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 KRISTA L. FREITAG

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

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

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

Date: June 7, 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 second interim application for approval and payment of fees and reimbursement of expenses ("Second Application").

This Second Application covers the period from January 1, 2019 through March 31, 2019 ("Second Application Period"), and seeks interim approval of \$15,731.55 in fees and \$3,778.68 in expenses paid, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$12,585.24) 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
 2 on November 13, 2018 (Dkt. No. 23), and on a permanent basis via the
 3 Preliminary Injunction Order entered on November 29, 2018 (Dkt. No. 38), and
 4 the 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 Third
 16 Interim Report (the “Third Report”) (Dkt. No. 87) and seeks interim approval of
 17 \$15,731.55 in fees for a total of 81.2 hours worked and payment on an interim
 18 basis of 80% of that amount, or \$12,585.24. The work performed is described
 19 task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	11.5	\$2,472.75
Asset Investigation & Recovery	.3	76.95
Reporting	11.8	2,487.60
Operations & Asset Sales	33.2	6,466.95
Customer Correspondence & Claims	3.8	886.50
Forensic Accounting	20.6	3,340.80
Total	81.2	\$15,731.55

1 In the initial phase of this equity receivership, significant efforts were
2 expended to locate and secure assets and business records, to assess business
3 operations, and to locate, identify and/or verify dozens of potentially affiliated
4 entities/business names and alternative operating locations and/or business
5 addresses. During the Second Application Period, the Receiver and her staff
6 continued to investigate and recover assets, and to secure Receivership Entity
7 records and data (e.g., 240 Microsoft Exchange email accounts and associated One
8 Drive files, online Quickbooks accounts, and website domains). Such data is
9 helpful, although proven not determinative, in identifying the entire scope of the
10 Receivership Entities' enterprise, the consumers affected, and/or the specific
11 amounts invested and expended.

12 Thus far, the Receiver has been able to identify and secure approximately
13 \$345,000 in cash, primarily from bank accounts and payment processor reserve
14 balances. At this point, the Receiver is not aware of any other material funds or
15 assets of the Receivership Entities, but does expect a few more small recoveries.

16 The fees for the Second Application Period materially decreased – by 73% -
17 when compared to the First Application Period. Fees are expected to continue to
18 be limited going forward. However, if significant additional funds are recovered
19 through the ongoing, active litigation or otherwise, it may become feasible to
20 perform an accounting and claims process necessary to make distributions to
21 consumers; in such event, the Receiver will seek appropriate relief from the Court
22 in that regard. If the active litigation does not result in resolution of the underlying
23 case in the near term, the Receiver anticipates recommending wrap-up of the
24 receivership.

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

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II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED

A. Categories and Descriptions of Work

1. 02-General Receivership

The Receiver's work in the General Receivership category primarily focused on (a) gaining access to books, records and accounts for the numerous Defendant entities, dba's and related entities (e.g, Microsoft Exchange files and Quickbooks online accounts), and (h) continued follow-up with certain other vendors and financial institutions.

This work is largely non-recurring and was necessary to (a) implement the Court's orders and (b) takeover and secure the receivership estate's operations, books and records. The reasonable and necessary fees for work in this category during the Second Application Period total \$2,472.75.

2. 03-Asset Investigation & Recovery

The reasonable and necessary fees for work in this category during the Second Application Period, which primarily reflect research on potential real property assets, total \$76.95.

3. 04-Reporting

The Receiver's work in this category during the Second Application Period focused on preparing the Receiver's Second Report filed on January 14, 2019 (Dkt. No. 44). The reasonable and necessary fees for work in this category during the Second Application Period total \$2,487.60.

4. 05-Operations & Asset Sales

During the Second Application Period, the Receiver's time in this category includes work to monitor mail, secure funds, review records produced and manage general operational matters. The reasonable and necessary fees for work during the Second Application Period in this category total \$6,466.95.

1 5. 06-Customer Correspondence & Claims

2 During the Second Application Period, the Receiver worked to correspond
3 with employees and consumers, as deemed necessary. The reasonable and
4 necessary fees for work during the Second Application Period in this category total
5 \$886.50.

