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12 Attorneys for Receiver
13 KRISTA L. FREITAG

14 UNITED STATES DISTRICT COURT
15 SOUTHERN DISTRICT OF CALIFORNIA
16

17 SECURITIES AND EXCHANGE
COMMISSION,

18 Plaintiff,

19 v.

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

22 Defendants,

23 AMERICAN NATIONAL
24 INVESTMENTS, INC.,

25 Relief Defendant.

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

**SEVENTH 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 25, 2022
Time: 11:30 a.m.
Courtroom: 14A
Judge: Hon. Larry A. Burns

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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 Seventh Interim Application for Payment of Fees and Reimbursement
 6 of Expenses (the "Application"). This Application covers the period from April 1,
 7 2021 through June 30, 2021 (the "Application Period"), and seeks approval of
 8 \$402,196.95 in fees and \$31,196.55 in expenses, and an order authorizing the
 9 Receiver to pay, on an interim basis, 80% of the fees incurred (\$321,757.56) and
 10 100% of the expenses incurred (\$31,196.55).

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 (the "Commission").
 15 The Receiver was appointed on September 3, 2019, pursuant to the Order; Granting
 16 The Parties' Joint Motion And Stipulated Request By All Parties For A Preliminary
 17 Injunction Order And Order (1) Freezing Assets; (2) Requiring Accountings; (3)
 18 Prohibiting Destruction Of Documents; And (4) Appointing A Permanent Receiver
 19 (the "Appointment Order") (Dkt. 6).

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

Allen Matkins to assist with legal issues facing the receivership estate and the firm promptly began work, including assisting with the takeover of the enterprises and securing their assets.

This Application should be read in conjunction with the Receiver's Eighth Interim Report and Recommendations ("Eighth Report") filed on August 20, 2021 (Dkt. 699), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$402,196.95 in fees for a total of 725.50 hours worked, and payment on an interim basis of 80% of that amount, or \$321,757.56. 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 | 1.20 | \$734.40 |
| Asset Investigation & Recovery | 43.60 | \$22,619.25 |
| Reporting | 17.00 | \$10,668.15 |
| Operations & Asset Sales | 42.60 | \$22,233.60 |
| Claims & Distributions | 48.10 | \$30,675.60 |
| Third Party Recoveries | 236.00 | \$150,101.55 |
| Pending Litigation | 5.90 | \$3,610.80 |
| Employment/Professional Fees | 1.80 | \$1,101.60 |
| General Clawback Claims & Settlements | 311.50 | \$148,532.85 |
| Claims Against Kim Peterson et al. | 17.80 | \$11,919.15 |
| Total Fees | 725.50 | \$402,196.95 |

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

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

II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.

A. Categories and Descriptions of Work.

1. General Receivership.

Allen Matkins' work in this category relates to the related criminal case, including communications with the United States Attorney's Office and counsel for Gina Champion-Cain ("GCC") regarding sentencing and restitution issues. The firm also advised the Receiver regarding certain tax issues regarding the Receivership Entities. The reasonable and necessary fees for Allen Matkins' work in this category total \$734.40.

2. Asset Investigation & Recovery.

The substantial services in this category relate generally to efforts to identify, secure, preserve, investigate and recover receivership assets. The overriding goals of this work have been to identify and marshal receivership assets and investigate the foundation for claims in order to recover assets and pursue claims against third parties; all in an effort to maximize the distributions to victims of the scheme. The tasks performed include the following:

- Issuing subpoenas to financial institutions, lenders, recipients of potential receivership assets, and others involved with or otherwise connected to the Receivership Entities or receivership assets in some manner;
- Issuing demand and asset turnover letters to recipients believed to be in possession of receivership assets in order to enable the Receiver to recover and gain control over the assets;

- 1 • Gathering, organizing, and reviewing documents and information
- 2 obtained from third parties;
- 3 • Analyzing investor loans and associated documentation.

4 Allen Matkins also assisted the Receiver in recovering shares of stock in
5 Endeavor Bank, which shares had been purchased with ANI funds and were held by
6 GCC. The shares were recovered and the Receiver was able to sell them through a
7 licensed broker.

8 Allen Matkins also advised the Receiver on issues relating to her forensic
9 accounting, including the scope of the accounting, classification of certain
10 transactions, analysis of potential recoveries and claims, and related issues. Finally,
11 the firm assisted the Receiver in analyzing the receivership estate's rights and
12 interests under certain insurance policies, including preparing a claim against ANI's
13 crime/theft insurance policy based on the guilty pleas entered by Defendant Gina
14 Champion-Cain and former ANI employee Cris Torres in the related criminal cases.
15 The Receiver, with the assistance of counsel, was later able to resolve the claim and
16 recover \$150,000 from the carrier for the receivership estate. The reasonable and
17 necessary fees for Allen Matkins' work in this category total \$22,619.25.

18 3. Reporting.

19 Allen Matkins' services in this category include assisting in preparing the
20 Receiver's Seventh Interim Report and Recommendations, which was filed on
21 May 27, 2021. Dkt. 671. The 16-page report includes a detailed summary of the
22 Receiver's activities, funds recovered, real and personal property assets, restaurant
23 and retail operations, property taxes, insurance, debt service, loans and other
24 investments, investigation of third party claims, pending litigation, and other
25 matters. The report also details the receipts and disbursements for the receivership
26 estate since the Receiver's appointment and provides her recommendations for the
27 continued administration of the receivership.

28

Allen Matkins also assisted in preparing the Receiver's Forensic Accounting Report, which was filed on April 30, 2021. Dkt. 659. The 23-page report includes a detailed discussion of the sources and uses of funds raised by and expended by Gina Champion-Cain and the Receivership Entities. The reasonable and necessary fees for Allen Matkins' work in this category total \$10,668.15.

4. Operations & Asset Sales.

Allen Matkins' work in this category focused on the sale of assets and the various businesses owned and operated by the Receivership Entities, including but not limited to restaurants, cafes, apartments, construction projects, leased properties, and other receivership properties. In summary, work within this category included the following:

- Drafting purchase and sale agreements, commercial and residential leases and lease amendments, where necessary and appropriate, for various receivership businesses and properties, as well as handling related title, loan, and contract issues;
- Assisting with closing documents for real property sales, and with escrow agreements and related documents relating to sales of liquor licenses associated with closed restaurants;
- Preparing motions, declarations, proposed orders, and notices regarding non-receipt of overbids (as applicable) for Court approval of sales of the following: 3816 Mission Boulevard, 140 Keller Street in Petaluma, and 1775 Diamond Street.

The reasonable and necessary fees for Allen Matkins' work in this category total \$22,233.60.

5. Claims & Distributions.

Services rendered in this category generally relate to the claims and interests of investors and creditors of the Receivership Entities. Allen Matkins assisted with issues related to disseminating information about the receivership to investors and

1 creditors, including information provided on the receivership website
2 (www.anireceivership.com). The firm also assisted in responding to direct inquiries
3 from investors and creditors.

4 Allen Matkins assisted the Receiver in formulating proposed procedures for
5 the efficient administration of claims against the receivership estate and in preparing
6 the Receiver's motion for approval of such procedures, including proposed notices
7 and claim forms, all of which were approved by the Court on October 14, 2021.
8 Dkt. 681, 716.

9 Allen Matkins assisted the Receiver in analyzing proposed joint motions
10 relating to the treatment of claims of investors who settle their claims with Chicago
11 Title, along with the terms of the settlement agreements and the potential effect such
12 settlements would have on the receivership estate and the interests of non-settling
13 investors.

14 Allen Matkins assisted in analyzing claims asserted by attorney James Lance
15 with regard to real estate investments he had made with Gina Champion-Cain,
16 through their respective entities. The claims were resolved through a settlement
17 agreement, subject to Court approval. The firm prepared a motion for approval of
18 the settlement, which was approved on November 9, 2021. Dkt. 687, 727.

19 Allen Matkins also assisted the Receiver in addressing the claims and
20 mechanic's liens asserted by the lender, the City of West Sacramento, the general
21 contractor and various subcontractors, respectively, associated with the partially
22 constructed apartment building located at 301 D Street in West Sacramento. The
23 firm also assisted in analyzing and addressing issues with various liens and claims
24 asserted by vendors, contractors, government agencies and former employees,
25 including tax claims and wage claims. The reasonable and necessary fees for Allen
26 Matkins' work in this category total \$30,675.60.

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28

1 6. Third Party Recoveries.

2 This portion of the Application pertains to work on potential claims against
3 third parties to recover amounts for the benefit of the receivership estate. Due to the
4 confidential nature of the legal work on these matters and the Receiver's litigation
5 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith
6 to file this portion of the Application under seal. The reasonable and necessary fees
7 for Allen Matkins' work in this category total \$150,101.55.

8 7. Pending Litigation.

9 Services performed in this category include the analysis and management of
10 pending pre-receivership actions in which one or more of the Receivership Entities
11 are parties. Specifically, work within this category was largely devoted to the action
12 pending in Florida state court known as *Westlink Dev. Co., LLC v. SunTrust Bank*,
13 Pensacola, FL Cir. Ct. Case No. 13-008139-CI, in which Westlink Development,
14 LLC (a Receivership Entity) and other co-plaintiffs have asserted claims against
15 SunTrust Bank for aiding and abetting a multi-million dollar Ponzi scheme allegedly
16 orchestrated by John Condo (separate from the alleged Ponzi scheme in this action).

17 Allen Matkins also assisted with issues relating to the action pending in San
18 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San
19 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative
20 class action filed by a former employee (which action is now stayed pursuant to the
21 litigation stay in the Appointment Order). The reasonable and necessary fees for
22 Allen Matkins' work in this category total \$3,610.80.

23 8. Employment/Professional Fees

24 Although fee applications are a necessary component of federal equity
25 receiverships, neither the Receiver nor her professionals charge for time spent
26 preparing their own detailed applications. Allen Matkins assisted in preparing the
27 Receiver's Fourth Interim Fee Application and with meet and confer
28 communications with counsel for the Commission. The fee applications were filed

1 on May 28, 2021 (Dkt. 672, 673) and approved on November 5, 2021. (Dkt. 721,
2 722). The reasonable and necessary fees for Allen Matkins' work in this category
3 total \$1,101.60.

4 9. General Clawback Claims & Settlements.

5 This portion of the Application pertains to work on potential clawback claims
6 and settlements against third parties to recover amounts for the benefit of the
7 receivership estate. Due to the confidential nature of the legal work on these matters
8 and the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a
9 motion concurrently herewith to file this portion of the Application under seal. The
10 reasonable and necessary fees for Allen Matkins' work in this category total
11 \$148,532.85.

12 10. Claims Against Kim Peterson.

13 This portion of the Application pertains to work on claims against Kim
14 Peterson and his entities to recover amounts for the benefit of the receivership
15 estate. Due to the confidential nature of the legal work on these matters and the
16 Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion
17 concurrently herewith to file this portion of the Application under seal. The
18 reasonable and necessary fees for Allen Matkins' work in this category total
19 \$11,919.15.

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

21 Allen Matkins requests that the Court approve reimbursement of \$31,196.55
22 in out-of-pocket costs. The itemization of such expenses is summarized below by
23 billing category.

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| Category | Total |
|----------------------------------|-------------|
| Telephonic Appearance | \$94.00 |
| Deposition/Court Transcript Fees | \$3,282.00 |
| Messenger/FedEx Fees | \$138.46 |
| Service of Process | \$349.30 |
| Court/Filing Fees | \$86.80 |
| Duplication | \$590.10 |
| PACER/Document Research | \$287.16 |
| E-Discovery | \$24,003.73 |
| Investigative Service | \$2,365.00 |
| Total | \$31,196.55 |

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

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.

