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

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,
V.

GINA CHAMPION-CAIN AND ANI DEVELOPMENT, LLC

Defendants, and
AMERICAN NATIONAL INVESTMENTS, INC.

Relief Defendants.

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

## NOTICE OF INTERIM DISTRIBUTION

Ctrm: 14A
Judge Hon. Larry A. Burns

Krista Freitag ("Receiver"), the Court-appointed permanent receiver for Defendant ANI Development, LLC, Relief Defendant American National Investments, Inc., and their subsidiaries and affiliates ("Receivership Entities"), hereby gives notice that she intends to make an interim distribution of receivership estate funds pursuant to the Court-approved Distribution Plan.

The receivership estate currently holds approximately $\$ 40$ million in cash. The Receiver has carefully considered the receivership estate's potential settlement payment obligations, along with the work remaining to be done in administering the receivership estate, pending litigation matters (including the unknowns associated with several pending Ninth Circuit appeals), outstanding and projected administrative and operating expenses of the receivership, and other factors, and has determined, in her business judgment and pursuant to the Distribution Plan, that \$21 million of General Receivership Funds (as defined in the Distribution Plan's Rising Tide Distribution Method) can safely be distributed to investors and trade and tax creditors with Allowed Claims at this time. A schedule showing the interim distribution amount to each holder ${ }^{1}$ of an Allowed Claim (identified using the same unique identifiers assigned to claims during the receivership claims administration process) is attached hereto as Exhibit A. A schedule showing the interim distribution amount for each trade and tax creditor holder of an Allowed Claim is attached hereto as Exhibit B.

The remaining approximately $\$ 19$ million in receivership funds (along with future recoveries by the Receiver) will be held in reserve for the time being. Included in the reserve is the $\$ 9,520,080.13$ allocated to pay CalPrivate Bank's claim in the receivership in full, the $\$ 500,000$ prospective settlement payment to

[^0]CalPrivate Bank, ${ }^{2}$ and CTC Settlement Funds ${ }^{3}$ of $\$ 2,051,421.40$ (i.e. the Chicago Title Global Settlement funds that were not allocated for distribution to any specific investor) that must be distributed last under the approved Rising Tide distribution method due to the fact that tax and trade creditors and Chicago Title will not share in the distribution of those funds, as provided in the Global Settlement and Distribution Plan. Thus, subject to the above, this $\$ 2,051,421.40$ will be calculated last and distributed to investor claimants with Allowed Claims after all General Receivership Funds distributions have been calculated. The remainder of the cash reserve represents a significant contingency reserve given the various unknowns and potential unforeseen expenses remaining in this case and will cover outstanding and projected administrative and operating expenses to complete the Receiver's remaining work (including pending litigation matters).

As is presented on Exhibit A, this interim distribution of $\$ 21$ million will take investor, trade and tax creditor claimants with Allowed Claims' first interim Distribution Recovery Rate to approximately $90.92 \%$ and will provide distribution payments to approximately $90 \%$ of investors with Allowed Claims. Twenty-nine (29) investor claimants with Allowed Claims have prior recovery rates of greater than $90.92 \%$ and thus, will not be receive a payment as part of this first interim distribution. The net effect of the proposed $\$ 21$ million interim distribution, plus the proposed payments to CalPrivate Bank, will be to reduce the remaining Allowed Claims against the receivership estate to an amount less than $\$ 16$ million.

Once the Receiver's work is close to completion, the Receiver will seek final approval of all outstanding fees and costs of the receivership, as well as authority to make a final distribution of General Receivership Funds and CTC Settlement Funds. In the event it becomes appropriate to distribute additional receivership funds on an

2 The Joint Motion of the Receiver and CalPrivate Bank for approval of the proposed settlement with CalPrivate Bank is pending. Dkt. 956.
As defined in the Distribution Plan's Rising Tide Distribution Method.
interim basis prior to the substantial completion of the Receiver's work, the Receiver will provide another notice (similar to this notice) of a further interim distribution.

Any investor or trade and tax creditor who objects to the interim distribution proposed herein must contact the Receiver ${ }^{4}$ and make their objection known within 15 days of this notice. In the event the objection has not been resolved within the 15-day period, the investor or creditor must then file their objection with the Court within 10 days of the 15 -day period. The Court can then decide the objection or, if appropriate, determine the appropriate procedures for doing so. If there are no objections, the Receiver will proceed with issuing the interim distribution payments, pursuant to the attached Exhibits A and B and as provided in the approved Distribution Plan. Dkt. 807-4.

Dated: April 11, 2023
ALLEN MATKINS LECK GAMBLE MALLORY \& NATSIS LLP

By: s/Edward G. Fates
DAVID R. ZARO
EDWARD G. FATES
MATTHEW D. PHAM Attorneys for Receiver KRISTA FREITAG

4 Contact must be made via email at ani@ethreeadvisors.com or via mail sent to E3 Advisors, Attn: ANI Claims Administration, 501 West Broadway, Suite 290, San Diego, CA 92101.

