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 13 KRISTA L. FREITAG

14 UNITED STATES DISTRICT COURT
 15 SOUTHERN DISTRICT OF CALIFORNIA

17 SECURITIES AND EXCHANGE
 COMMISSION,

18 Plaintiff,

19 v.

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

22 Defendants,

23 AMERICAN NATIONAL
 INVESTMENTS, INC.,

24 Relief Defendant.
 25

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

**THIRTEENTH 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: January 9, 2025
 Time: 1:30 p.m.
 Courtroom: 14A
 Judge: Hon. Todd W. Robinson

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 Thirteenth Interim Application for Payment of Fees and
6 Reimbursement of Expenses (the “Application”). This Application covers the six-
7 month period from January 1, 2024 through June 30, 2024 (the “Application
8 Period”), and seeks approval of \$272,403.45 in fees and \$14,934.23 in expenses,
9 and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees
10 incurred (\$217,922.76) and 100% of the expenses incurred (\$14,934.23).

11 **I. INTRODUCTION.**

12 This equity receivership involves a large, complex, and wide-ranging group
13 of enterprises and assets associated with the Ponzi scheme that is the subject of the
14 Complaint filed by the Securities and Exchange Commission (“Commission”). The
15 Receiver was appointed on September 3, 2019. Dkt. 6.

16 The ordering appointing the Receiver confers broad duties, responsibilities,
17 and powers upon the Receiver, which are designed to allow her to secure, preserve,
18 and protect the assets of the Receivership Entities, conduct a forensic accounting
19 and analysis of the Receivership Entities’ financial transactions, investigate and
20 recover sums transferred to third parties, review and analyze investor and creditor
21 claims, and maximize the amount ultimately available for distribution to investors
22 and creditors. *Id.* The Receiver determined that experienced and qualified counsel
23 was critical to the performance of her duties and obligations under the Appointment
24 Order due to the size and complexity of the receivership estate. Accordingly, the
25 Receiver engaged Allen Matkins to assist with legal issues facing the receivership
26 estate.

27 This Application should be read in conjunction with the Receiver’s
28 Nineteenth and Twentieth Interim Reports and Recommendations, filed on May 15,

1 2024 and August 23, 2024 (Dkts. 1031, 1033), which describe in detail the
 2 Receiver’s activities during the six-month Application Period.

3 This Application seeks approval of \$272,403.45 in fees for a total of 439.40
 4 hours worked, and payment on an interim basis of 80% of that amount, or
 5 \$217,922.76. Allen Matkins has agreed to discount its standard hourly rates by 10%
 6 for this case. The work performed is described task-by-task in **Exhibit A**¹ and is
 7 broken down into the following categories:

8 Category	Hours	Amount
9 General Receivership	5.60	\$4,158.00
10 Asset Investigation & Recovery	0.40	\$297.00
11 Reporting	4.50	\$3,341.25
12 Operations & Asset Sales	1.10	\$816.75
13 Claims & Distributions	5.30	\$3,935.25
14 Third Party Recoveries	10.30	\$7,647.75
15 Employment/Professional Fees	2.10	\$1,559.25
16 General Clawback Claims & Settlements	22.40	\$15,669.45
17 Claims Against Kim Peterson et al.	387.70	\$234,978.75
18 Total Fees	439.40	\$272,403.45

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

23
 24
 25

26 _____
 27 ¹ While Allen Matkins has made efforts to ensure that its billing entries are
 28 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.

1 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.**

2 **A. Categories and Descriptions of Work.**

3 1. General Receivership.

4 Allen Matkins' work in this category relates to the related criminal cases
5 against Gina Champion-Cain and Cris Torres, including communications with the
6 United States Attorney's Office and counsel for Gina Champion-Cain ("GCC")
7 regarding restitution issues. The firm also advised the Receiver on the new filing
8 requirements for the Receivership Entities under the Corporate Transparency Act.
9 The reasonable and necessary fees for Allen Matkins' work in this category total
10 \$4,158.00.

11 2. Asset Investigation & Recovery.

12 The services in this category relate generally to efforts to identify, secure,
13 preserve, investigate and recover receivership assets. During the Application
14 Period, these services focused on the preservation of Google account data for
15 discovery purposes. The reasonable and necessary fees for Allen Matkins' work in
16 this category total \$297.00.

17 3. Reporting.

18 Allen Matkins' services in this category focus on assisting the Receiver in
19 preparing her Eighteenth and Nineteenth Interim Reports and Recommendations,
20 which were filed on February 28, 2024 and May 15, 2024, respectively. Dkt. 1015,
21 1031. The reports includes detailed summaries of the Receiver's activities, funds
22 recovered, real and personal property assets, property taxes, insurance, loans and
23 other investments, investigation of third party claims, pending litigation, and other
24 matters. The reports also detail the receipts and disbursements for the receivership
25 estate since the Receiver's appointment and provides her recommendations for the
26 continued administration of the receivership. The reasonable and necessary fees for
27 Allen Matkins' work in this category total \$3,341.25.

28

1 4. Operations & Asset Sales.

2 Allen Matkins’ work in this category focused on advising the Receiver with
3 respect to the disposition of the receivership estate’s interest in the Casa del Zorro
4 hotel. The reasonable and necessary fees for Allen Matkins’ work in this category
5 total \$816.75.

6 5. Claims & Distributions.