22 Allen Matkins has submitted a detailed fee application which describes the
23 nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to
24 staff matters as efficiently as possible while remaining cognizant of the complexity
25 of issues presented. As noted above, the request for fees is based on Allen Matkins'
26 customary billing rates charged for comparable services provided in other matters,
27 less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for
28 4.70 hours of work (\$2,992.50 in fees).

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

11 **III. CONCLUSION.**

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

- 13 1. Approving Allen Matkins' fees of \$402,196.95;
- 14 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 15 \$321,757.56, from the assets of the Receivership Entities;
- 16 3. Approving Allen Matkins' costs in the amount of \$31,196.55, and
 17 authorizing and directing the Receiver to reimburse such costs in full; and
- 18 4. For such other and further relief as the Court deems appropriate.

19
 20 Dated: May 19, 2022

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

21
 22 By: s/Edward G. Fates

23 DAVID R. ZARO
 24 EDWARD G. FATES
 25 MATTHEW D. PHAM
 26 Attorneys for Receiver
 27 KRISTA FREITAG
 28

EXHIBIT INDEX

| EXHIBIT NO. | DESCRIPTION | PAGE NO. |
|--------------------|--|-----------------|
| Exhibit A | Detailed Descriptions of Services Rendered | 16 |

EXHIBIT A

EXHIBIT A

03/10/22 14:55:44 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: 11/17/21

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

Proforma Number: 1149833

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 | |
|------------|---------|--|---------------------|-------|--------|--------|--------|--------|----|
| 04/14/21 | 8411533 | Advise Receiver re: issues with closing certain entities and preparing final tax returns | Fates, Edward (Ted) | 0.30 | 183.60 | 183.60 | WO | HD | TR |
| 05/13/21 | 8442384 | Communications with Receiver and AUSA for related criminal matters | Fates, Edward (Ted) | 0.10 | 61.20 | 244.80 | WO | HD | TR |
| 05/14/21 | 8443449 | Call with AUSA re: related criminal matters and restitution order issues | Fates, Edward (Ted) | 0.30 | 183.60 | 428.40 | WO | HD | TR |
| 06/30/21 | 8491671 | Communications with AUSA re: issues in related criminal matters | Fates, Edward (Ted) | 0.50 | 306.00 | 734.40 | WO | HD | TR |

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

| Trans Date | Index | Type | Quantity | Amt | Circle | Action | |
|------------|---------|--|----------|----------|--------|--------|----|
| 04/01/21 | 2705119 | COURTC – CourtCall, LLC - San Diego Superior Court, Judge Ronald L. Styn | 0.00 | 94.00 | WO | HD | TR |
| 04/01/21 | 2705956 | EDISC – CS Disco, Inc. - Monthly Hosting for April 2021 | 0.00 | 2,342.91 | WO | HD | TR |
| 04/01/21 | 2705983 | EDISC – CS Disco, Inc. - Monthly Hosting for April 2021 | 0.00 | 562.50 | WO | HD | TR |

03/10/22 14:55:44 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 | | | | |
|------------|---------|--|----------|--------|----|----|----|-------|
| 04/02/21 | 2703613 | BW – Duplication - Black & White Copies | 18.00 | 1.80 | WO | HD | TR | _____ |
| 04/02/21 | 2703614 | COLOR – Duplication - Color Copies | 4.00 | 0.40 | WO | HD | TR | _____ |
| 04/02/21 | 2704491 | MSNGR – Federal Express - Ship To: Frank R Perrot, Esq | 0.00 | 20.07 | WO | HD | TR | _____ |
| 04/07/21 | 2703994 | BW – Duplication - Black & White Copies | 255.00 | 25.50 | WO | HD | TR | _____ |
| 04/07/21 | 2703995 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 04/07/21 | 2704383 | INV – JF Zimmelman & Associates - Investigation for Randolph Houts | 0.00 | 375.00 | WO | HD | TR | _____ |
| 04/07/21 | 2704384 | INV – JF Zimmelman & Associates - SW Bank Search | 0.00 | 375.00 | WO | HD | TR | _____ |
| 04/07/21 | 2704385 | INV – JF Zimmelman & Associates - NW Bank Search | 0.00 | 620.00 | WO | HD | TR | _____ |
| 04/07/21 | 2704386 | INV – JF Zimmelman & Associates - NW Bank Search | 0.00 | 995.00 | WO | HD | TR | _____ |
| 04/08/21 | 2707183 | COURT – -San Diego Superior Court,Obtain copies of Minute Orders from Court's docket. | 0.00 | 4.00 | WO | HD | TR | _____ |
| 04/09/21 | 2705585 | POS – Nationwide Legal, LLC - JPMorgan Chase Bank, N.A., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION | 0.00 | 108.30 | WO | HD | TR | _____ |
| 04/09/21 | 2711703 | POS – Service of Process - Nationwide Legal LLC - Daryl Slattery - Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action; | 0.00 | 241.00 | WO | HD | TR | _____ |
| 04/12/21 | 2704603 | BW – Duplication - Black & White Copies | 124.00 | 12.40 | WO | HD | TR | _____ |
| 04/12/21 | 2707184 | COURT – -San Diego Superior Court,Obtain copy of Minute Order from Court's docket. | 0.00 | 1.00 | WO | HD | TR | _____ |
| 04/13/21 | 2704767 | COLOR – Duplication - Color Copies | 3.00 | 0.30 | WO | HD | TR | _____ |

03/10/22 14:55:44 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 | | | | |
|-------------------|--------------|--|-----------------|------------|----|----|----|-------|
| 04/13/21 | 2706534 | MSNGR – Federal Express - Ship To: Frank R Perrot, Esq | 0.00 | 15.69 | WO | HD | TR | _____ |
| 04/13/21 | 2707185 | COURT – -San Diego Superior Court,Obtain copies of Minute Orders from Court's docket. | 0.00 | 10.00 | WO | HD | TR | _____ |
| 04/13/21 | 2712541 | RSRCH – Lexis | 0.00 | 79.20 | WO | HD | TR | _____ |
| 04/15/21 | 2704996 | DEPO – Ott Reporting, Inc. - Transcript from 04/12/2021 hearing | 0.00 | 41.40 | WO | HD | TR | _____ |
| 04/16/21 | 2705049 | BW – Duplication - Black & White Copies | 53.00 | 5.30 | WO | HD | TR | _____ |
| 04/16/21 | 2705127 | DEPO – Veritext, LLC - Deposition Transcript of Josh Bullock Taken on 04/09/2021 | 0.00 | 2,126.50 | WO | HD | TR | _____ |
| 04/19/21 | 2707187 | COURT – -San Diego Superior Court,Obtain copy of Notice of Case Assignment from Court's docket | 0.00 | 3.00 | WO | HD | TR | _____ |
| 04/20/21 | 2705313 | BW – Duplication - Black & White Copies | 266.00 | 26.60 | WO | HD | TR | _____ |
| 04/20/21 | 2706584 | MSNGR – Federal Express - Ship To: Tracey Huntington | 0.00 | 13.71 | WO | HD | TR | _____ |
| 04/21/21 | 2705719 | DEPO – Veritext, LLC - Deposition Transcript of Blake Allred Taken on 03/22/2021 | 0.00 | 1,114.10 | WO | HD | TR | _____ |
| 04/22/21 | 2705772 | COLOR – Duplication - Color Copies | 3.00 | 0.30 | WO | HD | TR | _____ |
| 04/22/21 | 2708086 | MSNGR – Federal Express - Ship To: Frank R Perrott | 0.00 | 20.03 | WO | HD | TR | _____ |
| 04/22/21 | 2708182 | MSNGR – Federal Express - Ship To: Amanda Moghaddam, Esq | 0.00 | 13.71 | WO | HD | TR | _____ |
| 04/22/21 | 2708212 | MSNGR – Federal Express - Ship To: Scott Metzger, Esq | 0.00 | 13.71 | WO | HD | TR | _____ |
| 04/26/21 | 2707005 | BW – Duplication - Black & White Copies | 5.00 | 0.50 | WO | HD | TR | _____ |
| 04/26/21 | 2709344 | COURT – -San Diego Superior Court,Obtain copies of Minute Orders from investor lawsuits against Chicago Title. | 0.00 | 51.60 | WO | HD | TR | _____ |
| 04/26/21 | 2709347 | COURT – -San Diego Superior Court,Obtain copy of Answer from Court docket. | 0.00 | 10.20 | WO | HD | TR | _____ |

03/10/22 14:55:44 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 | | | | |
|-------------------|--------------|---|-----------------|------------|----|----|----|-------|
| 04/29/21 | 2707657 | BW – Duplication - Black & White Copies | 51.00 | 5.10 | WO | HD | TR | _____ |
| 04/29/21 | 2707658 | COLOR – Duplication - Color Copies | 2.00 | 0.20 | WO | HD | TR | _____ |
| 04/30/21 | 2708772 | BW – Duplication - Black & White Copies | 39.00 | 3.90 | WO | HD | TR | _____ |
| 05/01/21 | 2711240 | EDISC – CS Disco, Inc. - Monthly Hosting for May 2021 | 0.00 | 2,342.91 | WO | HD | TR | _____ |
| 05/03/21 | 2708929 | BW – Duplication - Black & White Copies | 51.00 | 5.10 | WO | HD | TR | _____ |
| 05/03/21 | 2708930 | COLOR – Duplication - Color Copies | 1.00 | 0.10 | WO | HD | TR | _____ |
| 05/04/21 | 2709099 | BW – Duplication - Black & White Copies | 102.00 | 10.20 | WO | HD | TR | _____ |
| 05/07/21 | 2712744 | RSRCH – Lexis | 0.00 | 19.80 | WO | HD | TR | _____ |
| 05/10/21 | 2709498 | BW – Duplication - Black & White Copies | 145.00 | 14.50 | WO | HD | TR | _____ |
| 05/10/21 | 2709499 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 05/10/21 | 2712745 | RSRCH – Lexis | 0.00 | 19.80 | WO | HD | TR | _____ |
| 05/10/21 | 2719190 | DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage | 0.00 | 1.20 | WO | HD | TR | _____ |
| 05/10/21 | 2719191 | DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage | 0.00 | 33.80 | WO | HD | TR | _____ |
| 05/10/21 | 2719192 | DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage | 0.00 | 2.60 | WO | HD | TR | _____ |
| 05/10/21 | 2719193 | DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage | 0.00 | 2.20 | WO | HD | TR | _____ |
| 05/11/21 | 2709768 | BW – Duplication - Black & White Copies | 141.00 | 14.10 | WO | HD | TR | _____ |
| 05/11/21 | 2709769 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |

03/10/22 14:55:44 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 | | | | |
|-------------------|--------------|---|-----------------|------------|----|----|----|-------|
| 05/12/21 | 2709947 | BW – Duplication - Black & White Copies | 181.00 | 18.10 | WO | HD | TR | _____ |
| 05/12/21 | 2709948 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |
| 05/13/21 | 2710223 | BW – Duplication - Black & White Copies | 141.00 | 14.10 | WO | HD | TR | _____ |
| 05/13/21 | 2710224 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |
| 05/17/21 | 2710521 | BW – Duplication - Black & White Copies | 150.00 | 15.00 | WO | HD | TR | _____ |
| 05/17/21 | 2710522 | COLOR – Duplication - Color Copies | 9.00 | 0.90 | WO | HD | TR | _____ |
| 05/18/21 | 2710640 | BW – Duplication - Black & White Copies | 161.00 | 16.10 | WO | HD | TR | _____ |
| 05/18/21 | 2710641 | COLOR – Duplication - Color Copies | 4.00 | 0.40 | WO | HD | TR | _____ |
| 05/19/21 | 2710970 | BW – Duplication - Black & White Copies | 426.00 | 42.60 | WO | HD | TR | _____ |
| 05/19/21 | 2710971 | COLOR – Duplication - Color Copies | 17.00 | 1.70 | WO | HD | TR | _____ |
| 05/20/21 | 2711044 | BW – Duplication - Black & White Copies | 190.00 | 19.00 | WO | HD | TR | _____ |
| 05/20/21 | 2711045 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |
| 05/21/21 | 2711439 | BW – Duplication - Black & White Copies | 95.00 | 9.50 | WO | HD | TR | _____ |
| 05/21/21 | 2711440 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 05/24/21 | 2711620 | BW – Duplication - Black & White Copies | 239.00 | 23.90 | WO | HD | TR | _____ |
| 05/24/21 | 2711621 | COLOR – Duplication - Color Copies | 10.00 | 1.00 | WO | HD | TR | _____ |
| 05/25/21 | 2711907 | BW – Duplication - Black & White Copies | 190.00 | 19.00 | WO | HD | TR | _____ |

03/10/22 14:55:44 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 | | | | |
|-------------------|--------------|---|-----------------|------------|----|----|----|-------|
| 05/25/21 | 2711908 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 05/25/21 | 2719401 | DCSRCH – Research - First Legal LLC - Allen Matkins; Order Granting Sale of 3816 Mission Blvd.; Advance \$15.00 | 0.00 | 53.00 | WO | HD | TR | _____ |
| 05/26/21 | 2715966 | COURT – -San Diego Superior Court,Obtain copy of 5/13/2021 Minute Order from Court's docket. | 0.00 | 1.00 | WO | HD | TR | _____ |
| 05/26/21 | 2716832 | MSNGR – Federal Express - Ship To: Tracey Huntington, Escrow Off | 0.00 | 13.79 | WO | HD | TR | _____ |
| 05/27/21 | 2714085 | BW – Duplication - Black & White Copies | 283.00 | 28.30 | WO | HD | TR | _____ |
| 05/27/21 | 2714086 | COLOR – Duplication - Color Copies | 12.00 | 1.20 | WO | HD | TR | _____ |
| 05/27/21 | 2715967 | COURT – -San Diego Superior Court,Obtain Copy of 5/20/2021 Order from Court Docket. | 0.00 | 3.00 | WO | HD | TR | _____ |
| 05/28/21 | 2715230 | BW – Duplication - Black & White Copies | 205.00 | 20.50 | WO | HD | TR | _____ |
| 05/28/21 | 2715231 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |
| 06/01/21 | 2716496 | EDISC – CS Disco, Inc. - Monthly Hosting for June 2021 | 0.00 | 2,342.91 | WO | HD | TR | _____ |
| 06/01/21 | 2716531 | EDISC – CS Disco, Inc. - Monthly Hosting for June 2021 | 0.00 | 16,412.50 | WO | HD | TR | _____ |
| 06/02/21 | 2715492 | BW – Duplication - Black & White Copies | 48.00 | 4.80 | WO | HD | TR | _____ |
| 06/02/21 | 2715493 | COLOR – Duplication - Color Copies | 1.00 | 0.10 | WO | HD | TR | _____ |
| 06/03/21 | 2715677 | BW – Duplication - Black & White Copies | 280.00 | 28.00 | WO | HD | TR | _____ |
| 06/03/21 | 2715678 | COLOR – Duplication - Color Copies | 11.00 | 1.10 | WO | HD | TR | _____ |
| 06/04/21 | 2715753 | BW – Duplication - Black & White Copies | 94.00 | 9.40 | WO | HD | TR | _____ |
| 06/04/21 | 2715754 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |

03/10/22 14:55:44 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

| Trans Date | Index | Type | Quantity | Amt | | | | |
|-------------------|--------------|---|-----------------|------------|----|----|----|-------|
| 06/07/21 | 2715850 | BW – Duplication - Black & White Copies | 190.00 | 19.00 | WO | HD | TR | _____ |
| 06/07/21 | 2715851 | COLOR – Duplication - Color Copies | 10.00 | 1.00 | WO | HD | TR | _____ |
| 06/07/21 | 2720910 | RSRCH – Lexis | 0.00 | 75.56 | WO | HD | TR | _____ |
| 06/08/21 | 2715994 | BW – Duplication - Black & White Copies | 47.00 | 4.70 | WO | HD | TR | _____ |
| 06/08/21 | 2715995 | COLOR – Duplication - Color Copies | 2.00 | 0.20 | WO | HD | TR | _____ |
| 06/08/21 | 2715998 | BW – Duplication - Black & White Copies | 280.00 | 28.00 | WO | HD | TR | _____ |
| 06/08/21 | 2715999 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 06/09/21 | 2716213 | BW – Duplication - Black & White Copies | 94.00 | 9.40 | WO | HD | TR | _____ |
| 06/09/21 | 2716214 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |
| 06/09/21 | 2716217 | BW – Duplication - Black & White Copies | 95.00 | 9.50 | WO | HD | TR | _____ |
| 06/09/21 | 2716218 | COLOR – Duplication - Color Copies | 7.00 | 0.70 | WO | HD | TR | _____ |
| 06/10/21 | 2716300 | COLOR – Duplication - Color Copies | 2.00 | 0.20 | WO | HD | TR | _____ |
| 06/10/21 | 2716302 | BW – Duplication - Black & White Copies | 188.00 | 18.80 | WO | HD | TR | _____ |
| 06/10/21 | 2716303 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 06/11/21 | 2716580 | COLOR – Duplication - Color Copies | 1.00 | 0.10 | WO | HD | TR | _____ |
| 06/11/21 | 2718673 | COURT – -San Diego Superior Court,Obtain copy of Order from Court docket. | 0.00 | 2.00 | WO | HD | TR | _____ |
| 06/14/21 | 2716649 | COLOR – Duplication - Color Copies | 1.00 | 0.10 | WO | HD | TR | _____ |

03/10/22 14:55:44 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

| Trans Date | Index | Type | Quantity | Amt | | | | |
|-------------------|--------------|---|-----------------|------------|----|----|----|-------|
| 06/14/21 | 2718672 | COURT – -San Diego Superior Court,Obtain copy of Request for Continuance from Court docket. | 0.00 | 1.00 | WO | HD | TR | _____ |
| 06/15/21 | 2717115 | BW – Duplication - Black & White Copies | 4.00 | 0.40 | WO | HD | TR | _____ |
| 06/17/21 | 2717551 | BW – Duplication - Black & White Copies | 122.00 | 12.20 | WO | HD | TR | _____ |
| 06/17/21 | 2717552 | COLOR – Duplication - Color Copies | 9.00 | 0.90 | WO | HD | TR | _____ |
| 06/17/21 | 2719708 | MSNGR – Federal Express - Ship To: American National Investments, | 0.00 | 13.82 | WO | HD | TR | _____ |
| 06/18/21 | 2717810 | BW – Duplication - Black & White Copies | 161.00 | 16.10 | WO | HD | TR | _____ |
| 06/18/21 | 2717811 | COLOR – Duplication - Color Copies | 14.00 | 1.40 | WO | HD | TR | _____ |
| 06/21/21 | 2717922 | BW – Duplication - Black & White Copies | 101.00 | 10.10 | WO | HD | TR | _____ |
| 06/21/21 | 2717923 | COLOR – Duplication - Color Copies | 6.00 | 0.60 | WO | HD | TR | _____ |
| 06/22/21 | 2718169 | BW – Duplication - Black & White Copies | 99.00 | 9.90 | WO | HD | TR | _____ |
| 06/22/21 | 2718170 | COLOR – Duplication - Color Copies | 4.00 | 0.40 | WO | HD | TR | _____ |
| 06/23/21 | 2718540 | BW – Duplication - Black & White Copies | 189.00 | 18.90 | WO | HD | TR | _____ |
| 06/23/21 | 2718541 | COLOR – Duplication - Color Copies | 9.00 | 0.90 | WO | HD | TR | _____ |
| 06/24/21 | 2718847 | BW – Duplication - Black & White Copies | 142.00 | 14.20 | WO | HD | TR | _____ |
| 06/24/21 | 2718848 | COLOR – Duplication - Color Copies | 8.00 | 0.80 | WO | HD | TR | _____ |
| 06/24/21 | 2721945 | MSNGR – Federal Express - Ship To: American National Investments, | 0.00 | 13.93 | WO | HD | TR | _____ |
| 06/25/21 | 2718946 | BW – Duplication - Black & White Copies | 9.00 | 0.90 | WO | HD | TR | _____ |

03/10/22 14:55:44 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

| Trans Date | Index | Type | Quantity | Amt | WO | HD | TR | |
|------------|---------|---|----------|------|----|----|----|-------|
| 06/28/21 | 2719077 | COLOR – Duplication - Color Copies | 2.00 | 0.20 | WO | HD | TR | _____ |
| 06/29/21 | 2719352 | BW – Duplication - Black & White Copies | 1.00 | 0.10 | WO | HD | TR | _____ |
| 06/29/21 | 2719353 | COLOR – Duplication - Color Copies | 4.00 | 0.40 | WO | HD | TR | _____ |

Proforma Summary**Timekeeper**

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|-------|--------|-----------|
| 001665 | Fates, Edward (Ted) | 1.20 | 612.00 | 734.40 |
| | | 1.20 | | \$734.40 |
| Subtotal Fees | | | | \$734.40 |
| Discount | | | | 0.00 |
| Total Fees | | | | 734.40 |
| Total Disbursements | | | | 31,196.55 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|--------------|------------|----------|-----------|--------------|----------|-------|------------|-----------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 8,682.30 | 8,090.10 | 592.20 | 5,313.15 | 5,313.15 | 0.00 | 180,422.00 | 71,861.85 | 108,560.15 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 232.19 | 0.45 | 231.74 |
| Billed | 60,505.06 | 2,983.50 | 57,521.56 | 0.00 | 0.00 | 0.00 | 55,998.90 | 55,998.90 | 77,363.60 |
| Collected | 60,505.06 | 2,983.50 | 57,521.56 | 0.00 | 0.00 | 0.00 | 133,362.50 | 55,998.90 | 77,363.60 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

03/10/22 14:55:44 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

| | <i>Total</i> | <i>Fees</i> | <i>Costs</i> |
|----------------------------|--------------------------|-------------------------|--------------------------|
| <i>WIP</i> | <i>247,016.53</i> | <i>15,862.50</i> | <i>231,154.03</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