## EXHIBIT INDEX

| EXHIBIT NO. | DESCRIPTION | PAGE NO. |
| :--- | :--- | :---: |
| Exhibit A | Schedule of interim distribution amount to each holder | 6 |
| Exhibit B | Schedule of interim distribution amount for each trade and tax <br> creditor holder | 19 |

## EXHIBIT A

| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 1 | 65,224.28 | 79.93\% | 35,720.20 | 90.92\% |
| 2 | 37,500.00 | 70.00\% | 26,152.28 | 90.92\% |
| 3 | 48,831.30 | 74.30\% | 31,582.76 | 90.92\% |
| 4 | 20,250.00 | 70.00\% | 14,122.23 | 90.92\% |
| 9 | 140,000.00 | 65.00\% | 103,687.28 | 90.92\% |
| 10 | 48,507.00 | 92.09\% | 0.00 | 92.09\% |
| 11 | 19,121.52 | 80.34\% | 10,292.99 | 90.92\% |
| 12 | 31,060.12 | 66.24\% | 22,708.19 | 90.92\% |
| 13 | 38,956.69 | 71.14\% | 26,701.15 | 90.92\% |
| 14 | 37,137.10 | 66.24\% | 27,151.10 | 90.92\% |
| 15 | 168,805.00 | 66.24\% | 123,414.10 | 90.92\% |
| 16 | 45,577.35 | 66.24\% | 33,321.81 | 90.92\% |
| 17 | 16,880.50 | 66.24\% | 12,341.41 | 90.92\% |
| 18 | 26,941.34 | 83.42\% | 12,189.30 | 90.92\% |
| 22 | 4,875.00 | 92.50\% | 0.00 | 92.50\% |
| 23 | 54,035.89 | 84.99\% | 21,354.44 | 90.92\% |
| 24 | 60,435.00 | 83.47\% | 27,236.10 | 90.92\% |
| 27 | 60,842.68 | 71.30\% | 41,598.93 | 90.92\% |
| 28 | 27,819.64 | 71.61\% | 18,923.02 | 90.92\% |
| 29 | 34,064.86 | 71.61\% | 23,171.04 | 90.92\% |
| 30 | 87,500.00 | 65.00\% | 64,804.55 | 90.92\% |
| 31 | 90,198.26 | 84.50\% | 37,367.79 | 90.92\% |
| 32 | 395,164.09 | 76.19\% | 244,466.31 | 90.92\% |
| 35 | 93,602.73 | 66.27\% | 68,410.26 | 90.92\% |
| 36 | 14,625.00 | 96.75\% | 0.00 | 96.75\% |
| 37 | 5,100.00 | 70.00\% | 3,556.71 | 90.92\% |
| 39 | 67,500.00 | 70.00\% | 47,074.10 | 90.92\% |


| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 40 | 14,193.69 | 71.61\% | 9,654.60 | 90.92\% |
| 41 | 116,121.40 | 86.34\% | 38,956.87 | 90.92\% |
| 44 | 12,884.84 | 87.12\% | 3,806.66 | 90.92\% |
| 45 | 69,218.46 | 72.31\% | 46,523.01 | 90.92\% |
| 47 | 82,050.11 | 71.21\% | 56,177.30 | 90.92\% |
| 48 | 70,000.00 | 65.00\% | 51,843.64 | 90.92\% |
| 50 | 264,646.58 | 85.30\% | 101,239.35 | 90.92\% |
| 51 | 34,125.00 | 89.08\% | 5,755.69 | 90.92\% |
| 53 | 137,700.00 | 75.84\% | 85,954.38 | 90.92\% |
| 54 | 33,440.95 | 83.28\% | 15,284.59 | 90.92\% |
| 55 | 24,009.45 | 75.99\% | 14,931.27 | 90.92\% |
| 56 | 2,625.00 | 89.50\% | 355.46 | 90.92\% |
| 57 | 86,677.50 | 66.66\% | 63,074.23 | 90.92\% |
| 58 | 63,000.00 | 65.00\% | 46,659.28 | 90.92\% |
| 59 | 76,174.92 | 76.56\% | 46,670.84 | 90.92\% |
| 61 | 235,975.48 | 85.25\% | 90,724.61 | 90.92\% |
| 62 | 78,750.00 | 79.00\% | 44,706.83 | 90.92\% |
| 63 | 9,520,080.13 | 78.16\% | 0.00 | 78.16\% |
| 64 | 92,453.72 | 81.51\% | 47,062.82 | 90.92\% |
| 65 | 30,000.00 | 70.00\% | 20,921.82 | 90.92\% |
| 66 | 37,425.00 | 96.20\% | 0.00 | 96.20\% |
| 67 | 14,566.40 | 82.45\% | 7,032.46 | 90.92\% |
| 69 | 97,500.00 | 70.00\% | 67,995.92 | 90.92\% |
| 70 | 63,446.19 | 65.00\% | 46,989.74 | 90.92\% |
| 71 | 86,955.23 | 63.62\% | 65,258.38 | 90.92\% |
| 73 | 10,468.30 | 89.53\% | 1,390.12 | 90.92\% |
| 75 | 36,480.28 | 98.11\% | 0.00 | 98.11\% |


| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 76 | 24,709.04 | 75.29\% | 15,630.86 | 90.92\% |
| 78 | 21,600.00 | 83.38\% | 9,798.37 | 90.92\% |
| 79 | 60,250.00 | 69.88\% | 42,093.64 | 90.92\% |
| 80 | 252,586.93 | 65.00\% | 187,071.80 | 90.92\% |
| 81 | 14,193.69 | 71.61\% | 9,654.60 | 90.92\% |
| 82 | 137,552.25 | 72.49\% | 92,161.35 | 90.92\% |
| 83 | 57,324.00 | 71.34\% | 39,167.64 | 90.92\% |
| 84 | 61,821.51 | 69.09\% | 43,665.15 | 90.92\% |
| 86 | 6,000.00 | 70.00\% | 4,184.36 | 90.92\% |
| 90 | 101,697.80 | 71.61\% | 69,175.22 | 90.92\% |
| 91 | 35,000.00 | 65.00\% | 25,921.82 | 90.92\% |
| 92 | 28,387.38 | 71.61\% | 19,309.20 | 90.92\% |
| 93 | 64,500.00 | 70.00\% | 44,981.91 | 90.92\% |
| 106 | 27,411.36 | 78.07\% | 16,063.64 | 90.92\% |
| 107 | 10,350.00 | 79.30\% | 5,810.91 | 90.92\% |
| 108 | 137,627.51 | 88.99\% | 24,150.27 | 90.92\% |
| 109 | 39,208.63 | 73.86\% | 25,591.36 | 90.92\% |
| 114 | 364,192.92 | 65.00\% | 269,729.82 | 90.92\% |
| 115 | 19,250.00 | 80.75\% | 10,171.82 | 90.92\% |
| 116 | 2,284,683.87 | 73.12\% | 1,513,038.62 | 90.92\% |
| 117 | 152,013.63 | 78.28\% | 88,466.37 | 90.92\% |
| 118 | 178,253.82 | 77.72\% | 105,628.38 | 90.92\% |
| 119 | 155,610.00 | 71.34\% | 106,314.58 | 90.92\% |
| 120 | 129,500.00 | 65.00\% | 95,910.74 | 90.92\% |
| 121 | 29,750.00 | 70.25\% | 20,671.82 | 90.92\% |
| 122 | 43,535.68 | 87.10\% | 12,909.25 | 90.92\% |
| 123 | 140,000.00 | 65.00\% | 103,687.28 | 90.92\% |

Case 3:19-cv-01628-LAB-AHG Document 988-2 Filed 04/11/23 PageID. 20878 Page 5 of 13

| Investor Unique <br> Identifier | Allowed Claim <br> Amount | Prior Recovery Rate | Interim Distribution <br> Amount | Distribution <br> Recovery Rate after <br> Interim Distribution <br> Payment |
| :---: | ---: | ---: | ---: | ---: |
| 124 |  |  |  |  |
| 125 | $32,588.72$ | $76,397.26$ | $71.61 \%$ | $\mathbf{2 2 , 1 6 6 . 9 7}$ |

Exhibit A, Page 10

| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 171 | 210,000.00 | 65.00\% | 155,530.92 | 90.92\% |
| 173 | 168,152.47 | 65.00\% | 124,537.66 | 90.92\% |
| 174 | 20,000.00 | 60.00\% | 15,460.91 | 90.92\% |
| 175 | 903,750.00 | 60.17\% | 697,788.80 | 90.92\% |
| 176 | 77,850.00 | 70.00\% | 54,292.12 | 90.92\% |
| 177 | 134,884.55 | 73.02\% | 89,493.65 | 90.92\% |
| 179 | 64,578.00 | 84.61\% | 26,495.04 | 90.92\% |
| 180 | 42,000.00 | 70.00\% | 29,290.55 | 90.92\% |
| 181 | 144,537.44 | 67.15\% | 104,593.45 | 90.92\% |
| 182 | 14,000.00 | 65.00\% | 10,368.73 | 90.92\% |
| 183 | 3,000.00 | 70.00\% | 2,092.18 | 90.92\% |
| 185 | 453,785.43 | 73.75\% | 296,823.71 | 90.92\% |
| 186 | 142,126.51 | 71.40\% | 97,009.66 | 90.92\% |
| 187 | 7,500.00 | 70.00\% | 5,230.46 | 90.92\% |
| 189 | 64,750.00 | 65.00\% | 47,955.37 | 90.92\% |
| 190 | 52,500.00 | 65.00\% | 38,882.73 | 90.92\% |
| 191 | 306,817.58 | 69.23\% | 216,308.13 | 90.92\% |
| 192 | 16,880.50 | 66.24\% | 12,341.41 | 90.92\% |
| 193 | 281,898.64 | 71.81\% | 191,116.85 | 90.92\% |
| 194 | 16,880.50 | 66.24\% | 12,341.41 | 90.92\% |
| 195 | 14,193.69 | 71.61\% | 9,654.60 | 90.92\% |
| 196 | 17,500.00 | 65.00\% | 12,960.91 | 90.92\% |
| 198 | 44,000.00 | 56.00\% | 34,921.82 | 90.92\% |
| 199 | 30,749.66 | 79.50\% | 17,132.39 | 90.92\% |
| 201 | 70,968.46 | 71.61\% | 48,273.01 | 90.92\% |
| 202 | 100,983.53 | 66.34\% | 73,748.99 | 90.92\% |
| 203 | 106,623.27 | 69.54\% | 74,849.64 | 90.92\% |