7 Services rendered in this category focus on disputed claims against the
8 receivership estate and distribution of receivership estate assets. Most of the work
9 during the Application Period relating to disputed claims focused on the appeal of
10 the Court’s February 24, 2023 Order approving the Receiver’s recommendations
11 regarding claim amounts, resolving claim disputes, and approving the Receiver’s
12 proposed Distribution Plan (“Claims and Distribution Order”) filed by Kim
13 Peterson, Kim Funding, LLC and ABC Funding Strategies, LLC (“Peterson
14 Parties”). Oral argument in the appeal was held on August 13, 2024.

15 The firm also assisted the Receiver with issues related to disseminating
16 information about the receivership to investors and creditors, including information
17 provided on the receivership website (www.anireceivership.com). The reasonable
18 and necessary fees for Allen Matkins’ work in this category total \$3,935.25.

19 6. Third Party Recoveries.

20 This portion of the Application pertains to work on claims against third
21 parties to recover amounts for the benefit of the receivership estate, but not
22 including Clawback Claims, which have their own category and are discussed
23 below. Allen Matkins assisted the Receiver with issues relating to the Illa Designs /
24 Churilla settlement, which was approved by the Court on April 18, 2023. Dkt. 993.
25 The settlement is expected to generate a recovery of \$265,000 for the receivership
26 estate once the Churillas complete a refinance of their property located in Texas, on
27 which the receivership estate has a recorded Deed of Trust. The reasonable and
28 necessary fees for Allen Matkins’ work in this category total \$7,647.75.

1 7. Employment/Professional Fees

2 Although fee applications are a necessary component of federal equity
3 receiverships, neither the Receiver nor her professionals charge for time spent
4 preparing their own detailed applications. Allen Matkins assisted in preparing the
5 Receiver’s Twelfth Interim Fee Application (covering six months of work) and with
6 meet and confer communications with counsel for the Commission. The fee
7 applications were filed on March 22, 2024. The reasonable and necessary fees for
8 Allen Matkins’ work in this category total \$1,559.25.

9 8. General Clawback Claims & Settlements.

10 This portion of the Application pertains to work on clawback claims against
11 third parties and settlements to recover amounts for the benefit of the receivership
12 estate. Although the vast majority of clawback claims were resolved without any
13 action being filed, there are some where the net winners involved either refused to
14 settle, ignored correspondence from the Receiver's counsel and other attempts to
15 make contact, or disputed the Receiver's accounting without any documentary
16 support. In these instances, Allen Matkins assisted the Receiver in filing and
17 prosecuting clawback actions against the applicable net winners, including preparing
18 complaints, amended complaints (in certain instances), discovery requests, and other
19 pleadings.

20 Allen Matkins’ work in this category during the Application Period focused
21 on two clawback matters that have been fully settled – the Daniel Levene matter and
22 the Valeiras Family Trust matter.² The firm assisted the Receiver with the steps
23 required to complete these settlements and collect the settlement payments. The
24 reasonable and necessary fees for Allen Matkins’ work in this category total

25

26

27 ² The Receiver has previously requested that the narrative for this category of
28 Allen Matkins’ fees be allowed to be filed under seal. However, for this
Application Period, all of the firm’s work pertains to matters that have been fully
resolved and are no longer pending, so there is no need for an under seal filing in
this instance.

1 \$15,669.45. To date, the Receiver has recovered more than \$9.4 million for the
 2 receivership estate through the pursuit of clawback claims, which amount represents
 3 approximately 22% of the total distributions of \$43 million made by the Receiver to
 4 date. With the exception of the Kim Peterson matter discussed below, there is only
 5 one active clawback case remaining (the La Jolla Bridge / D’Agostino matter).

6 9. Claims Against Kim Peterson.

7 This portion of the Application pertains to work on claims against Kim
 8 Peterson and his entities to recover amounts for the benefit of the receivership
 9 estate. Due to the confidential nature of the ongoing legal work on this matter and
 10 the Receiver’s litigation strategy vis-à-vis third parties, the Receiver has filed a
 11 motion concurrently herewith to file this portion of the Application under seal. The
 12 reasonable and necessary fees for Allen Matkins’ work in this category total
 13 \$234,978.75. Kim Peterson and his entities, collectively, are the largest net winner
 14 in the Ponzi scheme, having received and retained approximately \$13 million in net
 15 profits from the scheme and its investors.

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

17 Allen Matkins requests that the Court approve reimbursement of \$14,934.23
 18 in out-of-pocket costs. The itemization of such expenses is summarized below by
 19 billing category.

Category	Total
Service of Process	\$1,900.80
Messenger/FedEx Fees	\$86.12
Court/Filing Fees	\$1,183.95
Duplication	\$2.80
PACER/Research	\$361.50
E-Discovery	\$11,399.06
Total	\$14,934.23

1 **II. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**
2 **ALLOWED.**

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

10 In allowing fees, a court should consider “the time, labor and skill required,
11 but not necessarily that actually expended, in the proper performance of the duties
12 imposed by the court upon the receiver . . . , the fair value of such time, labor and
13 skill measured by conservative business standards, the degree of activity, integrity
14 and dispatch with which the work is conducted and the result obtained.” *United*
15 *States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation
16 marks omitted). In practical terms, receiver and professional compensation thus
17 ultimately rests upon the result of an equitable, multi-factor balancing test involving
18 the “economy of administration, the burden that the estate may be able to bear, the
19 amount of time required, although not necessarily expended, and the overall value of
20 the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d Cir.
21 1970). Regardless of how this balancing test is formulated, no single factor is
22 determinative and “a reasonable fee is based [upon] all circumstances surrounding
23 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
24 Supp. 465, 480 (S.D. Tex. 1974).

