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 KRISTA L. FREITAG

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 SOUTHERN DIVISION**

FEDERAL TRADE COMMISSION,
 Plaintiff,

vs.

IMPETUS ENTERPRISE, INC., a
 California corporation, also d/b/a Aiding
 Student Relief, Aiding Students &
 Teachers, Aidnest, Avec Staffing, and
 National Education Student and Teacher;
 FIG TREE & CO., LLC, a California
 limited liability company, also d/b/a
 Aiding Student Relief, Aiding Students
 & Teacher, and Aiding Students &
 Teachers; TUAN DINH DUONG, a/k/a
 Thomas Duong, a/k/a Thomas Dinh,
 individually and as an officer of
 IMPETUS ENTERPRISE, INC.;
 BRENDA AVITIA-PENA, individually
 and as an officer of IMPETUS
 ENTERPRISE, INC. and FIG TREE &
 CO., LLC; and BRIAN COLOMBANA
 d/b/a FUTERO, individually and as an
 officer of FIG TREE & CO., LLC,

Defendants,

NOEL SOLUTIONS, LLC, a Wyoming
 limited liability company,
 Relief Defendant.

Case No. 8:18-cv-01987-JLS-KES

**THIRD INTERIM FEE
 APPLICATION OF KRISTA L.
 FREITAG, COURT-APPOINTED
 RECEIVER, FOR PAYMENT OF
 FEES AND REIMBURSEMENT OF
 EXPENSES**

Date: September 27, 2019
 Time: 10:30 a.m.
 Ctrm: 10A
 Judge: Hon. Josephine L. Staton

Pursuant to the Preliminary Injunction with Asset Freeze, Appointment of Receiver, and Other Equitable Relief entered November 29, 2018 (the "Preliminary Injunction Order"), as well as the Superseding Second Preliminary Injunction with Asset Freeze, Appointment of Receiver, and Other Equitable Relief entered on April 2, 2019, which modified the Preliminary Injunction Order in certain respects, Krista L. Freitag ("Receiver"), the Court-appointed permanent receiver for Impetus Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of their subsidiaries, affiliates, successors and assigns, and any other entity that has conducted any business related to Defendants' student debt relief enterprise, including but not limited to Capital Sun Investments, LLC (d/b/a Studora) or Premier Capital Investments, LLC, and Jimmy Calderon (when conducting activities in relation to any of the foregoing entities) (the "Receivership Entities"), hereby submits this third interim application for approval and payment of fees and reimbursement of expenses ("Third Application").

This Third Application covers the period from April 1, 2019 through June 30, 2019 ("Third Application Period"), and seeks interim approval of \$8,980.20 in fees and \$260.00 in expenses paid, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$7,184.16) and 100% of expenses paid and incurred.

I. INTRODUCTION

This receivership involves several entities which, acting alone or in concert with others, purportedly advertised, marketed, offered to provide, provided, offered for sale or sold student loan debt relief services to consumers throughout the United States; such conduct is at the heart of the action filed by the Federal Trade Commission ("Commission"). Based on the evidence presented by the Commission, the Court found good cause to appoint the Receiver on a temporary basis via the Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of Temporary Receiver, Limited Expediated Discovery, and Order to

1 Show Cause Why Preliminary Injunction Should Not Issue (the "TRO") entered on
 2 November 13, 2018 (Dkt. No. 23), and on a permanent basis via the Preliminary
 3 Injunction Order entered on November 29, 2018 (Dkt. No. 38), and the
 4 Superseding Second Preliminary Injunction with Asset Freeze, Appointment of
 5 Receiver, and Other Equitable Relief (Dkt. No. 68), which modified the
 6 Preliminary Injunction Order in certain respects.

7 The appointment orders confer broad duties, responsibilities, and powers on
 8 the Receiver, including but not limited to taking exclusive custody, control, and
 9 possession of all assets and documents of the Receivership Entities. The
 10 appointment orders also authorize the Receiver to engage counsel to assist her in
 11 the performance of her duties. The Receiver promptly determined that
 12 experienced, qualified counsel was critical due to the scope and complexity of her
 13 duties under the appointment orders. Accordingly, the Receiver engaged Allen
 14 Matkins to assist with urgent legal issues.