6 6. 10-Forensic Accounting

7 During the Second Application Period, the Receiver worked to determine if
8 an efficient assessment of the scope of the Defendants' enterprise could be
9 determined based upon Quickbooks, banking and CRM records secured. In order
10 to determine integrity of the accounting data recovered in Quickbooks online
11 accounts, the Receiver attempted, but was unable to successfully complete a
12 comprehensive reconciliation of data in the Quickbooks accounts to banking
13 records to the CRM data. In performing this efficient exercise, it quickly became
14 clear the accounting data in the Quickbooks accounts is incomplete and thus an
15 efficient assessment of the scope of the enterprise would not be feasible.

16 The reasonable and necessary fees for work during the Second Application
17 Period in this category total \$3,340.80.

18 7. Summary of Expenses Requested for Reimbursement

19 The Receiver requests the Court approve reimbursement of \$3,778.68 in
20 out-of-pocket costs. The itemization of such expenses is summarized below by
21 category. The majority of the expenses incurred relate to securing the Microsoft
22 Exchange 240 email accounts and associated One Drive accounts, which was
23 necessary to preserve and protect the available electronic records and data of the
24 Receivership Entities. The Receiver also incurred expenses associated with the
25 receivership estate website updates and general operations.

26 The total reasonable and necessary costs paid by the Receiver during the
27 Second Application Period is \$3,778.68, and is broken out by category as follows:
28

Category	Total
Receivership Website Maintenance	\$650.00
Copies/Supplies	\$6.25
Postage	\$122.43
Securing of Microsoft Exchange Data Files (one of two payments)	\$3,000.00
TOTAL COSTS PAID	\$3,778.68

III. 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 his professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to me and his Professionals are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the Receiver, the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no

1 single factor is determinative and "a reasonable fee is based [upon] all
2 circumstances surrounding receivership." *SEC v. W.L. Moody & Co., Bankers*
3 (*Unincorporated*), 374 F. Supp. 465, 480 (S.D. Tex. 1974).

4 As a preliminary matter, the Orders confer on the Receiver substantial duties
5 and powers, including to conduct such investigation and discovery as is necessary
6 to locate and account for all receivership assets, take such action as is necessary
7 and appropriate to assume control over and preserve receivership assets, and
8 employ attorneys and others to investigate and, where appropriate, institute,
9 pursue, and prosecute all claims and causes of action of whatever kind and nature.
10 The Receiver promptly determined that experienced, qualified counsel was
11 necessary due to the complexity of the receivership estate.

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

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

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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
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

1 Accordingly, the rates of the Receiver and her staff, which range from
 2 \$121.50 to \$292.50 per hour, are fair and reasonable in relation to the rates
 3 approved for other receivers in similar matters in Southern California.
 4 Additionally, pursuant to the Court's order in the Superseding Second Preliminary
 5 Injunction, on April 5, 2019 (Dkt. No. 74), the Receiver filed her Statement of
 6 Receiver's Qualifications and Rates.

7 V. CONCLUSION

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

- 9 1. Approving the Receiver's fees, on an interim basis, of \$15,731.55;
- 10 2. Authorizing and directing the Receiver to pay 80% of approved fees,
 11 or \$12,585.24, from the assets of Receivership Entities;
- 12 3. Approving the Receiver's costs paid in the amount of \$3,778.68 paid,
 13 and authorizing and directing the Receiver to reimburse such costs in full; and
- 14 4. For such other and further relief as the Court deems appropriate.

15
 16 Dated: May 1, 2019

By: 

KRISTA L. FREITAG, Receiver

17
 18
 19
 20 Dated: May 2, 2019

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

21
 22 By: /s/ Edward G. Fates

EDWARD G. FATES
 Attorneys for Receiver
 KRISTA L. FREITAG

EXHIBIT A

FTC v Impetus, et. al.

