

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

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

12 Attorneys for Receiver  
KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA  
15

16 SECURITIES AND EXCHANGE  
17 COMMISSION,

18 Plaintiff,

19 v.

20 GINA CHAMPION-CAIN and ANI  
DEVELOPMENT, LLC,

21 Defendants,

22 AMERICAN NATIONAL  
23 INVESTMENTS, INC.,

24 Relief Defendant.  
25  
26  
27  
28

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

**FOURTEENTH 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: July 1, 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 Fourteenth Interim Application for Payment of Fees and  
6 Reimbursement of Expenses (the “Application”). This Application covers the six-  
7 month period from July 1, 2024 through December 31, 2024 (the “Application  
8 Period”), and seeks approval of \$113,739.30 in fees and \$13,709.09 in expenses,  
9 and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees  
10 incurred (\$90,991.44) and 100% of the expenses incurred (\$13,709.09).

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 Twenty-  
28 First Interim Report and Recommendations, filed on January 27, 2025 (Dkt. 1062),

1 which describe in detail the Receiver’s activities during the six-month Application  
2 Period.

3 This Application seeks approval of \$113,739.30 in fees for a total of 153.10  
4 hours worked, and payment on an interim basis of 80% of that amount, or  
5 \$90,991.44. 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**<sup>1</sup> and is  
7 broken down into the following categories:

8 <b>Category</b>	<b>Hours</b>	<b>Amount</b>
9 General Receivership	3.10	\$2,497.05
10 Reporting	4.60	\$3,705.30
11 Operations & Asset Sales	0.50	\$402.75
12 Claims & Distributions	44.90	\$32,293.80
13 Third Party Recoveries	23.80	\$19,170.90
14 Employment/Professional Fees	1.90	\$1,530.45
15 General Clawback Claims & Settlements	13.20	\$9,895.50
16 Claims Against Kim Peterson et al.	61.10	\$44,243.55
17 <b>Total Fees</b>	153.10	\$113,739.30

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

22  
23  
24  
25

26 \_\_\_\_\_  
27 <sup>1</sup> 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 \$2,497.05.

11 2. Reporting.

12 Allen Matkins' services in this category focus on assisting the Receiver in  
13 preparing her Twentieth and Twenty-First Interim Reports and Recommendations,  
14 which were filed on August 23, 2024 and January 27, 2025, respectively. Dkt.  
15 1033, 1062. The reports includes detailed summaries of the Receiver's activities,  
16 funds recovered, real and personal property assets, property taxes, insurance, loans  
17 and other investments, investigation of third party claims, pending litigation, and  
18 other matters. The reports also detail the receipts and disbursements for the  
19 receivership estate since the Receiver's appointment and provides her  
20 recommendations for the continued administration of the receivership. The  
21 reasonable and necessary fees for Allen Matkins' work in this category total  
22 \$3,705.30.

23 3. Operations & Asset Sales.

24 Allen Matkins' work in this category focused on advising the Receiver with  
25 respect to the disposition of the receivership estate's interest in the Casa del Zorro  
26 hotel. The reasonable and necessary fees for Allen Matkins' work in this category  
27 total \$402.75.

28

1                   4.     Claims & Distributions.

2                   Services rendered in this category focus on disputed claims against the  
3 receivership estate and distribution of receivership estate assets. Most of the work  
4 during the Application Period focused on the appeal of the Court’s February 24,  
5 2023 Order approving the Receiver’s recommendations regarding claim amounts,  
6 resolving claim disputes, and approving the Receiver’s proposed Distribution Plan  
7 (“Claims and Distribution Order”) filed by Kim Peterson, Kim Funding, LLC and  
8 ABC Funding Strategies, LLC (“Peterson Parties”). Oral argument in the appeal  
9 was held on August 13, 2024.

10                  After oral argument was held, the Ninth Circuit issued an order requiring  
11 further briefing on the issue of appellate jurisdiction. Allen Matkins researched the  
12 salient legal issues and prepared a further brief on behalf of the Receiver, which was  
13 filed on September 10, 2024. On April 28, 2025, the Ninth Circuit issued its  
14 Memorandum Decision affirming the Court’s February 24, 2023 Order, including  
15 the denial of the Peterson Parties’ claims against the receivership estate.

16                  The firm also assisted the Receiver with issues related to disseminating  
17 information about the receivership to investors and creditors, including information  
18 provided on the receivership website ([www.anireceivership.com](http://www.anireceivership.com)). The reasonable  
19 and necessary fees for Allen Matkins’ work in this category total \$32,293.80.

20                   5.     Third Party Recoveries.

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

1 Allen Matkins communicated with the Churillas, advised the Receiver on the  
2 legal issues and strategy, and prepared several reports to the Court regarding the  
3 status of the Churillas efforts to sell or refinance their property and pay the full  
4 \$265,000 settlement amount. The reasonable and necessary fees for Allen Matkins’  
5 work in this category total \$19,170.90.

6 6. Employment/Professional Fees

7 Although fee applications are a necessary component of federal equity  
8 receiverships, neither the Receiver nor her professionals charge for time spent  
9 preparing their own detailed applications. Allen Matkins assisted in preparing the  
10 Receiver’s Thirteenth Interim Fee Application (covering six months of work) and  
11 with meet and confer communications with counsel for the Commission. The fee  
12 applications were filed on October 11, 2024. The reasonable and necessary fees for  
13 Allen Matkins’ work in this category total \$1,530.45

14 7. General Clawback Claims & Settlements.

