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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

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

Date: October 23, 2020
 Time: 10:30 a.m.
 Ctrm: 10A
 Judge: Hon. Josephine L. Staton

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1 Krista L. Freitag ("Receiver"), the Court-appointed permanent receiver for
 2 Impetus Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of
 3 their subsidiaries, affiliates, successors and assigns, and any other entity that has
 4 conducted any business related to Defendants' student debt relief enterprise,
 5 including but not limited to Capital Sun Investments, LLC (d/b/a Studora) or Premier
 6 Capital Investments, LLC, and Jimmy Calderon (when conducting activities in
 7 relation to any of the foregoing entities) (the "Receivership Entities"), hereby submits
 8 this final application for approval and payment of fees and reimbursement of
 9 expenses ("Application"). This Application covers the period from July 1, 2019,
 10 through June 26, 2020 ("Final Application Period"), and seeks interim approval of
 11 \$3,950.55 in fees and \$464.88 in expenses and an order authorizing the Receiver to
 12 pay, on an interim basis, 100% of the fees incurred and 100% of expenses incurred.

13 This application and the application of Allen Matkins filed concurrently
 14 herewith will be the last fee applications the Receiver and Allen Matkins file. The
 15 Receiver filed her motion to conclude the receivership and her final report and
 16 accounting ("Motion to Conclude") on June 26, 2020 (Dkt. No. 136). This
 17 application, therefore, seeks final approval of (a) the 20% previously held back from
 18 the Receiver's three interim fee applications, which amount totals \$16,660.35,
 19 (b) final approval of the Receiver's three interim fee applications and of the
 20 \$75,912.44 (\$66,641.40 of fees and \$9,271.04 of expenses) previously paid in
 21 connection with those applications, (c) \$4,415.43 for unpaid fees and costs incurred
 22 during the period from July 1, 2019 through June 26, 2020 (presented herein), and (c)
 23 up to \$3,600 in projected fees and costs to complete the remaining tasks laid out in
 24 the Motion to Conclude.¹

25
 26
 27 ¹ This estimate of fees for remaining work assumes that the Motion to Conclude
 28 will be unopposed and approved by the Court without a hearing. If either turns
 out not to be the case, an adjustment to the estimate may need to be made.

1 **I. INTRODUCTION**

2 This receivership involves several entities which, acting alone or in concert
 3 with others, purportedly advertised, marketed, offered to provide, provided, offered
 4 for sale or sold student loan debt relief services to consumers throughout the United
 5 States; such conduct is at the heart of the action filed by the Federal Trade
 6 Commission ("Commission"). Based on the evidence presented by the Commission,
 7 the Court found good cause to appoint the Receiver on a temporary basis via the Ex
 8 Parte Temporary Restraining Order with Asset Freeze, Appointment of Temporary
 9 Receiver, Limited Expediated Discovery, and Order to Show Cause Why
 10 Preliminary Injunction Should Not Issue (the "TRO") entered on November 13, 2018
 11 (Dkt. No. 23), and on a permanent basis via the Preliminary Injunction Order entered
 12 on November 29, 2018 (Dkt. No. 38), and the Superseding Second Preliminary
 13 Injunction with Asset Freeze, Appointment of Receiver, and Other Equitable Relief
 14 (Dkt. No. 68), which modified the Preliminary Injunction Order in certain respects.

15 The appointment orders confer broad duties, responsibilities, and powers on
 16 the Receiver, including but not limited to taking exclusive custody, control, and
 17 possession of all assets and documents of the Receivership Entities. The
 18 appointment orders also authorize the Receiver to engage counsel to assist her in the
 19 performance of her duties. The Receiver promptly determined that experienced,
 20 qualified counsel was critical due to the scope and complexity of her duties under the
 21 appointment orders. Accordingly, the Receiver engaged Allen Matkins to assist with
 22 urgent legal issues.

23 This fee application should be read in conjunction with the Receiver's Motion
 24 to Conclude, which describes in detail the Receiver and her counsel's activities
 25 during the pendency of the receivership as well as the Final Application Period.