January 2019 - March 2019 Fees

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
1/2/2019	Scanned and archived Wells Fargo bank statements; corresponded with L. Ryan re same. (.5) Scanned and archived merchant services statements. (.4)	0.9	A. Herren	\$ 225.00	\$ 202.50	\$ -	\$ -	\$ -	\$ -	\$ 202.50	\$ -	\$ -	\$ -	\$ -	\$ -
1/3/2019	Scanned and archived Wells Fargo bank statements; corresponded with L. Ryan re same. (1.5)	1.5	A. Herren	\$ 225.00	\$ 337.50	\$ -	\$ -	\$ -	\$ -	\$ 337.50	\$ -	\$ -	\$ -	\$ -	\$ -
1/4/2019	Conferred with numerous consumers re: case information. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
1/4/2019	Conferred, briefly with customer re closed operations of Aidnest. (0.1)	0.1	G. Rodriguez	\$ 256.50	\$ 25.65	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ -
1/8/2019	Pulled client contact data from three CRM databases. (1.9) Researched various other findings from bank data. (.6) Conferred with Atty Fates re: noticing. (.2)	2.7	K. Freitag	\$ 292.50	\$ 789.75	\$ -	\$ 58.50	\$ -	\$ -	\$ 731.25	\$ -	\$ -	\$ -	\$ -	\$ -
1/8/2019	Scanned and archived numerous Wells Fargo bank statements; corresponded with L. Ryan re same. (.3)	0.3	A. Herren	\$ 225.00	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ -
1/8/2019	Began receipts and disbursement reports and gathered bank statements. (2.4) Conferred with Thrifty and corresponded re same. (.4)	2.8	L. Ryan	\$ 121.50	\$ 340.20	\$ -	\$ -	\$ -	\$ 291.60	\$ 48.60	\$ -	\$ -	\$ -	\$ -	\$ -
1/8/2019	Conferred with Nationwide insurance re questions on the policy for Impetus. (0.1) Conferred with customer seeking additional information re Aidnest closure and provided basic information regarding the case. (0.3)	0.4	G. Rodriguez	\$ 256.50	\$ 102.60	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -
1/9/2019	Retrieved bank statements at Chase Bank; scanned and archived same; corresponded with L. Ryan re same. (.8)	0.8	A. Herren	\$ 225.00	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ -
1/9/2019	Continued to work on receipts and disbursement report. (2.3) Conferred with Chase and prepared demand for funds. (.6)	2.9	L. Ryan	\$ 121.50	\$ 352.35	\$ -	\$ 72.90	\$ -	\$ 279.45	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/9/2019	Briefly reviewed correspondence from Atty Berengaut confirming access point for entities email at Microsoft. (0.1)	0.1	G. Rodriguez	\$ 256.50	\$ 25.65	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/10/2019	Finalized receipts and disbursement report. (.6) Conferred with Chase re balances. (.2) Researched, conferred and noticed additional vendors. (.8)	1.6	L. Ryan	\$ 121.50	\$ 194.40	\$ -	\$ 121.50	\$ -	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/11/2019	Prepared initial draft of second interim report. (3.7)	3.7	K. Freitag	\$ 292.50	\$ 1,082.25	\$ -	\$ -	\$ -	\$ 1,082.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/11/2019	Processed change of address for California location; updated tracking log; corresponded with K. Freitag re same. (.2)	0.2	A. Herren	\$ 225.00	\$ 45.00	\$ -	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/11/2019	Returned employee verification call and archived and responded to vendor response. (.9)	0.9	L. Ryan	\$ 121.50	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ -
1/11/2019	Reviewed information from Nationwide insurance re auto policy for J. Calderon and provided details of the same to K. Freitag. (0.2) Provided revisions to Receiver's Report providing detail on takeover of accounts. (1.1) Coordinated receipt of access to Microsoft accounts, pulled relevant reports and provided same to K. Freitag, updated account log and researched method for downloading all relevant email files. (1.2)	2.5	G. Rodriguez	\$ 256.50	\$ 641.25	\$ -	\$ 359.10	\$ -	\$ 282.15	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/12/2019	Prepared initial draft of second interim report; conferred with Atty Fates re: same. (.7)	0.7	K. Freitag	\$ 292.50	\$ 204.75	\$ -	\$ -	\$ -	\$ 204.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/12/2019	Provided K. Freitag additional data points as requested in anticipation of filing Receiver's Report. (0.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ -	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/14/2019	Finalized draft of second interim report; signed same. (.5)	0.5	K. Freitag	\$ 292.50	\$ 146.25	\$ -	\$ -	\$ -	\$ 146.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/14/2019	Conferred with customer re student loan relief and assisted him with signing up on the website. (0.3)	0.3	G. Rodriguez	\$ 256.50	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -
1/15/2019	Conferred with numerous customers re case information. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
1/16/2019	Briefly reviewed the Receiver's Preliminary Report and coordinated e-mail blast. (0.3)	0.3	G. Rodriguez	\$ 256.50	\$ 76.95	\$ -	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
1/17/2019	Reviewed Madera documents and charges. (1.0) Researched and followed up on merchant accounts and conferred with Paymentch. (1.1)	2.1	L. Ryan	\$ 121.50	\$ 255.15	\$ -	\$ -	\$ -	\$ -	\$ 255.15	\$ -	\$ -	\$ -	\$ -	\$ -
1/17/2019	Briefly reviewed subpoena response from Go-Daddy. (0.1)	0.1	G. Rodriguez	\$ 256.50	\$ 25.65	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/18/2019	Scanned and archived auction check; corresponded with K. Freitag and L. Ryan re same. (.2)	0.2	A. Herren	\$ 225.00	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ -
1/23/2019	Reviewed email records to coordinate downloading of same for project with outside contractor. (0.3)	0.3	G. Rodriguez	\$ 256.50	\$ 76.95	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/24/2019	Reviewed banking records. (.9) Reviewed options in CRM software; conferring with administrators to determine if customized reporting is possible. (.4) Followed up on a few vendors' responses. (.1)	1.4	K. Freitag	\$ 292.50	\$ 409.50	\$ -	\$ -	\$ -	\$ -	\$ 409.50	\$ -	\$ -	\$ -	\$ -	\$ -
1/24/2019	Conferred with Paymentech and prepared correspondence re same. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -
1/24/2019	Confirmed details of assignment with consultant. (0.1)	0.1	G. Rodriguez	\$ 256.50	\$ 25.65	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/25/2019	Checked on download of all Microsoft OneDrive and Email accounts. (.1) Conferred with G. Rodriguez re: certain vendors, potential asset, websites. (.7)	0.8	K. Freitag	\$ 292.50	\$ 234.00	\$ -	\$ -	\$ -	\$ -	\$ 234.00	\$ -	\$ -	\$ -	\$ -	\$ -
1/25/2019	Forwarded vendor response and corresponded with service provider re log in information. (.9)	0.9	L. Ryan	\$ 121.50	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ -
1/25/2019	Conferred with K Freitag re access to email accounts, coordinated access to high usage accounts, cross referenced domain/web addresses with those under our existing control and determined that those website that are not under our control are not functioning. (2.0) Continued work on gaining access to Five9 account including lengthy troubleshooting with customer service and discussion with K. Freitag re same (0.8) Researched property for potential recovery and provided same report to K. Freitag. (0.3) Corresponded with consultant re download of data. (0.1)	3.2	G. Rodriguez	\$ 256.50	\$ 820.80	\$ -	\$ 743.85	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/28/2019	Reviewed correspondence; prepared for call. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -
1/28/2019	Corresponded with K. Freitag re mail. (.1)	0.1	A. Herren	\$ 225.00	\$ 22.50	\$ -	\$ -	\$ -	\$ -	\$ 22.50	\$ -	\$ -	\$ -	\$ -	\$ -
1/28/2019	Corresponded with vendor re websites. (.3)	0.3	L. Ryan	\$ 121.50	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ -
1/29/2019	Conferred with FTC re: update post government shut down. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25					\$ 29.25					\$ -
1/29/2019	Scanned and archived mail; corresponded with L. Ryan re same. (.7)	0.7	A. Herren	\$ 225.00	\$ 157.50	\$ -	\$ -	\$ -	\$ -	\$ 157.50	\$ -	\$ -	\$ -	\$ -	\$ -
1/29/2019	Reviewed correspondence from web developer re usdebtrelief.us account and corresponded with K. Freitag re same. (0.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
