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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 SECURITIES AND EXCHANGE  
11 COMMISSION,

12 Plaintiff,

13 v.

14 PACIFIC WEST CAPITAL GROUP,  
INC.; ANDREW B CALHOUN IV;  
15 PWCG TRUST; BRENDA CHRISTINE  
BARRY; BAK WEST, INC.;  
16 ANDREW B CALHOUN JR.; ERIC  
CHRISTOPHER CANNON; CENTURY  
17 POINT, LLC; MICHAEL WAYNE  
DOTTA; and CALEB AUSTIN  
18 MOODY (dba SKY STONE),

19 Defendants.  
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Case No. 2:15-cv-02563-FMO (FFMx)

**NINTH INTERIM APPLICATION  
FOR APPROVAL AND PAYMENT  
OF FEES AND COSTS TO  
THOMAS C. HEBRANK, AS  
RECEIVER**

Date: August 17, 2020  
Time: 10:00 a.m.  
Ctvm.: 9C  
Judge: Hon. Dean D. Pregerson

1 Thomas C. Hebrank ("Receiver"), the Court-appointed receiver for PWCG  
2 Trust, hereby submits this ninth interim application for approval and payment of fees  
3 and reimbursement of expenses ("Application"). This Application covers the period  
4 from January 1, 2020 through March 31, 2020 ("Application Period"), and seeks  
5 interim approval of \$23,616.45 in fees and \$2,105.89 in expenses, and an order  
6 authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred  
7 (\$18,893.16) and 100% of expenses incurred.

8 Detailed descriptions of the services rendered are contained in Exhibit A  
9 attached hereto. Exhibit B is a chart reflecting the hours and fees billed to each  
10 category of services on a monthly basis during the Application Period. Exhibit C is a  
11 summary of the out-of-pocket costs. During the Application Period, the Receiver  
12 and his staff have spent 106.8 hours at an overall blended billing rate of \$221.13  
13 per hour. The Receiver has discounted all fees by ten percent (10%) from regular  
14 hourly billing rates. The financial status of the receivership estate during the  
15 Application Period is reflected in the Receiver's Eighth and Ninth Interim Reports  
16 filed on March 12 and June 2, 2020.

#### 17 **I. FEE APPLICATION**

18 The Receiver's work during the Application Period falls into the following  
19 categories:

- 20 A. General Receivership
- 21 B. Asset Investigation & Recovery
- 22 C. Reporting
- 23 D. Operations & Asset Sales
- 24 E. Claims & Distributions
- 25 F. Legal Matters & Pending Litigation

**A. General Receivership**

This category includes time spent by the Receiver on (a) communications with numerous parties, including Plaintiff, Defendant, and Mills Potoczak; (b) review of filings, follow up, and posting to the receivership website; (c) various investor communications including case updates, questions on their individual investments, changes in contact information, etc.; and (d) other administrative items.

| Name             | Title         | Rate     | Hours | Fees       |
|------------------|---------------|----------|-------|------------|
| T. Hebrank       | Receiver      | \$292.50 | 11.7  | \$2,398.50 |
| G. Rodriguez     | Mng. Director | \$256.50 | .2    | \$51.30    |
| A. Herren        | Investor Rel. | \$121.50 | 31.2  | \$3,790.80 |
| TOTAL            |               |          | 43.1  | \$6,240.60 |
| Avg. Hourly Rate |               | \$144.79 |       |            |

**B. Asset Investigation & Recovery**

None

**C. Reporting**

This category contains time spent by the Receiver preparing reports for the Court as well as monthly case updates to the investors. Specifically, during this period, the Receiver assisted with the preparation, review and revision of the Receiver's Motion for Approval of Procedures for the Administration of Claims filed on January 10, 2020, the Stipulation Regarding Removal of Mills Potoczak & Company as Trustee of PWCG Trust and Appointment of Receiver as Substitute Trustee filed on February 11, 2020, and the Receiver's Eighth Interim Report and Recommendations filed on March 12, 2020.

| Name             | Title         | Rate     | Hours | Fees       |
|------------------|---------------|----------|-------|------------|
| T. Hebrank       | Receiver      | \$292.50 | 8.5   | \$2,486.25 |
| G. Rodriguez     | Mng. Director | \$256.50 | .3    | \$76.95    |
| A. Herren        | Investor Rel. | \$121.50 | 1.7   | \$206.55   |
| TOTAL            |               |          | 10.5  | \$2,769.75 |
| Avg. Hourly Rate |               | \$263.79 |       |            |

**D. Operations & Asset Sales**

The Receiver's work in this category relates to (a) meetings and calls with the parties, including counsel for the Securities and Exchange Commission, Mills Potoczak, and itm/21<sup>st</sup>; (b) review of files, software, databases and schedules relating to investors, premium payments; (c) preparing and reviewing cash projections and needs; (d) management and oversight of premium payment process; and (e) the Trustee transition from Mills Potoczak to the Receiver.

| Name             | Title         | Rate     | Hours | Fees       |
|------------------|---------------|----------|-------|------------|
| T. Hebrank       | Receiver      | \$292.50 | 25.6  | \$7,488.00 |
| A. Herren        | Investor Rel. | \$121.50 | 3.6   | \$437.40   |
| TOTAL            |               |          | 29.2  | \$7,925.40 |
| Avg. Hourly Rate |               | \$271.42 |       |            |

**E. Claims & Distributions**

This category includes time spent by the Receiver beginning work on the preparation of investor claims schedule and analysis. The process required a very detailed review of investor activity from various schedules showing initial policy investments, capital call contributions, distributions upon maturity, and any transfers of investments, each on a policy by policy basis. This analysis will provide the foundation for the review and determination of investor claims and resolution of any claim disputes.

| Name             | Title         | Rate     | Hours | Fees       |
|------------------|---------------|----------|-------|------------|
| T. Hebrank       | Receiver      | \$292.50 | 5.0   | \$1,462.50 |
| G. Rodriguez     | Mng. Director | \$256.50 | .8    | \$205.20   |
| V. Liguzinski    | Forensic Acct | \$225.00 | 4.6   | \$1,035.00 |
| TOTAL            |               |          | 10.4  | \$2,702.70 |
| Avg. Hourly Rate |               | \$259.88 |       |            |

**F. Legal Matters & Pending Litigation**

This category includes time spent by the Receiver on legal matters and pending litigation. During the Application Period, the Receiver attended a Court hearing on January 13, 2020, responded to a subpoena to produce documents and sit

1 for a deposition issued by the remaining defendants in the case, and responded to  
2 BroadRiver claims and information requests.

| 3 Name             | Title    | Rate     | Hours | Fees       |
|--------------------|----------|----------|-------|------------|
| 4 T. Hebrank       | Receiver | \$292.50 | 13.6  | \$3,978.00 |
| 5 TOTAL            |          |          | 13.6  | \$3,978.00 |
| 6 Avg. Hourly Rate |          | \$292.50 |       |            |

7 **G. Costs**

8 The Receiver requests the Court approve \$2,105.89 in costs. A detailed listing  
9 of each expense is summarized in Exhibit C. The Application Period included the  
10 document shipping charges, as well as monthly costs for the receivership website and  
11 investor mailings.

12 **II. FEES AND COSTS INCURRED AND PAID TO DATE**

13 From inception of the receivership through March 31, 2020, the Receiver  
14 incurred fees and costs of \$254,378.70, of which amount \$50,875.74 is subject to  
15 holdback pending approval of the Receiver's final fee application at the conclusion of  
16 the receivership, \$25,722.34 is awaiting the Court's review and approval, and  
17 \$201,963.88 has been approved by the Court and paid to date. During the same time  
18 period, Allen Matkins has incurred fees and costs of \$613,138.05, of which amount  
19 \$122,627.61 is subject to holdback pending approval of Allen Matkins' final fee  
20 application at the conclusion of the receivership, \$68,078.20 is awaiting the Court's  
21 review and approval, and \$443,621.66 has been approved by the Court and paid to  
22 date. Finally, during the same time period, MPC has incurred fees and costs totaling  
23 \$181,422.77, of which amount \$11,203.40 is awaiting the Court's review and  
24 approval, and \$170,219.37 has been approved by the Court and paid to date.