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

25 Allen Matkins’ work in this category during the Application Period focused  
26 on one matter against Charles D’Agostino, a former member of investor La Jolla  
27  
28

1 Bridge, LLC.<sup>2</sup> The firm prepared for and attended the hearing on the cross-motions  
2 for summary judgment held on November 7, 2024. After summary judgment was  
3 granted in favor of the Receiver, Allen Matkins communicated with counsel for  
4 D’Agostino regarding a potential settlement and discounted payoff of the judgment  
5 amount. The reasonable and necessary fees for Allen Matkins’ work in this  
6 category total \$9,895.50. To date, the Receiver has recovered more than \$9.4  
7 million for the receivership estate through the pursuit of clawback claims, which  
8 amount represents approximately 22% of the total distributions of \$43 million made  
9 by the Receiver to date. With the exception of the Kim Peterson matter discussed  
10 below, all clawback cases have now been resolved.

11 8. Claims Against Kim Peterson.

12 This portion of the Application pertains to work on claims against Kim  
13 Peterson and his entities to recover amounts for the benefit of the receivership  
14 estate. Due to the confidential nature of the ongoing legal work on this matter and  
15 the Receiver’s litigation strategy vis-à-vis third parties, the Receiver has filed a  
16 motion concurrently herewith to file this portion of the Application under seal. The  
17 reasonable and necessary fees for Allen Matkins’ work in this category total  
18 \$44,243.55. Kim Peterson and his entities, collectively, are the largest net winner in  
19 the Ponzi scheme, having received and retained approximately \$13 million in net  
20 profits from the scheme and its investors.

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

22 Allen Matkins requests that the Court approve reimbursement of \$13,709.09  
23 in out-of-pocket costs. The itemization of such expenses is summarized below by  
24 billing category.

25

26

27 <sup>2</sup> 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.

Category	Total
Messenger/FedEx Fees	\$38.46
Court/Filing Fees	\$108.53
Court Reporter	\$469.20
Duplication	\$36.90
E-Discovery	\$5,256.00
Evidence Storage	\$7,800.00
Total	\$13,709.09

**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 the “economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d 232, 237 (3d Cir.

1 1970). Regardless of how this balancing test is formulated, no single factor is  
2 determinative and “a reasonable fee is based [upon] all circumstances surrounding  
3 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.  
4 Supp. 465, 480 (S.D. Tex. 1974).

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

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

19 Allen Matkins has submitted a detailed fee application which describes the  
20 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to  
21 staff matters as efficiently as possible while remaining cognizant of the complexity  
22 of issues presented. As noted above, the request for fees is based on Allen Matkins’  
23 customary billing rates charged for comparable services provided in other matters,  
24 less a 10% discount.

25 The work performed by Allen Matkins was essential to carrying out the  
26 Receiver’s Court-ordered duties. The Receiver and Allen Matkins have worked  
27 diligently since the Receiver’s appointment to preserve and protect the assets of the  
28 receivership estate, maximize the funds available for ultimate distribution to

1 victims, and carry out the Receiver’s other duties pursuant to the Appointment  
2 Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an  
3 interim basis in recognition of the fact that its work in assisting the Receiver is  
4 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion  
5 of the receivership. Allen Matkins’ fees are fair and reasonable and should be  
6 approved and paid on an interim basis.

7 **III. CONCLUSION.**

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

- 9 1. Approving Allen Matkins’ fees of \$113,739.30;
- 10 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
11 \$90,991.44, from the assets of the Receivership Entities;
- 12 3. Approving Allen Matkins’ costs in the amount of \$13,709.09, and  
13 authorizing and directing the Receiver to reimburse such costs in full; and
- 14 4. For such other and further relief as the Court deems appropriate.

15  
16 Dated: May 8, 2025

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

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT INDEX**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>PAGE NO.</b>
Exhibit A	Detailed Descriptions of Services Rendered	12

# **EXHIBIT A**

# **EXHIBIT A**

01/24/25 11:24:34 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: 12/23/24

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

Proforma Number: 1313703

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		
08/01/24	9718835	Discuss issues with Receiver relating to SEC request for accounting information relating to Champion-Cain disgorgement	Fates, Edward (Ted)	0.60	483.30	483.30	WO	HD	TR	_____
08/06/24	9722909	Assist Receiver in addressing inquiry from media relating to Champion-Cain restitution order	Fates, Edward (Ted)	0.40	322.20	805.50	WO	HD	TR	_____
08/29/24	9749970	Discuss issues relating to remaining websites owned by receivership entities with Receiver	Fates, Edward (Ted)	0.20	161.10	966.60	WO	HD	TR	_____
09/09/24	9762968	Analyze request from US Attorney's Office regarding Champion-Cain restitution (.2) discuss same with Receiver (.2) respond to same (.1)	Fates, Edward (Ted)	0.50	402.75	1,369.35	WO	HD	TR	_____
11/05/24	9835108	Advise Receiver on Corporate Transparency act filing issues for receivership entities	Fates, Edward (Ted)	0.30	241.65	1,611.00	WO	HD	TR	_____
12/18/24	9889558	Analyze article regarding class action settlement involving Champion-Cain and discuss issues relating to criminal restitution	Fates, Edward (Ted)	0.70	563.85	2,174.85	WO	HD	TR	_____