15 This Application should be read in conjunction with the Receiver's Fourth
 16 Interim Report (the "Fourth Report") (Dkt. No. 111) and seeks interim approval of
 17 \$8,980.20 in fees for a total of 39.0 hours worked and payment on an interim basis
 18 of 80% of that amount, or \$7,184.16. The work performed is described task-by-
 19 task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	5.0	\$1,284.30
Reporting	6.1	1,527.75
Operations & Asset Sales	21.0	4,291.65
Customer Correspondence & Claims	2.2	501.75
Forensic Accounting	4.7	1,374.75
Total	39.0	\$8,980.20

26 In the initial phase of this equity receivership, significant efforts were
 27 expended to locate and secure assets and business records, to assess business
 28 operations, and to locate, identify and/or verify dozens of potentially affiliated

1 entities/business names and alternative operating locations and/or business
 2 addresses. During the Second and Third Application Periods, the Receiver and her
 3 staff continued to investigate and recover assets, and to secure Receivership Entity
 4 records and data (e.g., 240 Microsoft Exchange email accounts and associated One
 5 Drive files, online Quickbooks accounts, and website domains).

6 Thus far, the Receiver has been able to identify and secure approximately
 7 \$346,000 in cash, primarily from bank accounts and payment processor reserve
 8 balances. At this point, the Receiver is not aware of any other material funds or
 9 assets of the Receivership Entities.

10 The fees for the Third Application Period materially decreased – by 43% -
 11 when compared to the Second Application Period (and by 85% when compared to
 12 the First Application Period). Fees are expected to continue to be limited going
 13 forward. However, if significant additional funds are recovered through the
 14 remaining litigation, settlement or otherwise, it may become feasible to perform an
 15 accounting and claims process necessary to make distributions to consumers; in
 16 such event, the Receiver will seek appropriate relief from the Court in that regard.
 17 On the other hand, if the Commission's remaining claims are resolved without any
 18 further recovery, the Receiver anticipates recommending wrap-up of the
 19 receivership.

20 The Receiver has worked diligently in carrying out her Court-ordered duties
 21 and should be compensated on an interim basis for her work.

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

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

24 **1. 02-General Receivership**

25 The Receiver's work in the General Receivership category primarily focused
 26 on (a) gaining access to books, records and accounts for the numerous Defendant
 27 entities, dba's and related entities, and (h) continued follow-up with certain other
 28 vendors and financial institutions.

1 This work is largely non-recurring and was necessary to (a) implement the
 2 Court's orders and (b) takeover and secure the receivership estate's operations,
 3 books and records. The reasonable and necessary fees for work in this category
 4 during the Third Application Period total \$1,284.30.

5 2. 04-Reporting

6 The Receiver's work in this category during the Third Application Period
 7 focused on preparing the Receiver's Third Report filed on April 29, 2019 (Dkt. No.
 8 87). The reasonable and necessary fees for work in this category during the Third
 9 Application Period total \$1,527.75.

10 3. 05-Operations & Asset Sales

11 During the Third Application Period, the Receiver's time in this category
 12 includes work to monitor mail, secure funds, review records produced and manage
 13 general operational matters. The reasonable and necessary fees for work during
 14 the Third Application Period in this category total \$4,291.65.

15 4. 06-Customer Correspondence & Claims

16 During the Third Application Period, the Receiver worked to correspond
 17 with consumers, as deemed necessary. The reasonable and necessary fees for
 18 work during the Third Application Period in this category total \$501.75.

19 5. 10-Forensic Accounting

20 During the Second Application Period, the Receiver worked to determine if
 21 an efficient assessment of the scope of the Defendants' enterprise could be
 22 determined based upon Quickbooks, banking and CRM records secured. In order
 23 to determine integrity of the accounting data recovered in Quickbooks online
 24 accounts, the Receiver attempted, but was unable to successfully complete a
 25 comprehensive reconciliation of data in the Quickbooks accounts to banking
 26 records to the CRM data. In performing this efficient exercise, it quickly became
 27 clear the accounting data in the Quickbooks accounts is incomplete and thus an
 28 efficient assessment of the scope of the enterprise would not be feasible.