26 This Application seeks approval of \$3,950.55 in fees for a total of 19.7 hours
 27 worked. The work performed is described task-by-task on Exhibit A and is broken
 28 down into the following categories:

02-General Receivership	\$497.25
04-Reporting	\$2,204.10
05-Operations & Asset Sales	\$1,181.70
06-Claims & Distributions (including Pensioner and Investor communications)	\$67.50
Total Fees	\$3,950.55

During this Final Application Period, the Receiver and her staff primarily (a) responded as necessary to the Commission re: case resolution, (b) monitored mail and handled 1099 distribution, and (c) worked to wrap-up the receivership.

The Receiver has successfully completed her Court-ordered duties, including securing, preserving and protecting the Receivership Entities' assets and investigating potential additional sources of recovery, operations and records and should be compensated for her work.

The Receiver has filed detailed reports on her activities on a quarterly basis² throughout the case. The Receiver has also filed interim fee applications on a quarterly basis³ throughout the case, which included a voluntary hold back of 20% of fees incurred from each application. All of the Receiver's interim fee applications have been granted. Finally, the Receiver filed her Motion to Conclude which lays out the tasks remaining to be completed and her projected fees and costs of \$3,600.00 for such work.

Accordingly, the Receiver respectfully requests approval and authority to pay (a) fees and costs incurred during the Final Application period of \$3,950.55 and

² As the receivership was winding down, the Receiver preserved estate resources and did not file quarterly reports as there was not much to report.

³ As the receivership was winding down, the Receiver preserved estate resources and did not file quarterly fee applications as the fee and cost amounts incurred were relatively small.

\$464.88, (b) fees held back from her three interim fee applications of \$16,660.35, and (c) up to \$3,600.00 in projected fees and costs to complete the remaining tasks laid out in the Motion to Conclude.

II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED DURING THE FINAL APPLICATION PERIOD

A. Categories and Descriptions of Work

1. 02-General Receivership

The Receiver's work in the General Receivership category during the Final Application Period, primarily reflects attention to agency requests and receivership wrap-up. The reasonable and necessary fees for work in this category during the Final Application Period total \$497.25.

2. 04-Reporting

The Receiver's work in this category during the Final Application Period focused on preparing the Receiver's Motion to Conclude and Final Accounting and Report filed on June 26, 2020 (Dkt. No. 136). The reasonable and necessary fees for work in this category total \$2,204.10.

3. 05-Operations & Asset Sales

During the Final Application Period, the Receiver's time in this category primarily includes work to monitor mail and manage general operational matters. The reasonable and necessary fees for work in this category total \$1,181.70.

4. 06-Claims & Distributions

During the Final Application Period, the Receiver's staff corresponded with consumers. The reasonable and necessary fees for work during the Final Application Period in this category total \$67.50.

5. Summary of Expenses Requested for Reimbursement

The Receiver requests the Court approve reimbursement of \$464.88 in out-of-pocket costs. The majority of the expenses incurred are associated with the receivership estate website updates and general operations. The total reasonable and

necessary costs incurred by the Receiver during the Final Application Period are \$464.88 and are broken out by category as follows:

Category	Total
Receivership Website Maintenance	\$255.00
Bond Renewal	\$150.00
Phone/Other Misc.	\$59.88
TOTAL COSTS PAID	\$464.88

III. APPROVAL OF PRIOR INTERIM FEE APPLICATIONS AND PAYMENT OF HOLDBACKS

The Receiver respectfully requests that the Court grant final approval of her three interim fee applications and that the Receiver be authorized to pay the amounts held back from those three interim fee applications as follows:

FEE APPLICATION	FEES INCURRED	INTERIM 80% PAYMENT	20% HOLDBACK
First	\$58,590.00	\$46,872.00	\$11,718.00
Second	\$15,731.55	\$ 12,585.24	\$3,146.31
Third	\$8,980.20	\$7,184.16	\$1,796.04
TOTAL	\$83,301.75	\$66,641.40	\$16,660.35

IV. 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 are committed to the sound discretion of the Court. *See SEC v. Elliot*,

1 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922
2 (11th Cir. 1993)).

