

1 THOMAS C. HEBRANK
Receiver
2 501 West Broadway, Suite 290
San Diego, California 92101
3 Phone: (619) 567-7223
Fax: (619) 567-7191
4 E-Mail: thebrank@ethreadvisors.com
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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-DDP (ASx)

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

Date: February 27, 2023
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 nineteenth interim application for approval and payment
 3 of fees and reimbursement of expenses ("Application"). This Application covers the
 4 period from July 1, 2022 through September 30, 2022 ("Application Period"), and
 5 seeks interim approval of \$9,796.50 in fees and \$1,361.07 in expenses, and an order
 6 authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred
 7 (\$7,837.20) 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 34.5 hours at an overall blended billing rate of \$283.96
 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 Nineteenth Interim Report filed on
 16 November 10, 2022.

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

26 A. General Receivership

27 This category includes time spent by the Receiver on (a) communications with
 28 numerous parties, including Plaintiff, Defendant, and itm/21st; (b) review of filings,

follow up, and posting to the receivership website; (c) various investor communications including case updates, tax treatment of items, questions on their individual investments, changes in contact information, etc.; and (d) other administrative items.

Name	Title	Rate	Hours	Fees
T. Hebrank	Receiver	\$360.00	1.4	\$504.00
G. Rodriguez	Mng. Director	\$315.00	2.2	\$693.00
A. Herren	Investor Rel.	\$157.50	7.9	\$1,244.25
TOTAL			11.5	\$2,441.25
Avg. Hourly Rate		\$212.28		

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.

Name	Title	Rate	Hours	Fees
T. Hebrank	Receiver	\$360.00	5.7	\$2,052.00
G. Rodriguez	Mng. Director	\$315.00	0.0	\$0.00
TOTAL			5.7	\$2,052.00
Avg. Hourly Rate		\$360.00		

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/21st; (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; (e) preparation of tax schedules and analysis and projections on various tax reporting scenarios; and (f) preparation and analysis of an updated portfolio valuation.

Name	Title	Rate	Hours	Fees
T. Hebrank	Receiver	\$360.00	10.3	\$3,708.00
G. Rodriguez	Mng. Director	\$315.00	0.0	\$0.00
A. Herren	Investor Rel.	\$157.50	2.1	\$330.75
TOTAL			12.4	\$4,038.75
Avg. Hourly Rate		\$325.71		

E. Claims & Distributions

This category includes time spent by the Receiver working on the investor claims and distributions. The investor distributions generated a high volume of investor calls, including many concerning the handling of their IRA retirement investments and corresponding tax treatments.

Name	Title	Rate	Hours	Fees
T. Hebrank	Receiver	\$360.00	0.6	\$216.00
G. Rodriguez	Mng. Director	\$315.00	0.3	\$94.50
A. Herren	Investor Rel.	\$157.50	2.4	\$378.00
TOTAL			3.3	\$688.50
Avg. Hourly Rate		\$208.64		

F. Legal Matters & Pending Litigation

This category includes time spent by the Receiver on legal matters and pending litigation. Much of the time in this Application Period related to document production and the Mills Potoczak & Company litigation and mediation.

Name	Title	Rate	Hours	Fees
T. Hebrank	Receiver	\$360.00	1.6	\$576.00
TOTAL			1.6	\$576.00
Avg. Hourly Rate		\$360.00		

G. Costs

The Receiver requests the Court approve \$1,361.07 in costs. A detailed listing of each expense is summarized in Exhibit C. The Application Period included the document shipping charges, as well as monthly costs for the receivership website and investor mailings.

II. FEES AND COSTS INCURRED AND PAID TO DATE

From inception of the receivership through September 30, 2022, the Receiver incurred fees and costs of \$555,939.14, of which amount \$104,170.41 is subject to holdback pending approval of the Receiver's final fee application at the conclusion of the receivership, \$11,157.57 is awaiting the Court's review and approval, and \$442,570.46 has been approved by the Court and paid to date. During the same time period, Allen Matkins has incurred fees and costs of \$1,570,799.20, of which amount \$307,117.44 is subject to holdback pending approval of Allen Matkins' final fee application at the conclusion of the receivership, \$74,041.99 is awaiting the Court's review and approval, and \$1,203,918.09 has been approved by the Court and paid to date.