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00003 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 11/17/21 Matter Name: SEC v. Champion-Cain - Asset Investigati
 Proforma Number: 1149833
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|------------|---------|--|---------------------|-------|--------|----------|--------|--------|----|
| 04/06/21 | 8403846 | Discuss investor accounting issue and subpoena for records re: same with Receiver | Fates, Edward (Ted) | 0.30 | 183.60 | 183.60 | WO | HD | TR |
| 04/09/21 | 8407093 | Call with Receiver and S. Hoslett re: approach and content to further forensic analysis and report | Fates, Edward (Ted) | 1.60 | 979.20 | 1,162.80 | WO | HD | TR |
| 04/09/21 | 8410642 | Draft and serve subpoenas on J.P. Morgan and individual investor (.8). | Aspis, Norman | 0.80 | 356.40 | 1,519.20 | WO | HD | TR |
| 04/13/21 | 8410119 | Discuss issues/next steps re: Endeavor shares and potential sale of same with Receiver | Fates, Edward (Ted) | 0.20 | 122.40 | 1,641.60 | WO | HD | TR |
| 04/14/21 | 8412982 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.30 | 90.45 | 1,732.05 | WO | HD | TR |
| 04/14/21 | 8414452 | Review document production from investors and Western Alliance and transmit the same to the Receiver (.7). | Aspis, Norman | 0.70 | 311.85 | 2,043.90 | WO | HD | TR |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | | |
|------------|---------|--|---------------|-------|----------|----------|--------|--------|----|-------|
| 04/15/21 | 8414446 | Confer with JP Morgan representative regarding outstanding subpoena (.5). | Aspis, Norman | 0.50 | 222.75 | 2,266.65 | WO | HD | TR | _____ |
| 04/16/21 | 8416055 | Evaluate draft of the forensic accounting report of Receiver, assess the narrative report and email. | Zaro, David | 0.60 | 483.30 | 2,749.95 | WO | HD | TR | _____ |
| 04/19/21 | 8418865 | Conference with counsel concerning the accounting report, forensic issues and follow-up regarding same (.4). Review/provide revisions, address issues related to the draft report and email with counsel (1.3). | Zaro, David | 1.70 | 1,369.35 | 4,119.30 | WO | HD | TR | _____ |
| 04/22/21 | 8421475 | Confer with counsel for Merit Financial and I. Awerbuch regarding subpoena to JPMorgan Chase (.3). | Aspis, Norman | 0.30 | 133.65 | 4,252.95 | WO | HD | TR | _____ |
| 04/26/21 | 8425835 | Analysis of the draft forensic accounting report, work on narrative, follow-up revisions and communications with counsel related to forensic accounting (1.4). Several emails and evaluate the Receiver's draft narrative (.5). | Zaro, David | 1.90 | 1,530.45 | 5,783.40 | WO | HD | TR | _____ |
| 04/27/21 | 8431501 | Review responses to subpoena (.5). | Aspis, Norman | 0.50 | 222.75 | 6,006.15 | WO | HD | TR | _____ |
| 04/28/21 | 8431419 | Review productions in response to subpoenas (.6). | Aspis, Norman | 0.60 | 267.30 | 6,273.45 | WO | HD | TR | _____ |
| 04/29/21 | 8427146 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.30 | 90.45 | 6,363.90 | WO | HD | TR | _____ |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|--|---------------|-------|--------|----------|---------------|----|----|-------|
| 04/30/21 | 8428878 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.30 | 90.45 | 6,454.35 | WO | HD | TR | _____ |
| 04/30/21 | 8430635 | Review documents produced in response to subpoenas and gather the same for transmittal to client (.4). | Aspis, Norman | 0.40 | 178.20 | 6,632.55 | WO | HD | TR | _____ |
| 05/04/21 | 8436464 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.50 | 150.75 | 6,783.30 | WO | HD | TR | _____ |
| 05/04/21 | 8459489 | Review records produced in response to subpoena (.4). | Aspis, Norman | 0.40 | 178.20 | 6,961.50 | WO | HD | TR | _____ |
| 05/05/21 | 8436467 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.50 | 150.75 | 7,112.25 | WO | HD | TR | _____ |
| 05/05/21 | 8459183 | Review document productions and confer with counsel regarding the same (.3). | Aspis, Norman | 0.30 | 133.65 | 7,245.90 | WO | HD | TR | _____ |
| 05/06/21 | 8436483 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.10 | 30.15 | 7,276.05 | WO | HD | TR | _____ |
| 05/06/21 | 8458968 | Review incoming productions and confer with L. Ryan regarding the same (.4). | Aspis, Norman | 0.40 | 178.20 | 7,454.25 | WO | HD | TR | _____ |
| 05/12/21 | 8441455 | Evaluate the letter from Hiscox related to the claim as to Torres (.6). | Zaro, David | 0.60 | 483.30 | 7,937.55 | WO | HD | TR | _____ |
| 05/13/21 | 8445579 | Update tracking charts regarding recent incoming document productions. | Neglia, Ross | 1.20 | 361.80 | 8,299.35 | WO | HD | TR | _____ |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|-------------------|--------------|--|---------------------|--------------|-------------|------------|---------------|---------------|----|
| 05/13/21 | 8446400 | Several emails, review draft report and email advice to counsel as to narrative/taxes. | Zaro, David | 0.40 | 322.20 | 8,621.55 | WO | HD | TR |
| 05/14/21 | 8443366 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.30 | 90.45 | 8,712.00 | WO | HD | TR |
| 05/19/21 | 8449687 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.20 | 60.30 | 8,772.30 | WO | HD | TR |
| 05/19/21 | 8454740 | Review production from Desert Lake Advisors and attention to technical issue in connection with production (.5). | Aspis, Norman | 0.50 | 222.75 | 8,995.05 | WO | HD | TR |
| 05/24/21 | 8451724 | Analyze update and request for note amendment from BayMedica | Fates, Edward (Ted) | 0.30 | 183.60 | 9,178.65 | WO | HD | TR |
| 05/25/21 | 8453916 | Discuss BayMedica note extension issues with Receiver | Fates, Edward (Ted) | 0.20 | 122.40 | 9,301.05 | WO | HD | TR |
| 05/25/21 | 8455878 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.30 | 90.45 | 9,391.50 | WO | HD | TR |
| 05/25/21 | 8459866 | Review revised production from Desert Lake Advisors and confer with L. Ryan regarding the same (.3). | Aspis, Norman | 0.30 | 133.65 | 9,525.15 | WO | HD | TR |
| 05/28/21 | 8460473 | Ingest production in response to subpoena and transmit to K. Freitag (.3). | Aspis, Norman | 0.30 | 133.65 | 9,658.80 | WO | HD | TR |
| 05/28/21 | 8460811 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.50 | 150.75 | 9,809.55 | WO | HD | TR |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---|------------------|-------|----------|-----------|---------------|----|----|-------|
| 06/01/21 | 8468290 | Attention to incoming third-party productions | Neglia, Ross | 0.40 | 120.60 | 9,930.15 | WO | HD | TR | _____ |
| 06/02/21 | 8465834 | Telephone conference, analysis and review of prior protective order re: strategy for enforcement of Merit Financial subpoena. | Farrell, Michael | 0.40 | 295.20 | 10,225.35 | WO | HD | TR | _____ |
| 06/03/21 | 8470899 | Emails with counsel/Receiver, evaluate emails related to settlements and litigation issues (.5). Conference call with Receiver/counsel related to the mandatory settlement conference and CTC litigation (.6). Evaluate the email related to CTC demands for discovery and follow-up regarding same (.3). | Zaro, David | 1.40 | 1,127.70 | 11,353.05 | WO | HD | TR | _____ |
| 06/07/21 | 8470997 | Analysis and investigation of the Hiscox response, legal foundation and review cases (1.2). Meeting with counsel to address the legal issues and response (.4). | Zaro, David | 1.60 | 1,288.80 | 12,641.85 | WO | HD | TR | _____ |
| 06/08/21 | 8473678 | Read through documents including communications between David Zaro and opposing counsel, caselaw provided by David Zaro relating to the matter and commercial crime insurance policies to begin research for assignment. | Ahmar, Gina | 1.60 | 324.00 | 12,965.85 | WO | HD | TR | _____ |
| 06/11/21 | 8473736 | Researched crime insurance policies and relevant caselaw and began drafting response letter to insurer for receivership assignment. | Ahmar, Gina | 4.10 | 830.25 | 13,796.10 | WO | HD | TR | _____ |
| 06/14/21 | 8475844 | Call with David Zaro regarding progress on Receivership matter. | Ahmar, Gina | 0.40 | 81.00 | 13,877.10 | WO | HD | TR | _____ |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|--|----------------------|-------|--------|-----------|---------------|----|----|-------|
| 06/14/21 | 8475847 | Researched caselaw regarding coverage exclusions for crime insurance. | Ahmar, Gina | 0.90 | 182.25 | 14,059.35 | WO | HD | TR | _____ |
| 06/14/21 | 8475849 | Continued to research caselaw for crime insurance coverage. | Ahmar, Gina | 1.90 | 384.75 | 14,444.10 | WO | HD | TR | _____ |
| 06/14/21 | 8476378 | Several emails, legal analysis of the Hiscox policy and advice as to the letter response. | Zaro, David | 0.70 | 563.85 | 15,007.95 | WO | HD | TR | _____ |
| 06/14/21 | 8479237 | Review Dobron related productions and determine transmittal status of same to K. Freitag (.5). | Aspis, Norman | 0.50 | 222.75 | 15,230.70 | WO | HD | TR | _____ |
| 06/14/21 | 8483759 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.30 | 90.45 | 15,321.15 | WO | HD | TR | _____ |
| 06/15/21 | 8476588 | Review correspondence to and from insurer in connection with prospective claim, confer with counsel regarding necessary legal analysis, and review additional materials provided by counsel (1.0). | Del Castillo, Joshua | 1.00 | 612.00 | 15,933.15 | WO | HD | TR | _____ |
| 06/15/21 | 8478045 | Further research and work on the Hiscox insurance coverage claim and confer with counsel as to legal issues. | Zaro, David | 0.60 | 483.30 | 16,416.45 | WO | HD | TR | _____ |
| 06/15/21 | 8479943 | Edited draft of letter to opposing counsel based on new research findings. | Ahmar, Gina | 1.60 | 324.00 | 16,740.45 | WO | HD | TR | _____ |
| 06/17/21 | 8478994 | Review draft correspondence and memorandum in connection with Torres' claims; emails with counsel regarding same (0.5). | Del Castillo, Joshua | 0.50 | 306.00 | 17,046.45 | WO | HD | TR | _____ |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|-------------------|--------------|---|----------------------|--------------|-------------|------------|---------------|---------------|----|
| 06/17/21 | 8483117 | Email/advice to counsel related to the Hiscox letter, follow-up. | Zaro, David | 0.40 | 322.20 | 17,368.65 | WO | HD | TR |
| 06/17/21 | 8483827 | Analysis and determination of document productions in preparation for attorney review. | Peng, Simona | 0.10 | 30.15 | 17,398.80 | WO | HD | TR |
| 06/18/21 | 8483132 | Evaluate draft letter, legal analysis related to the Hiscox claim/insurance cover, call with counsel. | Zaro, David | 1.20 | 966.60 | 18,365.40 | WO | HD | TR |
| 06/18/21 | 8494721 | Review and confirm that all Dobron productions have been transmitted to the Receiver (.4). | Aspis, Norman | 0.40 | 178.20 | 18,543.60 | WO | HD | TR |
| 06/21/21 | 8483161 | Work on the draft letter response to Hiscox Insurance Co.'s denial of coverage, including review of case law and the plea agreement. | Zaro, David | 1.90 | 1,530.45 | 20,074.05 | WO | HD | TR |
| 06/22/21 | 8483373 | Review and revise demand letter to Hiscox (0.8). | Del Castillo, Joshua | 0.80 | 489.60 | 20,563.65 | WO | HD | TR |
| 06/22/21 | 8485953 | Further revisions to the draft letter to Hiscox, follow-up with Receiver ocounsel as to claims against insurer. | Zaro, David | 0.80 | 644.40 | 21,208.05 | WO | HD | TR |
| 06/23/21 | 8486113 | Further revisions, finalize letter to Mr. McCall and follow-up to address requirements to pursue claims to recover on crime policy (1.2). Emails with counsel/call as to insurance claims (.4). | Zaro, David | 1.60 | 1,288.80 | 22,496.85 | WO | HD | TR |
| 06/29/21 | 8489978 | Analyze updated information re: ANI investment in BayMedica | Fates, Edward (Ted) | 0.20 | 122.40 | 22,619.25 | WO | HD | TR |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

