	Fees	Costs						
Balance	50,160.95	50,160.15	0.80						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

02/28/23 17:16:59 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00004 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 02/13/23 Matter Name: SEC v. Champion-Cain - Reporting
 Proforma Number: 1202924
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00004.(SEC v. Champion-Cain - Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/23/22	8935680	Work on Receiver's 12th interim report (1.1) discuss same with Receiver (.2) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	1.40	963.90	963.90	WO	HD	TR
08/23/22	8939030	Evaluate the draft of the Receiver's Report and conference with counsel as to narrative (.4). Conference and emails with counsel related to notice to the investors (.2).	Zaro, David	0.60	537.30	1,501.20	WO	HD	TR
09/02/22	8976554	Meet and confer with SEC counsel re: Receiver's 12th interim report (.2) updates to report (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.00	688.50	2,189.70	WO	HD	TR
12/06/22	9050852	Work on Receiver's 13th interim report (.9) meet and confer communications with SEC counsel re: same (.2)	Fates, Edward (Ted)	1.10	757.35	2,947.05	WO	HD	TR
12/13/22	9057035	Communications with Receiver and counsel for SEC re: 13th interim report	Fates, Edward (Ted)	0.40	275.40	3,222.45	WO	HD	TR
12/14/22	9057756	Revise and finalize Receiver's 13th interim report	Fates, Edward (Ted)	0.40	275.40	3,497.85	WO	HD	TR

02/28/23 17:16:59 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Fees for Matter 378827.00004.(SEC v. Champion-Cain - Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
------------	-------	---------------------------------	------------	-------	------	-----	---------------

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	895.50	537.30
001665	Fates, Edward (Ted)	4.30	688.50	2,960.55
		4.90		\$3,497.85
Subtotal Fees				\$3,497.85
Discount				0.00
Total Fees				3,497.85
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10
--

Account Summary – As Of 02/28/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,497.85	3,497.85	0.00	0.00	0.00	0.00	79,170.30	79,170.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	14,291.55	14,291.55	0.00	3,623.40	3,623.40	0.00	71,373.60	71,373.60	0.00
Collected	14,291.55	14,291.55	0.00	3,623.40	3,623.40	0.00	71,373.60	71,373.60	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	7,796.70	7,796.70	0.00						

02/28/23 17:16:59 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
 E3 Advisors
 401 West 'A' Street, Suite 1830
 San Diego, CA 92101

02/28/23 17:17:00 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00005 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 02/13/23 Matter Name: SEC v. Champion-Cain - Operations & Asse
 Proforma Number: 1202924
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00005.(SEC v. Champion-Cain - Operations & Asse)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/07/22	8887525	Analyze issues regarding transfer of liquor license for Patio Marketplace restaurant (.6) discuss same with Receiver (.4) revisions to purchase and sale agreement for liquor license transfer (.4)	Fates, Edward (Ted)	1.40	963.90	963.90	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.40	688.50	963.90
		1.40		\$963.90
Subtotal Fees				\$963.90
Discount				0.00
Total Fees				963.90
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold
 () BILL FEES ONLY () Write Off
 () BILL COST ONLY () Transfer All

02/28/23 17:17:00 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/28/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	963.90	963.90	0.00	0.00	0.00	0.00	742,734.45	742,734.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	31,728.15	31,728.15	0.00	9,494.55	9,494.55	0.00	741,770.55	741,770.55	0.00
Collected	31,728.15	31,728.15	0.00	9,494.55	9,494.55	0.00	741,770.55	741,770.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	963.90	963.90	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00006 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 02/13/23 Matter Name: SEC v. Champion-Cain - Claims & Distribu
 Proforma Number: 1202924
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/01/22	8887717	Follow-up as to the prospective settlement issues as to remaining investor claimants and strategy for negotiation (.4).	Zaro, David	0.40	358.20	358.20	WO	HD	TR
07/01/22	8887719	Conference with counsel concerning impact upon distribution of alternative settlement proposals as to Peterson, CalPrivate Bank and follow-up.	Zaro, David	0.20	179.10	537.30	WO	HD	TR
07/05/22	8885896	Communications with counsel for J. Cohen re: subpoena for information relating to investor claims and settlement payments, finalize and send subpoena (.8) communications with counsel for investors re: settlements with third parties and adjustments to claim amounts (.6)	Fates, Edward (Ted)	1.40	963.90	1,501.20	WO	HD	TR
07/06/22	8886807	Respond to inquiry from counsel for investors re: claims and distribution issues	Fates, Edward (Ted)	0.30	206.55	1,707.75	WO	HD	TR
07/07/22	8887508	Analyze documents produced pursuant to subpoena by counsel for J. Cohen regarding settlement payments made to	Fates, Edward (Ted)	0.70	481.95	2,189.70	WO	HD	TR