III. STANDARDIZED FUND ACCOUNTING REPORT

Attached hereto as Exhibit D is a Standardized Fund Accounting Report covering the time period from June 1, 2022 through September 30, 2022 to coincide 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

1 dispatch with which the work is conducted and the result obtained." *United States v.*
2 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
3 omitted). In practical terms, receiver and professional compensation thus ultimately
4 rests upon the result of an equitable, multi-factor balancing test involving the
5 "economy of administration, the burden that the estate may be able to bear, the
6 amount of time required, although not necessarily expended, and the overall value of
7 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
8 1970). Regardless of how this balancing test is formulated, no single factor is
9 determinative and "a reasonable fee is based [upon] all circumstances surrounding
10 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*,
11 374 F. Supp. 465, 480 (S.D. Tex. 1974).

12 As a preliminary matter, the Judgment appointing the Receiver confers on the
13 Receiver substantial duties and powers, including to conduct such investigation and
14 discovery as is necessary to locate and account for all receivership assets, take such
15 action as is necessary and appropriate to assume control over and preserve
16 receivership assets, and employ attorneys and others to investigate and, where
17 appropriate, institute, pursue, and prosecute all claims and causes of action of
18 whatever kind and nature. *See* Dkt. 145, Section III.

19 The Receiver believes this fee request is fair and reasonable and the fees and
20 costs incurred were necessary to the administration of the receivership estate. The
21 Receiver has submitted a detailed fee application which describes the nature of the
22 services rendered, and the identity and billing rate of each individual performing
23 each task. *See* Exhibit A. The Receiver's request for compensation is based on his
24 customary billing rates charged in similar matters, discounted by 10 percent. The
25 blended hourly rate for all services provided during the Application Period is
26 \$281.54. The Receiver's billing rates are comparable or less than those charged in
27 the community on similarly complex matters.

28

V. CONCLUSION

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

WHEREFORE, the Receiver requests an order:

1. Approving \$9,796.50 in fees and \$1,361.07 in costs incurred by the Receiver during the Application Period and authorizing payment on an interim basis of \$7,837.20 in fees and \$1,361.07 in costs from available receivership estate cash; and
2. Granting such other and further relief as is appropriate.

Dated: January 19, 2023


By: 
THOMAS C. HEBRANK,
Permanent Receiver

EXHIBIT "A"

SEC - PWCG Trust
July 2022

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	Billing Category Allocation					
						A	B	C	D	E	F
7/1/2022	Corresponded with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
7/11/2022	Conferred with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.3) Corresponded with G. Rodriguez re investor claims. (.2)	0.5	Herren, A.	\$ 157.50	\$ 78.75	0.5					
7/11/2022	General: discussion with Atty Fates re details of the total claimants and provided additional context. (0.3)	0.3	Rodriguez, G.	\$ 315.00	\$ 94.50					0.3	
7/12/2022	Conferred with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
7/15/2022	Investor correspondence.	0.1	Hebrank, T.	\$ 360.00	\$ 36.00	0.1					
7/15/2022	Conferred with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
7/18/2022	Conferred with two (2) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
7/19/2022	Attorney correspondence. Review and process mail. Complete and send claims documents.	1.3	Hebrank, T.	\$ 360.00	\$ 468.00				0.5	0.6	0.2
7/19/2022	Corresponded with three (3) investor(s) re case updates and claim matters. (.3) Reissued investor distribution; corresponded re same. (.3)	0.6	Herren, A.	\$ 157.50	\$ 94.50	0.3				0.3	
7/20/2022	Make premium payments and wires. Deliver FedEx.	0.8	Hebrank, T.	\$ 360.00	\$ 288.00				0.8		
7/20/2022	Prepared FedEx labels and transmittals for policy premium payments; corresponded with T. Hebrank re same. (.2) Downloaded and recorded investor reissued distribution mailing confirmation. (.2) Corresponded with T. Hebrank re investor claims; researched and reviewed same. (.3)	0.7	Herren, A.	\$ 157.50	\$ 110.25				0.2	0.5	
7/25/2022	Conferred with two (2) and corresponded with two (2) investor(s) re case updates and claim matters. (.6)	0.6	Herren, A.	\$ 157.50	\$ 94.50	0.6					
7/27/2022	Sign and send check. Review and approve premium stream payments.	0.4	Hebrank, T.	\$ 360.00	\$ 144.00				0.4		
7/28/2022	Receive and report on maturity check. Review and process weekly mail.	0.5	Hebrank, T.	\$ 360.00	\$ 180.00				0.5		
7/28/2022	Conferred with one (1) investor(s) re case updates and claim matters. (.1) Entered positive pay for reissued investor distribution. Corresponded with investor re receipt of distribution check. (.2)	0.3	Herren, A.	\$ 157.50	\$ 47.25	0.1				0.2	
7/29/2022	Make premium payments and wires. Deliver FedEx.	0.9	Hebrank, T.	\$ 360.00	\$ 324.00				0.9		
7/29/2022	Prepared FedEx labels and transmittals for policy premium payments; corresponded with T. Hebrank re same. (.4)	0.4	Herren, A.	\$ 157.50	\$ 63.00				0.4		
Grand Total		7.9			\$ 2,101.50	2.1	0.0	0.0	3.7	1.9	0.2