3 In allowing fees, a court should consider "the time, labor and skill required,
4 but not necessarily that actually expended, in the proper performance of the duties
5 imposed by the court upon the Receiver, the fair value of such time, labor and skill
6 measured by conservative business standards, the degree of activity, integrity and
7 dispatch with which the work is conducted and the result obtained." *United States v.*
8 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
9 omitted). In practical terms, receiver and professional compensation thus ultimately
10 rests upon the result of an equitable, multi-factor balancing test involving the
11 "economy of administration, the burden that the estate may be able to bear, the
12 amount of time required, although not necessarily expended, and the overall value of
13 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
14 1970). Regardless of how this balancing test is formulated, no single factor is
15 determinative and "a reasonable fee is based [upon] all circumstances surrounding
16 receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp.
17 465, 480 (S.D. Tex. 1974).

18 The Appointment Order confers on the Receiver substantial duties and powers,
19 including to conduct such investigation and discovery as is necessary to locate and
20 account for all receivership assets, take such action as is necessary and appropriate to
21 assume control over and preserve receivership assets, and to employ attorneys and
22 others to investigate and, where appropriate, institute, pursue, and prosecute all
23 claims and causes of action of whatever kind and nature.

24 The Receiver has submitted a detailed fee application which describes the
25 nature of the services rendered, and the identity and billing rate of each individual
26 performing each task. *See* Exhibit A. The Receiver has endeavored to staff matters
27 as efficiently as possible while remaining cognizant of the importance of issues
28

1 presented. The request for fees is based on the Receiver's customary billing rates
2 charged for comparable services provided in other matters, less a 10% discount.

3 The work performed by the Receiver was essential to carrying out the Court-
4 ordered duties. The Receiver and Allen Matkins have worked diligently and
5 efficiently since the Receiver's appointment to preserve and protect the assets and
6 records of the receivership estate and to carry out the Court's orders.

7 **V. CONCLUSION**

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

- 9 1. Approving the Receiver's fees and costs for the receivership in the
10 amount of \$100,588.22, including:
- 11 a. Approval and authority to pay the Receiver's fees and costs of
12 \$3,950.55 and \$464.88 for the Final Application Period;
 - 13 b. Approval, on a final basis, of the Receiver's three interim fee
14 applications (\$75,912.44 paid on an interim basis);
 - 15 c. Approval and authority to pay the fees held back from the
16 Receiver's three interim fee applications in the amount of \$16,660.35;
 - 17 d. Approval and authority to pay the Receiver's projected fees and
18 costs of up to \$3,600.00 to complete the tasks remaining to conclude the
19 receivership; and
- 20 2. For such other and further relief as the Court deems appropriate.

21
22 Dated: June 29, 2019

By: 
KRISTA L. FREITAG, Receiver

23
24 Dated: June 29, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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

EXHIBIT A

EXHIBIT A

FTC v Impetus, et. al.

