# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

# SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 8:20-cv-325-T-35AEP

BRIAN DAVISON, BARRY M. RYBICKI, EQUIALT LLC, EQUIALT FUND, LLC EQUIALT FUND II, LLC, EQUIALT FUND III, LLC, EA SIP, LLC,

Defendants,

and

128 E. DAVIS BLVD., LLC; et al.,

Relief Defendants.

# RECEIVER'S FIFTH QUARTERLY FEE APPLICATION FOR ORDER AWARDING FEES, COSTS, AND REIMBURSEMENT OF <u>COSTS TO RECEIVER AND HIS PROFESSIONALS</u>

Burton W. Wiand, the Court-appointed Receiver over the corporate

Defendants and all Relief Defendants (the "Receiver" and the "Receivership"

or "Receivership Estate") pursuant to the Court's Order dated February 14,

2020 (Doc. 11) (the "Order Appointing Receiver"),<sup>1</sup> respectfully submits this Fifth Quarterly Fee Application to the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and his professionals. This Application covers all fees and costs incurred from January 1, 2021 through March 31, 2021. A Standardized Accounting Report (the "Accounting Report") from January 1, 2021 through March 31, 2021 is attached as <u>Exhibit 1.<sup>2</sup></u>

Since the appointment of the Receiver, he and those he has retained to assist him have engaged in substantial and continuing efforts for the benefit of the Receivership. During the time covered by this Application, among other things, the Receiver and his professionals have done the following:

- Worked extensively with SEC and counsel for Brian Davison toward resolution of disgorgement amount and settlement of Receiver's claims;
- Continued to pursue claims against EquiAlt law firms. Began preliminary efforts for proposed mediation in August and defended against Law Firm Defendants' efforts to undermine Receiver's claims by seeking to thwart Receiver's choice of forum and move California litigation to Florida;

<sup>&</sup>lt;sup>1</sup> The "Receiver" and the "Receivership" or "Receivership Estate" has been expanded to include not only the Corporate and Relief Defendants but also the following entities: EquiAlt Qualified Opportunity Zone Fund, LP; EquiAlt QOZ Fund GP, LLC; EquiAlt Secured Income Portfolio REIT, Inc.; EquiAlt Holdings LLC; EquiAlt Property Management LLC; and EquiAlt Capital Advisors, LLC (Doc. 184, at 6-7) and EquiAlt Fund I, LLC (Doc 284).

<sup>&</sup>lt;sup>2</sup> The Securities and Exchange Commission ("SEC" or the "Commission") provided the Receiver with detailed Billing Instructions for Receivers in Civil Actions Commenced by the Commission (the "Billing Instructions"). The Accounting Report is one of the requirements contained in the Billing Instructions.

- Sought and obtained approval from the Court for the sale of the following properties and garnered these net proceeds:
   2111 W. St. Louis Street, Tampa \$196,000;
- Completed the construction of and entered into sales agreement for 3914½ North Ridge Avenue, Tampa \$820,000 (closed April 15, 2021);
- Completed the construction of and entered into an agreement to sell 2 Bahamas Circle property in Tampa for \$3,950,000;
- In January 2021, Receiver sought the settlement of clawback claims of false profits received by certain EquiAlt investors;
- In February 2021, the Receiver filed clawback claims against 123 EquiAlt investors who received \$2,729,829 in false profits;
- Secured approximately \$1.2 million in provisional settlements with investors who received false profits;
- In February 2021, the Receiver filed fraudulent transfer/unjust enrichment claims against 20 sales agents and their corresponding corporate entities seeking recovery of commissions paid in the total amount of \$18,934,950;
- Successfully moved the Court to expand the Receivership to include EquiAlt Fund I (now defunct entity) and those properties which were still titled in the name of EquiAlt Fund I;
- Engaged in extensive efforts to market additional real estate properties and develop plans for marketing properties in an efficient and cost-effective manner;
- Continued efforts to sell exotic automobiles;
- Entered into agreements for the continued renovation of Jasmine Way property in Clearwater;
- Worked extensively with partners on the operations of Commerce Brewing and related entities;

- Continued development plans for St. Petersburg commercial land;
- Continued ongoing efforts to propose claims process to the Court as well as consolidation of Receivership operations;
- Entered into a listing agreement to sell New York City condominium for a listing price of \$2,395,000; and
- Continued work to streamline Receivership administration and manage EquiAlt operations, including maintenance and leasing of over 300 real estate properties.

The above activities are discussed in more detail in the Receiver's Fifth Quarterly Status Report which was filed on June 1, 2021 (Doc. 319) (the "Quarterly Status Report"). The Quarterly Status Report contains comprehensive and detailed information regarding the case background and status; the recovery of assets; financial information about Receivership Entities; the Receiver's proposed course of action regarding assets in the Receivership Estate; the potential establishment of a claims process; and related (or contemplated) litigation involving Receivership Entities. The Quarterly Status Report addresses all activity that resulted in the fees and costs sought in this motion and is incorporated herein.

#### **Case Background**

As of the date of filing this Application, the Court has appointed Burton W. Wiand as Receiver over the assets of the following entities:

a) Defendants EquiAlt LLC; EquiAlt Fund, LLC; EquiAlt Fund II, LLC; EquiAlt Fund III, LLC; and EA SIP, LLC;

- b) Relief Defendants 128 E. Davis Blvd, LLC; 310 78th Ave, LLC; 551 3D Ave S, LLC; 604 West Azeele, LLC; 2101 W. Cypress, LLC; 2112 W. Kennedy Blvd, LLC; 5123 E. Broadway Ave, LLC; Blue Waters TI, LLC; BNAZ, LLC; BR Support Services, LLC; Bungalows TI, LLC; Capri Haven, LLC; EA NY, LLC; EquiAlt 519 3rd Ave S., LLC; McDonald Revocable Living Trust; Silver Sands TI, LLC; TB Oldest House Est. 1842, LLC;
- c) EquiAlt Qualified Opportunity Zone Fund, EquiAlt QOZ Fund GP, LLC, EquiAlt Secured Income Portfolio REIT, Inc., EquiAlt Holdings LLC, EquiAlt Property Management LLC, and EquiAlt Capital Advisors, LLC ("REIT and QOZ Entities"); and
- d) EquiAlt Fund I LLC.

See Docs. 11, 184, and 284. The foregoing entities are collectively referred to as the "Receivership Entities." On February 11, 2020, the Securities and Exchange Commission ("SEC") filed a complaint (Doc. 1) against the Defendants and Relief Defendants. The complaint charges the Defendants with violations of the federal securities laws and regulations in connection with a real estate Ponzi scheme. The SEC alleges that from January 2010 to November 2019, EquiAlt raised more than \$170 million from approximately 1100 investors to invest in three separate real estate funds. The SEC alleges that EquiAlt misrepresented the use of the proceeds of the investments and that Defendants Davison and Rybicki, who controlled the operations of the corporate Defendants, misappropriated monies from EquiAlt to the detriment of the investors. As directed by the Court (see Doc. 11  $\P$  2) and discussed in the earlier Quarterly Status Reports, the Receiver is conducting an independent investigation of the Receivership Entities and their operations.

There is abundant evidence that supports the allegations that the Defendants were operating a fraudulent investment scheme.

#### **Professional Services Rendered and Costs Incurred**

The Order Appointing Receiver authorizes the Receiver to "solicit persons and entities ('Retained Personnel') to assist him in carrying out the duties and responsibilities described in this Order" and states that the "Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates," subject to approval by the Court. See Doc. 11 ¶¶ 31, 32. The Order Appointing Receiver also requires that the Receiver obtain the Court's authorization of the retention of any Retained Personnel. See Doc. 11 ¶ 31. Paragraph 6 of the Order Appointing Receiver provides for the Receiver to engage persons "to assist the Receiver in carrying out the Receiver's duties and responsibilities, including . . . accountants . . . ." To that end, the Receiver retained PDR CPAs ("PDR") to assist with general accounting and tax services for the Receivership as well as provide accounting oversight for the operations of the Receivership entities. The Receiver filed an unopposed motion to approve the retention of PDR on April 9, 2020, which the Court granted on May 11, 2020 (Doc. 85).

The Order Appointing Receiver also specifically authorized the Receiver to retain (1) Wiand Guerra King P.A., now known as Guerra King

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P.A., ("GK") to provide legal services; (2) Yip Associates ("Yip") to provide forensic accounting services; (3) E-Hounds, Inc. ("E-Hounds") to provide computer forensic services; (4) RWJ Group, LLC ("RWJ") to provide asset management and investigative services;<sup>3</sup> (5) Freeborn & Peters LLP ("Freeborn") to provide legal services relating to information technology; (6) Baskin PLC ("Baskin"),<sup>4</sup> legal counsel in Arizona, to assist in the service of the Order Appointing Receiver and securing records and assets; and (7) Digital Acuity LLC ("Digital Acuity"), forensic investigators in Arizona, to assist in securing records.<sup>5</sup> See Doc. 11 ¶¶ 3, 16.<sup>6</sup> (Doc. 88). On March 10, 2021, the Receiver filed a motion for leave to retain Johnson, Cassidy,

<sup>&</sup>lt;sup>3</sup> RWJ is no longer providing services to this Receivership at this time.

<sup>&</sup>lt;sup>4</sup> Baskin PLC was formerly Baskin Richards PLC.

<sup>&</sup>lt;sup>5</sup> Digital Acuity aided the Receiver with the imaging of the hard drives and other computer equipment at the EquiAlt offices in Arizona. This was a one-time expense for the Receivership, and thus, Digital Acuity is no longer providing services to the Receivership.

<sup>&</sup>lt;sup>6</sup> On June 26, 2020, the Receiver filed a motion for leave to retain Johnson Pope Bokor Ruppel & Burns, LLP ("Johnson Pope") on a contingency fee basis to investigate and pursue claims against law firms that provided services to EquiAlt, LLC or another Receivership Entity (Doc. 121), which the Court granted on July 1, 2020 (Doc. 127). In addition to agreeing to work on a contingency fee basis as outlined in the motion to retain Johnson Pope, the firm has also agreed to advance costs subject to reimbursement from any recovery with the exception of costs associated with E-Hounds and Yip Associates. Any costs incurred by Yip Associates and E-Hounds in connection with Johnson Pope's investigation and any eventual litigation will be included in the invoices for these two professionals in the Receiver's fee applications. As with any contingency fee arrangement, Johnson Pope is only entitled to payment if it procures a successful resolution of the Receiver's potential claims.

Newlon & DeCort ("JCND") as co-counsel (Doc. 278).<sup>7</sup> The Court granted this motion on March 26, 2021 (Doc. 282). All of the foregoing and PDR are collectively, the "Professionals."

As described above and more fully in the Quarterly Status Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and recover additional assets, and analyze investor information for an eventual claims process and litigation. The Receivership is also selling certain assets and properties and preserving those proceeds for the benefit of the victim investors. While the Receiver and his professionals are investigating and locating and preserving assets for the benefit of defrauded investors, they are also continuing to operate the Receivership Entities. This case involves over 1100 investors and over \$170 million in investments. The Receiver is responsible for the active management of over 300 properties, the assessment of pending construction and maintenance projects, as well as supervising employees and property managers. The services provided by the

<sup>&</sup>lt;sup>7</sup> Katherine Donlon, formerly of Guerra King, has been acting as lead counsel for the Receiver for this matter. Ms. Donlon left Guerra King and joined Johnson Cassidy, a litigation firm with extensive experience in federal court practice. Other professionals at Guerra King who have also been providing legal services to the Receiver for this matter have remained at Guerra King. Given Ms. Donlon's knowledge regarding this matter, the Receiver determined that it is in the best interests of the Receivership and the defrauded investors that both Ms. Donlon and other professionals at her new firm and the professionals at Guerra King continue to provide legal services to the Receiver. The Receiver does not anticipate that there will be duplication of services provided by the two firms.

Receiver and his professionals are for the benefit of aggrieved investors, creditors, and other interested parties.

#### I. <u>The Receiver.</u>

The Receiver requests the Court award him fees for the professional services rendered from January 1, 2021 through March 31, 2021, in the amount of \$37,836.00. The standard hourly rate the Receiver charges clients in private litigation is \$500. However, the Receiver agreed, for purposes of his appointment as the Receiver, that his hourly rate would be reduced to \$360, representing nearly a thirty percent discount off the standard hourly rate which he charges clients in comparable matters. This rate was set forth in the Receiver's submission to the SEC. *See* Doc. 6, Ex. 1.

The Receiver commenced services immediately upon his appointment. The Receiver has billed his time for these activities in accordance with the Billing Instructions, which request that this motion contain a narrative of each "business enterprise or litigation matter" for which outside professionals have been employed. The Billing Instructions identify each such business enterprise or litigation matter as a separate "project." Further, the Billing Instructions request that time billed for each project be allocated to one of several Activity Categories.<sup>8</sup> In addition to the work of the Receivership, the Receiver created two projects related to clawback litigation commenced on February 13, 2021.

#### A. The Receivership.

For the time covered by this motion, the work of the Receiver and GK focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and analyzing investor information for an eventual claims process and litigation. These activities of the Receiver are set forth in detail in the Quarterly Status Report. Doc. 319. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as <u>Exhibit 2</u>. The Receiver's time and fees for services rendered for

<sup>&</sup>lt;sup>8</sup> The Activity Categories set forth by the Commission in the Billing Instructions are as follows: (1) Asset Analysis and Recovery, which is defined as identification and review of potential assets including causes of action and non-litigation recoveries; (2) Asset Disposition, which is defined as sales, leases, abandonment and related transaction work (where extended series of sales or other disposition of assets is contemplated, the Billing Instructions provide that a separate category should be established for each major transaction); (3) Business Operations, which is defined as issues related to operation of an ongoing business; (4) Case Administration, which is defined as coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.; (5) Claims Administration and Objections, which is defined as expenses in formulating, gaining approval of and administering any claims procedure; and (6) Employee Benefits/Pensions, which is defined as review issues such as severance, retention, 401K coverage and continuance of pension plan. The Billing Instructions provide that time spent preparing motions for fees may not be charged to the Receivership Estate. In accordance with these instructions, the Receiver created an additional Activity Category for work on fees motions and has accounted for time spent on such work but has not charged any amount for that work.

each Activity Category from January 1, 2021 through March 31, 2021, are as follows:

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	32.40	\$11,664.00
Asset Analysis and		
Recovery	29.20	\$10,512.00
Business Operations	30.50	\$10,980.00
Case Administration	1.70	\$612.00
Claims Administration	1.00	\$360.00
TOTAL	94.80	\$34,128.00

# <u>Receivership</u> Receiver's Time and Fees for Services Rendered

#### **B.** Discrete Projects.

In conjunction with the Receivership, the following two discrete projects have been formally commenced by the Receiver.

# 1. Recovery of False Profits from Investors.

This is a project involving the Receiver's efforts to recover false profits from investors whose purported accounts received monies in an amount that exceeded their investments. (*See also* Doc. 319 at 31.) These purported profits were false because they were not based on any investment gain, but rather were fruits of a Ponzi scheme that consisted of funds of new and existing investors. The Receiver engaged in a pre-suit resolution process with investors who received such false profits. The pre-suit resolution process was fruitful, as discussed in the Quarterly Status Report. However, many investors did not take advantage of the opportunity afforded by this process. On January 20, 2021, the Receiver moved the Court for authority to file clawback litigation. Doc. 255. The SEC did not object to the motion and no oppositions were filed. On February 13, 2021, the Receiver filed a clawback complaint against 123 EquiAlt investors who received \$2,729,829 in false profits combined. The Receiver proceeded with filing this complaint to avoid any possible statute of limitations concerns. A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2021 through March 31, 2021 is attached as <u>Exhibit 3</u>. The Receiver's time and fees for services rendered for each Activity Category are as follows:

<u>Recovery from Investors</u> Receiver's Time and Fees for Services Rendered

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	7.70	\$2,772.00
TOTAL	7.70	\$2,772.00

#### 2. Clawback Litigation Against Non-Investors.

This is a project involving the Receiver's clawback litigation against former principals and employees of EquiAlt and sales agents who received commissions for the sale of EquiAlt debentures. (*See also* Doc. 319 at 32.) On January 28, 2021, the Receiver moved the Court for authority to file this clawback litigation. Doc. 258. The SEC did not object to the motion and no oppositions were filed. On February 13, 2021, the Receiver filed a clawback complaint against 20 sales agents and their corresponding 17 corporate entities for the recovery of commissions paid for the sale of EquiAlt debentures in the total amount of \$18,934,950. The Receiver proceeded with filing this complaint to avoid any possible statute of limitations concerns. A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2021 through March 31, 2021 is attached as <u>Exhibit</u> <u>4</u>. The Receiver's time and fees for services rendered for each Activity Category are as follows:

<u>Clawback Litigation Against Non-Investors</u> Receiver's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	2.60	\$936.00
TOTAL	2.60	\$936.00

#### II. <u>Guerra King P.A.</u>

The Receiver requests the Court award GK fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amounts of \$111,566.50 and \$3,397.02, respectively. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, GK's attorneys and paralegals have agreed to reduce their standard rates as provided in the fee schedule attached as <u>Exhibit 5</u>. As shown in the fee schedule, GK agreed to limit its partner rates, which typically range from \$315 to \$475, to \$350 per hour and its associate rates, which range from \$235 to \$290, to \$240 per hour. Ex. 5. GK began providing services immediately upon the appointment of the Receiver. The activities of GK for the time covered by this Application are set forth in the Quarterly Status Report. *See* Doc. 319. GK has billed time for these activities in accordance with the Billing Instructions.