4.0	Hebrank, T.	\$ 360.00	\$ 1,440.00	\$ 36.00	\$ -	\$ -	\$ 1,116.00	\$ 216.00	\$ 72.00
0.3	Rodriguez, G.	\$ 315.00	\$ 94.50	\$ -	\$ -	\$ -	\$ -	\$ 94.50	\$ -
3.6	Herren, A.	\$ 157.50	\$ 567.00	\$ 315.00	\$ -	\$ -	\$ 94.50	\$ 157.50	\$ -
7.9			\$ 2,101.50	\$ 351.00	\$ -	\$ -	\$ 1,210.50	\$ 468.00	\$ 72.00

SEC - PWCG Trust
August 2022

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	Billing Category Allocation					
						A	B	C	D	E	F
8/1/2022	Conferred with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
8/2/2022	Corresponded with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
8/3/2022	Pay invoice.	0.1	Hebrank, T.	\$ 360.00	\$ 36.00				0.1		
8/3/2022	Downloaded and forwarded accounts payable invoice. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
8/4/2022	Review and process weekly mail.	0.3	Hebrank, T.	\$ 360.00	\$ 108.00				0.3		
8/5/2022	Corresponded with Atty Fates re investor claim matters; reviewed same. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50					0.2	
8/9/2022	Corresponded with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
8/10/2022	Investor correspondence. Prepare investor monthly case update. Review and post legal filings.	0.8	Hebrank, T.	\$ 360.00	\$ 288.00	0.2		0.6			
8/10/2022	Conferred with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
8/10/2022	Investor com: Reviewed case update and coordinated posting. (0.2)	0.2	Rodriguez, G.	\$ 315.00	\$ 63.00	0.2					
8/11/2022	Corresponded with three (3) and corresponded with one (1) investor(s) re case updates and claim matters; corresponded with T. Hebrank re same. (.4)	0.4	Herren, A.	\$ 157.50	\$ 63.00	0.4					
8/12/2022	Corresponded with two (2) and corresponded with one (1) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
8/15/2022	Review and process weekly mail. Review, make premium payments. Deliver FedEx.	1.0	Hebrank, T.	\$ 360.00	\$ 360.00				1.0		
8/15/2022	Corresponded with one (1) and corresponded with one (1) investor(s) re case updates and claim matters; corresponded with T. Hebrank and G. Rodriguez re same. (.2) Prepared FedEx labels and transmittals for policy premium payments; corresponded with T. Hebrank re same. (.2)	0.4	Herren, A.	\$ 157.50	\$ 63.00	0.2			0.2		
8/15/2022	Investor com: discussion re tax payments made by receivership, general tax treatment of life policies and prepared response to investor. (0.5)	0.5	Rodriguez, G.	\$ 315.00	\$ 157.50	0.5					
8/16/2022	Investor correspondence.	0.1	Hebrank, T.	\$ 360.00	\$ 36.00	0.1					
