

1 SULLIVAN HILL LEWIN REZ & ENGEL
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5
6 Attorneys for Krista L. Freitag, Receiver
7
8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 vs.

14 ALVIN R. BROWN, FIRST
CHOICE INVESTMENT, INC.,
15 and ADVANCED CORPORATE
ENTERPRISES, INC., d/b/a A-
16 CORP ENTERPRISES a/k/a
ACORP DEVELOPMENT a/k/a A-
17 CORP INVESTMENT,

18 Defendants.

) CASE NO. CV 13-01629-ABC
) (VBKx)

) **DECLARATION OF**
) **CHRISTOPHER V. HAWKINS IN**
) **SUPPORT OF SECOND**
) **INTERIM APPLICATION FOR**
) **APPROVAL AND PAYMENT OF**
) **FEES AND COSTS OF**
) **SULLIVAN, HILL, LEWIN, REZ**
) **& ENGEL AS RECEIVER’S**
) **COUNSEL**

) Date: January 6, 2014
) Time: 10:00 a.m.
) Ctrm: 680

) United States Courthouse
) Edward R. Roybal Federal Building
) 255 East Temple Street
) Los Angeles, CA 90012-3332

) Judge: Hon. Audrev B. Collins

22 I, Christopher V. Hawkins, hereby declare:

23 1. I am a shareholder of the law firm of Sullivan, Hill, Lewin, Rez & Engel
24 (“Sullivan Hill”), which has been employed as general counsel for Krista L. Freitag in
25 her capacity as the Court-appointed Receiver (“Receiver”) in the instant litigation. I
26 have direct and firsthand knowledge of the facts contained in this declaration, and if
27 called upon as a witness, I could and would competently testify to such facts.

28 2. I have read the above-captioned application.

EXHIBIT A

SULLIVAN, HILL, LEWIN, REZ & ENGEL

HOURLY BILLING RATES

<u>ATTORNEY</u>	<u>RATE</u>	<u>ATTORNEY</u>	<u>RATE</u>
Robert P. Allenby	\$350	Christopher V. Hawkins	\$375
Sandra J. Brower	\$400	James P. Hill	\$495
Madeline Cahill-Boley	\$400	Kenneth C. Jones	\$375
Larry G. Campitiello	\$375	Jeffrey D. Lewin	\$470
Candace M. Carroll	\$400	Joseph L. Marshall	\$470
Jennifer W. Chang	\$185	Kathryn A. Millerick	\$185
Elvira Cortez	\$185	Donald G. Rez	\$450
Jonathan S. Dabbieri	\$425	Christine A. Roberts	\$375
James E. Drummond	\$400	Malcolm B. Roberts	\$225
Timothy C. Earl	\$350	Gary B. Rudolph	\$450
John R. Engel	\$470	Elizabeth E. Stephens	\$375
Cynthia A. Fissel	\$350	Michael A. Zarconi	\$185
Catherine A. Hanna	\$240		

PARALEGALS

Erin A. Barber	\$150	Linda Gubba-Reiner	\$150
Valerie A. Blake	\$135	Jamie N. Vidovich	\$185
Gianna Garcia	\$150		

Bankruptcy Legal Assistant

Probate Legal Assistant

Shelley K. Calderone	\$75	Jennifer L. Saurer	\$50
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Law Clerks \$125 - \$140

Document Clerks \$30 - \$80

SEC V. Brown - Second Interim Fee Application
[Through 9/30/13]

Professional	Rate	16144	fees	16325	fees	16326	fees	16329	fees	16330	fees	16364	fees	16326	TOTAL HOURS	TOTAL FEES	NO CHARGE
																	\$10,660.50 (fee app)
CVH	\$0.00	1.9	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	1.9	\$0.00	\$646
CVH	\$340.00	14.7	\$ 4,998.00	16.5	\$ 5,610.00	3.9	\$ 1,326.00	5.1	\$ 1,734.00	0.0	\$ -	10.7	\$ 3,638.00	\$ -	50.9	\$17,306.00	
JLM	\$423.00	0.3	\$ 126.90		\$ -		\$ -		\$ -		\$ -		\$ -	0	0.3	\$126.90	
LGC	\$340.00	0.0	\$ -		\$ -	0.4	\$ 136.00		\$ -		\$ -	0.3	\$ 102.00	0	0.7	\$238.00	
DGG	\$0.00	0.0	\$ -		\$ -		\$ -	0.0	\$ -	0.0	\$ -		\$ -	\$ -	0.0	\$0.00	
DGG	\$135.00	14.5	\$ 1,957.50	6.6	\$ 891.00	0.5	\$ 67.50	3.1	\$ 418.50	0.0	\$ -	1.8	\$ 243.00	\$ -	26.5	\$3,577.50	
JNV	\$170.00	0.0	\$ -	2.6	\$ 442.00	0.0	\$ -	0.0	\$ -	0.0	\$ -	0.0	\$ -	\$ -	2.6	\$442.00	
TOTAL		31.4	\$ 7,082.40	25.7	\$ 6,943.00	4.8	\$ 1,529.50	8.2	\$ 2,152.50	0.0	\$ -	12.8	\$ 3,983.00	0	82.9	\$21,690.40	\$11,748.50
															53.8	\$17,670.90	