01/24/25 11:24:34 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
		order with Receiver (.4) respond to inquiry from counsel for Investor re: same (.3)						
12/20/24	9889594	Communications with AUSA regarding class action settlement and issues relating to Champion-Cain restitution order	Fates, Edward (Ted)	0.40	322.20	2,497.05	WO	HD TR

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action
07/01/24	2890645	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for June 2024	0.00	876.00	WO	HD TR
07/01/24	2909381	ADV – Array - Evidence Storage Fee	0.00	4,800.00	WO	HD TR
07/31/24	2895186	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for July 2024	0.00	876.00	WO	HD TR
08/07/24	2898484	COURT – Other Court Charges - Heather Riley - SD SUPERIOR CRT ROA - Copy of minute order	0.00	5.00	WO	HD TR
08/31/24	2898961	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for August 2024	0.00	876.00	WO	HD TR
09/12/24	2897665	COLOR – Duplication - Color Copies	349.00	34.90	WO	HD TR
09/12/24	2899045	MSNGR – Federal Express - Ship To: U S Court of Appeals, 9th Cir - Attn Clerk of the Court	0.00	38.46	WO	HD TR
09/13/24	2897706	BW – Duplication - Black & White Copies	12.00	1.20	WO	HD TR
09/13/24	2897707	COLOR – Duplication - Color Copies	8.00	0.80	WO	HD TR
09/30/24	2905161	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for September 2024	0.00	876.00	WO	HD TR
10/31/24	2908649	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for October 2024	0.00	876.00	WO	HD TR

01/24/25 11:24:34 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				
10/31/24	2909379	ADV – Array - Evidence Storage Fee for September and October 2024	0.00	3,000.00	WO	HD	TR	_____
11/12/24	2909010	DEPO – Cameron P. Kircher - MSJ Hearing Held 11/7/24	0.00	469.20	WO	HD	TR	_____
11/30/24	2913554	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for November 2024	0.00	876.00	WO	HD	TR	_____
12/11/24	2912501	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Stipulation - Fee Due	0.00	41.51	WO	HD	TR	_____
12/11/24	2912502	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Stipulation - Fee Due	0.00	40.71	WO	HD	TR	_____
12/27/24	2914370	FILING – One Legal - Filing Fee for Superior Court of California, San Diego County, Supplemental Brief, Declaration, Proof of Service	0.00	21.31	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.10	805.50	2,497.05
		3.10		\$2,497.05
Subtotal Fees				\$2,497.05
Discount				0.00
Total Fees				2,497.05
Total Disbursements				13,709.09

**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 01/24/25**

Fiscal YTD                      Calendar YTD                      LTD

01/24/25 11:24:34 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,628.65	2,497.05	131.60	0.00	0.00	0.00	589,786.99	95,379.75	494,407.24
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	11,245.39	0.45	11,244.94
Billed	19,092.23	4,158.00	14,934.23	0.00	0.00	0.00	92,882.25	92,882.25	480,698.15
Collected	19,092.23	4,158.00	14,934.23	0.00	0.00	0.00	556,605.40	92,882.25	463,723.15
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	16,975.00	0.00	16,975.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>-1,624.08</b>	<b>2,497.05</b>	<b>-4,121.13</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

---

**Billing Address**

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

---

01/24/25 11:24:34 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      Matter #: 378827.00004      Client Name: Krista Freitag, as Receiver for ANI Deve  
(Ted)  
Date of Last Billing: 12/23/24      Matter Name: SEC v. Champion-Cain - Reporting  
Proforma Number: 1313703  
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		
07/26/24	9708496	Discuss updates for Receiver interim report with G. Rodriguez	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	_____
08/05/24	9720595	Work on Receiver's 20th interim report (1.4) discuss same with Receiver (.3) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.90	1,530.45	1,691.55	WO	HD	TR	_____
08/09/24	9725984	Meet and confer communications with SEC counsel re: 20th interim report	Fates, Edward (Ted)	0.20	161.10	1,852.65	WO	HD	TR	_____
08/16/24	9734355	Meet and confer with SEC counsel re: 20th interim report	Fates, Edward (Ted)	0.20	161.10	2,013.75	WO	HD	TR	_____
08/22/24	9741936	Work on updates and revisions to Receiver's 20th interim report	Fates, Edward (Ted)	0.60	483.30	2,497.05	WO	HD	TR	_____
11/18/24	9850021	Work on Receiver's 21st interim report (1.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	1,047.15	3,544.20	WO	HD	TR	_____
11/19/24	9852110	Meet and confer communications with SEC counsel re: 21st interim report	Fates, Edward (Ted)	0.20	161.10	3,705.30	WO	HD	TR	_____

01/24/25 11:24:34 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.60	805.50	3,705.30
		4.60		\$3,705.30
Subtotal Fees				\$3,705.30
Discount				0.00
Total Fees				3,705.30
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

**Account Summary – As Of 01/24/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,705.30	3,705.30	0.00	0.00	0.00	0.00	92,480.85	92,480.85	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	3,341.25	3,341.25	0.00	0.00	0.00	0.00	88,775.55	88,775.55	0.00
Collected	3,341.25	3,341.25	0.00	0.00	0.00	0.00	88,775.55	88,775.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>3,705.30</b>	<b>3,705.30</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