8/17/2022	Conferred with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
8/18/2022	Corresponded with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.1) Corresponded with Atty Fates re investor claim matters. (.2)	0.3	Herren, A.	\$ 157.50	\$ 47.25	0.1				0.2	
8/22/2022	Review of financial information, preparation for receiver's report.	0.6	Hebrank, T.	\$ 360.00	\$ 216.00			0.6			
8/22/2022	Corresponded with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.1) Downloaded and updated investor distributions cashed. (.2)	0.3	Herren, A.	\$ 157.50	\$ 47.25	0.1			0.2		
8/23/2022	Review financials. Prepare SFAR. Investor correspondence.	2.8	Hebrank, T.	\$ 360.00	\$ 1,008.00	0.1		2.7			
8/23/2022	Corresponded with Atty Fates and T. Hebrank re investor claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50					0.2	
8/24/2022	Finalize SFAR and update Receiver's Report. Correspondence with Atty Fates on cash position, Receiver's Report.	1.5	Hebrank, T.	\$ 360.00	\$ 540.00			1.2			0.3
8/24/2022	Conferred with one (1) and corresponded with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
8/25/2022	Accounts payable correspondence.	0.3	Hebrank, T.	\$ 360.00	\$ 108.00				0.3		
8/29/2022	Review and process mail.	0.6	Hebrank, T.	\$ 360.00	\$ 216.00				0.6		
8/29/2022	Corresponded with two (2) and corresponded with one (1) investor(s) re case updates and claim matters. (.2) Prepared FedEx labels and transmittals for policy premium payments; corresponded with T. Hebrank re same. (.4)	0.6	Herren, A.	\$ 157.50	\$ 94.50	0.2			0.4		
8/30/2022	Review and sign off on legal settlement. Make premium payments; deliver FedEx.	1.1	Hebrank, T.	\$ 360.00	\$ 396.00				0.8		0.3
8/31/2022	Investor correspondence. Resubmit wires.	0.3	Hebrank, T.	\$ 360.00	\$ 108.00	0.1			0.2		

8/31/2022	Conferred with two (2) and corresponded with two (2) and corresponded with one (1) investor(s) re case updates and claim matters. (.6) Reviewed and forwarded accounts payable invoices. (.1) Corresponded with T. Hebrank re claim matters; conferred with investor re same. (.2)	0.9	Herren, A.	\$ 157.50	\$ 141.75	0.6			0.1	0.2	
Grand Total		14.7			\$ 4,349.25	4.0	0.0	5.1	4.2	0.8	0.6

9.5	Hebrank, T.	\$ 360.00	\$ 3,420.00	\$ 180.00	\$ -	\$ 1,836.00	\$ 1,188.00	\$ -	\$ 216.00
0.7	Rodriguez, G.	\$ 315.00	\$ 220.50	\$ 220.50	\$ -	\$ -	\$ -	\$ -	\$ -
4.5	Herren, A.	\$ 157.50	\$ 708.75	\$ 441.00	\$ -	\$ -	\$ 141.75	\$ 126.00	\$ -
14.7			\$ 4,349.25	\$ 841.50	\$ -	\$ 1,836.00	\$ 1,329.75	\$ 126.00	\$ 216.00