25 **III. STANDARDIZED FUND ACCOUNTING REPORT**

26 Attached hereto as Exhibit D is a Standardized Fund Accounting Report  
27 covering the time period from January 1, 2020 through March 31, 2020 to coincide  
28 with the end of the Application Period.

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

As a preliminary matter, the Judgment appointing the Receiver confers on the Receiver substantial duties and powers, including to conduct such investigation and discovery as is necessary to locate and account for all receivership assets, take such action as is necessary and appropriate to assume control over and preserve

1 receivership assets, and employ attorneys and others to investigate and, where  
2 appropriate, institute, pursue, and prosecute all claims and causes of action of  
3 whatever kind and nature. *See* Dkt. 145, Section III.

4       The Receiver believes this fee request is fair and reasonable and the fees and  
5 costs incurred were necessary to the administration of the receivership estate. The  
6 Receiver has submitted a detailed fee application which describes the nature of the  
7 services rendered, and the identity and billing rate of each individual performing  
8 each task. *See* Exhibit A. The Receiver's request for compensation is based on his  
9 customary billing rates charged in similar matters, discounted by 10 percent. The  
10 blended hourly rate for all services provided during the Application Period is  
11 \$221.13. The Receiver's billing rates are comparable or less than those charged in  
12 the community on similarly complex matters.

13                                   **V.     CONCLUSION**

14       The Receiver has worked diligently and efficiently in fulfilling his duties and  
15 has provided valuable service in that regard.

16       WHEREFORE, the Receiver requests an order:

17       1.     Approving \$23,616.45 in fees and \$2,105.89 in costs incurred by the  
18 Receiver during the Application Period and authorizing payment on an interim basis  
19 of \$18,893.16 in fees and \$2,105.89 in costs from available receivership estate cash;  
20 and

21       2.     Granting such other and further relief as is appropriate.

22 Dated: July 16, 2020

23                                   By:   
24                                   THOMAS C. HEBRANK,  
25                                   Permanent Receiver  
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# EXHIBIT "A"

SEC - PWCG Trust  
January 2020

| Date      | Description of Services  | Hours | Personnel     | Per Hour  | Total Fee   | Billing Category Allocation |   |     |     |     |     |
|-----------|--|-------|---------------|-----------|-------------|-----------------------------|---|-----|-----|-----|-----|
|           |  |       |               |           |             | A                           | B | C   | D   | E   | F   |
| 1/2/2020  | Correspondence with Atty Fates (.2)  | 0.2   | Hebrank, T.   | \$ 292.50 | \$ 58.50    |                             |   |     |     |     | 0.2 |
| 1/3/2020  | Make premium wire payments, transfer funds (.4) Research uncashed premium payment (.2) Investor correspondence (.2)  | 0.8   | Hebrank, T.   | \$ 292.50 | \$ 234.00   | 0.2                         |   |     | 0.6 |     |     |
| 1/3/2020  | Researched policy payment status; corresponded with ITM and T. Hebrank re same. (.3) Corresponded with one (1) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)  | 0.4   | Herren, A.    | \$ 121.50 | \$ 48.60    | 0.1                         |   | 0.3 |     |     |     |
| 1/5/2020  | Make premium check payments.   | 0.2   | Hebrank, T.   | \$ 292.50 | \$ 58.50    |                             |   |     | 0.2 |     |     |
| 1/5/2020  | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.8) Corresponded with one (1) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)                            | 0.9   | Herren, A.    | \$ 121.50 | \$ 109.35   | 0.1                         |   | 0.8 |     |     |     |
| 1/6/2020  | Correspondence with Attys Zaro and Fates (.5) Prepare SFAR and updates to Receiver's Report (1.6) Create investor claim form (.5) Correspondence on upcoming hearing for investor claim motion (.4)  | 3.0   | Hebrank, T.   | \$ 292.50 | \$ 877.50   |                             |   | 1.6 |     | 0.9 | 0.5 |
| 1/6/2020  | Corresponded with one (1) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)   | 0.1   | Herren, A.    | \$ 121.50 | \$ 12.15    | 0.1                         |   |     |     |     |     |
| 1/7/2020  | Review and respond to claims process motion (.4) Review filing, post to website (.1) Arrange call with itm/21st (.1) Misc correspondence with attnys (.2)  | 0.8   | Hebrank, T.   | \$ 292.50 | \$ 234.00   | 0.1                         |   |     | 0.1 | 0.4 | 0.2 |
| 1/8/2020  | Prepare for and conf call with itm/21st, follow up with Atty Fates (.8) Correspondence with attnys re: hearing and deposition (.4)   | 1.2   | Hebrank, T.   | \$ 292.50 | \$ 351.00   |                             |   |     | 0.8 |     | 0.4 |
| 1/9/2020  | Prepare info for Court hearing (1.0) Conf call with attnys (.9)  | 1.9   | Hebrank, T.   | \$ 292.50 | \$ 555.75   |                             |   |     |     |     | 1.9 |
| 1/10/2020 | Review and execute Claims Motion; post to website (.4) Correspondence on hearing and upcoming deposition and trial (.3)  | 0.7   | Hebrank, T.   | \$ 292.50 | \$ 204.75   |                             |   |     |     | 0.4 | 0.3 |
| 1/13/2020 | Prepare for and attend Court hearing (2.0) Operational correspondence (.3)   | 2.3   | Hebrank, T.   | \$ 292.50 | \$ 672.75   |                             |   |     | 0.3 |     | 2.0 |
| 1/13/2020 | Travel to/from LA for Court hearing.   | 7.0   | Hebrank, T.   | \$ 146.25 | \$ 1,023.75 | 7.0                         |   |     |     |     |     |
| 1/14/2020 | Review and approve premium payments, transfer funds. Set up bank account accesses (.5)   | 0.5   | Hebrank, T.   | \$ 292.50 | \$ 146.25   |                             |   |     | 0.5 |     |     |
| 1/15/2020 | Correspondence with Atty Fates and Atty Zaro (.4)  | 0.4   | Hebrank, T.   | \$ 292.50 | \$ 117.00   |                             |   |     |     |     | 0.4 |
| 1/15/2020 | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.6) Conferred with two (2) and corresponded with two (2) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.7) | 1.3   | Herren, A.    | \$ 121.50 | \$ 157.95   | 0.7                         |   | 0.6 |     |     |     |
| 1/16/2020 | Discussions and updates on upcoming trial.   | 0.3   | Hebrank, T.   | \$ 292.50 | \$ 87.75    |                             |   |     |     |     | 0.3 |
| 1/16/2020 | Conferred with ten (10) and corresponded with twelve (12) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (3.3)  | 3.3   | Herren, A.    | \$ 121.50 | \$ 400.95   | 3.3                         |   |     |     |     |     |
| 1/17/2020 | Multiple correspondence on trial and document production status.   | 0.3   | Hebrank, T.   | \$ 292.50 | \$ 87.75    |                             |   |     |     |     | 0.3 |
| 1/20/2020 | Tax correspondence.  | 0.2   | Hebrank, T.   | \$ 292.50 | \$ 58.50    |                             |   |     | 0.2 |     |     |
| 1/21/2020 | Update call with Atty Fates. Follow up on future transition issues.  | 0.4   | Hebrank, T.   | \$ 292.50 | \$ 117.00   |                             |   |     |     |     | 0.4 |
| 1/21/2020 | Corresponded with one (1) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)   | 0.1   | Herren, A.    | \$ 121.50 | \$ 12.15    | 0.1                         |   |     |     |     |     |
| 1/22/2020 | Prepare and distribute monthly investor case updates (1.1) Correspondence re: administrative and trustee duties. Review detailed billings for duties performed (.8) Correspondence re: BroadRiver (.3)   | 2.2   | Hebrank, T.   | \$ 292.50 | \$ 643.50   |                             |   | 1.1 | 0.8 | 0.3 |     |
| 1/22/2020 | Conferred with one (1) and corresponded with five (5) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.8)   | 0.8   | Herren, A.    | \$ 121.50 | \$ 97.20    | 0.8                         |   |     |     |     |     |
| 1/22/2020 | Coordinated monthly case update. (0.2)   | 0.2   | Rodriguez, G. | \$ 256.50 | \$ 51.30    | 0.2                         |   |     |     |     |     |

