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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.

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

**FIFTEENTH 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: October 16, 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 Fifteenth Interim Application for Payment of Fees and Reimbursement
6 of Expenses (the “Application”). This Application covers the six-month period
7 from January 1, 2025 through June 30, 2025 (the “Application Period”), and seeks
8 approval of \$127,755.90 in fees and \$7,476.15 in expenses, and an order authorizing
9 the Receiver to pay, on an interim basis, 80% of the fees incurred (\$102,204.72) and
10 100% of the expenses incurred (\$7,476.15).

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 Third and Twenty-Fourth Interim Reports and Recommendations, filed on June 4,

2025 and September 3, 2025 (Dkt. 1078, 1084), which describe in detail the Receiver's activities during the six-month Application Period.

This Application seeks approval of \$127,755.90 in fees for a total of 180.20 hours worked, and payment on an interim basis of 80% of that amount, or \$102,204.72. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**¹ and is broken down into the following categories:

Category	Hours	Amount
General Receivership	4.90	\$3,946.95
Reporting	5.00	\$4,027.50
Operations & Asset Sales	13.20	\$10,632.60
Claims & Distributions	5.50	\$4,430.25
Third Party Recoveries	7.90	\$6,363.45
Employment/Professional Fees	0.50	\$402.75
General Clawback Claims & Settlements	10.00	\$8,055.00
Claims Against Kim Peterson et al.	133.20	\$89,897.40
Total Fees	180.20	\$127,755.90

Allen Matkins' work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets, and in particular to advance the receivership estate's claims against Kim Peterson and his related entities and trusts to judgments. Because the firm has worked diligently and efficiently to assist the Receiver in carrying out her Court-ordered duties, it should be compensated on an interim basis for its work.

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

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. In particular, Allen Matkins assisted the Receiver in
8 communicating with counsel for GCC and the United States Attorney's Office
9 regarding a prisoner class action settlements in which GCC was a class member and
10 the settlement funds related thereto. The firm also advised the Receiver on the filing
11 requirements for the Receivership Entities under the Corporate Transparency Act.
12 The reasonable and necessary fees for Allen Matkins' work in this category total
13 \$3,946.95.

14 2. Reporting.

15 Allen Matkins' services in this category focus on assisting the Receiver in
16 preparing her Twenty-Second and Twenty-Third Interim Reports and
17 Recommendations, which were filed on May 7, 2025 and June 4, 2025, respectively.
18 Dkt. 1068, 1078. The reports includes detailed summaries of the Receiver's
19 activities, funds recovered, real and personal property assets, property taxes,
20 insurance, loans and other investments, investigation of third party claims, pending
21 litigation, and other matters. The reports also detail the receipts and disbursements
22 for the receivership estate since the Receiver's appointment and provides her
23 recommendations for the continued administration of the receivership. The
24 reasonable and necessary fees for Allen Matkins' work in this category total
25 \$4,027.50.

26 3. Operations & Asset Sales.

27 Allen Matkins' work in this category focused on advising the Receiver with
28 respect to the disposition of the receivership estate's interest in the Casa del Zorro

1 hotel, including drafting and revising a Membership Interest Purchase Agreement
2 and an amendment thereto to provide the buyer with additional time to obtain
3 financing necessary to close the transaction. The reasonable and necessary fees for
4 Allen Matkins' work in this category total \$10,632.60.

5 4. Claims & Distributions.

6 Services rendered in this category focus on disputed claims against the
7 receivership estate and distribution of receivership estate assets. Most of the work
8 during the Application Period focused on the appeal of the Court's February 24,
9 2023 Order approving the Receiver's recommendations regarding claim amounts,
10 resolving claim disputes, and approving the Receiver's proposed Distribution Plan
11 ("Claims and Distribution Order") filed by Kim Peterson, Kim Funding, LLC and
12 ABC Funding Strategies, LLC ("Peterson Parties").

13 After oral argument was held in August 2024, the Ninth Circuit issued an
14 order requiring further briefing on the issue of appellate jurisdiction. On December
15 10, 2024, the Ninth Circuit issued an order for a limited remand to allow the
16 Peterson Parties to seek certification of the Claims and Distribution Order for
17 appeal. Allen Matkins analyzed the Peterson Parties' subsequent motion for
18 certification of the Claims and Distribution Order (which the Receiver did not
19 oppose) and provided a status report to the Ninth Circuit regarding the same (as
20 instructed). On February 6, 2025, this Court granted to the motion for certification.
21 On April 28, 2025, the Ninth Circuit issued its Memorandum Decision affirming the
22 Court's February 24, 2023 Order, including the denial of the Peterson Parties'
23 claims against the receivership estate.