#### A. The Receivership.

As discussed above, the work of the Receiver and GK focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and analyzing investor information for the eventual claims process and litigation. A copy of the statement summarizing the services rendered and costs incurred by GK from January 1, 2021 through March 31, 2021, is attached as <u>Exhibit 6</u>. GK's time and fees for services rendered on this matter for each Activity Category are as follows:

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	73.40	\$16,121.50
Asset Analysis and		
Recovery	118.40	\$33,014.00
<b>Business Operations</b>	77.90	\$14,802.50
Case Administration	92.80	\$14,384.50
Claims Administration	1.30	\$281.00

<u>Receivership</u> GK's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
TOTAL	363.80	\$78,603.50

A summary of the professionals' hours rendered during the time covered by

this Application is set forth below.

		Yrs.	Billed		
Professional	Position	Exp.	Hours	Rate	Total
Katherine Donlon					
(KCD)	Partner	25	58.60	\$350.00	\$20,510.00
Jared J. Perez (JJP)	Partner	15	1.50	\$350.00	\$525.00
Maya Lockwood (MML)	Of Counsel	21	1.30	\$240.00	\$312.00
Max McKinley (RMM)	Associate	5	156.50	\$240.00	\$37,560.00
Jeffrey Rizzo (JR)	Paralegal		61.40	\$135.00	\$8,289.00
Amanda Stephens (AS)	Paralegal		83.80	\$135.00	\$11,313.00
Mary Gura (MG)	Paralegal		.70	\$135.00	\$94.50
Fees					\$78,603.50
Disbursements					\$2,593.02
Total			363.80		\$81,196.52

In addition to legal fees, GK has advanced costs of \$2,593.02 as summarized below.

Costs	Total
Photocopies	\$170.10
Telephone	\$38.48
Online Research	\$321.09
Delivery	
Services	\$150.50
Court Fees	\$12.50
Outside Printing	\$202.85
Web-Related	\$1,525.00
Other	\$172.50
Total	\$2,593.02

The "Other" category of costs includes costs related the publication of a notice for real estate sold during this quarter.

#### **B.** Discrete Projects.

In conjunction with the Receivership, the following two discrete projects have been formally commenced by the Receiver.

# 1. Recovery of False Profits from Investors.

As discussed above in Section I.B.1, this is a project involving the Receiver's efforts to recover false profits from investors whose purported accounts received monies in an amount that exceeded their investments. (*See also* Doc. 319 at 31.) These purported profits were false because they were not based on any trading or investment gain, but rather were fruits of a Ponzi scheme that consisted of funds of new and existing investors. A copy of the statement summarizing the services rendered and costs incurred by GK from January 1, 2021 through March 31, 2021 for this project is attached as <u>Exhibit 7</u>.<sup>9</sup> GK's time and fees for services rendered for each Activity Category are as follows:

<u>Recovery from Investors</u> GK's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and	132.00	\$29,753.50

 $<sup>^9\,</sup>$  The statement for this project includes costs of \$402.00 for filing the clawback complaint against EquiAlt investors who received false profits.

Recovery		
TOTAL	132.00	\$29,753.50

A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

		Yrs.	Billed		
Professional	Position	Exp.	Hours	Rate	Total
Katherine Donlon					
(KCD)	Partner	25	53.60	\$350.00	\$18,760.00
Maya Lockwood (MML)	Of Counsel	21	.10	\$240.00	\$24.00
Max McKinley (RMM)	Associate	5	3.80	\$240.00	\$912.00
Jeffrey Rizzo (JR)	Paralegal		5.20	\$135.00	\$702.00
Amanda Stephens (AS)	Paralegal		62.70	\$135.00	\$8,464.50
Mary Gura (MG)	Paralegal		6.60	\$135.00	\$891.00
Fees					\$29,753.50
Disbursements					\$402.00
Total			132.00		\$30,155.50

# 2. Clawback Litigation Against Non-Investors.

As discussed above in Section I.B.2, this is a project involving the Receiver's clawback litigation against former principals and employees of EquiAlt and sales agents who received commissions for the sale of EquiAlt debentures. (*See also* Doc. 319 at 32.) A copy of the statement summarizing the services rendered and costs incurred by GK from January 1, 2021 through March 31, 2021 for this project is attached as <u>Exhibit 8</u>.<sup>10</sup> GK's time and fees for services rendered for each Activity Category are as follows:

<sup>&</sup>lt;sup>10</sup> The statement for this project includes costs of \$402.00 for filing the clawback complaint against the individuals and entities who received commissions for the sale of EquiAlt debentures.

Clawback Litigation Against Non-Investors
<b>GK's Time and Fees for Services Rendered</b>

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	9.60	3,209.50
TOTAL	9.60	\$3,209.50

A summary of the professionals' hours rendered during the time covered by

this Application is set forth below.

		Yrs.	Billed		
Professional	Position	Exp.	Hours	Rate	Total
Katherine Donlon					
(KCD)	Partner	25	8.90	\$350.00	3,115.00
Amanda Stephens (AS)	Paralegal		.70	\$135.00	\$94.50
Fees					\$3,209.50
Disbursements					\$402.00
Total			1.90		\$3,611.50

# III. Johnson Cassidy Newlon & DeCort.

The Receiver requests the Court award JCND fees for professional services rendered and costs incurred from March 15, 2021 through March 31, 2021, in the amounts of \$12,333.50 and \$7,230.61, respectively. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, JCND's attorneys and paralegals have agreed to follow the reduced rates provided in the GK fee schedule. Ex. 5. JCND began providing services on March 15, 2021. The activities of JCND for the time covered by this Application are set forth in the Quarterly Status Report. *See*  Doc. 319. JCND has billed time for these activities in accordance with the Billing Instructions.

#### A. The Receivership.

JCND assisted the Receiver with the work of investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and analyzing investor information for the eventual claims process and litigation. A copy of the statement summarizing the services rendered and costs incurred by JCND from March 15, 2021 through March 31, 2021, is attached as <u>Exhibit 9</u>. JCND's time and fees for services rendered on this matter for each Activity Category are as follows:

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	4.00	\$1,314.00
Asset Analysis and		
Recovery	11.60	\$4,060.00
TOTAL	15.60	\$5,374.00

<u>Receivership</u> JCND's Time and Fees for Services Rendered

A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

		Yrs.	Billed		
Professional	Position	Exp.	Hours	Rate	Total
Katherine Donlon					
(KCD)	Partner	25	15.20	\$350.00	\$5,320.00
Mary Gura (MG)	Paralegal		0.40	\$135.00	\$54.00
Fees					\$5,374.00
Disbursements					\$.00
Total			15.60		\$5,374.00

# B. Discrete Projects.

In conjunction with the Receivership, the following two discrete projects have been formally commenced by the Receiver.

# 1. Recovery of False Profits from Investors.

As discussed above, this is a project involving the Receiver's efforts to recover false profits from investors whose purported accounts received monies in an amount that exceeded their investments. (*See also* Doc. 319 at 31.) A copy of the statement summarizing the services rendered and costs incurred by JCND from March 15, 2021 through March 31, 2021 for this project is attached as <u>Exhibit 10</u>. JCND's time and fees for services rendered for each Activity Category are as follows:

<u>Recovery from Investors</u>
JCND's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	32.40	\$5,707.00
TOTAL	32.40	\$5,707.00

A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

		Yrs.	Billed		
Professional	Position	Exp.	Hours	Rate	Total
Katherine					
Donlon (KCD)	Partner	25	6.20	\$350.00	\$2,170.00
Mary Gura (MG)	Paralegal		26.20	\$135.00	\$3,537.00
Fees					\$5,707.00
Disbursements					\$6,642.69
Total			32.40		\$12,349.69

In addition to legal fees, JCND has advanced costs of \$6,642.69 as summarized below.

Costs	Total
Photocopies	\$4,603.33
Postage	\$1,680.20
Online Research	\$359.16
Total	\$6,642.69

# 2. Clawback Litigation Against Non-Investors.

As discussed above, this is a project involving the Receiver's clawback litigation against former principals and employees of EquiAlt and sales agents who received commissions for the sale of EquiAlt debentures. (*See also* Doc. 319 at 32.) A copy of the statement summarizing the services rendered and costs incurred by JCND from March 15, 2021 through March 31, 2021 for this project is attached as <u>Exhibit 11</u>. JCND's time and fees for services rendered for each Activity Category are as follows:

<b><u>Clawback Litigation Against Non-Investors</u></b>
JCND's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	8.80	\$1,252.50
TOTAL	8.80	\$1,252.50

A summary of the professionals' hours rendered during the time covered by

this Application is set forth below.

		Yrs.	Billed		
Professional	Position	Exp.	Hours	Rate	Total
Katherine Donlon					
(KCD)	Partner	25	.30	\$350.00	\$105.00
Mary Gura (MG)	Paralegal		8.50	\$135.00	\$1,147.50
Fees					\$1,252.50
Disbursements					\$587.92
Total			8.80		\$1,840.42

In addition to legal fees, JCND has advanced costs of \$587.92 as summarized below.

Costs	Total
Photocopies	\$476.92
Postage	\$110.00
Total	\$587.92

#### IV. <u>Yip Associates.</u>

The Receiver requests the Court award Yip fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$170,256.50. Yip is a forensic accounting firm that specializes in insolvency and restructuring, Ponzi schemes, fraud investigations, insolvency taxation, business valuation, and litigation support. The firm is a leading boutique forensic accounting firm serving clients throughout the United States and abroad. Maria Yip, who founded the firm in 2008, has 27 years of experience in public and forensic accounting. Yip has been instrumental to the Receiver in investigating and analyzing the financial status of the Receivership Entities and the investment scheme at issue in this case. Additionally, Yip provides invaluable resources on the tracing of investor proceeds to various assets and properties. Further, Yip has substantially completed the process of gathering the investors' investments and distributions in order to initiate the claims process.

Ms. Yip is a partner in her firm and bills at \$495 per hour. Manager Christopher Cropley, Senior Associate Danny Zamorano, and Associate Renee Johnson continue to work diligently on this matter. Mr. Cropley has 12 years of experience and a billing rate of \$300, Mr. Zamorano has five years of experience and a billing rate of \$245, and Ms. Johnson has nine years of experience and a billing rate is \$195. Partner Kerry-Ann Rin, Director Hal Levenberg, and Associate Pamela Chuy also worked on this matter during this period. Ms. Rin, who has 15 years of experience, worked on this matter to assist Mr. Zamorano due to time constraints and billed at his billing rate of \$245, which is significantly discounted from her regular billing rate of \$400. Mr. Levenberg has 13 years of experience and will be taking over Mr. Zamorano's role in this case. Mr. Levenberg's billing rate is \$300, but he did not charge any fees for the nearly 12 hours he spent getting up to speed on this matter and transitioning the work. Ms. Chuy has 10 years of experience and a billing rate of \$195.

There were several days during this quarter where Yip professionals worked in excess of 12 hours per day in order to meet deadlines. As further accommodation to the Receiver, Yip agreed to cap billable hours to no more than 12 hours per day, resulting in an additional discount of \$9,150 for this quarter. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite <u>Exhibit 12</u>. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

		Yrs			
Professional	Position	Exp.	Hours	Rate	Total
Maria Yip (MMY)	Partner	27	7.80	\$495.00	\$3,861.00
Kerry-Ann Rin (KMR)	Partner	15	44.10	\$245.00	\$10,804.50
Hal A. Levenberg					
(HAL)	Director	13	11.90	\$300.00	\$0.00
Christopher M. Cropley					
(CMC)	Manager	12	60.40	\$300.00	\$18,120.00
Danny D. Zamorano	Senior				
(DDZ)	Associate	5	460.90	\$245.00	\$112,920.50
Pamela Chuy (PC)	Associate	10	19.50	\$195.00	\$3,802.50
Renee Johnson (RJ)	Associate	9	106.40	\$195.00	\$20,748.00
Fees					\$170,256.50

Yip Associates Time and Fees for Services Rendered

Disbursements			\$0.00
Total		711.00	\$170,256.50

Yip has worked diligently on the investor analysis for purposes of both the investor clawback claims as well as the claims process. The efforts of Yip during this quarter (and the last quarter of 2020) have been intensive and directed at preparing an individual analysis of each of the over 1200 investors' transactions in the Ponzi scheme. These efforts have been complicated by the fact that the EquiAlt records are far from straightforward. In many cases, transactions must be evaluated and confirmed from bank records and other source documents. This analysis is critical to the Receiver's clawback efforts and will be invaluable during the claims process.

In addition to the evaluation of investors transactions, Yip prepared an analysis of the funds paid by the Ponzi scheme to numerous vendors and unregistered sales agents who are the subject of claims by the Receiver for the return of Receivership funds. While this work has been extensive, considering that the Receivership involves a business that raised over \$180 million and operated for over nine years, the scope of the work in the Receiver's experience is not unanticipated. With this work completed, the forensic expense should be significantly less in the second quarter of 2021, with future expenses being primarily related to litigation activities. Notably, the fees charged by Yip this quarter decreased throughout the quarter with January being the highest at \$111,546.50 and the two subsequent months

significantly less at \$36,693.50 and \$22,016.50, respectively.

For the Court's convenience, below is a summary of the work provided

by Yip during this billing period:

# <u>January 2021</u>

- Continued preparation of investor analysis (summary of net winner investments and detailed schedules), including compilation and review of investor information, investment terms and investment history, and reconciliation of information obtained to bank activity of the Funds. Records reviewed and analyzed include:
  - Investor files maintained by EquiAlt personnel;
  - Investor website;
  - Monthly distribution lists maintained by EquiAlt personnel;
  - Files produced by IRA account trustees (e.g., Provident Trust Group, Vantage Retirement Plans, GoldStar Trust Company, IRA Services Trust, etc.); and
  - Accounting records and bank records.
- Prepared schedule of investors brought in by sales agent T. Elliot.
- Updated analysis of payments to and/or for the benefit of Brian D. Davison and Barry M. Rybicki.
- Prepared affidavit regarding commissions paid to sales agent A. Sears.
- Prepared schedules of commission payments to sales agents.

# February 2021

- Prepared investor analysis (summary of net loser investments), including compilation and review of investor information, investment terms and investment history, and reconciliation of information obtained to bank activity of the Funds. Records reviewed and analyzed include:
  - Investor files maintained by EquiAlt personnel;
  - Investor website;
  - Monthly distribution lists maintained by EquiAlt personnel;

- Files produced by IRA account trustees (e.g., Provident Trust Group, Vantage Retirement Plans, GoldStar Trust Company, IRA Services Trust, etc.); and
- Accounting records and bank records.
- Prepared analysis of aggregate financial results (2011 through 2019) for Fund I, Fund II, Fund III, and EA SIP.
- Finalized schedules of commission payments to sales agents.
- Updated cash flow analysis for debenture interest payments from 07/01/21 through 12/31/21.

# <u>March 2021</u>

- Continued preparation of investor analysis (summary of net loser investments), including compilation and review of investor information, investment terms and investment history, and reconciliation of information obtained to bank activity of the Funds. Records reviewed and analyzed include:
  - Investor files maintained by EquiAlt personnel;
  - Investor website;
  - Monthly distribution lists maintained by EquiAlt personnel;
  - Files produced by IRA account trustees (e.g., Provident Trust Group, Vantage Retirement Plans, GoldStar Trust Company, IRA Services Trust, etc.); and
  - Accounting records and bank records.
- Prepared analysis of credit card activity for credit cards in the name of B. Rybicki.
- Performed tracing of real estate purchases made by B. Rybicki and related entities.
- Gathered supporting documentation regarding payments to select investors.

