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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

**SIXTH 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: March 28, 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 Sixth Interim Application for Payment of Fees and Reimbursement of  
 6 Expenses (the "Application"). This Application covers the period from January 1,  
 7 2021 through March 31, 2021 (the "Application Period"), and seeks approval of  
 8 \$331,077.15 in fees and \$22,087.42 in expenses, and an order authorizing the  
 9 Receiver to pay, on an interim basis, 80% of the fees incurred (\$264,861.72) and  
 10 100% of the expenses incurred (\$22,087.42).

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 Seventh Interim Report and Recommendations ("Seventh Report") filed on May 27, 2021 (Dkt. 671), which describes in detail the Receiver's activities during the Application Period.

This Application seeks approval of \$331,077.15 in fees for a total of 537.60 hours worked, and payment on an interim basis of 80% of that amount, or \$264,861.72. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**<sup>1</sup> and is broken down into the following categories:

Category	Hours	Amount
General Receivership	7.80	\$4,773.60
Asset Investigation & Recovery	86.30	\$48,023.55
Reporting	14.50	\$9,976.95
Operations & Asset Sales	63.90	\$32,379.30
Claims & Distributions	106.80	\$74,281.95
Third Party Recoveries	201.20	\$127,880.55
Pending Litigation	2.80	\$1,713.6
Employment/Professional Fees	1.60	\$979.20
General Clawback Claims & Settlements	37.50	\$20,701.80
Claims Against Kim Peterson et al.	15.20	\$10,366.65
<b>Total Fees</b>	<b>537.60</b>	<b>\$331,077.15</b>

<sup>1</sup> 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 communicated with counsel for the Commission and counsel for GCC regarding a bifurcated settlement of the claims against GCC in this action. Finally, Allen Matkins advised the Receiver regarding certain tax issues regarding the Receivership Entities. The reasonable and necessary fees for Allen Matkins' work in this category total \$4,773.60.

#### **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;

- 1 • Issuing demand and asset turnover letters to recipients believed to be in
- 2 possession of receivership assets in order to enable the Receiver to
- 3 recover and gain control over the assets;
- 4 • Gathering, organizing, and reviewing documents and information
- 5 obtained from third parties;
- 6 • Analyzing investor loans and associated documentation.

7 Allen Matkins also assisted the Receiver in establishing a centralized database  
8 or "repository" of ANI documents and information that the Receiver has provided  
9 (through a series of productions) to Chicago Title Company ("CTC"),  
10 investors/lenders, and other third parties in lieu of responding to multiple subpoenas  
11 and document requests in related litigation matters. The joint motion to approve the  
12 proposed repository, allocation of costs, and protective order was approved by the  
13 Court on June 26, 2020. Dkt. 355.

14 During the Application Period, Allen Matkins worked with the Receiver and  
15 the e-discovery vendor to organize, process, label, and produce a very large volume  
16 of electronic data. The source files at issue include hundreds of thousands of  
17 documents and electronic records stored at various locations, servers, hard drives  
18 and cloud storage, as well as documents produced to the Receiver by numerous third  
19 parties pursuant to subpoenas issued by the Receiver.

20 Although significant time was spent to establish the ANI document  
21 repository, as well as to meet and confer with the interested parties, this work  
22 already has (and will continue to) save the receivership estate significant costs of  
23 having to respond to numerous individual document requests involving hundreds of  
24 thousands of documents and electronic records in the various litigation matters  
25 arising from the ANI Ponzi scheme.

26 Allen Matkins also assisted the Receiver in addressing the various issues  
27 associated with the property owned by Defendant Gina Champion-Cain and her  
28 husband Steven Cain located at 4014 Bandini Street, including secured debts on the

1 property and the receivership estate's claims to recover ANI funds used for the down  
2 payment and to pay down prior loans on the property. These property was  
3 refinanced pursuant to the Joint Motion filed on November 9, 2020, and order  
4 approving it (Dkt. 499, 506.), pursuant to which the receivership estate recovered  
5 \$1.3 million. The refinance transaction closed and payment was received during the  
6 Application Period.

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

11 Finally, Allen Matkins has assisted the Receiver in analyzing the receivership  
12 estate's rights and interests under certain insurance policies, including preparing a  
13 claim against ANI's crime/theft insurance policy based on the guilty pleas entered  
14 by Defendant Gina Champion-Cain and former ANI employee Cris Torres in the  
15 related criminal cases. The reasonable and necessary fees for Allen Matkins' work  
16 in this category total \$48,023.55.

### 17 3. Reporting.

18 Allen Matkins' services in this category include assisting in preparing the  
19 Receiver's Sixth Interim Report and Recommendations, which was filed on  
20 March 12, 2021. Dkt. 619. The 18-page report includes a detailed summary of the  
21 Receiver's activities, funds recovered, real and personal property assets, restaurant  
22 and retail operations, property taxes, insurance, debt service, loans and other  
23 investments, investigation of third party claims, pending litigation, and other  
24 matters. The report also details the receipts and disbursements for the receivership  
25 estate since the Receiver's appointment and provides her recommendations for the  
26 continued administration of the receivership.

27 Allen Matkins also assisted in preparing the Receiver's Updated Investor-  
28 Specific Forensic Accounting and Report, which was filed at the Court's direction



1 on March 31, 2021. Dkt. 630. The reasonable and necessary fees for Allen  
2 Matkins' work in this category total \$9,976.95.

3 4. Operations & Asset Sales.

4 Allen Matkins' significant work in this category reflects the volume and  
5 complexity of legal issues that arose during the Application Period in connection  
6 with the preservation, operation and sale of assets and the various businesses owned  
7 and operated by the Receivership Entities, including but not limited to restaurants,  
8 cafes, apartments, construction projects, leased properties, and other receivership  
9 properties. In summary, work within this category included the following:

- 10 • Drafting purchase and sale agreements, commercial and residential  
11 leases and lease amendments, where necessary and appropriate, for  
12 various receivership businesses and properties, as well as handling  
13 related title, loan, and contract issues;
- 14 • Assisting with closing documents for real property sales, and with  
15 escrow agreements and related documents relating to sales of liquor  
16 licenses associated with closed restaurants;
- 17 • Preparing motions, declarations, proposed orders, and notices regarding  
18 non-receipt of overbids (as applicable) for Court approval of sales of  
19 the following: 3816 Mission Boulevard, the West Washington property,  
20 812 San Rafael property, Valle Vista property, Yarmouth Court  
21 property, Camino Degrazia property, 3792 Mission Blvd. property, and  
22 West Washington property; and
- 23 • Advising on issues related to COVID-19 pandemic and Safer-At-Home  
24 Orders, including required modifications to business operations and  
25 notices to remaining ANI employees.

26 The reasonable and necessary fees for Allen Matkins' work in this category  
27 total \$32,379.30.

1                   5.     Claims & Distributions.

2             Services rendered in this category generally relate to the claims and interests  
3 of investors and creditors of the Receivership Entities. Allen Matkins assisted with  
4 issues related to disseminating information about the receivership to investors and  
5 creditors, including information provided on the receivership website  
6 ([www.anireceivership.com](http://www.anireceivership.com)). The firm also assisted in responding to direct inquiries  
7 from investors and creditors.

8             Allen Matkins assisted the Receiver in analyzing proposed joint motions  
9 relating to the treatment of claims of investors who settle their claims with Chicago  
10 Title, along with the terms of the settlement agreements and the potential effect such  
11 settlements would have on the receivership estate and the interests of non-settling  
12 investors. Allen Matkins communicated with counsel for the applicable investor  
13 groups and counsel for Chicago Title, including explaining the Receiver's concerns  
14 with certain proposed assignments of investor claims to Chicago Title in connection  
15 with the settlements. After Chicago Title disregarded the Receiver's concerns and  
16 filed a motion for approval of the settlements (Dkt. 607), Allen Matkins advised the  
17 Receiver on the applicable legal issues and assisted in preparing an opposition to  
18 Chicago Title's motion (Dkt. 621). Ultimately, after several mediation sessions with  
19 Judge Goddard, the assignments were effectively removed from the investor  
20 settlements with Chicago Title and the settlements were approved without them.  
21 Dkt. 682.

22             Allen Matkins assisted the Receiver in addressing the claims and mechanic's  
23 liens asserted by the lender, the City of West Sacramento, the general contractor and  
24 various subcontractors, respectively, associated with the partially constructed  
25 apartment building located at 301 D Street in West Sacramento. The firm also  
26 assisted in analyzing and addressing issues with various liens and claims asserted by  
27 vendors, contractors, government agencies and former employees, including tax  
28

1 claims and wage claims. The reasonable and necessary fees for Allen Matkins'  
2 work in this category total \$74,281.95.

3           6.     Third Party Recoveries.

4           This portion of the Application pertains to work on potential claims against  
5 third parties to recover amounts for the benefit of the receivership estate. Due to the  
6 confidential nature of the legal work on these matters and the Receiver's litigation  
7 strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith  
8 to file this portion of the Application under seal. The reasonable and necessary fees  
9 for Allen Matkins' work in this category total \$127,880.55.

10           7.     Pending Litigation.

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

19           Allen Matkins also assisted with issues relating to the action pending in San  
20 Diego Superior Court known as *Luu v. The Patio Restaurant Grp., LLC, et al.*, San  
21 Diego Super. Ct. Case No. 37-2019-00015451-CU-OE-CTL, which is a putative  
22 class action filed by a former employee (which action is now stayed pursuant to the  
23 litigation stay in the Appointment Order). The reasonable and necessary fees for  
24 Allen Matkins' work in this category total \$1,713.60.

25           8.     Employment/Professional Fees

26           Although fee applications are a necessary component of federal equity  
27 receiverships, neither the Receiver nor her professionals charge for time spent  
28 preparing their own detailed applications. Allen Matkins assisted in preparing the

Receiver's Third Interim Fee Application and with meet and confer communications with counsel for the Commission. The fee applications were filed on January 13, 2021 (Dkt. 569, 570) and approved on April 7, 2021. Dkt. 637, 638. The reasonable and necessary fees for Allen Matkins' work in this category total \$979.20.

9. General Clawback Claims & Settlements.

This portion of the Application pertains to work on potential clawback claims and settlements against third parties to recover amounts for the benefit of the receivership estate. Due to the confidential nature of the legal work on these matters and the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith to file this portion of the Application under seal. The reasonable and necessary fees for Allen Matkins' work in this category total \$20,701.80.

10. Claims Against Kim Peterson.

This portion of the Application pertains to work on claims against Kim Peterson and his entities to recover amounts for the benefit of the receivership estate. Due to the confidential nature of the legal work on these matters and the Receiver's litigation strategy vis-à-vis third parties, the Receiver has filed a motion concurrently herewith to file this portion of the Application under seal. The reasonable and necessary fees for Allen Matkins' work in this category total \$10,366.65.

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

Allen Matkins requests that the Court approve reimbursement of \$22,087.42 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	Total
Mediation Fees	\$2,750.00
Deposition Transcript Fees	\$9,176.00
Messenger/FedEx Fees	\$90.33
Service of Process	\$465.20
Court/Filing Fees	\$476.31
Duplication	\$26.60
Postage	\$2.04
PACER/Document Research	\$86.50
E-Discovery	\$8,514.44
Investigative Service	\$500.00
<b>Total</b>	<b>\$22,087.42</b>

**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).

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

### **III. CONCLUSION.**

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

1. Approving Allen Matkins' fees of \$331,077.15;
2. Authorizing and directing the Receiver to pay 80% of approved fees, or \$264,861.72, from the assets of the Receivership Entities;
3. Approving Allen Matkins' costs in the amount of \$22,087.42, and authorizing and directing the Receiver to reimburse such costs in full; and
4. For such other and further relief as the Court deems appropriate.