24 The firm also assisted the Receiver with issues related to disseminating
25 information about the receivership to investors and creditors, including information
26 provided on the receivership website (www.anireceivership.com). The reasonable
27 and necessary fees for Allen Matkins' work in this category total \$4,430.25.

28

1 5. Third Party Recoveries.

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

10 Allen Matkins communicated with the Churillas (as well as their broker in
11 Texas) about the process for listing and marketing their property in Austin, Texas,
12 and advised the Receiver on the legal issues and strategy. The reasonable and
13 necessary fees for Allen Matkins' work in this category total \$6,363.45.

14 6. Employment/Professional Fees

15 Although fee applications are a necessary component of federal equity
16 receiverships, neither the Receiver nor her professionals charge for time spent
17 preparing their own detailed applications. Allen Matkins assisted in preparing the
18 Receiver's Fourteenth Interim Fee Application (covering six months of work) and
19 with meet and confer communications with counsel for the Commission. The fee
20 applications were filed on May 8, 2025. The reasonable and necessary fees for
21 Allen Matkins' work in this category total \$402.75

22 7. General Clawback Claims & Settlements.

23 This portion of the Application pertains to work on clawback claims against
24 third parties and settlements to recover amounts for the benefit of the receivership
25 estate. Although the vast majority of clawback claims were resolved without any
26 action being filed, there are some where the net winners involved either refused to
27 settle, ignored correspondence from the Receiver's counsel and other attempts to
28 make contact, or disputed the Receiver's accounting without any documentary

1 support. In these instances, Allen Matkins assisted the Receiver in filing and
2 prosecuting clawback actions against the applicable net winners, including preparing
3 complaints, amended complaints (in certain instances), discovery requests, and other
4 pleadings.

5 Allen Matkins' work in this category during the Application Period focused
6 on one matter against Charles D'Agostino, a former member of investor La Jolla
7 Bridge, LLC.² After summary judgment was granted in favor of the Receiver, Allen
8 Matkins communicated with counsel for D'Agostino regarding a potential
9 settlement and discounted payoff of the judgment amount. A settlement agreement
10 was reached, documented, and executed, and full payment (\$300,000) was received
11 by the Receiver at the end of May 2025. The reasonable and necessary fees for
12 Allen Matkins' work in this category total \$8,055.00. To date, the Receiver has
13 recovered more than \$9.7 million for the receivership estate through the pursuit of
14 clawback claims, which amount represents approximately 22% of the total
15 distributions of \$43 million made by the Receiver to date. With the exception of the
16 Kim Peterson matter discussed below, all clawback cases have now been resolved.

17 8. Claims Against Kim Peterson.

18 This portion of the Application pertains to work on claims against Kim
19 Peterson and his entities to recover amounts for the benefit of the receivership
20 estate. Due to the confidential nature of the ongoing legal work on this matter and
21 the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a
22 motion concurrently herewith to file this portion of the Application under seal. The
23 reasonable and necessary fees for Allen Matkins' work in this category total
24 \$89,897.40. Kim Peterson and his entities, collectively, are the largest net winner in
25

26 ² The Receiver has previously requested that the narrative for this category of
27 Allen Matkins' fees be allowed to be filed under seal. However, for this
28 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 the Ponzi scheme, having received and retained approximately \$13 million in net
2 profits from the scheme and its investors.

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

4 Allen Matkins requests that the Court approve reimbursement of \$7,476.15 in
5 out-of-pocket costs. The itemization of such expenses is summarized below by
6 billing category.

Category	Total
Messenger/FedEx Fees	\$50.50
Court/Filing Fees	\$669.65
E-Discovery	\$5,256.00
Evidence Storage	\$1,500.00
Total	\$7,476.15

13 **II. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**
14 **ALLOWED.**

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

22 In allowing fees, a court should consider “the time, labor and skill required,
23 but not necessarily that actually expended, in the proper performance of the duties
24 imposed by the court upon the receiver . . . , the fair value of such time, labor and
25 skill measured by conservative business standards, the degree of activity, integrity
26 and dispatch with which the work is conducted and the result obtained.” *United*
27 *States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation
28 marks omitted). In practical terms, receiver and professional compensation thus

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

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

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

23 Allen Matkins has submitted a detailed fee application which describes the
24 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
25 staff matters as efficiently as possible while remaining cognizant of the complexity
26 of issues presented. As noted above, the request for fees is based on Allen Matkins’
27 customary billing rates charged for comparable services provided in other matters,
28

1 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for 2.50
2 hours of work (\$2,013.75 in fees).