Exhibit A, Page 11

| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 204 | 85,391.65 | 65.84\% | 62,696.20 | 90.92\% |
| 205 | 11,486.25 | 94.26\% | 0.00 | 94.26\% |
| 206 | 102,900.17 | 68.82\% | 72,942.18 | 90.92\% |
| 208 | 1,600.95 | 98.88\% | 0.00 | 98.88\% |
| 209 | 48,915.87 | 70.00\% | 34,113.63 | 90.92\% |
| 210 | 23,254.32 | 76.75\% | 14,176.14 | 90.92\% |
| 211 | 85,176.71 | 82.96\% | 39,785.81 | 90.92\% |
| 212 | 92,324.66 | 81.54\% | 46,933.76 | 90.92\% |
| 213 | 73,075.75 | 86.71\% | 23,145.76 | 90.92\% |
| 215 | 14,193.69 | 71.61\% | 9,654.60 | 90.92\% |
| 218 | 72,250.00 | 63.88\% | 54,093.64 | 90.92\% |
| 219 | 13,780.31 | 79.58\% | 7,652.54 | 90.92\% |
| 221 | 50,234.58 | 66.24\% | 36,726.77 | 90.92\% |
| 222 | 481,515.04 | 70.37\% | 333,994.62 | 90.92\% |
| 223 | 56,864.27 | 66.24\% | 41,573.84 | 90.92\% |
| 226 | 1,087,500.00 | 70.00\% | 758,415.99 | 90.92\% |
| 229 | 70,000.00 | 65.00\% | 51,843.64 | 90.92\% |
| 230 | 329,000.00 | 67.10\% | 238,218.21 | 90.92\% |
| 231 | 2,002.50 | 98.67\% | 0.00 | 98.67\% |
| 234 | 32,929.37 | 71.61\% | 22,398.68 | 90.92\% |
| 235 | 14,861.11 | 85.14\% | 5,782.93 | 90.92\% |
| 236 | 24,461.08 | 97.36\% | 0.00 | 97.36\% |
| 237 | 599,816.97 | 94.00\% | 0.00 | 94.00\% |
| 238 | 179,203.53 | 82.08\% | 88,421.74 | 90.92\% |
| 239 | 27,300.00 | 79.00\% | 15,498.37 | 90.92\% |
| 240 | 262,500.00 | 65.00\% | 194,413.65 | 90.92\% |
| 243 | 71,062.48 | 71.58\% | 48,367.03 | 90.92\% |

Exhibit A, Page 12

Case 3:19-cv-01628-LAB-AHG Document 988-2 Filed 04/11/23 PageID. 20881 Page 8 of 13

| Investor Unique <br> Identifier | Allowed Claim <br> Amount | Prior Recovery Rate | Interim Distribution <br> Amount | Distribution <br> Recovery Rate after <br> Interim Distribution <br> Payment |
| :---: | ---: | ---: | ---: | ---: |
| 244 |  |  |  | $\mathbf{2 2 , 4 1 9 . 6 2}$ |

Exhibit A, Page 13

Case 3:19-cv-01628-LAB-AHG Document 988-2 Filed 04/11/23 PageID. 20882 Page 9 of 13

| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 282 | 45,000.00 | 70.00\% | 31,382.73 | 90.92\% |
| 283 | 12,411.12 | 75.18\% | 7,872.03 | 90.92\% |
| 285 | 61,364.38 | 82.47\% | 29,590.75 | 90.92\% |
| 287 | 72,387.83 | 75.87\% | 45,153.29 | 90.92\% |
| 288 | 5,436.48 | 93.04\% | 0.00 | 93.04\% |
| 289 | 25,919.59 | 81.81\% | 12,983.18 | 90.92\% |
| 295 | 146,118.58 | 76.99\% | 88,462.87 | 90.92\% |
| 299 | 44,455.07 | 85.18\% | 17,220.53 | 90.92\% |
| 301 | 29,750.00 | 65.00\% | 22,033.55 | 90.92\% |
| 302 | 48,328.05 | 76.43\% | 29,717.78 | 90.92\% |
| 303 | 10,807.50 | 87.96\% | 2,657.56 | 90.92\% |
| 304 | 43,956.16 | 78.02\% | 25,799.80 | 90.92\% |
| 305 | 23,761.20 | 98.43\% | 0.00 | 98.43\% |
| 307 | 452,822.47 | 69.81\% | 316,649.78 | 90.92\% |
| 309 | 3,750.00 | 92.50\% | 0.00 | 92.50\% |
| 310 | 3,000.00 | 70.00\% | 2,092.18 | 90.92\% |
| 311 | 14,658.37 | 94.37\% | 0.00 | 94.37\% |
| 312 | 6,119.40 | 70.00\% | 4,267.63 | 90.92\% |
| 313 | 70,000.00 | 65.00\% | 51,843.64 | 90.92\% |
| 314 | 16,880.50 | 66.24\% | 12,341.41 | 90.92\% |
| 315 | 18,300.00 | 93.71\% | 0.00 | 93.71\% |
| 316 | 99,125.03 | 97.94\% | 0.00 | 97.94\% |
| 317 | 7,019.17 | 97.99\% | 0.00 | 97.99\% |
| 318 | 62,595.59 | 83.08\% | 29,006.33 | 90.92\% |
| 319 | 6,525.00 | 97.25\% | 0.00 | 97.25\% |
| 320 | 8,747.58 | 65.01\% | 6,478.04 | 90.92\% |
| 323 | 84,700.00 | 95.46\% | 0.00 | 95.46\% |

Exhibit A, Page 14

Case 3:19-cv-01628-LAB-AHG Document 988-2 Filed 04/11/23 PageID. 20883 Page 10 of

| Investor Unique <br> Identifier | Allowed Claim <br> Amount | Prior Recovery Rate | Interim Distribution <br> Amount | Distribution <br> Recovery Rate after <br> Interim Distribution <br> Payment |
| :---: | ---: | ---: | ---: | ---: |
| 325 | $45,719.04$ | $81.71 \%$ | $\mathbf{2 3 , 0 2 3 . 5 9}$ | $90.92 \%$ |
| 327 | $190,321.25$ | $65.00 \%$ | $\mathbf{1 4 0 , 9 5 6 . 3 8}$ | $90.92 \%$ |
| 328 | $2,200,482.81$ | $74.32 \%$ | $\mathbf{1 , 4 2 2 , 4 8 2 . 8 3}$ | $90.92 \%$ |
| 329 | $332,208.61$ | $76.27 \%$ | $\mathbf{2 0 5 , 1 1 4 . 1 0}$ | $90.92 \%$ |
| 330 | $74,250.00$ | $67.00 \%$ | $\mathbf{5 3 , 8 2 4 . 1 0}$ | $90.92 \%$ |
| 331 | $19,579.39$ | $73.89 \%$ | $\mathbf{1 2 , 7 7 0 . 7 6}$ | $90.92 \%$ |
| 334 | $17,584.90$ | $82.42 \%$ | $\mathbf{8 , 5 0 6 . 7 2}$ | $90.92 \%$ |
| 335 | $19,871.17$ | $71.61 \%$ | $\mathbf{1 3 , 5 1 6 . 4 4}$ | $90.92 \%$ |
| 336 | $165,044.64$ | $76.42 \%$ | $\mathbf{1 0 1 , 4 9 7 . 3 8}$ | $90.92 \%$ |
| 338 | $148,150.58$ | $65.00 \%$ | $\mathbf{1 0 9 , 7 2 3 . 7 9}$ | $90.92 \%$ |
| 339 | $221,928.14$ | $81.09 \%$ | $\mathbf{1 1 5 , 3 7 3 . 0 1}$ | $90.92 \%$ |
| 340 | $14,193.69$ | $71.61 \%$ | $\mathbf{9}$ | $\mathbf{9 , 6 5 4 . 6 0}$ |

Exhibit A, Page 15

Case 3:19-cv-01628-LAB-AHG Document 988-2 Filed 04/11/23 PageID. 20884 Page 11 of

| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 361 | 82,500.00 | 67.00\% | 59,804.55 | 90.92\% |
| 368 | 27,582.19 | 95.20\% | 0.00 | 95.20\% |
| 370 | 21,290.54 | 71.61\% | 14,481.91 | 90.92\% |
| 372 | 85,822.61 | 82.84\% | 40,431.71 | 90.92\% |
| 373 | 70,000.00 | 65.00\% | 51,843.64 | 90.92\% |
| 375 | 80,484.64 | 84.06\% | 34,639.83 | 90.92\% |
| 376 | 28,387.38 | 71.61\% | 19,309.20 | 90.92\% |
| 377 | 105,534.27 | 78.89\% | 60,143.38 | 90.92\% |
| 378 | 14,193.69 | 71.61\% | 9,654.60 | 90.92\% |
| 380 | 17,568.75 | 89.96\% | 1,681.94 | 90.92\% |
| 381 | 175,000.00 | 69.92\% | 122,192.87 | 90.92\% |
| 382 | 110,459.70 | 65.00\% | 81,809.04 | 90.92\% |
| 383 | 12,750.00 | 74.50\% | 8,210.91 | 90.92\% |
| 384 | 58,593.26 | 90.23\% | 4,124.18 | 90.92\% |
| 385 | 21,546.02 | 88.95\% | 3,843.57 | 90.92\% |
| 387 | 36,903.60 | 71.61\% | 25,101.97 | 90.92\% |
| 388 | 609,888.18 | 68.32\% | 435,133.23 | 90.92\% |
| 389 | 5,406.65 | 81.98\% | 2,683.20 | 90.92\% |
| 390 | 85,798.47 | 78.55\% | 49,485.75 | 90.92\% |
| 391 | 2,047.16 | 97.59\% | 0.00 | 97.59\% |
| 392 | 34,852.00 | 72.29\% | 23,434.11 | 90.92\% |
| 394 | 34,990.33 | 65.01\% | 25,912.15 | 90.92\% |
| 398 | 16,500.00 | 67.00\% | 11,960.91 | 90.92\% |
| 399 | 17,500.00 | 65.00\% | 12,960.91 | 90.92\% |
| 404 | 28,387.38 | 71.61\% | 19,309.20 | 90.92\% |
| 405 | 103,968.79 | 84.34\% | 43,689.68 | 90.92\% |
| 406 | 52,508.14 | 73.74\% | 34,354.50 | 90.92\% |

Exhibit A, Page 16

| Investor Unique Identifier | Allowed Claim Amount | Prior Recovery Rate | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: |
| 411 | 28,387.38 | 71.61\% | 19,309.20 | 90.92\% |
| 412 | 682.50 | 70.00\% | 475.97 | 90.92\% |
| 415 | 337,610.00 | 66.24\% | 246,828.21 | 90.92\% |
| 416 | 49,500.00 | 72.50\% | 33,159.28 | 90.92\% |
| 417 | 23,818.16 | 80.95\% | 12,470.44 | 90.92\% |
| 423 | 28,387.38 | 71.61\% | 19,309.20 | 90.92\% |
| 425 | 2,475.00 | 83.50\% | 1,113.27 | 90.92\% |
| 426 | 19,026.85 | 80.97\% | 9,948.67 | 90.92\% |
| 427 | 343,283.73 | 78.20\% | 200,324.01 | 90.92\% |
| 430 | 6,032.32 | 75.87\% | 3,762.78 | 90.92\% |
| 431 | 36,400.00 | 70.88\% | 25,052.28 | 90.92\% |
| 432 | 56,774.77 | 71.61\% | 38,618.41 | 90.92\% |
| 434 | 28,085.44 | 71.91\% | 19,007.26 | 90.92\% |
| 435 | 32,886.45 | 69.55\% | 23,082.02 | 90.92\% |
| 436 | 61,726.03 | 75.31\% | 39,030.58 | 90.92\% |
| 437 | 68,683.28 | 77.11\% | 41,448.74 | 90.92\% |
| 439 | 14,193.69 | 71.61\% | 9,654.60 | 90.92\% |
| 441 | 650,138.52 | 91.86\% | 0.00 | 91.86\% |
| 442 | 60,000.00 | 70.00\% | 41,843.64 | 90.92\% |
| 443 | 21,000.00 | 79.00\% | 11,921.82 | 90.92\% |
| 446 | 600,000.00 | 70.00\% | 418,436.41 | 90.92\% |
| 447 | 16,500.00 | 67.00\% | 11,960.91 | 90.92\% |
| 448 | 25,500.00 | 74.50\% | 16,421.82 | 90.92\% |
| 450 | 9,000.00 | 70.00\% | 6,276.55 | 90.92\% |
| 451 | 29,750.04 | 70.25\% | 20,671.86 | 90.92\% |

Exhibit A, Page 17

| Investor Unique <br> Identifier | Allowed Claim <br> Amount | Prior Recovery Rate | Interim Distribution <br> Amount | Distribution <br> Recovery Rate after <br> Interim Distribution <br> Payment |
| :---: | ---: | ---: | ---: | ---: |
| Trade and Tax <br> Creditors - See <br> Exhibit B | $1,047,308.31$ | $0.00 \%$ | $\mathbf{9 5 2 , 2 3 1 . 7 8}$ |  |
| Grand Total | $\mathbf{4 3 , 9 3 8 , 0 0 7 . 9 9}$ |  | $\mathbf{2 1 , 0 0 0 , 0 0 0 . 0 0}$ |  |