# V. <u>PDR CPAs.</u>

The Receiver requests the Court award PDR fees for professional

services rendered and costs incurred from January 1, 2021 through March 31,

2021, in the amount of \$11,639.42. PDR is an accounting firm that specializes

in tax matters and has extensive experience with the tax treatment of

settlement funds. PDR is assisting the Receiver with internal Receivership accounting, financial reporting, and tax preparation and filing. The Court approved hourly billing rates for PDR's professionals (Doc. 85). Later, at the request of the Court, the Receiver provided an estimate of anticipated monthly fees for PDR's services – \$15,000 for each of the first three months and \$6,000 per month thereafter. As shown by the statements attached as composite <u>Exhibit 13</u>, the fees sought for each month during this period are below the limitation. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

Professional	Position	Hours	Rate	Total
William E. Price (WEP)	Partner	11.00	\$320.00	\$3,520.00
CJ Zygaldo (CJZ)	Tax Mgr	0.50	\$230.00	\$115.00
Gail Heinold (GAH)	Senior	5.25	\$155.00	\$813.75
Sharon O'Brien (SAO)	Staff	46.82	\$125.00	\$5,852.50
Fees				\$10,301.25
Disbursements				\$1,338.17
Total		63.57		\$11,639.42

PDR's Time and Fees for Services Rendered

#### VI. <u>E-Hounds, Inc.</u>

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$7,825.00.<sup>11</sup> E-Hounds is a computer forensics firm

<sup>&</sup>lt;sup>11</sup> In March 2021, E-Hounds increased its rates for maintaining the review platform by \$100 per user seat due to increased costs. E-Hounds also increased rates for intake,

that assists the Receiver in securing and analyzing electronic data. E-Hounds has been instrumental in collecting and preserving all electronic records, including email records, GoDaddy records, and DropBox files as well as computer equipment. E-Hounds continues to update and maintain its proprietary review platform, which the Receiver's team is actively using. This quarter, E-Hounds also assisted the Receiver with collecting and preserving data from the Linode investor portal website. Additionally, E-Hounds aided the Receiver with collecting and indexing data from two EquiAlt domain email addresses maintained before the appointment of the Receiver. Copies of the statements summarizing the services rendered for the pertinent period are attached as composite <u>Exhibit 14</u>. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

Professional	Position	Hours	Rate	Total
Adam Sharp (ADS)	Owner	8.60	\$300.00	\$2,580.00
Robert Rohr (RTR)	Intake/collection	2.00	\$250.00	\$500.00
	Intake/collection/			
Robert Rohr (RTR)	preservation	1.00	\$225.00	\$225.00
Robert Rohr (RTR)	Technician	3.80	\$195.00	\$741.00
Dave Bukas (DAB)	Project Mgmt	1.20	\$195.00	\$234.00
Fees				\$4,280.00
Monthly Platform				
Charges				\$3,545.00
Disbursements				\$0.00

E-Hounds' Time and Fees for Services Rendered

collection, and preservation from \$225 to \$250, which is still approximately 50% lower than industry standards according to E-Hounds.

Total 16.60 \$7,825.00
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Receivers in other cases in the Middle District have been awarded fees for computer forensic services at the same rates charged by E-Hounds. *See, e.g., SEC v. Kinetic Investment Group*, Case No. 20-cv-394-T-35SPF (motion at Doc. 73 and order approving at Doc. 101); *CFTC v. Oasis International Group Limited*, Case No. 19-cv-886-T-33SPF (motion at Doc. 203 and order approving at Doc. 207).

#### VII. <u>Freeborn & Peters LLP.</u>

The Receiver requests the Court award Freeborn fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$3,277.50. The Court specifically appointed attorney Robert Stines of Freeborn & Peters LLP to aid the Receiver with technologyrelated issues that would necessarily arise with the Receivership. Mr. Stines has been practicing law for over ten years and is a certified IAPP U.S.-law privacy professional. His practice is focused on cyber law, electronic discovery, digital evidence, privacy and data security. He provides counsel and assistance to the Receiver related to EquiAlt's websites, investor portals, internet and email accounts, and encrypted data on servers and laptops. Mr. Stines works with E-Hounds to segregate and review potentially privileged data prior to allowing access to the Receiver's attorneys. Copies of the statements summarizing the services rendered for the pertinent period are attached as composite <u>Exhibit 15</u>. A summary of the professional's hours rendered during the time covered by this Application is set forth below.

Professional	Position	Yrs Exp.	Hours	Rate	Total
Robert Stines	Partner	10	9.50	\$345.00	\$3,277.50
Total			9.50		\$3,277.50

Freeborn's Time and Fees for Services Rendered

#### VIII. <u>Baskin PLC.</u>

The Receiver requests the Court award Baskin fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$22.50. EquiAlt's main office is located in Tampa, but individual Defendant Barry Rybicki ran part of the EquiAlt operations in Phoenix from both his home and an executive office space. Recognizing this, the Court approved the retention of Arizona counsel and investigators as the Receiver deemed necessary. The Receiver hired Baskin as local counsel to aid him with issues in Arizona related to Defendant Rybicki and other employees and sales agents located in Arizona, including the initial takedown of those offices.

Mr. Baskin has been practicing law for 30 years and is a former Senior Counsel at the Securities Division of the Arizona Corporation Commission and also worked for the Arizona Attorney' General's Office prosecuting securities and white-collar cases. A copy of the statement summarizing the services rendered and costs incurred for the pertinent period is attached as <u>Exhibit 16</u>. A summary of the professional's hours rendered during the time covered by this Application is set forth below.

		Yrs			
Professional	Position	Exp	Hours	Rate	Total
Mladen Milovic					
(MZM)	Associate	1	0.10	\$225.00	\$22.50
Total			0.10		\$22.50

**Baskin's Time and Fees for Services Rendered** 

#### **MEMORANDUM OF LAW**

It is well settled that this Court has the power to appoint a receiver and to award the receiver and those appointed by him fees and costs for their services. See, e.g., S.E.C. v. Elliott, 953 F.2d 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties); Donovan v. Robbins, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) ("[T]he receiver diligently and successfully discharged the responsibilities placed upon him by the Court and is entitled to reasonable compensation for his efforts."); S.E.C. v. Custable, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); S.E.C. v. Mobley, 1317RCC, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 2000) (court awarded reasonable fees for the receiver and his professionals); see also Doc. 11 ¶ 16.

The determination of fees to be awarded is largely within the discretion of the trial court. *See Monaghan v. Hill*, 140 F.2d 31, 34 (9th Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and his Professionals, the Court should consider the circumstances surrounding the Receivership. *See Elliot*, 953 F.2d at 1577.

In determining the reasonableness of fees, the Court must calculate the lodestar, which is the "number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate." Hensley v. Eckerhart, 461 U.S. 424, 433 (1983). This is in part based on the nature and extent of the services rendered and the value of those services. See Grant v. George Schumann Tire & Battery Co., 908 F.2d 874, 877-78 (11th Cir. 1990) (bankruptcy fee award case addressing the issue of attorney's fees generally before considering specific requirements in the bankruptcy context). Additionally, the Court should consider the twelve factors set forth in Johnson v. Georgia Highway Express, Inc., 488 F.2d 714 (5th Cir. 1974), a case involving an award of attorneys' fees under federal civil rights statutes, as incorporated by the Eleventh Circuit in *Grant*, a bankruptcy case, are as follows: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill required to perform the legal services properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee for similar work in the community; (6) whether the fee is fixed

or contingent; (7) time limitations imposed by the client or by the circumstances; (8) the amount involved and results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. Based on the information provided herein as well as the Receiver's Fifth Quarterly Status Report, the Receiver believes that the Court when considering these factors and the work accomplished during this quarter of the Receivership will determine that the Receiver's motion for fees is reasonable and should be granted.

A receiver and the team he or she assembles is entitled to reasonable compensation and courts have looked at several factors in determining reasonableness: (1) the results achieved by the receiver; (2) the ability, reputation and other professional qualities of the receiver; (3) the size of the estate and its ability to afford the expenses and fees; and (4) the time required to conclude the receivership. *SEC v. W.L. Moody* & Co, 374 F. Supp. 465, 480-484 (S.D. Tex. 1974). In this case, the Receiver has continued his duties, investigating, locating, preserving and/or liquidating assets for the benefit of defrauded investors while also continuing to operate the Receivership Entities. This case involves over 1100 investors and over \$170 million in investments. The Receiver is responsible for the active management of over 300 properties, the assessment of pending construction and maintenance projects, as well as supervising employees and property managers.

Finally, the Receiver has sought to keep the EquiAlt investors up to date regarding the Court's progress through the Receivership website, allowing investors to register for information related to this matter. The Receiver and designated paralegals at GK and JCND also field telephone calls from investors and sales agents regarding the allegations in this case and the underlying investments.

Here, because of the nature of this case, it is necessary for the Receiver to employ attorneys and accountants experienced and familiar with financial frauds, federal receiverships, securities, banking, and finance. Further, to perform the services required and achieve the results obtained to date, the skills and experience of the Receiver and the Professionals in the areas of fraud, securities, computer and accounting forensics, and financial transactions are indispensable.

As discussed above, the Receiver, GK, and JCND have discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the attorneys and paralegals are at or below those charged by attorneys and paralegals of comparable skill from other law firms in the Middle District of Florida and have been found reasonable by this Court in granting the Receiver's previous Applications for Fees. This case has been time-intensive for the Receiver and his Professionals because of the need to resolve many issues rapidly and efficiently. The attached Exhibits detail the time, nature, and extent of the professional services rendered by the Receiver and his Professionals for the benefit of investors, creditors, and other interested parties. The Receiver anticipates that additional funds will be obtained through the Receiver's negotiations or litigation with third parties.

Although the SEC investigated and filed the initial pleadings in this case, as directed by the Order Appointing Receiver (see, e.g., Doc. 11 ¶¶ 2, 4), the Receiver is now involved with the investigation and forensic analysis of the events leading to the commencement of the pending action, the efforts to locate and gather investors' money, the determination of investor and other creditor claims and any ultimate payment of these claims. While the Receiver is sensitive to the need to conserve the Receivership Entities' assets, he believes the fees and costs expended to date were reasonable, necessary, and benefited the Receivership. Notably, the Commission has no objection to the relief sought in this motion. S.E.C. v. Byers, 590 F. Supp. 2d 637 (S.D.N.Y. 2008) (quoting S.E.C. v. Fifth Ave. Coach Lines, Inc., 364 F.Supp. 1220, 1222 (S.D.N.Y.1973) ("[I]n a securities receivership, '[o]pposition or acquiescence by the SEC to the fee application will be given great weight.").

## **CONCLUSION**

Under the Order Appointing Receiver, the Receiver, among other things, is authorized and empowered to engage professionals to assist him in carrying out his duties and obligations. The Order Appointing Receiver further provides that he apply to the Court for authority to pay himself and his Professionals for services rendered and costs incurred. In exercising his duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interests of the Receivership.

WHEREFORE, Burton W. Wiand, the Court-appointed Receiver, respectfully requests that this Court award the following sums and direct that payment be made from the Receivership assets:

Burton W. Wiand, Receiver	\$37,836.00
Guerra King P.A.	\$114,963.52
Johnson, Cassidy, Newlon & DeCort	\$19,564.11
Yip Associates	$$170,\!256.50$
PDR CPAs	\$11,639.42
E-Hounds, Inc.	7,825.00
Baskin Richards PLC	\$22.50
Freeborn & Peters LLP	3,277.50

## LOCAL RULE 3.01(g) CERTIFICATION

Undersigned counsel for the Receiver has conferred with counsel and the SEC does not oppose the relief requested in this motion and counsel for Messrs. Davison and Rybicki do not take a position as to the relief sought.

### **<u>RECEIVER'S CERTIFICATION</u>**

The Receiver has reviewed this Fifth Quarterly Fee Application for Order Awarding Fees, Costs, and Reimbursement of Costs to Receiver and His Professionals (the "**Application**").

To the best of the Receiver's knowledge, information, and belief formed after reasonable inquiry, the Application and all fees and expenses herein are true and accurate and comply with the Billing Instructions provided to the Receiver by the Securities and Exchange Commission.

All fees contained in the Application are based on the rates listed in the fee schedule, attached as Exhibit 5. Such fees are reasonable, necessary, and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

The Receiver has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth in the Billing Instructions for photocopies and facsimile transmission).

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested

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reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Application were incurred in the best interests of the Receivership Estate. With the exception of the Billing Instructions and the Court-approved engagements described above, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

> <u>s/Burton W. Wiand</u> Burton W. Wiand, as Receiver

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 2, 2021, I electronically filed a

true and correct copy of the foregoing with the Clerk of the Court through the

CM/ECF system, which served counsel of record.

<u>/s/ Katherine C. Donlon</u>

Katherine C. Donlon, FBN 0066941 kdonlon@jclaw.com JOHNSON, CASSIDY, NEWLON & DECORT P.A. 2802 N. Howard Avenue Tampa, FL 33607 Tel: (813) 291-3300 Fax: (813) 324-4629

and

Jared J. Perez, FBN 0085192 jperez@guerraking.com R. Max McKinley, FBN 119556 <u>mmckinley@guerraking.com</u> GUERRA KING P.A. 5505 West Gray Street Tampa, FL 33609 Tel: (813) 347-5100 Fax: (813) 347-5198

Attorneys for Receiver Burton W. Wiand

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# **EXHIBIT 1**

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Oldsmar / Tampa / St. Petersburg

727-785-4447 813-498-1294 727-784-5491 **Fax** 

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### **REPORT OF STANDARDIZED FUND ACCOUNTING REPORT**

EquiAlt, LLC Receivership Tampa, FL

We have compiled the standardized fund accounting report for the period of January 1, 2021 to March 31, 2021, included in the accompanying prescribed form (Civil Court Docket No 8:20-cv-325-T-35AEP). We have not audited or reviewed the accompanying standardized fund accounting report and accordingly, do not express an opinion or any assurance about whether the standardized fund accounting report is in accordance with the form prescribed by the Civil Court Docket No. 8:20-cv-325-T-35AEP)

Consolidated EquiAlt LLC Receivership is responsible for the preparation and fair presentation of the standardized fund account report in accordance with requirements prescribed by the Civil Court Docket No 8:20-cv-325-T-35AEP and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the standardized fund accounting report.

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist consolidated EquiAlt LLC Receivership in presenting financial information in the form of a standardized fund accounting report without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the standardized fund accounting report.

This standardized fund accounting report is presented in accordance with the requirements of the Civil Court Docket No. 8:20-cv-325-T-35AEP, which differ from accounting principles generally accepted in the United States of America. This report is intended solely for the information and use of the Civil Court Docket No 8:20-cv-325-T-35AEP and is not intended and should not be used by anyone other than this specified party.