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		investors (.4) discuss same and adjustments to investor claim amounts re: same with Receiver (.3)							
07/08/22	8888869	Communications with counsel for investors re: third party settlements and adjustments to recommended allowed claim amounts	Fates, Edward (Ted)	0.20	137.70	2,327.40	WO	HD	TR
07/12/22	8892125	Call/emails with counsel for investor re: disputed claim and rising tide claim calculation	Fates, Edward (Ted)	0.90	619.65	2,947.05	WO	HD	TR
07/13/22	8893946	Advise Receiver re: notices to investors regarding adjustments to claims based on third party settlements (.4) work on draft letter to investors re: same (.5)	Fates, Edward (Ted)	0.90	619.65	3,566.70	WO	HD	TR
07/25/22	8904130	Analyze and advise Receiver re: response to late claim asserted by net winner	Fates, Edward (Ted)	0.40	275.40	3,842.10	WO	HD	TR
07/25/22	8908517	Evaluate the brief filed by CTC as to the Receiver's motion to approve allowed claims and follow-up.	Zaro, David	0.70	626.85	4,468.95	WO	HD	TR
07/27/22	8909501	Evaluate the Peterson opposition to claim objection and outline Receiver response.	Zaro, David	0.60	537.30	5,006.25	WO	HD	TR
07/28/22	8909521	Analysis of the CalPrivate Bank claims motion opposition and research cases/issues (2.2). Email and/call with counsel as to the UCC issues (.2).	Zaro, David	2.40	2,149.20	7,155.45	WO	HD	TR
07/29/22	8915656	Further research/analysis as to the 2Budz claim opposition, reply and CalPrivate reply.	Zaro, David	0.80	716.40	7,871.85	WO	HD	TR

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/01/22	8916397	Analyze investor oppositions to claims approval motion relating to disputed claims and MIMO approach, responses to same (1.4) analyze Nossaman motion for relief from litigation stay to assert claims against ANI in state court (.7)	Fates, Edward (Ted)	2.10	1,445.85	9,317.70	WO	HD	TR	_____
08/01/22	8917422	Research/analysis of the opposition briefs related to claims treatment and the related issues (1.3). Prepare for/attend meeting to work on the oppositions, Receiver reply to briefs and follow-up as to outline (1.1).	Zaro, David	2.40	2,149.20	11,466.90	WO	HD	TR	_____
08/01/22	8940726	Review documents in connection with CalPrivate Opposition to Receiver claims recommendations and legal analysis of issues presented in same (1.6); teleconference with D. Zaro regarding same (0.2).	Del Castillo, Joshua	1.80	1,239.30	12,706.20	WO	HD	TR	_____
08/01/22	8949248	Review and analyze CalPrivate's evidentiary objections to Freitag declarations	Pham, Matt D.	1.00	481.50	13,187.70	WO	HD	TR	_____
08/02/22	8916848	Analyze issues re: Nossaman motion for relief from litigation stay, arguments in opposition, work on opposition to same (.9) work on reply brief regarding oppositions to claims approval motion filed by K. Peterson, 2Budz, and CTC (3.8) analyze and advise on draft responses to evidentiary objections re: claims motion (.9)	Fates, Edward (Ted)	5.60	3,855.60	17,043.30	WO	HD	TR	_____
08/02/22	8918294	Research/analysis of the claims of CalPrivate Bank, work on outline of reply brief, then draft portions of the brief (3.8).	Zaro, David	4.40	3,940.20	20,983.50	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Meeting with Receiver counsel related to reply to oppositions to the claims motion (.6).							
08/02/22	8918303	Evaluate the Nossaman motion for relief from the stay as to the actions against receivership and call with counsel as to Receiver's response.	Zaro, David	0.40	358.20	21,341.70	WO	HD	TR
08/02/22	8949251	Begin drafting Receiver's responses to CalPrivate's evidentiary objections	Pham, Matt D.	1.60	770.40	22,112.10	WO	HD	TR
08/02/22	8949253	Review and analyze CalPrivate's evidentiary objections; continue drafting Receiver's responses thereto	Pham, Matt D.	2.30	1,107.45	23,219.55	WO	HD	TR
08/02/22	8949256	Continue drafting Receiver's responses to CalPrivate's evidentiary objections	Pham, Matt D.	2.10	1,011.15	24,230.70	WO	HD	TR
08/03/22	8918196	Analysis of security interest question and teleconference with D. Zaro regarding same (1.0); review treatise in connection with inquiry from D. Zaro (0.1).	Del Castillo, Joshua	1.10	757.35	24,988.05	WO	HD	TR
08/03/22	8918385	Work on reply to oppositions to claims allowance and plan approval motion (2.7) work on opposition to Nossaman motion for relief from stay to pursue indemnity claims (3.2)	Fates, Edward (Ted)	5.90	4,062.15	29,050.20	WO	HD	TR
08/03/22	8920186	Research/analysis of the CalPrivate Bank opposition brief, prepare reply brief (1.8). Work on evidentiary objections to declarations filed in opposition to the claims treatment (2.3).	Zaro, David	4.10	3,671.55	32,721.75	WO	HD	TR