Proforma Summary

Timekeeper

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|----------------------|-------|--------|-------------|
| 000313 | Zaro, David | 15.40 | 805.50 | 12,404.70 |
| 000739 | Farrell, Michael | 0.40 | 738.00 | 295.20 |
| 001665 | Fates, Edward (Ted) | 2.80 | 612.00 | 1,713.60 |
| 001842 | Del Castillo, Joshua | 2.30 | 612.00 | 1,407.60 |
| 002307 | Peng, Simona | 3.70 | 301.50 | 1,115.55 |
| 002369 | Aspis, Norman | 6.90 | 445.50 | 3,073.95 |
| 002448 | Neglia, Ross | 1.60 | 301.50 | 482.40 |
| 002475 | Ahmar, Gina | 10.50 | 202.50 | 2,126.25 |
| | | 43.60 | | \$22,619.25 |
| Subtotal Fees | | | | \$22,619.25 |
| Discount | | | | 0.00 |
| Total Fees | | | | 22,619.25 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|--------------|------------|-------------|--------------|--------------|----------|-------|------------|------------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 58,967.10 | 58,967.10 | 0.00 | 6,198.75 | 6,198.75 | 0.00 | 520,896.40 | 511,767.90 | 9,128.50 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 3,073.13 | 7.65 | 3,065.48 |
| Billed | 114,574.32 | 114,574.32 | 0.00 | 0.00 | 0.00 | 0.00 | 301,311.90 | 301,311.90 | 9,128.50 |
| Collected | 114,574.32 | 114,574.32 | 0.00 | 0.00 | 0.00 | 0.00 | 310,440.40 | 301,311.90 | 9,128.50 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | | Fees | Costs | | | | | | |

03/10/22 00:22:36 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

| | | | |
|---------------------|-------------------|-------------------|-------------------|
| WIP | 341,924.35 | 206,186.85 | 135,737.50 |
| Balance | | | |
| AR Balance | 0.00 | 0.00 | 0.00 |
| Unalloc | 0.00 | | |
| Payment | | | |
| Client Trust | 0.00 | | |
| Balance | | | |

Billing Address

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

03/10/22 00:22:38 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: 11/17/21 Matter Name: SEC v. Champion-Cain - Reporting
 Proforma Number: 1149833
 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 | |
|------------|---------|---|---------------------|-------|----------|----------|--------|--------|----|
| 04/15/21 | 8412042 | Discuss content and approach to forensic accounting report with Receiver | Fates, Edward (Ted) | 0.40 | 244.80 | 244.80 | WO | HD | TR |
| 04/16/21 | 8413104 | Initial review of draft forensic accounting report (.5) discuss same with Receiver (.4) | Fates, Edward (Ted) | 0.90 | 550.80 | 795.60 | WO | HD | TR |
| 04/19/21 | 8414652 | Analyze and revise Receiver's forensic accounting report (2.4) discuss content and approach to same with Receiver and counsel (.7) | Fates, Edward (Ted) | 3.10 | 1,897.20 | 2,692.80 | WO | HD | TR |
| 04/20/21 | 8415668 | Further revisions to Receiver's draft forensic report (.9) discuss content and approach to report with Receiver and counsel (1.2) | Fates, Edward (Ted) | 2.10 | 1,285.20 | 3,978.00 | WO | HD | TR |
| 04/20/21 | 8418877 | Evaluate the draft of the narrative report/forensic accounting (.4). Prepare for/attend the meeting with the Receiver related to the forensic report/accounting and advice concerning the narrative report (1.4). | Zaro, David | 1.80 | 1,449.90 | 5,427.90 | WO | HD | TR |
| 04/26/21 | 8421706 | Work on revisions to forensic accounting report (2.7) discuss same with Receiver (.5) | Fates, Edward (Ted) | 3.40 | 2,080.80 | 7,508.70 | WO | HD | TR |

03/10/22 00:22:38 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|------------|---------|---|---------------------|-------|--------|-----------|--------|--------|----------|
| | | call with counsel for SEC re: forensic accounting report (.2) | | | | | | | |
| 04/27/21 | 8423399 | Discuss revisions/updates to forensic accounting report with Receiver | Fates, Edward (Ted) | 0.30 | 183.60 | 7,692.30 | WO | HD | TR _____ |
| 04/27/21 | 8425846 | Conference with counsel related to the accounting and the narrative report. | Zaro, David | 0.20 | 161.10 | 7,853.40 | WO | HD | TR _____ |
| 04/28/21 | 8424710 | Discuss updates/revisions to forensic accounting report with Receiver | Fates, Edward (Ted) | 0.20 | 122.40 | 7,975.80 | WO | HD | TR _____ |
| 04/29/21 | 8426810 | Discuss revisions to forensic report and plan for finalizing same with Receiver (.3) call with SEC counsel re: draft forensic report (.2) | Fates, Edward (Ted) | 0.50 | 306.00 | 8,281.80 | WO | HD | TR _____ |
| 04/30/21 | 8429104 | Calls/emails with Receiver to discuss revisions to forensic report and exhibits thereto (.9) revise and finalize report (.6) | Fates, Edward (Ted) | 1.50 | 918.00 | 9,199.80 | WO | HD | TR _____ |
| 05/12/21 | 8441072 | Work on revisions to Receiver's 7th interim report | Fates, Edward (Ted) | 1.30 | 795.60 | 9,995.40 | WO | HD | TR _____ |
| 05/13/21 | 8442158 | Discuss revisions to 7th interim report with Receiver (.2) meet and confer communications with SEC counsel re: same (.1) | Fates, Edward (Ted) | 0.30 | 183.60 | 10,179.00 | WO | HD | TR _____ |
| 05/27/21 | 8457264 | Work on revisions/updates to 7th interim report (.4) discuss same with Receiver and finalize report (.3) | Fates, Edward (Ted) | 0.70 | 428.40 | 10,607.40 | WO | HD | TR _____ |
| 06/07/21 | 8473662 | Conference with David Zaro to discuss and introduce SEC Receivership case assignment. | Ahmar, Gina | 0.30 | 60.75 | 10,668.15 | WO | HD | TR _____ |

03/10/22 00:22:38 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

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

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

Proforma Summary**Timekeeper**

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|-------|--------|-------------|
| 000313 | Zaro, David | 2.00 | 805.50 | 1,611.00 |
| 001665 | Fates, Edward (Ted) | 14.70 | 612.00 | 8,996.40 |
| 002475 | Ahmar, Gina | 0.30 | 202.50 | 60.75 |
| | | 17.00 | | \$10,668.15 |
| Subtotal Fees | | | | \$10,668.15 |
| Discount | | | | 0.00 |
| Total Fees | | | | 10,668.15 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|--------------|------------|-------------|--------------|--------------|----------|-------|-----------|-----------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 5,670.00 | 5,670.00 | 0.00 | 2,046.60 | 2,046.60 | 0.00 | 73,420.20 | 73,420.20 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Billed | 2,509.20 | 2,509.20 | 0.00 | 0.00 | 0.00 | 0.00 | 40,552.65 | 40,552.65 | 0.00 |
| Collected | 2,509.20 | 2,509.20 | 0.00 | 0.00 | 0.00 | 0.00 | 40,552.65 | 40,552.65 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | | Fees | Costs | | | | | | |

03/10/22 00:22:38 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

| | | | |
|---------------------|------------------|------------------|-------------|
| WIP | 32,867.55 | 32,867.55 | 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

03/10/22 00:22:39 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: 11/17/21 Matter Name: SEC v. Champion-Cain - Operations & Asse
 Proforma Number: 1149833
 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 | |
|------------|---------|--|---------------------|-------|--------|----------|--------|--------|----|
| 04/05/21 | 8402899 | Analyze and advise on issues for 140 Keller Street auction (.3) attend auction (.4) address issues re: amendments needed to winning bid PSA and back-up bid PSA (.3) initial work on notice of results of auction (.1) | Fates, Edward (Ted) | 1.10 | 673.20 | 673.20 | WO | HD | TR |
| 04/05/21 | 8403083 | Discuss issues re: potential sale of Endeavor Bank stock with Receiver | Fates, Edward (Ted) | 0.20 | 122.40 | 795.60 | WO | HD | TR |
| 04/05/21 | 8403183 | Review status of 140 Keller. | Lorenzen, Jonathan | 0.40 | 217.80 | 1,013.40 | WO | HD | TR |
| 04/05/21 | 8409084 | Draft First Amendment to 140 Keller St LLC Overbid PSA. | Palmer, Lauren | 0.50 | 157.50 | 1,170.90 | WO | HD | TR |
| 04/05/21 | 8409085 | Draft Second Amendment to Cara Recine & Anthony Sanchez Overbid PSA. | Palmer, Lauren | 0.40 | 126.00 | 1,296.90 | WO | HD | TR |
| 04/05/21 | 8424187 | Begin drafting the high bidder and back up bidder amendments for the 140 Keller Street property. | Hawn, Megan | 0.60 | 221.40 | 1,518.30 | WO | HD | TR |

03/10/22 00:22:39 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 | | | |
|------------|---------|---|---------------------|-------|--------|----------|---------------|----|----|-------|
| 04/06/21 | 8403790 | Work on notice of results of auction for 140 Keller Street and amended proposed order (.4) advise Receiver re: potential sale of minority interest in Wave Soda entity (.4) | Fates, Edward (Ted) | 0.80 | 489.60 | 2,007.90 | WO | HD | TR | _____ |
| 04/06/21 | 8404098 | Review Amendments for 140 Keller. | Lorenzen, Jonathan | 0.60 | 326.70 | 2,334.60 | WO | HD | TR | _____ |
| 04/06/21 | 8424208 | Edit and revise the backup bidder and high bidder amendments for the 140 Keller Street property; correspond with the client re: such amendments. | Hawn, Megan | 1.10 | 405.90 | 2,740.50 | WO | HD | TR | _____ |
| 04/08/21 | 8406529 | Address issues re brokerage account agreement for sale of Endeavor Bank shares | Fates, Edward (Ted) | 0.40 | 244.80 | 2,985.30 | WO | HD | TR | _____ |
| 04/09/21 | 8407794 | Communications with G. Rodriguez re: PSA amendments for winning bidder and back up bidder for 140 Keller Street | Fates, Edward (Ted) | 0.20 | 122.40 | 3,107.70 | WO | HD | TR | _____ |
| 04/12/21 | 8409317 | Finalize notice of results of 140 Keller Street auction and PSA exhibits | Fates, Edward (Ted) | 0.30 | 183.60 | 3,291.30 | WO | HD | TR | _____ |
| 04/13/21 | 8409779 | Review status of sale of 3816 Mission property. | Lorenzen, Jonathan | 0.20 | 108.90 | 3,400.20 | WO | HD | TR | _____ |
| 04/13/21 | 8424340 | Begin drafting the second purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard. | Hawn, Megan | 1.30 | 479.70 | 3,879.90 | WO | HD | TR | _____ |
| 04/14/21 | 8411513 | Review new Purchase and Sale Agreement for 3816 Mission. | Lorenzen, Jonathan | 0.30 | 163.35 | 4,043.25 | WO | HD | TR | _____ |