|                    |   |             |             |                    |                |            |            |            |            |            |     |
|--------------------|---|-------------|-------------|--------------------|----------------|------------|------------|------------|------------|------------|-----|
| 1/23/2020          | Correspondence on BroadRiver claim and issues.  | 0.4         | Hebrank, T. | \$ 292.50          | \$ 117.00      |            |            |            |            | 0.4        |     |
| 1/24/2020          | Investor and misc correspondence.   | 0.3         | Hebrank, T. | \$ 292.50          | \$ 87.75       | 0.3        |            |            |            |            |     |
| 1/24/2020          | Corresponded with four (4) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.4)                               | 0.4         | Herren, A.  | \$ 121.50          | \$ 48.60       | 0.4        |            |            |            |            |     |
| 1/27/2020          | Research BroadRiver payment details and related documentation. Discuss with Atty Zaro (1.1) Correspondence with MPC and itm/21st on status and transition of responsibilities; follow up with attnys (.6)           | 1.7         | Hebrank, T. | \$ 292.50          | \$ 497.25      |            |            |            | 0.6        |            | 1.1 |
| 1/27/2020          | Corresponded with three (3) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.3)                              | 0.3         | Herren, A.  | \$ 121.50          | \$ 36.45       | 0.3        |            |            |            |            |     |
| 1/28/2020          | Correspondence with attnys and call with Atty Fates (.4) Review and discuss investor letter (.3)  | 0.7         | Hebrank, T. | \$ 292.50          | \$ 204.75      | 0.3        |            |            |            |            | 0.4 |
| 1/28/2020          | Conferred with one (1) and corresponded with one (1) investor(s) re case updates, contact information, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.4)     | 0.4         | Herren, A.  | \$ 121.50          | \$ 48.60       | 0.4        |            |            |            |            |     |
| 1/30/2020          | Call with Atty Zaro, review related documents (.4)  | 0.4         | Hebrank, T. | \$ 292.50          | \$ 117.00      |            |            |            |            |            | 0.4 |
| 1/31/2020          | Make premium wire and check payments; transfer funds (.4) Review draft response to investor, modify and send (.4) Review correspondence and documentation re: class action suit (.4) Review audit confirmation (.2) | 1.4         | Hebrank, T. | \$ 292.50          | \$ 409.50      | 0.6        |            |            | 0.4        |            | 0.4 |
| <b>Grand Total</b> |   | <b>35.5</b> |             | <b>\$ 7,984.80</b> | <b>\$ 15.0</b> | <b>0.0</b> | <b>4.4</b> | <b>4.5</b> | <b>2.4</b> | <b>9.2</b> |     |

|      |                |             |             |             |           |             |             |             |             |
|------|----------------|-------------|-------------|-------------|-----------|-------------|-------------|-------------|-------------|
| 27.3 | Hebrank, T.    | \$ 292.50   | \$ 6,961.50 | \$ 1,462.50 | \$ -      | \$ 789.75   | \$ 1,316.25 | \$ 702.00   | \$ 2,691.00 |
| 0.2  | Rodriguez, G.  | \$ 256.50   | \$ 51.30    | \$ 51.30    | \$ -      | \$ -        | \$ -        | \$ -        | \$ -        |
| 0.0  | Liguzinski, V. | \$ 225.00   | \$ -        | \$ -        | \$ -      | \$ -        | \$ -        | \$ -        | \$ -        |
| 8.0  | Herren, A.     | \$ 121.50   | \$ 972.00   | \$ 765.45   | \$ -      | \$ 206.55   | \$ -        | \$ -        | \$ -        |
| 35.5 |                | \$ 7,984.80 | \$ 2,279.25 | \$ -        | \$ 996.30 | \$ 1,316.25 | \$ 702.00   | \$ 2,691.00 |             |

SEC - PWCG Trust  
February 2020

| Date      | Description of Services   | Hours | Personnel      | Per Hour  | Total Fee | Billing Category Allocation |   |     |     |     |     |
|-----------|---|-------|----------------|-----------|-----------|-----------------------------|---|-----|-----|-----|-----|
|           |   |       |                |           |           | A                           | B | C   | D   | E   | F   |
| 2/13/2019 | Review and analysis of claims detail and order approving distribution.  | 1.8   | Liguzinski, V. | \$ 225.00 | \$ 405.00 |                             |   |     |     | 1.8 |     |
| 2/14/2019 | Confer with L. Lee re claims analysis.  | 0.3   | Liguzinski, V. | \$ 225.00 | \$ 67.50  |                             |   |     |     | 0.3 |     |
| 2/3/2020  | Review filings, post to website (.2) Review and discuss motion re: trustee removal (.4) Pay invoice, operational correspondence (.3)  | 0.9   | Hebrank, T.    | \$ 292.50 | \$ 263.25 | 0.2                         |   |     | 0.3 |     | 0.4 |
| 2/3/2020  | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.8) Corresponded with three (3) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.3) | 1.1   | Herren, A.     | \$ 121.50 | \$ 133.65 | 0.3                         |   |     | 0.8 |     |     |
| 2/4/2020  | Review filings, post to website (.2) Review upcoming trustee transition process (.3) Investor correspondence (.1)   | 0.6   | Hebrank, T.    | \$ 292.50 | \$ 175.50 | 0.3                         |   |     | 0.3 |     |     |
| 2/4/2020  | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)  | 0.1   | Herren, A.     | \$ 121.50 | \$ 12.15  | 0.1                         |   |     |     |     |     |
| 2/5/2020  | Investor communications (.2) Provide info for upcoming Receiver's Report. Review payroll and bank activity (.5) Review filing, post to website (.1)   | 0.8   | Hebrank, T.    | \$ 292.50 | \$ 234.00 | 0.3                         |   | 0.5 |     |     |     |
| 2/5/2020  | Conferred with five (5) and corresponded with three (3) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (1.6)   | 1.6   | Herren, A.     | \$ 121.50 | \$ 194.40 | 1.6                         |   |     |     |     |     |
| 2/6/2020  | Receive and deposit maturity check (.4)   | 0.4   | Hebrank, T.    | \$ 292.50 | \$ 117.00 |                             |   |     | 0.4 |     |     |
| 2/6/2020  | Conferred with one (1) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.4)   | 0.4   | Herren, A.     | \$ 121.50 | \$ 48.60  | 0.4                         |   |     |     |     |     |
| 2/7/2020  | Review, discuss and respond to investor inquiry (.5)  | 0.5   | Hebrank, T.    | \$ 292.50 | \$ 146.25 | 0.5                         |   |     |     |     |     |
| 2/10/2020 | Updates and discussion of MPC trustee role. Review of investor and other correspondence.  | 0.4   | Hebrank, T.    | \$ 292.50 | \$ 117.00 | 0.2                         |   |     | 0.2 |     |     |
| 2/10/2020 | Corresponded with two (2) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.2)  | 0.2   | Herren, A.     | \$ 121.50 | \$ 24.30  | 0.2                         |   |     |     |     |     |
| 2/11/2020 | Follow up on court hearing.   | 0.2   | Hebrank, T.    | \$ 292.50 | \$ 58.50  |                             |   |     |     |     | 0.2 |
| 2/11/2020 | Conferred with two (2) and corresponded with three (3) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (1.1)  | 1.1   | Herren, A.     | \$ 121.50 | \$ 133.65 | 1.1                         |   |     |     |     |     |
| 2/12/2020 | Pay invoices (.2) Review claims motion and post to website. Follow up with itm/21st. Discuss with V Liguzinski and A Herren, set follow up meeting (1.1) Investor correspondence (.1)   | 1.4   | Hebrank, T.    | \$ 292.50 | \$ 409.50 | 0.1                         |   |     | 1.3 |     |     |
| 2/13/2020 | Updates and discussion of claims process (.4) Prepare and have monthly investor case updates distributed (1.4) Investor and misc correspondence (.3)  | 2.1   | Hebrank, T.    | \$ 292.50 | \$ 614.25 | 0.3                         |   | 1.4 |     | 0.4 |     |
| 2/13/2020 | Conferred with three (3) and corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (1.3)  | 1.3   | Herren, A.     | \$ 121.50 | \$ 157.95 | 1.3                         |   |     |     |     |     |
| 2/13/2020 | Sent out monthly case update. (0.1)   | 0.1   | Rodriguez, G.  | \$ 256.50 | \$ 25.65  |                             |   | 0.1 |     |     |     |
| 2/14/2020 | Review and make premium pmts, transfer funds.   | 0.4   | Hebrank, T.    | \$ 292.50 | \$ 117.00 |                             |   |     | 0.4 |     |     |
| 2/14/2020 | Corresponded with two (2) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.2)  | 0.2   | Herren, A.     | \$ 121.50 | \$ 24.30  | 0.2                         |   |     |     |     |     |
| 2/16/2020 | Review correspondence and filings; post to website.   | 0.4   | Hebrank, T.    | \$ 292.50 | \$ 117.00 | 0.4                         |   |     |     |     |     |
| 2/17/2020 | Review quarterly financial activity and prepare SFAR financial data.  | 1.0   | Hebrank, T.    | \$ 292.50 | \$ 292.50 |                             |   | 1.0 |     |     |     |