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

13 **III. CONCLUSION.**

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

- 15 1. Approving Allen Matkins' fees of \$127,755.90;
16 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
17 \$102,204.72, from the assets of the Receivership Entities;
18 3. Approving Allen Matkins' costs in the amount of \$7,476.15, and
19 authorizing and directing the Receiver to reimburse such costs in full; and
20 4. For such other and further relief as the Court deems appropriate.
21

22 Dated: September 3, 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

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
Exhibit A	Detailed Descriptions of Services Rendered	12

EXHIBIT A

EXHIBIT A

07/30/25 18:12:11 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: 07/03/25

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

Proforma Number: 1348807

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			
02/06/25	9943685	Call with counsel for Champion-Cain regarding prisoner settlement funds, SBA loan debt, restitution order and related issues (.7) emails with L. Ryan and A. Herren re: same (.5)	Fates, Edward (Ted)	1.20	966.60	966.60	WO	HD	TR	_____
02/07/25	9943860	Discuss SBA loan issues with Receiver's staff (.6) respond to counsel for Champion-Cain re: same (.2)	Fates, Edward (Ted)	0.80	644.40	1,611.00	WO	HD	TR	_____
02/11/25	9948458	Communications with AUSA regarding Champion-Cain restitution and issue with prison settlement funds	Fates, Edward (Ted)	0.20	161.10	1,772.10	WO	HD	TR	_____
02/12/25	9949558	Call/emails with AUSA re: issues relating to Champion-Cain restitution amount, prisoner settlement funds (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	724.95	2,497.05	WO	HD	TR	_____
02/18/25	9954864	Calls with Receiver and AUSA regarding calculation of remaining restitution amount for Champion-Cain in light of distributions to investors and issues relating to class action settlement funds	Fates, Edward (Ted)	0.80	644.40	3,141.45	WO	HD	TR	_____

07/30/25 18:12:11 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 and unpaid SBA loans	Timekeeper	Hours	Fees	Sum	Circle Action			
02/24/25	9961316	Analyze issues and communicate with AUSA regarding SBA loan issues, class action settlement funds, and Champion-Cain restitution	Fates, Edward (Ted)	0.50	402.75	3,544.20	WO	HD	TR	_____
03/05/25	9976266	Analyze and advise L. Ryan on Corporate Transparency Act filing requirements	Fates, Edward (Ted)	0.30	241.65	3,785.85	WO	HD	TR	_____
03/07/25	9978387	Advise Receiver and L. Ryan and latest updates regarding Corporate Transparency Act	Fates, Edward (Ted)	0.20	161.10	3,946.95	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt	Circle Action			
01/02/25	2930941	ADV – Array - Evidence Storage Fee for November 2024	0.00	1,500.00	WO	HD	TR	_____
01/22/25	2922778	MSNGR – Messenger - First Legal LLC - Deliver to: SDSC-SAN DIEGO;	0.00	22.75	WO	HD	TR	_____
01/31/25	2922501	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for January 2025	0.00	876.00	WO	HD	TR	_____
02/03/25	2921561	MSNGR – First Legal Network - Deliver Courtesy	0.00	27.75	WO	HD	TR	_____
02/04/25	2921475	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Motion for Summary Judgment and/or Adjudication, Memorandum of Points & Authorities, Statement, Exhibit	0.00	522.31	WO	HD	TR	_____
02/10/25	2927550	DSCRCH – Document Search - PACER - Usage 4nd QTR	0.00	0.90	WO	HD	TR	_____
02/18/25	2921477	FILING – One Legal – Filing fee for Superior Court of	0.00	82.31	WO	HD	TR	_____