BLENDED RATES

Incl. \$261.65
Excl. \$328.46

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Krista L. Freitag
E 3 Advisors
355 S. Grand Avenue, Ste. 2450
Los Angeles, CA 90071

Invoice 151267
November 7, 2013

Our Matter # 2761-16144 - CVH
Re: SEC v. Brown/Case Administration

For Services Rendered Through September 30, 2013

Current Fees	7,082.40	
Current Disbursements	546.16	
Total Current Charges		7,628.56
Total Due		7,628.56

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
Re: SEC v. Brown/Case Administration
I.D. 2761-16144 - CVH

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Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Christopher V. Hawkins	Shareholder	14.70	340.00	4,998.00
Christopher V. Hawkins	Shareholder	1.90	0.00	0.00
Joseph L. Marshall	Shareholder	0.30	423.00	126.90
D. Gianna Garcia	Paralegal	14.50	135.00	1,957.50
	Totals	31.40		7,082.40

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Case Administration
 I.D. 2761-16144 - CVH

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Fees					
Date	Atty	Description	Hours	Rate	Amount
07/11/13	CVH	Teleconference with Receiver re fee applications, her interview of witness Manny, SEC position on Oregon lawsuit, next steps in case (0.4).	0.40	340.00	136.00
07/15/13	DGG	Review and Revise master service list re. investors letter.	0.20	135.00	27.00
07/16/13	DGG	Update Service list.	0.10	135.00	13.50
07/19/13	CVH	Teleconference with investor Little re status (0.3); teleconference with investor Palmer re status (0.3).	0.60	340.00	204.00
07/22/13	CVH	Teleconference with Receiver re fee applications, Canadian discovery, hiring a private investigator to locate transferees, tomorrow's conference call with SEC counsel (0.3); teleconferences with inquiring investors Khan (0.3), Ahmed (0.3), Bowden (0.1), including review related correspondence (0.2), and draft memorandum re service of Receiver's Reports on inquiring investors (0.2); draft correspondence to Receiver re Ahmed's statements re Rancher's petitioning court to release funds (0.2).	1.60	340.00	544.00
07/23/13	CVH	Teleconference with SEC counsel and Receiver re next steps in case, potential resolution (0.7), including preliminary (0.4) and follow up (0.3) teleconference with Receiver; draft related memorandum (0.3).	1.70	340.00	578.00
07/26/13	CVH	Draft and review correspondence with investor Caldwell re status of case.	0.30	340.00	102.00
07/29/13	CVH	Teleconference with investor Goldsmith re claims procedure.	0.30	340.00	102.00
07/30/13	CVH	Perform legal research re Receiver's duty to file tax returns for entities.	0.80	340.00	272.00
07/30/13	CVH	Telephone conferences with investors Norman, LaFontaine re status, claims process.	0.40	340.00	136.00
07/31/13	CVH	Written and telephone correspondence with investor Norman re status, claims procedure (0.2); draft and review correspondence with Receiver re same (0.1).	0.30	340.00	102.00
08/01/13	CVH	Teleconference with investor Palmer re status, claims procedure.	0.20	340.00	68.00
08/01/13	CVH	Draft and review correspondence with Receiver re Al Brown, asset search, funds recovered from Berkley CA law firm (0.2). Draft and review correspondence with investor Grant re Receiver Reports (0.2).	0.40	340.00	136.00
08/05/13	CVH	Teleconference with investor Johnson re status, claims process.	0.20	340.00	68.00
08/07/13	CVH	Conference with J. Marshall re Receiver's duty to file income tax returns, costs and benefits of apply for exemption (0.2); draft correspondence to Receiver re same (0.1). Teleconference with investor Ahmed re status, claims procedure (0.2); teleconference with investor Darrell re same (0.1).	0.60	340.00	204.00
08/07/13	JLM	Conference with Mr. Hawkins regarding tax return filing	0.30	423.00	126.90