PDR CPA'S + Advisors

Oldsmar, Florida April 25, 2021

	Burton W. Wiand as Receiver for			
	Receivership; Civil Court Do Reporting Period 01	ocket No. 8:20-cv-325-T-3 /01/2021 to 03/31/2021	35AEP	
FUND A	CCOUNTING (See Instructions):	Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 01/01/2021):			\$ 7,322,293.0
	Increases in Fund Balance:			
Line 2	Business Income	1,756,412.75		
Line 3	Cash and Securities*	0.00		
Line 4	Interest/Dividend Income	2,183.90		
Line 5	Business Asset Liquidation	0.00		
Line 6	Personal Asset Liquidation	441,869.34		
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other Total Funds Available (Line 1 - 8):	26,156.81	2,226,622.80	9,548,915.8
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
ine 10	Disbursements for Receivership Operations			
	Disbursements to Receiver or Other Professionals	251,666.08		
	Business Asset Expenses	1,134,928.72		
	Personal Asset Expenses	, . ,		
	Investment Expenses			
	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		1,386,594.80	1,386,594.8
	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 Development 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) Reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursements for Distribution Expenses Paid	by the Fund		
	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees			
line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other:			
in - 12	Total Funds Disbursed (Lines 9 - 11) Ending Balance (As of 03/31/2021)			1,386,594.8 8,162,321.0
	LE DUDUG ISSISTICO LAS OF US/SI//U/L)			× 162 321 (

# Case 8:20-cv-00325-MSS-AEP Document 320-1 Filed 06/01/21 Page 4 of 4 PageID 7223

Standardized Fund Accounting Report for Burton W. Wiand as Receiver for EquiAlt, LLC et al. - Cash Basis Receivership; Civil Court Docket No. 8:20-cv-00394-WFJ-SPF Benorting Period 01/01/2021 to 03/31/2021

FUND ACCOUNTING (See Instructions):	iod 01/01/2021 to 03/31/202 Detail	Subtotal	Grand Total
Line 14 Ending Balance of Fund - Net Assets:			
Line 14a Cash & Cash Equivalents			8,162,321.08
Line 14b Investments			
Line 14c Other Assets or Uncleared Funds			· · ·
Total Ending Balance of Fund - Net Assets			8,162,321.08
OTHER SUPPLEMENTAL INFORMATION:	Detail	Subtotal	Grand Total
Report of Items Not To Be Paid by the Fund			
Line 15 Disbursements for Plan Administration Expens	ses Not Paid by the Fund:		
Line 15a Plan Development Expenses Not Paid by the Fur			
1. Fees:			
Fund Administrator			
IDC			
Distribution Agent			
Consultants			
Legal Advisors			
Tax Advisors			
2. Administrative Expenses			
3. Miscellaneous			
Total Plan Development Expenses Not Paid by the	e Fund		
Line 15b Plan Implementation Expenses Not Paid by the Fu			1
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) Reporting Expenses			
Total Plan Implementation Expenses Not Paid by	the Fund		
Line 15c Tax Admistrator Fees & Bonds Not Paid by the F			1
Total Disbursements for Plan Administration E		nd	
Line 16 Disbursements to Court/Other Not Paid by the	-		· · · · · ·
Line 16a Investment Expenses/CRIS Fees			
Line 16b Federal Tax Payments			
Total Disbursements to Court/Other Not Paid b	ov the Fund		
Line 17 DC & State Tax Payments			
Line 18 No of Claims			
# of Claims Received This Reporting Period			
# of Claims Received Fins Reporting Ferror			
Line 19 No of Claimants/Investors:			
Line 19 # of Claimants/Investors Paid This Reporting Pe	riod		
# of Claimants/Investors Paid Since Inception of			
$\pi$ of Clannants/ investors r are since inception of	1 unu		

Receiver:

By: \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_ Case 8:20-cv-00325-MSS-AEP Document 320-2 Filed 06/01/21 Page 1 of 12 PageID 7224

# **EXHIBIT 2**

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# Guerra King P.A.

5505 West Gray Street Tampa, FL 33609 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand Attention: Burton W. Wiand Wiand Guerra King, P.A. 5505 W. Gray Street Tampa, FL 33609

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RE: SEC Receiver - SEC v. Brian Davison, et al.

For Professional Services Rendered Through March 31, 2021

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
1/4/2021	BWW	Communicate with J. Rosenblatt regarding sale of New York City condominium (.1); review documentation regarding same (.2); attend to documents for Gaberone Blvd. property closing (.3).	0.6	\$216.00
1/5/2021	BWW	Confer with K. Donlon regarding motion to expand Receivership to include other properties (.3).	0.3	\$108.00
1/7/2021	BWW	Communicate with N. Dosa regarding sale of Pagani (.2); exchange emails with K. Donlon and J. Rosenblath regarding sale of New York City condominium (.3); work on completing closing documents for Gaberone Blvd. property (.4); review and execute closing documents for Gaberone Blvd. property (.3).	1.2	\$432.00
1/8/2021	BWW	Exchange emails with J. Rosenblatt (.2); review J. Rosenblatt's submission (.3); communicate with K. Donlon regarding watch inventory (.2).	0.7	\$252.00
1/11/2021	BWW	Communicate with K. Donlon regarding outstanding matters, including sales efforts for New York City condominium, Bentley lien, and Cypress warehouse (.5); telephone call with N. Doso regarding Pagani and watches (.2); communicate with J. Rosenblath regarding proposal on New York City condominium (1.0).	1.7	\$612.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
1/13/2021	BWW	Telephone conference with T. Kelly regarding property listings (.5); review prior emails (.7); communicate with J. Rizzo and K. Donlon regarding Bentley title (.2).	1.4	\$504.00
1/26/2021	BWW	Communicate with K. Donlon regarding Oldest House and St. Petersburg property (.2).	0.2	\$72.00
1/27/2021	BWW	Confer with T. Kelly regarding real estate issues (1.0).	1.0	\$360.00
1/29/2021	BWW	Review documents and review and revise motion regarding sale of 2111 W. St. Louis property (1.0); send revised motion to K. Donlon (.1).	1.1	\$396.00
2/3/2021	BWW	Attend meeting with T. Kelly, members of a Tampa historical society, and M. McKinley regarding the potential sale of the Oldest House (1.0), attend follow-up meeting with T. Kelly and M. McKinley regarding the same (1.0).	2.0	\$720.00
2/4/2021	BWW	Attend Zoom meeting with S. McDonald, D. Newman, and T. Kelly regarding St. Petersburg property (1.0); telephone call with C. Parker, attorney with Najmy Thompson, regarding the preparation of a note and mortgage (.3).	1.3	\$468.00
2/7/2021	BWW	Attend scheduling conference regarding Oldest House matter (.2); communicate with D. Newman regarding meeting on St. Petersburg property (.2).	0.4	\$144.00
2/16/2021	BWW	Work on closing regarding sale of 2111 W. St. Louis property (.2).	0.2	\$72.00
2/23/2021	BWW	Work on closing and lien issues regarding sale of 2111 W. St. Louis property (.5).	0.5	\$180.00
2/24/2021	BWW	Work on title issues relating to properties titled in dissolved entity (.7); telephone conference with T. Kelly regarding same (.3); work on potential sale of Pagani (.5).	1.5	\$540.00
2/25/2021	BWW	Work with A. Ellis to complete closing addendum for 2111 W. St. Louis property (.4); execute notarized documents for closing on 2111 W. St. Louis property (1.5).	1.9	\$684.00
3/1/2021	BWW	Attend meeting with T. Kelly and S. Wiand regarding auction of real estate (2.0).	2.0	\$720.00
3/3/2021	BWW	Exchange correspondence with closing agent and J. Rizzo regarding status of closing on 2111 W. St. Louis property (.1); complete closing documents for 2111 W. St. Louis property (1.5).	1.6	\$576.00
3/4/2021	BWW	Work on closing matters (1.0); send information on valuations to SEC (.2).	1.2	\$432.00
3/6/2021	BWW	Review offer for N. Ridge Ave. property (.3).	0.3	\$108.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
3/8/2021	BWW	Attend to offers for N. Ridge Ave. property (.4); review and sign purchase and sale agreement regarding same (.3); communicate with K. Donlon regarding check from lender for Bentley (.1).	0.8	\$288.00
3/9/2021	BWW	Work on sale of N. Ridge Ave. property (.2); review and sign revised purchase and sale agreement regarding same (.1); attend to closing on 2111 W. St. Louis property (.2); review and execute new closing documents regarding same (.1).	0.6	\$216.00
3/11/2021	BWW	Confer with real estate brokers from Orlando regarding property sales (.2); execute additional documents for closing on 2111 W. St. Louis property (.4).	0.6	\$216.00
3/15/2021	BWW	Communicate with M. McKinley regarding valuations of Ferraris (.1); communicate with J. Rizzo regarding updates to website for properties for sale (.1).	0.2	\$72.00
3/16/2021	BWW	Communicate with J. Rizzo regarding status of Maki Road property closing (.1).	0.1	\$36.00
3/17/2021	BWW	Work on closing of N. Ridge Ave. property (.5).	0.5	\$180.00
3/19/2021	BWW	Review and sign listing agreement for twenty-seven properties on MLS (.5); work with T. Kelly regarding negotiations of sale of N. Ridge Ave. property (1.0).	1.5	\$540.00
3/22/2021	BWW	Work on sale of N. Ridge Ave. property with T. Kelly and J. Rizzo (.5); work with J. Rizzo on providing proposals for the valuations to SEC (.5); participate in conference call with T. Kelly and legal team regarding resolving title problems (.3); review status of same (.4).	1.7	\$612.00
3/23/2021	BWW	Telephone call with P. Zlotnick regarding Putnam lease and Pagani sale (.5); review Pagani documents and sale activities (.6).	1.1	\$396.00
3/25/2021	BWW	Review affidavit for B. Davison for resolution of EquiAlt Fund I problem (.3).	0.3	\$108.00
3/26/2021	BWW	Confer with T. Kelly regarding sale negotiations for Bahama Circle property (.3); review correspondence from J. Rizzo regarding status of sale of N. Ridge Ave. property (.1); work on matters regarding Maki Road property (.8).	1.2	\$432.00
3/29/2021	BWW	Negotiate Bahama Circle property transaction (.4).	0.4	\$144.00
3/31/2021	BWW	Telephone call with Capstone regarding purchases of multi-family properties (.2); review notes from conversation with T. Kelly regarding the motion for the sale of the N. Ridge Ave. property (.1); telephone call with M. McKinley regarding same (.5); work on purchase and sale agreement for Bahama Circle property (1.5).	2.3	\$828.00