07/30/25 18:12:11 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				
02/28/25	2925744	California, San Diego County, Ex-Parte Application and Supporting Documents, Declaration, Proof of Service EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for February 2025	0.00	876.00	WO	HD	TR	_____
03/28/25	2927695	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Reply to Opposition, Proof of Service	0.00	21.31	WO	HD	TR	_____
03/31/25	2931447	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for March 2025	0.00	876.00	WO	HD	TR	_____
04/16/25	2930163	FILING – One Legal – Filing fee for Superior Court of California, San Diego County, Notice of Ruling, Proof of Service	0.00	21.31	WO	HD	TR	_____
04/16/25	2934034	COURT – Other Court Charges - Pamela Lewis - SD SUPERIOR CRT ROA - Purchased document.	0.00	1.00	WO	HD	TR	_____
04/30/25	2935491	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for April 2025	0.00	876.00	WO	HD	TR	_____
05/31/25	2939328	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for May 2025	0.00	876.00	WO	HD	TR	_____
06/30/25	2942566	FILING – One Legal - Filing fee for Superior Court of California, San Diego County, Reply to Opposition	0.00	20.51	WO	HD	TR	_____
06/30/25	2943925	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for June 2025	0.00	876.00	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.90	805.50	3,946.95
		4.90		\$3,946.95
Subtotal Fees				\$3,946.95
Discount				0.00
Total Fees				3,946.95
Total Disbursements				7,476.15

Attorney Billing Instructions

() BILL ALL () Hold

07/30/25 18:12:11 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	75.20	0.00	75.20	11,423.10	3,946.95	7,476.15	601,210.09	99,326.70	501,883.39
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	11,581.20	0.45	11,580.75
Billed	16,206.14	2,497.05	13,709.09	16,206.14	2,497.05	13,709.09	95,379.30	95,379.30	494,407.24
Collected	16,206.14	2,497.05	13,709.09	16,206.14	2,497.05	13,709.09	572,811.54	95,379.30	477,432.24
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	16,975.00	0.00	16,975.00
WIP	Total	Fees	Costs						
Balance	-6,684.43	3,946.95	-10,631.38						
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

07/30/25 18:12:12 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: 07/03/25

Matter Name: SEC v. Champion-Cain - Reporting

Proforma Number: 1348807

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	
01/24/25	9927510	Revisions and updates to 21st interim report (.5) discuss same with Receiver (.2) finalize report (.2)	Fates, Edward (Ted)	0.90	724.95	724.95	WO	HD	TR
02/27/25	9966679	Work on Receiver's 22nd interim report and exhibit thereto (1.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.60	1,288.80	2,013.75	WO	HD	TR
02/28/25	9968085	Communications with Receiver regarding 22nd interim report (.2) meet and confer communications with SEC counsel (.1)	Fates, Edward (Ted)	0.30	241.65	2,255.40	WO	HD	TR
05/06/25	10057615	Update and finalize Receiver's 22nd interim report for filing	Fates, Edward (Ted)	0.60	483.30	2,738.70	WO	HD	TR
05/29/25	10086071	Work on Receiver's 23rd interim report (.9) discuss same with Receiver (.1) meet and confer communication with SEC counsel (.1)	Fates, Edward (Ted)	1.10	886.05	3,624.75	WO	HD	TR
06/04/25	10095606	Meet and confer communications with SEC counsel (.1) finalize Receiver's 23rd interim report for filing (.3) discuss same	Fates, Edward (Ted)	0.50	402.75	4,027.50	WO	HD	TR

07/30/25 18:12:12 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

Trans Date	Index	Description of Service Rendered with Receiver (.1)	Timekeeper	Hours	Fees	Sum	Circle Action
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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.00	805.50	4,027.50
		5.00		\$4,027.50
Subtotal Fees				\$4,027.50
Discount				0.00
Total Fees				4,027.50
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 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	4,027.50	4,027.50	0.00	96,508.35	96,508.35	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	3,705.30	3,705.30	0.00	3,705.30	3,705.30	0.00	92,480.85	92,480.85	0.00
Collected	3,705.30	3,705.30	0.00	3,705.30	3,705.30	0.00	92,480.85	92,480.85	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4,027.50	4,027.50	0.00						
WIP	4,027.50	4,027.50	0.00						

07/30/25 18:12:12 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

Billing Address

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

07/30/25 18:12:14 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: 07/03/25