1 During the Third Application Period, the Receiver reviewed additional
 2 CRM records to better understand if the data therein could help determine the
 3 scope of the Impetus enterprise, if necessary.

4 The reasonable and necessary fees for work during the Third Application
 5 Period in this category total \$1,374.75.

6 6. Summary of Expenses Requested for Reimbursement

7 The Receiver requests the Court approve reimbursement of \$260.00 in out-
 8 of-pocket costs. The itemization of such expenses is summarized below by
 9 category. The majority of the expenses incurred are associated with the
 10 receivership estate website updates and general operations.

11 The total reasonable and necessary costs paid by the Receiver during the
 12 Third Application Period is \$260.00, and is broken out by category as follows:

Category	Total
Receivership Website Maintenance	\$255.00
Copies/Supplies	\$5.00
TOTAL COSTS PAID	\$260.00

17 **III. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**
 18 **ALLOWED**

19 "As a general rule, the expenses and fees of a receivership are a charge upon
 20 the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).
 21 These expenses include the fees and expenses of this Receiver and his
 22 professionals, including Allen Matkins. Decisions regarding the timing and
 23 amount of an award of fees and costs to me and his Professionals are committed to
 24 the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577
 25 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

26 In allowing fees, a court should consider "the time, labor and skill required,
 27 but not necessarily that actually expended, in the proper performance of the duties
 28 imposed by the court upon the Receiver, the fair value of such time, labor and skill

1 measured by conservative business standards, the degree of activity, integrity and
2 dispatch with which the work is conducted and the result obtained." *United*
3 *States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation
4 marks omitted). In practical terms, receiver and professional compensation thus
5 ultimately rests upon the result of an equitable, multi-factor balancing test
6 involving the "economy of administration, the burden that the estate may be able
7 to bear, the amount of time required, although not necessarily expended, and the
8 overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d
9 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no
10 single factor is determinative and "a reasonable fee is based [upon] all
11 circumstances surrounding receivership." *SEC v. W.L. Moody & Co., Bankers*
12 *(Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974).

13 As a preliminary matter, the Orders confer on the Receiver substantial duties
14 and powers, including to conduct such investigation and discovery as is necessary
15 to locate and account for all receivership assets, take such action as is necessary
16 and appropriate to assume control over and preserve receivership assets, and
17 employ attorneys and others to investigate and, where appropriate, institute,
18 pursue, and prosecute all claims and causes of action of whatever kind and nature.
19 The Receiver promptly determined that experienced, qualified counsel was
20 necessary due to the complexity of the receivership estate.

21 The Receiver has submitted a detailed fee application which describes the
22 nature of the services rendered, and the identity and billing rate of each individual
23 performing each task. *See* Exhibit A. The Receiver has endeavored to staff
24 matters as efficiently as possible while remaining cognizant of the importance of
25 issues presented and preserving books and records of the receivership estate. The
26 request for fees is based on the Receiver's customary billing rates charged for
27 comparable services provided in other matters, less a 10% discount.

28

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

IV. EVIDENCE SUPPORTING RECEIVER'S RATES

As part of its Superseding Second Preliminary Injunction entered on April 2, 2019, the Court directed the Receiver to provide competent evidence supporting the rates billed for the time of the Receiver and her staff. Dkt. 68, Part XX. As such, the following chart reflects rates charged by receivers and their staff in federal receivership cases in this District and the Southern District of California that have been approved after application to the Court:

Case	Court and Case No.	Receiver	Hourly Rates	Docket Nos.
SEC v. Lambert Van Tuig, et al.	U.S.D.C., Central District of California, Case No. 8:06-cv-00172-AHS-MLG	Thomas Seaman	Receiver \$375 Staff \$60 to \$175	845 and 864
SEC v. Newpoint Financial Services, Inc., et al.	U.S.D.C., Central District of California, Case No 2:10-cv-00124-DDP-JEM	James H. Donell	Receiver \$346.50 Staff \$67.50 to \$247.50	535 and 540
SEC v. Learn Waterhouse, Inc., et al.	U.S.D.C., Southern District of California, Case No. 3:04-cv-02037-W-DHB	Stephen Donell	Receiver \$300 Staff \$75 to \$225	729 and 732
FTC v. American Tax Relief LLC, et al.	U.S.D.C., Central District of California, Case No 2:11-cv-06397-DSF-E	Thomas Seaman	Receiver \$375 Staff \$51 to \$295	295 and 438