1/31/2019	Briefly reviewed PST files and corresponded with consultant re backup of one drive data. (0.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2/4/2019	Coordinated PST Files download with G. Rodriguez. (.1) Downloaded various files from FTC. (.3)	0.4	K. Freitag	\$ 292.50	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ -
2/4/2019	Continued work to resolve the back up of data from the Microsoft office account, including various discussions with consultant to resolve Microsoft account issues and provided correspondence to K. Freitag re same. (0.7)	0.7	G. Rodriguez	\$ 256.50	\$ 179.55	\$ -	\$ 179.55	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2/5/2019	Distributed hard drive via FedEx to FTC; corresponded with G. Rodriguez re same. (.3)	0.3	A. Herren	\$ 225.00	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ -
2/10/2019	Scanned and archived mail; corresponded with L. Ryan re same. (1.5)	1.5	A. Herren	\$ 225.00	\$ 337.50	\$ -	\$ -	\$ -	\$ -	\$ 337.50	\$ -	\$ -	\$ -	\$ -	\$ -
2/11/2019	Distributed vendor letter; corresponded with L. Ryan re same. (.2)	0.2	A. Herren	\$ 225.00	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ -
2/11/2019	Researched and noticed additional vendors. (2.0) Researched and corresponded with CPA re tax returns and notice same. (.4)	2.4	L. Ryan	\$ 121.50	\$ 291.60	\$ -	\$ -	\$ -	\$ -	\$ 291.60	\$ -	\$ -	\$ -	\$ -	\$ -
2/11/2019	Conferred with K. Freitag re status of Onedrive download and discussion with consultant re same. (0.6)	0.6	G. Rodriguez	\$ 256.50	\$ 153.90	\$ -	\$ 153.90	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2/12/2019	Reviewed correspondence and conferred with G. Rodriguez re: OneDrive data download. (.2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
2/12/2019	Researched and noticed additional vendors and archived vendor responses. (1.4)	1.4	L. Ryan	\$ 121.50	\$ 170.10	\$ -	\$ -	\$ -	\$ -	\$ 170.10	\$ -	\$ -	\$ -	\$ -	\$ -
2/12/2019	Conferred with customer re student loan relief. (0.3) Corresponded with K. Freitag re downloading of data from Onedrive. (0.1)	0.4	G. Rodriguez	\$ 256.50	\$ 102.60	\$ -	\$ 25.65	\$ -	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -
2/14/2019	Responded to vendor re domains. (.5)	0.5	L. Ryan	\$ 121.50	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ -
2/15/2019	Scanned and archived mail; corresponded with L. Ryan re same. (1.1) Conferred with numerous consumers re case information. (.8)	0.9	A. Herren	\$ 225.00	\$ 202.50	\$ -	\$ -	\$ -	\$ -	\$ 22.50	\$ 180.00	\$ -	\$ -	\$ -	\$ -
2/18/2019	Opened Impetus QuickBooks online and prepared reports. (1.1)	1.1	L. Ryan	\$ 121.50	\$ 133.65	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 133.65
2/19/2019	Coordinated and conferred with L. Ryan re: Intuit items. (.4)	0.4	K. Freitag	\$ 292.50	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ -
2/19/2019	Continued to review and download reports from QuickBooks and researched bank accounts listed. (1.3)	1.3	L. Ryan	\$ 121.50	\$ 157.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 157.95
2/20/2019	Scanned and archived mail; corresponded with L. Ryan re same. (.7)	0.7	A. Herren	\$ 225.00	\$ 157.50	\$ -	\$ -	\$ -	\$ -	\$ 157.50	\$ -	\$ -	\$ -	\$ -	\$ -
2/20/2019	Reviewed and researched bank accounts in QuickBooks and traced to statements. (2.1) Separated Chase production into usable form and log same. (1.2)	3.3	L. Ryan	\$ 121.50	\$ 400.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 400.95
2/21/2019	Conferred with numerous customers re case information. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
2/21/2019	Conferred and corresponded with agent of service and provided court documents and requested information to same. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -
2/26/2019	Scanned and archived mail; corresponded with L. Ryan re same. (.5)	0.5	A. Herren	\$ 225.00	\$ 112.50	\$ -	\$ -	\$ -	\$ -	\$ 112.50	\$ -	\$ -	\$ -	\$ -	\$ -
3/7/2019	Conferred with FTC re: OSC items. (.3) Ran and began review of payment reports in Lead Trac system; conferred with Atty Fates and L. Ryan re: various OSC items. (1.4)	1.7	K. Freitag	\$ 292.50	\$ 497.25	\$ -	\$ -	\$ -	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ 409.50
3/7/2019	Scanned and archived mail; corresponded with L. Ryan re same. (1.1)	0.1	A. Herren	\$ 225.00	\$ 22.50	\$ -	\$ -	\$ -	\$ -	\$ 22.50	\$ -	\$ -	\$ -	\$ -	\$ -