Proforma Number: 1348807

Matter Name: SEC v. Champion-Cain - Operations & Asse

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	
01/08/25	9906727	Analyze update and information relating to Casa del Zorro membership interest and potential sale of same (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.40	322.20	322.20	WO	HD	TR
01/29/25	9930934	Communications with G. Rodriguez regarding potential sale of membership interest in Casa del Zorro	Fates, Edward (Ted)	0.20	161.10	483.30	WO	HD	TR
02/26/25	9964980	Communications with G. Rodriguez regarding anticipated sale of membership interest in Casa Del Zorro	Fates, Edward (Ted)	0.20	161.10	644.40	WO	HD	TR
02/28/25	9967679	Analyze deal terms for potential sale of membership interest in Casa del Zorro and deal documents relating to ANI membership interests (1.6) discuss same with G. Rodriguez (.8) work on draft purchase and sale agreement (1.9)	Fates, Edward (Ted)	4.30	3,463.65	4,108.05	WO	HD	TR
03/03/25	9970931	Revisions to draft purchase agreement for Casa del Zorro membership interest (.8) discuss same with G. Rodriguez (.4)	Fates, Edward (Ted)	1.20	966.60	5,074.65	WO	HD	TR

07/30/25 18:12:14 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/20/25	9994030	Discuss issues relating to potential sale of Case del Zorro membership interest with G. Rodriguez	Fates, Edward (Ted)	0.20	161.10	5,235.75	WO	HD	TR	_____
04/08/25	10020670	Analyze proposed edits to draft PSA for Casa del Zorro membership interests	Fates, Edward (Ted)	0.60	483.30	5,719.05	WO	HD	TR	_____
04/09/25	10021272	Analayze and advise G. Rodriguez on issues and strategy for potential revisions to PSA for sale of Casa del Zorro membership interests	Fates, Edward (Ted)	1.40	1,127.70	6,846.75	WO	HD	TR	_____
04/10/25	10022953	Calls / emails with G. Rodrigues, prospective buyer of Case del Zorro membership interest, and buyer's counsel regarding revisions to draft purchase agreement	Fates, Edward (Ted)	0.60	483.30	7,330.05	WO	HD	TR	_____
04/14/25	10026187	Communications with G. Rodriguez re: Casa del Zorro asset purchase agreement and payment timing issue	Fates, Edward (Ted)	0.20	161.10	7,491.15	WO	HD	TR	_____
04/16/25	10029598	Work on revisions to Purchase Agreement for Casa del Zorro membership interests (.9) discuss same with G. Rodriguez (.4)	Fates, Edward (Ted)	1.30	1,047.15	8,538.30	WO	HD	TR	_____
04/17/25	10030617	Analyze and discuss final revisions to Purchase Agreement with G. Rodriguez	Fates, Edward (Ted)	0.60	483.30	9,021.60	WO	HD	TR	_____
04/18/25	10032292	Discuss revisions to Purchase Agreement with G. Rodriguez (.2) analyze same (.3)	Fates, Edward (Ted)	0.50	402.75	9,424.35	WO	HD	TR	_____

07/30/25 18:12:14 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
04/22/25	10037443	Analyze and advise G. Rodriguez on proposed assignment of membership interests and revisions to same	Fates, Edward (Ted)	0.60	483.30	9,907.65	WO	HD	TR
04/23/25	10038058	Respond to inquiry from counsel for CTC regarding Casa del Zorro refinance / purchase transaction and escrow for same (.3) communications with G. Rodriguez re: revisions to assignment agreement for Casa del Zorro (.3)	Fates, Edward (Ted)	0.60	483.30	10,390.95	WO	HD	TR
06/04/25	10095918	Advise G. Rodriguez on amendment to membership interest purchase agreement for Case del Zorro to extend deadline to complete transaction	Fates, Edward (Ted)	0.30	241.65	10,632.60	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	13.20	805.50	10,632.60
		13.20		\$10,632.60
Subtotal Fees				\$10,632.60
Discount				0.00
Total Fees				10,632.60
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

07/30/25 18:12:14 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	526.50	526.50	0.00	11,159.10	11,159.10	0.00	755,457.30	755,457.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	402.75	402.75	0.00	402.75	402.75	0.00	744,298.20	744,298.20	0.00
Collected	402.75	402.75	0.00	402.75	402.75	0.00	744,298.20	744,298.20	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	11,159.10	11,159.10	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

07/30/25 18:12:15 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: 07/03/25

Proforma Number: 1348807

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

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	
01/06/25	9903723	Analyze proposed joint motion regarding certification of order for appeal from counsel for Peterson (.4) communications with counsel for Peterson re: same (.3)	Fates, Edward (Ted)	0.70	563.85	563.85	WO	HD	TR
01/08/25	9906724	Communications with counsel for Peterson regarding motion for certification of order denying Peterson claims in receivership	Fates, Edward (Ted)	0.40	322.20	886.05	WO	HD	TR
01/09/25	9907312	Prepare status report to Ninth Circuit regarding Peterson motion for certification of order denying claims in receivership (.8) analyze Peterson status report re: same (.3) analyze Peterson motion for certification of order denying claims in receivership (.6)	Fates, Edward (Ted)	1.70	1,369.35	2,255.40	WO	HD	TR
01/10/25	9913500	Work on non-opposition brief for Peterson motion for certification under Rule 54(b) or order denying claims against receivership estate (.7) discuss	Fates, Edward (Ted)	0.90	724.95	2,980.35	WO	HD	TR