SEC - PWCG Trust
September 2022

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	Billing Category Allocation					
						A	B	C	D	E	F
9/6/2022	Review and process weekly mail. Investor correspondence.	0.6	Hebrank, T.	\$ 360.00	\$ 216.00	0.1			0.5		
9/6/2022	Corresponded with one (1) investor(s) re case updates and claim matters. (.1) Corresponded with T. Hebrank and Atty Fates re MPC settlement. (.2)	0.3	Herren, A.	\$ 157.50	\$ 47.25	0.3					
9/7/2022	Investor correspondence. Review filings, post to website.	0.3	Hebrank, T.	\$ 360.00	\$ 108.00	0.3					
9/7/2022	Corresponded with two (2) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
9/8/2022	Addn website update. Update wire payee info.	0.3	Hebrank, T.	\$ 360.00	\$ 108.00	0.3					
9/9/2022	Locate and provide MPC settlement doc information.	0.4	Hebrank, T.	\$ 360.00	\$ 144.00						0.4
9/12/2022	Review and process weekly mail. Investor correspondence.	0.6	Hebrank, T.	\$ 360.00	\$ 216.00	0.1			0.5		
9/13/2022	Corresponded with one (1) investor(s) re case updates and claim matters. (.1)	0.1	Herren, A.	\$ 157.50	\$ 15.75	0.1					
9/13/2022	Investor com: discussion with investor re status of case. (0.5)	0.5	Rodriguez, G.	\$ 315.00	\$ 157.50	0.5					
9/14/2022	Review and send premium payments. Deliver FedEx.	0.7	Hebrank, T.	\$ 360.00	\$ 252.00				0.7		
9/14/2022	Prepared FedEx labels and transmittals for policy premium payments; corresponded with T. Hebrank re same. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50				0.2		
9/16/2022	Corresponded with Atty Fates re investor assignment of claim; updated account re same. (.3)	0.3	Herren, A.	\$ 157.50	\$ 47.25					0.3	
9/19/2022	Review and process weekly mail. Prepare monthly investor case update.	1.1	Hebrank, T.	\$ 360.00	\$ 396.00			0.6	0.5		
9/20/2022	Investor com: Reviewed case update and coordinated same. (0.2)	0.2	Rodriguez, G.	\$ 315.00	\$ 63.00	0.2					
9/21/2022	Conferred with one (1) and corresponded with thirteen (13) investor(s) re case updates and claim matters. (1.6) Reviewed and updated investor claim; corresponded with Atty Fates re same. (.3)	1.9	Herren, A.	\$ 157.50	\$ 299.25	1.6				0.3	
9/26/2022	Review and process weekly mail. Pay invoice.	0.6	Hebrank, T.	\$ 360.00	\$ 216.00				0.6		
9/28/2022	Conferred with two (2) and corresponded with two (2) investor(s) re case updates and claim matters. (.7)	0.7	Herren, A.	\$ 157.50	\$ 110.25	0.7					
9/28/2022	Investor com: discussion with investor re IRA. (0.6)	0.6	Rodriguez, G.	\$ 315.00	\$ 189.00	0.6					
9/29/2022	Review and make premium payments. Correspondence on settlement agreement and review updated financials.	0.8	Hebrank, T.	\$ 360.00	\$ 288.00				0.4		0.4
9/29/2022	Prepared FedEx labels and transmittals for policy premium payments; corresponded with T. Hebrank re same. (.4)	0.4	Herren, A.	\$ 157.50	\$ 63.00				0.4		
9/29/2022	Investor com: updated investor contact information. (0.2)	0.2	Rodriguez, G.	\$ 315.00	\$ 63.00	0.2					
9/30/2022	Make premium check payments and drop off FedEx. Assist ITM with documentation.	0.7	Hebrank, T.	\$ 360.00	\$ 252.00				0.7		
9/30/2022	Conferred with one (1) investor(s) re case updates and claim matters. (.2)	0.2	Herren, A.	\$ 157.50	\$ 31.50	0.2					
Grand Total		11.9			\$ 3,345.75	5.4	0.0	0.6	4.5	0.6	0.8

6.1	Hebrank, T.	\$ 360.00	\$ 2,196.00	\$ 288.00	\$ -	\$ 216.00	\$ 1,404.00	\$ -	\$ 288.00
1.5	Rodriguez, G.	\$ 315.00	\$ 472.50	\$ 472.50	\$ -	\$ -	\$ -	\$ -	\$ -
4.3	Herren, A.	\$ 157.50	\$ 677.25	\$ 488.25	\$ -	\$ -	\$ 94.50	\$ 94.50	\$ -
11.9			\$ 3,345.75	\$ 1,248.75	\$ -	\$ 216.00	\$ 1,498.50	\$ 94.50	\$ 288.00

EXHIBIT “B”