Krista L. Freitag			November 7, 2013		
Re: SEC v. Brown/Case Administration			Invoice 151267		
I.D. 2761-16144 - CVH			Page 4		
Date	Atty	Description	Hours	Rate	Amount
		requirements			
08/08/13	CVH	Teleconference with investor Tyrus re status, claims procedure.	0.20	340.00	68.00
08/08/13	DGG	Draft Schedule of Creditors and create supporting documents thereto with names, addresses, and amounts of claims.	1.50	135.00	202.50
08/09/13	CVH	Teleconference with investor Norm re status, claims procedure.	0.20	340.00	68.00
08/09/13	DGG	Further drafting and revisions of supporting documents of the schedule of creditors with names, addresses, and amounts of claims.	3.50	135.00	472.50
08/12/13	CVH	Prepare schedule of creditor for filing pursuant to local rule 66.	0.20	340.00	68.00
08/12/13	DGG	Draft Schedule of Creditors for Creditors List, First Choice Investments, First Choice Energy Partners, and A Corp spreadsheets.	1.70	135.00	229.50
08/13/13	DGG	finalize Supporting document including redactions for the Schedule of Creditors (.5). Correspondence with C. Hawkins re same. (.1)	0.60	135.00	81.00
08/14/13	CVH	Prepare schedule of creditors for filing pursuant to LR 66-5 (0.3), including draft and review correspondence with Receiver (0.2). Review evidence of defendant Brown's continuing involvement with First Choice Energy Funds (0.2), and draft correspondence to Receiver re same (0.1). Field inquiries from numerous investors (0.3).	1.10	340.00	374.00
08/15/13	CVH	Teleconference with Receiver re inquiry from Canadian investor, tax returns, creditor matrix filing per LR 66 (0.2); prepare matrix for filing (0.4).	0.60	340.00	204.00
08/15/13	DGG	Review and Revise supporting documents to Schedule of Creditors according to Trustee's updated figures.	3.20	135.00	432.00
08/16/13	CVH	Finalize, file and serve creditors matrix pursuant to Local Rule 66-5.	0.30	340.00	102.00
08/16/13	DGG	Update investors lists with current figures per K. Freitag for Schedule of Creditors filing.	3.10	135.00	418.50
08/19/13	CVH	Finalize, file and serve schedule of creditors per local rule 66-5 (0.3).	0.30	340.00	102.00
08/19/13	DGG	Finalize, E-File, and Service schedule of creditors and certificate of service thereon.	0.60	135.00	81.00
08/20/13	CVH	Draft and review correspondence with Receiver re upcoming hearings, Fortenberry's invoking his 5th Amendment rights, location of Donato in Canada, involvement of attorney Nimmer with Al Brown (0.2). Return numerous phone calls from investors inquiring about the case (0.6).	0.80	340.00	272.00
08/21/13	CVH	Return investor inquiry.	0.10	340.00	34.00
08/22/13	CVH	Return investor inquiry (0.2).	0.20	340.00	68.00
08/23/13	CVH	Perform legal research re standards for substantively consolidating entities in receivership (0.7 No Charge).	0.70		

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag	November 7, 2013
Re: SEC v. Brown/Case Administration	Invoice 151267
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Date	Atty	Description	Hours	Rate	Amount
08/26/13	CVH	Teleconference with investor Bertran re status, claims procedure, his recovery of investment via (0.2); review accounting analysis re investors who were paid back (0.2); draft correspondence to Receiver re same (0.2).	0.60	340.00	204.00
08/29/13	CVH	Teleconference with Receiver re investor inquiry, tax returns, Vanatta reply.	0.20	340.00	68.00
09/04/13	CVH	Conference with J. Marshall re Receiver's duty to file tax returns (0.2); teleconferences with accountant Corson (0.3) and Receiver re same (0.2).	0.70	340.00	238.00
09/05/13	CVH	Prepare status report for Monday's hearing (0.4);	0.40	340.00	136.00
09/10/13	CVH	Teleconference with attorney Wilson re case status (.2).	0.20	340.00	68.00
09/13/13	CVH	Teleconference with investor LaFontaine re winding up of receivership.	0.20	340.00	68.00
09/16/13	CVH	Review notice to trade creditors, and draft correspondence to Receiver re same.	0.20	340.00	68.00
09/19/13	CVH	Review various SEC receivership dockets re case closing procedure (1.2 NO CHARGE)	1.20		
09/20/13	CVH	Teleconference with investor Bayliss re status.	0.20	340.00	68.00
09/23/13	CVH	Teleconference with investor B. Lee re status.	0.20	340.00	68.00
Total Fees			31.40		7,082.40