Dated: February 16, 2022

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

By: s/Edward G. Fates

DAVID R. ZARO  
EDWARD G. FATES  
MATTHEW D. PHAM  
Attorneys for Receiver  
KRISTA FREITAG

**EXHIBIT INDEX**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>PAGE NO.</b>
Exhibit A	Detailed Descriptions of Services Rendered	17



# EXHIBIT A

# EXHIBIT A

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11/18/21 13:59:19 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

Proforma Number: 1123434

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

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/04/21	8309184	Call with Receiver and AUSA re: issues relating to Champion-Cain sentencing (.6) Call with counsel for Champion-Cain re: issues relating to Champion-Cain sentencing and statement re: cooperation (.5) advise Receiver re: same and work on short draft statement (.8)	Fates, Edward (Ted)	1.90	1,162.80	1,162.80	WO	HD	TR	_____
01/05/21	8311631	Communications with Receiver and counsel for Champion-Cain re: request for statement re: cooperation (.5) work on revisions to draft statement (.3)	Fates, Edward (Ted)	0.80	489.60	1,652.40	WO	HD	TR	_____
01/06/21	8312366	Communications with Receiver and counsel for Champion-Cain re: draft statement re: cooperation	Fates, Edward (Ted)	0.30	183.60	1,836.00	WO	HD	TR	_____
01/07/21	8313327	Communications with Receiver and counsel for Champion-Cain re: revisions to statement re: cooperation	Fates, Edward (Ted)	0.30	183.60	2,019.60	WO	HD	TR	_____
01/12/21	8316769	Communications with Receiver and counsel for Ovation re: continuance of Champion-	Fates, Edward (Ted)	0.20	122.40	2,142.00	WO	HD	TR	_____

11/18/21 13:59:19 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Description of Service Rendered Cain sentencing	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/22/21	8326299	Communications with counsel for Champion-Cain re: bifurcated settlement with SEC and motion to withdraw.	Fates, Edward (Ted)	0.20	122.40	2,264.40	WO	HD	TR _____
01/27/21	8329998	Review Champion-Cain consent to entry of judgment and proposed judgment and advise Receiver re: same	Fates, Edward (Ted)	0.40	244.80	2,509.20	WO	HD	TR _____
01/28/21	8331118	Review motion to withdraw by counsel for Champion-Cain, advise Receiver re: same	Fates, Edward (Ted)	0.20	122.40	2,631.60	WO	HD	TR _____
02/03/21	8339911	Discuss tax return preparation work for receivership entities/affiliates and associated costs with Receiver and advise on strategy and next steps (.3) review order permitting Receiver to object to Champion-Cain consent judgment, advise Receiver re: same (.2) communications with Champion-Cain re: same (.2)	Fates, Edward (Ted)	0.70	428.40	3,060.00	WO	HD	TR _____
02/05/21	8342881	Advise Receiver re: response to media inquiry relating to Champion-Cain settlement with SEC	Fates, Edward (Ted)	0.10	61.20	3,121.20	WO	HD	TR _____
02/15/21	8359512	Communications with Champion-Cain and SEC counsel re: Champion-Cain proposed ex parte application to file electronically pro se	Fates, Edward (Ted)	0.30	183.60	3,304.80	WO	HD	TR _____
02/16/21	8358705	Communications with counsel for Champion-Cain re: change of firms and continuance of sentencing hearing date (.2) analyze and advise Receiver re: pre-receivership tax issues and returns (.4)	Fates, Edward (Ted)	0.60	367.20	3,672.00	WO	HD	TR _____

11/18/21 13:59:19 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
02/23/21	8359511	Analyze pre-receivership tax return issues, FTB fees, and issues re: dissolution of non-operating entities in receivership (.6) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.90	550.80	4,222.80	WO	HD	TR	_____
03/22/21	8386435	Communications with counsel for Champion-Cain re: sentencing hearing	Fates, Edward (Ted)	0.20	122.40	4,345.20	WO	HD	TR	_____
03/24/21	8388555	Communications with Receiver re: criminal sentence issued to C. Torres	Fates, Edward (Ted)	0.20	122.40	4,467.60	WO	HD	TR	_____
03/29/21	8393456	Call with AUSA regarding Champion-Cain sentencing and investor loss accounting (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	306.00	4,773.60	WO	HD	TR	_____

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

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Trans Date	Index	Type	Quantity	Amt	Circle Action			
01/01/21	2688891	EDISC – CS Disco, Inc. - Monthly Hosting for January 2021	0.00	2,340.03	WO	HD	TR	_____
01/01/21	2688919	EDISC – CS Disco, Inc. - Project & Data Management Fees for December 2020	0.00	3,737.50	WO	HD	TR	_____
01/04/21	2686545	DEPO – Ott Reporting, Inc. - Deposition Transcript of Motion Hearing Taken 12/17/2020	0.00	60.30	WO	HD	TR	_____
01/07/21	2687540	BW – Duplication - Black & White Copies	5.00	0.50	WO	HD	TR	_____
01/07/21	2687543	BW – Duplication - Black & White Copies	4.00	0.40	WO	HD	TR	_____
01/07/21	2689228	MSNGR – Federal Express - Ship To: Marisol Nagata	0.00	13.34	WO	HD	TR	_____
01/07/21	2689942	EDISC – CourtCall, LLC - Telephonic Appearance for San Diego Superior Court, Judge Ronald L. Styn	0.00	94.00	WO	HD	TR	_____

11/18/21 13:59:19 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)**

<b>Trans Date</b>	<b>Index</b>	<b>Type</b>	<b>Quantity</b>	<b>Amt</b>				
01/08/21	2689530	COURT – -San Diego Superior Court,Obtain copy of documents from Court's website.	0.00	2.00	WO	HD	TR	_____
01/13/21	2688136	BW – Duplication - Black & White Copies	94.00	9.40	WO	HD	TR	_____
01/15/21	2689776	DCSRCH – First Legal Network, LLC - USDC - San Diego, Obtain a Cerfitted Copy of Order	0.00	35.00	WO	HD	TR	_____
01/15/21	2689777	MSNGR – First Legal Network, LLC - CORINTHIAN TITLE; ORDER	0.00	19.62	WO	HD	TR	_____
01/20/21	2689534	COURT – -San Diego Superior Court,Obtain copies of Minute Orders from Court's docket.	0.00	15.20	WO	HD	TR	_____
01/20/21	2696600	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	168.30	WO	HD	TR	_____
01/20/21	2696601	POS – Process of Service - Nationwide Legal LLC - SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	54.30	WO	HD	TR	_____
01/22/21	2693401	COURT – -Orange County Superior Court,Obtain copies of documents from Orange County Superior Court regarding claims case against Chicago Title.	0.00	24.81	WO	HD	TR	_____
01/25/21	2689678	DEPO – Veritext, LLC - Deposition Transcript of Marco Costales Taken 01/22/2021	0.00	1,618.00	WO	HD	TR	_____
02/05/21	2693682	DEPO – Veritext, LLC - Deposition Transcript of Renee Marshall Taken 02/02/2021	0.00	1,868.30	WO	HD	TR	_____
02/10/21	2701797	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	0.30	WO	HD	TR	_____
02/10/21	2701798	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	40.50	WO	HD	TR	_____
02/10/21	2701799	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	0.50	WO	HD	TR	_____
02/10/21	2701800	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	0.40	WO	HD	TR	_____

11/18/21 13:59:19 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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

Trans Date	Index	Type	Quantity	Amt					
02/10/21	2701801	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	3.50	WO	HD	TR	_____	
02/10/21	2701802	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	6.30	WO	HD	TR	_____	
02/12/21	2694230	DEPO – Veritext, LLC - Deposition Transcript of Joanne Marie Reynolds Taken 02/05/2021	0.00	1,605.45	WO	HD	TR	_____	
02/12/21	2694948	POS – Nationwide Legal, LLC - First Republic Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	188.30	WO	HD	TR	_____	
02/12/21	2694949	POS – Nationwide Legal, LLC - Western Alliance Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	54.30	WO	HD	TR	_____	
02/26/21	2696405	BW – Duplication - Black & White Copies	1.00	0.10	WO	HD	TR	_____	
02/26/21	2696406	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____	
03/01/21	2698568	COURT – -Orange County Superior Court,Obtain a copy of investor lawsuit filed against Chicago Title.	0.00	7.50	WO	HD	TR	_____	
03/01/21	2700468	EDISC – CS Disco, Inc. - Monthly Hosting for March 2021	0.00	2,342.91	WO	HD	TR	_____	
03/01/21	2702339	POST – Postage	0.00	0.51	WO	HD	TR	_____	
03/02/21	2698003	BW – Duplication - Black & White Copies	17.00	1.70	WO	HD	TR	_____	
03/02/21	2698004	COLOR – Duplication - Color Copies	7.00	0.70	WO	HD	TR	_____	
03/02/21	2698471	MSNGR – Federal Express - Ship To:	0.00	23.49	WO	HD	TR	_____	
03/03/21	2702344	POST – Postage	0.00	1.53	WO	HD	TR	_____	
03/03/21	2703962	INV – JF Zimmerman & Associates - Locate & Asset	0.00	500.00	WO	HD	TR	_____	

11/18/21 13:59:19 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				
03/05/21	2705644	Investigation for Randolph Houts MEDIT – Judicate West - Mediation Fee - 03/05/2021	0.00	2,750.00	WO	HD	TR	_____
03/08/21	2699339	MSNGR – Federal Express - Ship To: Ms Amy Gutierrez, Escrow Offi	0.00	20.11	WO	HD	TR	_____
03/09/21	2698799	BW – Duplication - Black & White Copies	77.00	7.70	WO	HD	TR	_____
03/10/21	2699948	MSNGR – Federal Express - Ship To: Tracey Huntington	0.00	13.77	WO	HD	TR	_____
03/15/21	2700393	COURT – -San Diego Superior Court,Obtain copies of various pleadings from lawsuits against Chicago Title.	0.00	71.20	WO	HD	TR	_____
03/15/21	2700394	COURT – -San Diego Superior Court,Obtain copies of various pleadings from lawsuits against Chicago Title.	0.00	299.00	WO	HD	TR	_____
03/15/21	2700395	COURT – -San Diego Superior Court,Obtain copies of various pleadings from lawsuits against Chicago Title.	0.00	16.20	WO	HD	TR	_____
03/19/21	2700398	COURT – -San Diego Superior Court,Obtain copy of Minute Order from investor cases.	0.00	2.00	WO	HD	TR	_____
03/22/21	2700339	BW – Duplication - Black & White Copies	25.00	2.50	WO	HD	TR	_____
03/25/21	2703689	DEPO – - Veritext, LLC - Deposition Transcript of Steve Cusato Taken on 03/12/2021	0.00	2,435.90	WO	HD	TR	_____
03/26/21	2704307	COURT – -San Diego Superior Court,Obtain copy of Order from Court's docket in investor lawsuit.	0.00	5.80	WO	HD	TR	_____
03/26/21	2704308	COURT – -San Diego Superior Court,Obtain copies of Minute Orders from Court's docket in investor lawsuit.	0.00	6.00	WO	HD	TR	_____
03/26/21	2704309	COURT – -San Diego Superior Court,Obtain copy of Amended Complaint from Court's docket in investor lawsuit.	0.00	26.60	WO	HD	TR	_____
03/30/21	2701881	BW – Duplication - Black & White Copies	34.00	3.40	WO	HD	TR	_____
03/30/21	2703688	DEPO – Veritext, LLC - Deposition Transcript of Adrienne Helvie Taken on 03/19/2021	0.00	1,588.05	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
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11/18/21 13:59:19 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

### Proforma Summary

#### Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	7.80	612.00	4,773.60
		7.80		\$4,773.60
Subtotal Fees				\$4,773.60
Discount				0.00
Total Fees				4,773.60
Total Disbursements				22,087.42

### 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 11/18/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,829.75	1,543.05	286.70	29,138.47	7,051.05	22,087.42	164,765.82	65,314.80	99,451.02
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	60,505.06	2,983.50	57,521.56	55,998.90	55,998.90	77,363.60
Collected	60,505.06	2,983.50	57,521.56	60,505.06	2,983.50	57,521.56	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
<b>WIP</b>	<b>192,313.25</b>	<b>9,315.45</b>	<b>182,997.80</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									



11/18/21 13:59:19 PROFORMA STATEMENT FOR MATTER 378827.00002 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - General Receivers)

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**Billing Address**

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

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11/18/21 13:59:21 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: 1123434