|                    |   |             |                |           |                    |             |            |            |            |            |            |
|--------------------|---|-------------|----------------|-----------|--------------------|-------------|------------|------------|------------|------------|------------|
| 2/18/2020          | Prepared for and met with A Herren and V Liguzinski re: preparing investor claim letters. Follow up with G Rodriguez (1.6) Complete SFAR (.6)   | 2.2         | Hebrank, T.    | \$ 292.50 | \$ 643.50          |             |            | 0.6        |            | 1.6        |            |
| 2/18/2020          | Conferred with one (1) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.3)   | 0.3         | Herren, A.     | \$ 121.50 | \$ 36.45           | 0.3         |            |            |            |            |            |
| 2/18/2020          | Facilitate development of investor letters.   | 1.9         | Liguzinski, V. | \$ 225.00 | \$ 427.50          |             |            |            |            | 1.9        |            |
| 2/18/2020          | Conferred with T. Hebrank and met with V. Liguzinski re preparation of claims letters. (0.5)  | 0.5         | Rodriguez, G.  | \$ 256.50 | \$ 128.25          |             |            |            |            | 0.5        |            |
| 2/19/2020          | Planning for investor claims database preparation.  | 0.6         | Hebrank, T.    | \$ 292.50 | \$ 175.50          |             |            |            |            | 0.6        |            |
| 2/19/2020          | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.6) Corresponded with sixteen (16) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (1.5) | 2.1         | Herren, A.     | \$ 121.50 | \$ 255.15          | 1.5         |            | 0.6        |            |            |            |
| 2/19/2020          | Discussion with T. Hebrank re set up of database for creating claim letters. (0.1)  | 0.1         | Rodriguez, G.  | \$ 256.50 | \$ 25.65           |             |            |            |            | 0.1        |            |
| 2/20/2020          | Review, update and approve Receiver's Report (.5) Misc operational correspondence (.2)  | 0.7         | Hebrank, T.    | \$ 292.50 | \$ 204.75          | 0.2         |            | 0.5        |            |            |            |
| 2/20/2020          | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)  | 0.1         | Herren, A.     | \$ 121.50 | \$ 12.15           | 0.1         |            |            |            |            |            |
| 2/20/2020          | Continued work on the claims process, including discussion with A. Herren re data and research into same. (0.2)   | 0.2         | Rodriguez, G.  | \$ 256.50 | \$ 51.30           |             |            |            |            | 0.2        |            |
| 2/21/2020          | Review and comment on Trustee transition agreement (.4)   | 0.4         | Hebrank, T.    | \$ 292.50 | \$ 117.00          |             |            |            | 0.4        |            |            |
| 2/21/2020          | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)  | 0.1         | Herren, A.     | \$ 121.50 | \$ 12.15           | 0.1         |            |            |            |            |            |
| 2/24/2020          | Correspondence with MPC and 21st on trustee role transition. Schedule call (.5) Review and execute amendment on trustee substitution (.2)   | 0.7         | Hebrank, T.    | \$ 292.50 | \$ 204.75          |             |            | 0.7        |            |            |            |
| 2/24/2020          | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)  | 0.1         | Herren, A.     | \$ 121.50 | \$ 12.15           | 0.1         |            |            |            |            |            |
| 2/25/2020          | Operational correspondence, correspondence on maturity (.3)   | 0.3         | Hebrank, T.    | \$ 292.50 | \$ 87.75           |             |            | 0.3        |            |            |            |
| 2/25/2020          | Conferred with one (1) and corresponded with twenty-seven (27) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (3.0)  | 3.0         | Herren, A.     | \$ 121.50 | \$ 364.50          | 3.0         |            |            |            |            |            |
| 2/26/2020          | Corresponded with two (2) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.3)  | 0.3         | Herren, A.     | \$ 121.50 | \$ 36.45           | 0.3         |            |            |            |            |            |
| 2/27/2020          | Prepare for and call with MPC and 21st on trustee transition. Follow up correspondence with parties (1.2)   | 1.2         | Hebrank, T.    | \$ 292.50 | \$ 351.00          |             |            | 1.2        |            |            |            |
| 2/27/2020          | Conferred with three (3) and corresponded with forty-two (42) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (4.7)   | 4.7         | Herren, A.     | \$ 121.50 | \$ 571.05          | 4.7         |            |            |            |            |            |
| 2/28/2020          | Corresponded with two (2) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.4)  | 0.4         | Herren, A.     | \$ 121.50 | \$ 48.60           | 0.4         |            |            |            |            |            |
| <b>Grand Total</b> |   | <b>37.2</b> |                |           | <b>\$ 7,654.50</b> | <b>18.2</b> | <b>0.0</b> | <b>4.1</b> | <b>6.9</b> | <b>7.4</b> | <b>0.6</b> |

|      |                |           |             |             |      |             |             |             |           |
|------|----------------|-----------|-------------|-------------|------|-------------|-------------|-------------|-----------|
| 15.2 | Hebrank, T.    | \$ 292.50 | \$ 4,446.00 | \$ 731.25   | \$ - | \$ 1,170.00 | \$ 1,608.75 | \$ 760.50   | \$ 175.50 |
| 0.9  | Rodriguez, G.  | \$ 256.50 | \$ 230.85   | \$ -        | \$ - | \$ 25.65    | \$ -        | \$ 205.20   | \$ -      |
| 4.0  | Liguzinski, V. | \$ 225.00 | \$ 900.00   | \$ -        | \$ - | \$ -        | \$ -        | \$ 900.00   | \$ -      |
| 17.1 | Herren, A.     | \$ 121.50 | \$ 2,077.65 | \$ 1,907.55 | \$ - | \$ -        | \$ 170.10   | \$ -        | \$ -      |
| 37.2 |                |           | \$ 7,654.50 | \$ 2,638.80 | \$ - | \$ 1,195.65 | \$ 1,778.85 | \$ 1,865.70 | \$ 175.50 |