1 2 3 4	SEC v. Titanium Blockchain Infrastructure Services Inc., et al.	U.S.D.C., Central District of California, 2:18-cv-04315-DSF- JPR	Josias Dewey	Receiver \$655	5 and 48
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5 Accordingly, the rates of the Receiver and her staff, which range from
6 \$121.50 to \$292.50 per hour, are fair and reasonable in relation to the rates
7 approved for other receivers in similar matters in Southern California.
8 Additionally, pursuant to the Court's order in the Superseding Second Preliminary
9 Injunction, on April 5, 2019 (Dkt. No. 74), the Receiver filed her Statement of
10 Receiver's Qualifications and Rates.

11 V. CONCLUSION

12 The Receiver therefore respectfully requests this Court enter an Order:

- 13 1. Approving the Receiver's fees, on an interim basis, of \$8,980.20;
- 14 2. Authorizing and directing the Receiver to pay 80% of approved fees,
15 or \$7,184.16, from the assets of Receivership Entities;
- 16 3. Approving the Receiver's costs paid in the amount of \$260.00 paid,
17 and authorizing and directing the Receiver to reimburse such costs in full; and
- 18 4. For such other and further relief as the Court deems appropriate.

19
20 Dated: July 31, 2019

By: 
KRISTA L. FREITAG, Receiver

21
22 Dated: July 31, 2019

23 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

24
25 By: /s/ Edward G. Fates
26 EDWARD G. FATES
27 Attorneys for Receiver
28 KRISTA L. FREITAG