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/04/21	8337909	Attention to review and transmit subpoena productions (1.1).	Aspis, Norman	1.10	490.05	490.05	WO	HD	TR
01/05/21	8310291	Follow up communications with counsel for S. Cain and counsel for Champion-Cain re: status of Bandini transaction	Fates, Edward (Ted)	0.20	122.40	612.45	WO	HD	TR
01/05/21	8327760	Analysis and exchange of e-mails re: data production issues and timing.	Farrell, Michael	0.30	221.40	833.85	WO	HD	TR
01/05/21	8337861	Draft and revise letter to M. Nagata regarding Merit Financial production and confer with counsel regarding the same (1.3); attention to outstanding subpoena issues (.5).	Aspis, Norman	1.80	801.90	1,635.75	WO	HD	TR
01/06/21	8312066	Revisions to meet and confer letter to Merit/Awerbuch re: subpoenas and document production (.6) advise on issues re: tracking on repository-related e-discovery costs (.2) analyze issues re: outstanding subpoenas for K. Peterson	Fates, Edward (Ted)	1.80	1,101.60	2,737.35	WO	HD	TR

11/18/21 13:59:21 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			
		related account records (.3) analyze confidentiality and privacy concerns raised by counsel for K. Peterson regarding outstanding subpoenas for bank records (.4) call with Receiver re: issues with outstanding bank subpoenas (.3)								
01/06/21	8315162	Finalize and transmit meet-and-confer letter to M. Nagata regarding Merit Financial and I. Awerbuch production and confer with counsel regarding the same (1.1); attention to issues in connection with outstanding subpoenas, including conferring with counsel and K. Freitag regarding the same (.5); review records produced by Merit Financial and I. Awerbuch (1.2).	Aspis, Norman	2.80	1,247.40	3,984.75	WO	HD	TR	_____
01/06/21	8327799	Preparation for and participation in conference call re: data production issues and strategy.	Farrell, Michael	0.50	369.00	4,353.75	WO	HD	TR	_____
01/07/21	8315151	Prepare supplemental letter to Wells Fargo regarding production and transmit the same (.3).	Aspis, Norman	0.30	133.65	4,487.40	WO	HD	TR	_____
01/07/21	8315152	Confer with M. Nagata regarding document productions from Merit Financial and I. Awerbuch (.2); review productions from the same (.9).	Aspis, Norman	1.10	490.05	4,977.45	WO	HD	TR	_____
01/07/21	8315859	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.80	241.20	5,218.65	WO	HD	TR	_____
01/07/21	8316261	attention to review of incoming third-party productions	Neglia, Ross	0.60	180.90	5,399.55	WO	HD	TR	_____

11/18/21 13:59:21 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			
01/08/21	8314226	Analyze and advise on Merit/Awerbuch document production issues	Fates, Edward (Ted)	0.10	61.20	5,460.75	WO	HD	TR	_____
01/08/21	8315144	Confer with counsel regarding Tricorp litigation and review relevant pleadings (.3).	Aspis, Norman	0.30	133.65	5,594.40	WO	HD	TR	_____
01/11/21	8315241	Advise on next steps re: review/analysis of Merit/Awerbuch document production (.2) communications with counsel for S. Cain (.1)	Fates, Edward (Ted)	0.30	183.60	5,778.00	WO	HD	TR	_____
01/11/21	8321333	identify relevant third-party productions for attorney review	Neglia, Ross	0.60	180.90	5,958.90	WO	HD	TR	_____
01/12/21	8316773	Communications with counsel for S. Cain re: Bandini transaction (.4) advise Receiver re: same (.2) communications with counsel for K. Peterson re: subpoenas for bank records and exchange of information with CTC (.3) analyze and advise on e-discovery vendor costs for ANI document repository (.2)	Fates, Edward (Ted)	1.10	673.20	6,632.10	WO	HD	TR	_____
01/12/21	8330681	Analysis and review of various e-mails re: data review work and timing/cost issues.	Farrell, Michael	0.30	221.40	6,853.50	WO	HD	TR	_____
01/12/21	8336972	Review records produced by Merit Financial and I. Awerbuch (1.4).	Aspis, Norman	1.40	623.70	7,477.20	WO	HD	TR	_____
01/13/21	8317713	Further communications with counsel for S. Cain re: status/issues with Bandini transaction (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	367.20	7,844.40	WO	HD	TR	_____

11/18/21 13:59:21 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)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
01/13/21	8331421	Analysis and review of e-mails re: data and cost issues.	Farrell, Michael	0.30	221.40	8,065.80	WO	HD	TR	_____
01/14/21	8318894	Call/emails with counsel for S. Cain and counsel for Champion-Cain re: title and escrow issues for Bandini transaction (.6) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.70	428.40	8,494.20	WO	HD	TR	_____
01/14/21	8327054	Attention to issues in connection with outstanding subpoenas (.4).	Aspis, Norman	0.40	178.20	8,672.40	WO	HD	TR	_____
01/14/21	8333447	Review, analysis and exchange of e-mails re: data review issues and costs.	Farrell, Michael	0.20	147.60	8,820.00	WO	HD	TR	_____
01/15/21	8333472	Review and analysis of prior correspondence re: open data issues and exchanged e-mails re: same.	Farrell, Michael	0.70	516.60	9,336.60	WO	HD	TR	_____
01/18/21	8322119	Address issues production of documents by Merit/Awerbuch and analysis of same (.3) analyze summary of facts and legal issues re: Merit/Awerbuch (.9) revisions to summary (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	2.10	1,285.20	10,621.80	WO	HD	TR	_____
01/18/21	8325410	Call with counsel to address the issues related to the accounting/coordination of accounting records and outstanding subpoenas.	Zaro, David	0.20	161.10	10,782.90	WO	HD	TR	_____
01/18/21	8325415	Assess status of Hiscox claim, email to Hiscox related to the insurance claim.	Zaro, David	0.40	322.20	11,105.10	WO	HD	TR	_____
01/19/21	8321860	Communications with counsel for S. Cain re: joint escrow instructions for Bandini transaction	Fates, Edward (Ted)	0.20	122.40	11,227.50	WO	HD	TR	_____

11/18/21 13:59:21 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			
01/19/21	8322437	Teleconference with D. Zaro regarding settlement and asset recovery issue (0.2).	Del Castillo, Joshua	0.20	122.40	11,349.90	WO	HD	TR	_____
01/19/21	8326671	Attention to issues in connection with production from Merit Financial and I. Awerbuch, and confer with counsel regarding the same (1.4).	Aspis, Norman	1.40	623.70	11,973.60	WO	HD	TR	_____
01/19/21	8327252	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	90.45	12,064.05	WO	HD	TR	_____
01/19/21	8333501	Review and analysis of memorandum re: Google Vault issues and analysis re: integration into global correspondence.	Farrell, Michael	0.30	221.40	12,285.45	WO	HD	TR	_____
01/20/21	8323134	Address issues re: remaining ANI repository data and cost allocation (.2) discuss additional subpoenas for bank records with Receiver (.3) advise on preparing and issuing same (.2) review/analyze Bandini-related documents from title company and counsel for S. Cain (.8) communications with counsel for S. Cain re: same (.6)	Fates, Edward (Ted)	2.10	1,285.20	13,570.65	WO	HD	TR	_____
01/20/21	8326644	Attention to preparation and service of subpoenas on Wells Fargo and Western Alliance Bank, and service on counsel (1); confer with M. Nagata and S. Metzger regarding outstanding issues (.3); review production from Wells Fargo and transmit the same to K. Freitag (.6).	Aspis, Norman	1.90	846.45	14,417.10	WO	HD	TR	_____
01/21/21	8324204	Calls/emails with counsel for S. Cain and title company re: escrow and title issues for	Fates, Edward (Ted)	3.10	1,897.20	16,314.30	WO	HD	TR	_____

11/18/21 13:59:21 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	
		Bandini transaction (.7) revisions to draft escrow instructions (1.6) discuss same with Receiver (.4) analyze repository and forensic computer charges for outside vendor, discuss same with Receiver (.4)							
01/21/21	8326636	Attention to correspondence in connection with recently served subpoenas (.6); review records produced by Merit Financial and I. Awerbuch (.4).	Aspis, Norman	1.00	445.50	16,759.80	WO	HD	TR
01/21/21	8334080	Analysis and review of e-mails re: status of data review and strategy going forward.	Farrell, Michael	0.30	221.40	16,981.20	WO	HD	TR
01/22/21	8325315	Discuss bank subpoenas and document production issues with Receiver (.2); communications with counsel for Levin group and Receiver re: repository cost issues (.1).	Fates, Edward (Ted)	0.30	183.60	17,164.80	WO	HD	TR
01/22/21	8326611	Attention to issues in connection with outstanding subpoenas, and teleconference with representative from Wells Fargo regarding the same (.5).	Aspis, Norman	0.50	222.75	17,387.55	WO	HD	TR
01/25/21	8327837	Communications with counsel for S. Cain and title company re: issues with liens on Bandini property	Fates, Edward (Ted)	0.60	367.20	17,754.75	WO	HD	TR
01/25/21	8335801	Review remaining documents produced by Merit Financial and I. Awerbuch (.9).	Aspis, Norman	0.90	400.95	18,155.70	WO	HD	TR
01/26/21	8329622	Advise Receiver re: forensic data work and associated charges by outside vendor (.2) address ANI repository data and timing/cost issues re: same (.3) discuss same with	Fates, Edward (Ted)	0.70	428.40	18,584.10	WO	HD	TR

11/18/21 13:59:21 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 Receiver (.2)	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/26/21	8334166	Review and analysis of e-mails and attached documents re: consultant's work on data review and analysis re: issues raised by same.	Farrell, Michael	0.30	221.40	18,805.50	WO	HD	TR _____
01/27/21	8331070	Review Peterson-related subpoenas and confer with counsel regarding the same (.4); review production from Western Alliance Bank (.2).	Aspis, Norman	0.60	267.30	19,072.80	WO	HD	TR _____
01/27/21	8335342	Telephone conference, analysis and exchange of e-mails re: strategy to address additional data issues.	Farrell, Michael	0.50	369.00	19,441.80	WO	HD	TR _____
01/27/21	8335969	identify relevant Kim Peterson data for attorney review	Neglia, Ross	0.80	241.20	19,683.00	WO	HD	TR _____
01/28/21	8330387	Discuss issues re: Endeavor Bank shares with Receiver (.2) communications with Receiver and counsel for S. Cain re: steps to complete Bandini transaction (.4) prepare draft language for S. Cain confirming declaration (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	795.60	20,478.60	WO	HD	TR _____
01/28/21	8332174	Review productions related to Peterson accounts and prepare spreadsheet and production to Peterson's counsel (1.6).	Aspis, Norman	1.60	712.80	21,191.40	WO	HD	TR _____
01/28/21	8333600	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	21,492.90	WO	HD	TR _____



11/18/21 13:59:21 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		
01/29/21	8333601	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	21,794.40	WO	HD	TR	_____
01/29/21	8334722	Review records not relating to Peterson produced after July 24, 2020 and compile list of the same and arrange production of the same (1.1).	Aspis, Norman	1.10	490.05	22,284.45	WO	HD	TR	_____
02/01/21	8343050	Review supplemental production from Wells Fargo (.5).	Aspis, Norman	0.50	222.75	22,507.20	WO	HD	TR	_____
02/01/21	8358561	Respond to inquiry from counsel for CalPrivate Bank re: repository documents (.2) analyze and revise escrow instructions, instructions letters to Wells Fargo and Schwab, and language for S. Cain declaration (1.4) discuss same with Receiver (.2) communications with counsel for S. Cain and counsel for Champion-Cain re: same (.3)	Fates, Edward (Ted)	2.10	1,285.20	23,792.40	WO	HD	TR	_____
02/02/21	8338646	Communications with counsel for S. Cain re: revisions to joint escrow instructions for Bandini transaction	Fates, Edward (Ted)	0.20	122.40	23,914.80	WO	HD	TR	_____
02/02/21	8341433	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	2.00	603.00	24,517.80	WO	HD	TR	_____
02/02/21	8343060	Review issues relating to production to Chicago Title and confer with S. Peng regarding the same (.5).	Aspis, Norman	0.50	222.75	24,740.55	WO	HD	TR	_____
02/02/21	8350117	Evaluate the insurance coverage letter from Hiscox and email as to Torres crime	Zaro, David	0.60	483.30	25,223.85	WO	HD	TR	_____