25 As a preliminary matter, the Appointment Order confers on the Receiver
26 substantial duties and powers, including to conduct such investigation and discovery
27 as may be necessary to locate and account for all Receivership Assets, to take such
28 action as is necessary and appropriate to assume control over and preserve

1 Receivership Assets, and to employ attorneys and others to investigate and, where
2 appropriate, institute, pursue, and prosecute all claims and causes of action of
3 whatever kind and nature. *See* Appointment Order, Section X.

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

11 Allen Matkins has submitted a detailed fee application which describes the
12 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
13 staff matters as efficiently as possible while remaining cognizant of the complexity
14 of issues presented. As noted above, the request for fees is based on Allen Matkins'
15 customary billing rates charged for comparable services provided in other matters,
16 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
17 4.10 hours of work (\$3,044.25 in fees).

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

28

1 **III. CONCLUSION.**

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

- 3 1. Approving Allen Matkins’ fees of \$272,403.45;
- 4 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
- 5 \$217,922.76, from the assets of the Receivership Entities;
- 6 3. Approving Allen Matkins’ costs in the amount of \$14,934.23, and
- 7 authorizing and directing the Receiver to reimburse such costs in full; and
- 8 4. For such other and further relief as the Court deems appropriate.

9
10 Dated: October 11, 2024

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

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
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EXHIBIT A

EXHIBIT A

07/26/24 17:51:52 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: 05/05/24 Matter Name: SEC v. Champion-Cain - General Receivers
 Proforma Number: 1284933
 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		
03/08/24	9541776	Call/emails from creditor regarding vehicle loan made to Champion-Cain and default on same (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.80	594.00	594.00	WO	HD	TR	_____
06/04/24	9647989	Communications with counsel for CTC regarding issues relating to Champion-Cain restitution order	Fates, Edward (Ted)	0.30	222.75	816.75	WO	HD	TR	_____
06/05/24	9648973	Call/emails with AUSA regarding Champion-Cain motion to reduce restitution order amount and response to same (.7) discuss same with Receiver (.4) communications with counsel for CTC re: same (.2)	Fates, Edward (Ted)	1.30	965.25	1,782.00	WO	HD	TR	_____
06/18/24	9664709	Analyze and advise Receiver on US Attorney request for update on investor net loss amounts and schedule showing same (.6) communications with AUSA re: same (.2) analyze Corporate Transparency Act requirements and beneficial owner reports required for receivership entities (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	965.25	2,747.25	WO	HD	TR	_____

07/26/24 17:51:52 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		
06/24/24	9673568	Call/emails with Receiver and AUSA re: Champion restitution issue and investor net losses	Fates, Edward (Ted)	1.40	1,039.50	3,786.75	WO	HD	TR	_____
06/26/24	9674365	Advise Receiver on Corporate Transparency Act filing requirements for receivership entities	Fates, Edward (Ted)	0.20	148.50	3,935.25	WO	HD	TR	_____
06/27/24	9675447	Respond to inquiry from defense counsel for Champion-Cain re status and anticipated timing of closing receivership	Fates, Edward (Ted)	0.30	222.75	4,158.00	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
01/01/24	2864993	EDISC – CS Disco, Inc. - Monthly Hosting for January 2024	0.00	1,870.85	WO	HD	TR	_____
01/17/24	2882563	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	4.50	WO	HD	TR	_____
01/25/24	2866530	MSNGR – Messenger - First Legal LLC - SDSC-SAN DIEGO	0.00	21.25	WO	HD	TR	_____
01/29/24	2860821	FILING – One Legal - Filing fee for Superior Court of California, San Diego County, Motion for Sanctions, Declaration, Request for Judicial Notice, Proof of Service	0.00	71.96	WO	HD	TR	_____
01/29/24	2860822	FILING – One Legal - Filing fee for Superior Court of California, San Diego County, Demurrer, Memorandum of Points and Authorities, Declaration, Request for Judicial Notice	0.00	446.96	WO	HD	TR	_____
01/29/24	2882556	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	1.10	WO	HD	TR	_____
02/01/24	2864657	EDISC – CS Disco, Inc. - Monthly Hosting for February 2024	0.00	1,870.85	WO	HD	TR	_____
02/01/24	2882555	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	0.60	WO	HD	TR	_____