01/24/25 11:24:34 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

---

**Billing Address**

---

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

---

01/24/25 11:24:35 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: 12/23/24      Matter Name: SEC v. Champion-Cain - Operations & Asse  
 Proforma Number: 1313703  
 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		
11/08/24	9838841	Analyze issues relating to membership interest in Casa del Zoro hotel	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	_____
11/13/24	9844685	Discuss potential sale of Casa del Zorro interest with Receiver	Fates, Edward (Ted)	0.30	241.65	402.75	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.50	805.50	402.75
		0.50		\$402.75
Subtotal Fees				\$402.75
Discount				0.00
Total Fees				402.75
Total Disbursements				0.00

**Attorney Billing Instructions**

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

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

**Billing Instructions**

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

**Account Summary – As Of 01/24/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,416.50	2,416.50	0.00	2,013.75	2,013.75	0.00	746,311.95	746,311.95	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	816.75	816.75	0.00	0.00	0.00	0.00	743,895.45	743,895.45	0.00
Collected	816.75	816.75	0.00	0.00	0.00	0.00	743,895.45	743,895.45	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>2,416.50</b>	<b>2,416.50</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

01/24/25 11:24:35 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: 12/23/24

Matter Name: SEC v. Champion-Cain - Claims & Distribu

Proforma Number: 1313703

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		
07/16/24	9696551	Advise on filing of notice of acknowledgment of hearing	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	_____
07/17/24	9696563	Analyze and revise joint motion in appeals relating to request for additional argument time (.3) communications with counsel for Appellees re: same (.3)	Fates, Edward (Ted)	0.60	483.30	644.40	WO	HD	TR	_____
07/18/24	9696574	Analyze further revisions to joint motion relating to argument time for appeals and communications with counsel for appellees re: same	Fates, Edward (Ted)	0.40	322.20	966.60	WO	HD	TR	_____
07/23/24	9704693	Respond to inquiry from counsel for investors re: pending litigation and future distributions	Fates, Edward (Ted)	0.20	161.10	1,127.70	WO	HD	TR	_____
07/26/24	9708075	Respond to inquiry from investor regarding timing of further distributions (.2) analyze arguments and strategy for oral argument in Peterson appeal of order denying claims (.5)	Fates, Edward (Ted)	0.70	563.85	1,691.55	WO	HD	TR	_____

01/24/25 11:24:35 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)**

---

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
08/05/24	9720884	Analyze issues and prepare arguments for 8/13 oral argument on Peterson appeal or order denying claims in receivership	Fates, Edward (Ted)	1.60	1,288.80	2,980.35	WO	HD	TR	_____
08/06/24	9722709	Analyze and development arguments for 8/13 oral argument at Ninth Circuit	Fates, Edward (Ted)	1.60	1,288.80	4,269.15	WO	HD	TR	_____
08/07/24	9723609	Analyze key cases related to Peterson appeal of order denying claims and prepare for oral argument on 8/13	Fates, Edward (Ted)	2.10	1,691.55	5,960.70	WO	HD	TR	_____
08/09/24	9728150	Prepare arguments and strategy for 8/13 oral argument in Peterson appeal of order denying claims against receivership	Fates, Edward (Ted)	1.30	1,047.15	7,007.85	WO	HD	TR	_____
08/13/24	9731308	Analyze briefs and arguments in preparation for oral argument (1.2) attend in-person oral argument (2.6) confer with counsel for Chicago Title and counsel for Nossaman re: same (.4) discuss same with Receiver (.5)	Fates, Edward (Ted)	4.70	3,785.85	10,793.70	WO	HD	TR	_____
08/20/24	9738479	Analyze order from Ninth Circuit re: jurisdictional issue and further briefing re: same (.4) discuss same with Receiver (.2) initial work on research and supplemental brief (.7)	Fates, Edward (Ted)	1.30	1,047.15	11,840.85	WO	HD	TR	_____
08/21/24	9740012	Analyze case law on appealable collateral orders in receiverships and FRCP 54(b) certification of orders for appeal	Fates, Edward (Ted)	0.90	724.95	12,565.80	WO	HD	TR	_____
08/22/24	9741021	Analyze issues and advise on Rule 54(b) research and analysis needed for supplemental brief	Fates, Edward (Ted)	0.80	644.40	13,210.20	WO	HD	TR	_____

01/24/25 11:24:35 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)**

---

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
08/22/24	9741023	Conference with T. Fates regarding 9th circuit appeal research (.5);	Kebeh, Alphamorlai "Mo"	0.50	274.50	13,484.70	WO	HD	TR	_____
08/27/24	9747442	Tel. Conf. with T. Fates regarding progress regarding 9th circuit appellate research issues (.3); conduct research regarding 9th circuit supplemental briefing issues, analyze court order regarding same (2.1).	Kebeh, Alphamorlai "Mo"	2.40	1,317.60	14,802.30	WO	HD	TR	_____
08/28/24	9753595	Research regarding 9th circuit supplemental briefing issues (.6).	Kebeh, Alphamorlai "Mo"	0.60	329.40	15,131.70	WO	HD	TR	_____
08/30/24	9751113	Analyze Rule 54(b) issues for supplemental brief in Peterson appeal or order denying claims in receivership	Fates, Edward (Ted)	0.50	402.75	15,534.45	WO	HD	TR	_____
08/30/24	9753622	Finalize research regarding 9th circuit supplemental briefing issues, prepare memo to T. Fates regarding same (2.5).	Kebeh, Alphamorlai "Mo"	2.50	1,372.50	16,906.95	WO	HD	TR	_____
09/03/24	9754373	Correspondence with T. Fates regarding results of 9th cir. research regarding supplemental briefing issues (.1); tel. conf. with T. Fates regarding same (.3);	Kebeh, Alphamorlai "Mo"	0.40	219.60	17,126.55	WO	HD	TR	_____
09/03/24	9755604	Work on brief regarding appellate jurisdiction and Rule 54(b) issue (.9) advise on research issues and arguments for same (.5)	Fates, Edward (Ted)	1.40	1,127.70	18,254.25	WO	HD	TR	_____
09/03/24	9769058	Conduct additional research regarding 54(b) certification issues.	Kebeh, Alphamorlai "Mo"	1.90	1,043.10	19,297.35	WO	HD	TR	_____
09/04/24	9764279	Work on appeal brief regarding jurisdiction and related issues for Peterson appeal of order denying claims in receivership	Fates, Edward (Ted)	1.30	1,047.15	20,344.50	WO	HD	TR	_____