Disbursements

Date	Description	Amount
07/02/13	Postage	2.12
07/12/13	Postage	1.72
07/16/13	Public access to court electronic records-; California Central Bankruptcy Court; Pacer Service Center	0.50
07/16/13	Public access to court electronic records-; California Central District Court; Pacer Service Center	1.80
07/16/13	Public access to court electronic records-; California Central District Court; Pacer Service Center	0.40
07/16/13	Public access to court electronic records-; California Central District Court; Pacer Service Center	12.20
07/16/13	Public access to court electronic records-; California Central District Court; Pacer Service Center	5.40
07/16/13	Public access to court electronic records-; California Central District Court; Pacer Service Center	6.10
07/16/13	Public access to court electronic records-; California Southern District Court; Pacer Service Center	1.60
07/16/13	Postage	1.52
07/16/13	Travel expenses; CVH-Reimburse Mileage re: Hearing at U.S. District	136.07

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Case Administration
 I.D. 2761-16144 - CVH

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Date	Description		Amount
	Court, Los Angeles 7/9/13; Christopher V. Hawkins		
07/17/13	Photocopy	289 @ 0.15	43.35
07/17/13	Postage		27.36
07/23/13	Overnight Delivery; Edward R. Roybal Federal Building 7/2/13; Golden State Overnight		31.50
07/23/13	Overnight Delivery; Edward R. Roybal Federal Building 7/12/13; Golden State Overnight		18.33
08/05/13	Photocopy	332 @ 0.15	49.80
08/05/13	Postage		153.90
08/09/13	Photocopy	2 @ 0.15	0.30
08/09/13	Postage		1.38
08/19/13	Postage		1.32
08/19/13	Postage		0.66
08/22/13	Overnight Delivery; The Honorable Audrey B. Collins 8/5/13; Golden State Overnight		20.99
09/10/13	Overnight Delivery; Honorable Audrey B. Collins, Edward R. Roybal Federal Building and U.S. Court 8/19/13; Golden State Overnight		13.92
09/10/13	Overnight Delivery; Honorable Audrey B. Collins, Edward R. Roybal Federal Building and U.S. Court 8/19/13; Golden State Overnight		13.92
Total Disbursements			546.16

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355 S. Grand Avenue, Ste. 2450
Los Angeles, CA 90071

Invoice 151270
November 7, 2013

Our Matter # 2761-16329 - CVH
Re: SEC v. Brown/Asset Analysis and Recovery

For Services Rendered Through September 30, 2013

Current Fees	2,152.50	
Total Current Charges		2,152.50
Total Due		2,152.50

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
Re: SEC v. Brown/Asset Analysis and Recovery
I.D. 2761-16329 - CVH

November 7, 2013
Invoice 151270
Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Christopher V. Hawkins	Shareholder	5.10	340.00	1,734.00
D. Gianna Garcia	Paralegal	3.10	135.00	418.50
Totals		8.20		2,152.50

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Asset Analysis and Recovery
 I.D. 2761-16329 - CVH

November 7, 2013
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 Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
07/08/13	CVH	Teleconference with Receiver re former employee of defendants who may cooperate.	0.20	340.00	68.00
07/15/13	CVH	Review correspondence from investors threatening to sue Receiver for return of \$182k (0.2); written and telephone correspondence with Receiver re same (0.4); perform legal research re leave of court required to sue federal court receiver (0.7 NO CHARGE); draft reply to investors (0.6).	1.20	340.00	408.00
07/16/13	CVH	Draft reply to FCEP investors threatening to sue Receiver for recovery of \$182k in Colorado funds (.6), including written and telephone correspondence with Receiver (.4); follow up teleconference with investor LaFontaine (.2).	1.20	340.00	408.00
07/17/13	CVH	Draft and review correspondence with Receiver re serving copy of Preliminary Injunction on FCEP investors threatening to sue Receiver (0.3); attend to service of preliminary injunction on investors threatening to sue Receiver (0.2); teleconference with investor LaFontaine re my letter to him of yesterday (0.2).	0.70	340.00	238.00
07/23/13	CVH	Teleconference with investor LaFontaine re investor challenges to receivership (0.3); written and telephone follow up correspondence with Receiver (0.4).	0.70	340.00	238.00
07/25/13	CVH	Teleconference with attorney Geron (on behalf of FCEP investors) re status of case (0.3).	0.30	340.00	102.00
08/05/13	CVH	Draft demand for information to third parties receiving large sums from receivership entities (0.3), and draft and review correspondence with Receiver re same (0.2). Draft and review correspondence with Receiver re assets and business of Advances Concepts Enterprises, Inc. (0.3).	0.80	340.00	272.00
08/15/13	DGG	Research and Review over 100 pgs. of real property transactions in order to find assets for A. Brown and D. Brown.	2.50	135.00	337.50
08/28/13	DGG	Further Weslaw research regarding assets of Alvin and Debra Brown (.5). Correspondence with C. Hawkins re. same. (.1)	0.60	135.00	81.00
Total Fees			8.20		2,152.50