SEC - PWCG Trust  
March 2020

| Date      | Description of Services  | Hours | Personnel      | Per Hour  | Total Fee   | Billing Category Allocation |   |     |     |     |     |
|-----------|--|-------|----------------|-----------|-------------|-----------------------------|---|-----|-----|-----|-----|
|           |  |       |                |           |             | A                           | B | C   | D   | E   | F   |
| 3/2/2020  | Investor calls (.1) Send premium payments and checks, transfer funds (.4)  | 0.5   | Hebrank, T.    | \$ 292.50 | \$ 146.25   | 0.1                         |   |     | 0.4 |     |     |
| 3/2/2020  | Corresponded with ten (10) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (1.1)   | 1.1   | Herren, A.     | \$ 121.50 | \$ 133.65   | 1.1                         |   |     |     |     |     |
| 3/3/2020  | Make addn premium pmts (.2) Updates with attnys (.2)   | 0.4   | Hebrank, T.    | \$ 292.50 | \$ 117.00   |                             |   |     | 0.2 |     | 0.2 |
| 3/3/2020  | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.6)   | 0.6   | Herren, A.     | \$ 121.50 | \$ 72.90    |                             |   |     | 0.6 |     |     |
| 3/4/2020  | Calls with Attnys Zaro and Fates (.5) Review and discussion of MPC trustee transition letter (.4) Follow up on Receiver's Report (.1)  | 1.0   | Hebrank, T.    | \$ 292.50 | \$ 292.50   |                             |   | 0.1 | 0.4 |     | 0.5 |
| 3/4/2020  | Corresponded with nine (9) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.9)  | 0.9   | Herren, A.     | \$ 121.50 | \$ 109.35   | 0.9                         |   |     |     |     |     |
| 3/5/2020  | Operational correspondence (.3) Updates on maturities (.2)   | 0.5   | Hebrank, T.    | \$ 292.50 | \$ 146.25   |                             |   |     | 0.5 |     |     |
| 3/6/2020  | Operational and investor correspondence.   | 0.2   | Hebrank, T.    | \$ 292.50 | \$ 58.50    | 0.1                         |   |     | 0.1 |     |     |
| 3/9/2020  | Operational correspondence.  | 0.2   | Hebrank, T.    | \$ 292.50 | \$ 58.50    |                             |   |     | 0.2 |     |     |
| 3/9/2020  | Facilitate investor letters.   | 0.3   | Liguzinski, V. | \$ 225.00 | \$ 67.50    |                             |   |     |     | 0.3 |     |
| 3/10/2020 | Misc operational correspondence.   | 0.2   | Hebrank, T.    | \$ 292.50 | \$ 58.50    |                             |   |     | 0.2 |     |     |
| 3/11/2020 | Review filing, post to website. Review and pay invoices (.3) Correspondence and review forms re: trustee change forms (.3) Update Interim Receiver's Report (.4) Operational correspondence with itm/21st (.2) Investor correspondence (.1)  | 1.3   | Hebrank, T.    | \$ 292.50 | \$ 380.25   | 0.4                         |   | 0.4 | 0.5 |     |     |
| 3/12/2020 | Make premium wire and check pmts (.4) Call and correspondence with Atty Fates (.3) Operational correspondence (.2) Make arrangements re: trustee change forms (.3)   | 1.2   | Hebrank, T.    | \$ 292.50 | \$ 351.00   |                             |   |     | 0.9 |     | 0.3 |
| 3/12/2020 | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)   | 0.1   | Herren, A.     | \$ 121.50 | \$ 12.15    | 0.1                         |   |     |     |     |     |
| 3/12/2020 | Facilitate investor letters.   | 0.3   | Liguzinski, V. | \$ 225.00 | \$ 67.50    |                             |   |     |     | 0.3 |     |
| 3/13/2020 | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.8)   | 0.8   | Herren, A.     | \$ 121.50 | \$ 97.20    |                             |   |     | 0.8 |     |     |
| 3/16/2020 | Review and execute trustee change forms and submit (1.2) Operational correspondence with itm/21st (.3)   | 1.5   | Hebrank, T.    | \$ 292.50 | \$ 438.75   |                             |   |     | 1.5 |     |     |
| 3/17/2020 | Operational updates re: trustee changes (.4) Review filing and post to website (.1)  | 0.5   | Hebrank, T.    | \$ 292.50 | \$ 146.25   | 0.1                         |   |     | 0.4 |     |     |
| 3/17/2020 | Conferred with one (1) and corresponded with four (4) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.8)   | 0.8   | Herren, A.     | \$ 121.50 | \$ 97.20    | 0.8                         |   |     |     |     |     |
| 3/18/2020 | Execute, organize and send Trustee Change Forms.   | 1.4   | Hebrank, T.    | \$ 292.50 | \$ 409.50   |                             |   |     | 1.4 |     |     |
| 3/19/2020 | Correspondence and make arrangements for Trustee Change Forms (.7) Call with itm/21st on Trustee Change process (.3) Correspondence with attnys (.4) Review and send insurance company change confirmations to itm/21st (.3) Review SEC request for information on Cannon litigation. Search for and summarize investor transactions. Request addn information (1.5) Prepare investor monthly claim update schedule (.5) Correspondence with attnys (.2) | 3.9   | Hebrank, T.    | \$ 292.50 | \$ 1,140.75 |                             |   | 0.5 | 1.7 |     | 1.7 |
| 3/20/2020 | Execute, compile and send trustee Change Form packages (1.6) Correspondence with Atty Fates (.1)   | 1.7   | Hebrank, T.    | \$ 292.50 | \$ 497.25   |                             |   |     | 1.6 |     | 0.1 |
| 3/23/2020 | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)   | 0.1   | Herren, A.     | \$ 121.50 | \$ 12.15    | 0.1                         |   |     |     |     |     |

|                    |  |             |               |           |                    |            |            |            |             |            |            |
|--------------------|--|-------------|---------------|-----------|--------------------|------------|------------|------------|-------------|------------|------------|
| 3/24/2020          | Finalize and submit investor monthly case update report (.8) Investor and operational correspondence (.3) Review mail, provide Trustee Change Forms to itm/21st (.4)   | 1.5         | Hebrank, T.   | \$ 292.50 | \$ 438.75          |            |            | 0.8        | 0.7         |            |            |
| 3/24/2020          | Conferred with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.3)  | 0.3         | Herren, A.    | \$ 121.50 | \$ 36.45           | 0.3        |            |            |             |            |            |
| 3/25/2020          | Coordinated monthly case update. (.02)   | 0.2         | Rodriguez, G. | \$ 256.50 | \$ 51.30           |            |            | 0.2        |             |            |            |
| 3/26/2020          | Review, complete and send Trustee Change Forms (1.4) Research premium payment and correspond with itm/21st (.2)  | 1.6         | Hebrank, T.   | \$ 292.50 | \$ 468.00          |            |            |            | 1.6         |            |            |
| 3/26/2020          | Conferred with two (2) and corresponded with thirty-three (33) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (4.2)   | 4.2         | Herren, A.    | \$ 121.50 | \$ 510.30          | 4.2        |            |            |             |            |            |
| 3/27/2020          | Review mail, operational correspondence.   | 0.4         | Hebrank, T.   | \$ 292.50 | \$ 117.00          |            |            |            | 0.4         |            |            |
| 3/27/2020          | Conferred with one (1) and corresponded with four (4) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.7)   | 0.7         | Herren, A.    | \$ 121.50 | \$ 85.05           | 0.7        |            |            |             |            |            |
| 3/30/2020          | Review mail, disseminate (.4) Provide and follow up on billing invoices (.3) Provide Trustee Change Forms (.3) Review and make premium payments, transfer funds (.5)   | 1.5         | Hebrank, T.   | \$ 292.50 | \$ 438.75          |            |            |            | 1.5         |            |            |
| 3/30/2020          | Corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.1)   | 0.1         | Herren, A.    | \$ 121.50 | \$ 12.15           | 0.1        |            |            |             |            |            |
| 3/31/2020          | Review, process, complete and send Trustee Change Forms (1.4) Review Cannon policy purchase details; locate and request addn details. Prepare schedule (1.0)   | 2.4         | Hebrank, T.   | \$ 292.50 | \$ 702.00          |            |            |            | 1.4         |            | 1.0        |
| 3/31/2020          | Prepared and distributed FedEx and transmittal for policy premium payments; scanned and archived same; corresponded with N. Song and T. Hebrank re tracking information and confirmation of same. (.8) Conferred with two (2) and corresponded with one (1) investor(s) re case updates, updating contact information, claim letters, policy maturities, policy status, policy payments, IRA accounts, claims and status of receivership. (.9) | 1.7         | Herren, A.    | \$ 121.50 | \$ 206.55          | 0.9        |            |            | 0.8         |            |            |
| <b>Grand Total</b> |  | <b>34.1</b> |               |           | <b>\$ 7,977.15</b> | <b>9.9</b> | <b>0.0</b> | <b>2.0</b> | <b>17.8</b> | <b>0.6</b> | <b>3.8</b> |

|             |                |           |                    |                    |             |                  |                    |                  |                    |
|-------------|----------------|-----------|--------------------|--------------------|-------------|------------------|--------------------|------------------|--------------------|
| 21.9        | Hebrank, T.    | \$ 292.50 | \$ 6,405.75        | \$ 204.75          | \$ -        | \$ 526.50        | \$ 4,563.00        | \$ -             | \$ 1,111.50        |
| 0.2         | Rodriguez, G.  | \$ 256.50 | \$ 51.30           | \$ -               | \$ -        | \$ 51.30         | \$ -               | \$ -             | \$ -               |
| 0.6         | Liguzinski, V. | \$ 225.00 | \$ 135.00          | \$ -               | \$ -        | \$ -             | \$ -               | \$ 135.00        | \$ -               |
| 11.4        | Herren, A.     | \$ 121.50 | \$ 1,385.10        | \$ 1,117.80        | \$ -        | \$ -             | \$ 267.30          | \$ -             | \$ -               |
| <b>34.1</b> |                |           | <b>\$ 7,977.15</b> | <b>\$ 1,322.55</b> | <b>\$ -</b> | <b>\$ 577.80</b> | <b>\$ 4,830.30</b> | <b>\$ 135.00</b> | <b>\$ 1,111.50</b> |