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/03/22	8949266	Confer with Ted Fates regarding responses to CalPrivate's evidentiary objections	Pham, Matt D.	0.20	96.30	32,818.05	WO	HD	TR	_____
08/03/22	8949267	Revise Receiver's responses to CalPrivate's evidentiary objections in light of comments from Ted Fates	Pham, Matt D.	0.30	144.45	32,962.50	WO	HD	TR	_____
08/03/22	8949268	Continue revising Receiver's responses to CalPrivate's evidentiary objections	Pham, Matt D.	0.50	240.75	33,203.25	WO	HD	TR	_____
08/04/22	8920008	Work on reply to oppositions of K. Peterson and Fenley investors to claims allowance and plan motion (2.1) analyze and revise arguments in draft reply to CalPrivate opposition to claims allowance and plan motion (1.8) call with counsel for Ovation re: Nossaman motion for relief to assert indemnity claims against ANI (.3) work on opposition to Nossaman motion (1.9)	Fates, Edward (Ted)	6.10	4,199.85	37,403.10	WO	HD	TR	_____
08/05/22	8920060	Work on opposition to Nossaman motion for relief from stay to assert indemnity claims in state court (.6) work on omnibus reply to oppositions to claims allowance and plan motion (1.7)	Fates, Edward (Ted)	2.30	1,583.55	38,986.65	WO	HD	TR	_____
08/05/22	8922918	Review/revise draft of narrative for the reply brief concerning the claim objections and call/email with counsel concerning evidence issues.	Zaro, David	0.90	805.95	39,792.60	WO	HD	TR	_____
08/08/22	8921706	Discuss reply in support of claims allowance and plan motion with Receiver	Fates, Edward (Ted)	0.30	206.55	39,999.15	WO	HD	TR	_____
08/08/22	8925899	Evaluate the draft of reply to Nossaman brief related to stay, follow-up call with	Zaro, David	1.30	1,164.15	41,163.30	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		counsel.							
08/09/22	8922674	Revisions to draft opposition to Nossaman motion for relief to assert indemnity claim (.7) discuss same with Receiver (.2) work on revisions to omnibus reply to oppositions to claims allowance and plan motion (.5)	Fates, Edward (Ted)	1.40	963.90	42,127.20	WO	HD	TR _____
08/09/22	8925924	Further research as to stay claims, revise draft of the Receiver opposition and follow-up (.8). Revise the draft of Receiver's reply brief and associated declaration, follow-up regarding same (1.8). Email concerning the declaration/reply brief (.2).	Zaro, David	2.80	2,507.40	44,634.60	WO	HD	TR _____
08/09/22	8949335	Perform legal research regarding striking procedurally improper filing	Pham, Matt D.	0.80	385.20	45,019.80	WO	HD	TR _____
08/09/22	8949336	Perform legal research regarding district court's discretion to disregard similar bankruptcy law	Pham, Matt D.	1.10	529.65	45,549.45	WO	HD	TR _____
08/09/22	8949338	Revise and update Receiver's motion to strike and evidentiary objections to CalPrivate's supporting Yoder declaration	Pham, Matt D.	0.70	337.05	45,886.50	WO	HD	TR _____
08/10/22	8923764	Work on omnibus reply brief in support of claims allowance and plan motion (2.8) revisions to opposition to Nossaman motion for relief from litigation stay (.8) discuss same with Receiver (.3) work on supplemental declaration of Receiver in support of claims allowance and plan motion (.8)	Fates, Edward (Ted)	4.70	3,235.95	49,122.45	WO	HD	TR _____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/10/22	8929333	Research/analysis of the constitutional issues/claimants, then revise draft of the reply brief as to all disputed claims (1.8). Emails/call with counsel as to the reply brief arguments (.3).	Zaro, David	2.10	1,880.55	51,003.00	WO	HD	TR	_____
08/10/22	8949357	Continue drafting and revising evidentiary objections to Yoder declaration	Pham, Matt D.	2.40	1,155.60	52,158.60	WO	HD	TR	_____
08/11/22	8925087	Analyze and discuss revisions and issues relating to omnibus reply brief in support of claims motion with Receiver	Fates, Edward (Ted)	1.20	826.20	52,984.80	WO	HD	TR	_____
08/11/22	8949374	Perform legal research regarding MIMO/net loss claim calculation issue	Pham, Matt D.	1.60	770.40	53,755.20	WO	HD	TR	_____
08/12/22	8925730	Discuss facts, comments and approach to CalPrivate and Peterson arguments in omnibus reply brief with Receiver	Fates, Edward (Ted)	1.10	757.35	54,512.55	WO	HD	TR	_____
08/14/22	8929489	Evaluate Receiver revisions, issues raised as to reply brief and analysis as to the changes (.8). Meeting with counsel to address the Receiver revisions, declarations (.7). Follow-up email to counsel related to reply (.2).	Zaro, David	1.70	1,522.35	56,034.90	WO	HD	TR	_____
08/15/22	8927307	Work on revisions to CalPrivate and Peterson arguments for omnibus reply brief (3.2) work on supplement declaration from Receiver in support of claims motion (1.9)	Fates, Edward (Ted)	5.10	3,511.35	59,546.25	WO	HD	TR	_____
08/15/22	8929449	Analysis and make further revisions to the claims objection reply brief and emails with counsel/CTC as to the revisions/arguments (1.8). Call/email to address objections to	Zaro, David	2.60	2,328.30	61,874.55	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered the declarations and revisions to the drafts (.8).	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/18/22	8931745	Communications with counsel for investor claimant Nautilus re: claims process and distributions	Fates, Edward (Ted)	0.50	344.25	62,218.80	WO	HD	TR
08/19/22	8937976	Call as to the status of the restitution motion hearings as to Champion-Cain, accounting and coordinate with settlement/claims hearing.	Zaro, David	0.30	268.65	62,487.45	WO	HD	TR
08/22/22	8934886	Advise Receiver regarding investor dispute over claim adjustment relating to settlement payment, communications with counsel for investor re: same (.6) analyze Nossaman reply brief regarding motion for relief from stay to pursue claims against ANI in state court (.5)	Fates, Edward (Ted)	1.10	757.35	63,244.80	WO	HD	TR
08/22/22	8939137	Evaluate the UCC-w issues and analysis related to oral argument.	Zaro, David	0.40	358.20	63,603.00	WO	HD	TR
08/23/22	8935953	Confer with Receiver and counsel re: strategy and arguments for 8/30 hearing (.8) discuss change in hearing date and notice to investors re: same with Receiver (.3)	Fates, Edward (Ted)	1.10	757.35	64,360.35	WO	HD	TR
08/23/22	8939039	Meeting with Receiver and counsel to prepare for the oral argument related to the pending claim and settlement motions and follow-up with Receiver counsel.	Zaro, David	0.80	716.40	65,076.75	WO	HD	TR
08/24/22	8937333	Analyze issues and prepare arguments for 8/30 hearing on claims approval and plan	Fates, Edward (Ted)	3.10	2,134.35	67,211.10	WO	HD	TR