Note: Unique Identifier 63 (CalPrivate Bank) - a Joint Motion has been filed by the Receiver and CalPrivate Bank for approval of a settlement, which motion is pending. Dkt. 956. If the settlement is approved by the Court, CalPrivate will receive the funds allocated to pay its claim in the receivership in full under the Chicago Title Global Settlement $(\$ 9,520,080.13)$, plus a $\$ 500,000$ settlement payment from the receivership estate. If the settlement is not approved, CalPrivate may choose to pursue its pending appeal of the Chicago Title Global Settlement bar order, in which case the $\$ 9,520,080.13$ will be held back by the Receiver pending the outcome of the appeal. In either event, however, there would be no interim distribution of General Receivership Funds made to CalPrivate (and no payment to Chicago Title on account of its Participation Right relating to CalPrivate's claim) as part of this interim distribution.

| Creditor Type | Creditor | Trade/Tax Creditor Claim Amounts Allowed |  | Interim Distribution Amount |  | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Trade Creditor | A Awesome Backflow Service | \$ | 220.00 | \$ | 200.03 | 90.92\% |
| Trade Creditor | Ace Hardware | \$ | 47.80 | \$ | 43.46 | 90.92\% |
| Trade Creditor | Alpha Graphics | \$ | 4,216.79 | \$ | 3,833.98 | 90.92\% |
| Trade Creditor | American Express National Bank | \$ | 115,524.17 | \$ | 105,036.68 | 90.92\% |
| Trade Creditor | Andrew Edwards | \$ | 4,000.00 | \$ | 3,636.87 | 90.92\% |
| Trade Creditor | Bootstrap Kombucha | \$ | 300.00 | \$ | 272.77 | 90.92\% |
| Tax Creditor | California Department of Tax and Fee Admin | \$ | 3,330.00 | \$ | 3,027.70 | 90.92\% |
| Trade Creditor | Carol Lee Shamon | \$ | 2,116.50 | \$ | 1,924.36 | 90.92\% |
| Trade Creditor | Chef City Restaurant Equipment \& Supplies | \$ | 1,611.10 | \$ | 1,464.84 | 90.92\% |
| Tax Creditor | City Treasurer | \$ | 47,876.45 | \$ | 43,530.14 | 90.92\% |
| Trade Creditor | Colorado Distribution Group | \$ | 4,680.93 | \$ | 4,255.99 | 90.92\% |
| Trade Creditor | Commerical Recovery fo So Media | \$ | 1,711.63 | \$ | 1,556.25 | 90.92\% |
| Trade Creditor | Con \& Coop Beach Rentals LLC | \$ | 237,000.00 | \$ | 215,484.71 | 90.92\% |
| Trade Creditor | Creative Affordable Elegance | \$ | 12,197.50 | \$ | 11,090.19 | 90.92\% |
| Trade Creditor | Daniel Malsack | \$ | 1,520.00 | \$ | 1,382.01 | 90.92\% |
| Trade Creditor | De Novo Legal PC | \$ | 44,129.05 | \$ | 40,122.94 | 90.92\% |
| Trade Creditor | Economy Restaurant Euipment \& Supply Co | \$ | 1,366.84 | \$ | 1,242.76 | 90.92\% |
| Trade Creditor | Evco Par, Inc | \$ | 20,147.80 | \$ | 18,318.75 | 90.92\% |
| Trade Creditor | Ford Motor Credit Company | \$ | 24,077.34 | \$ | 21,891.56 | 90.92\% |
| Trade Creditor | Form-Craft Business Systems | \$ | 661.72 | \$ | 601.65 | 90.92\% |
| Tax Creditor | Franchise Tax Board | \$ | 2,016.48 | \$ | 1,833.42 | 90.92\% |
| Trade Creditor | Futuristech Communications | \$ | 51,819.90 | \$ | 47,115.60 | 90.92\% |
| Trade Creditor | Geocon Consultants, Inc | \$ | 9,000.00 | \$ | 8,182.96 | 90.92\% |
| Trade Creditor | Green Guard Services, Inc | \$ | 5,411.78 | \$ | 4,920.49 | 90.92\% |
| Trade Creditor | Higgs, Fletcher \& Mack LLP | \$ | 8,669.42 | \$ | 7,882.39 | 90.92\% |
| Trade Creditor | Holdren Lietzke Architecture | \$ | 5,652.07 | \$ | 5,138.96 | 90.92\% |
| Trade Creditor | HRG Works Inc | \$ | 6,860.00 | \$ | 6,237.24 | 90.92\% |
| Trade Creditor | J+L Eppig Brewing LLC | \$ | 2,035.00 | \$ | 1,850.26 | 90.92\% |
| Trade Creditor | Jessica White | \$ | 4,832.68 | \$ | 4,393.96 | 90.92\% |
| Trade Creditor | Jose Horna | \$ | 3,534.15 | \$ | 3,213.31 | 90.92\% |