01/24/25 11:24:35 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		
09/05/24	9758762	Tel. conf. with T. Fates regarding 9th circuit 54(b) certification issues and research (.6);	Kebeh, Alphamorlai "Mo"	0.60	329.40	20,673.90	WO	HD	TR	_____
09/05/24	9758763	Analyze and advise on legal issues for potential remand to consider Rule 54(b) certification (1.1) work on brief re: same and appellate jurisdiction (.6) call with counsel for Peterson re: issues for supplemental briefs due 9/10 (.6)	Fates, Edward (Ted)	2.30	1,852.65	22,526.55	WO	HD	TR	_____
09/05/24	9769060	Conduct research regarding additional 54(b) motion appellate issues (2.1); memo to T. Fates regarding same (1.6).	Kebeh, Alphamorlai "Mo"	3.70	2,031.30	24,557.85	WO	HD	TR	_____
09/06/24	9759638	Discuss issues and strategy relating to limited remand and Rule 54(b) certification with Receiver (.8) communications with SEC counsel re: same (.4)	Fates, Edward (Ted)	1.20	966.60	25,524.45	WO	HD	TR	_____
09/06/24	9769067	Synthesize research regarding 54(b) certification research, correspondence with T. Fates regarding same (.8); supplemental research in connection with same (1.7).	Kebeh, Alphamorlai "Mo"	2.50	1,372.50	26,896.95	WO	HD	TR	_____
09/09/24	9761846	Work on brief on appellate jurisdiction and Rule 54(b) issues for Peterson appeal of claims order (1.1) discuss same with Receiver (.6)	Fates, Edward (Ted)	1.70	1,369.35	28,266.30	WO	HD	TR	_____
09/10/24	9765823	Revisions to brief regarding appellate jurisdiction and Rule 54(b) (.6) discuss same with Receiver (.4) finalize same (.3) analyze Peterson brief re: same (.5)	Fates, Edward (Ted)	1.80	1,449.90	29,716.20	WO	HD	TR	_____

01/24/25 11:24:35 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)**


---

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
09/24/24	9780220	Call from investor regarding status and timing of further distributions	Fates, Edward (Ted)	0.30	241.65	29,957.85	WO	HD	TR	_____
10/02/24	9792056	Call from investor regarding status of litigation matters and timing of further distributions	Fates, Edward (Ted)	0.30	241.65	30,199.50	WO	HD	TR	_____
12/10/24	9877220	Analyze order from Ninth Circuit on procedural defect with Peterson appeal of order denying claims in receivership, limited remand to cure same (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	483.30	30,682.80	WO	HD	TR	_____
12/12/24	9879571	Communications with counsel for Peterson regarding Rule 54(b) certification motion (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	483.30	31,166.10	WO	HD	TR	_____
12/18/24	9887573	Call from counsel for investors regarding status and timing of distributions	Fates, Edward (Ted)	0.30	241.65	31,407.75	WO	HD	TR	_____
12/20/24	9891518	Analyze Peterson draft motion for Rule 54(b) certification of order denying Peterson claims in receivership for appeal (.4) communications with counsel for Peterson re: same (.3)	Fates, Edward (Ted)	0.70	563.85	31,971.60	WO	HD	TR	_____
12/26/24	9894912	Communications with counsel for Peterson regarding potential joint motion to address Rule 54(b) certification issue for appeal of order denying claims	Fates, Edward (Ted)	0.40	322.20	32,293.80	WO	HD	TR	_____

---

**Proforma Summary**


---

<b>Timekeeper Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001665	Fates, Edward (Ted)	29.80	805.50	24,003.90

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
002661	Kebeh, Alphamorlai "Mo"	15.10	549.00	8,289.90
		44.90		\$32,293.80
Subtotal Fees				\$32,293.80
Discount				0.00
Total Fees				32,293.80
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 01/24/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	35,354.70	35,354.70	0.00	3,060.90	3,060.90	0.00	817,049.70	817,049.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.99	0.99	0.00
Billed	3,935.25	3,935.25	0.00	0.00	0.00	0.00	781,695.99	781,695.99	0.00
Collected	3,935.25	3,935.25	0.00	0.00	0.00	0.00	781,695.99	781,695.99	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP Balance</b>	<b>38,676.90</b>	<b>35,354.70</b>	<b>3,322.20</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

---

**Billing Address**

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

---

01/24/25 11:24:35 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: 12/23/24