03/10/22 00:22:39 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 | | |
|------------|---------|---|---------------------|-------|--------|----------|--------|--------|----|-------|
| 04/14/21 | 8424342 | Continue drafting, editing and revising the second purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard. | Hawn, Megan | 1.80 | 664.20 | 4,707.45 | WO | HD | TR | _____ |
| 04/15/21 | 8412065 | Review correspondence for 3816 Mission. | Lorenzen, Jonathan | 0.20 | 108.90 | 4,816.35 | WO | HD | TR | _____ |
| 04/15/21 | 8413102 | Communications with Receiver and court clerk re: revisions to proposed order for 140 Keller Street sale motion | Fates, Edward (Ted) | 0.30 | 183.60 | 4,999.95 | WO | HD | TR | _____ |
| 04/15/21 | 8424354 | Edit and revise the second purchase and sale agreement with Mauricio Schwartzman for the property located at 3816 Mission Boulevard; correspond with the client re: such revised draft of the agreement. | Hawn, Megan | 0.30 | 110.70 | 5,110.65 | WO | HD | TR | _____ |
| 04/19/21 | 8415133 | Review correspondence regarding 3816 Mission. | Lorenzen, Jonathan | 0.10 | 54.45 | 5,165.10 | WO | HD | TR | _____ |
| 04/19/21 | 8415197 | Review order approving sale of 140 Keller Street and advise Receiver re: same | Fates, Edward (Ted) | 0.20 | 122.40 | 5,287.50 | WO | HD | TR | _____ |
| 04/20/21 | 8416147 | Discuss potential sale of Swell Coffee-related trademarks with Receiver (.2) discuss issues with first sale of 3816 Mission property and motion to approve second sale with G. Rodriguez (.3) initial work on second sale motion (.4) | Fates, Edward (Ted) | 0.90 | 550.80 | 5,838.30 | WO | HD | TR | _____ |
| 04/21/21 | 8417197 | Work on second motion to approve sale of 3816 Mission Blvd. (.9) discuss same with Receiver and G. Rodriguez (.3) discuss SFG foreclosure notice with Receiver and G. Rodriguez (.2) discuss sale closing | Fates, Edward (Ted) | 1.60 | 979.20 | 6,817.50 | WO | HD | TR | _____ |

03/10/22 00:22:39 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 issues for 140 Keller Street with Receiver (.2) | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|--|---------------------|-------|--------|----------|---------------|----|----|-------|
| 04/22/21 | 8419162 | Review terms of liquor license transfer for Lamont. | Lorenzen, Jonathan | 0.20 | 108.90 | 6,926.40 | WO | HD | TR | _____ |
| 04/22/21 | 8419326 | Work on revisions to 3816 Mission Blvd sale motion (.4) work on Receiver declaration re: same (.5) | Fates, Edward (Ted) | 0.90 | 550.80 | 7,477.20 | WO | HD | TR | _____ |
| 04/22/21 | 8420912 | Attention to liquor license transfer agreement. | Klinger, Warren | 1.00 | 508.50 | 7,985.70 | WO | HD | TR | _____ |
| 04/23/21 | 8420309 | Review status of 140 Keller property. | Lorenzen, Jonathan | 0.20 | 108.90 | 8,094.60 | WO | HD | TR | _____ |
| 04/23/21 | 8420310 | Finalize 3816 Mission sale motion documents, communications with Receiver re: same | Fates, Edward (Ted) | 0.30 | 183.60 | 8,278.20 | WO | HD | TR | _____ |
| 04/26/21 | 8421599 | Review order re: truncated briefing schedule for second sale motion re: 3816 Mission property and advise Receiver re: same | Fates, Edward (Ted) | 0.10 | 61.20 | 8,339.40 | WO | HD | TR | _____ |
| 04/27/21 | 8423733 | Discuss naming rights and assignment issue raised by ANICO with Receiver (.2) discuss broker issues for potential sale of Endeavor shares with Receiver (.2) | Fates, Edward (Ted) | 0.40 | 244.80 | 8,584.20 | WO | HD | TR | _____ |
| 04/27/21 | 8424222 | Review correspondence regarding Lamont liquor license (0.2); review correspondence and related Agreement regarding 140 Keller Street property (0.3). | Lorenzen, Jonathan | 0.50 | 272.25 | 8,856.45 | WO | HD | TR | _____ |
| 04/27/21 | 8424401 | Develop strategy re: the Assignment of Membership Agreements for the sale of the | Hawn, Megan | 0.30 | 110.70 | 8,967.15 | WO | HD | TR | _____ |

03/10/22 00:22:39 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 | | | |
|------------|---------|--|---------------------|-------|----------|-----------|---------------|----|----|-------|
| | | property located at 140 Keller Street to Fillmore Capital Acquisitions. | | | | | | | | |
| 04/27/21 | 8426864 | Prepare liquor license transfer agreement for Patio on Lamont. | Klinger, Warren | 3.50 | 1,779.75 | 10,746.90 | WO | HD | TR | _____ |
| 04/28/21 | 8424971 | Review status of 140 Keller. | Lorenzen, Jonathan | 0.20 | 108.90 | 10,855.80 | WO | HD | TR | _____ |
| 04/28/21 | 8427594 | Prepare liquor license transfer PSA. | Klinger, Warren | 2.50 | 1,271.25 | 12,127.05 | WO | HD | TR | _____ |
| 04/28/21 | 8428017 | Prepare for and attend telephone call with Geno Rodriguez re: the assignment of the membership agreements pertaining to the property located at 140 Keller Street; prepare the closing documents for the sale of the property located at 140 Keller Street. | Hawn, Megan | 1.80 | 664.20 | 12,791.25 | WO | HD | TR | _____ |
| 04/29/21 | 8427615 | Prepare liquor license transfer PSA. | Klinger, Warren | 1.40 | 711.90 | 13,503.15 | WO | HD | TR | _____ |
| 04/30/21 | 8429100 | Calls with Receiver and brokerage firm re: sale of Endeavor shares and potential brokerage account agreement for same (.6) analyze terms and issues with proposed account agreement (.5) advise G. Rodriguez on Adam Lewis Construction lien issues for 140 Keller Street closing (.3) | Fates, Edward (Ted) | 1.40 | 856.80 | 14,359.95 | WO | HD | TR | _____ |
| 05/03/21 | 8432972 | Calls/emails with G. Rodriguez re: Adam Lewis Construction lien issues (.4) communications with counsel for Adam Lewis Construction re: same (.5) | Fates, Edward (Ted) | 0.90 | 550.80 | 14,910.75 | WO | HD | TR | _____ |

03/10/22 00:22:39 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 | | |
|------------|---------|--|---------------------|-------|--------|-----------|--------|--------|----|-------|
| 05/04/21 | 8434375 | Discuss issues re: brokerage account set up for potential sale of Endeavor shares with Receiver | Fates, Edward (Ted) | 0.20 | 122.40 | 15,033.15 | WO | HD | TR | _____ |
| 05/05/21 | 8434389 | Communications with G. Rodriguex re: 140 Keller Street closing issues (.2) advise Receiver on issues re: potential sale of Swell trademarks (.1) | Fates, Edward (Ted) | 0.30 | 183.60 | 15,216.75 | WO | HD | TR | _____ |
| 05/06/21 | 8439738 | Revise liquor license purchase and sale agreement (Lamont). | Klinger, Warren | 1.10 | 559.35 | 15,776.10 | WO | HD | TR | _____ |
| 05/11/21 | 8439960 | Review revised brokerage account agreement for sale of Endeavor Bank shares, communications with Receiver re: same | Fates, Edward (Ted) | 0.30 | 183.60 | 15,959.70 | WO | HD | TR | _____ |
| 05/12/21 | 8440790 | Advise Receiver re: responses to media inquiries (.2) work on accountings of costs of sale for MB Surf Rider, OB Surf Rider, and 140 Keller Street properties (.4) | Fates, Edward (Ted) | 0.60 | 367.20 | 16,326.90 | WO | HD | TR | _____ |
| 05/18/21 | 8446293 | Communications with G. Rodriguez re: overbid deadline and lack of overbids for 3816 Mission property (.1) prepare notice re: non-receipt of overbids (.2) | Fates, Edward (Ted) | 0.30 | 183.60 | 16,510.50 | WO | HD | TR | _____ |
| 05/20/21 | 8449374 | Communications with counsel for lender re: 3816 Mission sale issues | Fates, Edward (Ted) | 0.20 | 122.40 | 16,632.90 | WO | HD | TR | _____ |
| 05/25/21 | 8453787 | Review order approving sale of 3816 Mission and advise Receiver re: same | Fates, Edward (Ted) | 0.40 | 244.80 | 16,877.70 | WO | HD | TR | _____ |
| 06/04/21 | 8466852 | Communications with G. Rodriguez re: sale of 1775 Diamond property (.2) work on sale approval motion (1.4) | Fates, Edward (Ted) | 1.60 | 979.20 | 17,856.90 | WO | HD | TR | _____ |

03/10/22 00:22:39 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 | | | |
|------------|---------|---|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 06/07/21 | 8482822 | Work on revisions to 1775 Diamond sale approval motion (.5) discuss same with Receiver (.1) work on Receiver declaration in support of sale motion (.4) finalize sale approval motion papers (.1) | Fates, Edward (Ted) | 1.10 | 673.20 | 18,530.10 | WO | HD | TR | _____ |
| 06/08/21 | 8483213 | Communications with Receiver re: steps toward sale of Endeavor Bank shares | Fates, Edward (Ted) | 0.20 | 122.40 | 18,652.50 | WO | HD | TR | _____ |
| 06/10/21 | 8472254 | Advise Receiver re: issues relating to sale of Endeavor Bank shares | Fates, Edward (Ted) | 0.30 | 183.60 | 18,836.10 | WO | HD | TR | _____ |
| 06/15/21 | 8476469 | Prepare accounting of costs of sale for 3816 Mission Blvd. | Fates, Edward (Ted) | 0.40 | 244.80 | 19,080.90 | WO | HD | TR | _____ |
| 06/16/21 | 8479012 | Analysis of changes made to purchase and sale agreement for new buyer. | Klinger, Warren | 1.00 | 508.50 | 19,589.40 | WO | HD | TR | _____ |
| 06/17/21 | 8479288 | Analysis of Liquor License purchase and sale agreement regarding comments from new prospective buyer. | Klinger, Warren | 2.10 | 1,067.85 | 20,657.25 | WO | HD | TR | _____ |
| 06/18/21 | 8486817 | Attention to purchase and sale agreement with new buyer for Patio on Lamont. | Klinger, Warren | 0.50 | 254.25 | 20,911.50 | WO | HD | TR | _____ |
| 06/27/21 | 8488023 | Analysis of purchase and sale agreement and escrow instructions for liquor license transfer. | Klinger, Warren | 2.40 | 1,220.40 | 22,131.90 | WO | HD | TR | _____ |
| 06/28/21 | 8491482 | Attention to escrow instructions. | Klinger, Warren | 0.20 | 101.70 | 22,233.60 | WO | HD | TR | _____ |