11/18/21 13:59:21 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	
		insurance claims.							
02/03/21	8339471	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	301.50	25,525.35	WO	HD	TR _____
02/03/21	8339906	Advise on issues and next steps for ANI repository data, discuss same with Receiver (.3) advise on issues relating to Hiscox insurance claim (.3) analyze title issues and revisions to joint escrow instructions for Bandini transaction (.3) discuss same with Receiver (.2) communications with counsel for S. Cain re: same (.2)	Fates, Edward (Ted)	1.30	795.60	26,320.95	WO	HD	TR _____
02/03/21	8340048	Evaluate the insurance coverage letter from Hiscox and email as to Torres crime insurance claim.	Zaro, David	0.60	483.30	26,804.25	WO	HD	TR _____
02/03/21	8342674	Review document productions from Wells Fargo and coordinate with S. Peng regarding transmittal (.7).	Aspis, Norman	0.70	311.85	27,116.10	WO	HD	TR _____
02/04/21	8342615	Confer with S. Peng regarding supplemental production to Chicago Title and transmit the same (.6).	Aspis, Norman	0.60	267.30	27,383.40	WO	HD	TR _____
02/04/21	8358559	Advise on additional document subpoenas/productions of bank records for forensic accounting	Fates, Edward (Ted)	0.40	244.80	27,628.20	WO	HD	TR _____
02/05/21	8342588	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	90.45	27,718.65	WO	HD	TR _____

11/18/21 13:59:21 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		
02/05/21	8342630	Review Peterson production and transmit the same to K. Freitag (.3).	Aspis, Norman	0.30	133.65	27,852.30	WO	HD	TR	_____
02/05/21	8344717	Research on statute of limitations/clam discovery and issues arising out of the insurer's claim denial (1.1). Call with Receiver related to Hiscox matter and letter response (.2). Call with counsel to address the insurance coverage issues (.3).	Zaro, David	1.60	1,288.80	29,141.10	WO	HD	TR	_____
02/05/21	8358565	Communications with counsel for S. Cain re: final escrow closing instructions letter for Bandini transaction (.4) review/execute same (.2)	Fates, Edward (Ted)	0.60	367.20	29,508.30	WO	HD	TR	_____
02/08/21	8344000	Communications with counsel for S. Cain and SEC counsel re: Bandini-related documents (.3) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.40	244.80	29,753.10	WO	HD	TR	_____
02/09/21	8348381	Analysis of the Houts matter, the legal malpractice issues and letter/emails.	Zaro, David	0.60	483.30	30,236.40	WO	HD	TR	_____
02/09/21	8348885	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	90.45	30,326.85	WO	HD	TR	_____
02/09/21	8349678	Confer with S. Peng regarding Peterson records and transmit the same to L. Ryan (.2).	Aspis, Norman	0.20	89.10	30,415.95	WO	HD	TR	_____
02/10/21	8346070	Analyze revised letters for release of frozen funds to escrow for Bandini transaction (.4) communications with counsel for S. Cain re: same (.2)	Fates, Edward (Ted)	0.60	367.20	30,783.15	WO	HD	TR	_____

11/18/21 13:59:21 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)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>	
02/10/21	8348386	Evaluate Houts memorandum/letter and emails, then emails with counsel as to the Houts matter/strategy (.5). Email/call to address the settlement/mediation prospects/approach to insurance/policy limits (.3).	Zaro, David	0.80	644.40	31,427.55	WO	HD	TR
02/11/21	8347233	Communications with parties to Bandini transaction re: execution of instruction letters to financial institutions (.4) review documentation from Receiver re: potential CD at Texas Capital Bank (.3) advise on additional bank subpoenas, discuss same with Receiver (.4)	Fates, Edward (Ted)	1.10	673.20	32,100.75	WO	HD	TR
02/12/21	8349690	Prepare and serve subpoenas for Peterson-related records (.4).	Aspis, Norman	0.40	178.20	32,278.95	WO	HD	TR
02/16/21	8350718	Call with Receiver re: content/plan for forensic accounting report and outline for same	Fates, Edward (Ted)	0.90	550.80	32,829.75	WO	HD	TR
02/16/21	8366491	Attention to issues in connection with outstanding subpoenas (.5).	Aspis, Norman	0.50	222.75	33,052.50	WO	HD	TR
02/17/21	8351710	Discuss issues re: ANI repository-related costs and storage of data	Fates, Edward (Ted)	0.20	122.40	33,174.90	WO	HD	TR
02/19/21	8356133	Follow-up on the issues related to the Hiscox claim, and research insurance coverage (.6).	Zaro, David	0.60	483.30	33,658.20	WO	HD	TR
02/22/21	8358660	Work on evaluation and research related to insurance coverage issues and assess strategy.	Zaro, David	0.80	644.40	34,302.60	WO	HD	TR

11/18/21 13:59:21 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		
02/22/21	8366277	Attention to issues in connection with outstanding subpoenas and prepare document subpoena for investor records (.5).	Aspis, Norman	0.50	222.75	34,525.35	WO	HD	TR	_____
02/23/21	8358707	Research/analysis of legal coverage issues as to Hiscox (1.1). Draft letter response to Hiscox Insurance denial of coverage (1.2).	Zaro, David	2.30	1,852.65	36,378.00	WO	HD	TR	_____
02/23/21	8366148	Review subpoena production from First Republic Bank (.4); attention to document production issues (.1).	Aspis, Norman	0.50	222.75	36,600.75	WO	HD	TR	_____
02/24/21	8358990	Analyze and advise on coverage issues and strategy re: claim under Hiscox crime policy	Fates, Edward (Ted)	0.40	244.80	36,845.55	WO	HD	TR	_____
02/24/21	8364407	Revise draft of letter demand of Hixcox criminal insurance claim (1.2). Several calls as to the Hiscox claims/finalize letter, follow-up emails regarding same (.7).	Zaro, David	1.90	1,530.45	38,376.00	WO	HD	TR	_____
02/24/21	8364423	Email/analysis of the closing issues related to the corporate entities and tax issues (.5). Several conferences with counsel related to the tax and dissolution issues (.2).	Zaro, David	0.70	563.85	38,939.85	WO	HD	TR	_____
02/25/21	8359723	Communications with Receiver and counsel for S. Cain re: lien issues relating to Bandini refinance transaction	Fates, Edward (Ted)	0.50	306.00	39,245.85	WO	HD	TR	_____
02/25/21	8365686	Prepare and serve multiple subpoenas for investor records and confer with counsel regarding the same (1.2); attention to issues in connection with outstanding subpoenas (.3).	Aspis, Norman	1.50	668.25	39,914.10	WO	HD	TR	_____

11/18/21 13:59:21 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)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>	
02/26/21	8363864	Communications with Receiver and counsel for S. Cain re: revised instruction re: unfreezing and transfer of funds to escrow for Bandini transaction	Fates, Edward (Ted)	0.40	244.80	40,158.90	WO	HD	TR
02/26/21	8365564	Attention to issues in connection with outstanding subpoenas and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	178.20	40,337.10	WO	HD	TR
02/26/21	8365692	Analysis and determination of client documents in preparation for attorney review.	Peng, Simona	0.10	30.15	40,367.25	WO	HD	TR
03/01/21	8389919	Communications with Receiver, counsel for S. Cain and escrow company re: wire instructions, tax lien, and Bandini closing issues	Fates, Edward (Ted)	0.80	489.60	40,856.85	WO	HD	TR
03/02/21	8389923	Communications with counsel for S. Cain and First Choice Bank re: Bandini payoff demand	Fates, Edward (Ted)	0.30	183.60	41,040.45	WO	HD	TR
03/03/21	8376905	Attention to outstanding subpoenas (.3).	Aspis, Norman	0.30	133.65	41,174.10	WO	HD	TR
03/05/21	8370506	Communications with Receiver and counsel for S. Cain re: tax lien issues re: Bandini closing	Fates, Edward (Ted)	0.40	244.80	41,418.90	WO	HD	TR
03/08/21	8371992	Communications with Receiver and counsel for First Choice Bank re: recovery of loan deposit funds in connection with Bandini closing	Fates, Edward (Ted)	0.60	367.20	41,786.10	WO	HD	TR
03/12/21	8378788	Attention to issues in connection with outstanding subpoenas (.2).	Aspis, Norman	0.20	89.10	41,875.20	WO	HD	TR

11/18/21 13:59:21 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	
03/18/21	8389838	Call with Receiver and G. Rodriguez re: remaining ANI data preservation and storage issues (.4) communications with counsel for Ovation/Banc of California re: account records for accounting (.2)	Fates, Edward (Ted)	0.60	367.20	42,242.40	WO	HD	TR
03/19/21	8390019	Communications with Receiver and counsel for S. Cain re: status/timing of Bandini closing	Fates, Edward (Ted)	0.30	183.60	42,426.00	WO	HD	TR
03/23/21	8389766	Communications with Receiver, counsel for S. Cain, and escrow re: Bandini closing issues (.4) discuss loan repayment plan with H. Rossi and agreement re: same with Receiver (.4)	Fates, Edward (Ted)	0.80	489.60	42,915.60	WO	HD	TR
03/23/21	8400453	Revise subpoena list and confer with client and counsel regarding the same (.5).	Aspis, Norman	0.50	222.75	43,138.35	WO	HD	TR
03/24/21	8388558	Work on loan repayment agreement for outstanding loan to H. Rossi	Fates, Edward (Ted)	1.40	856.80	43,995.15	WO	HD	TR
03/24/21	8390656	Draft and revise subpoenas to various investors (.5).	Aspis, Norman	0.50	222.75	44,217.90	WO	HD	TR
03/24/21	8391291	Emails/call related to the judgment/sentencing of Mr. Torres and follow-up as to Hiscox claim.	Zaro, David	0.40	322.20	44,540.10	WO	HD	TR
03/26/21	8392165	Prepare and revise subpoenas to investors (.5); confer with First Republic Bank and Western Alliance Bank regarding productions (.8); review and transmit First Republic Bank production (.3).	Aspis, Norman	1.60	712.80	45,252.90	WO	HD	TR

11/18/21 13:59:21 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

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


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<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
03/30/21	8397399	Several calls with Receiver and review of Receiver report to assist Receiver with narrative (.5). Emails/call with counsel related to the CalPrivate Bank records and follow-up on the accounting (.7). Analysis/follow-up on the accounting information and address the AUSA subpoena docs, the bank record (1.0).	Zaro, David	2.20	1,772.10	47,025.00	WO	HD	TR	_____
03/30/21	8397963	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.80	241.20	47,266.20	WO	HD	TR	_____
03/30/21	8399664	Review and revise subpoenas to various investors, finalize and serve the same (.5); correspond with CalPrivate Bank's counsel regarding missing statements and confer internally regarding the same (1.2).	Aspis, Norman	1.70	757.35	48,023.55	WO	HD	TR	_____

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**Proforma Summary**


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<b>Timekeeper</b>				
<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000313	Zaro, David	13.70	805.50	11,035.35
000739	Farrell, Michael	3.70	738.00	2,730.60
001665	Fates, Edward (Ted)	29.50	612.00	18,054.00
001842	Del Castillo, Joshua	0.20	612.00	122.40
002307	Peng, Simona	7.60	301.50	2,291.40
002369	Aspis, Norman	29.60	445.50	13,186.80
002448	Neglia, Ross	2.00	301.50	603.00
		<u>86.30</u>		<u>\$48,023.55</u>
Subtotal Fees				\$48,023.55
Discount				0.00
Total Fees				48,023.55
Total Disbursements				0.00



11/18/21 13:59:21 PROFORMA STATEMENT FOR MATTER 378827.00003 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Asset Investigati)

### 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 11/18/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	44,321.40	44,321.40	0.00	114,245.10	114,245.10	0.00	505,531.60	496,403.10	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	159,221.41	150,092.91	9,128.50	301,311.90	301,311.90	9,128.50
Collected	114,574.32	114,574.32	0.00	159,221.41	150,092.91	9,128.50	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
<b>WIP</b>	<b>273,530.65</b>	<b>190,822.05</b>	<b>82,708.60</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

### Billing Address

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

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11/18/21 13:59:23 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: 1123434