July 2019 - June 2020 Fees

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009
7/1/2019	Reviewed C. Conners response and followed up with FTC. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25	\$ -	\$ -	\$ -	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -
7/5/2019	Performed unclaimed property search. (.5)	0.5	L. Ryan	\$ 121.50	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ 60.75	\$ -	\$ -	\$ -	\$ -
7/10/2019	Followed up on data request; updated FTC re: same. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25	\$ -	\$ -	\$ -	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -
7/12/2019	Reviewed correspondence from National Data Systems; passed on to FTC. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25	\$ -	\$ -	\$ -	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -
7/22/2019	Reconciled receiver account and prepared vendor payments. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -
7/23/2019	Conferred with Atty Fates re: tax notices. (.2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -
7/23/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
7/24/2019	Prepared receipts and disbursement report for Q2 and reconciled bank accounts. (1.3)	1.3	L. Ryan	\$ 121.50	\$ 157.95	\$ -	\$ -	\$ -	\$ 157.95	\$ -	\$ -	\$ -	\$ -	\$ -
7/25/2019	Prepared draft of fourth interim report. (1.2)	1.2	K. Freitag	\$ 292.50	\$ 351.00	\$ -	\$ -	\$ -	\$ 351.00	\$ -	\$ -	\$ -	\$ -	\$ -
7/25/2019	Corresponded with consumers re the status of the receivership. (.3)	0.3	A. Herren	\$ 225.00	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -
7/30/2019	Finalized review and signed fourth interim report and third interim fee app. (.2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ -	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -
7/30/2019	Reviewed and updated websites for domain renewal. (.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -
7/31/2019	Coordinated document posting to website. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25	\$ -	\$ -	\$ -	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -
8/21/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.5)	0.5	A. Herren	\$ 225.00	\$ 112.50	\$ -	\$ -	\$ -	\$ -	\$ 112.50	\$ -	\$ -	\$ -	\$ -
8/29/2019	Attended call with FTC and Atty Fates re: next steps. (.1)	0.1	K. Freitag	\$ 292.50	\$ 29.25	\$ -	\$ -	\$ -	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -
9/8/2019	Briefly reviewed draft declaration. (.4)	0.4	K. Freitag	\$ 292.50	\$ 117.00	\$ -	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9/11/2019	Reviewed and revised declaration. (.5)	0.5	K. Freitag	\$ 292.50	\$ 146.25	\$ -	\$ 146.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9/12/2019	Finalized revisions to declaration. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9/12/2019	Reviewed text for Impetus report and researched same to revise accordingly. (.4)	0.4	G. Rodriguez	\$ 256.50	\$ 102.60	\$ -	\$ -	\$ -	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ -
9/15/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
9/24/2019	Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.4)	0.4	A. Herren	\$ 225.00	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -
10/7/2019	Prepared vendor payments and reviewed cash for transfer amount. (.2)	0.2	L. Ryan	\$ 121.50	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ 24.30	\$ -	\$ -	\$ -	\$ -
10/28/2019	Reviewed mail and emailed Wyoming secretary of state re receivership. (.3)	0.3	L. Ryan	\$ 121.50	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ 36.45	\$ -	\$ -	\$ -	\$ -
11/4/2019	Conferred with FTC re: default judgments and quarterly report. (.2)	0.2	K. Freitag	\$ 292.50	\$ 58.50	\$ -	\$ 58.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/5/2019	Gathered information and responded to correspondence and responded to vendor letter. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -
11/13/2019	Conferred with Atty Zaro and tax specialist re: tax return options and requirements. (.3)	0.3	K. Freitag	\$ 292.50	\$ 87.75	\$ -	\$ 87.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/16/2019	Reconciled Q3 and prepared receipts and disbursement report. (.9)	0.9	L. Ryan	\$ 121.50	\$ 109.35	\$ -	\$ -	\$ -	\$ 109.35	\$ -	\$ -	\$ -	\$ -	\$ -
12/18/2019	Completed and returned bank form. (.4)	0.4	L. Ryan	\$ 121.50	\$ 48.60	\$ -	\$ -	\$ -	\$ -	\$ 48.60	\$ -	\$ -	\$ -	\$ -
1/9/2020	Prepared Q4 receipts and disbursement and reconciled bank statements. (1.6)	1.6	L. Ryan	\$ 121.50	\$ 194.40	\$ -	\$ -	\$ -	\$ 194.40	\$ -	\$ -	\$ -	\$ -	\$ -
1/28/2020	Worked on and prepared 1099s. (.6)	0.6	L. Ryan	\$ 121.50	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ 72.90	\$ -	\$ -	\$ -	\$ -
3/19/2020	Reconciled bank accounts and updated receipts and disbursement report. (1.0) Prepared vendor payment. (.1)	1.1	L. Ryan	\$ 121.50	\$ 133.65	\$ -	\$ -	\$ -	\$ 121.50	\$ 12.15	\$ -	\$ -	\$ -	\$ -
3/20/2020	Recorded transfer and updated receipts and disbursement report. (.7)	0.7	L. Ryan	\$ 121.50	\$ 85.05	\$ -	\$ -	\$ -	\$ 85.05	\$ -	\$ -	\$ -	\$ -	\$ -
3/23/2020	Researched Wells Fargo account numbers at takeover and subsequently located. (.2)	0.2	L. Ryan	\$ 121.50	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ 24.30	\$ -	\$ -	\$ -	\$ -
6/15/2020	Confirmed accounting, bank balances for Final Report. (.2)	0.2	L. Ryan	\$ 121.50	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ 24.30	\$ -	\$ -	\$ -	\$ -
6/15/2020	Researched box archive and costs estimates for project wrap-up. (.2)	0.2	A. Herren	\$ 225.00	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ 45.00	\$ -	\$ -	\$ -	\$ -
6/15/2020	Prepared final accounting and motion for discharge. (.9)	0.9	K. Freitag	\$ 292.50	\$ 263.25	\$ -	\$ -	\$ -	\$ 263.25	\$ -	\$ -	\$ -	\$ -	\$ -
6/23/2020	Prepared final accounting and motion for discharge. (2.6)	2.6	K. Freitag	\$ 292.50	\$ 760.50	\$ -	\$ -	\$ -	\$ 760.50	\$ -	\$ -	\$ -	\$ -	\$ -
Total July 2019 - June 2020 Fees		19.7			\$ 3,950.55	\$ -	\$ 497.25	\$ -	\$ 2,204.10	\$ 1,181.70	\$ 67.50	\$ -	\$ -	\$ -