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
		Total: Asset Disposition	32.40	\$11,664.00
ASSET	Asset	Analysis and Recovery		
1/2/2021	BWW	Review change in SEC statute of limitations (.3); exchange emails with A. Johnson regarding same (.2).	0.5	\$180.00
1/5/2021	BWW	Confer with K. Donlon and G. Burns regarding California lawsuit and choice of mediator (.3).	0.3	\$108.00
1/7/2021	BWW	Communicate with G. Burns and K. Donlon regarding mediation of claims against law firm defendants (.2); review email from K. Donlon regarding Receiver appointment order and Isaiah decision (.5).	0.7	\$252.00
1/19/2021	BWW	Telephone call with R. Bedke regarding status of Receivership (.3); conference call with K. Donlon and G. Burns regarding the joint interest privilege agreement with class action counsel (.7).	1.0	\$360.00
1/20/2021	BWW	Review and revise declaration for motion in California action (.5); review motion regarding dismissal of California action (.8); review response to motion to compel arbitration (.5).	1.8	\$648.00
1/21/2021	BWW	Conference call with G. Burns and K. Donlon regarding motions filed in DLA Piper and Fox Rothschild matters (.5).	0.5	\$180.00
1/24/2021	BWW	Communicate with G. Burns, K. Donlon, and class action counsel regarding outstanding issues (.4).	0.4	\$144.00
1/27/2021	BWW	Conference call with A. Johnson and K. Donlon regarding B. Davison disgorgement (.5).	0.5	\$180.00
1/28/2021	BWW	Review emails and communicate with A. Johnson and K. Donlon regarding B. Davison settlement (1.0).	1.0	\$360.00
2/4/2021	BWW	Telephone conference with M. Yip regarding determination of insolvency of EquiAlt entities (.2).	0.2	\$72.00
2/5/2021	BWW	Participate in conference call with K. Donlon and A. Johnson regarding B. Davison assets and settlement (1.0); confer with K. Donlon regarding same and California action (.7); review and analyze asset spreadsheet (.2); exchange emails with G. Burns and J. Coleman regarding the status of California action and related cases (.5); review and revise motions prepared by Fox Rothschild (.3); exchange emails with the SEC (.2); exchange emails with G. Burns and K. Donlon (.2); conduct research regarding intervention (.3).	3.4	\$1,224.00
2/7/2021	BWW	Confer with K. Donlon regarding various issues (.5).	0.5	\$180.00
2/7/2021	BWW	Confer with G. Burns regarding fee structure and privilege issues (.5).	0.5	\$180.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
2/8/2021	BWW	Conduct research regarding intervention into SEC action (.5); prepare email to legal team regarding same (.2); conference call with G. Burns, A. Johnson, J. Perez, J. Coleman and K. Donlon regarding law firm defendants' motion to compel (.5); conference call with M. Yip, K. Donlon and D. Zamorano regarding losses suffered by funds (.6).	1.8	\$648.00
2/9/2021	BWW	Communicate with K. Donlon and A. Johnson regarding continued settlement discussions with B. Davison (.3).	0.3	\$108.00
2/10/2021	BWW	Conference call with K. Donlon, A. Johnson, H. Fischer and K. Kolbig regarding settlement discussions (.5); telephone call with California investor regarding matters relating to California sales person (.5).	1.0	\$360.00
2/11/2021	BWW	Participate in conference call with K. Donlon and others regarding settlement negotiations (1.1); communicate with A. Johnson and K. Donlon regarding same (.3).	1.4	\$504.00
2/15/2021	BWW	Communicate with M. McKinley, D. Zamorano, and K. Donlon regarding B. Rybicki asset tracing project (.2).	0.2	\$72.00
2/16/2021	BWW	Review updated drafts of response to motion to compel Receiver to dismiss action in California (.9); participate in conference call with J. Coleman, G. Burns, and K. Donlon (.3); review matters relating to BR Support Services (.8).	2.0	\$720.00
2/21/2021	BWW	Review SEC response to law firm defendants' motion to compel transfer of Receiver's case to Florida (.4).	0.4	\$144.00
2/23/2021	BWW	Communicate with K. Donlon regarding outstanding matters (.3); confer with M. Yip regarding various issues (.3).	0.6	\$216.00
2/24/2021	BWW	Review California district court order regarding transfer and dismissal (.3); exchange emails with G. Burns, J. Coleman, and K. Donlon regarding same (.1).	0.4	\$144.00
2/25/2021	BWW	Review proposed notice for filing with court (.4); review order of district court (.3); telephone conference with K. Donlon regarding same (.1).	0.8	\$288.00
2/26/2021	BWW	Prepare for and attend conference call with A. Johnson, C. Rowe, and K. Donlon regarding outstanding issues (.6).	0.6	\$216.00
2/27/2021	BWW	Communicate with K. Donlon regarding additional capital calls (.1).	0.1	\$36.00
2/28/2021	BWW	Attend to B. Davison carve out on Merrill account (.4).	0.4	\$144.00
3/1/2021	BWW	Review opposition to law firms' motion for leave to file reply (.3); communicate with J. Coleman and K. Donlon regarding same (.3).	0.6	\$216.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/2/2021	BWW	Communicate with K. Donlon regarding deposition of T. Kelly (.3).	0.3	\$108.00
3/3/2021	BWW	Telephone call with K. Donlon regarding outstanding matters (.2).	0.2	\$72.00
3/4/2021	BWW	Review issues relating to Davison's Bank of America safe deposit box (.3).	0.3	\$108.00
3/5/2021	BWW	Communicate with J. Rizzo regarding disgorgement efforts against B. Davison (.1).	0.1	\$36.00
3/8/2021	BWW	Exchange emails with G. Burns and K. Donlon regarding privilege issues (.2).	0.2	\$72.00
3/9/2021	BWW	Review matters with counsel relating to California action against attorneys (.2); review pleading filed in California action (.4).	0.6	\$216.00
3/10/2021	BWW	Review motion to retain Johnson Cassidy firm (.3); review communications regarding production of emails to defendants (.4); attention to email production to B. Rybicki and B. Davison (.5).	1.2	\$432.00
3/11/2021	BWW	Work on final judgment agreement for B. Davison (.5).	0.5	\$180.00
3/17/2021	BWW	Review proposed settlement judgment with B. Davison (.5); prepare email to K. Donlon regarding same (.1).	0.6	\$216.00
3/18/2021	BWW	Communicate with A. Johnson, K. Donlon, G. Burns, J. Rizzo, and J. Skicewicz regarding valuation of real estate (.4); review previous proposals regarding same (.6).	1.0	\$360.00
3/19/2021	BWW	Telephone call with K. Donlon and H. Fischer regarding Rock Brothers, coins and domains (.5); telephone conference with C. Masters regarding coins (.3); work on coin valuations (.1); communicate with K. Donlon regarding settlement issues (.1).	1.0	\$360.00
3/24/2021	BWW	Participate in conference call with A. Johnson and K. Donlon regarding review of proposed order (.3); review proposals for document production and associated costs (.4); communicate with K. Donlon regarding same (.1); review potential judgment for B. Davidson (.4).	1.2	\$432.00
3/26/2021	BWW	Communicate with J. Rizzo regarding Volcan 4x4 analysis and recovery (.1).	0.1	\$36.00
		Total: Asset Analysis and Recovery	29.20	\$10,512.00
BUSIN	Busin	ess Operations		
1/6/2021	BWW	Communicate with J. Rizzo regarding payment of management fees (.1); review and approve fund transfers (.1).	0.2	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busin	ess Operations		
1/7/2021	BWW	Review correspondence from E. Redfield regarding letter of credit and related New Jersey Department of Environmental Protection matters (.3).	0.3	\$108.00
1/8/2021	BWW	Conference call with T. Kelly regarding operations matters and various maintenance issues (.6); review cash flow and outstanding tasks (.4); review registration renewals (.1); exchange emails with T. Kelly (.1); communicate with J. Rizzo regarding Receivership properties (.1).	1.3	\$468.00
1/11/2021	BWW	Communicate with J. Rizzo regarding DuPont Registry invoice (.1).	0.1	\$36.00
1/13/2021	BWW	Review maintenance and rehabilitation items (.2); review and approve invoices in AppFolio (.5); telephone call with T. Kelly regarding same (.7).	1.4	\$504.00
1/14/2021	BWW	Attend to matters relating to AppFolio and QOZ accounts (.5); communicate with M. McKinley and J. Rizzo regarding insurance for various cars and boat (.2).	0.7	\$252.00
1/15/2021	BWW	Attend to payment of auction consultant invoice (.3); review matters relating to auto insurance for Pagani and Ferrari (.3); review accounting matters relating to W-9 forms (.2); exchange emails with D. Stoddard and B. Price (.1).	0.9	\$324.00
1/19/2021	BWW	Review and authorize invoices in AppFolio (.5).	0.5	\$180.00
1/20/2021	BWW	Review and authorize invoices through AppFolio (.5); telephone conference with T. Kelly regarding various operational issues (.3).	0.8	\$288.00
1/21/2021	BWW	Conference call with R. Kimko (1.0).	1.0	\$360.00
1/22/2021	BWW	Communicate with J. Rizzo and T. Kelly regarding vehicle insurance (.2).	0.2	\$72.00
1/26/2021	BWW	Review weekly cash report (.3).	0.3	\$108.00
1/27/2021	BWW	Telephone call with R. Kemka regarding Commerce Brewing and Made Coffee event (.3); attend to matters regarding Oldest House (.3).	0.6	\$216.00
2/2/2021	BWW	Exchange emails with K. Donlon, L. Webb, and T. Kelly regarding insurance on New York City condominium (.2).	0.2	\$72.00
2/3/2021	BWW	Review operational issues (.5); review and approve invoices in AppFolio (.5).	1.0	\$360.00
2/4/2021	BWW	Meet with T. Kelly regarding operational issues (.4); review AppFolio and approve various projects and maintenance (.5).	0.9	\$324.00
2/5/2021	BWW	Review and revise T. Kelly mortgage (.8); exchange emails with S. Kelly and T. Kelly regarding same (.2).	1.0	\$360.00
2/7/2021	BWW	Confer with T. Kelly on operational matters (1.2).	1.2	\$432.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
2/9/2021	BWW	Communicate with J. Rizzo regarding credit card paydown approval (.1).	0.1	\$36.00
2/10/2021	BWW	Communicate with J. Rizzo regarding payment of management fees (.1).	0.1	\$36.00
2/11/2021	BWW	Attend meeting with T. Kelly, directors of Commerce Brewing, and M. McKinley (1.0).	1.0	\$360.00
2/12/2021	BWW	Communicate with J. Rizzo regarding payment of management fees and fund transfer (.1).	0.1	\$36.00
2/15/2021	BWW	Conduct research regarding battery issues related to Pagani (.2); telephone conference with E. Sigler (.3); communicate with M. McKinley regarding quitclaim deeds (.2).	0.7	\$252.00
2/16/2021	BWW	Communicate with M. McKinley regarding landscape crew and cleaning crew (.1).	0.1	\$36.00
2/18/2021	BWW	Attend meeting with T. Kelly on organizational issues and other matters (1.7); review and authorize invoices (.5).	2.2	\$792.00
2/23/2021	BWW	Telephone conference with B. Price regarding 1099 issues (.2).	0.2	\$72.00
2/24/2021	BWW	Receive and review financial information regarding Commerce Brewing (.4); review and sign insurance document regarding New York City condominium (.3); exchange correspondence with T. Kelly and M. McKinley regarding RASi invoices (.2).	0.9	\$324.00
2/25/2021	BWW	Reestablish EasyPay (.3).	0.3	\$108.00
2/26/2021	BWW	Communicate with V. Grim and M. McKinley regarding settling affairs of a former tenant (.6).	0.6	\$216.00
3/2/2021	BWW	Prepare correspondence to J. Rizzo regarding management fees (.1); review and approve fund transfers (.1).	0.2	\$72.00
3/4/2021	BWW	Review issues relating to safe deposit box (.3); review and sign application for New Jersey Department of Environmental Protection (.4); review and approve credit card funding transfer (.3); exchange emails with T. Kelly (.2).	1.2	\$432.00
3/5/2021	BWW	Review credit card balance and approve payment (.1).	0.1	\$36.00
3/8/2021	BWW	Attend to 1099 issues (.5); communicate with D. Stoddard and J. Rizzo regarding same (.1).	0.6	\$216.00
3/9/2021	BWW	Communicate with R. Kemka regarding meeting for Rock Brothers and Commerce Brewing (.5); review matters regarding payments on T. Kelly promissory note (.2).	0.7	\$252.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/10/2021	BWW	Attend to necessary filings with New Jersey Department of Environmental Protection regarding Bolero Snort Brewery (.7); review, revise and execute forms regarding same (.3); telephone calls with T. Kelly regarding same (.4); communicate with E. Redfield regarding same (.1); review and approve mid-month management fees and transfer of funds (.2).	1.7	\$612.00
3/11/2021	BWW	Work on matters for environmental project in New Jersey (.2).	0.2	\$72.00
3/15/2021	BWW	Communicate with J. Rizzo and T. Kelly regarding annual reports (.1).	0.1	\$36.00
3/18/2021	BWW	Review Petro Science invoices and forward to T. Kelly for payment (.3); attend to transfers of funds (.2).	0.5	\$180.00
3/19/2021	BWW	Communicate with R. Kemka regarding Rock Brothers (.2); work on payables in AppFolio (.8).	1.0	\$360.00
3/22/2021	BWW	Work on unpaid homeowners association fees for Winter Garden townhouse (.5); communicate with J. Rizzo regarding credit card transactions, Appfolio system, and lease renewals (.2).	0.7	\$252.00
3/24/2021	BWW	Review drafts of letters and settlement agreement regarding Winter Garden townhome (.5); receive and review financial information for Commerce Brewing (.4); review cash activity report (.4).	1.3	\$468.00
3/25/2021	BWW	Review and sign federal and state tax returns (.6); attend to funds transfers (.3); prepare email to J. Lankammer regarding Jasmine Way (.2).	1.1	\$396.00
3/29/2021	BWW	Work with T. Kelly regarding City of Tampa's complaints about Cypress property (.5); review and approve transfer of funds for payroll (.3); communicate with J. Rizzo regarding 2020 tax forms (.1).	0.9	\$324.00
3/30/2021	BWW	Review and approve fund transfer request (.1).	0.1	\$36.00
3/31/2021	BWW	Telephone call with T. Kelly regarding operational matters (.8); communicate with M. McKinley regarding Town Homes of Winter Garden homeowners association fees issue (.2); telephone call with J. Landkammer regarding construction on Jasmine Way (.2).	1.2	\$432.00
		Total: Business Operations	30.50	\$10,980.00
CASE	Case A	Administration		
1/19/2021	BWW	Telephone call with B.S. regarding status of Receivership and circumstances around his and family's investments (.9); prepare email to A. Johnson and R. Bedke regarding same (.2).	1.1	\$396.00

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	Administration		
2/4/2021	BWW	Confer with K. Donlon regarding various operational and legal issues for status report (.5).	0.5	\$180.00
2/9/2021	BWW	Exchange correspondence with A. Stephens regarding investor inquiry (.1).	0.1	\$36.00
		Total: Case Administration	1.70	\$612.00
CLAIM	Claims	s Administration and Objections		
3/9/2021	BWW	Attend to matters regarding IRA questions for investors (.3).	0.3	\$108.00
3/18/2021	BWW	Exchange emails with H.H. (.5).	0.5	\$180.00
3/31/2021	BWW	Exchange correspondence with K. Donlon regarding clams motion (.2).	0.2	\$72.00
		Total: Claims Administration and Obj	1.00	\$360.00
		Total Professional Service	94.8	\$34,128.00
		Total Services	\$34,128.	00
		Total Current Charges		\$34,128.00
		Previous Balance		\$100,123.20
		Less Payments		(\$61,740.00)
		PAY THIS AMOUNT		\$72,511.20

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### TASK RECAP

#### Services

## Disbursements

Project No.	Hours	Amount	Project No.	Amount
ASDIS - ASDIS	32.40	\$11,664.00		\$0.00
ASSET - ASSET	29.20	\$10,512.00		\$0.00
BUSIN - BUSIN	30.50	\$10,980.00		\$0.00
CASE - CASE	1.70	\$612.00		\$0.00
CLAIM - CLAIM	1.00	\$360.00		\$0.00
	94.80	\$34,128.00		\$0.00

## **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASDIS - ASDIS	32.40	\$11,664.00
BWW	Burton W. Wiand	ASSET - ASSET	29.20	\$10,512.00
BWW	Burton W. Wiand	BUSIN - BUSIN	30.50	\$10,980.00
BWW	Burton W. Wiand	CASE - CASE	1.70	\$612.00
BWW	Burton W. Wiand	CLAIM - CLAIM	1.00	\$360.00
			94.80	\$34,128.00

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# **EXHIBIT 3**

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# Guerra King P.A.

5505 West Gray Street Tampa, FL 33609 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand Attention: Burton W. Wiand Wiand Guerra King, P.A. 5505 W. Gray Street Tampa, FL 33609

May 25, 2021 Client: 025305 Matter: 002248 Invoice #: 19507 Page: 1

RE: Brian Davison Receiver - Recovery from Investors

For Professional Services Rendered Through March 31, 2021

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/7/2021	BWW	Communicate with investor G.W. regarding trust documents (.2); communicate with A. Johnson regarding clawbacks and impact of new statute on disclosure (.2); communicate with K. Donlon (.2).	0.6	\$216.00
1/8/2021	BWW	Communicate with K. Donlon regarding investor clawback claims (.5).	0.5	\$180.00
1/12/2021	BWW	Review motion for 10-day letters and authorization of clawback suits (.8); exchange emails with K. Donlon regarding same (.2).	1.0	\$360.00
1/13/2021	BWW	Telephone conference with K. Donlon regarding clawback motion and presuit letter (.3).	0.3	\$108.00
1/14/2021	BWW	Communicate with K. Donlon (.2).	0.2	\$72.00
1/19/2021	BWW	Communicate with K. Donlon regarding clawback motion (.2).	0.2	\$72.00
1/20/2021	BWW	Review motion to authorize clawback actions (.4); communicate with K. Donlon regarding same (.4).	0.8	\$288.00
1/22/2021	BWW	Communicate with K. Donlon regarding presuit letter to clawback defendants (.5).	0.5	\$180.00
1/26/2021	BWW	Communicate with K. Donlon regarding clawback claims (.3).	0.3	\$108.00

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Date ASSET	TKPR	Description of Services Analysis and Recovery	Hours	Amount
ASSET	ASSEL			
1/27/2021	BWW	Communicate with K. Donlon regarding clawback claims (.2).	0.2	\$72.00
2/2/2021	BWW	Communicate with K. Donlon regarding clawback investors who had losses as well (.1).	0.1	\$36.00
2/8/2021	BWW	Communicate with K. Donlon regarding investor L.R. (.1).	0.1	\$36.00
2/11/2021	BWW	Confer with K. Donlon regarding clawback actions (.5).	0.5	\$180.00
2/13/2021	BWW	Work on preparation of clawback lawsuit (1.0).	1.0	\$360.00
2/16/2021	BWW	Review clawback filing and judge assignment (.2); communicate with K. Donlon regarding same (.2).	0.4	\$144.00
3/12/2021	BWW	Review status of litigation (.3); telephone calls with K. Donlon regarding same (.5).	0.8	\$288.00
3/24/2021	BWW	Review email communications from investors (.2).	0.2	\$72.00
		Total: Asset Analysis and Recovery	7.70	\$2,772.00
		Total Professional Service	7.7	\$2,772.00
		Total Services	\$2,772.00	
		Total Current Charges		\$2,772.00
		PAY THIS AMOUNT		\$2,772.00

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### TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	7.70	\$2,772.00		\$0.00
	7.70	\$2,772.00		\$0.00

## **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount	
BWW	Burton W. Wiand	ASSET - ASSET	7.70	\$2,772.00	
			7.70	\$2,772.00	

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# **EXHIBIT 4**

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# Guerra King P.A.

5505 West Gray Street Tampa, FL 33609 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand Attention: Burton W. Wiand Wiand Guerra King, P.A. 5505 W. Gray Street Tampa, FL 33609

May 25, 2021 Client: 025305 Matter: 002249 Invoice #: 19508 Page: 1

RE: Brian Davison Receiver - Family Tree Estate Planning, LLC,

For Professional Services Rendered Through March 31, 2021

Date	TKPR Description of Services		Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/28/2021	BWW	Work on motion to authorize clawback actions against insiders and sales persons (1.5).	1.5	\$540.00
2/13/2021	BWW	Work on preparation of clawback lawsuit (1.0).	1.0	\$360.00
2/16/2021	BWW	Review clawback filing and judge assignment (.1).	0.1	\$36.00
Total: Asset Analysis and Recovery		2.60	\$936.00	
		Total Professional Service	2.6	\$936.00
		Total Services	\$936.0	0
		Total Current Charges		\$936.00
PAY THIS AMOUNT			\$936.00	

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### TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	2.60	\$936.00		\$0.00
	2.60	\$936.00		\$0.00

## **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount	
BWW	Burton W. Wiand	ASSET - ASSET	2.60	\$936.00	
			2.60	\$936.00	

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# EXHIBIT 5

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WGK

WIAND GFERRA KING

5505 W. GRAY STREET I TAMPA. FL 33609 I PHONE: 813.347.5100

FIRM MEMBERS	STANDARD RATES	PROPOSED RATE
Burton Wiand (Sr. Member)	\$500	\$360
Members	\$315-\$475	\$350
Associates	\$235-\$290	\$240
Paralegals	\$165-\$170	\$135

We carry malpractice (\$5 million) as well as fidelity and general liability coverage.

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# **EXHIBIT 6**

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# Guerra King P.A.

5505 West Gray Street Tampa, FL 33609 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand Attention: Burton W. Wiand Wiand Guerra King, P.A. 5505 W. Gray Street Tampa, FL 33609

 May 24, 2021

 Client:
 025305

 Matter:
 002068

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 19510

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RE: SEC Legal Team - SEC v. Brian Davison, et al.