07/26/24 17:51:52 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				
02/07/24	2882561	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	0.80	WO	HD	TR	_____
02/28/24	2882558	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	2.60	WO	HD	TR	_____
03/01/24	2869097	EDISC – CS Disco, Inc. - Monthly Hosting for March 2024	0.00	1,870.85	WO	HD	TR	_____
03/14/24	2882557	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	0.50	WO	HD	TR	_____
03/14/24	2882559	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	0.10	WO	HD	TR	_____
03/22/24	2868947	FILING – One Legal - Filing Fee for Superior Court of California, San Diego County, Reply to Opposition of Noticed Motion and Supporting Declarations, Proof of Service	0.00	11.96	WO	HD	TR	_____
03/22/24	2868948	FILING – One Legal - Filing Fee for Superior Court of California, San Diego County, Reply to Opposition of Noticed Motion and Supporting Declarations, Proof of Service	0.00	11.96	WO	HD	TR	_____
03/22/24	2875087	POS – Service of Process - Nationwide Legal LLC - John Ryan Flanagan, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION; SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION	0.00	237.00	WO	HD	TR	_____
03/22/24	2880181	POS – Service of Process - Nationwide Legal LLC - Loretta Jean Cruz - Loretta Jean Cruz	0.00	653.80	WO	HD	TR	_____
03/29/24	2874882	INV – Nationwide Legal, LLC - Stakeout	0.00	915.00	WO	HD	TR	_____
03/29/24	2874883	POS – Nationwide Legal, LLC - Service of Process	0.00	95.00	WO	HD	TR	_____
03/31/24	2875241	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for March 2024	0.00	936.00	WO	HD	TR	_____
03/31/24	2882560	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	0.10	WO	HD	TR	_____
03/31/24	2882562	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	0.60	WO	HD	TR	_____

07/26/24 17:51:52 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	WO	HD	TR	
04/01/24	2874824	EDISC – CS Disco, Inc. - Monthly Hosting for April 2024	0.00	2,558.26	WO	HD	TR	_____
04/03/24	2872424	FILING – One Legal - Filing fee for Superior Court of California, San Diego County, Stipulation - Other - Fee Due, Proof of Service	0.00	31.96	WO	HD	TR	_____
04/04/24	2875347	DCSRCH – First Legal Network, LLC - USDC-SAN DIEGO; ABSTRACT OF JUDGMENT-CIVIL	0.00	106.20	WO	HD	TR	_____
04/04/24	2875348	FILING – First Legal Network, LLC - SAN DIEGO COUNTY RECORDER; ABSTRACT OF JUDGMENT-CIVIL	0.00	212.00	WO	HD	TR	_____
04/30/24	2879541	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for April 2024	0.00	568.75	WO	HD	TR	_____
05/01/24	2876885	BW – Duplication - Black & White Copies	28.00	2.80	WO	HD	TR	_____
05/01/24	2879561	MSNGR – First Legal Network, LLC - FIRST LEGAL; ACKNOWLEDGMENT OF SATISFACTION OF JUDGMENT	0.00	21.25	WO	HD	TR	_____
05/01/24	2879562	FILING – First Legal Network, LLC - SAN DIEGO COUNTY RECORDER; ACKNOWLEDGMENT OF SATISFACTION OF JUDGMENT	0.00	132.95	WO	HD	TR	_____
05/08/24	2881405	RSRCH – WestLaw	0.00	78.80	WO	HD	TR	_____
05/13/24	2884124	COURT – Other Court Charges - Matt Pham - SD SUPERIOR CRT ROA - Purchased pleadings.	0.00	2.00	WO	HD	TR	_____
05/13/24	2884125	COURT – Other Court Charges - Matt Pham - SD SUPERIOR CRT ROA - Purchased pleadings.	0.00	47.00	WO	HD	TR	_____
05/13/24	2884126	COURT – Other Court Charges - Matt Pham - SD SUPERIOR CRT ROA - Purchased pleadings.	0.00	16.20	WO	HD	TR	_____
05/15/24	2879565	MSNGR – First Legal Network, LLC - USDC-SAN DIEGO; Deliver Courtesy	0.00	21.25	WO	HD	TR	_____
05/16/24	2884133	COURT – Other Court Charges - Matt Pham - COURTS/USBC-CA-S - Filing a Motion for Relief from Stay in the ANI License Fund Bankruptcy.	0.00	199.00	WO	HD	TR	_____
05/31/24	2885234	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for May 2024	0.00	1,043.50	WO	HD	TR	_____
05/31/24	2885240	EDISC – Sandline Discovery LLC - Everlaw eDiscovery	0.00	680.00	WO	HD	TR	_____

07/26/24 17:51:52 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		
06/14/24	2886652	technology and services for May 2024 RSRCH – WestLaw	0.00	165.60	WO	HD TR
06/18/24	2885651	MSNGR – Federal Express - Ship To: Ming Cheng	0.00	22.37	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.60	742.50	4,158.00
		5.60		\$4,158.00
Subtotal Fees				\$4,158.00
Discount				0.00
Total Fees				4,158.00
Total Disbursements				14,934.23

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	188.00	0.00	188.00	19,092.23	4,158.00	14,934.23	573,580.85	92,882.70	480,698.15
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	11,245.39	0.45	11,244.94
Billed	0.00	0.00	0.00	95,639.19	8,569.35	87,069.84	88,724.25	88,724.25	465,763.92
Collected	0.00	0.00	0.00	78,664.19	8,569.35	70,094.84	537,513.17	88,724.25	448,788.92
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	16,975.00	0.00	16,975.00

07/26/24 17:51:52 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

	Total	Fees	Costs
WIP	926.20	4,158.00	-3,231.80
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

07/26/24 17:51:53 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: 05/05/24 Matter Name: SEC v. Champion-Cain - Asset Investigati
 Proforma Number: 1284933
 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
02/20/24	9519830	Discuss Google data preservation and retention issues with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.40	297.00	297.00	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.40	742.50	297.00
		0.40		\$297.00
	Subtotal Fees			\$297.00
	Discount			0.00
	Total Fees			297.00
	Total Disbursements			0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