EXHIBIT A

FTC v Impetus, et. al.
April 2019 - June 2019 Fees

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
4/1/2019	Corresponded (various) with Five9 re invoices received and access to the system and provided update to K. Freitag. (0.3) Reviewed Onedrive files, in search of quickbooks files, and provided same to K. Freitag. (0.4)	0.7	G. Rodriguez	\$ 256.50	\$ 179.55	\$ -	\$ -	\$ -	\$ -	\$ 179.55	\$ -	\$ -	\$ -	\$ -	\$ -
4/3/2019	Conferred with FTC re: new PI and status of litigation. (5) Conferred with L. Ryan re: creditor list and Atty Fates re: new order requirements. (6) Reviewed new Order. (2) Reviewed and forwarded creditor listing. (4)	1.7	K. Freitag	\$ 292.50	\$ 497.25	\$ -	\$ 497.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4/3/2019	Prepared creditor list, researched contact information and noticed additional same. (1.9) Prepared QuickBooks vendor report. (3)	2.2	L. Ryan	\$121.50	\$ 267.30	\$ -	\$ -	\$ -	\$ -	\$ 267.30	\$ -	\$ -	\$ -	\$ -	\$ -
4/3/2019	Continued work on Five9 (vendor) data retrieval, including providing invoices to accounting, correspondence with vendor re archival data and correspondence with K. Freitag re same. (0.5)	0.5	G. Rodriguez	\$ 256.50	\$ 128.25	\$ -	\$ -	\$ -	\$ -	\$ 128.25	\$ -	\$ -	\$ -	\$ -	\$ -
4/4/2019	Conferred with B. Welke re: creditor listing. (2) Reviewed creditor listing, edited and sent same. (3) Reviewed and signed declaration re: qualifications. (4)	0.9	K. Freitag	\$ 292.50	\$ 263.25	\$ -	\$ 263.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4/4/2019	Researched outstanding invoices and prepared list of vendors owed; noticed same and corresponded with vendors re invoices. (1.9)	1.9	L. Ryan	\$121.50	\$ 230.85	\$ -	\$ -	\$ -	\$ -	\$ 230.85	\$ -	\$ -	\$ -	\$ -	\$ -
4/4/2019	Corresponded with Five9 and K. Freitag re likelihood of audio or transcription files on the service. (0.3)	0.3	G. Rodriguez	\$ 256.50	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -
4/10/2019	Continued research to understand feasibility of CRM data conversion to scope of enterprise (from People's Choice Lead Trac system) with incomplete accounting records; ran various reports and tested information therein to. (3.0)	3.0	K. Freitag	\$ 292.50	\$ 877.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 877.50
4/10/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -
4/10/2019	Reviewed notice from Go-Daddy re renewed website and visited all accounts to turn off auto-renewal. (0.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -
4/11/2019	Prepared CRM reports and uploaded same. (7)	0.7	K. Freitag	\$ 292.50	\$ 204.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 204.75
4/12/2019	Conferred with Chase legal re statements and demand for funds, resent same. (8) Began to work on Q1 receipts and disbursement report, downloaded statements and reconciled Q1. (9)	1.7	L. Ryan	\$121.50	\$ 206.55	\$ -	\$ 97.20	\$ -	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4/15/2019	Reviewed various correspondence. (2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -
4/15/2019	Continued to work on receipts and disbursement report. (6)	0.6	L. Ryan	\$121.50	\$ 72.90	\$ -	\$ -	\$ -	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4/16/2019	Conferred with FTC and Atty Fates re: Capital Sun and IP addresses. (6)	0.6	K. Freitag	\$ 292.50	\$ 175.50	\$ -	\$ 175.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4/16/2019	Researched internet vendor and located account information. (9)	0.9	L. Ryan	\$121.50	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ -
4/17/2019	Coordinated research on internet service providers. (2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4/17/2019	Researched, prepared and sent T. Fates requested vendor information. (1.4)	1.4	L. Ryan	\$121.50	\$ 170.10	\$ -	\$ -	\$ -	\$ -	\$ 170.10	\$ -	\$ -	\$ -	\$ -	\$ -
4/17/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (3)	0.3	A. Herren	\$ 225.00	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ -
4/18/2019	Redirected USdebtrellief.us to receivership page after discussing error with Godaddy customer support. (0.4)	0.4	G. Rodriguez	\$ 256.50	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ -
4/22/2019	Corresponded re bank deposit and account name. (2)	0.2	L. Ryan	\$121.50	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ -
4/23/2019	Reviewed correspondence; reviewed orders; conferred with G. Rodriguez re: domain renewals. (3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -
4/23/2019	Corresponded with Chase re account. (1)	0.1	L. Ryan	\$121.50	\$ 12.15	\$ -	\$ -	\$ -	\$ -	\$ 12.15	\$ -	\$ -	\$ -	\$ -	\$ -
4/23/2019	Deposited Chase check (required follow-up); corresponded with L. Ryan re same; archived same. (5)	0.5	A. Herren	\$ 225.00	\$ 112.50	\$ -	\$ -	\$ -	\$ -	\$ 112.50	\$ -	\$ -	\$ -	\$ -	\$ -