07/30/25 18:12:15 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			
		same with Receiver (.2)								
01/15/25	9914166	Finalize non-opposition to Peterson motion for certification of order denying claims in receivership	Fates, Edward (Ted)	0.10	80.55	3,060.90	WO	HD	TR	_____
02/06/25	9943674	Analyze order granting Peterson unopposed motion for certification or order denying claims against receivership for appeal (.2) communications with counsel for Peterson re: same (.2) review status report filed by Peterson with Ninth Circuit (.1)	Fates, Edward (Ted)	0.50	402.75	3,463.65	WO	HD	TR	_____
04/28/25	10042651	Analyze Ninth Circuit order affirming District Court decision denying Peterson claims against receivership estate (.3) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.40	322.20	3,785.85	WO	HD	TR	_____
04/29/25	10045747	Respond to inquiry from counsel for investor regarding future distributions	Fates, Edward (Ted)	0.20	161.10	3,946.95	WO	HD	TR	_____
05/19/25	10073355	Advise Receiver on revisions and updates to receivership website	Fates, Edward (Ted)	0.40	322.20	4,269.15	WO	HD	TR	_____
06/13/25	10107959	Respond to inquiry from trade creditor regarding future distributions	Fates, Edward (Ted)	0.20	161.10	4,430.25	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.50	805.50	4,430.25
		5.50		\$4,430.25

07/30/25 18:12:15 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
				\$4,430.25
				0.00
				4,430.25
				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	263.25	263.25	0.00	4,693.50	4,693.50	0.00	795,929.40	795,929.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,328.23	6.03	3,322.20
Billed	9,545.94	9,545.94	0.00	9,545.94	9,545.94	0.00	791,241.93	791,241.93	0.00
Collected	9,545.94	9,545.94	0.00	9,545.94	9,545.94	0.00	791,241.93	791,241.93	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	4,693.50	4,693.50	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.

07/30/25 18:12:15 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

E3 Advisors

401 West 'A' Street, Suite 1830

San Diego, CA 92101

07/30/25 18:12:16 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: 07/03/25

Proforma Number: 1348807

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

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			
01/06/25	9875621	Finalize response to E. Churilla regarding potential resolution of loan default and breach of settlement agreement	Fates, Edward (Ted)	0.30	241.65	241.65	WO	HD	TR	_____
01/15/25	9914354	Communications with E. Churilla regarding potential refinancing and plan for property listing	Fates, Edward (Ted)	0.20	161.10	402.75	WO	HD	TR	_____
02/03/25	9936685	Communications with E. Churilla regarding draft listing agreement for sale of Texas property	Fates, Edward (Ted)	0.20	161.10	563.85	WO	HD	TR	_____
02/21/25	9959637	Communications with E. Churilla regarding listing agreement for Texas property	Fates, Edward (Ted)	0.20	161.10	724.95	WO	HD	TR	_____
03/03/25	9970941	Communications with E. Churilla and Broker regarding listing agreement for Texas property	Fates, Edward (Ted)	0.30	241.65	966.60	WO	HD	TR	_____
03/05/25	9976362	Communications with E. Churilla and broker regarding proposed listing	Fates, Edward (Ted)	0.30	241.65	1,208.25	WO	HD	TR	_____