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		motion (1.6) call from investor regarding claim issue (.3) call from counsel for investors regarding dispute concerning adjustments to MIMO claims on account of settlement payments (.5) discuss same with Receiver (.2) advise Receiver re: second continuance of hearing and notice to investors re: same (.3) communications with counsel for CTC re: same and joint motion re: listen-only telephone line (.2)							
08/25/22	8939351	Analyze arguments and case cites by CalPrivate and Wakefield investors in opposition to claims allowance and plan motion	Fates, Edward (Ted)	1.30	895.05	68,106.15	WO	HD	TR
08/29/22	8941918	Advise on pleadings and related documents needed for 8/31 hearing (.3) call with counsel for ABC investors relating to settlements, adjustments to claims and related issues (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	619.65	68,725.80	WO	HD	TR
08/30/22	8953926	Evaluate the Court Minute Orders and Receiver memo as to upcoming oral argument, follow-up as to both settlement and claims motions.	Zaro, David	0.30	268.65	68,994.45	WO	HD	TR
08/31/22	8945351	Analyze and prepare arguments for 8/31 hearing on claims approval and plan (1.3) attend hearing (1.4)	Fates, Edward (Ted)	2.70	1,858.95	70,853.40	WO	HD	TR
09/01/22	8953932	Evaluate several emails concerning the hearing as to the claims motion and settlement motion, follow-up with counsel (.4). Review of CTC ex parte application	Zaro, David	0.80	716.40	71,569.80	WO	HD	TR