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	TR	Circle Action
02/12/21	8353488	Evaluate outline of forensic accounting and asset report, assess the issues as to scope and supporting narrative.	Zaro, David	0.60	483.30	483.30	WO	HD	TR	_____
02/15/21	8354423	Evaluate issues/call regarding accounting and evaluate narrative approach.	Zaro, David	0.30	241.65	724.95	WO	HD	TR	_____
02/16/21	8354486	Evaluate the outline, prepare for the meeting, attend meeting with the Receiver/counsel as to accounting/taxes and forensic.	Zaro, David	1.30	1,047.15	1,772.10	WO	HD	TR	_____
03/08/21	8375403	Several emails related to the Receiver report.	Zaro, David	0.30	241.65	2,013.75	WO	HD	TR	_____
03/08/21	8389956	Communications with Receiver re: preparation of 6th interim report	Fates, Edward (Ted)	0.30	183.60	2,197.35	WO	HD	TR	_____
03/09/21	8373693	Work on Receiver's 6th interim report (1.8) discuss revisions to same with Receiver (.5)	Fates, Edward (Ted)	2.30	1,407.60	3,604.95	WO	HD	TR	_____

11/18/21 13:59:23 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		
03/10/21	8374692	Revisions to 6th interim report and exhibits (.6) meet and confer communications with SEC counsel re: same (.2)	Fates, Edward (Ted)	0.80	489.60	4,094.55	WO	HD	TR	_____
03/12/21	8377037	Update and finalize 6th interim report and exhibits (.5) communications with Receiver re: same (.2)	Fates, Edward (Ted)	0.70	428.40	4,522.95	WO	HD	TR	_____
03/18/21	8389839	Discuss forensic accounting issues and report re: same with Receiver	Fates, Edward (Ted)	0.70	428.40	4,951.35	WO	HD	TR	_____
03/22/21	8390020	Work on updated draft investor-specific accounting report (.9) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.20	734.40	5,685.75	WO	HD	TR	_____
03/23/21	8389767	Discuss approach to remaining investor accounting issues and report re: same with Receiver	Fates, Edward (Ted)	0.50	306.00	5,991.75	WO	HD	TR	_____
03/25/21	8389836	Meet and confer with SEC counsel re: update to investor accounting report (.2) advise Receiver re: same (.1) discuss revised investor accounting report and issues/approach to same with Receiver (.5) initial work on analyzing updates to list of represented investors (.3)	Fates, Edward (Ted)	1.10	673.20	6,664.95	WO	HD	TR	_____
03/25/21	8393187	Email/call with counsel related to the Receiver's forensic accounting and address the scope/remaining issues.	Zaro, David	0.40	322.20	6,987.15	WO	HD	TR	_____
03/28/21	8392061	Analyze/revise updated investor accounting report (.9) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.20	734.40	7,721.55	WO	HD	TR	_____
03/28/21	8393230	Conference with Receiver concerning the draft accounting report, Kim Peterson	Zaro, David	1.40	1,127.70	8,849.25	WO	HD	TR	_____

11/18/21 13:59:23 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
		issues and update as to investor losses (.3). Email/follow-up to evaluate, revise the draft report of the receiver as to losses (1.1).						
03/29/21	8395322	Conference with Receiver related to the Receiver accounting report and revisions to same (.4). Email with counsel related to the report/hearing on criminal sentencing (.2).	Zaro, David	0.60	483.30	9,332.55	WO	HD TR
03/31/21	8399822	Several emails and review/revise draft of Receiver report, advice as to the upcoming hearing (.6). Follow-up email with Receiver and counsel related to accounting (.2).	Zaro, David	0.80	644.40	9,976.95	WO	HD TR

**Proforma Summary****Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.70	805.50	4,591.35
001665	Fates, Edward (Ted)	8.80	612.00	5,385.60
		14.50		\$9,976.95
Subtotal Fees				\$9,976.95
Discount				0.00
Total Fees				9,976.95
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
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11/18/21 13:59:23 PROFORMA STATEMENT FOR MATTER 378827.00004 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Reporting)

**Account Summary – As Of 11/18/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,559.05	3,559.05	0.00	28,325.25	28,325.25	0.00	75,430.35	75,430.35	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	5,895.00	5,895.00	0.00	40,552.65	40,552.65	0.00
Collected	2,509.20	2,509.20	0.00	5,895.00	5,895.00	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
<b>WIP</b>	<b>34,877.70</b>	<b>34,877.70</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

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11/18/21 13:59:24 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: 1123434

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/04/21	8307935	Revisions to notice of auction results and amended proposed order for W. Washington sale motion	Fates, Edward (Ted)	0.40	244.80	244.80	WO	HD	TR
01/08/21	8313968	Review due diligence issues related to Surf Rider Ocean Beach property.	Lorenzen, Jonathan	0.60	326.70	571.50	WO	HD	TR
01/12/21	8316925	Advise Receiver re: order approving W. Washington sale and sale closing issues (.3) review request from buyer re: assignment of purchase and sale agreement to affiliated entity (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	428.40	999.90	WO	HD	TR
01/15/21	8319700	Discuss issues re: W. Washington sale closing with Receiver	Fates, Edward (Ted)	0.20	122.40	1,122.30	WO	HD	TR
01/15/21	8320067	Review forms of early access to use for Surf Rider Ocean Beach.	Lorenzen, Jonathan	0.20	108.90	1,231.20	WO	HD	TR

11/18/21 13:59:24 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/19/21	8321853	Work on accountings of sale closings for Valle Vista, Camino de Grazia, Yarmouth Court, and 812 San Rafael properties (.8) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.90	550.80	1,782.00	WO	HD	TR	_____
01/19/21	8321945	Review access issues for Surf Rider Ocean Beach and prepare Early Access Agreement.	Lorenzen, Jonathan	2.60	1,415.70	3,197.70	WO	HD	TR	_____
01/21/21	8324123	Analyze proposed amendment to West Washington purchase and sale agreement, communications with G. Rodriguex re: same	Fates, Edward (Ted)	0.30	183.60	3,381.30	WO	HD	TR	_____
01/21/21	8324143	Review Amendment to Purchase and Sale Agreement for 901-915 West Washington.	Lorenzen, Jonathan	0.60	326.70	3,708.00	WO	HD	TR	_____
01/25/21	8327633	Prepare revised closing documents for Surf Rider Ocean Beach.	Lorenzen, Jonathan	0.20	108.90	3,816.90	WO	HD	TR	_____
01/26/21	8328718	Review closing issues for Surf Rider Ocean Beach.	Lorenzen, Jonathan	0.40	217.80	4,034.70	WO	HD	TR	_____
01/26/21	8328727	Analyze sale related info from G. Rodriguez and initial work on sale approval motion for 3816 Mission property	Fates, Edward (Ted)	0.70	428.40	4,463.10	WO	HD	TR	_____
01/26/21	8336984	Edit and revise the Fourth Amendment and Assignment of lease for the OB Surf Rider property; correspond with Geno Rodriguez re: such revised Fourth Amendment and Assignment.	Hawn, Megan	0.40	147.60	4,610.70	WO	HD	TR	_____
01/27/21	8329558	Work on motion for approval of sale 3816 Mission Blvd. property (1.4) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	1.60	979.20	5,589.90	WO	HD	TR	_____

11/18/21 13:59:24 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			
01/28/21	8330520	Work on revisions to 3816 Mission sale motion and Receiver declaration in support of motion (.9) discuss same with Receiver (.3) work on notice of motion and proposed order (.3)	Fates, Edward (Ted)	1.50	918.00	6,507.90	WO	HD	TR	_____
01/29/21	8333093	Review Ocean Beach Lease Assignment and Fourth Amendment before sending off for signatures.	Palmer, Lauren	0.20	63.00	6,570.90	WO	HD	TR	_____
01/29/21	8337204	Review and analyze the executed Bill of Sale and Fourth Amendment to Lease for the transaction with G Boys Holdings for the OB Surf Rider property; correspond with the client re: such documents.	Hawn, Megan	0.40	147.60	6,718.50	WO	HD	TR	_____
02/01/21	8338070	Review issues for 3816 Mission.	Lorenzen, Jonathan	0.20	108.90	6,827.40	WO	HD	TR	_____
02/01/21	8338270	Draft Steven Ozbun Overbid Purchase and Sale Agreement for 3816 Mission Blvd.	Palmer, Lauren	2.30	724.50	7,551.90	WO	HD	TR	_____
02/01/21	8363103	Edit and revise the overbid purchase and sale agreement with Steve Ozbun for the property located at 3816 Mission Boulevard.	Hawn, Megan	0.80	295.20	7,847.10	WO	HD	TR	_____
02/02/21	8339139	Review draft of Purchase and Sale Agreement for 3816 Mission.	Lorenzen, Jonathan	0.30	163.35	8,010.45	WO	HD	TR	_____
02/02/21	8363145	Review, analyze, edit and revise the overbid purchase and sale agreement with Steve Ozbun for the property located at 3816 Mission Boulevard.	Hawn, Megan	1.10	405.90	8,416.35	WO	HD	TR	_____



11/18/21 13:59:24 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)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>	
02/03/21	8340348	Review status of 3816 Mission.	Lorenzen, Jonathan	0.20	108.90	8,525.25	WO	HD	TR
02/03/21	8363162	Continue drafting, editing and revising the overbid purchase and sale agreement with Steve Ozbun for the property located at 3816 Mission Boulevard.	Hawn, Megan	0.40	147.60	8,672.85	WO	HD	TR
02/04/21	8341376	Review closing issues for Mission Beach Surf Rider.	Lorenzen, Jonathan	0.20	108.90	8,781.75	WO	HD	TR
02/04/21	8363217	Begin drafting, editing and revising the closing documents for the transaction with OMG Restaurant Group for the Surf Rider Mission Beach property.	Hawn, Megan	0.60	221.40	9,003.15	WO	HD	TR
02/05/21	8344672	Draft closing documents regarding OMG Hospitality and 2163 Abbott Street and make sure ready to be executed.	Palmer, Lauren	1.70	535.50	9,538.65	WO	HD	TR
02/08/21	8363244	Review and analyze Buyer's executed version of the overbid purchase and sale agreement with Steve Ozbun; correspond with Geno Rodriguez re: such executed overbid purchase and sale agreement.	Hawn, Megan	1.20	442.80	9,981.45	WO	HD	TR
02/09/21	8344686	Review lease status for Mission Beach Surf Rider.	Lorenzen, Jonathan	0.20	108.90	10,090.35	WO	HD	TR
02/09/21	8345024	Analyze and advise Receiver on issues re: potential sale of Endeavor Bank shares	Fates, Edward (Ted)	0.30	183.60	10,273.95	WO	HD	TR
02/09/21	8345291	Review terms of Overbid Purchase and Sale Agreement for 3816 Mission.	Lorenzen, Jonathan	0.20	108.90	10,382.85	WO	HD	TR

11/18/21 13:59:24 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		
02/09/21	8346252	Draft Overbid purchase and sale agreement for Codee Allen.	Palmer, Lauren	0.30	94.50	10,477.35	WO	HD	TR	_____
02/10/21	8345967	Communications with G. Rodriguez re: potential second overbidder for Washoe III auction	Fates, Edward (Ted)	0.20	122.40	10,599.75	WO	HD	TR	_____
02/10/21	8346073	Review closing documents for 3816 Mission.	Lorenzen, Jonathan	0.30	163.35	10,763.10	WO	HD	TR	_____
02/10/21	8363278	Review, analyze, edit and revise the closing documents for the Surf Rider Mission Beach transaction.	Hawn, Megan	1.80	664.20	11,427.30	WO	HD	TR	_____
02/11/21	8347108	Discuss plan re: potential sale of Endeavor Bank shares and advise Receiver re: same (.5) analysis issues re: re-registration of shares and account with broker (.4) review proposed brokerage account agreement (.6) advise Receiver re: ANI trademark issues (.2)	Fates, Edward (Ted)	1.70	1,040.40	12,467.70	WO	HD	TR	_____
02/12/21	8347975	Advise Receiver on Endeavor stock certificates and brokerage account issues (.4) work on review/analysis of brokerage account agreement (.3)	Fates, Edward (Ted)	0.70	428.40	12,896.10	WO	HD	TR	_____
02/12/21	8364435	Analysis of brokerage agreement with D.A. Davidson for corporate/securities issues.	Klinger, Warren	0.60	305.10	13,201.20	WO	HD	TR	_____
02/15/21	8360726	Review brokerage agreement.	Klinger, Warren	0.50	254.25	13,455.45	WO	HD	TR	_____
02/16/21	8352284	Analysis of brokerage agreement with D.A. Davidson.	Klinger, Warren	3.00	1,525.50	14,980.95	WO	HD	TR	_____