07/30/25 18:12:16 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			
		agreement for Texas property								
03/11/25	9983545	Analyze listing agreement for Churilla property in Texas from broker (.2) discuss same with Receiver and G. Rodriguez (.3) communications with Texas broker (.3)	Fates, Edward (Ted)	0.80	644.40	1,852.65	WO	HD	TR	_____
03/13/25	9985514	Communications with broker for Churillo property in Texas and G. Rodriguez re: property listing	Fates, Edward (Ted)	0.30	241.65	2,094.30	WO	HD	TR	_____
03/19/25	9992705	Communications with Churilla and broker concerning status of sale efforts for Texas property	Fates, Edward (Ted)	0.20	161.10	2,255.40	WO	HD	TR	_____
03/20/25	9994088	Work on updated report to court on status of Churilla settlement (.5) discuss same with Receiver (.2) finalize same (.2)	Fates, Edward (Ted)	0.90	724.95	2,980.35	WO	HD	TR	_____
03/25/25	10000288	Call from E. Churilla regarding list price and approach to marketing for TX property	Fates, Edward (Ted)	0.30	241.65	3,222.00	WO	HD	TR	_____
03/28/25	10004165	Communications with broker for Churilla property regarding potential offers	Fates, Edward (Ted)	0.20	161.10	3,383.10	WO	HD	TR	_____
04/10/25	10022703	Discuss issues relating to marketing of Churilla property in TX with G. Rodriguez	Fates, Edward (Ted)	0.40	322.20	3,705.30	WO	HD	TR	_____
04/21/25	10034171	Communications with E. Churilla and real estate broker regarding potential small price reduction for Texas property	Fates, Edward (Ted)	0.20	161.10	3,866.40	WO	HD	TR	_____

07/30/25 18:12:16 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			
05/05/25	10055375	Communications with G. Rodriguez, E. Churilla and TX broker regarding marketing of TX property (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	563.85	4,430.25	WO	HD	TR	_____
05/22/25	10077544	Communications with Churilla and broker for Texas property regarding renewed listing	Fates, Edward (Ted)	0.40	322.20	4,752.45	WO	HD	TR	_____
05/23/25	10079194	Communications with counsel for D'Agostino regarding settlement payment deadline	Fates, Edward (Ted)	0.20	161.10	4,913.55	WO	HD	TR	_____
05/27/25	10081997	Analyze communication from counsel for D'Agostino (.1) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.20	161.10	5,074.65	WO	HD	TR	_____
05/28/25	10083918	Communications with Receiver and counsel for D'Agostino re: settlement and payment issues	Fates, Edward (Ted)	0.60	483.30	5,557.95	WO	HD	TR	_____
05/29/25	10085910	Communications with Receiver and counsel for D'Agostino regarding wire instructions and settlement payment	Fates, Edward (Ted)	0.20	161.10	5,719.05	WO	HD	TR	_____
05/30/25	10089787	Discuss settlement payment from D'Agostino with Receiver	Fates, Edward (Ted)	0.10	80.55	5,799.60	WO	HD	TR	_____
06/03/25	10094827	Communications with E. Churilla and G. Rodriguez regarding lack of offers for TX property and potential listing price reduction	Fates, Edward (Ted)	0.70	563.85	6,363.45	WO	HD	TR	_____

Proforma Summary

07/30/25 18:12:16 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	7.90	805.50	6,363.45
		7.90		\$6,363.45
Subtotal Fees				\$6,363.45
Discount				0.00
Total Fees				6,363.45
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,842.75	1,842.75	0.00	8,206.20	8,206.20	0.00	1,068,572.70	1,068,572.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	78.49	68.49	10.00
Billed	19,170.90	19,170.90	0.00	19,170.90	19,170.90	0.00	1,060,301.25	1,060,301.25	0.00
Collected	19,170.90	19,170.90	0.00	19,170.90	19,170.90	0.00	1,060,301.25	1,060,301.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	8,206.20	8,206.20	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

07/30/25 18:12:16 PROFORMA STATEMENT FOR MATTER 378827.00007 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Third Party Recov)

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

07/30/25 18:12:17 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: 07/03/25

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

Proforma Number: 1348807

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			
04/16/25	10030007	Meet and confer communications with SEC counsel re: fee applications	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	_____
05/08/25	10059950	Update and finalize Receiver interim fee application for filing	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
() BILL FEES ONLY
() BILL COST ONLY

() Hold
() Write Off
() Transfer All

07/30/25 18:12:17 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	402.75	402.75	0.00	20,376.45	20,376.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,530.45	1,530.45	0.00	1,530.45	1,530.45	0.00	19,973.70	19,973.70	0.00
Collected	1,530.45	1,530.45	0.00	1,530.45	1,530.45	0.00	19,973.70	19,973.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	402.75	402.75	0.00						
WIP	402.75	402.75	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

07/30/25 18:12:19 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: 07/03/25