SEC - PWCG Trust
Fee Application #19 Summary - Fees

Date		Hours	Personnel	Per Hour	Total Fee	Billing Category Allocation					
						A	B	C	D	E	F
July 22 Fees	4.0	Hebrank, T.	\$ 360.00	\$ 1,440.00	\$ 36.00	\$ -	\$ -	\$ 1,116.00	\$ 216.00	\$ 72.00	
	0.3	Rodriguez, G.	\$ 315.00	\$ 94.50	\$ -	\$ -	\$ -	\$ -	\$ 94.50	\$ -	
	3.6	Herren, A.	\$ 157.50	\$ 567.00	\$ 315.00	\$ -	\$ -	\$ 94.50	\$ 157.50	\$ -	
	7.9			\$ 2,101.50	\$ 351.00	\$ -	\$ -	\$ 1,210.50	\$ 468.00	\$ 72.00	
Aug 22 Fees	9.5	Hebrank, T.	\$ 360.00	\$ 3,420.00	\$ 180.00	\$ -	\$ 1,836.00	\$ 1,188.00	\$ -	\$ 216.00	
	0.7	Rodriguez, G.	\$ 315.00	\$ 220.50	\$ 220.50	\$ -	\$ -	\$ -	\$ -	\$ -	
	4.5	Herren, A.	\$ 157.50	\$ 708.75	\$ 441.00	\$ -	\$ -	\$ 141.75	\$ 126.00	\$ -	
	14.7			\$ 4,349.25	\$ 841.50	\$ -	\$ 1,836.00	\$ 1,329.75	\$ 126.00	\$ 216.00	
Sept 22 Fees	6.1	Hebrank, T.	\$ 360.00	\$ 2,196.00	\$ 288.00	\$ -	\$ 216.00	\$ 1,404.00	\$ -	\$ 288.00	
	1.5	Rodriguez, G.	\$ 315.00	\$ 472.50	\$ 472.50	\$ -	\$ -	\$ -	\$ -	\$ -	
	4.3	Herren, A.	\$ 157.50	\$ 677.25	\$ 488.25	\$ -	\$ -	\$ 94.50	\$ 94.50	\$ -	
	11.9			\$ 3,345.75	\$ 1,248.75	\$ -	\$ 216.00	\$ 1,498.50	\$ 94.50	\$ 288.00	
Grand Total	19.6	Hebrank, T.	\$ 360.00	\$ 7,056.00	\$ 504.00	\$ -	\$ 2,052.00	\$ 3,708.00	\$ 216.00	\$ 576.00	
	2.5	Rodriguez, G.	\$ 315.00	\$ 787.50	\$ 693.00	\$ -	\$ -	\$ -	\$ 94.50	\$ -	
	12.4	Herren, A.	\$ 157.50	\$ 1,953.00	\$ 1,244.25	\$ -	\$ -	\$ 330.75	\$ 378.00	\$ -	
	34.5	Total		\$ 9,796.50	\$ 2,441.25	\$ -	\$ 2,052.00	\$ 4,038.75	\$ 688.50	\$ 576.00	

SEC - PWCG Trust
Fee Application #19 Summary - Hours

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	Billing Category Allocation					
						A	B	C	D	E	F
July 22 Hours		4.0	Hebrank, T.			0.1	0.0	0.0	3.1	0.6	0.2
		0.3	Rodriguez, G.			0.0	0.0	0.0	0.0	0.3	0.0
		3.6	Herren, A.			2.0	0.0	0.0	0.6	1.0	0.0
		7.9				2.1	0.0	0.0	3.7	1.9	0.2
Aug 22 Hours		9.5	Hebrank, T.			0.5	0.0	5.1	3.3	0.0	0.6
		0.7	Rodriguez, G.			0.7	0.0	0.0	0.0	0.0	0.0
		4.5	Herren, A.			2.8	0.0	0.0	0.9	0.8	0.0
		14.7				4.0	0.0	5.1	4.2	0.8	0.6
Sept 22 Hours		6.1	Hebrank, T.			0.8	0.0	0.6	3.9	0.0	0.8
		1.5	Rodriguez, G.			1.5	0.0	0.0	0.0	0.0	0.0
		4.3	Herren, A.			3.1	0.0	0.0	0.6	0.6	0.0
		11.9				5.4	0.0	0.6	4.5	0.6	0.8
Grand Total		19.6	Hebrank, T.			1.4	0.0	5.7	10.3	0.6	1.6
		2.5	Rodriguez, G.			2.2	0.0	0.0	0.0	0.3	0.0
		12.4	Herren, A.			7.9	0.0	0.0	2.1	2.4	0.0
		34.5				11.5	0.0	5.7	12.4	3.3	1.6