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		following the hearing, counsel's responses and the Ovation Nossaman filings (.4).							
09/06/22	8953999	Analyze Peterson motion for further oral argument on claims motion (.4) advise Receiver re: same (.3)	Fates, Edward (Ted)	0.70	481.95	72,051.75	WO	HD	TR
09/06/22	8955982	Follow-up on the hearing as to the claims motion, court's response and the CalPrivate claim issues (.4). Evaluate emails and brief seeking oral argument from Peterson (.4). Follow-up on the motion to approve the Receiver's plan with counsel for Receiver and response to request for hearing (.3).	Zaro, David	1.10	985.05	73,036.80	WO	HD	TR
09/07/22	8954739	Work on opposition to K. Peterson motion for further oral argument on claims motion (1.7) discuss same with Receiver (.4)	Fates, Edward (Ted)	2.10	1,445.85	74,482.65	WO	HD	TR
09/07/22	8957059	Follow-up on and advice/email to Receiver and counsel related to the Peterson claim, oral argument, follow-up with counsel (.6). Revise draft opposition to Peterson motion and email to counsel (.6).	Zaro, David	1.20	1,074.60	75,557.25	WO	HD	TR
09/13/22	8963136	Call with counsel related to the Peterson motion concerning claims arguments.	Zaro, David	0.20	179.10	75,736.35	WO	HD	TR
09/14/22	8961113	Analyze K. Peterson reply regarding motion for further oral argument	Fates, Edward (Ted)	0.40	275.40	76,011.75	WO	HD	TR
09/14/22	8963240	Several emails related to and evaluation of the Peterson motion for oral argument and reply brief/related joinders.	Zaro, David	0.60	537.30	76,549.05	WO	HD	TR