07/26/24 17:51:53 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	297.00	297.00	0.00	466,729.00	457,600.50	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
Billed	0.00	0.00	0.00	27,710.10	27,710.10	0.00	453,032.37	453,032.37	9,128.50
Collected	0.00	0.00	0.00	27,710.10	27,710.10	0.00	462,160.87	453,032.37	9,128.50
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	2,395.50	297.00	2,098.50						
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

07/26/24 17:51:55 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: 05/05/24 Matter Name: SEC v. Champion-Cain - Reporting
 Proforma Number: 1284933
 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		
02/20/24	9519325	Work on Receiver's 18th interim report (1.3) discuss same with Receiver (.2) meet and confer communications with SEC counsel (.1)	Fates, Edward (Ted)	1.60	1,188.00	1,188.00	WO	HD	TR	_____
02/27/24	9528057	Meet and confer communications with SEC counsel regarding 18th report (.2) communications with Receiver re: revisions to report (.2)	Fates, Edward (Ted)	0.40	297.00	1,485.00	WO	HD	TR	_____
02/28/24	9531804	Revisions to 18th interim report (.3) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.60	445.50	1,930.50	WO	HD	TR	_____
04/29/24	9602500	Work on Receiver's 19th interim report (.8) discuss same with Receiver (.3) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.30	965.25	2,895.75	WO	HD	TR	_____
05/14/24	9622195	Meet and confer with SEC counsel re: 19th interim report, finalize same	Fates, Edward (Ted)	0.60	445.50	3,341.25	WO	HD	TR	_____

Proforma Summary

07/26/24 17:51:55 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.50	742.50	3,341.25
		<u>4.50</u>		<u>\$3,341.25</u>
Subtotal Fees				\$3,341.25
Discount				0.00
Total Fees				3,341.25
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	3,341.25	3,341.25	0.00	88,775.55	88,775.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	6,264.00	6,264.00	0.00	85,434.30	85,434.30	0.00
Collected	0.00	0.00	0.00	6,264.00	6,264.00	0.00	85,434.30	85,434.30	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	3,341.25	3,341.25	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

07/26/24 17:51:55 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

07/26/24 17:51:56 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: 04/04/24 Matter Name: SEC v. Champion-Cain - Operations & Asse
 Proforma Number: 1284933
 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		
01/10/24	9473985	Discuss potential offer to buyout ANI interest in Casa del Zorro with Receiver and issues re: same with Receiver	Fates, Edward (Ted)	0.40	297.00	297.00	WO	HD	TR	_____
05/10/24	9617213	Discuss issues relating to Casa del Zorro investment and membership interest with Receiver	Fates, Edward (Ted)	0.30	222.75	519.75	WO	HD	TR	_____
06/05/24	9649096	Communications with Receiver and G. Rodriguez re: issues relating to ANI interest in Casa del Zorro resort and amendment to operating agreement	Fates, Edward (Ted)	0.40	297.00	816.75	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.10	742.50	816.75
		1.10		\$816.75
	Subtotal Fees			\$816.75
	Discount			0.00
	Total Fees			816.75
	Total Disbursements			0.00

07/26/24 17:51:56 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	816.75	816.75	0.00	743,895.45	743,895.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	344.25	344.25	0.00	743,078.70	743,078.70	0.00
Collected	0.00	0.00	0.00	344.25	344.25	0.00	743,078.70	743,078.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	816.75	816.75	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

07/26/24 17:51:57 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: 05/05/24 Matter Name: SEC v. Champion-Cain - Claims & Distribu
 Proforma Number: 1284933
 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		
01/08/24	9498622	Communications with counsel for Peterson regarding briefing for Peterson appeal of order on claims and distributions	Fates, Edward (Ted)	0.50	371.25	371.25	WO	HD	TR	_____
01/25/24	9489472	Analyze Peterson reply brief in appeal of claims and distribution order (1.1) advise Receiver re: same and plan for oral argument (.4)	Fates, Edward (Ted)	1.50	1,113.75	1,485.00	WO	HD	TR	_____
02/07/24	9506892	Call from investor with inquiries regarding remaining litigation matters and future distributions	Fates, Edward (Ted)	0.40	297.00	1,782.00	WO	HD	TR	_____
02/09/24	9508318	Analyze levy order against trade creditor claimant and advise Receiver re: same	Fates, Edward (Ted)	0.50	371.25	2,153.25	WO	HD	TR	_____
02/09/24	9508646	Call from investor with questions concerning Kim Peterson and CTC litigation	Fates, Edward (Ted)	0.40	297.00	2,450.25	WO	HD	TR	_____
03/19/24	9553789	Respond to investor inquiry regarding litigation documents and exhibits	Fates, Edward (Ted)	0.40	297.00	2,747.25	WO	HD	TR	_____

07/26/24 17:51:57 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		
04/23/24	9596100	Communications with counsel for CTC regarding oral argument scheduling for pending appeals	Fates, Edward (Ted)	0.30	222.75	2,970.00	WO	HD	TR	_____
04/25/24	9598698	Analyze notice from Ninth Circuit regarding oral argument scheduling for pending appeals and available dates	Fates, Edward (Ted)	0.20	148.50	3,118.50	WO	HD	TR	_____
04/30/24	9604903	Analyze oral argument scheduling issues and related filings for appeal of settlement bar order	Fates, Edward (Ted)	0.20	148.50	3,267.00	WO	HD	TR	_____
05/02/24	9609705	Respond to investor call relating to reassignment of cases and impact of same	Fates, Edward (Ted)	0.20	148.50	3,415.50	WO	HD	TR	_____
05/16/24	9624387	Analyze credit card merchant class settlement notice issued to Patio restaurants and advise Receiver re: same	Fates, Edward (Ted)	0.40	297.00	3,712.50	WO	HD	TR	_____
05/24/24	9634202	Assist Receiver in responding to media inquiry regarding future distributions and timing of same	Fates, Edward (Ted)	0.30	222.75	3,935.25	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.30	742.50	3,935.25
		5.30		\$3,935.25
Subtotal Fees				\$3,935.25
Discount				0.00
Total Fees				3,935.25
Total Disbursements				0.00