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Los Angeles, CA 90071

Invoice 151268
November 7, 2013

Our Matter # 2761-16325 - CVH
Re: SEC v. Brown/Interim Reports

For Services Rendered Through September 30, 2013

Current Fees	6,943.00	
Total Current Charges		6,943.00
Total Due		6,943.00

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
Re: SEC v. Brown/Interim Reports
I.D. 2761-16325 - CVH

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Invoice 151268
Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Christopher V. Hawkins	Shareholder	16.50	340.00	5,610.00
D. Gianna Garcia	Paralegal	6.60	135.00	891.00
Jamie N. Vidovich	Paralegal	2.60	170.00	442.00
	Totals	25.70		6,943.00

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Interim Reports
 I.D. 2761-16325 - CVH

November 7, 2013
 Invoice 151268
 Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
07/01/13	CVH	Review, revise, finalize, file and serve Receiver's Report re accounting (1.2) and exhibits thereto (0.7), and draft and review correspondence with SEC counsel (0.2) and extensive written and telephone correspondence with Receiver (0.9) re same. Review correspondence from Beverly Hills landlord re application of security deposit, return of balance, allegations of continuing liability (0.2); draft correspondence to Receiver re same (0.1).	3.30	340.00	1,122.00
07/01/13	JNV	Review and revise Receiver's Report (.7); confer with D. Garcia re filing and service of same (.2).	0.90	170.00	153.00
07/01/13	DGG	Review, Multiple Revisions, and Prepare filing of Receiver's 2Q13 Report and Exhibit's thereon. (3.1) Draft Certificate thereon (.5) Prepare Service of Mandatory Chambers Copies according to Local Rules and GSO overnight service thereof. (1.5 No Charge) Prepare email service re same (.3) Prepare mail service of same (.3) Electronically format and file Report, exhibits, and COS. (.5)	4.70	135.00	634.50
07/11/13	DGG	Draft Certificate of Service regarding redacted exhibits A-E pursuant to court order.	0.30	135.00	40.50
07/11/13	DGG	Redact personal identifying material from Exhibits pursuant to court orders.	0.30	135.00	40.50
07/12/13	DGG	File Exhibits and Certificate of Service thereon for First Interim Report pursuant to Court Orders. (.2) Prepare service of same. (1.1)	1.30	135.00	175.50
07/30/13	CVH	Review and revise Interim Receivers Report re recommendation for case closure (0.7), including teleconference with Receiver (0.3).	2.00	340.00	680.00
08/22/13	CVH	Revise Receiver's Report and Recommendations (0.5).	0.50	340.00	170.00
08/23/13	CVH	Analyze accounting for purposes of drafting Receiver's recommendations (0.8); teleconference with Receiver re same (0.3); draft Receiver's recommendations (0.9). Draft correspondence to Receiver re same (0.2).	1.30	340.00	442.00
09/04/13	CVH	Draft pleading re wrap up of receivership (1.2), including teleconferences with Receiver (0.4) and investor LaFontaine (0.2).	1.80	340.00	612.00
09/10/13	CVH	Draft Receiver's recommendations re claim and distribution procedure (2.5), including teleconferences with Receiver (.3) and SEC counsel (.2).	3.00	340.00	1,020.00
09/17/13	CVH	Draft Receiver's Report and Request for Instructions re Winding up of Receivership.	1.90	340.00	646.00
09/19/13	JNV	Prepare proof of claim form for claims resolution/winding up procedures.	1.70	170.00	289.00
09/19/13	CVH	Draft Receiver's Report and Request for Instructions re Claim and	2.70	340.00	918.00

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag Re: SEC v. Brown/Interim Reports I.D. 2761-16325 - CVH			November 7, 2013 Invoice 151268 Page 4		
Date	Atty	Description	Hours	Rate	Amount
		Distribution Process (2.3), including teleconference with Receiver (0.4).			
Total Fees			25.70		6,943.00

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Invoice 151269
November 7, 2013

Our Matter # 2761-16326 - CVH
Re: SEC v. Brown/Discovery

For Services Rendered Through September 30, 2013

Current Fees	1,529.50	
Total Current Charges		1,529.50
Total Due		1,529.50

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Discovery
 I.D. 2761-16326 - CVH

November 7, 2013
 Invoice 151269
 Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Christopher V. Hawkins	Shareholder	3.90	340.00	1,326.00
Larry G. Campitiello	Shareholder	0.40	340.00	136.00
D. Gianna Garcia	Paralegal	0.50	135.00	67.50
Totals		4.80		1,529.50