EXHIBIT "C"

SEC - PWCG Trust
Fee Application #19 - Costs

Date	Description	Expense	Personnel
7/31/2022	Website & Mailchimp	\$ -	E3
7/31/2022	FedEx	\$ 105.32	E3
7/31/2022	Postage	\$ 7.70	E3
7/31/2022	Copies 115 @ .15	\$ 17.25	E3
	Total	\$ 130.27	
8/31/2022	Website & Mailchimp	\$ 480.00	E3
8/31/2022	FedEx	\$ 103.17	E3
8/31/2022	Postage	\$ 4.40	E3
8/31/2022	Copies 161 @ .15	\$ 24.15	E3
	Total	\$ 611.72	
9/30/2022	Website & Mailchimp	\$ 480.00	E3
9/30/2022	FedEx	\$ 102.88	E3
9/30/2022	Postage	\$ 11.00	E3
9/30/2022	Copies 168 @ .15	\$ 25.20	E3
	Total	\$ 619.08	
	Grand Total	\$ 1,361.07	

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

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 07/01/22 TO 09/30/22

STANDARDIZED FUND ACCOUNTING REPORT for PWCG Trust - Cash Basis

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

Reporting Period 07/01/22 to 09/30/22

FUND ACCOUNTING (See instructions):			
	Detail	Subtotal	Grand Total
Line 1 Beginning Balance (As of 07/01/22):	2,997,672		2,997,672
<i>Increases in Fund Balance:</i>			
Line 2 Business Income			-
Line 3 Policy Maturities	2,540,962		2,540,962
Line 4 Interest/Dividend Income	562		562
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):	5,539,196		5,539,196
<i>Decreases in Fund Balance:</i>			
Line 9 Disbursements to Investors	(20,700)		(20,700)
Line 10 Disbursements to Receivership Operations			
Line 10a Disbursement to Receiver or Other Professionals	-		-
Line 10b Business Asset Expenses	(1,718,147)		(1,718,147)
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	-		(1,718,147)
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):			(1,738,847)
Line 13 Ending Balance (As of 09/30/21):			3,800,349

STANDARDIZED FUND ACCOUNTING REPORT for PWCG Trust - Cash Basis

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

Reporting Period 07/01/22 to 09/30/22

Line 14 Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents		3,800,349
Line 14b	Investments		-
Line 14c	Other Assets or Uncleared Funds		-
Total Ending Balance of Fund - Net Assets			3,800,349
OTHER SUPPLEMENTAL INFORMATION:			
		Detail	Subtotal
Report of Items NOT to be Paid by the Fund:			Grand Total
Line 15 Disbursement for Plan Administration Expenses Not Paid by the Fund:			
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		-	-
Total Plan Developmental Expenses Not Paid by the Fund			-
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		-	-
Total Plan Implementation Expenses Not Paid by the Fund			-
Line 15c Tax Administrator Fees & Bonds Not Paid by the Fund			
Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16 Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses/CRIS Fees	-	-
Line 16b	Federal Tax Payments	-	-
Total Disbursement to Court/Other Not Paid by the Fund:			-
Line 17 DC & State Tax Payments			
		-	-
Line 18 No. of Claims:			
Line 18a	# of Claims Received This Reporting Period.....		1,548
Line 18b	# of Claims Received Since Inception of Fund.....		1,548
Line 19 No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid this Reporting Period.....		1548
Line 19b	# of Claimants/Investors Paid Since Inception of Fund.....		1548

Receiver:

By:

Thomas C. Hebrank

Court-Appointed Receiver

Date:

1-6-23