Attorney Billing Instructions

07/26/24 17:51:57 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD		Calendar YTD				LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	966.60	966.60	0.00	4,901.85	4,901.85	0.00	782,661.60	782,661.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.99	0.99	0.00
Billed	0.00	0.00	0.00	194,284.35	194,284.35	0.00	777,760.74	777,760.74	0.00
Collected	0.00	0.00	0.00	194,284.35	194,284.35	0.00	777,760.74	777,760.74	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	4,901.85	4,901.85	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

07/26/24 17:51:59 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00007 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 05/05/24 Matter Name: SEC v. Champion-Cain - Third Party Recov
 Proforma Number: 1284933
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/02/24	9501897	Communications with E. Churilla regarding settlement payment and refinance of Texas property	Fates, Edward (Ted)	0.30	222.75	222.75	WO	HD	TR	_____
04/09/24	9604402	Call with E. Churilla regarding settlement and refinance of property to payoff same (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	445.50	668.25	WO	HD	TR	_____
04/22/24	9594051	Communications with E. Churilla regarding settlement payment and timing	Fates, Edward (Ted)	0.50	371.25	1,039.50	WO	HD	TR	_____
04/23/24	9596068	Further communications with E. Churilla regarding refinance of property, settlement payment and timing (.4) advise Receiver re: same (.3) communications with escrow company regarding settlement payoff and lien release (.5)	Fates, Edward (Ted)	1.20	891.00	1,930.50	WO	HD	TR	_____
04/24/24	9597022	Communications with Receiver and escrow company for Churilla refinance re: payoff and wire instructions	Fates, Edward (Ted)	0.30	222.75	2,153.25	WO	HD	TR	_____

07/26/24 17:51:59 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/29/24	9601269	Communications with escrow for Churilla refinance regarding timing of loan closing and release of Deed of Trust	Fates, Edward (Ted)	0.20	148.50	2,301.75	WO	HD	TR	_____
04/30/24	9603804	Communications with E. Churilla re: refinance, settlement payment and lien release (.3) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.40	297.00	2,598.75	WO	HD	TR	_____
05/02/24	9609889	Analyze order setting settlement disposition conference and advise E. Churilla re: same	Fates, Edward (Ted)	0.50	371.25	2,970.00	WO	HD	TR	_____
05/07/24	9614356	Communications with E. Churilla regarding delay in closing of refinance and settlement payment	Fates, Edward (Ted)	0.40	297.00	3,267.00	WO	HD	TR	_____
05/08/24	9615509	Communications with E. Churilla regarding status and timing of refinance and settlement payoff from escrow	Fates, Edward (Ted)	0.30	222.75	3,489.75	WO	HD	TR	_____
05/10/24	9617426	Attend settlement disposition conference for Illa Designs / Churilla matter (.3) work on joint motion to extend deadline to file answer and proposed order re: same (.8) communications with E. Churilla re: same (.3)	Fates, Edward (Ted)	1.40	1,039.50	4,529.25	WO	HD	TR	_____
05/14/24	9622345	Communications with E. Churilla regarding order granting extension of answer deadline and status of loan closing / settlement payoff	Fates, Edward (Ted)	0.30	222.75	4,752.00	WO	HD	TR	_____
05/21/24	9629764	Communications with E. Churilla regarding delay in settlement payoff from escrow	Fates, Edward (Ted)	0.30	222.75	4,974.75	WO	HD	TR	_____
06/03/24	9646772	Communications with E. Churilla re: status and timing of loan refinance and settlement	Fates, Edward (Ted)	0.20	148.50	5,123.25	WO	HD	TR	_____

07/26/24 17:51:59 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Fees for Matter 378827.00007.(SEC v. Champion-Cain - Third Party Recov)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/06/24	9650005	Communications with E. Churilla regarding title issues and closing of refinance for settlement payoff	Fates, Edward (Ted)	0.40	297.00	5,420.25	WO	HD	TR	_____
06/10/24	9653687	Emails/call with title insurance company regarding Churilla refinance, purged liens still to be removed from title, and timing (.4) emails/call with law clerk for Judge Goddard re: same (.6) work on joint motion and proposed order to extend defendants' deadline to respond to complaint (.9) discuss same with Receiver (.4) communications with E. Churilla re: same (.4) analyze order setting further settlement disposition conference (.1)	Fates, Edward (Ted)	2.80	2,079.00	7,499.25	WO	HD	TR	_____
06/11/24	9656338	Review order approving joint motion and inform Churillas re: same	Fates, Edward (Ted)	0.20	148.50	7,647.75	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	10.30	742.50	7,647.75
		10.30		\$7,647.75
Subtotal Fees				\$7,647.75
Discount				0.00
Total Fees				7,647.75
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold
 () BILL FEES ONLY () Write Off