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/15/22	8966451	Emails and evaluate the reply briefs, joinders by Peterson and investor claimants.	Zaro, David	0.60	537.30	77,086.35	WO	HD	TR	_____
09/21/22	8967922	Respond to inquiry from investor re: claims motion and anticipated timing of distributions	Fates, Edward (Ted)	0.20	137.70	77,224.05	WO	HD	TR	_____
09/27/22	8975264	Respond to inquiry from investor re: claims and distributions	Fates, Edward (Ted)	0.20	137.70	77,361.75	WO	HD	TR	_____
10/05/22	8986149	Analyze order denying Kim Funding request for further oral argument and allowing further briefing re: distribution plan, advise Receiver re: same	Fates, Edward (Ted)	0.50	344.25	77,706.00	WO	HD	TR	_____
10/05/22	8988491	Evaluate the court's order related to the Peterson objection, oral argument, call with Receiver counsel regarding Receiver response (.6). Evaluate previous filings by Peterson related to claim/research the subordination issue (1.2).	Zaro, David	1.80	1,611.90	79,317.90	WO	HD	TR	_____
10/06/22	8988644	further research/analysis related to the Peterson objections to the Receiver's plan and treatment of Peterson and Peterson entity claims/disallowance and follow-up.	Zaro, David	1.60	1,432.80	80,750.70	WO	HD	TR	_____
10/11/22	8991803	Initial review and analysis of arguments in Kim Funding supplemental briefing	Fates, Edward (Ted)	0.40	275.40	81,026.10	WO	HD	TR	_____
10/12/22	8993147	Analyze arguments and cases cited in Kim Funding supplemental brief (1.9) discuss same with Receiver (.3) work on brief in support of denial of Kim Funding claims (4.4)	Fates, Edward (Ted)	6.60	4,544.10	85,570.20	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/12/22	8993655	Evaluate/analysis of the Peterson opposition and the declaration of Ms. Brown (.9). Callk with Receiver counsel related to the Peterson brief and Receiver strategy, follow-up (.5).	Zaro, David	1.40	1,253.70	86,823.90	WO	HD	TR	_____
10/13/22	8993520	Revisions to brief in response to Kim Peterson supplemental brief (1.1) analyze supporting evidence relating to issues in brief (.6) work on Receiver declaration in support of response and exhibits thereto (1.6) discuss same with Receiver (.9) call from counsel for CalPrivate Bank re: potential settlement of disputed claim and Peterson-related issues (.5) discuss same with Receiver (.4)	Fates, Edward (Ted)	5.10	3,511.35	90,335.25	WO	HD	TR	_____
10/13/22	8996142	Review/analysis of case law in support of Peterson and evaluate Receiver's response, revise the draft of the Receiver's reply to the Peterson opposition brief (1.2). Follow-up call/email as to evidence/declaration and support of Receiver's objection to claim (.9).	Zaro, David	2.10	1,880.55	92,215.80	WO	HD	TR	_____
10/13/22	9012814	Locate documents regarding Ovation and Kim Funding per Ted Fates' request	Pham, Matt D.	0.40	192.60	92,408.40	WO	HD	TR	_____
10/14/22	8994136	Analyze legal issues relating to prospective appeal by CalPrivate of order on claims/distributions and request for stay pending appeal, potential settlement of same and related CalPrivate issues (1.3) work on revisions to response to Kim Funding supplemental brief and Receiver	Fates, Edward (Ted)	3.40	2,340.90	94,749.30	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered declaration in support (1.2) discuss same with Receiver (.9)	Timekeeper	Hours	Fees	Sum	Circle Action			
10/14/22	8996266	Evaluate Receiver's revisions to the draft reply to Peterson brief regarding claims allowance (.7). Prepare for/call related to the CalPrivate offer/settlement negotiations and strategy (.3). Research/analysis regarding appeal/the stay pending appeal (.5). Analysis related to settlement as to disputed claims and impact of appeals and conference with counsel (.6).	Zaro, David	2.10	1,880.55	96,629.85	WO	HD	TR	_____
10/18/22	8997294	Discuss settlement issues relating to CalPrivate claims with Receiver (.3) respond to inquiry from investor re: timing of distributions (.2)	Fates, Edward (Ted)	0.50	344.25	96,974.10	WO	HD	TR	_____
10/20/22	9000222	Analyze issues and strategy re: disputed CalPrivate claim and potential settlement (.4) communications with counsel for CalPrivate re: same (.2)	Fates, Edward (Ted)	0.60	413.10	97,387.20	WO	HD	TR	_____
10/20/22	9003433	Follow-up on the objections and possible appeals, call related to the CalPrivate settlement communication and the Receiver's response, the appeals/related issues.	Zaro, David	0.40	358.20	97,745.40	WO	HD	TR	_____
10/21/22	9001340	Call with counsel for CalPrivate regarding potential settlement issues (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.80	550.80	98,296.20	WO	HD	TR	_____