4/23/2019	Conferred with K. Freitag re correspondence from B. Colombana re closure of hosting accounts. (0.1)	0.1	G. Rodriguez	\$ 256.50	\$ 25.65	\$ -	\$ -	\$ -	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ -	\$ -
4/25/2019	Prepared response to Colombana. (2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -
4/26/2019	Researched Capital Sun accounting as requested by parties (in light of settlement discussions). (1.0)	1.0	K. Freitag	\$ 292.50	\$ 292.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 292.50
4/28/2019	Reviewed receipts and disbursements; began drafting third interim report. (3.1)	3.1	K. Freitag	\$ 292.50	\$ 906.75	\$ -	\$ -	\$ -	\$ 906.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
4/29/2019	Met with FTC and Atty Fates re: Calderon settlement needs. (.3) Worked on updates to third interim report. (1.5) Coordinated posting of documents to website. (.3)	2.1	K. Freitag	\$ 292.50	\$ 614.25	\$ -	\$ -	\$ -	\$ 438.75	\$ 175.50	\$ -	\$ -	\$ -	\$ -	\$ -
4/29/2019	Researched vendor payments. (.3)	0.3	L. Ryan	\$121.50	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ -
5/1/2019	Recorded accounts payable and prepared payments. (.5)	0.5	L. Ryan	\$121.50	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ -
5/2/2019	Coordinated posting of documents to website. (.2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -
5/10/2019	Sent subpoena request re Chase account to T. Fates. (.2)	0.2	L. Ryan	\$121.50	\$ 24.30	\$ -	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5/13/2019	Reviewed vendor correspondence; conferred with G. Rodriguez re: same. (.2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -
5/13/2019	Reviewed and researched Impetus account with Ytel to resolve an emailing glitch and sought additional information from Ytel to resolve the problem. (0.9)	0.9	G. Rodriguez	\$ 256.50	\$ 230.85	\$ -	\$ -	\$ -	\$ -	\$ 230.85	\$ -	\$ -	\$ -	\$ -	\$ -
5/14/2019	Reviewed Cox IP address response; forwarded same to FTC. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5/15/2019	Updated email addresses as requested by Ytel to resolve technical problem. (0.3)	0.3	G. Rodriguez	\$ 256.50	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -
5/22/2019	Conferred with Atty Fates re: subpoena response, provided EINs. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5/23/2019	Conferred with K. Freitag re IP address subpoena, reviewed results of subpoena and planned for conference call with FTC. (0.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5/24/2019	Met with FTC re: status of case. (.1) Worked to obtain sandbox access to Lead Trac. (.3)	0.4	K. Freitag	\$ 292.50	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ -
5/28/2019	Recorded accounts payable and vendor payments; reconciled bank account. (.6)	0.6	L. Ryan	\$121.50	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ -
5/31/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.6)	0.6	A. Herren	\$ 225.00	\$ 135.00	\$ -	\$ -	\$ -	\$ -	\$ 135.00	\$ -	\$ -	\$ -	\$ -	\$ -
6/5/2019	Followed up on, reviewed and provided Lead Trac access, as requested. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -
6/5/2019	Responded to vendor correspondence re collections. (.3)	0.3	L. Ryan	\$121.50	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ -
6/7/2019	Researched reports and ability to pull Log data; sent correspondence to NDS re: same. (.1.3)	1.3	K. Freitag	\$ 292.50	\$ 380.25	\$ -	\$ -	\$ -	\$ -	\$ 380.25	\$ -	\$ -	\$ -	\$ -	\$ -
6/10/2019	Recorded accounts payable. (.8)	0.8	L. Ryan	\$121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -
6/11/2019	Conferred with J. Millard re: LeadTrac data extraction. (.2) Updated email autoreply. (.1)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ 58.50	\$ 29.25	\$ -	\$ -	\$ -	\$ -
6/11/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.5) Updated case email auto reply; corresponded with K. Freitag re same. (.1) Corresponded with numerous consumers re status of receivership and potential claims. (2.0)	2.6	A. Herren	\$ 225.00	\$ 585.00	\$ -	\$ -	\$ -	\$ -	\$ 112.50	\$ 472.50	\$ -	\$ -	\$ -	\$ -
6/12/2019	Conferred with National Data Systems re: custom data extraction. (.4) Prepared update correspondence to FTC. (.1)	0.5	K. Freitag	\$ 292.50	\$ 146.25	\$ -	\$ -	\$ -	\$ -	\$ 146.25	\$ -	\$ -	\$ -	\$ -	\$ -
6/15/2019	Researched key search words for C. Connors. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -
6/27/2019	Reviewed CRM data provided by C. Connors. (.5) Conferred with FTC and followed up with C. Connors re: data dump and analysis. (.9)	1.4	K. Freitag	\$ 292.50	\$ 409.50	\$ -	\$ -	\$ -	\$ -	\$ 409.50	\$ -	\$ -	\$ -	\$ -	\$ -
Total April 2019 - June 2019 Fees		39.0			\$ 8,980.20	\$ -	\$ 1,284.30	\$ -	\$ 1,527.75	\$ 4,291.65	\$ 501.75	\$ -	\$ -	\$ -	\$ 1,374.75

Date	Description	Expense
4/30/2019	Website Updated - April 2019	\$ 170.00
6/30/2019	Website Updated - June 2019	\$ 85.00
6/30/2019	Copies - June 2019	\$ 5.00

\$ 260.00