07/26/24 17:51:59 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

() BILL COST ONLY () Transfer All

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,013.75	2,013.75	0.00	9,661.50	9,661.50	0.00	1,043,209.35	1,043,209.35	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	78.49	68.49	10.00
Billed	0.00	0.00	0.00	27,329.40	27,329.40	0.00	1,033,482.60	1,033,482.60	0.00
Collected	0.00	0.00	0.00	27,329.40	27,329.40	0.00	1,033,482.60	1,033,482.60	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	9,661.50	9,661.50	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

07/26/24 17:52:00 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: 05/05/24 Matter Name: SEC v. Champion-Cain - Employment/Fees
 Proforma Number: 1284933
 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		
03/06/24	9539103	Revisions to Receiver's 12th interim fee application (.8) discuss same with Receiver (.1) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.10	816.75	816.75	WO	HD	TR	_____
03/18/24	9557632	Meet and confer communications with SEC counsel regarding 12th interim fee applications	Fates, Edward (Ted)	0.30	222.75	1,039.50	WO	HD	TR	_____
03/22/24	9557633	Finalize Receiver's 12th fee application, notice of hearing and proposed order (.4) communications with Receiver re: same (.2) call with Court chambers to obtain hearing date (.1)	Fates, Edward (Ted)	0.70	519.75	1,559.25	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.10	742.50	1,559.25
		2.10		\$1,559.25
Subtotal Fees				\$1,559.25
Discount				0.00

07/26/24 17:52:00 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
	Total Fees			1,559.25
	Total Disbursements			0.00

Attorney Billing Instructions

<input type="checkbox"/>	BILL ALL	<input type="checkbox"/>	Hold
<input type="checkbox"/>	BILL FEES ONLY	<input type="checkbox"/>	Write Off
<input type="checkbox"/>	BILL COST ONLY	<input type="checkbox"/>	Transfer All

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,559.25	1,559.25	0.00	18,443.25	18,443.25	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	4,827.60	4,827.60	0.00	16,884.00	16,884.00	0.00
Collected	0.00	0.00	0.00	4,827.60	4,827.60	0.00	16,884.00	16,884.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	1,559.25	1,559.25	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

07/26/24 17:52:00 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

San Diego, CA 92101

07/26/24 17:52:01 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00011 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 05/05/24 Matter Name: General Clawback Claims & Settlements
 Proforma Number: 1284933
 Client/Matter Joint Group # 378827-1 Client Matter Number:

Fees for Matter 378827.00011.(General Clawback Claims & Settlements)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/13/24	9547121	Communications with Receiver and counsel for Levene regarding final two settlement payments and release of lien / satisfaction of judgment (.6) communications with local counsel in NY (.4) work on notice of satisfaction of judgment (.5)	Fates, Edward (Ted)	1.50	1,113.75	1,113.75	WO	HD	TR	_____
03/14/24	9548245	Communications with counsel for Levene (.3) finalize acknowledgement of satisfaction of judgment (.2) communications with local counsel in NY (.3)	Fates, Edward (Ted)	0.80	594.00	1,707.75	WO	HD	TR	_____
03/18/24	9554398	Communications with local counsel in NY regarding release of Levene judgment lien (.4) advise on e-discovery document management and organizational issues (.5)	Fates, Edward (Ted)	0.90	668.25	2,376.00	WO	HD	TR	_____
03/20/24	9555031	Communications with local counsel in NY re: Levene matter	Fates, Edward (Ted)	0.60	445.50	2,821.50	WO	HD	TR	_____
03/21/24	9556889	Communications with local counsel in NY regarding Levene payoff and release of lien	Fates, Edward (Ted)	0.50	371.25	3,192.75	WO	HD	TR	_____

07/26/24 17:52:01 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Fees for Matter 378827.00011.(General Clawback Claims & Settlements)

Trans Date	Index	Description of Service Rendered (.3) communications with counsel for Levene re: same (.2)	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/22/24	9558019	Advise on e-discovery and document management issues for pending cases	Fates, Edward (Ted)	0.20	148.50	3,341.25	WO	HD	TR	_____
03/29/24	9565890	Analyze order granting summary judgment and prejudgment interest (.7) discuss same and next steps with Receiver (.4) analyze information relating to VFT properties and advise on judgment lien issues (.5)	Fates, Edward (Ted)	1.60	1,188.00	4,529.25	WO	HD	TR	_____
03/29/24	9569236	[VALEIRAS] Review and analyze court's order/memorandum decision granting summary judgment motion	Pham, Matt D.	0.30	164.70	4,693.95	WO	HD	TR	_____
04/01/24	9578586	[VALEIRAS] Research applicable local rules on abstract of judgment and begin preparing praecape and abstract of judgment	Pham, Matt D.	1.20	658.80	5,352.75	WO	HD	TR	_____
04/02/24	9578594	[VALEIRAS] Research regarding FRCP 62(a)'s scope and whether it includes recording of abstract of judgment (0.8); Update and revise praecape abstract of judgment (0.2)	Pham, Matt D.	1.00	549.00	5,901.75	WO	HD	TR	_____
04/03/24	9578604	[VALEIRAS] Finalize praecape and abstract of judgment for filing and recordation	Pham, Matt D.	0.20	109.80	6,011.55	WO	HD	TR	_____
04/04/24	9575863	Communications with counsel for Valeiras re: judgment, appeal and bond	Fates, Edward (Ted)	0.80	594.00	6,605.55	WO	HD	TR	_____
04/05/24	9578638	[VALEIRAS] Email correspondence with Ted Fates regarding case authority on recording abstract of judgment	Pham, Matt D.	0.20	109.80	6,715.35	WO	HD	TR	_____