Matter Name: SEC v. Champion-Cain - Third Party Recov

Proforma Number: 1313703

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		
07/02/24	9682880	Communications with title company handling Churilla refinance transaction regarding lien issues holding up closing (.8) attend settlement disposition conference calls in Churilla matter with clerk for Judge Goddard (.7) follow up communications re: same (.3)	Fates, Edward (Ted)	1.80	1,449.90	1,449.90	WO	HD	TR	_____
07/08/24	9687271	Communications with title insurer for Churilla refinance transaction	Fates, Edward (Ted)	0.20	161.10	1,611.00	WO	HD	TR	_____
07/15/24	9693960	Communications with title company for Churilla refinance transaction	Fates, Edward (Ted)	0.20	161.10	1,772.10	WO	HD	TR	_____
07/22/24	9701878	Communications with title company regarding work to clear liens for Churilla refinance	Fates, Edward (Ted)	0.30	241.65	2,013.75	WO	HD	TR	_____
07/24/24	9705658	Communications with E. Churilla regarding settlement disposition conference (.3) attend settlement disposition conference (.3)	Fates, Edward (Ted)	0.60	483.30	2,497.05	WO	HD	TR	_____

01/24/25 11:24:35 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)**


---

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
07/25/24	9706673	Communications with law clerk for Judge Goddard regarding joint motion for stay of case pending resolution of lien issues and settlement payment (.4) work on joint motion to stay Churilla / Illa Designs case (.6) communications with E. Churilla re: same (.3)	Fates, Edward (Ted)	1.30	1,047.15	3,544.20	WO	HD	TR	_____
07/31/24	9714086	Communications with title company for Churilla refinance transaction about status of work on remaining lien issues	Fates, Edward (Ted)	0.20	161.10	3,705.30	WO	HD	TR	_____
08/05/24	9720609	Follow up communications with title company re: status of work on Churilla liens	Fates, Edward (Ted)	0.20	161.10	3,866.40	WO	HD	TR	_____
08/06/24	9722840	Follow up communications with title company regarding status of work to clear liens from title to Churilla property	Fates, Edward (Ted)	0.40	322.20	4,188.60	WO	HD	TR	_____
08/07/24	9723972	Communications with title company re: clearing of liens for Churilla refinance (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.30	241.65	4,430.25	WO	HD	TR	_____
08/12/24	9728299	Communications with title company and E. Churilla re: status of efforts to close refinance, communications with mortgage broker for Churilla loan re: same	Fates, Edward (Ted)	0.90	724.95	5,155.20	WO	HD	TR	_____
08/16/24	9734273	Communications with mortgage broker for E. Churilla regarding refinance loan (.1) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.40	322.20	5,477.40	WO	HD	TR	_____
08/20/24	9738120	Communications with mortgage broker regarding status of Churilla loan (.2) work on required status report (.3)	Fates, Edward (Ted)	0.50	402.75	5,880.15	WO	HD	TR	_____

01/24/25 11:24:35 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)**


---

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
08/21/24	9739828	Work on status report regarding settlement and Churilla refinance transaction (.9) communications re: same with E. Churilla (.3)	Fates, Edward (Ted)	1.20	966.60	6,846.75	WO	HD	TR	_____
08/23/24	9742027	Communications with mortgage broker for E. Churilla regarding loan approval process	Fates, Edward (Ted)	0.30	241.65	7,088.40	WO	HD	TR	_____
08/26/24	9745956	Discuss revisions to status report with Receiver (.2) work on revisions and finalize status report (.3)	Fates, Edward (Ted)	0.50	402.75	7,491.15	WO	HD	TR	_____
08/29/24	9749696	Communications with mortgage broker for Churilla and Churilla regarding loan approval steps	Fates, Edward (Ted)	0.30	241.65	7,732.80	WO	HD	TR	_____
09/03/24	9757746	Follow up communications with E. Churilla and mortgage broker regarding loan approval issues for refinance	Fates, Edward (Ted)	0.40	322.20	8,055.00	WO	HD	TR	_____
09/10/24	9769282	Communications with E. Churilla re: loan application and employment issues (.3) advise Receiver re: same (.3)	Fates, Edward (Ted)	0.60	483.30	8,538.30	WO	HD	TR	_____
09/16/24	9769289	Communications with E. Churilla re: refinance loan application, settlement payment and related issues	Fates, Edward (Ted)	0.70	563.85	9,102.15	WO	HD	TR	_____
09/17/24	9772425	Analyze property related information provided by E. Churilla (.3) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	0.60	483.30	9,585.45	WO	HD	TR	_____
09/19/24	9774537	Calls with E. Churilla and N. Churilla regarding potential listing and marketing of Texas property and related foreclosure and bankruptcy issues (.8) call with Receiver re:	Fates, Edward (Ted)	2.10	1,691.55	11,277.00	WO	HD	TR	_____