10/21/22	9003574	Analysis of emails related to the CalPrivate settlement offer, assess receiver's response and next steps.	Zaro, David	0.40	358.20	98,654.40	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/27/22	9010427	Evaluate the issues related to distributions, call with Receiver elated to distributions and follow-up (.3). Review of plan terms to assess possible strategies (.5).	Zaro, David	0.80	716.40	99,370.80	WO	HD	TR	_____
10/31/22	9009568	Analyze CalPrivate settlement communications re: disputed claim and related legal issues	Fates, Edward (Ted)	1.20	826.20	100,197.00	WO	HD	TR	_____
10/31/22	9014871	Several emails/analysis of the CalPrivate prospective motion for stay pending appeal and research (1.4). Call with Receiver's counsel related to the stay motion and follow-up (.5)	Zaro, David	1.90	1,701.45	101,898.45	WO	HD	TR	_____
11/02/22	9017185	Call with counsel for CalPrivate re: potential settlement of disputed claim, assignment of claims against Peterson Trust, potential appeals, and related issues (.7) advise Receiver re: same (.5)	Fates, Edward (Ted)	1.20	826.20	102,724.65	WO	HD	TR	_____
11/02/22	9020692	Email/call with Receiver's counsel to evaluate CalPrivate's draft stay motion and other third party investors prospective withdrawal of objections.	Zaro, David	0.60	537.30	103,261.95	WO	HD	TR	_____
11/03/22	9017974	Analyze issues and prepare settlement communication to counsel for CalPrivate (.8) follow up call/emails re: same (.5) advise Receiver re: same (.4)	Fates, Edward (Ted)	1.70	1,170.45	104,432.40	WO	HD	TR	_____
11/03/22	9020724	Several emails related to the CalPrivate claims and negotiations.	Zaro, David	0.20	179.10	104,611.50	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/04/22	9020793	Analysis of CalPrivate counter offer and proposal as to claim and CTC settlement, follow-up (5.) Several calls/emails with counsel as to the CalPrivate settlement of claims issues (.6).	Zaro, David	1.10	985.05	105,596.55	WO	HD	TR	_____
11/04/22	9042103	Call with CTC counsel re: settlement negotiations regarding CalPrivate claim dispute and objection to Receiver/CTC global settlement	Fates, Edward (Ted)	0.30	206.55	105,803.10	WO	HD	TR	_____
11/07/22	9042110	Discuss CalPrivate settlement issues with Receiver (.3) communications with counsel for CTC re: same (.3)	Fates, Edward (Ted)	0.60	413.10	106,216.20	WO	HD	TR	_____
11/09/22	9022948	Analyze settlement issues regarding CalPrivate disputed claim and prospective appeal, guaranty claim against K. Peterson, and advise Receiver re: same and next steps (.9) communications re: settlement with counsel for CalPrivate (.5)	Fates, Edward (Ted)	1.40	963.90	107,180.10	WO	HD	TR	_____
11/09/22	9025488	Evaluate email communication and analysis of negotiations with CalPrivate and third party objectors/Receiver's position and develop strategy (.3). Call with counsel related to the settlement negotiations, follow-up (.3).	Zaro, David	0.60	537.30	107,717.40	WO	HD	TR	_____
11/10/22	9024331	Respond to inquiry from investor regarding timing of prospective distributions	Fates, Edward (Ted)	0.20	137.70	107,855.10	WO	HD	TR	_____
11/16/22	9029609	Address inquiry from investor relating to claim and distributions	Fates, Edward (Ted)	0.20	137.70	107,992.80	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/29/22	9040593	Assist Receiver in responding to investor inquiries concerning claims and timing of distributions (.4) respond to direct inquiry from investor regarding timing of distributions (.3)	Fates, Edward (Ted)	0.70	481.95	108,474.75	WO	HD	TR	_____
11/30/22	9042192	Respond to inquiry from creditor claimant regarding claim approval and timing of anticipated distributions	Fates, Edward (Ted)	0.40	275.40	108,750.15	WO	HD	TR	_____
12/01/22	9045078	Advise Receiver re: update to receivership website for information for investors	Fates, Edward (Ted)	0.20	137.70	108,887.85	WO	HD	TR	_____
12/07/22	9052285	Call with counsel for CalPrivate Bank re: potential settlement of disputed claim, appeal related to same, and claims against Kim Peterson	Fates, Edward (Ted)	1.10	757.35	109,645.20	WO	HD	TR	_____
12/09/22	9053987	Call with counsel for CalPrivate re: disputed claim, potential appeal and motion for stay pending appeal, claims against K. Peterson, settlement issues and potential mediation (1.1) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.50	1,032.75	110,677.95	WO	HD	TR	_____
12/14/22	9058401	Communications with counsel for CalPrivate Bank re: potential settlement issues (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.40	275.40	110,953.35	WO	HD	TR	_____
12/15/22	9059067	Call/emails with counsel for CalPrivate Bank re: settlement issues and conference with Judge Goddard re: same (.4) advise Receiver re: same (.2) communications with Judge Goddard chambers re: same (.2)	Fates, Edward (Ted)	0.80	550.80	111,504.15	WO	HD	TR	_____
12/15/22	9062327	Call with counsel related to the CalPrivate claims, pending motion and settlement	Zaro, David	0.70	626.85	112,131.00	WO	HD	TR	_____