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag	November 7, 2013
Re: SEC v. Brown/Discovery	Invoice 151269
I.D. 2761-16326 - CVH	Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
07/03/13	CVH	Work on discovery of bank records in Canada.	0.30	340.00	102.00
07/04/13	LGC	Email correspondence with Toronto Meritas affiliate re estimate of cost to process letters rogatory in Canada.	0.10	340.00	34.00
07/09/13	CVH	Conference with Receiver re response from Manny Nedwick to Receiver's request for information (.3); evaluate cost estimate from Canadian counsel to prosecute letters rogatory, solicit inquiries for alternative from various attorneys (.3).	0.60	340.00	204.00
07/11/13	CVH	Work on obtaining second estimate for costs of letters rogatory in Canada.	0.30	340.00	102.00
07/11/13	LGC	Telephone conference and email correspondence with attorney Alison Bauer re possible assistance with processing of letters rogatory in Canada.	0.30	340.00	102.00
07/17/13	CVH	Teleconference with Receiver re cost estimates for letters rogatory in Canada discovery, upcoming conference call with SEC re next steps in case (0.3).	0.30	340.00	102.00
08/12/13	CVH	Draft correspondence to Canadian counsel re discovery (0.1). Draft and review correspondence with CIBC fraud department re status of case (0.1).	0.20	340.00	68.00
08/20/13	CVH	Teleconference with Royal Canadian Mounted Policy Sergeant re securities fraud investigation against Al Brown under way in Canada (0.3); draft follow up correspondence (0.2); attention to assets search re Al Brown and wife (0.2).	0.70	340.00	238.00
08/22/13	CVH	Draft and review correspondence with Royal Canadian Mounted Police re its securities fraud investigation of Al Brown (0.2). Written and telephone correspondence with Receiver re foregoing (0.4).	0.60	340.00	204.00
08/23/13	CVH	Review and analyze Al Brown asset search (0.3). Teleconference with Royal Canadian Mounted Police Sergeant investigating ACorp in Canada (0.3), draft follow up correspondence (0.3).	0.90	340.00	306.00
08/23/13	DGG	Research and Analyze Property assets of Alvin Brown.	0.50	135.00	67.50
Total Fees			4.80		1,529.50

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Krista L. Freitag
E 3 Advisors
355 S. Grand Avenue, Ste. 2450
Los Angeles, CA 90071

Invoice 151272
November 7, 2013

Our Matter # 2761-16364 - CVH
Re: SEC v. Brown/Vannatta Litigation

For Services Rendered Through September 30, 2013

Current Fees	3,983.00	
Total Current Charges		3,983.00
Total Due		3,983.00

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Vannatta Litigation
 I.D. 2761-16364 - CVH

November 7, 2013
 Invoice 151272
 Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Christopher V. Hawkins	Shareholder	10.70	340.00	3,638.00
Larry G. Campitiello	Shareholder	0.30	340.00	102.00
D. Gianna Garcia	Paralegal	1.80	135.00	243.00
Totals		12.80		3,983.00

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/Vannatta Litigation
 I.D. 2761-16364 - CVH

November 7, 2013
 Invoice 151272
 Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
07/10/13	CVH	Review correspondence from Oregon attorney re his intent to seek relief from injunction to prosecute claims in Oregon state court (0.2); teleconference with SEC counsel re same (0.3); draft follow up correspondence to Receiver re foregoing (0.2).	0.70	340.00	238.00
07/11/13	CVH	Analyze Vanatta motion for leave from injunction to proceed in Oregon state court (0.4); extensive telephone correspondence with Oregon counsel and SEC counsel re same (1.5); analyze conflicting interests between local rules requiring service on all investors, and Judge's order not to publish addresses of investors (0.3), and draft correspondence to Receiver re same (0.3).	2.50	340.00	850.00
07/12/13	LGC	Email correspondence with Canadian counsel re possible assistance processing US letters rogatory in Canada.	0.30	340.00	102.00
07/16/13	CVH	Review correspondence re ongoing discussions with Vanatta counsel attempting to consensually resolve that matter (0.1).	0.10	340.00	34.00
07/25/13	CVH	Teleconference with Vanatta counsel re his intent to proceed with motion to intervene, motion to seek priority treatment (0.2).	0.20	340.00	68.00
08/05/13	CVH	Review Vanatta motion to intervene (0.3), and draft correspondence to SEC counsel re same (0.1).	0.40	340.00	136.00
08/12/13	CVH	Draft and review correspondence with SEC counsel re opposition to Van Atta motion (0.2).	0.20	340.00	68.00
08/13/13	CVH	Draft opposition to Van Atta motion to intervene, motion for relief from stay to proceed in Oregon court (3.1). Teleconference with Receiver re report, recommendations, options (0.3).	3.40	340.00	1,156.00
08/14/13	CVH	Draft opposition to Vanatta motion to intervene (0.7), including draft and review correspondence with Receiver (0.4) and SEC counsel (0.1).	1.20	340.00	408.00
08/19/13	CVH	Finalize, file and serve opposition to motion to intervene (0.5), including draft and review correspondence with Receiver (0.3) and SEC counsel (0.2). Review SEC joinder in opposition to motion to intervene (0.2).	1.20	340.00	408.00
08/19/13	DGG	Draft, review, and finalize Declaration of K. Freitag in support of Opposition to Motion of Frank Vanatta to Intervene. (.6) Draft Certificate of Service thereon (.4) Electronically file Opposition, Declaration, and Certificate of Service. (.3) Prepare service thereon. (.6)	1.80	135.00	243.00
08/28/13	CVH	Review Vanatta reply re motion to intervene, and draft correspondence to SEC counsel re same.	0.40	340.00	136.00
09/05/13	CVH	Review court order denying Vanatta motion to intervene (0.2); written and telephone correspondence with Receiver re same (0.2).	0.40	340.00	136.00
Total Fees			12.80		3,983.00