01/24/25 11:24:35 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		
		same and next steps (.5) work on status report regarding same (.8)								
09/23/24	9777847	Revisions to status report for Churilla matter (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	402.75	11,679.75	WO	HD	TR	_____
09/24/24	9780229	Communications with E. Churilla regarding loan application status	Fates, Edward (Ted)	0.20	161.10	11,840.85	WO	HD	TR	_____
09/27/24	9783913	Communications with E. Churilla re: employment status (.1) update Receiver re: same (.1)	Fates, Edward (Ted)	0.20	161.10	12,001.95	WO	HD	TR	_____
10/04/24	9794298	Communications with E. Churilla regarding employment and loan application status	Fates, Edward (Ted)	0.20	161.10	12,163.05	WO	HD	TR	_____
11/05/24	9834953	Communications with E. Churilla regarding employment and loan application issues	Fates, Edward (Ted)	0.20	161.10	12,324.15	WO	HD	TR	_____
11/07/24	9837657	Discuss issues and approach to prospective recovery from Churilla with Receiver	Fates, Edward (Ted)	0.30	241.65	12,565.80	WO	HD	TR	_____
11/08/24	9838461	Work on status report regarding Churilla settlement (.5) discuss same with Receiver (.3) communications with E. Churilla (.1)	Fates, Edward (Ted)	0.90	724.95	13,290.75	WO	HD	TR	_____
11/12/24	9843603	Call with Receiver and Churillas regarding breach of settlement agreement, attempts to refinance property in Texas and potential for marketing property for sale (.6) discuss same with Receiver (.4) prepare proposed modified settlement terms (.5)	Fates, Edward (Ted)	1.50	1,208.25	14,499.00	WO	HD	TR	_____
11/19/24	9852285	Analyze and discuss strategy for Churilla issues with Receiver and G. Rodriguez (.4)	Fates, Edward (Ted)	1.10	886.05	15,385.05	WO	HD	TR	_____

01/24/25 11:24:35 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		
		prepare correspondence to E. Churilla regarding proposed plan for listing house for sale and related terms (.7)								
11/27/24	9863200	Analyze response from E. Churilla regarding proposed plan to resolve breach of settlement agreement (.5) prepare draft response to same (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.10	886.05	16,271.10	WO	HD	TR	_____
12/16/24	9883293	Follow up communications with Eric Churilla regarding proposed terms for moving forward and avoiding foreclosure (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	402.75	16,673.85	WO	HD	TR	_____
12/17/24	9885852	Discuss options and strategy regarding Churilla with Receiver (.3) communications with Churilla re: same (.4)	Fates, Edward (Ted)	0.70	563.85	17,237.70	WO	HD	TR	_____
12/18/24	9887100	Communications with Churillas and Receiver regarding terms of amendment to settlement agreement (.6) work on amendment to settlement agreement (.9)	Fates, Edward (Ted)	1.50	1,208.25	18,445.95	WO	HD	TR	_____
12/23/24	9892531	Work on status report regarding settlement in Churilla matter (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	724.95	19,170.90	WO	HD	TR	_____

---

**Proforma Summary**


---

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	23.80	805.50	19,170.90
		23.80		\$19,170.90
Subtotal Fees				\$19,170.90
Discount				0.00

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Total Fees				19,170.90
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

**Account Summary – As Of 01/24/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	19,332.00	19,332.00	0.00	161.10	161.10	0.00	1,060,527.60	1,060,527.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	78.49	68.49	10.00
Billed	7,647.75	7,647.75	0.00	0.00	0.00	0.00	1,041,130.35	1,041,130.35	0.00
Collected	7,647.75	7,647.75	0.00	0.00	0.00	0.00	1,041,130.35	1,041,130.35	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>19,332.00</b>	<b>19,332.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

San Diego, CA 92101

---

01/24/25 11:24:35 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: 12/23/24

Matter Name: SEC v. Champion-Cain - Employment/Fees

Proforma Number: 1313703

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		
09/16/24	9770201	Revisions to Receiver's 13th interim fee application (.6) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.90	724.95	724.95	WO	HD	TR	_____
09/23/24	9778140	Revisions to Receiver's 13th fee application (.3) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	0.50	402.75	1,127.70	WO	HD	TR	_____
10/11/24	9801793	Meet and confer communications with SEC counsel (.1) finalize Receiver's 13th fee application, notice of hearing and proposed order (.3) communications with Receiver re: same (.1)	Fates, Edward (Ted)	0.50	402.75	1,530.45	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.90	805.50	1,530.45
		1.90		\$1,530.45
	Subtotal Fees			\$1,530.45
	Discount			0.00
	Total Fees			1,530.45

01/24/25 11:24:35 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 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

**Account Summary – As Of 01/24/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,530.45	1,530.45	0.00	0.00	0.00	0.00	19,973.70	19,973.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,559.25	1,559.25	0.00	0.00	0.00	0.00	18,443.25	18,443.25	0.00
Collected	1,559.25	1,559.25	0.00	0.00	0.00	0.00	18,443.25	18,443.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>1,530.45</b>	<b>1,530.45</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

01/24/25 11:24:35 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: 12/23/24

Matter Name: General Clawback Claims & Settlements

Proforma Number: 1313703

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		
07/22/24	9711261	Confer with Ted Fates regarding outstanding receivership and clawback action issues	Pham, Matt D.	0.20	123.30	123.30	WO	HD	TR	_____
07/26/24	9708073	Communications with counsel for D. Levene and local counsel in NY regarding release of lien securing default judgment pursuant to completed settlement	Fates, Edward (Ted)	0.30	241.65	364.95	WO	HD	TR	_____
07/31/24	9714007	Communications with local counsel in NY regarding recording of lien release for D. Levene property	Fates, Edward (Ted)	0.20	161.10	526.05	WO	HD	TR	_____
08/06/24	9722821	Advise Receiver regarding order setting oral argument on cross motions for summary judgment in D'Agostino matter	Fates, Edward (Ted)	0.20	161.10	687.15	WO	HD	TR	_____
08/14/24	9731924	Call / emails with counsel for D'Agostino regarding request for continuance of hearing on cross-motions for summary judgment due to health reasons (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	483.30	1,170.45	WO	HD	TR	_____