						001	002	003	004	005	006	007	008	009
Date	Description of Services	Hours	Personnel	Per Hour	Total Fee									
6/30/2020	Contingency for Accounting Related Wrap-Up. (4.0)	4.0	L. Ryan	\$ 121.50	\$ 486.00	\$ -	\$ -	\$ -	\$ -	\$ 486.00	\$ -	\$ -	\$ -	\$ -
6/30/2020	Contingency for Document, Discharge Communication Related Wrap-Up. (4.0)	4.0	A. Herren	\$ 225.00	\$ 900.00	\$ -	\$ -	\$ -	\$ -	\$ 900.00	\$ -	\$ -	\$ -	\$ -
6/30/2020	Contingency for Final Wrap-Up. (3.0)	4.0	K. Freitag	\$ 292.50	\$ 1,170.00	\$ -	\$ -	\$ -	\$ -	\$ 1,170.00	\$ -	\$ -	\$ -	\$ -
6/30/2020	Contingency for Final Wrap-Up. (1.0)	1.0	G. Rodriguez	\$ 256.50	\$ 256.50	\$ -	\$ -	\$ -	\$ -	\$ 256.50	\$ -	\$ -	\$ -	\$ -
Total Contingency		13.0			\$ 2,812.50	\$ -	\$ -	\$ -	\$ -	\$ 2,812.50	\$ -	\$ -	\$ -	\$ -

Project	Date	Description	Expense
FTC	7/31/2019	Website Updated - July 2019	\$ 170.00
FTC	9/19/2019	Dedicated phone line	\$ 4.99
FTC	9/30/2019	Website Updated - September 2019	\$ 85.00
FTC	10/21/2019	Dedicated phone line	\$ 4.99
FTC	11/5/2019	Bond Renewal	\$ 150.00
FTC	11/20/2019	Dedicated phone line	\$ 4.99
FTC	12/20/2019	Dedicated phone line	\$ 4.99
FTC	1/19/2020	Dedicated phone line	\$ 4.99
FTC	1/30/2020	2019 1099s	\$ 14.97
FTC	2/19/2020	Dedicated phone line	\$ 4.99
FTC	3/19/2020	Dedicated phone line	\$ 4.99
FTC	4/20/2020	Dedicated phone line	\$ 4.99
FTC	5/20/2020	Dedicated phone line	\$ 4.99
		Total Paid	\$ 464.88
FTC	6/20/2020	Dedicated phone line	\$ 4.99
FTC	7/20/2020	Dedicated phone line	\$ 4.99
FTC	8/20/2020	Dedicated phone line	\$ 4.99
FTC	5/31/2020	Storage	\$ 5.38
FTC	6/30/2020	Storage	\$ 5.38
FTC	7/30/2020	Storage	\$ 5.38
FTC	8/30/2020	Storage	\$ 5.38
FTC	8/30/2020	Storage - Remove Boxes	\$ 200.00
FTC	8/30/2020	Website Updated - Final	\$ 85.00
FTC	8/30/2020	Fedex - estimate to ship records	\$ 466.01
		Total Contingency Estimate	\$ 787.50