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355 S. Grand Avenue, Ste. 2450
Los Angeles, CA 90071

Invoice 151271
November 7, 2013

Our Matter # 2761-16330 - CVH
Re: SEC v. Brown/ Fee Applications

For Services Rendered Through September 30, 2013

Current Fees	10,660.50	
Total Current Charges		10,660.50
Total Due		10,660.50

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag
 Re: SEC v. Brown/ Fee Applications
 I.D. 2761-16330 - CVH

November 7, 2013
 Invoice 151271
 Page 2

Fee Recap

		Hours	Rate/Hour	Amount
Christopher V. Hawkins	Shareholder	18.90	340.00	6,426.00
D. Gianna Garcia	Paralegal	25.70	135.00	3,469.50
D. Gianna Garcia	Paralegal	0.40	0.00	0.00
Jamie N. Vidovich	Paralegal	4.50	170.00	765.00
Totals		49.50		10,660.50

Sullivan, Hill, Lewin, Rez & Engel

Krista L. Freitag	November 7, 2013
Re: SEC v. Brown/ Fee Applications	Invoice 151271
I.D. 2761-16330 - CVH	Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
07/03/13	CVH	Draft fee application of Sullivan Hill (3.7) and Receiver (1.2).	4.90	340.00	1,666.00
07/03/13	DGG	Correspondence with Receiver re. Report filed on 7/1/13.	0.20	135.00	27.00
07/08/13	CVH	Prepare fee applications of Sullivan Hill (1.5) and Receiver (0.8).	2.30	340.00	782.00
07/08/13	DGG	Further Draft Declaration of Christopher V. Hawkins in support of Fee Application. (.6)	0.60	135.00	81.00
07/09/13	DGG	Review and Calculate Attorney fees and costs breakdown on spreadsheet. (.8) Revise and Review SHLRE First Interim Fee Application according to breakdown. (.8)	1.60	135.00	216.00
07/10/13	CVH	Draft declaration supporting Sullivan Hill fee application (1.3). Draft Receiver's fee application (0.8).	2.10	340.00	714.00
07/10/13	DGG	Review and Revise Sullivan Hill's First Interim Application for Compensation. (1.1)	1.10	135.00	148.50
07/11/13	DGG	Draft, Review, and Revise Notice of Hearing re the First Interim Application for Approval of Fees and Costs for SHLRE.	0.80	135.00	108.00
07/23/13	CVH	Prepare fee applications, notices, declarations for Sullivan Hill (0.4) and Receiver (0.4).	0.80	340.00	272.00
07/23/13	DGG	Further Revise Notice of Hearing for Sullivan Hill's First Interim Fee Application.	0.30	135.00	40.50
07/23/13	DGG	Draft Notice of Hearing on Krista Freitag's First Interim Fee Application.	0.70	135.00	94.50
07/23/13	DGG	Further revise Declaration of C. Hawkins in support of Sullivan Hill's First Interim Fee Application. (.4)	0.40	135.00	54.00
07/23/13	DGG	Draft Proposed Order on Sullivan Hill's First Interim Fee Application.	0.70	135.00	94.50
07/23/13	DGG	Draft Proposed Order on Krista Freitag's First Interim Fee Application. (.7)	0.70	135.00	94.50
07/23/13	DGG	Prepare supporting documents to the Declaration of C. Hawkins in support of Sullivan Hill's First Interim Fee Application.	1.10	135.00	148.50
07/23/13	DGG	Draft Declaration of K. Freitag in support of K. Freitag, Receiver's First Interim Fee Application.	1.50	135.00	202.50
07/24/13	DGG	Draft Certificate of Service for both Sullivan Hill and K. Freitag's Fee Applications. (.5)	0.50	135.00	67.50
07/24/13	DGG	Draft Certificate of Service for the Notice of Hearings regarding both Sullivan Hill and K. Freitag's Fee Applications. (.5)	0.50	135.00	67.50
07/24/13	DGG	Review and Revise the Declaration of the Receiver.	0.40	135.00	54.00
07/24/13	DGG	Review and Revise Notice of Hearing of the Receiver.	0.10	135.00	13.50
07/24/13	DGG	Format Exhibits to Sullivan Hill declaration according to Local Rules.	0.40	135.00	54.00
07/25/13	CVH	Review and revise Receiver's fee application (0.9), including	1.30	340.00	442.00