# EXHIBIT “B”

**SEC - PWCG Trust**  
**Fee Application #9 Summary - Fees**

| Date        |       | Hours          | Personnel | Per Hour     | Total Fee   | Billing Category Allocation |             |             |             |             |   |
|-------------|-------|----------------|-----------|--------------|-------------|-----------------------------|-------------|-------------|-------------|-------------|---|
|             |       |                |           |              |             | A                           | B           | C           | D           | E           | F |
| Jan 20 Fees | 27.3  | Hebrank, T.    | \$ 292.50 | \$ 6,961.50  | \$ 1,462.50 | \$ -                        | \$ 789.75   | \$ 1,316.25 | \$ 702.00   | \$ 2,691.00 |   |
|             | 0.2   | Rodriguez, G.  | \$ 256.50 | \$ 51.30     | \$ 51.30    | \$ -                        | \$ -        | \$ -        | \$ -        | \$ -        |   |
|             | 0.0   | Liguzinski, V. | \$ 225.00 | \$ -         | \$ -        | \$ -                        | \$ -        | \$ -        | \$ -        | \$ -        |   |
|             | 8.0   | Herren, A.     | \$ 121.50 | \$ 972.00    | \$ 765.45   | \$ -                        | \$ 206.55   | \$ -        | \$ -        | \$ -        |   |
|             | 35.5  |                |           | \$ 7,984.80  | \$ 2,279.25 | \$ -                        | \$ 996.30   | \$ 1,316.25 | \$ 702.00   | \$ 2,691.00 |   |
| Feb 20 Fees | 15.2  | Hebrank, T.    | \$ 292.50 | \$ 4,446.00  | \$ 731.25   | \$ -                        | \$ 1,170.00 | \$ 1,608.75 | \$ 760.50   | \$ 175.50   |   |
|             | 0.9   | Rodriguez, G.  | \$ 256.50 | \$ 230.85    | \$ -        | \$ -                        | \$ 25.65    | \$ -        | \$ 205.20   | \$ -        |   |
|             | 4.0   | Liguzinski, V. | \$ 225.00 | \$ 900.00    | \$ -        | \$ -                        | \$ -        | \$ -        | \$ 900.00   | \$ -        |   |
|             | 17.1  | Herren, A.     | \$ 121.50 | \$ 2,077.65  | \$ 1,907.55 | \$ -                        | \$ -        | \$ 170.10   | \$ -        | \$ -        |   |
|             | 37.2  |                |           | \$ 7,654.50  | \$ 2,638.80 | \$ -                        | \$ 1,195.65 | \$ 1,778.85 | \$ 1,865.70 | \$ 175.50   |   |
| Mar 20 Fees | 21.9  | Hebrank, T.    | \$ 292.50 | \$ 6,405.75  | \$ 204.75   | \$ -                        | \$ 526.50   | \$ 4,563.00 | \$ -        | \$ 1,111.50 |   |
|             | 0.2   | Rodriguez, G.  | \$ 256.50 | \$ 51.30     | \$ -        | \$ -                        | \$ 51.30    | \$ -        | \$ -        | \$ -        |   |
|             | 0.6   | Liguzinski, V. | \$ 225.00 | \$ 135.00    | \$ -        | \$ -                        | \$ -        | \$ -        | \$ 135.00   | \$ -        |   |
|             | 11.4  | Herren, A.     | \$ 121.50 | \$ 1,385.10  | \$ 1,117.80 | \$ -                        | \$ -        | \$ 267.30   | \$ -        | \$ -        |   |
|             | 34.1  |                |           | \$ 7,977.15  | \$ 1,322.55 | \$ -                        | \$ 577.80   | \$ 4,830.30 | \$ 135.00   | \$ 1,111.50 |   |
| Grand Total | 64.4  | Hebrank, T.    | \$ 292.50 | \$ 17,813.25 | \$ 2,398.50 | \$ -                        | \$ 2,486.25 | \$ 7,488.00 | \$ 1,462.50 | \$ 3,978.00 |   |
|             | 1.3   | Rodriguez, G.  | \$ 256.50 | \$ 333.45    | \$ 51.30    | \$ -                        | \$ 76.95    | \$ -        | \$ 205.20   | \$ -        |   |
|             | 4.6   | Liguzinski, V. | \$ 225.00 | \$ 1,035.00  | \$ -        | \$ -                        | \$ -        | \$ -        | \$ 1,035.00 | \$ -        |   |
|             | 36.5  | Herren, A.     | \$ 121.50 | \$ 4,434.75  | \$ 3,790.80 | \$ -                        | \$ 206.55   | \$ 437.40   | \$ -        | \$ -        |   |
|             | 106.8 | Total          |           | \$ 23,616.45 | \$ 6,240.60 | \$ -                        | \$ 2,769.75 | \$ 7,925.40 | \$ 2,702.70 | \$ 3,978.00 |   |

**SEC - PWCG Trust  
Fee Application #9 Summary - Hours**

| Date         | Description of Services | Hours          | Personnel | Per Hour | Total Fee | Billing Category Allocation |     |      |      |      |      |
|--------------|-------------------------|----------------|-----------|----------|-----------|-----------------------------|-----|------|------|------|------|
|              |                         |                |           |          |           | A                           | B   | C    | D    | E    | F    |
| Jan 20 Hours | 27.3                    | Hebrank, T.    |           |          |           | 8.5                         | 0.0 | 2.7  | 4.5  | 2.4  | 9.2  |
|              | 0.2                     | Rodriguez, G.  |           |          |           | 0.2                         | 0.0 | 0.0  | 0.0  | 0.0  | 0.0  |
|              | 0.0                     | Liguzinski, V. |           |          |           | 0.0                         | 0.0 | 0.0  | 0.0  | 0.0  | 0.0  |
|              | 8.0                     | Herren, A.     |           |          |           | 6.3                         | 0.0 | 1.7  | 0.0  | 0.0  | 0.0  |
|              | 35.5                    |                |           |          |           | 15.0                        | 0.0 | 4.4  | 4.5  | 2.4  | 9.2  |
| Feb 20 Hours | 15.2                    | Hebrank, T.    |           |          |           | 2.5                         | 0.0 | 4.0  | 5.5  | 2.6  | 0.6  |
|              | 0.9                     | Rodriguez, G.  |           |          |           | 0.0                         | 0.0 | 0.1  | 0.0  | 0.8  | 0.0  |
|              | 4.0                     | Liguzinski, V. |           |          |           | 0.0                         | 0.0 | 0.0  | 0.0  | 4.0  | 0.0  |
|              | 17.1                    | Herren, A.     |           |          |           | 15.7                        | 0.0 | 0.0  | 1.4  | 0.0  | 0.0  |
|              | 37.2                    |                |           |          |           | 18.2                        | 0.0 | 4.1  | 6.9  | 7.4  | 0.6  |
| Mar 20 Hours | 21.9                    | Hebrank, T.    |           |          |           | 0.7                         | 0.0 | 1.8  | 15.6 | 0.0  | 3.8  |
|              | 0.2                     | Rodriguez, G.  |           |          |           | 0.0                         | 0.0 | 0.2  | 0.0  | 0.0  | 0.0  |
|              | 0.6                     | Liguzinski, V. |           |          |           | 0.0                         | 0.0 | 0.0  | 0.0  | 0.6  | 0.0  |
|              | 11.4                    | Herren, A.     |           |          |           | 9.2                         | 0.0 | 0.0  | 2.2  | 0.0  | 0.0  |
|              | 34.1                    |                |           |          |           | 9.9                         | 0.0 | 2.0  | 17.8 | 0.6  | 3.8  |
| Grand Total  | 64.4                    | Hebrank, T.    |           |          |           | 11.7                        | 0.0 | 8.5  | 25.6 | 5.0  | 13.6 |
|              | 1.3                     | Rodriguez, G.  |           |          |           | 0.2                         | 0.0 | 0.3  | 0.0  | 0.8  | 0.0  |
|              | 4.6                     | Liguzinski, V. |           |          |           | 0.0                         | 0.0 | 0.0  | 0.0  | 4.6  | 0.0  |
|              | 36.5                    | Herren, A.     |           |          |           | 31.2                        | 0.0 | 1.7  | 3.6  | 0.0  | 0.0  |
|              | 106.8                   |                |           |          |           | 43.1                        | 0.0 | 10.5 | 29.2 | 10.4 | 13.6 |