11/18/21 13:59:24 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			
02/16/21	8358702	Discuss issues re: lost certificates for Endeavor bank shares and brokerage account agreement for same with Receiver (.2) compile and send comments to account agreement to Receiver (.7)	Fates, Edward (Ted)	0.90	550.80	15,531.75	WO	HD	TR	_____
02/17/21	8351744	Advise on issues re: potential sale of 301 D Street per agreement with lender and contractor	Fates, Edward (Ted)	0.30	183.60	15,715.35	WO	HD	TR	_____
02/18/21	8352900	Review terms of overbid for 3816 Mission.	Lorenzen, Jonathan	0.20	108.90	15,824.25	WO	HD	TR	_____
02/18/21	8352970	Advise Receiver re: overbid and auction issues for 3816 Mission Blvd. property (.2) assist Receiver with lost stock certificates issues (.2)	Fates, Edward (Ted)	0.40	244.80	16,069.05	WO	HD	TR	_____
02/18/21	8353316	Draft Overbid purchase and sale agreement for Gregory Thurnher.	Palmer, Lauren	0.30	94.50	16,163.55	WO	HD	TR	_____
02/18/21	8363382	Edit and revise the overbid purchase and sale agreement with Gregory Thurnher for the property located at 3816 Mission Boulevard.	Hawn, Megan	0.60	221.40	16,384.95	WO	HD	TR	_____
02/22/21	8356411	Communications with G. Rodriguez re: overbid and auction issues for 3816 Mission Blvd (.5) work on notice re: receipt of overbid (.4)	Fates, Edward (Ted)	0.90	550.80	16,935.75	WO	HD	TR	_____
02/23/21	8357378	Communications with Receiver and G. Rodriguez re: auction issues for 3816 Mission Blvd. (.4) analyze and advise on auction instructions for bidders (.3)	Fates, Edward (Ted)	0.70	428.40	17,364.15	WO	HD	TR	_____

11/18/21 13:59:24 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			
02/24/21	8359085	Review signature authority issues for Lease for Mission Beach Surf Rider.	Lorenzen, Jonathan	0.30	163.35	17,527.50	WO	HD	TR	_____
02/24/21	8363478	Edit and revise the lease assignment and amendment related to the Surf Rider Mission Beach transaction.	Hawn, Megan	0.30	110.70	17,638.20	WO	HD	TR	_____
02/25/21	8359934	Review revisions to lease documents for Mission Beach Surf Rider; review overbid results.	Lorenzen, Jonathan	0.40	217.80	17,856.00	WO	HD	TR	_____
02/25/21	8359973	Attend auction for 3816 Mission Blvd. property (.5) discuss same and amendments to winning bid purchase and sale agreement and back up purchase and sale agreement with G. Rodriguez (.4) work on notice of results of 3816 Mission auction and amended proposed order approving sale (.7)	Fates, Edward (Ted)	1.60	979.20	18,835.20	WO	HD	TR	_____
02/25/21	8363508	Edit and revise the lease assignment and amendment related to the Surf Rider Mission Beach transaction based on the client's comments; prepare revised clean and redline versions of such assignment and amendment and correspond with the client re: the same.	Hawn, Megan	0.60	221.40	19,056.60	WO	HD	TR	_____
02/27/21	8363134	Begin drafting the highest bidder amendment to the Mauricio Schwartzman purchase and sale agreement and the back up bidder amendment to the Steve Ozbun purchase and sale agreement for the transaction relating to the property located at 3816 Mission Boulevard.	Hawn, Megan	0.80	295.20	19,351.80	WO	HD	TR	_____

11/18/21 13:59:24 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/01/21	8366825	Communications with G. Rodriguez re: sale of 140 Keller Street property (.2) analyze information re: same (.3) initial work on sale approval motion (.4)	Fates, Edward (Ted)	0.90	550.80	19,902.60	WO	HD	TR
03/02/21	8368382	Work on 140 Keller Street sale motion (1.7) discuss same, taxes, and ALC mechanic's lien issue with Receiver and G. Rodriguez (.6) advise Receiver re: approach to sale of Endeavor Bank shares (.2)	Fates, Edward (Ted)	2.50	1,530.00	21,432.60	WO	HD	TR
03/03/21	8368400	Analyze ALC mechanic's lien issues re: 140 Keller Street sale (.7) communications with Receiver and counsel for ALC re: same (.6) revisions to 140 Keller Street sale motion (.8) work on Receiver declaration, proposed order, and notice of sale motion (.9)	Fates, Edward (Ted)	3.00	1,836.00	23,268.60	WO	HD	TR
03/04/21	8369366	Revise and finalize notice of results of auction and amended proposed order for 3816 Mission Blvd sale (.4) discuss concerns re: ALC invoices/lien amount with Receiver and G. Rodriguez (.3) revise and finalize 140 Keller sale motion, Receiver declaration and proposed order (.6)	Fates, Edward (Ted)	1.30	795.60	24,064.20	WO	HD	TR
03/04/21	8369826	Review overbidder information for 140 Keller.	Lorenzen, Jonathan	0.20	108.90	24,173.10	WO	HD	TR
03/05/21	8372290	Draft Overbid Purchase and Sale Agreement - Fillmore Capital Acquisitions - 132 & 140 Keller Street.	Palmer, Lauren	1.60	504.00	24,677.10	WO	HD	TR
03/08/21	8389958	Revise and finalize 140 Keller Street sale motion, declaration and proposed order	Fates, Edward (Ted)	0.40	244.80	24,921.90	WO	HD	TR

11/18/21 13:59:24 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/09/21	8374087	Discuss trademark sale issues with Receiver (.4) advise Receiver re: order approving sale of 3816 Mission (.2) work on accountings of costs of sale for 3792 Mission and West Washington sales (.4)	Fates, Edward (Ted)	1.00	612.00	25,533.90	WO	HD	TR	_____
03/10/21	8375298	Review Overbid Purchase and Sale Agreement for 140 Keller.	Lorenzen, Jonathan	0.60	326.70	25,860.60	WO	HD	TR	_____
03/10/21	8398252	Edit and revise the overbid purchase and sale agreement with Fillmore Capital for the property located at 140 Keller Street; correspond with the client re: such draft of the agreement	Hawn, Megan	1.20	442.80	26,303.40	WO	HD	TR	_____
03/18/21	8383031	Analyze and advise G. Rodriguez on 140 Keller Street sale issues	Fates, Edward (Ted)	0.40	244.80	26,548.20	WO	HD	TR	_____
03/18/21	8390015	Discuss addendum to brokerage account agreement for sale of Endeavor Bank shares with Receiver (.3) initial work on same (.3)	Fates, Edward (Ted)	0.60	367.20	26,915.40	WO	HD	TR	_____
03/19/21	8385190	Prepare addendum to brokerage agreement.	Klinger, Warren	2.00	1,017.00	27,932.40	WO	HD	TR	_____
03/22/21	8387765	Prepare brokerage agreement addendum	Klinger, Warren	1.30	661.05	28,593.45	WO	HD	TR	_____
03/23/21	8387750	Advise Receiver and G. Rodriguez re: issues with winning bidder for 3816 Mission, deposits, and potential closing with back-up bidder	Fates, Edward (Ted)	0.80	489.60	29,083.05	WO	HD	TR	_____

11/18/21 13:59:24 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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


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<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
03/23/21	8387766	Prepare brokerage agreement addendum.	Klinger, Warren	2.70	1,372.95	30,456.00	WO	HD	TR	_____
03/25/21	8390062	Review information about overbids and related correspondence for 140 Keller Street.	Lorenzen, Jonathan	0.60	326.70	30,782.70	WO	HD	TR	_____
03/25/21	8390568	Begin drafting, editing and revising the overbid purchase and sale agreement with Ghirardo CPA for the property located at 140 Keller Street; review and analyze the executed overbid purchase and sale agreement with Fillmore Capital and correspond with the client re: such agreement.	Hawn, Megan	2.10	774.90	31,557.60	WO	HD	TR	_____
03/26/21	8398691	Review and analyze the overbid purchase and sale agreement executed by Ghirardo CPA for the property located at 140 Keller Street; prepare the final execution version of such overbid purchase and sale agreement; correspond with the client re: such agreement.	Hawn, Megan	0.90	332.10	31,889.70	WO	HD	TR	_____
03/31/21	8395952	Communications with G. Rodriguez re overbids for 140 Keller Street sale and notice re same (.3) prepare notice re: same (.2) advise G. Rodriguez re: 3816 Mission sale cancellation issues (.3)	Fates, Edward (Ted)	0.80	489.60	32,379.30	WO	HD	TR	_____

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**Proforma Summary**


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<b>Timekeeper Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001665	Fates, Edward (Ted)	25.70	612.00	15,728.40
002115	Lorenzen, Jonathan	8.50	544.50	4,628.25

11/18/21 13:59:24 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

### Proforma Summary

#### Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002283	Klinger, Warren	10.10	508.50	5,135.85
002306	Hawn, Megan	13.20	369.00	4,870.80
002403	Palmer, Lauren	6.40	315.00	2,016.00
		63.90		\$32,379.30
Subtotal Fees				\$32,379.30
Discount				0.00
Total Fees				32,379.30
Total Disbursements				0.00

### Attorney Billing Instructions

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

### Billing Instructions

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

### Account Summary – As Of 11/18/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	9,494.55	9,494.55	0.00	64,107.45	64,107.45	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	188,209.80	188,209.80	0.00	622,994.85	622,994.85	0.00
Collected	97,483.05	97,483.05	0.00	188,209.80	188,209.80	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
<b>WIP</b>	<b>118,775.70</b>	<b>118,775.70</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									



11/18/21 13:59:24 PROFORMA STATEMENT FOR MATTER 378827.00005 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Operations & Asse)

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**Billing Address**

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

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11/18/21 13:59:26 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: 1123434

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/04/21	8307784	Analyze communication from counsel for Levin investor group re: settlement with CTC and related issues (.2) communications with counsel for Allred putative class re: list of clients and reconciliation of numbers (.2) analyze issues re: meet and confer with counsel for CTC (.4) discuss same with Receiver (.3) address issues re: 1/13 hearing in pending investor actions in state court (.2) conference call/emails with Receiver and CTC counsel re: issues relating to exchange of information (1.2) discuss strategy re: same with Receiver (.3)	Fates, Edward (Ted)	2.80	1,713.60	1,713.60	WO	HD	TR
01/04/21	8313427	Analysis of the records and transcript to assess overall strategy (.8). Conference with counsel related to settlements (.4). Attend conference call/meeting with CTC counsel and Receiver to address the documents and records, follow-up call regarding same (1.2).	Zaro, David	2.40	1,933.20	3,646.80	WO	HD	TR

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01/05/21	8313457	Review transcript emails, prepare for meeting as to CTC settlements, hearing, document exchange (.6). Several emails and follow-up call with counsel as to CTC, settlement, records and production (.6). Attend the meeting with Receiver and counsel to address court's order and records production, the proposed settlement and follow-up regarding same (1.8). Review of settlement agreement, emails (.6).	Zaro, David	3.60	2,899.80	6,546.60	WO	HD	TR	_____
01/05/21	8636381	Analyze issues relating to proposed CTC/Levin settlement (.9) communications with counsel for Levin investors (.2)	Fates, Edward (Ted)	1.10	673.20	7,219.80	WO	HD	TR	_____
01/06/21	8636384	Analyze issues re: investors and claims involved in proposed CTC/Levin settlement and terms thereof (.8) call with counsel for Levin investor group re: same (1.1) analyze and advise Receiver on issues re: individual investor settlement with CTC (.3) prepare communication and list of documents needed from counsel for Levin investors (.8).	Fates, Edward (Ted)	3.00	1,836.00	9,055.80	WO	HD	TR	_____
01/06/21	8636501	Conferences with counsel for settling investors, follow-up as to next steps/analysis (1.7).	Zaro, David	1.70	1,369.35	10,425.15	WO	HD	TR	_____
01/07/21	8636388	Communications with counsel for Levin investors re: settlement terms and documentation needed (.5).	Fates, Edward (Ted)	0.50	306.00	10,731.15	WO	HD	TR	_____