07/26/24 17:52:01 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Fees for Matter 378827.00011.(General Clawback Claims & Settlements)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/08/24	9578205	Advise on e-discovery and cost management issues (.2) settlement communications with counsel for VFT (.4) discuss same with Receiver (.4) analyze post-judgment interest issue (.3)	Fates, Edward (Ted)	1.30	965.25	7,680.60	WO	HD	TR	_____
04/09/24	9604405	Analysis re: post-judgment interest rate for VFT judgment and communications with Receiver re: same (.5) call with counsel for VFT re: settlement issues (.4)	Fates, Edward (Ted)	0.90	668.25	8,348.85	WO	HD	TR	_____
04/17/24	9589018	Analyze issues relating to lien securing judgment against VFT (.5) communications with G. Rodriguez re: same (.4)	Fates, Edward (Ted)	0.90	668.25	9,017.10	WO	HD	TR	_____
04/17/24	9589871	Telephone call with Mr. Fates regarding abstract of judgment (0.1); review and analysis of recording of abstract of judgment and effect on Valeiras properties (0.5); prepare email with analysis of abstract of judgment (0.3); review and respond to related emails (0.1); telephone call to title company (0.1)	Kaup, John	1.10	400.95	9,418.05	WO	HD	TR	_____
04/18/24	9591055	Telephone call from title company representative regarding effect of abstract of judgment on title (0.1); send follow up email to Mr. Fates (0.1).	Kaup, John	0.20	72.90	9,490.95	WO	HD	TR	_____
04/23/24	9596270	Settlement communications with counsel for VFT (.7) discuss same with Receiver (.3) analyze settlement bar order issue (.6)	Fates, Edward (Ted)	1.60	1,188.00	10,678.95	WO	HD	TR	_____
04/24/24	9596982	Settlement communications with counsel for VFT (.4) discuss same with Receiver (.5)	Fates, Edward (Ted)	2.60	1,930.50	12,609.45	WO	HD	TR	_____

07/26/24 17:52:01 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Fees for Matter 378827.00011.(General Clawback Claims & Settlements)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		work on settlement agreement and judgment satisfaction / lien release documents (1.7)								
04/25/24	9597969	Analyze Receiver comments to VFT settlement agreement and work on revisions to same (.6) communications with Receiver and counsel for Valeiras re: same (.4) work on acknowledgment of satisfaction of judgment (.3) analyze revisions to settlement agreement from counsel for VFT and discuss same with Receiver (.5) finalize settlement agreement for execution (.3)	Fates, Edward (Ted)	2.10	1,559.25	14,168.70	WO	HD	TR	_____
04/26/24	9599111	Communications with Receiver and counsel for VFT re: execution of settlement agreement and wire transfer of settlement funds	Fates, Edward (Ted)	0.40	297.00	14,465.70	WO	HD	TR	_____
04/29/24	9601552	Communications with counsel for VFT re: wire transfer of settlement funds and confirmation of same	Fates, Edward (Ted)	0.30	222.75	14,688.45	WO	HD	TR	_____
04/30/24	9604452	Advise on recording and filing of acknowledgment of satisfaction of judgment for VFT settlement	Fates, Edward (Ted)	0.30	222.75	14,911.20	WO	HD	TR	_____
05/02/24	9609578	Advise Receiver re: orders reassigning remaining clawback cases (.2) finalize satisfaction of judgment for VFT matter (.1)	Fates, Edward (Ted)	0.30	222.75	15,133.95	WO	HD	TR	_____
05/02/24	9610486	Evaluate the court orders/filings, address the transition of cases and call with counsel related to the status of cases and appeals, follow-up thereon .	Zaro, David	0.40	387.00	15,520.95	WO	HD	TR	_____

07/26/24 17:52:01 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Fees for Matter 378827.00011.(General Clawback Claims & Settlements)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
05/03/24	9610549	Communications with counsel for VFT regarding release of judgment lien and recording of same	Fates, Edward (Ted)	0.20	148.50	15,669.45	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	967.50	387.00
000820	Kaup, John	1.30	364.50	473.85
001665	Fates, Edward (Ted)	17.80	742.50	13,216.50
002510	Pham, Matt D.	2.90	549.00	1,592.10
		<u>22.40</u>		<u>\$15,669.45</u>
Subtotal Fees				\$15,669.45
Discount				0.00
Total Fees				15,669.45
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/>	BILL ALL	<input type="checkbox"/>	Hold
<input type="checkbox"/>	BILL FEES ONLY	<input type="checkbox"/>	Write Off
<input type="checkbox"/>	BILL COST ONLY	<input type="checkbox"/>	Transfer All

Billing Instructions

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/26/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	15,669.45	15,669.45	0.00	1,417,159.80	1,417,159.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	149,072.40	149,072.40	0.00
Billed	0.00	0.00	0.00	410,867.10	410,867.10	0.00	1,401,490.35	1,401,490.35	0.00

07/26/24 17:52:01 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Collected	0.00	0.00	0.00	410,867.10	410,867.10	0.00	1,401,490.35	1,401,490.35	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	15,669.45	15,669.45	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
