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7 THOMAS C. HEBRANK

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10
11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 v.

14 LOUIS V. SCHOOLER and FIRST
15 FINANCIAL PLANNING
CORPORATION d/b/a WESTERN
16 FINANCIAL PLANNING
CORPORATION,

17 Defendants.
18

Case No. 3:12-cv-02164-GPC-JMA

**DECLARATION OF GENO
RODRIGUEZ IN SUPPORT OF
RESPONSE TO OPPOSITION TO
SEVENTH INTERIM FEE
APPLICATIONS OF THE
RECEIVER AND HIS COUNSEL**

Date: August 8, 2010
Time: 1:30 p.m.
Ctrm.: 9
Judge: Hon. Gonzalo P. Curiel

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1 I, Geno Rodriguez, declare:

2 1. I am a Director at E3 Advisors, the company of Thomas C. Hebrank,
3 the Court-appointed receiver for First Financial Planning Corporation d/b/a Western
4 Financial Planning Corporation ("Western"), and its subsidiaries and affiliates
5 (collectively, "Receivership Entities").

6 2. I make this declaration in support of the Receiver's Response to
7 Opposition to Seventh Interim Fee Applications of the Receiver and His Counsel. I
8 have personal knowledge of the facts stated herein, and if called upon to do so, I
9 could and would personally and competently testify to them.

10 3. I have reviewed the e-mail dated February 15, 2014 from Robert
11 Schafer to Louis Schooler in which Mr. Schafer claims the Receiver had not made
12 any payments to him for December, January, or February 2014. That statement is
13 wrong. In fact, note payments were made to Mr. Schafer and cashed by him in each
14 of those months.

15 4. On June 18, 2014, Mr. Schafer called and spoke to the Receiver, who
16 asked that I return his call. Mr. Schafer claimed the Receiver had not made any
17 payments to him in 2014. I called Mr. Schafer and left him a voicemail message
18 explaining that all of the required note payments had been made and cashed by him.
19 On July 9, 2014, Mr. Schafer returned my call and left me a voicemail message
20 acknowledging receipt of "most" note payments, without any explanation of which
21 payments were not received. The bank statements for Western's accounts confirm
22 that all required note payments were made to Mr. Schafer and cashed by him.

23 I declare under penalty of perjury under the laws of the United States that the
24 foregoing is true and correct.

25 Executed this 1st day of August, 2014, at San Diego, California.

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GENO RODRIGUEZ