For Professional Services Rendered Through March 31, 2021

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/4/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5); communicate with PDR regarding sale of Rolls Royce and receipt of wire (.2).	0.7	\$94.50
1/5/2021	KCD	Confer with Receiver regarding motion to expand Receivership to include other properties (.3).	0.3	\$105.00
1/5/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/6/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5); review inquiry from potential purchaser (.1); review correspondence from K. Donlon and A. Stephens regarding inquiry from potential purchaser (.1).	0.7	\$94.50
1/7/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset I	Disposition		
1/8/2021	KCD	Communicate with K. Williams with Bank of America regarding release of lien on Bentley (.2); communicate with Fields Auto regarding refund of road hazard coverage on Bentley (.2); continue review of watch inventory and communicate with Receiver regarding same (1.1).	1.5	\$525.00
1/8/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/11/2021	KCD	Communicate with Receiver regarding Bentley lien, New York condominium, and Cypress warehouse (.5); communicate with K. Williams, D. Alfaro and S. Berkeland at Bank of America regarding release of lien (.3).	0.8	\$280.00
1/11/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5); communicate with Receiver regarding marketing efforts and listings for additional properties (.2).	0.7	\$94.50
1/12/2021	KCD	Communicate with K. Williams regarding status of Bentley title (.2).	0.2	\$70.00
1/12/2021	RMM	Communicate and confer with K. Donlon regarding title issues at various properties and motion to expand the Receivership to include those properties (.5); review documents related to expanding the scope of the Receivership to include various properties with title issues (.4); research related to expanding the scope of the Receivership to include various properties with title issues (1.6).	2.5	\$600.00
1/12/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/13/2021	RMM	Research regarding whether the same person can perform multiple valuations for the sale of a particular property (.3); communicate with A. Ellis regarding the same (.2); research related to expanding the scope of the Receivership to include various properties with title issues (.6).	1.1	\$264.00
1/13/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5); communicate with Receiver and K. Donlon regarding processing Bentley car title (.2).	0.7	\$94.50
1/14/2021	KCD	Communicate with K. Williams regarding receipt of Bentley title (.1).	0.1	\$35.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
1/14/2021	RMM	Communicate with T. Kelly, J. Rizzo, K. Donlon, and Receiver regarding insurance for the various cars and a boat (.2); research options for selling the boat (.2); draft motion to expand the scope of the Receivership to include various properties with title issues (.9).	1.3	\$312.00
1/15/2021	RMM	Continue drafting motion to expand the scope of the Receivership to include various properties with title issues (5.3).	5.3	\$1,272.00
1/15/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.7).	0.7	\$94.50
1/18/2021	RMM	Review information regarding the sale of the 2111 W. St. Louis property and correspondence from A. Ellis regarding the same (.5).	0.5	\$120.00
1/19/2021	RMM	Draft motion to approve the sale of the 2111 W. St. Louis property (1.5); communicate with A. Ellis regarding the same (.5).	2.0	\$480.00
1/19/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/20/2021	RMM	Communicate with A. Ellis regarding gathering essential documents for the motion to approve the sale of the 2111 W. St. Louis property (.5).	0.5	\$120.00
1/20/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/21/2021	KCD	Revise motion to expand Receivership to include properties owned by EquiAlt Fund I LLC (.5); communicate with L. Najmy and S. Kelly regarding motion to expand (.1).	0.6	\$210.00
1/21/2021	RMM	Review correspondence regarding the status of sales of various properties (.3); review purchase and sale agreement and appraisals for the 2111 W. St. Louis property (.8); communicate with K. Donlon, J. Rizzo, A. Ellis, T. Kelly, and Receiver regarding the same (.2); finalize motion to approve sale of the 2111 W. St. Louis property (2.0); communicate with K. Donlon, J. Rizzo, P. Taylor, and Receiver regarding the same (.2).	3.5	\$840.00
1/21/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/22/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
1/24/2021	KCD	Follow up with Fields Auto regarding supplemental policies on Bentley (.1).	0.1	\$35.00
1/25/2021	RMM	Review messages from an interested buyer (.3); communicate with J. Rizzo and T. Kelly regarding the same (.2).	0.5	\$120.00
1/25/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.4).	0.4	\$54.00
1/26/2021	KCD	Follow up with L. Najmy and S. Kelly regarding motion to expand Receivership to include properties (.1); communicate with J. Schmidt and P. Hauerstain regarding Tampa Bay's Oldest House (.4); communicate with D. Newman regarding disposition of St. Petersburg property (.2); communicate with Receiver regarding Oldest House and St. Pete property (.2).	0.9	\$315.00
1/26/2021	RMM	Research related to the motion to expand the Receivership to include several parcels of real property (1.0); revise motion to expand the Receivership to include several parcels of real property (.5); communicate with K. Donlon regarding the same (.2).	1.7	\$408.00
1/26/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.2).	0.2	\$27.00
1/27/2021	RMM	Finalize motion to approve the sale of 2111 W. St. Louis property (2.0); confer with J. Perez regarding motions to approve the sale of various properties and the overall plan to eventually sell all of EquiAlt's properties (.2).	2.2	\$528.00
1/27/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.2).	0.2	\$27.00
1/28/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.3).	0.3	\$40.50
1/29/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.2).	0.2	\$27.00
1/30/2021	KCD	Revise motion to approve sale of 2111 W. St. Louis property (.3); communicate with counsel regarding 3.01(g) conference (.1).	0.4	\$140.00
2/1/2021	KCD	Confer with counsel regarding motion to approve sale of 2111 W. St. Louis property (.2); confer with M. McKinley regarding same (.2).	0.4	\$140.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
2/1/2021	RMM	Review the Receiver's revisions to the motion to approve the sale of the 2111 W. St. Louis property (.4); revise the motion to approve the sale of the 2111 W. St. Louis property (1.0).	1.4	\$336.00
2/1/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.3).	0.3	\$40.50
2/2/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.2).	0.2	\$27.00
2/3/2021	RMM	Prepare for and attend meeting with T. Kelly, several members of a Tampa historical society, and Receiver regarding the potential sale of the TB Oldest House (1.5), attend follow-up meeting with T. Kelly and Receiver regarding the same (1.0).	2.5	\$600.00
2/3/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.2).	0.2	\$27.00
2/3/2021	MG	Communicate with the Tampa Times regarding the sale of 2111 W. St. Louis property (.4).	0.4	\$54.00
2/4/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of listed properties and properties under contract (.2); review order granting sale of 2111 W. St. Louis property (.1); communicate with Receiver, listing agent and closing agent regarding order granting sale of 2111 W. St. Louis property (.1).	0.4	\$54.00
2/5/2021	AS	Update master spreadsheet with potential purchaser information (.2).	0.2	\$27.00
2/8/2021	RMM	Communicate with M. Gura regarding potentially interested purchasers for EquiAlt properties and the notice of sale for the 2111 W. St. Louis property (.5).	0.5	\$120.00
2/9/2021	JR	Review correspondence between Receiver and T. Kelly regarding note and mortgage related to property (.1).	0.1	\$13.50
2/10/2021	RMM	Communicate with potential purchaser for the property on Jasmine Way (.4); confer with T. Kelly regarding the same (.2); communicate with T. Kelly and M. Gura regarding potential purchaser for distressed EquiAlt properties for the purpose of renovation and resale (.3).	0.9	\$216.00
2/10/2021	JR	Communicate with Receiver, listing agent, closing agent, T. Kelly and legal team regarding status of closing 2111 W. St. Louis property (.2).	0.2	\$27.00
2/10/2021	MG	Communicate with M. McKinley and T. Kelly regarding properties available for sale (.3).	0.3	\$40.50

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
2/11/2021	JR	Review call from real estate agent regarding client's interest in purchasing Cypress property (.1); communicate with Receiver and legal team regarding call from real estate agent regarding Cypress property (.1).	0.2	\$27.00
2/12/2021	RMM	Communicate with M. Gura and T. Kelly regarding a potential purchaser's request to view numerous properties (.2); review correspondence from J. Rizzo, A. Ellis, and P. Taylor regarding outstanding judgments recorded against the 2111 W. St. Louis property and various other issues related to closing on the sale of that property (.4); draft notice of lack of bona fide offers for 2111 W. St. Louis property (.3).	0.9	\$216.00
2/12/2021	JR	Review correspondence between closing agent, T. Kelly and buyer regarding status of closing 2111 W. St. Louis property (.2).	0.2	\$27.00
2/15/2021	RMM	Review correspondence related to the sale of the 2111 W. St. Louis property and various issues regarding code enforcement problems that are impeding the sale (.2).	0.2	\$48.00
2/15/2021	JR	Review correspondence between closing agent and T. Kelly regarding clearing liens and code violations related to 2111 W. St. Louis property (.2).	0.2	\$27.00
2/16/2021	RMM	Review correspondence from P. Taylor and T. Kelly regarding closing issues for the sale of the 2111 W. St. Louis property (.2); communicate with J. Rizzo and K. Donlon regarding the same (.2); finalize notice of lack of bona fide offers for the 2111 W. St. Louis property (.5); communicate with K. Donlon and Receiver regarding the same (.1); review correspondence from K. Donlon regarding the status of the motion to expand the Receivership to include Maki Road and several other similarly situated properties (.2).	1.2	\$288.00
2/16/2021	JR	Communicate with Receiver, T. Kelly, listing agent and legal team regarding status of filing motion related to titling issues on Maki Road and other properties (.1); review correspondence from purchaser regarding status of closing 2111 W. St. Louis property (.1); communicate with Receiver and T. Kelly regarding status of execution of note and mortgage (.1).	0.3	\$40.50
2/17/2021	RMM	Finalize and file the notice of lack of bona fide offers for the sale of the 2111 W. St. Louis property (.6).	0.6	\$144.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
2/18/2021	RMM	Confer with potential purchaser, D. Minor, regarding a Receivership property and about a homeless person trespassing in the same property (.3); communicate with T. Kelly regarding the same (.3); review property details for 2569 Queensboro Ave. S. (.2); confer with potential purchaser, D. DeLore, regarding interest in purchasing several Receivership properties (.2); confer with potential purchaser, S. Rupp, regarding interest in purchasing several Receivership properties (.2); update Excel sheet with new interested purchaser information (.2).	1.4	\$336.00
2/18/2021	JR	Review correspondence from T. Kelly and closing agent regarding status of closing 2111 W. St. Louis property and clearing liens (.1).	0.1	\$13.50
2/22/2021	JR	Review correspondence from T. Kelly and closing agent regarding status of closing 2111 W. St. Louis property and clearing liens (.2).	0.2	\$27.00
2/24/2021	RMM	Review correspondence from P. Taylor and Receiver regarding unpaid liens filed against 2111 W. St. Louis property (.3); review correspondence from K. Donlon and C. Parker at Najmy Thompson regarding title commitment at Maki Road property and motion to expand the Receivership to include several properties erroneously titled in a defunct LLC (.3); review closing addendum for the sale of 2111 W. St. Louis property and correspondence regarding the same (.2).	0.8	\$192.00
2/25/2021	RMM	Review final closing documents for the sale of the 2111 W. St. Louis property and correspondence from P. Taylor regarding the same (.8).	0.8	\$192.00
3/1/2021	RMM	Review correspondence from K. Donlon regarding a potentially interested purchaser for the Blue Water properties on Treasure Island (.1); communicate with T. Kelly regarding a complete list of EquiAlt properties for marketing and sale purposes (.1).	0.2	\$48.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
3/1/2021	JR	Review correspondence between closing agent and T. Kelly regarding title issues on Maki Road property (.1); review correspondence from A. Ellis regarding closing 2111 W. St. Louis property (.1); review correspondence from Receiver regarding affidavits needed from former principals for closing Maki Road property (.1); review correspondence from T. Kelly regarding execution of affidavits by former principals related to property title issues (.1); review correspondence from closing agent and closing documents related to 2111 W. St. Louis property (.1); communicate with closing agent regarding closing of 2111 W. St. Louis property and related documents (.1); review executed closing documents and related correspondence from Receiver and closing agent regarding 2111 W. St. Louis property (.1); review inquiry from potential purchaser for 8105 W. Gulf Blvd. property (.1).	0.8	\$108.00
3/2/2021	JR	Communicate with closing agent regarding status of closing 2111 W. St. Louis property (.1).	0.1	\$13.50
3/3/2021	JR	Review correspondence from Receiver and closing agent regarding status of closing 2111 W. St. Louis property (.1); review revised closing statement related to same (.1); review correspondence from listing agent and closing agent regarding status of closing 2111 W. St. Louis property (.1).	0.3	\$40.50
3/4/2021	JR	Review correspondence from closing agent regarding status of closing 2111 W. St. Louis property (.1); communicate with closing agent and Receiver regarding closing date for same property per terms of purchase and sale agreement (.1).	0.2	\$27.00
3/5/2021	JR	Review correspondence from T. Kelly regarding clearing title issues related to Maki Road property (.1).	0.1	\$13.50
3/8/2021	RMM	Confer with potentially interested purchaser, S. Gaynor, regarding interest in a Davis Island property (.2).	0.2	\$48.00
3/8/2021	JR	Review correspondence from closing agent regarding status of documentation to clear titling issues on Maki Road property (.1); review correspondence from T. Kelly and Receiver regarding offer to purchase N. Ridge Ave. property and draft purchase and sale agreement (.1); communicate with Receiver and T. Kelly regarding purchase and sale agreement for N. Ridge Ave. property (.2); review correspondence from closing agent regarding status of closing 2111 W. St. Louis property (.1); review and revise purchase and sale agreement related to N. Ridge Ave. property per communications with Receiver and T. Kelly (.4).	0.9	\$121.50
3/9/2021	KCD	Retrieve Bentley excess check from B. Davison (.3).	0.3	\$105.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
3/9/2021	JR	Communicate with Receiver regarding purchase and sale agreement related to N. Ridge Ave. property (.1); communicate with Receiver regarding status of closing of 2111 W. St. Louis property and revised closing statement (.1); review revised closing statement related to 2111 W. St. Louis property and related correspondence from closing agent (.1).	0.3	\$40.50
3/10/2021	JR	Review correspondence from closing agent regarding receipt of buyer's escrow deposit for N. Ridge Ave. property (.1); communicate with Receiver and legal team regarding same (.1).	0.2	\$27.00
3/11/2021	RMM	Review voicemails and communicate with potentially interested purchasers and A. Stephens regarding various EquiAlt properties (1.0).	1.0	\$240.00
3/11/2021	JR	Review correspondence from closing agent and T. Kelly related to survey for N. Ridge Ave. property (.1); communicate with Receiver regarding status of closing of 2111 W. St. Louis property, revised closing statement and addendum to purchase and sale agreement (.1); review correspondence from T. Kelly regarding back-up offer on N. Ridge Ave. property and status of marketing efforts on Bahama Circle property (.1); communicate with closing agent and Receiver regarding revised closing statement, wire instructions for sale proceeds and status of closing for 2111 W. St. Louis property (.1).	0.4	\$54.00
3/12/2021	RMM	Review incoming wire transfer confirmation for the sale of the 2111 W. St. Louis property (.2).	0.2	\$48.00
3/12/2021	JR	Review correspondence from closing agent regarding closing documentation for 2111 W. St. Louis property (.1); communicate with closing agent regarding status of wire of sale proceeds for 2111 W. St. Louis property (.1); receipt and review of ServisFirst Bank wire notification regarding same (.1); communicate with Receiver, legal team and PDR regarding same (.1); update spreadsheet of real property listed and sold (.1).	0.5	\$67.50
3/15/2021	RMM	Review valuations of Ferraris similar to the 1977 308 GTB and communicate with the Receiver regarding the same (.1); communicate with T. Kelly regarding the sale of N. Ridge Ave. property (.1).	0.2	\$48.00
3/15/2021	JR	Review correspondence from T. Kelly regarding renewal of listing agreement for various properties (.1); communicate with Receiver and T. Kelly regarding updates to website with information for properties for sale (.1); review correspondence from M. McKinley regarding preparation of motion to approve sale of N. Ridge Ave. property (.1).	0.3	\$40.50

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ASDIS	Asset	Disposition		
3/16/2021	JR	Review correspondence from T. Kelly regarding status of appraisals and broker price opinions (.1); communicate with Receiver regarding status of sale of N. Ridge Ave. property (.1); review correspondence from T. Kelly to Receiver regarding listing agreement documentation (.1); communicate with Receiver regarding status of Maki Road property closing (.1).	0.4	\$54.00
3/17/2021	JR	Communicate with closing agent and legal team regarding status of fixing title issues to Maki Road property (.1); communicate with Receiver regarding status of Maki Road property (.1); review correspondence from T. Kelly regarding listing agreement for additional properties (.1).	0.3	\$40.50
3/18/2021	JR	Review correspondence from closing agent regarding status of fixing title issues to Maki Road property (.1); review correspondence from T. Kelly to Receiver regarding property listing agreements (.1).	0.2	\$27.00
3/19/2021	JR	Communicate with T. Kelly, Receiver and legal team regarding status of buyer's completion of inspections on N. Ridge Ave. property (.1); review correspondence from Receiver regarding buyer's request for concessions post inspection and back-up offer for N. Ridge Ave. property (.1); review of case materials and retrieval of property valuation proposals per request of Receiver (.4).	0.6	\$81.00
3/22/2021	RMM	Draft proposed order for the motion to expand the scope of the Receivership to include various properties with title issues (1.0); communicate with K. Donlon regarding the same (.1); review correspondence from C. Parker regarding the title issues at several properties (.2).	1.3	\$312.00
3/22/2021	JR	Review correspondence from T. Kelly to Receiver regarding MLS property listings and renewals (.1); communicate with Receiver regarding sending Colliers proposal to A. Johnson (.1); prepare correspondence to A. Johnson with Colliers proposal per request of Receiver (.1); review correspondence from Receiver regarding status of sale of N. Ridge Ave. property (.1); prepare correspondence to Receiver regarding N. Ridge Ave. property (.1); communicate with Receiver regarding status of N. Ridge Ave. property purchase and sale agreement (.1); communicate with Receiver regarding status of Maki Road property transaction (.1); conference call with Receiver, legal team, T. Kelly and closing agent regarding preparation of affidavits and filing motion to clear title issues on Maki Road property (.3).	1.0	\$135.00
3/23/2021	RMM	Revise the motion to expand the scope of the Receivership to include various properties with title issues (2.4); communicate with K. Donlon regarding the same (.1).	2.5	\$600.00