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

Fees for Matter 378827.00006.(SEC v. Champion-Cain - Claims & Distribu)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		meeting/mediation (.4). Follow-up on the CalPrivate claim mediation, further discussion with counsel as to mediation parameters (.3).						
12/16/22	9062352	Follow-up on CalPrivate related to the prospective settlement and courts orders.	Zaro, David	0.30	268.65	112,399.65	WO	HD TR
12/26/22	9070086	Follow-up to review appeals by Ovation and Peterson, assess Receiver's next steps.	Zaro, David	0.40	358.20	112,757.85	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	50.50	895.50	45,222.75
001665	Fates, Edward (Ted)	84.70	688.50	58,315.95
001842	Del Castillo, Joshua	2.90	688.50	1,996.65
002510	Pham, Matt D.	15.00	481.50	7,222.50
		153.10		\$112,757.85
Subtotal Fees				\$112,757.85
Discount				0.00
Total Fees				112,757.85
Total Disbursements				0.00

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/28/23

02/28/23 17:17:01 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	163,318.50	163,318.50	0.00	50,560.65	50,560.65	0.00	732,828.15	732,828.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	71,034.30	71,034.30	0.00	40,358.70	40,358.70	0.00	439,676.55	439,676.55	0.00
Collected	71,034.30	71,034.30	0.00	40,358.70	40,358.70	0.00	439,676.55	439,676.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	293,151.60	293,151.60	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101

02/28/23 17:17:05 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00008 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 02/13/23 Matter Name: SEC v. Champion-Cain - Pending Litigatio
 Proforma Number: 1202924
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00008.(SEC v. Champion-Cain - Pending Litigatio)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/29/22	8976856	Communications with counsel for plaintiff in Luu action pending in state court re: status conference, claim asserted in receivership	Fates, Edward (Ted)	0.40	275.40	275.40	WO	HD	TR
09/30/22	8978189	Further communications with counsel for P. Luu, revisions to stipulation to continue status conference in state court action	Fates, Edward (Ted)	0.50	344.25	619.65	WO	HD	TR
12/12/22	9055196	Communications with counsel for Luu re: pending state court case	Fates, Edward (Ted)	0.40	275.40	895.05	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.30	688.50	895.05
		1.30		\$895.05
Subtotal Fees				\$895.05
Discount				0.00
Total Fees				895.05
Total Disbursements				0.00

02/28/23 17:17:05 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/28/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,308.15	1,308.15	0.00	413.10	413.10	0.00	59,833.80	59,833.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	24,795.00	24,795.00	0.00	21,184.20	21,184.20	0.00	57,946.50	57,946.50	0.00
Collected	24,795.00	24,795.00	0.00	21,184.20	21,184.20	0.00	57,946.50	57,946.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,887.30	1,887.30	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Krista Freitag, as Receiver for ANI Development, LLC, et al.
 E3 Advisors
 401 West 'A' Street, Suite 1830
 San Diego, CA 92101

02/28/23 17:17:06 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)	Matter #: 378827.00009	Client Name: Krista Freitag, as Receiver for ANI Deve
Date of Last Billing: 02/13/23		Matter Name: SEC v. Champion-Cain - Employment/Fees
Proforma Number: 1202924		
Client/Matter Joint Group # 378827-1		Client Matter Number:

Fees for Matter 378827.00009.(SEC v. Champion-Cain - Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/13/22	8959573	Advise Receiver re: issues relating to 8th interim fee application	Fates, Edward (Ted)	0.20	137.70	137.70	WO	HD	TR
09/14/22	8964509	Revisions to Receiver's 8th interim fee application (1.4) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.80	1,239.30	1,377.00	WO	HD	TR
09/15/22	8961778	Meet and confer communications with SEC counsel regarding 8th interim fee applications and exhibits	Fates, Edward (Ted)	0.20	137.70	1,514.70	WO	HD	TR
09/19/22	8965268	Revisions to Receiver's 8th interim fee application	Fates, Edward (Ted)	0.30	206.55	1,721.25	WO	HD	TR
09/20/22	8966430	Meet and confer with SEC counsel re: fee applications (.1) call with court clerk regarding hearing date for fee applications (.1) communications with Receiver re: final revisions to fee application, notice and proposed order (.2)	Fates, Edward (Ted)	0.40	275.40	1,996.65	WO	HD	TR

Proforma Summary

02/28/23 17:17:06 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.90	688.50	1,996.65
		2.90		\$1,996.65
Subtotal Fees				\$1,996.65
Discount				0.00
Total Fees				1,996.65
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 02/28/23

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,029.40	3,029.40	0.00	1,032.75	1,032.75	0.00	13,089.15	13,089.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	2,839.05	2,839.05	0.00	1,737.45	1,737.45	0.00	8,386.65	8,386.65	0.00
Collected	2,839.05	2,839.05	0.00	1,737.45	1,737.45	0.00	8,386.65	8,386.65	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	4,702.50	4,702.50	Costs						
Balance			0.00						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

02/28/23 17:17:06 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Krista Freitag, as Receiver for ANI Development, LLC, et al.
E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101