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01/07/21	8636391	Emails related to Kirby parties, release documents (.4).	Zaro, David	0.40	322.20	11,053.35	WO	HD	TR	_____
01/12/21	8317202	Advise Receiver on vendor and landlord-related claim issues (.3) respond to inquiry from investor re: claims process and distributions (.2)	Fates, Edward (Ted)	0.50	306.00	11,359.35	WO	HD	TR	_____
01/12/21	8318863	Follow-up with counsel as to analysis of the risks to receivership from CTC settlement, assignment of claims, assess strategy.	Zaro, David	0.40	322.20	11,681.55	WO	HD	TR	_____
01/12/21	8636395	Analyze and advise Receiver on potential legal/structural issues with CTC/Levin settlement and potential impact on receivership claims (.8).	Fates, Edward (Ted)	0.80	489.60	12,171.15	WO	HD	TR	_____
01/13/21	8320088	Email/call with counsel and TriCorp mechanic's lien claimant (.4). Call with counsel for TriCorp to address the complaint, Receiver response and stipulation regarding judgment (.3).	Zaro, David	0.70	563.85	12,735.00	WO	HD	TR	_____
01/14/21	8322257	Follow-up with counsel as to the TriCorp lien complaint, proposed stipulation to address the judgment lien.	Zaro, David	0.40	322.20	13,057.20	WO	HD	TR	_____
01/14/21	8322268	Prepare for/attend meeting with Receiver and counsel to work on issues related to the settlement of Levin (Kirby) Group; assignment of claims, the CTC document exchange and follow-up regarding same (1.8). Evaluate the draft response to CTC/call and email with counsel as to foregoing matters and new CTC motion (.8).	Zaro, David	2.60	2,094.30	15,151.50	WO	HD	TR	_____

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01/14/21	8636401	Analyze and discuss concerns with CTC/Levin settlement and proposed assignment of claims to CTC with Receiver (.7) communications with CTC counsel re: same (.2).	Fates, Edward (Ted)	0.90	550.80	15,702.30	WO	HD	TR
01/18/21	8321073	Call with counsel for CTC re: issues with CTC/Levin settlement and associated proposed joint motion	Fates, Edward (Ted)	1.20	734.40	16,436.70	WO	HD	TR
01/18/21	8636404	Evaluate the settlement agreement as to the Levin action/plaintiffs and analysis of claims, assignment and follow-up with counsel (.9). Attend conference call with CTC and assess approach, follow-up with counsel regarding same (1.2).	Zaro, David	2.10	1,691.55	18,128.25	WO	HD	TR
01/19/21	8321691	Call from investor re: claims against CTC and related issues	Fates, Edward (Ted)	0.20	122.40	18,250.65	WO	HD	TR
01/19/21	8325446	Email from secured claimant related to Petaluma asset sale, lien claims, follow-up regarding same.	Zaro, David	0.40	322.20	18,572.85	WO	HD	TR
01/20/21	8636406	Communications with counsel for Levin group re: documents to be provided in connection with CTC settlement (.3).	Fates, Edward (Ted)	0.30	183.60	18,756.45	WO	HD	TR
01/21/21	8327618	Email/call with counsel regarding Levin/Kirby settlement and assignments, investor entity (.4). Several emails, follow-up on the CTC assignment/issues (.3).	Zaro, David	0.70	563.85	19,320.30	WO	HD	TR
01/21/21	8636419	Analyze information from counsel for Levin investors re: entity investors and related issues (.8) discuss same with Receiver and	Fates, Edward (Ted)	1.70	1,040.40	20,360.70	WO	HD	TR

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		counsel (.6) communications with counsel for Levin group re: same (.3).							
01/22/21	8328808	Follow-up on email with regard to mechanic's lien claim and claim as to Petaluma property (.4). Email related to TriCorp mechanic's lien and pending state court litigation (.2).	Zaro, David	0.60	483.30	20,844.00	WO	HD	TR _____
01/25/21	8636420	Call with counsel for CTC re: Levin settlement and related issues (.8).	Fates, Edward (Ted)	0.80	489.60	21,333.60	WO	HD	TR _____
01/25/21	8636427	Work/analysis of open issues and approach to proposed settlement/investor claims issues (.7).	Zaro, David	0.70	563.85	21,897.45	WO	HD	TR _____
01/26/21	8331478	Emails/advice to counsel as to CTC joint motion and address Levine settlement matters (.4). Conference call related to Levine settlement and address reassignment issues/corporated entity claims related issue(.8). Follow-up call with Receiver/counsel to address CTC issues (.4).	Zaro, David	1.60	1,288.80	23,186.25	WO	HD	TR _____
01/26/21	8636436	Discuss response to counsel for Levin group re: information provided relating to CTC/Levin settlement with Receiver (.5) reviewed executed copies of CTC/Levin settlement and related assignment documents and other information provided by counsel for Levin group (.6) discuss same with Receiver (.3) communications with counsel for CTC re: Levin settlement issues (.2) call/emails with counsel for Levin group re: entity investor issues and claim	Fates, Edward (Ted)	3.10	1,897.20	25,083.45	WO	HD	TR _____

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01/27/21	8333262	Several emails/calls with Receiver and counsel for TriCorp related to possible sale-quit claims, follow-up on claim resolution.	Zaro, David	0.40	322.20	25,405.65	WO	HD	TR
01/27/21	8636446	Analyze entity investor documents/information from counsel for Levin investors, discuss same with Receiver (.7).	Fates, Edward (Ted)	0.70	428.40	25,834.05	WO	HD	TR
01/28/21	8330610	Communications with Receiver re: updates to receivership website	Fates, Edward (Ted)	0.10	61.20	25,895.25	WO	HD	TR
01/28/21	8337456	Analysis of investor claimants/settlement issues arising out of assignments and inter-related entities and emails with Receiver/counsel (.6). Attend meeting with Receiver and counsel (.9).	Zaro, David	1.50	1,208.25	27,103.50	WO	HD	TR
01/28/21	8337463	Several emails and call with TriCorp counsel related to D Street transaction and claims resolution.	Zaro, David	0.40	322.20	27,425.70	WO	HD	TR
01/28/21	8636447	Prepare draft correspondence to counsel for Levin investors re: information needed concerning entity investors/claims and potential indemnity agreement (1.4) discuss same with Receiver (.9).	Fates, Edward (Ted)	2.30	1,407.60	28,833.30	WO	HD	TR
01/29/21	8332869	Address direct inquiry from investor, discuss same with Receiver	Fates, Edward (Ted)	0.20	122.40	28,955.70	WO	HD	TR

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01/29/21	8337676	Several emails and analysis of the CTC/Levine assignment issues (.4). Conferences with counsel and Receiver related to the assignment issues, email to counsel (.4).	Zaro, David	0.80	644.40	29,600.10	WO	HD	TR	_____
01/29/21	8566257	Advise on issues re: Levin investors settlement with CTC and related claims/potential clawback claims (.6) work on correspondence with counsel for CTC re: same (.2).	Fates, Edward (Ted)	0.80	489.60	30,089.70	WO	HD	TR	_____
02/03/21	8340076	Discuss response to investor inquiry re: claims against CTC with Receiver	Fates, Edward (Ted)	0.20	122.40	30,212.10	WO	HD	TR	_____
02/03/21	8636449	Communications with Receiver and counsel for CTC re: accounting info for investors re: potential settlements (.2).	Fates, Edward (Ted)	0.20	122.40	30,334.50	WO	HD	TR	_____
02/08/21	8343489	Discuss response to investor inquiry re: claims against CTC with Receiver	Fates, Edward (Ted)	0.30	183.60	30,518.10	WO	HD	TR	_____
02/08/21	8636451	Call with counsel for Levin investor group re: terms of settlement with CTC (.8) advise Receiver re: same (.2).	Fates, Edward (Ted)	1.00	612.00	31,130.10	WO	HD	TR	_____
02/09/21	8344505	Revisions to response to investor inquiry re: claims/settlements with CTC (.3) communications with Receiver re: same (.1)	Fates, Edward (Ted)	0.40	244.80	31,374.90	WO	HD	TR	_____
02/10/21	8636452	Call related to levin/Kirby investor settlements as to the status of negotiations (.3).	Zaro, David	0.30	241.65	31,616.55	WO	HD	TR	_____
02/12/21	8636453	Analyze proposed addendum to CTC/Levin settlement re: issues with assignment of	Fates, Edward (Ted)	0.60	367.20	31,983.75	WO	HD	TR	_____



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		claims to CTC (.6).								
02/12/21	8636455	Email/memo from CTC as to Levin settlement (.6).	Zaro, David	0.60	483.30	32,467.05	WO	HD	TR	_____
02/15/21	8636456	Analysis of proposed settlement amendment, assess/research the issues as to assignment (.4).	Zaro, David	0.40	322.20	32,789.25	WO	HD	TR	_____
02/16/21	8636457	Revise correspondence with counsel for CTC re: Levin/CTC settlement issues (.2)	Fates, Edward (Ted)	0.20	122.40	32,911.65	WO	HD	TR	_____
02/17/21	8356101	Review/evaluate letter/email from TriCorp and SFC claims/proposed settlement, workout proposal (.4). Email call with counsel and TriCorp with regard to proposal (.4).	Zaro, David	0.80	644.40	33,556.05	WO	HD	TR	_____
02/18/21	8354633	Follow-up on SFG/TriCorp D Street proposal and call with TriCorp counsel as to the proposal issues.	Zaro, David	0.40	322.20	33,878.25	WO	HD	TR	_____
02/22/21	8358659	Follow-up on emails with TriCorp and assess offer to purchase the D Street property.	Zaro, David	0.40	322.20	34,200.45	WO	HD	TR	_____
02/22/21	8636466	Call with counsel for Atherton investor group re: potential CTC settlement and related issues (.5) discuss issues re: potential Levin/CTC settlement with counsel for Levin investor group (.4).	Fates, Edward (Ted)	0.90	550.80	34,751.25	WO	HD	TR	_____
02/23/21	8358703	Email, review/evaluate letters concerning the Walter and Noragachi mechanic's lien release demands (.4). email to TriCorp and Receiver related to the mechanic's lien	Zaro, David	0.70	563.85	35,315.10	WO	HD	TR	_____

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		release (.3).								
02/24/21	8636475	Analyze issues re: proposed revisions to Levin/CTC settlement agreement from counsel for Levin investors (.4) calls/emails with counsel for Levin investors and counsel for CTC re: same (.6) analyze proposed joint motion relating to Levin settlement from counsel for CTC (.4).	Fates, Edward (Ted)	1.40	856.80	36,171.90	WO	HD	TR	_____
02/24/21	8636476	Evaluate the proposal to amend the Levin (Kirby)/CTC settlement Agreement, follow-up conference with counsel (.7). Several emails related to CTC litigation/the amended joint motion from CTC counsel (.5).	Zaro, David	1.20	966.60	37,138.50	WO	HD	TR	_____
02/25/21	8636478	Discuss proposed joint motion re: CTC/Levin settlement with Receiver (.2) communications with counsel for CTC and counsel for Levin group re: same (.3).	Fates, Edward (Ted)	0.50	306.00	37,444.50	WO	HD	TR	_____
02/25/21	8636479	Evaluate proposed stipulation related to Levin proposed settlement from CTC and recommend response, email to counsel (.5).	Zaro, David	0.50	402.75	37,847.25	WO	HD	TR	_____
02/26/21	8636480	Call with counsel for Levin group re: CC/Levin settlement issues (.3)	Fates, Edward (Ted)	0.30	183.60	38,030.85	WO	HD	TR	_____
02/28/21	8364922	Emails related to the TriCorp lien releases and follow-up on letters.	Zaro, David	0.40	322.20	38,353.05	WO	HD	TR	_____
03/01/21	8369741	Review emails and finalize the mechanic's liens release letter (.4). Call/email with counsel and address service issues related to lien release letters (.2).	Zaro, David	0.60	483.30	38,836.35	WO	HD	TR	_____