Proforma Summary

03/10/22 00:22:39 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

Timekeeper

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|--------------|-------------|----------------|
| 001665 | Fates, Edward (Ted) | 15.90 | 612.00 | 9,730.80 |
| 002115 | Lorenzen, Jonathan | 2.90 | 544.50 | 1,579.05 |
| 002283 | Klinger, Warren | 15.70 | 508.50 | 7,983.45 |
| 002306 | Hawn, Megan | 7.20 | 369.00 | 2,656.80 |
| 002403 | Palmer, Lauren | 0.90 | 315.00 | 283.50 |
| | | 42.60 | | \$22,233.60 |
| Subtotal Fees | | | | \$22,233.60 |
| Discount | | | | 0.00 |
| Total Fees | | | | 22,233.60 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

| |
|--|
| expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10 |
|--|

Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|-------------------|-------------------|-------------------|-------------|--------------|------|-------|------------|------------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 9,494.55 | 9,494.55 | 0.00 | 0.00 | 0.00 | 0.00 | 741,770.55 | 741,770.55 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Billed | 97,483.05 | 97,483.05 | 0.00 | 0.00 | 0.00 | 0.00 | 622,994.85 | 622,994.85 | 0.00 |
| Collected | 97,483.05 | 97,483.05 | 0.00 | 0.00 | 0.00 | 0.00 | 622,994.85 | 622,994.85 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WIP | 118,775.70 | 118,775.70 | 0.00 | | | | | | |
| Balance | | | | | | | | | |
| AR Balance | 0.00 | 0.00 | 0.00 | | | | | | |
| Unalloc | 0.00 | | | | | | | | |
| Payment | | | | | | | | | |

03/10/22 00:22:39 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

03/10/22 00:22:41 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: 11/17/21 Matter Name: SEC v. Champion-Cain - Claims & Distribu
 Proforma Number: 1149833
 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 | |
|------------|---------|--|---------------------|-------|--------|----------|--------|--------|----|
| 04/01/21 | 8403102 | Evaluate TriCopr, D Street petition to remove liens, draft/email with counsel (.6). | Zaro, David | 0.60 | 483.30 | 483.30 | WO | HD | TR |
| 04/05/21 | 8407197 | Follow-up on the petition to release lien and assess the lis pendens, status of the action. | Zaro, David | 0.40 | 322.20 | 805.50 | WO | HD | TR |
| 04/07/21 | 8405057 | Analyze and address inquiry from investor re: transfer/assignment of claim against receivership estate | Fates, Edward (Ted) | 0.40 | 244.80 | 1,050.30 | WO | HD | TR |
| 04/07/21 | 8408724 | Several emails and follow-up with counsel related to the TriGuild and Noroguchi matter. | Zaro, David | 0.40 | 322.20 | 1,372.50 | WO | HD | TR |
| 04/08/21 | 8408780 | Several emails/follow-up on the mechanic's lien petition, call with counsel regarding same. | Zaro, David | 0.20 | 161.10 | 1,533.60 | WO | HD | TR |
| 04/13/21 | 8409315 | Analyze communications from counsel for J. Lance, advise Receiver re: same (.2) respond to counsel for J. Lance (.1) | Fates, Edward (Ted) | 0.30 | 183.60 | 1,717.20 | WO | HD | TR |

03/10/22 00:22:41 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | | |
|------------|---------|---|---------------------|-------|----------|----------|--------|--------|----|-------|
| 04/14/21 | 8413369 | Several emails with TriCorp as to the Norogachi release, petition and service. | Zaro, David | 0.30 | 241.65 | 1,958.85 | WO | HD | TR | _____ |
| 04/15/21 | 8412278 | Analyze legal arguments and claims asserted by J. Lance | Fates, Edward (Ted) | 0.60 | 367.20 | 2,326.05 | WO | HD | TR | _____ |
| 04/19/21 | 8415846 | Communications with Receiver re: issues with J. Lance claims (.2) communications with counsel for J. Lance re: same (.1) | Fates, Edward (Ted) | 0.30 | 183.60 | 2,509.65 | WO | HD | TR | _____ |
| 04/26/21 | 8422133 | Advise Receiver re: responses to specific investor inquiries | Fates, Edward (Ted) | 0.20 | 122.40 | 2,632.05 | WO | HD | TR | _____ |
| 04/28/21 | 8424470 | Analyze data/info from Receiver relating to J. Lance claims and San Rafael properties (.4) calls with Receiver, J. Lance and counsel for J. Lance re: same (1.1) advise Receiver re: federal payroll tax claim and city occupancy tax claim issues (.3) | Fates, Edward (Ted) | 1.80 | 1,101.60 | 3,733.65 | WO | HD | TR | _____ |
| 04/29/21 | 8427440 | Analyze accounting issues relating to J. Lance claims and advise Receiver re: same | Fates, Edward (Ted) | 0.30 | 183.60 | 3,917.25 | WO | HD | TR | _____ |
| 05/04/21 | 8434069 | Analyze and discuss accounting related to J. Lance claims with Receiver | Fates, Edward (Ted) | 0.40 | 244.80 | 4,162.05 | WO | HD | TR | _____ |
| 05/06/21 | 8435511 | Analyze claim procedures, claim forms, notices, etc. and initial work on motion to approve procedures for administration of claims (.8) discuss same and claim forms/process with Receiver (.3) | Fates, Edward (Ted) | 1.10 | 673.20 | 4,835.25 | WO | HD | TR | _____ |
| 05/07/21 | 8436922 | Call with counsel for investor re: issues concerning Atherton settlement (.4) work on motion for approval of claim procedures | Fates, Edward (Ted) | 2.10 | 1,285.20 | 6,120.45 | WO | HD | TR | _____ |

03/10/22 00:22:41 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 (1.4) communications with counsel for mechanic's lien holder re: 301 D Street (.3) | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 05/10/21 | 8439665 | Analyze revised summary of accounting related to 809 San Rafael and J. Lance claims (.4) discuss same with Receiver (.2) discuss motion re: claims procedures with Receiver (.2) work on motion for approval of claims procedures (1.8) respond to inquiry from investor (.2) | Fates, Edward (Ted) | 2.80 | 1,713.60 | 7,834.05 | WO | HD | TR | _____ |
| 05/10/21 | 8439850 | Emails/review of the TriCorp dismissal and hearing on the petition for release. | Zaro, David | 0.40 | 322.20 | 8,156.25 | WO | HD | TR | _____ |
| 05/11/21 | 8439326 | Work on analysis of J. Lance settlement issues and letter to counsel for J. Lance re: same (1.1) discuss claim procedures with Receiver (.2) work on motion for approval of same (1.6) discuss settlement issues/letter to J. Lance with Receiver (.2) | Fates, Edward (Ted) | 3.10 | 1,897.20 | 10,053.45 | WO | HD | TR | _____ |
| 05/11/21 | 8441056 | Several emails, address the TriCorp/Norogachi hearing. | Zaro, David | 0.30 | 241.65 | 10,295.10 | WO | HD | TR | _____ |
| 05/12/21 | 8440526 | Revise and finalize settlement correspondence to counsel for J. Lance re: disputed claims | Fates, Edward (Ted) | 0.60 | 367.20 | 10,662.30 | WO | HD | TR | _____ |
| 05/13/21 | 8442142 | Work on motion for approval of claim procedures | Fates, Edward (Ted) | 0.90 | 550.80 | 11,213.10 | WO | HD | TR | _____ |
| 05/18/21 | 8450360 | Call related to the claims allowance motion and follow-up email as to claim allowance issues. | Zaro, David | 0.40 | 322.20 | 11,535.30 | WO | HD | TR | _____ |

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | | |
|------------|---------|---|---------------------|-------|----------|-----------|--------|--------|----|-------|
| 05/19/21 | 8447541 | Analyze issues re: claim procedures and draft claim forms/notices to be sent to investors and creditors (.6) communications with J. Lance re: claim issues (.2) analyze issues for 5/20 call with J. Lance (.3) | Fates, Edward (Ted) | 1.10 | 673.20 | 12,208.50 | WO | HD | TR | _____ |
| 05/19/21 | 8450405 | Work on revisions to the draft of the Receiver's motion to establish the claims procedure (1.2). Call/email with Receiver counsel as to claims process motion (.4). | Zaro, David | 1.60 | 1,288.80 | 13,497.30 | WO | HD | TR | _____ |
| 05/20/21 | 8448897 | Revisions to motion re: approval of claim procedures (.6) call with J. Lance re: claims and settlement issues (.5) | Fates, Edward (Ted) | 1.10 | 673.20 | 14,170.50 | WO | HD | TR | _____ |
| 05/20/21 | 8450726 | Call/email with regard to motion/points and authorities related to the draft, assess approach to form. | Zaro, David | 0.40 | 322.20 | 14,492.70 | WO | HD | TR | _____ |
| 05/21/21 | 8450454 | Communications with Receiver re: draft motion for approval of claim procedures | Fates, Edward (Ted) | 0.20 | 122.40 | 14,615.10 | WO | HD | TR | _____ |
| 05/24/21 | 8453695 | Email with counsel concerning the CTC/joint settlement motion. | Zaro, David | 0.40 | 322.20 | 14,937.30 | WO | HD | TR | _____ |
| 05/25/21 | 8453963 | Discuss review of claim procedures motion and preparation of notices and claim forms with Receiver | Fates, Edward (Ted) | 0.30 | 183.60 | 15,120.90 | WO | HD | TR | _____ |
| 05/26/21 | 8455052 | Discuss revisions to claim procedures motion with Receiver (.6) work on revisions to motion (1.7) meet and confer communications with SEC counsel (.2) | Fates, Edward (Ted) | 2.50 | 1,530.00 | 16,650.90 | WO | HD | TR | _____ |
| 05/26/21 | 8457973 | Emails/evaluate the drafts of the motion to approve claims process and proposed | Zaro, David | 0.60 | 483.30 | 17,134.20 | WO | HD | TR | _____ |

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|--|---------------------|-------|----------|-----------|---------------|----|----|-------|
| | | revisions to several drafts. | | | | | | | | |
| 05/27/21 | 8456572 | Discuss further revisions to claim procedures motion with Receiver (.3) work on same (.4) | Fates, Edward (Ted) | 0.70 | 428.40 | 17,562.60 | WO | HD | TR | _____ |
| 06/01/21 | 8491962 | Revisions to proposed claims notice/instructions, claim forms, and cover letters for claim procedures motion (1.7) discuss same with Receiver (.6) | Fates, Edward (Ted) | 2.30 | 1,407.60 | 18,970.20 | WO | HD | TR | _____ |
| 06/02/21 | 8482809 | Revisions to claim procedures motion, claim instructions, notices, and proof of claim forms (1.2) discuss same with Receiver (.3) work on notice of motion and proposed order (.3) | Fates, Edward (Ted) | 1.80 | 1,101.60 | 20,071.80 | WO | HD | TR | _____ |
| 06/03/21 | 8465621 | Call with court clerk re: hearing date for claim procedures motion (.1) revise and finalize motion and exhibits (.4) | Fates, Edward (Ted) | 0.50 | 306.00 | 20,377.80 | WO | HD | TR | _____ |
| 06/04/21 | 8466518 | Review scheduling order re: claim procedures motion and advise Receiver re: same (.2) communications with W. Caldarelli re: claim calculation/rising tide issue (.4) analyze and discuss same with Receiver (.5) | Fates, Edward (Ted) | 1.10 | 673.20 | 21,051.00 | WO | HD | TR | _____ |
| 06/04/21 | 8470971 | Review of the Order from the Court, follow-up on the claims motion with Receiver/counsel. | Zaro, David | 0.40 | 322.20 | 21,373.20 | WO | HD | TR | _____ |
| 06/05/21 | 8467614 | Analyze settlement counteroffer from J. Lance re: disputed claims and advise Receiver re: same | Fates, Edward (Ted) | 0.40 | 244.80 | 21,618.00 | WO | HD | TR | _____ |