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ASDIS	Asset	Disposition		
3/24/2021	RMM	Revise the motion to expand the scope of the Receivership to include various properties with title issues (.4); communicate with K. Donlon regarding the same (.1).	0.5	\$120.00
3/25/2021	AS	Telephone call with potential purchaser and prepare email to Receiver regarding same (.2).	0.2	\$27.00
3/25/2021	JR	Review correspondence from A. Stephens regarding communications with potential property purchaser (.1).	0.1	\$13.50
3/26/2021	RMM	Review correspondence from T. Kelly regarding the sale of N. Ridge Ave. property (.2); finalize motion to expand Receivership to include several erroneously titled properties (2.5).	2.7	\$648.00
3/26/2021	JR	Review correspondence from closing agent and proposed affidavit for B. Davison regarding Maki Road property #45 title issues (.1); communicate with Receiver and T. Kelly regarding status of sale of N. Ridge Ave. property (.1); review correspondence from T. Kelly regarding status of inspections and appraisal on N. Ridge Ave. property (.1).	0.3	\$40.50
3/29/2021	RMM	Communicate with K. Donlon regarding motion to expand the receivership to include several erroneously titled properties (.2).	0.2	\$48.00
3/30/2021	RMM	Attend meeting with T. Kelly regarding obtaining insurance for the Pagani, the sale of Bahama Circle property, the motion to approve the sale of the N. Ridge Ave. property, and several miscellaneous matters (.5); follow up on issues discussed at meeting (1.4).	1.9	\$456.00
3/31/2021	RMM	Draft motion to approve sale of N. Ridge Ave. property (1.5); communicate with P. Taylor, Receiver, and K. Donlon regarding same (.5); revise motion to approve the sale of real property template to streamline and expedite future filings (1.7); communicate with K. Donlon and M. Gura regarding the motion to approve sale of N. Ridge Ave. property and publication of the mandatory newspaper advertisement for the proposed sale (.6); review counteroffer and purchase and sale agreement for Bahama Circle property (.2).	4.5	\$1,080.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
3/31/2021	JR	Review correspondence from T. Kelly regarding information needed for preparation of sale of N. Ridge Ave. property (.1); review correspondence from T. Kelly regarding counter-offer and purchase and sale agreement regarding Bahama Circle property (.1); review correspondence from M. McKinley regarding sale of N. Ridge Ave. property (.1); review correspondence from closing agent regarding lien search on same (.1); review draft motion to approve sale of N. Ridge Ave. property and related correspondence from M. McKinley (.1); review correspondence from Receiver regarding filing motion to approve sale of N. Ridge Ave. property (.1).	0.6	\$81.00
		Total: Asset Disposition	73.40	\$16,121.50
ASSET	Asset	Analysis and Recovery		
1/4/2021	RMM	Revise motion for summary judgment in Volcan 4x4 case (3.0); draft Receiver's affidavit in support of the same (1.5); communicate with D. Zamorano regarding B. Rybicki asset tracing project (.2).	4.7	\$1,128.00
1/5/2021	KCD	Confer with J. Perez, M. McKinley and K. Phelps regarding motion to consolidate (.3); confer with Receiver and G. Burns regarding California lawsuit and choice of mediator for global mediation (.3).	0.6	\$210.00
1/5/2021	RMM	Finalize motion for summary judgment in the Volcan 4x4 case (1.3); prepare for and attend telephonic meeting with K. Donlon, J. Perez, and K. Phelps regarding motion to consolidate (.5); confer with J. Perez after the meeting (.1); revise motion to pool assets of the Receivership Entities (1.7).	3.6	\$864.00
1/5/2021	JR	Review correspondence from Receiver and K. Donlon regarding preparation of motion to include defunct fund as Receivership Entity (.1).	0.1	\$13.50
1/6/2021	KCD	Review B. Davison watch list and information gathered by Receivership team and internet research (5.2).	5.2	\$1,820.00
1/6/2021	KCD	Compare B. Davison watch list to purchase records (7.8).	7.8	\$2,730.00
1/6/2021	RMM	Finalize motion for summary judgment in the Volcan 4x4 case (1.2); revise motion to pool assets of the Receivership Entities (2.5).	3.7	\$888.00
1/6/2021	JR	Communicate with Yip Associates regarding status of review of Comerica Bank records (.1).	0.1	\$13.50

review of Comerica Bank records (.1).1/8/2021RMMFinalize and file motion for summary judgment in the<br/>Volcan 4x4 case (.5); communicate with M. Hill and K.<br/>Donlon regarding the same (.2).0.7

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/11/2021	KCD	Communicate with A. Scilleri at Sotheby's regarding status update (.2).	0.2	\$70.00
1/11/2021	RMM	Review amended certificate of service for Volcan 4x4 motion for summary judgment, confirm filing and mailing of the same (.5).	0.5	\$120.00
1/12/2021	KCD	Continue review of watch information (.8); send detailed email to A. Johnson and H. Fischer regarding same (.4).	1.2	\$420.00
1/12/2021	RMM	Communicate with D. Zamorano regarding B. Rybicki asset tracing project (.2).	0.2	\$48.00
1/14/2021	KCD	Review common interest agreement proposed by class action counsel and communicate with G. Burns regarding same (.3).	0.3	\$105.00
1/15/2021	KCD	Communicate with D. Zamorano at SEC regarding Fund II investment in Alternative Capital (.3); communicate with A. Friedman and G. Burns regarding California litigation (.2).	0.5	\$175.00
1/19/2021	KCD	Communicate with A. Johnson regarding B. Davison discussions (.4); communicate with Receiver and G. Burns regarding common interest agreement (.7); communicate with A. Friedman, A. Moskowitz and G. Burns regarding common interest agreement (.6); communicate with A. Johnson and D. Zamorano regarding T. Elliott (.2).	1.9	\$665.00
1/19/2021	RMM	Finalize motion to pool Receivership assets (4.0); communicate with J. Perez and K. Donlon regarding the same (.3).	4.3	\$1,032.00
1/20/2021	RMM	Revise motion to pool Receivership assets (.5).	0.5	\$120.00
1/21/2021	KCD	Communicate with G. Burns and Receiver regarding California litigation, pending motions, privilege and common interest agreement (.5).	0.5	\$175.00
1/22/2021	KCD	Communicate with A. Johnson and H. Fischer regarding information related to B. Davison watches (.2); review and revise updated common interest agreement (.2).	0.4	\$140.00
1/24/2021	KCD	Communicate with G. Burns, Receiver and class action counsel regarding outstanding issues (.4).	0.4	\$140.00
1/25/2021	KCD	Call with G. Burns in preparation for call with class action counsel (.1); conference call with G. Burns and class action counsel (.7); review and revise notice of withdrawal of motion regarding subpoena to Receiver (.3).	1.1	\$385.00
1/27/2021	KCD	Conference call with A. Johnson and D. Zamorano regarding D. Tenhulzen and A. Sears (.5); conference call with A. Johnson and Receiver regarding B. Davison disgorgement (.5).	1.0	\$350.00

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ASSET	Asset	Analysis and Recovery		
1/28/2021	KCD	Confer with J. Perez regarding potential claims against sales agents (.2); confer with Receiver and A. Johnson regarding B. Davison settlement discussions (.3); communicate with A. Johnson and D. Zamorano regarding Stevenson related investments (.2).	0.7	\$245.00
1/29/2021	JR	Review correspondence from SEC and download files to system (.3).	0.3	\$40.50
2/3/2021	JR	Review correspondence from EquiAlt investors regarding clawback email and correspondence (.1).	0.1	\$13.50
2/4/2021	KCD	Communicate with Receiver regarding outstanding issues (.5).	0.5	\$175.00
2/5/2021	KCD	Review comments from Receiver regarding settlement discussions (.2); conference call with A. Johnson and Receiver regarding B. Davison settlement discussions (1.0); communicate with Receiver regarding B. Davison settlement discussions and California action (.7); review Fox Rothschild filing regarding California action (.3); review information from H. Fischer for certain watches, research regarding same, and update charts (1.6); update chart regarding B. Davison jewelry (.4).	4.2	\$1,470.00
2/5/2021	RMM	Review correspondence and voicemail from A. Stephens and E. Babbini regarding his involvement with the REIT (.2).	0.2	\$48.00
2/7/2021	KCD	Confer with Receiver regarding outstanding issues (.5).	0.5	\$175.00
2/8/2021	KCD	Conference call with G. Burns, A. Johnson, J. Perez, J. Coleman and Receiver regarding law firm defendants' motion to compel (.5); call with Receiver, M. Yip and D. Zamorano regarding funds (.6).	1.1	\$385.00
2/9/2021	KCD	Conference call with G. Burns, A. Moskowitz and A. Friedman regarding common interest agreement (.5).	0.5	\$175.00
2/9/2021	KCD	Call with A. Fels and A. Soto regarding clawback claim and tolling agreement (.2); communicate with H. Fischer regarding tolling agreement (.1); communicate with A. Johnson and Receiver regarding continued settlement discussions with B. Davison (.3).	0.6	\$210.00
2/9/2021	AS	Prepare sharefile link for third party DLA and Fox Rothschild production and exchange emails with R. Creech and K. Donlon regarding same (1.0).	1.0	\$135.00
2/10/2021	KCD	Conference call with Receiver, A. Johnson, H. Fischer and K. Kolbig regarding settlement discussions (.5); call with C. Babbini (.2).	0.7	\$245.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
2/11/2021	KCD	Conference call with A. Johnson, H. Fischer, K. Kolbig and Receiver regarding settlement negotiations (1.1); communicate with A. Johnson and Receiver regarding same (.3).	1.4	\$490.00
2/12/2021	JJP	Review filings regarding constructive trust and asset pooling (.5).	0.5	\$175.00
2/12/2021	KCD	Communicate with Receiver regarding investor complaint and B. Davison settlement negotiations (.2); communicate with A. Johnson regarding B. Davison settlement negotiations (.2); review correspondence from A. Fels regarding waiver of attorney-client privilege (.1).	0.5	\$175.00
2/12/2021	RMM	Review cases and pleadings from K. Phelps regarding the motion to pool Receivership assets (3.0); communicate with J. Perez regarding the same (.2).	3.2	\$768.00
2/15/2021	RMM	Draft subpoena regarding Rosenbarry Properties (.7); research related to B. Rybicki asset tracing project (1.0); communicate with D. Zamorano, K. Donlon, and Receiver regarding the same (.3).	2.0	\$480.00
2/16/2021	KCD	Conference call with Receiver, G. Burns and J. Coleman regarding response to law firms' motion to compel (.3); call with M. Yip regarding monies owing on debentures (.2).	0.5	\$175.00
2/16/2021	RMM	Schedule hearing date for the motion for summary judgment in the Volcan 4x4 case (.3); draft notice of hearing and letter to Judge regarding motion for summary judgment in the Volcan 4x4 case (.5).	0.8	\$192.00
2/17/2021	KCD	Revise and finalize Receiver's opposition to nonparties' motion to compel (1.0).	1.0	\$350.00
2/17/2021	RMM	Finalize and file motion for summary judgment and amended certificate of service in the Volcan 4x4 case and communicate with M. Hill regarding the same (1.0).	1.0	\$240.00
2/19/2021	KCD	Communicate with E-Hounds regarding common interest documents (.3); finalize response to non-movant law firms' motion to compel (.2); exchange emails with A. Johnson regarding potential B. Davison settlement (.1).	0.6	\$210.00
2/22/2021	KCD	Communicate with W. Schifino regarding leave to file reply (.1).	0.1	\$35.00
2/23/2021	KCD	Communicate with Receiver regarding outstanding items (.3); communicate with A. Friedman regarding outstanding items (.2).	0.5	\$175.00
2/23/2021	RMM	Confer with K. Donlon regarding the upcoming hearing on the motion for summary judgment in the Volcan 4x4 case (.1); review motion to compel the Receiver to bring claims in this district (.9).	1.0	\$240.00

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ASSET	Asset	Analysis and Recovery		
2/24/2021	KCD	Communicate with H. Fischer regarding coins, safe deposit box, Merrill Lynch account and release of Toyota 4Runner (.5); review information regarding B. Davison coins, safe deposit box and Merrill Lynch accounts (2.3); draft letter to Advantage Transport regarding release of Toyota 4Runner (.3).	3.1	\$1,085.00
2/24/2021	RMM	Research ownership status of the Toyota 4Runner and communicate with K. Donlon regarding the same (.3); review notice of filing clawback claims, response in opposition to motion to compel the Receiver to bring claims in this district, SEC response to motion to compel and joint motion for leave to file reply in support of motion to compel (1.0).	1.3	\$312.00
2/25/2021	KCD	Review California order and draft notice of filing (.9); confer with Receiver regarding same (.1); review subpoenas from B. Rybicki to DLA and Fox Rothschild (.2); forward same to class action attorneys (.1); review REIT bank account statements from Bank of America and communicate with J. Bernstein regarding same (.4).	1.7	\$595.00
2/26/2021	KCD	Conference call with A. Johnson, C. Rowe, and Receiver regarding outstanding issues (.6).	0.6	\$210.00
2/27/2021	KCD	Communicate with H. Fischer regarding registered agent for B. Davison Capital (.1); review email from J. Bernstein regarding additional capital calls (.2); communicate with Receiver regarding same (.1).	0.4	\$140.00
3/1/2021	JJP	Identify research, briefs, and filings related to clawback action and potential settlement with B. Davison (1.0).	1.0	\$350.00
3/1/2021	KCD	Conference call with A. Johnson and H. Fischer regarding B. Davison settlement (.5); communicate with J. Coleman and Receiver regarding opposition to law firms' motion for leave to file reply (.3); review domains proposal from H. Fischer (.2); prepare email to Receiver regarding same (.1).	1.1	\$385.00
3/1/2021	RMM	Review Receiver's notice of filing order of U.S. District Court, Central District of California, related to non-parties' motion to compel (.1).	0.1	\$24.00
3/2/2021	KCD	Confer with Receiver regarding deposition of T. Kelly (.3).	0.3	\$105.00
3/3/2021	KCD	Confer with Receiver regarding outstanding items (.2); confer with M. Yip and D. Zamorano regarding investor analyses and outstanding issues (.6).	0.8	\$280.00
3/3/2021	RMM	Communicate with D. Zamorano regarding B. Rybicki asset tracing project (.2).	0.2	\$48.00
3/3/2021	JR	Communicate with Receiver regarding status of T. Kelly mortgage (.1).	0.1	\$13.50