\$ 144.79 #DIV/0! \$ 263.79 \$ 271.42 \$ 259.88 \$ 292.50

# EXHIBIT "C"

## SEC - PWCG Trust

### Fee Application #9 - Costs

| Date      | Description                 | Expense            | Personnel |
|-----------|-----------------------------|--------------------|-----------|
| 1/13/2020 | Travel Costs- Court Hearing | \$ 122.97          | Hebrank   |
| 1/31/2020 | Website                     | \$ 565.00          | E3        |
| 1/31/2020 | FedEx                       | \$ 143.60          | E3        |
| 1/31/2020 | Postage                     | \$ 3.30            | E3        |
| 1/31/2020 | Copies 289 @ .15            | \$ 43.35           | E3        |
|           | <b>Total</b>                | <b>\$ 755.25</b>   |           |
|           |                             |                    |           |
| 2/29/2020 | Website                     | \$ 480.00          | E3        |
| 2/29/2020 | FedEx                       | \$ 141.44          | E3        |
| 2/29/2020 | Postage                     | \$ 2.75            | E3        |
| 2/29/2020 | Copies 216 @ .15            | \$ 32.40           | E3        |
|           | <b>Total</b>                | <b>\$ 656.59</b>   |           |
|           |                             |                    |           |
| 3/31/2020 | Website                     | \$ 437.50          | E3        |
| 3/31/2020 | FedEx                       | \$ 141.60          | E3        |
| 3/31/2020 | Postage                     | \$ 2.75            | E3        |
| 3/31/2020 | Copies 748 @ .15            | \$ 112.20          | E3        |
|           | <b>Total</b>                | <b>\$ 694.05</b>   |           |
|           |                             |                    |           |
|           | <b>Grand Total</b>          | <b>\$ 2,105.89</b> |           |

# EXHIBIT “D”

Thomas C. Hebrank, Receiver  
E3 Advisors  
501 West Broadway, Suite 290  
San Diego, CA 92101  
(619) 567-7223

## **STANDARDIZED FUND ACCOUNTING REPORT**

**CIVIL - RECEIVERSHIP FUND**

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SECURITIES AND EXCHANGE COMMISSION,  
Plaintiff,

v.

PACIFIC WEST CAPITAL GROUP, INC.; ANDREW B CALHOUN IV; PWCG TRUST; et  
al, Defendants

Case No. 2:15-cv-02563 FMO (FFMx)

REPORTING PERIOD 01/01/20 TO 03/31/20

| FUND ACCOUNTING (See instructions):                                       |             |          |             |
|---|-------------|----------|-------------|
|   | Detail      | Subtotal | Grand Total |
| Line 1 Beginning Balance (As of 01/01/20):                                | 13,599,540  |          | 13,599,540  |
| <i>Increases in Fund Balance:</i>   |             |          |             |
| Line 2 Business Income  |             |          | -           |
| Line 3 Policy Maturities  | 1,000,000   |          | 1,000,000   |
| Line 4 Interest/Dividend Income   | 17,284      |          | 17,284      |
| Line 5 Business Asset Liquidation   | -           |          | -           |
| Line 6 Personal Asset Liquidation   | -           |          | -           |
| Line 7 Third-Party Litigation Income                                      | -           |          | -           |
| Line 8 Misc - Insurance & Prop Tax Refunds                                | -           |          | -           |
| Total Funds Available (Lines 1 - 8):                                      | 14,616,824  |          | 14,616,824  |
| <i>Decreases in Fund Balance:</i>   |             |          |             |
| Line 9 Disbursements to Investors   | -           |          | -           |
| Line 10 Disbursements to Receivership Operations                          |             |          |             |
| Line 10a Disbursement to Receiver or Other Professionals                  | (177,029)   |          | (177,029)   |
| Line 10b Business Asset Expenses  | (2,117,750) |          | (2,117,750) |
| Line 10c Personal Asset Expenses  | -           |          | -           |
| Line 10d Investment Expenses  | -           |          | -           |
| Line 10e Third-Party Litigation Expenses                                  | -           |          | -           |
| 1. Attorney Fees  | -           |          | -           |
| 2. Litigation Expenses  | -           |          | -           |
| Total Third-Party Litigation Expenses                                     | -           |          | -           |
| Line 10f Tax Administrator Fees and Bonds                                 | -           |          | -           |
| Line 10g Federal and State Tax Payments                                   | -           |          | -           |
| Total Disbursements for Receivership Operations                           | -           |          | (2,294,779) |
| Line 11 Disbursements for Distribution Expenses Paid by the Fund:         |             |          |             |
| Line 11a Distribution Plan Development Expenses:                          |             |          |             |
| 1. Fees:  |             |          |             |
| Fund Administrator.....   | -           |          | -           |
| Independent Distribution Consultant (IDC).....                            | -           |          | -           |
| Distribution Agent.....   | -           |          | -           |
| Consultants.....  | -           |          | -           |
| Legal Advisors.....   | -           |          | -           |
| Tax Advisors.....   | -           |          | -           |
| 2. Administrative Expenses  | -           |          | -           |
| 3. Miscellaneous  | -           |          | -           |
| Total Plan Developmental Expenses   |             |          | -           |
| Line 11b Distribution Plan Implementation Expenses:                       |             |          |             |
| 1. Fees:  |             |          |             |
| Fund Administrator.....   | -           |          | -           |
| IDC.....  | -           |          | -           |
| Distribution Agent.....   | -           |          | -           |
| Consultants.....  | -           |          | -           |
| Legal Advisors.....   | -           |          | -           |
| Tax Advisors.....   | -           |          | -           |
| 2. Administrative Expenses  | -           |          | -           |
| 3. Investor Identification:   |             |          |             |
| Notice/Publishing Approved Plan.....                                      | -           |          | -           |
| Claimant Identification.....  | -           |          | -           |
| Claims Processing.....  | -           |          | -           |
| Web Site Maintenance/Call Center.....                                     | -           |          | -           |
| 4. Fund Administrator Bond  | -           |          | -           |
| 5. Miscellaneous  | -           |          | -           |
| 6. Federal Account for Investor Restitution (FAIR) Reports Expenses       | -           |          | -           |
| Total Plan Implementation Expenses  |             |          | -           |
| Total Disbursements for Distribution Expenses Paid by the Fund            |             |          | -           |
| Line 12 Disbursements to Court/Other:                                     |             |          |             |
| Line 12a Investment Expenses/Court Registry Investment System (CRIS) Fees | -           |          | -           |
| Line 12b Federal Tax Payments   | -           |          | -           |
| Total Disbursement to Court/Other:  |             |          | -           |
| Total Funds Disbursed (Lines 9 - 11):                                     |             |          | (2,294,779) |
| Line 13 Ending Balance (As of 03/31/20):                                  |             |          | 12,322,045  |