Krista L. Freitag		November 7, 2013			
Re: SEC v. Brown/ Fee Applications		Invoice 151271			
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Date	Atty	Description	Hours	Rate	Amount
		teleconference with Receiver (0.4).			
07/25/13	JNV	Confer with D. Garcia re status of interim fee applications, submission to SEC.	0.30	170.00	51.00
07/25/13	DGG	Review and Revise Proposed Order of Receiver.	0.20	135.00	27.00
07/25/13	DGG	Review of Receivers Fee Application and prepare supporting documents.	0.50	135.00	67.50
07/26/13	CVH	Prepare fee applications and supporting documents of Sullivan Hill (1.3) and Receiver (1.3), including written and telephone correspondence with Receiver (0.5), and draft and review correspondence with SEC counsel (0.3).	3.40	340.00	1,156.00
07/26/13	JNV	Review, revise and finalize SHLRE first interim fee application, supporting declaration of C. Hawkins and all exhibits thereto (2.2); Review, revise and finalize K. Freitag fee application, declaration in support and exhibits thereto (2.0).	4.20	170.00	714.00
07/29/13	CVH	Attention to hearing date on fee applications.	0.30	340.00	102.00
07/30/13	CVH	Draft and review correspondence with SEC counsel re SEC approval of fee application.	0.20	340.00	68.00
08/01/13	CVH	Draft and review correspondence with SEC counsel re SEC approval of fee applications of Receiver and counsel; draft memorandum re scope of service.	0.30	340.00	102.00
08/01/13	DGG	Revise Sullivan Hill's Fee Application according to SEC recommendations. (.4 No Charge)	0.40		
08/02/13	CVH	Finalize fee applications of Receiver (0.7) and Sullivan Hill (0.7).	1.40	340.00	476.00
08/02/13	DGG	Further review, revise, and prepare Sullivan Hill and Receivers Fee applications and supporting documents for filing.	5.50	135.00	742.50
08/05/13	CVH	Finalize, file and serve fee application of Receiver (0.4) and Sullivan Hill (0.4), including analyze scope of service required (0.4), and draft and review correspondence with Receiver re same (0.3).	1.50	340.00	510.00
08/05/13	DGG	Further review, revise, and prepare Sullivan Hill and Receivers Fee applications and supporting documents for filing. (2.5) Prepare Certificates of Service for the Fee Applications and the Notices of Hearing (2.2) Electronically file (2) fee applications, (2) declarations, (2) Notices of Hearing and Certificates of Service thereon (.9) Prepare mail and electronic service of the Notices of Hearing and the Fee Applications (2.0)	7.60	135.00	1,026.00
08/09/13	DGG	Correspondence with Receiver re Final Sullivan Hill/Receiver Fee Applications.	0.10	135.00	13.50
09/05/13	CVH	Review court order granting fee applications (0.2); written and telephone correspondence with Receiver re same (0.2).	0.40	340.00	136.00
09/05/13	DGG	Draft Fee Application Breakdown Spreadsheet. (.2)	0.20	135.00	27.00
Total Fees			49.50		10,660.50

EXHIBIT C

EXHIBIT C

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SECOND INTERIM FEE APPLICATION

EXPENSE SUMMARY – JULY 1, 2013 THROUGH SEPTEMBER 30, 2013

COST/EXPENSE DESCRIPTION	AMOUNT
Legal Services – Fax, Copy @ \$.15 per pg.	\$93.45
PACER	\$28.00
Overnight Delivery	\$98.66
Postage	\$189.98
Travel Expenses	\$137.07
Totals	\$546.16