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03/02/21	8369776	Several emails/revisions to the letters concerning mechanic's liens on D Street (.4). Call with counsel/address the lien release letter (.2).	Zaro, David	0.60	483.30	39,319.65	WO	HD	TR	_____
03/05/21	8636482	Review/evaluate the Chicago Title good faith settlement motion and assess issues and settlement terms (1.4). Email to Receiver and counsel concerning the good faith settlement motion (.3).	Zaro, David	1.70	1,369.35	40,689.00	WO	HD	TR	_____
03/08/21	8375400	Email/notice of the D Street foreclosure, follow-up with counsel.	Zaro, David	0.30	241.65	40,930.65	WO	HD	TR	_____
03/09/21	8377970	Several emails/call with the Receiver related to investor claimant, treatment of claims and follow-up to address accounting/process.	Zaro, David	0.50	402.75	41,333.40	WO	HD	TR	_____
03/09/21	8389960	Analyze issues re: CTC motion concerning Levin and Atherton settlements, declaration, exhibits (.9) discuss same with Receiver (.2) call with A. Mojdehi re: issues relating to CTC/Levin settlement, clawback claims and related issues (1.6)	Fates, Edward (Ted)	2.70	1,652.40	42,985.80	WO	HD	TR	_____
03/10/21	8389968	Initial work on response to CTC good faith settlement motion and misrepresentations, investor claim issues (1.9) call with A. Mojdehi re: good faith settlement motion and Levin investors' claim issues (.4)	Fates, Edward (Ted)	2.30	1,407.60	44,393.40	WO	HD	TR	_____
03/11/21	8389978	Analyze legal issues and work on brief in response to CTC good faith settlement motion (5.6) communications with counsel	Fates, Edward (Ted)	6.20	3,794.40	48,187.80	WO	HD	TR	_____

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		for Levin investors re: issues relating to CTC/Levin and Levin investors claims against receivership estate (.4) respond to investor inquiry re: CTC settlement issues (.2)								
03/12/21	8377538	Communications with counsel for Levin investors and Receiver re: issues relating to CTC settlement and Levin investor claims (.3) analyze request for leave filed by Levin investors and advise Receiver re: same (.3)	Fates, Edward (Ted)	0.60	367.20	48,555.00	WO	HD	TR	_____
03/12/21	8383232	Evaluate the outline of the Receiver opposition to the motion for good faith settlement, assess the legal foundational issues and misrepresentations by CTC (1.1).	Zaro, David	1.10	886.05	49,441.05	WO	HD	TR	_____
03/15/21	8379433	Call with counsel for Levin investors re: CTC settlement and good faith settlement motion, information related to entity investors in Levin group	Fates, Edward (Ted)	0.70	428.40	49,869.45	WO	HD	TR	_____
03/15/21	8636484	Work on opposition brief re: CTC good faith settlement motion (1.2).	Fates, Edward (Ted)	1.20	734.40	50,603.85	WO	HD	TR	_____
03/16/21	8380079	Analyze settlement and release documents from counsel for Levin investors (.5) communications with counsel for Levin investors re: same (.4) analyze legal issues and work on brief in opposition to CTC settlements motion (2.3) call with counsel for Atherton investors re: CTC settlement and related issues (1.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	4.60	2,815.20	53,419.05	WO	HD	TR	_____

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03/16/21	8383347	Research/analysis of case law concerning the assignment/transfer of claims (2.2). Work on the draft of section of brief in opposition to good faith settlement motion, including call/email with counsel related to CTC settlement (1.6).	Zaro, David	3.80	3,060.90	56,479.95	WO	HD	TR	_____
03/17/21	8383975	Emails with TriCorp related to D Street letters as to mechanic's lien claimants and release of lien.	Zaro, David	0.30	241.65	56,721.60	WO	HD	TR	_____
03/17/21	8390009	Call with counsel for K. Peterson re: issues relating to CTC settlement motions and related issues (.9) work on opposition to CTC motion re: investor settlements and claims (1.8) communications with counsel for Levin investors (.2)	Fates, Edward (Ted)	2.90	1,774.80	58,496.40	WO	HD	TR	_____
03/17/21	8636499	Further research concerning the assignment and work on revisions to opposition brief related to Good Faith Settlement Motion (1.6)	Zaro, David	1.60	1,288.80	59,785.20	WO	HD	TR	_____
03/18/21	8384160	Evaluate several issues related to the Waltex claim and release of mechanic's lien, follow-up letter to transmit to TriCorp.	Zaro, David	0.40	322.20	60,107.40	WO	HD	TR	_____
03/18/21	8390012	Analyze legal issues related to CTC settlements motion and work on opposition to same (4.6) call with counsel for Levin investors re: entity investors included in settlement and issues relating to settlement and assignment provision (1.1) analyze/compare terms of unsigned Atherton settlement agreement from counsel Atherton investors (.4)	Fates, Edward (Ted)	6.10	3,733.20	63,840.60	WO	HD	TR	_____

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03/18/21	8636500	Research further issues related to the assignment of clams to address alternative approaches to CTC's settlement form (1.2). Call with counsel related to the response to CTC good faith motion (.6). Work on revisions to the draft of the opposition (.7).	Zaro, David	2.50	2,013.75	65,854.35	WO	HD	TR	_____
03/19/21	8383721	Revisions to brief in opposition to CTC motion re: investor settlements and claims against the receivership (1.4) discuss same with Receiver (.2) communications with counsel for K. Peterson et al. re: same (.2)	Fates, Edward (Ted)	1.80	1,101.60	66,955.95	WO	HD	TR	_____
03/19/21	8388569	Meeting to address the draft opposition to good faith settlement motion.	Zaro, David	2.50	2,013.75	68,969.70	WO	HD	TR	_____
03/22/21	8388684	Several emails concerning CTC motion (.2). Evaluate/analysis of Receiver comments, revisions to opposition brief of the Receiver (.7).	Zaro, David	0.90	724.95	69,694.65	WO	HD	TR	_____
03/22/21	8390172	Revisions to opposition brief re: CTC settlements motion re: investor claims (1.1) discuss same with Receiver (.5) communications with counsel for Levin investors re: documents pertaining to entity investors and settlement (.2) communications with Receiver and counsel for Allred investors re: loss amounts and accounting of same (.4)	Fates, Edward (Ted)	2.20	1,346.40	71,041.05	WO	HD	TR	_____
03/23/21	8387057	Analyze issues/arguments raised by K. Peterson et al. re: CTC good faith settlement motion (.7) analyze order re: hearing and briefing, advise Receiver re:	Fates, Edward (Ted)	1.30	795.60	71,836.65	WO	HD	TR	_____

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		same (.2) call with counsel for K. Peterson re: issues relating to CTC good faith settlement motion (.4)								
03/23/21	8388696	Assess court orders related to the good faith settlement hearing and joinder/ex parte application (.2).	Zaro, David	0.20	161.10	71,997.75	WO	HD	TR	_____
03/23/21	8388847	Several emails with counsel regarding Norogachi claimant, mechanic's lien and petition for release of claim/lien.	Zaro, David	0.30	241.65	72,239.40	WO	HD	TR	_____
03/24/21	8391287	Emails with counsel, follow-up analysis call concerning the good faith settlement motion, court's orders, Kim Peterson and related strategy.	Zaro, David	0.70	563.85	72,803.25	WO	HD	TR	_____
03/24/21	8391292	Emails concerning Norogachi and TriCorp claims releases.	Zaro, David	0.20	161.10	72,964.35	WO	HD	TR	_____
03/25/21	8390408	Communications with Receiver and counsel for Allred group re: investor claims and information re: same	Fates, Edward (Ted)	0.40	244.80	73,209.15	WO	HD	TR	_____
03/30/21	8394507	Initial review/analysis of issues raised in CTC reply brief re: good faith settlement motion	Fates, Edward (Ted)	0.70	428.40	73,637.55	WO	HD	TR	_____
03/30/21	8397391	Analysis of the Chicago Title reply and declaration/exhibits, follow-up to address issues (.6). Call with the Receiver related to the CTC reply brief and continued allegations as to good faith issues (.2).	Zaro, David	0.80	644.40	74,281.95	WO	HD	TR	_____

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**Proforma Summary**


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11/18/21 13:59:26 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

**Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000313	Zaro, David	46.10	805.50	37,133.55
001665	Fates, Edward (Ted)	60.70	612.00	37,148.40
		<u>106.80</u>		<u>\$74,281.95</u>
Subtotal Fees				\$74,281.95
Discount				0.00
Total Fees				74,281.95
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 11/18/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	27,858.15	27,858.15	0.00	132,493.50	132,493.50	0.00	426,853.80	426,853.80	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	90,831.15	90,831.15	0.00	278,775.90	278,775.90	0.00
Collected	31,809.15	31,809.15	0.00	90,831.15	90,831.15	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
<b>WIP</b>	<b>148,077.90</b>	<b>148,077.90</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									



11/18/21 13:59:26 PROFORMA STATEMENT FOR MATTER 378827.00006 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Claims & Distribu)

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**Billing Address**

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

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11/18/21 13:59:30 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

**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 Litigatio

Proforma Number: 1123434

Client/Matter Joint Group # 378827-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/05/21	8310167	Analyze issues re: damage claims in SunTrust matter (.4) discuss same with local counsel in FL and Receiver (.5)	Fates, Edward (Ted)	0.90	550.80	550.80	WO	HD	TR
01/08/21	8314100	Communications with local counsel in FL re: consequential damage calculations for SunTrust matter	Fates, Edward (Ted)	0.30	183.60	734.40	WO	HD	TR
01/14/21	8318532	Communications with local counsel in FL re: SunTrust case, litigation strategy and settlement communications	Fates, Edward (Ted)	0.20	122.40	856.80	WO	HD	TR
02/16/21	8358558	Communications with local counsel in FL re: developments/strategy in SunTrust case	Fates, Edward (Ted)	0.40	244.80	1,101.60	WO	HD	TR
03/15/21	8379037	Review and sign stipulation re: continuance of status conference in Luu matter, communications with counsel for plaintiff re: same	Fates, Edward (Ted)	0.30	183.60	1,285.20	WO	HD	TR
03/18/21	8383368	Communications with counsel for plaintiff in pending Luu matter re: continuance of	Fates, Edward (Ted)	0.20	122.40	1,407.60	WO	HD	TR

11/18/21 13:59:30 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
		status conference						
03/22/21	8385421	Communications Receiver and with local counsel in FL re: status and strategy for SunTrust case	Fates, Edward (Ted)	0.50	306.00	1,713.60	WO	HD TR

### Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.80	612.00	1,713.60
		2.80		\$1,713.60
Subtotal Fees				\$1,713.60
Discount				0.00
Total Fees				1,713.60
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 11/18/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	14,607.45	14,607.45	0.00	19,931.85	19,931.85	0.00	51,369.75	51,369.75	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	5,283.45	5,283.45	0.00	30,278.25	30,278.25	0.00
Collected	1,958.40	1,958.40	0.00	5,283.45	5,283.45	0.00	30,278.25	30,278.25	0.00

11/18/21 13:59:30 PROFORMA STATEMENT FOR MATTER 378827.00008 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Pending Litigatio)

AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP Balance</b>	<b>21,091.50</b>	<b>21,091.50</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

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**Billing Address**

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

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11/18/21 13:59:31 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: 1123434

Client/Matter Joint Group # 378827-1

**Fees for Matter 378827.00009.(SEC v. Champion-Cain - Employment/Fees)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/08/21	8314082	Revisions to Receiver's 3rd interim fee application (1.1) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	795.60	795.60	WO	HD	TR
01/13/21	8317991	Finalize Receiver 3rd fee application, exhibits, notice of hearing, and proposed order	Fates, Edward (Ted)	0.30	183.60	979.20	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.60	612.00	979.20
		1.60		\$979.20
Subtotal Fees				\$979.20
Discount				0.00
Total Fees				979.20
Total Disbursements				0.00

**Attorney Billing Instructions**

11/18/21 13:59:31 PROFORMA STATEMENT FOR MATTER 378827.00009 (Krista Freitag, as Receiver for ANI Deve) (SEC v. Champion-Cain - Employment/Fees)

( )	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 11/18/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,187.90	2,187.90	0.00	4,268.70	4,268.70	0.00	8,837.10	8,837.10	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	1,836.00	1,836.00	0.00	4,568.40	4,568.40	0.00
Collected	1,836.00	1,836.00	0.00	1,836.00	1,836.00	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
<b>WIP</b>	<b>4,268.70</b>	<b>4,268.70</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

#### Billing Address

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