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims &amp; Settlements)

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

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
08/15/24	9733097	Analyze proposed joint motion to continue hearing on cross MSJs from counsel for D'Agostino and discuss same with Receiver (.5) communications with local counsel in NY and counsel for D. Levene regarding recorded lien release pursuant to settlement (.4)	Fates, Edward (Ted)	0.90	724.95	1,895.40	WO	HD	TR	_____
08/16/24	9734179	Communications with Receiver and counsel for D'Agostino regarding joint motion to continue hearing on cross motions for summary judgment	Fates, Edward (Ted)	0.40	322.20	2,217.60	WO	HD	TR	_____
08/19/24	9736710	Advise Receiver re: continuance of hearing on cross motions for summary judgment in D'Agostino	Fates, Edward (Ted)	0.10	80.55	2,298.15	WO	HD	TR	_____
10/11/24	9802296	Initial preparation for 11/7 hearing on cross-motions for summary judgment in La Jolla Bridge / D'Agostino matter	Fates, Edward (Ted)	0.70	563.85	2,862.00	WO	HD	TR	_____
11/04/24	9850576	Confer with Ted Fates regarding upcoming hearings on summary judgment motions and motion for leave to file cross-complaint	Pham, Matt D.	0.20	123.30	2,985.30	WO	HD	TR	_____
11/05/24	9835004	Analyze pleadings and arguments in preparation for hearing on cross motions for summary judgment in La Jolla Bridge / D'Agostino matter	Fates, Edward (Ted)	1.30	1,047.15	4,032.45	WO	HD	TR	_____
11/05/24	9850581	Review summary judgment papers filed in La Jolla Bridge and Peterson clawback actions ahead of hearings	Pham, Matt D.	1.40	863.10	4,895.55	WO	HD	TR	_____
11/06/24	9836753	Discuss preparation for hearing on motion for summary judgment in D'Agostino with	Fates, Edward (Ted)	0.20	161.10	5,056.65	WO	HD	TR	_____

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims &amp; Settlements)

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

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		Receiver								
11/06/24	9850586	Continue reviewing summary judgment papers filed in La Jolla Bridge and Peterson clawback actions	Pham, Matt D.	0.70	431.55	5,488.20	WO	HD	TR	_____
11/07/24	9837667	Prepare for hearing on cross motions for summary judgment in D'Agostino (1.1) call with Receiver re: same (.3) attend hearing (.9)	Fates, Edward (Ted)	2.30	1,852.65	7,340.85	WO	HD	TR	_____
11/07/24	9850589	Virtually meet with Ted Fates and Krista Freitag regarding preparation for hearing on summary judgment motions (0.9); Calculate updated prejudgment interest on claims against D'Agostino and against Peterson (0.3)	Pham, Matt D.	1.20	739.80	8,080.65	WO	HD	TR	_____
11/08/24	9838620	Call from counsel for Valeiras regarding hearing on summary judgment in La Jolla Bridge / D'Agostino matter	Fates, Edward (Ted)	0.30	241.65	8,322.30	WO	HD	TR	_____
11/08/24	9850592	Confer with Ted Fates regarding recap of hearing and next steps	Pham, Matt D.	0.20	123.30	8,445.60	WO	HD	TR	_____
12/03/24	9868858	Analyze order granting Receiver's summary judgment motion and denying D'Agostino's summary judgment motion, clerk's judgment on same (.6) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.70	563.85	9,009.45	WO	HD	TR	_____
12/12/24	9879682	Communications with counsel for D'Agostino regarding judgment and next steps	Fates, Edward (Ted)	0.20	161.10	9,170.55	WO	HD	TR	_____
12/16/24	9883324	Communications with counsel for D'Agostino (.3) discuss same with Receiver	Fates, Edward (Ted)	0.40	322.20	9,492.75	WO	HD	TR	_____

01/24/25 11:24:35 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 (.1)	Timekeeper	Hours	Fees	Sum	Circle	Action
12/23/24	9892076	Communications with counsel for D'Agostino regarding potential discounted payoff of judgment	Fates, Edward (Ted)	0.30	241.65	9,734.40	WO	HD TR
12/26/24	9895145	Communications with counsel for D'Agostino regarding potential resolution of judgment (.1) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.20	161.10	9,895.50	WO	HD TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	9.30	805.50	7,491.15
002510	Pham, Matt D.	3.90	616.50	2,404.35
		<u>13.20</u>		<u>\$9,895.50</u>
Subtotal Fees				\$9,895.50
Discount				0.00
Total Fees				9,895.50
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

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

**Account Summary – As Of 01/24/25**

Fiscal YTD

Calendar YTD

LTD

01/24/25 11:24:35 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	15,534.00	15,534.00	0.00	5,638.50	5,638.50	0.00	1,432,693.80	1,432,693.80	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	15,669.45	15,669.45	0.00	0.00	0.00	0.00	1,417,159.80	1,417,159.80	0.00
Collected	15,669.45	15,669.45	0.00	0.00	0.00	0.00	1,417,159.80	1,417,159.80	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>15,534.00</b>	<b>15,534.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

---

**Billing Address**

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

---