Proforma Number: 1348807

Matter Name: General Clawback Claims & Settlements

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			
01/03/25	9902450	Analyze notice of appeal filed by D'Agostino and advise Receiver re: same	Fates, Edward (Ted)	0.40	322.20	322.20	WO	HD	TR	_____
01/06/25	9903783	Discuss issues and strategy regarding D'Agostino with Receiver (.4) communications with counsel for D'Agostino re: same (.1)	Fates, Edward (Ted)	0.50	402.75	724.95	WO	HD	TR	_____
01/07/25	9905359	Communications with counsel for D'Agostino regarding possible settlement and related issues (.4) discuss same with Receiver (.2) analyze scheduling order for D'Agostino appeal (.1)	Fates, Edward (Ted)	0.70	563.85	1,288.80	WO	HD	TR	_____
01/08/25	9907276	Discuss potential judgment enforcement steps regarding D'Agostino with Receiver	Fates, Edward (Ted)	0.20	161.10	1,449.90	WO	HD	TR	_____
01/13/25	9911295	Follow up settlement communications with counsel for D'Agostino	Fates, Edward (Ted)	0.30	241.65	1,691.55	WO	HD	TR	_____

07/30/25 18:12:19 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			
01/14/25	9913246	Analyze settlement communication from counsel for D'Agostino and advise Receiver re: same (.7) prepare responsive settlement communication to counsel for D'Agostino (.6)	Fates, Edward (Ted)	1.30	1,047.15	2,738.70	WO	HD	TR	_____
01/16/25	9915355	Analyze order from Ninth Circuit mediator and respond to same on potential settlement and mediation issues for D'Agostino appeal (.5) communications with counsel for D'Agostino (.1)	Fates, Edward (Ted)	0.60	483.30	3,222.00	WO	HD	TR	_____
01/17/25	9916692	Call/emails with counsel for D'Agostino regarding settlement issues (.7) discuss same with Receiver (.2) work on draft settlement agreement (1.4)	Fates, Edward (Ted)	2.30	1,852.65	5,074.65	WO	HD	TR	_____
01/21/25	9920036	Discuss draft settlement agreement with D'Agostino with Receiver (.4) discuss same with counsel for D'Agostino (.3)	Fates, Edward (Ted)	0.70	563.85	5,638.50	WO	HD	TR	_____
01/24/25	9930325	Communications with counsel for D'Agostino regarding settlement agreement	Fates, Edward (Ted)	0.30	241.65	5,880.15	WO	HD	TR	_____
01/30/25	9931643	Communications with counsel for D'Agostino regarding revisions to draft settlement agreement (.5) work on further revisions to same (.4)	Fates, Edward (Ted)	0.90	724.95	6,605.10	WO	HD	TR	_____
02/03/25	9938636	Communications with counsel for D'Agostino regarding revisions to settlement agreement (.2) work on same (.2) discuss same and execution of agreement with Receiver (.3)	Fates, Edward (Ted)	0.70	563.85	7,168.95	WO	HD	TR	_____

07/30/25 18:12:19 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		
02/04/25	9939929	Discuss D'Agostino settlement issues with Receiver (.1) communications with counsel for D'Agostino re: execution of agreement and wire instructions (.2)	Fates, Edward (Ted)	0.30	241.65	7,410.60	WO	HD	TR
02/06/25	9942491	Communications with counsel for D'Agostino regarding execution of settlement agreement and dismissal of pending appeal (.4) advise Receiver re: same (.1) review proposed stipulation to dismiss appeal (.1)	Fates, Edward (Ted)	0.60	483.30	7,893.90	WO	HD	TR
02/10/25	9946428	Communications with counsel for D'Agostino regarding filing of stipulation to dismiss appeal of judgment	Fates, Edward (Ted)	0.20	161.10	8,055.00	WO	HD	TR

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	10.00	805.50	8,055.00
		10.00		\$8,055.00
Subtotal Fees				\$8,055.00
Discount				0.00
Total Fees				8,055.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic); no text editing; copies @ .10

07/30/25 18:12:19 PROFORMA STATEMENT FOR MATTER 378827.00011 (Krista Freitag, as Receiver for ANI Deve) (General Clawback Claims & Settlements)

Account Summary – As Of 07/30/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	125.10	125.10	0.00	8,180.10	8,180.10	0.00	1,435,235.40	1,435,235.40	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	9,895.50	9,895.50	0.00	9,895.50	9,895.50	0.00	1,427,055.30	1,427,055.30	0.00
Collected	9,895.50	9,895.50	0.00	9,895.50	9,895.50	0.00	1,427,055.30	1,427,055.30	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>8,180.10</i>	<i>8,180.10</i>	<i>0.00</i>						
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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