3/7/2019	Reviewed FTC forensic report and researched ability to report on cash activity. (1.2)	1.2	L. Ryan	\$ 121.50	\$ 145.80	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 145.80
3/8/2019	Briefly reviewed banking records against CSM records for Impetus. (1.4)	1.4	K. Freitag	\$ 292.50	\$ 409.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 409.50
3/8/2019	Scanned and archived mail; corresponded with L. Ryan re same. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -
3/8/2019	Reviewed bank accounts with K. Freitag. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 97.20
3/9/2019	Summarized Chase and Citibank account information and created same for merchant statements and corresponding bank statements. (3.6)	3.6	L. Ryan	\$ 121.50	\$ 437.40	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 437.40
3/12/2019	Worked on review of sample forensic work on Impetus. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 87.75
3/12/2019	Corresponded multiple times CPA re taxes. (.3) Reviewed accounts payable. (.6)	0.9	L. Ryan	\$ 121.50	\$ 109.35	\$ -	\$ 36.45	\$ -	\$ -	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ -
3/14/2019	Researched tax returns, conferred with tax prepared and filed extensions. (1.8) Reviewed Balance Sheet and Income Statement provided and compare to QuickBooks reports. (1.6)	3.4	L. Ryan	\$ 121.50	\$ 413.10	\$ -	\$ 218.70	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 194.40
3/15/2019	Corresponded with numerous customers re status of case and court order; corresponded with K. Freitag re same. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
3/18/2019	Prepared analysis of payments, reviewed QB to disclosure schedules, etc. in preparation for call with FTC. (1.8) Attended call with FTC. (.4)	2.2	K. Freitag	\$ 292.50	\$ 643.50	\$ -	\$ -	\$ -	\$ -	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ 526.50
3/18/2019	Scanned and archived mail; corresponded with L. Ryan re same. (.2)	0.2	A. Herren	\$ 225.00	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ -
3/19/2019	Researched merchants on application and bank statements. (.9)	0.9	L. Ryan	\$ 121.50	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
3/20/2019	Conferred with merchant, prepared and corresponded with merchant regarding Studora application. (.7)	0.7	L. Ryan	\$ 121.50	\$ 85.05	\$ -	\$ -	\$ -	\$ -	\$ 85.05	\$ -	\$ -	\$ -	\$ -	\$ -
3/21/2019	Researched Calderon documents and multiple merchants applications; conferred and corresponded with same. (1.8) Summarized Capital Sun Investments Wells Fargo account and reviewed preliminary accounting for same. (2.8)	4.6	L. Ryan	\$ 121.50	\$ 558.90	\$ -	\$ -	\$ -	\$ -	\$ 218.70	\$ -	\$ -	\$ -	\$ -	\$ 340.20
3/25/2019	Worked on review of declarant accounts in CRM software. (1.2)	1.2	K. Freitag	\$ 292.50	\$ 351.00	\$ -	\$ -	\$ -	\$ -	\$ 351.00	\$ -	\$ -	\$ -	\$ -	\$ -
3/26/2019	Worked on review of declarant accounts in CRM software. (.6) Conferred with FTC re: same and update on settlement discussions. (.2) Conferred with L. Ryan re: numbers verification/review of tax returns. (.4)	1.2	K. Freitag	\$ 292.50	\$ 351.00	\$ -	\$ 117.00	\$ -	\$ -	\$ 234.00	\$ -	\$ -	\$ -	\$ -	\$ -
3/26/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.3) Prepared files for storage; updated tracking log re same; scheduled pickup with Iron Mountain re same. (.5)	0.8	A. Herren	\$ 225.00	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ -
3/26/2019	Researched prior year Income Statements. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -
3/29/2019	Conferred with numerous customers re case information. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
Total January 2019 - March 2019 Fees		81.2			\$ 15,731.55	\$ -	\$ 2,472.75	\$ 76.95	\$ 2,487.60	\$ 6,466.95	\$ 886.50	\$ -	\$ -	\$ -	\$ 3,340.80

Date	Description	Expense
12/31/2018	Website Updated - December 18	\$ 170.00
1/14/2019	Change of Address	\$ 1.00
1/31/2019	Website Updated - January 19	\$ 480.00
1/31/2019	Microsoft Email export - data preservation	\$ 3,000.00
2/28/2019	FedEx - February 19	\$ 60.50
2/28/2019	Postage - February 19	\$ 1.00
2/28/2019	Copies - February 19	\$ 5.25
3/31/2019	FedEx - March 19	\$ 60.93

\$ 3,778.68