|                |   |  |  |            |
|----------------|---|--|--|------------|
| <b>Line 14</b> | <b>Ending Balance of Fund - Net Assets:</b> |  |  |            |
| Line 14a       | Cash & Cash Equivalents                     |  |  | 12,322,045 |
| Line 14b       | Investments                                 |  |  | -          |
| Line 14c       | Other Assets or Uncleared Funds             |  |  | -          |
|                | Total Ending Balance of Fund - Net Assets   |  |  | 12,322,045 |

| OTHER SUPPLEMENTAL INFORMATION:                    |  |               |                 |                    |
|--|--|---------------|-----------------|--------------------|
|  |  | <u>Detail</u> | <u>Subtotal</u> | <u>Grand Total</u> |
| <b>Report of Items NOT to be Paid by the Fund:</b> |  |               |                 |                    |
| <b>Line 15</b>                                     | <b>Disbursement for Plan Administration Expenses Not Paid by the Fund:</b>       |               |                 |                    |
| Line 15a   | Plan Development Expenses Not Paid by the Fund:                                  |               |                 |                    |
|  | 1. Fees:   |               |                 |                    |
|  | Fund Administrator.....  | -             |                 | -                  |
|  | IDC.....   | -             |                 | -                  |
|  | Distribution Agent.....  | -             |                 | -                  |
|  | Consultants.....   | -             |                 | -                  |
|  | Legal Advisors.....  | -             |                 | -                  |
|  | Tax Advisors.....  | -             |                 | -                  |
|  | 2. Administrative Expenses   | -             |                 | -                  |
|  | 3. Miscellaneous   | -             |                 | -                  |
|  | <b>Total Plan Developmental Expenses Not Paid by the Fund</b>                    |               |                 | -                  |
| Line 15b   | Plan Implementation Expenses Not Paid by the Fund                                |               |                 |                    |
|  | 1. Fees:   |               |                 |                    |
|  | Fund Administrator.....  | -             |                 | -                  |
|  | IDC.....   | -             |                 | -                  |
|  | Distribution Agent.....  | -             |                 | -                  |
|  | Consultants.....   | -             |                 | -                  |
|  | Legal Advisors.....  | -             |                 | -                  |
|  | Tax Advisors.....  | -             |                 | -                  |
|  | 2. Administrative Expenses   | -             |                 | -                  |
|  | 3. Investor Identification   |               |                 |                    |
|  | Notice/Publishing Approved Plan.....   | -             |                 | -                  |
|  | Claimant Identification.....   | -             |                 | -                  |
|  | Claims Processing.....   | -             |                 | -                  |
|  | Web Site Maintenance/Call Center.....  | -             |                 | -                  |
|  | 4. Fund Administrator Bond   | -             |                 | -                  |
|  | 5. Miscellaneous   | -             |                 | -                  |
|  | 6. FAIR Reporting Expenses   | -             |                 | -                  |
|  | <b>Total Plan Implementation Expenses Not Paid by the Fund</b>                   |               |                 | -                  |
| Line 15c   | Tax Administrator Fees & Bonds Not Paid by the Fund                              |               |                 | -                  |
|  | <b>Total Disbursements for Plan Administration Expenses Not Paid by the Fund</b> |               |                 | -                  |
| <b>Line 16</b>                                     | <b>Disbursements to Court/Other Not Paid by the Fund:</b>                        |               |                 |                    |
| Line 16a   | Investment Expenses/CRIS Fees  | -             |                 | -                  |
| Line 16b   | Federal Tax Payments   | -             |                 | -                  |
|  | <b>Total Disbursement to Court/Other Not Paid by the Fund:</b>                   |               |                 | -                  |
| <b>Line 17</b>                                     | <b>DC &amp; State Tax Payments</b>   | -             |                 | -                  |
| <b>Line 18</b>                                     | <b>No. of Claims:</b>  |               |                 |                    |
| Line 18a   | # of Claims Received This Reporting Period.....                                  |               |                 | 0                  |
| Line 18b   | # of Claims Received Since Inception of Fund.....                                |               |                 | 0                  |
| <b>Line 19</b>                                     | <b>No. of Claimants/Investors:</b>   |               |                 |                    |
| Line 19a   | # of Claimants/Investors Paid this Reporting Period.....                         |               |                 | 0                  |
| Line 19b   | # of Claimants/Investors Paid Since Inception of Fund.....                       |               |                 | 0                  |

Receiver: Thomas C Hebrank  
By: Thomas C. Hebrank  
Thomas C. Hebrank  
Court-Appointed Receiver

Date: 5/1/20

**PWCG Trust**

**Quarterly Operating Report - Financial Summaries**

|   | RR#1      | RR#2        | RR#3        | RR#4        | RR#5        | RR#6        | RR#7        | RR#8        | RR#9        |
|---|-----------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Beginning Cash                          | 8,760,000 | 7,980,330   | 11,045,530  | 8,362,202   | 5,457,403   | 5,751,008   | 9,729,685   | 14,384,676  | 13,599,540  |
| <u>Receipts</u>                         |           |             |             |             |             |             |             |             |             |
| Policy Maturities                       | -         | 5,073,731   | -           | -           | 1,332,296   | 5,508,404   | 6,260,814   | 904,808     | 1,000,000   |
| Interest Income                         | 204       | 625         | 735         | 550         | 370         | 6,438       | 25,207      | 20,908      | 17,284      |
| Miscellaneous - Other                   |           |             |             |             | 129         |             |             |             |             |
| Policy Sales                            | -         | -           | -           | -           | 850,000     | 258,408     | 11,408      | -           | -           |
| Total Receipts                          | 204       | 5,074,356   | 735         | 550         | 2,182,795   | 5,773,249   | 6,297,429   | 925,717     | 1,017,284   |
| <u>Disbursements</u>                    |           |             |             |             |             |             |             |             |             |
| Disbursements to Receiver/Professionals | -         | -           | (126,945)   | (129,623)   | (80,615)    | (55,623)    | (115,473)   | -           | (177,029)   |
| Business Asset Expenses                 | (779,874) | (2,009,156) | (2,557,118) | (2,775,727) | (1,808,575) | (1,679,249) | (1,526,965) | (1,709,724) | (2,117,750) |
| Litigation Expenses                     |           |             |             |             |             |             |             | (450)       | -           |
| Net Business Asset Expenses             | (779,874) | (2,009,156) | (2,684,062) | (2,905,350) | (1,889,190) | (1,734,873) | (1,642,438) | (1,710,174) | (2,294,779) |
| Federal and State Tax Payments          | -         | -           | -           | -           | -           | (59,700)    |             | (679)       | -           |
| Total Disbursements                     | (779,874) | (2,009,156) | (2,684,062) | (2,905,350) | (1,889,190) | (1,794,573) | (1,642,438) | (1,710,853) | (2,294,779) |
| Ending Cash                             | 7,980,330 | 11,045,530  | 8,362,202   | 5,457,403   | 5,751,008   | 9,729,685   | 14,384,676  | 13,599,540  | 12,322,045  |
| <u>Bank Statements</u>                  |           |             |             |             |             |             |             |             |             |
| Checking                                |           | 160,970     | 191,907     | 91,557      | 52,497      | 128,712     | 47,681      | 96,829      | 117,050     |
| PWCG Trust #1                           |           | 6,868,818   | 2,966,029   | 2,599,589   | 2,466,436   | 2,036,614   | 1,536,979   | 1,181,919   | 556,980     |
| PWCG Trust #2                           |           | 4,015,743   | 5,204,266   | 2,766,256   | 3,232,076   | 2,049,881   | 1,931,300   | 1,431,411   | 741,488     |
| CD                                      |           |             |             |             |             |             | 5,329,347   | 5,329,347   | 5,329,347   |
| CBB                                     |           |             |             |             |             | 5,514,478   | 5,539,369   | 5,560,034   | 5,577,181   |
|   | -         | 11,045,530  | 8,362,202   | 5,457,403   | 5,751,008   | 9,729,685   | 14,384,676  | 13,599,540  | 12,322,045  |