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|-------------------|--------------|--|---------------------|--------------|-------------|------------|---------------|---------------|----|
| 06/07/21 | 8482824 | Communications with counsel for CalPrivate Bank re: claim procedures motion | Fates, Edward (Ted) | 0.30 | 183.60 | 21,801.60 | WO | HD | TR |
| 06/08/21 | 8483214 | Discuss J. Lance claim/settlement issues with Receiver (.3) prepare settlement counteroffer to J. Lance re: same (.4) work on settlement agreement (1.6) address inquiry from investor re: calculation of net loss (.2) discuss same with Receiver (.1) call with counsel for CalPrivate re: claim procedures motion (.4) analyze issues re: CTC settlement with investor Schwan and proposed joint motion relating to same (.5) discuss same with Receiver (.2) | Fates, Edward (Ted) | 3.70 | 2,264.40 | 24,066.00 | WO | HD | TR |
| 06/09/21 | 8491652 | Revisions to J. Lance draft settlement agreement (.8) discuss same with Receiver (.4) communications with J. Lance re: same (.1) discuss issues with CTC settlement payments and investor claim notices with Receiver (.2) communications with counsel for CTC re: same (.3) call with investor and Receiver re: questions concerning net loss accounting (.3) discuss joint motion re: Schwan settlement with Receiver and counsel (.7) | Fates, Edward (Ted) | 2.80 | 1,713.60 | 25,779.60 | WO | HD | TR |
| 06/10/21 | 8472138 | Communications with counsel for CTC re: Schwan settlement and joint motion related to same | Fates, Edward (Ted) | 0.20 | 122.40 | 25,902.00 | WO | HD | TR |
| 06/11/21 | 8483224 | Communications with counsel for CTC re: Schwan settlement and joint motion (.1) analyze comments to settlement agreement from J. Lance (.3) discuss same with | Fates, Edward (Ted) | 0.60 | 367.20 | 26,269.20 | WO | HD | TR |

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

| Trans Date | Index | Description of Service Rendered Receiver (.2) | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 06/14/21 | 8487435 | Communications with J. Lance re: revisions to draft settlement agreement and execution of same (.4) work on revisions (.3) work on motion for approval of settlement agreement (1.9) communications with Receiver re: same (.3) call with counsel for CTC re: joint motion relating to CTC/Schwan settlement (.5) discuss same and plan for 6/15 settlement conference with Receiver (.4) | Fates, Edward (Ted) | 3.80 | 2,325.60 | 28,594.80 | WO | HD | TR | _____ |
| 06/15/21 | 8482152 | Work on Receiver declaration in support of motion for approval of Lance settlement (.7) meet and confer communications with SEC counsel re: settlement motion (.2) | Fates, Edward (Ted) | 0.90 | 550.80 | 29,145.60 | WO | HD | TR | _____ |
| 06/16/21 | 8477921 | Discuss investor claim/accounting issues for L. Cocco and K. Wishingrad with Receiver (.3) call with SEC counsel re: motion to approve J. Lance settlement (.2) | Fates, Edward (Ted) | 0.50 | 306.00 | 29,451.60 | WO | HD | TR | _____ |
| 06/17/21 | 8487447 | Communications with Judge Goddard re: CTC/Schwan settlement issues and joint motion re: same (.3) discuss same with Receiver (.1) call with Court re: hearing date for Lance settlement motion (.1) finalize settlement motion papers (.3) | Fates, Edward (Ted) | 0.80 | 489.60 | 29,941.20 | WO | HD | TR | _____ |
| 06/18/21 | 8487540 | Respond to inquiry from investor re: claims process and distributions | Fates, Edward (Ted) | 0.30 | 183.60 | 30,124.80 | WO | HD | TR | _____ |
| 06/24/21 | 8490771 | Respond to investor inquiries re: claims process and timing | Fates, Edward (Ted) | 0.30 | 183.60 | 30,308.40 | WO | HD | TR | _____ |

03/10/22 00:22:41 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 |
|------------|---------|--|---------------------|-------|--------|-----------|--------|--------|
| 06/29/21 | 8489998 | Follow up communications with counsel for CTC re: schedule of settlement payments for investor claim notices (.2) communications with counsel for J. Cohen/M. Farish re: claim issues (.4) | Fates, Edward (Ted) | 0.60 | 367.20 | 30,675.60 | WO | HD TR |

Proforma Summary

| Timekeeper Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|-------|--------|-------------|
| 000313 | Zaro, David | 6.40 | 805.50 | 5,155.20 |
| 001665 | Fates, Edward (Ted) | 41.70 | 612.00 | 25,520.40 |
| | | 48.10 | | \$30,675.60 |
| Subtotal Fees | | | | \$30,675.60 |
| Discount | | | | 0.00 |
| Total Fees | | | | 30,675.60 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|--------------|------------|-----------|-------|--------------|-----------|-------|------------|------------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 72,795.60 | 72,795.60 | 0.00 | 32,436.90 | 32,436.90 | 0.00 | 472,113.45 | 472,113.45 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Billed | 31,809.15 | 31,809.15 | 0.00 | 0.00 | 0.00 | 0.00 | 278,775.90 | 278,775.90 | 0.00 |

03/10/22 00:22:41 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

| | | | | | | | | | |
|---------------------|-------------------|-------------------|--------------|------|------|------|------------|------------|------|
| Collected | 31,809.15 | 31,809.15 | 0.00 | 0.00 | 0.00 | 0.00 | 278,775.90 | 278,775.90 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Total | Fees | Costs | | | | | | |
| WIP | 193,337.55 | 193,337.55 | 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

03/10/22 00:22:44 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigation)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 378827.00008 Client Name: Krista Freitag, as Receiver for ANI Deve
 Date of Last Billing: 11/17/21 Matter Name: SEC v. Champion-Cain - Pending Litigation
 Proforma Number: 1149833
 Client/Matter Joint Group # 378827-1 Client Matter Number:

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|------------|---------|---|---------------------|-------|----------|----------|--------|--------|----|
| 04/06/21 | 8403734 | Communications with Receiver and local counsel in FL re: strategy and timing for SunTrust motions and trial date | Fates, Edward (Ted) | 0.40 | 244.80 | 244.80 | WO | HD | TR |
| 06/22/21 | 8490766 | Communications with local counsel in FL re: Westlink v. SunTrust case | Fates, Edward (Ted) | 0.40 | 244.80 | 489.60 | WO | HD | TR |
| 06/24/21 | 8485905 | Analyze issues and deadlines in FL action against SunTrust (.3) call/emails with local counsel in Florida re: case strategy, evidentiary issues, trial preparation, and settlement strategy (1.4) | Fates, Edward (Ted) | 1.70 | 1,040.40 | 1,530.00 | WO | HD | TR |
| 06/28/21 | 8490359 | Communications with local counsel in FL re: evidentiary support for damage claims and hearing on motion to strike (.4) analyze breakdown of damage claims (.5) discuss same with Receiver (.2) | Fates, Edward (Ted) | 1.10 | 673.20 | 2,203.20 | WO | HD | TR |
| 06/30/21 | 8491655 | Observe court hearing and confer with local counsel in FL re: motion to strike, motion to seek punitive damages, case strategy, evidentiary issues and mediation/settlement | Fates, Edward (Ted) | 2.30 | 1,407.60 | 3,610.80 | WO | HD | TR |

03/10/22 00:22:44 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigation)

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

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action |
|------------|-------|---|------------|-------|------|-----|---------------|
| | | approach (.9) review ANI/Westlink documents from local counsel related to ANI/Westlink damage claims (1.1) communications with Receiver re: same (.3) | | | | | |

Proforma Summary

| Timekeeper Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|-------|--------|------------|
| 001665 | Fates, Edward (Ted) | 5.90 | 612.00 | 3,610.80 |
| | | 5.90 | | \$3,610.80 |
| Subtotal Fees | | | | \$3,610.80 |
| Discount | | | | 0.00 |
| Total Fees | | | | 3,610.80 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10

Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|--------------|------------|-----------|-------|--------------|--------|-------|-----------|-----------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 21,235.50 | 21,235.50 | 0.00 | 386.10 | 386.10 | 0.00 | 57,997.80 | 57,997.80 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Billed | 1,958.40 | 1,958.40 | 0.00 | 0.00 | 0.00 | 0.00 | 30,278.25 | 30,278.25 | 0.00 |
| Collected | 1,958.40 | 1,958.40 | 0.00 | 0.00 | 0.00 | 0.00 | 30,278.25 | 30,278.25 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

03/10/22 00:22:44 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

| | | | |
|---------------------|------------------|------------------|--------------|
| WIP | Total | Fees | Costs |
| Balance | 27,719.55 | 27,719.55 | 0.00 |
| 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

03/10/22 00:22:46 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: 11/17/21 Matter Name: SEC v. Champion-Cain - Employment/Fees
 Proforma Number: 1149833
 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 | |
|------------|---------|--|---------------------|-------|--------|----------|--------|--------|----|
| 04/08/21 | 8405676 | Review orders approving interim fee applications and allowing portion thereof to be filed under seal, advise Receiver re: same | Fates, Edward (Ted) | 0.20 | 122.40 | 122.40 | WO | HD | TR |
| 05/17/21 | 8444636 | Revisions to Receiver's 4th interim fee application | Fates, Edward (Ted) | 0.80 | 489.60 | 612.00 | WO | HD | TR |
| 05/19/21 | 8447435 | Discuss revisions to 4th interim fee application with Receiver (.1) meet and confer with SEC counsel re: fee applications (.2) | Fates, Edward (Ted) | 0.30 | 183.60 | 795.60 | WO | HD | TR |
| 05/28/21 | 8459816 | Revise and finalize Receiver's 4th fee application, notice and proposed order (.4) communications with Receiver re: same (.1) | Fates, Edward (Ted) | 0.50 | 306.00 | 1,101.60 | WO | HD | TR |

Proforma Summary

| Timekeeper Number | Timekeeper | Hours | Rate | Amounts |
|-------------------|---------------------|-------|--------|------------|
| 001665 | Fates, Edward (Ted) | 1.80 | 612.00 | 1,101.60 |
| | | 1.80 | | \$1,101.60 |

03/10/22 00:22:46 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 |
|--------|---------------------|-------|------|------------|
| | Subtotal Fees | | | \$1,101.60 |
| | Discount | | | 0.00 |
| | Total Fees | | | 1,101.60 |
| | Total Disbursements | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

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| expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .10 |
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Account Summary – As Of 03/10/22

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|---------------------|-----------------|-----------------|-------------|--------------|----------|-------|----------|----------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 3,281.85 | 3,281.85 | 0.00 | 1,093.95 | 1,093.95 | 0.00 | 9,931.05 | 9,931.05 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Billed | 1,836.00 | 1,836.00 | 0.00 | 0.00 | 0.00 | 0.00 | 4,568.40 | 4,568.40 | 0.00 |
| Collected | 1,836.00 | 1,836.00 | 0.00 | 0.00 | 0.00 | 0.00 | 4,568.40 | 4,568.40 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WIP | 5,362.65 | 5,362.65 | 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.

03/10/22 00:22:46 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

E3 Advisors
401 West 'A' Street, Suite 1830
San Diego, CA 92101