Exhibit B, Page 20

| Creditor Type | Creditor | Trade/Tax Creditor Claim Amounts Allowed |  | Interim Distribution Amount |  | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Trade Creditor | Ken David | \$ | 690.00 | \$ | 627.36 | 90.92\% |
| Trade Creditor | Kermit Lynch Wine Merchant | \$ | 1,584.00 | \$ | 1,440.20 | 90.92\% |
| Trade Creditor | Kombucha on Tap, LLC | \$ | 594.00 | \$ | 540.08 | 90.92\% |
| Trade Creditor | Lucid Enterprises LLC | \$ | 1,756.49 | \$ | 1,597.03 | 90.92\% |
| Trade Creditor | McKinley Elevator Corporation | \$ | 1,109.00 | \$ | 1,008.32 | 90.92\% |
| Trade Creditor | Michelle Schoser | \$ | 17,780.96 | \$ | 16,166.77 | 90.92\% |
| Trade Creditor | Noonan Lance Boyer \& Banach LLP | \$ | 30,863.40 | \$ | 28,061.57 | 90.92\% |
| Trade Creditor | O'Brien's Boulangerie | \$ | 3,263.93 | \$ | 2,967.62 | 90.92\% |
| Trade Creditor | One World Meat Company LLC | \$ | 6,951.00 | \$ | 6,319.98 | 90.92\% |
| Trade Creditor | Pacific Edge Wine Spirits | \$ | 259.67 | \$ | 236.10 | 90.92\% |
| Trade Creditor | Padres, LP | \$ | 1,007.96 | \$ | 916.46 | 90.92\% |
| Trade Creditor | Preeyapa Brandenburg | \$ | 3,440.00 | \$ | 3,127.71 | 90.92\% |
| Trade Creditor | R.W. Smith \& Co | \$ | 14,565.87 | \$ | 13,243.55 | 90.92\% |
| Trade Creditor | Regina C Franco | \$ | 7,962.50 | \$ | 7,239.65 | 90.92\% |
| Trade Creditor | Repro Magic Inc | \$ | 653.77 | \$ | 594.42 | 90.92\% |
| Trade Creditor | Robert Half International | \$ | 8,567.68 | \$ | 7,789.89 | 90.92\% |
| Trade Creditor | San Diego Candle | \$ | 297.36 | \$ | 270.37 | 90.92\% |
| Trade Creditor | Sara Stewart | \$ | 1,200.00 | \$ | 1,091.06 | 90.92\% |
| Trade Creditor | Sarah Sheldon | \$ | 640.00 | \$ | 581.90 | 90.92\% |
| Trade Creditor | Savor Brands, Inc | \$ | 4,281.65 | \$ | 3,892.95 | 90.92\% |
| Trade Creditor | Sign King | \$ | 4,317.04 | \$ | 3,925.13 | 90.92\% |
| Trade Creditor | Sky Inc | \$ | 16,210.19 | \$ | 14,738.60 | 90.92\% |
| Trade Creditor | Smoothreads Inc | \$ | 935.80 | \$ | 850.85 | 90.92\% |
| Trade Creditor | Stehly Farms Organics | \$ | 2,925.00 | \$ | 2,659.46 | 90.92\% |
| Trade Creditor | T7 Architecture Inc | \$ | 24,705.03 | \$ | 22,462.26 | 90.92\% |
| Trade Creditor | The Rodman Law Group LLC | \$ | 23,082.00 | \$ | 20,986.57 | 90.92\% |
| Trade Creditor | Timothy M Cummings | \$ | 140.00 | \$ | 127.29 | 90.92\% |
| Trade Creditor | Tourage Consulting LLC | \$ | 11,000.00 | \$ | 10,001.40 | 90.92\% |
| Trade Creditor | United Plumbing Heating Air Electric | \$ | 34,920.00 | \$ | 31,749.90 | 90.92\% |
| Trade Creditor | US Bank Equipment Finance | \$ | 82,709.17 | \$ | 75,200.68 | 90.92\% |

Exhibit B, Page 21

| Creditor Type | Creditor | Trade/Tax Creditor Claim Amounts Allowed |  | Interim Distribution Amount | Distribution Recovery Rate after Interim Distribution Payment |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Trade Creditor | W.J.R. Bevinco Inc | \$ 3,705.00 | \$ | 3,368.65 | 90.92\% |
| Trade Creditor | Weir Electric | \$ 8,150.25 | \$ | 7,410.36 | 90.92\% |
| Trade Creditor | Wells Fargo Bank N.A. | \$ 80,000.00 | \$ | 72,737.46 | 90.92\% |
| Trade Creditor | Westcott Press | \$ 6,974.40 | \$ | 6,341.25 | 90.92\% |
| Trade Creditor | Winship \& Friedrichs APC | \$ 4,041.00 | \$ | 3,674.15 | 90.92\% |
| Trade Creditor | Workhorse Signs \& Graphic LLC | \$ 9,457.09 | \$ | 8,598.56 | 90.92\% |
| Grand Total |  | \$ 1,047,308.31 | \$ | 952,231.78 |  |


[^0]:    Exhibit A reflects one lump sum for the trade and tax creditors' aggregate allowed claim amount. Exhibit B, as noted below, reflects the detail for the trade and tax creditor with allowed claims.