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/4/2021	KCD	Exchange emails with H. Fischer and Receiver regarding safe deposit box (.2).	0.2	\$70.00
3/4/2021	RMM	Prepare for and attend meeting with D. Zamorano regarding B. Rybicki asset tracing project (.5); review records from Maricopa County to identify additional LLCs and entities related to B. Rybicki for financial analysis (2.9); communicate with D. Zamorano regarding same (.5); review deeds and deeds of trust for particular properties associated with B. Rybicki in Arizona (.8); communicate with Receiver and K. Donlon regarding same (.3).	5.0	\$1,200.00
3/4/2021	JR	Communicate with M. McKinley regarding B. Rybicki's corporate entities for purposes of tracing purchases and investments (.1); review correspondence from M. McKinley to Yip Associates regarding B. Rybicki asset tracing (.1); communicate with T. Kelly regarding mortgage and promissory note execution status (.1).	0.3	\$40.50
3/5/2021	RMM	Review documents and financial records related to BR Support Services and B. Rybicki asset tracing project (1.7).	1.7	\$408.00
3/5/2021	JR	Communicate with Receiver regarding disgorgement efforts against B. Davison (.1).	0.1	\$13.50
3/8/2021	KCD	Review domains list proposed by H. Fischer (.2); exchange emails with A. Johnson and H. Fischer regarding settlement terms (safe deposit box, domains and BMW Financial check) (.5); exchange emails with G. Burns, A. Friedman and Receiver regarding privilege issues (.2).	0.9	\$315.00
3/8/2021	RMM	Review report and recommendation (.3); review investor plaintiffs' notice of limited appearance and motion for leave to serve subpoena on Receiver (.5); review non-party R. Mar's notice of dismissal of the Mar action (.2); review B. Davison's first request for production of documents to Receiver and interrogatories (.6); review Receiver's notice of filing clawback cases (.3); review order denying B. Davison's motion to dismiss the amended complaint (.3).	2.2	\$528.00
3/8/2021	JR	Assemble DLA and Fox billing documentation for SEC counsel per request of K. Donlon (.2).	0.2	\$27.00
3/9/2021	RMM	Prepare for hearing on motion for summary judgment in the Volcan 4x4 case and revise proposed order (1.5); confer with K. Donlon regarding same (.2); review correspondence from D. Zamorano regarding B. Rybicki asset tracing project (.1).	1.8	\$432.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/9/2021	JR	Review correspondence from Yip Associates regarding analysis of B. Rybicki accounts and Citi credit card records (.1); review case-materials related to B. Rybicki Citi credit card records (.2); prepare correspondence to Yip Associates regarding B. Rybicki credit card records and records related to other related entities (.1).	0.4	\$54.00
3/10/2021	RMM	Prepare for and attend hearing on motion for summary judgment in the Volcan 4x4 case (3.0); revise proposed order regarding the same (.5); communicate with Receiver and K. Donlon regarding the same (.5); review notes regarding the inventory of B. Davison's safe deposit box and communicate with K. Donlon regarding the gold coins found therein (.7).	4.7	\$1,128.00
3/11/2021	KCD	Telephone call with R. Rohr regarding B. Rybicki document request (.2); communicate with Receiver regarding class action document production and B. Davison settlement (.3); conference call with R. Rohr and R. Stines regarding email production (.2); exchange emails with A. Johnson, H. Fischer and R. Stines regarding document production (.2).	0.9	\$315.00
3/11/2021	RMM	Review correspondence and documents from D. Zamorano regarding the B. Rybicki asset tracing project (.5); review various information related to valuing the 1977 Ferrari (.5); review information regarding B. Davison's coin collection and communicate with K. Donlon regarding the same (.3).	1.3	\$312.00
3/11/2021	JR	Review correspondence from D. Zamorano regarding Citi records related to B. Rybicki and related entities' accounts and analysis of same (.1).	0.1	\$13.50
3/15/2021	RMM	Review comprehensive list of all EquiAlt properties and communicate with M. Gura and K. Donlon regarding the same (.4); review B. Rybicki asset tracing project and communicate with D. Zamorano regarding the same (.2).	0.6	\$144.00
3/15/2021	JR	Review correspondence from A. Stephens regarding communication with investor about status and information related to sales agent (.1).	0.1	\$13.50
3/17/2021	RMM	Review financial accounting records from D. Zamorano regarding B. Rybicki's credit cards for asset tracing project (5.5).	5.5	\$1,320.00
3/18/2021	RMM	Prepare for and attend telephonic meeting with D. Zamorano regarding financial records related to B. Rybicki's credit cards and real properties related to the asset tracing project (1.0); research and review records and financial documents related to the B. Rybicki asset tracing project (1.6).	2.6	\$624.00

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ASSET	Asset	Analysis and Recovery		
3/19/2021	RMM	Review correspondence related to clawback lawsuits (.2); revise order on motion for summary judgment in the Volcan 4x4 lawsuit (.4); communicate with K. Donlon and N. Cook regarding the same (.3); draft proposed order for attorney's fees and costs in the Volcan 4x4 lawsuit (.7); prepare for and attend telephonic meeting with K. Donlon regarding the B. Rybicki asset tracing project (.6); review documents and financial records related to the B. Rybicki asset tracing project (2.0); communicate with J. Rizzo regarding the same (.1).	4.3	\$1,032.00
3/19/2021	JR	Review correspondence between M. McKinley and Yip Associates regarding information related to funds to purchase B. Rybicki properties (.1); review correspondence from M. McKinley regarding Citi credit card records (.1); prepare response to M. McKinley regarding Citi credit card records previously obtained and requesting additional documentation (.1).	0.3	\$40.50
3/22/2021	RMM	Review document requests and communicate with K. Donlon and J. Rizzo regarding strategy for obtaining additional information from Citi Bank regarding additional accounts associated with B. Rybicki (1.3).	1.3	\$312.00
3/22/2021	JR	Review correspondence from M. McKinley regarding obtaining additional records from Citi for additional accounts associated with B. Rybicki (.1).	0.1	\$13.50
3/24/2021	RMM	Review SEC's response to defendant B. Rybicki's first request for production of documents, answers to first set of interrogatories, and desist and refrain order to B. Mohr (.7); draft account release authorization form for recently discovered accounts associated with B. Rybicki (1.0); communicate with K. Donlon and D. Zamorano regarding the same (.2); revise cover letter to Judge Gabbard regarding the motion for summary judgment in the Volcan 4x4 case (.3).	2.2	\$528.00
3/24/2021	JR	Review correspondence from SEC regarding finder's fee agreement and related email (.1); review SEC's responses to B. Rybicki's requests for production and review related document production (.1); review E-Hounds platform for property related documentation (.4).	0.6	\$81.00
3/25/2021	RMM	Revise account release authorization forms for recently discovered accounts associated with B. Rybicki and communicate with K. Donlon regarding the same (2.5); finalize cover letter and proposed order for the motion for summary judgment in the Volcan 4x4 case (.2).	2.7	\$648.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/25/2021	JR	Review correspondence from SEC and supplemental production in response to B. Rybicki's requests for production and related correspondence from J. Perez (.1); communicate with M. McKinley regarding organization of case-related documents and pleadings (.1).	0.2	\$27.00
3/26/2021	RMM	Review documents from the SEC regarding B. Rybicki's finder's fee agreements and the involvement of P. Wassgren in the same (1.2); draft subpoenas for various title companies who participated in B. Rybicki's real estate transactions in Arizona (2.0); communicate with K. Donlon regarding the same (.1).	3.3	\$792.00
3/26/2021	JR	Communicate wth A. Baker regarding Volcan 4x4 case and address of C. Guy (.1); communicate with Receiver regarding Volcan 4x4 analysis and recovery (.1).	0.2	\$27.00
3/29/2021	RMM	Review motion to stay proceedings (.3); review Receiver's unopposed motion for leave to retain Johnson Cassidy Newlon (.1) review correspondence from Registered Agent Solutions and V. Grim regarding the settlement check for the former EquiAlt tenant for whom she is a court-appointed guardian (.4).	0.8	\$192.00
3/31/2021	JR	Review correspondence from outside counsel regarding sales agent documentation (.1).	0.1	\$13.50
		Total: Asset Analysis and Recovery	118.40	\$33,014.00
BUSIN	Busine	ess Operations		
1/4/2021	RMM	Review correspondence from E. Redfield regarding the New Jersey environmental remediation project (.9).	0.9	\$216.00
1/4/2021	JR	Review account balances and related correspondence from EquiAlt staff (.2); communicate with ServisFirst Bank regarding updating account information and email addresses (.1); receipt and review of PetroScience invoice and related correspondence (.1); review invoice from RASi and related correspondence (.1); communicate with T. Kelly regarding status of resolution of City of St. Petersburg property violation (.1); communicate with Receiver and T. Kelly regarding ServisFirst Bank credit card statement (.1).	0.7	\$94.50
1/5/2021	RMM	Update signs at EquiAlt office to include new contact information (.4).	0.4	\$96.00
1/5/2021	JR	Review account balances and related correspondence from EquiAlt staff (.2); communicate with EquiAlt accountant regarding ServiceFirst Bank credit card statement (.1).	0.3	\$40.50

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
1/6/2021	RMM	Meet S. Wiand at the EquiAlt garage and unload office furniture and equipment (.5); confer with S. Wiand regarding interested purchasers for the 1977 Ferrari and various Receivership assets (.5); update security contact information to include S. Wiand as the primary contact for the EquiAlt garage (.2).	1.2	\$288.00
1/6/2021	JR	Review account balances and related correspondence from EquiAlt staff (.2); communicate with EquiAlt accountant and Receiver regarding payment of management fees (.1); review correspondence and related spreadsheet from EquiAlt accountant regarding management fees to be paid (.1); communicate with ServisFirst Bank regarding account (.1); communicate with ServisFirst Bank and Receiver regarding low balances in accounts (.1); communicate with T. Kelly regarding resolution of violation related to St. Petersburg, Florida property (.1); perform fund transfers per approval of Receiver (.3); communicate with PDR regarding low account balances (.1).	1.1	\$148.50
1/7/2021	RMM	Identify suitable office furniture for A. Santana for her to continue working from home during the pandemic (1.5); communicate with A. Santana and S. Wiand regarding the same (.3).	1.8	\$432.00
1/7/2021	JR	Review account balances and related correspondence from EquiAlt staff (.2); communicate with ServisFirst Bank regarding account (.1).	0.3	\$40.50
1/8/2021	RMM	Review irregular alarm system notifications at EquiAlt garage (.2); confer with S. Wiand regarding the same to confirm there is not an active alarm (.1).	0.3	\$72.00
1/8/2021	JR	Communicate with K. Donlon and EquiAlt staff regarding December 2020 bank statements (.2); receipt and review of December 2020 bank statements and organize same (.5); review violation notice from City of Tampa regarding 3014 S. Westshore (.1); review account balances ledger from EquiAlt staff (.1); review Florida Secretary of State notices regarding various Receivership entities' annual reports (.2).	1.1	\$148.50
1/11/2021	JR	Communicate with Receiver and EquiAlt staff regarding payment of DuPont Registry invoice (.2); communicate with PDR regarding accounts (.1); review daily account balances and related correspondence from EquiAlt staff (.1); communicate with PDR regarding ordering checks (.1); communicate with ServisFirst Bank regarding eServis and bill pay (.1); review ServisFirst Bank notice regarding insufficient funds (.1); communicate with Receiver, EquiAlt staff and PDR regarding notice from ServisFirst Bank (.1).	0.8	\$108.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
1/12/2021	JR	Review daily account balances and related correspondence from EquiAlt staff (.1); review ServisFirst Bank credit card balance and transactions (.1); communicate with EquiAlt staff and Receiver regarding credit card balance and transactions (.1).	0.3	\$40.50
1/13/2021	RMM	Locate a replacement laptop due to technical issues with W. Brown's work computer and provide additional office supplies for him to continue working from home during the pandemic (.5); communicate with W. Brown regarding the same (.3); change and replace various air filters and plumbing filters at the EquiAlt office while the building is not staffed by employees who would typically handle such matters (.5); communicate with T. Kelly, K. Donlon, and S. Wiand regarding obtaining office furniture for employees to continue working from home during the pandemic (.2); confer with T. Kelly regarding a dispute with a local municipality and other miscellaneous matters (.3).	1.8	\$432.00
1/13/2021	JR	Communicate with Receiver and PDR regarding payment of auction-related invoices (.2); review daily account balances and related correspondence from EquiAlt staff (.1); communicate with PDR regarding status of ordering checks (.1); review correspondence from EquiAlt staff and fund transfer requests for credit card paydown and management fees (.2).	0.6	\$81.00
1/14/2021	RMM	Review request for reimbursement for essential supplies for EquiAlt employee to continue working from home during the pandemic (.3); communicate with T. Kelly and A. Santana regarding the same (.2).	0.5	\$120.00
1/14/2021	JR	Review daily account balances and related correspondence from EquiAlt staff (.1); perform fund transfers related to management fees and credit card paydown per approval and communication with Receiver (.5); communicate with ServisFirst Bank regarding credit card paydown (.1); communicate with T. Kelly, Receiver and K. Donlon regarding vehicle and boat insurance (.2).	0.9	\$121.50
1/15/2021	JR	Review daily account balances and related correspondence from EquiAlt staff (.1); perform fund transfers per approval and communication with Receiver (.5); communicate with ServisFirst Bank regarding eServis login issues (.1); communicate with T. Kelly, Receiver and K. Donlon regarding vehicle and boat insurance (.2); communicate with ServisFirst Bank regarding bank letter to activate online payments through AppFolio (.1); communicate with EquiAlt staff and PDR regarding 1099s (.2); communicate with Receiver and K. Donlon regarding payment of invoices (.1).	1.3	\$175.50

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
1/19/2021	JR	Prepare spreadsheet and correspondence to ServisFirst Bank requesting wire transfer (.5); review daily account balances and related correspondence from EquiAlt staff (.1); communicate with ServisFirst Bank regarding bank letter to activate online payments through AppFolio (.1); review correspondence between EquiAlt staff and PDR regarding 1099s (.2); communicate with Receiver and K. Donlon regarding payment of invoices (.1).	1.0	\$135.00
1/20/2021	JR	Review daily account balances and related correspondence from EquiAlt staff (.1); communicate with Receiver and T. Kelly regarding payment of RASi invoices (.2).	0.3	\$40.50
1/21/2021	RMM	Meet with T. Kelly regarding code enforcement actions, historical preservation society demands regarding the TB Oldest House property, and several other matters (.5); locate essential office supplies for employees to continue working from home during the pandemic (.2).	0.7	\$168.00
1/22/2021	RMM	Confer with B. Nkya regarding guardian appointed over an elderly tenant of the trailer park (.2); confer with V. Grimm, the guardian attorney, regarding the elderly tenant's personal items and whether he owned or leased the trailer (.4); review notes and send follow-up emails regarding the same (1.4); review correspondence and policy information regarding insurance contact and registration for the Pagani (1.0); communicate with J. Rizzo and K. Donlon regarding the same (.4); prepare for and attend telephonic meeting with T. Kelly regarding the abandoned trailer, insurance for the Pagani, and identifying all known REIT and QOZ related LLC's (1.3).	4.7	\$1,128.00
1/22/2021	JR	Communicate with Receiver, T. Kelly and legal team regarding vehicle insurance (.2); review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from M. McKinley regarding EquiAlt office expenditures (.1).	0.4	\$54.00
1/25/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from M. McKinley regarding interested property purchaser (.1); retrieve bank account statements per request of K. Donlon (.2).	0.4	\$54.00
1/26/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from Florida Secretary of State regarding annual report for Blue Waters (.1); review correspondence and cash activity report (.1).	0.3	\$40.50

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
1/27/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from Florida Secretary of State regarding annual report for corporate entities (.1); review correspondence and spreadsheet from EquiAlt accountant (.1).	0.3	\$40.50
1/28/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); perform fund transfers per review correspondence and spreadsheet from EquiAlt accountant and approval of Receiver (.2); communicate with T. Kelly regarding status of corporate filings (.1); communicate with T. Kelly regarding status of fixing code violations on properties (.1).	0.5	\$67.50
1/29/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); communicate with T. Kelly regarding status of corporate filings (.1); communicate with EquiAlt accountant and PDR regarding payment of auction invoice (.1); receipt and review of January 2021 ServisFirst Bank credit card account statement (.1); communicate with Receiver, EquiAlt staff and legal team regarding January 2021 ServisFirst Bank credit card account statement (.1).	0.5	\$67.50
2/1/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review Florida SunBiz notifications regarding annual report filings for various corporate entities (.2); communicate with Receiver, T. Kelly and K. Donlon regarding Florida SunBiz notifications regarding annual report filings (.1); review correspondence from RASi regarding outstanding invoices (.1); communicate with Receiver, T. Kelly and K. Donlon regarding outstanding RASi invoices (.1); communicate with Receiver and legal team regarding Receiver's credit card expenditure and reimbursement (.1); review 1099-INTs from ServisFirst Bank (.1); communicate with Receiver and PDR regarding 1099-INTs from ServisFirst Bank (.1); receipt and review of January 2021 ServisFirst Bank account statements and transfer same to system (.2).	1.1	\$148.50
2/2/2021	KCD	Exchange emails with L. Webb, Receiver and T. Kelly regarding insurance on New York apartment (.2); exchange emails with T. Kelly and J. Bernstein regarding rent payments still going to Bank of America REIT account (.2).	0.4	\$140.00
2/2/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); communicate with EquiAlt staff regarding credit card charges and balance paydown (.1); review online credit card account balance and transactions per request of EquiAlt staff (.1); communicate with K. Donlon regarding October deposit (.1); review correspondence and documentation related to insurance for New York condominium (.1).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busin	ess Operations		
2/3/2021	RMM	Communicate with T. Kelly regarding meeting with architect at TB Oldest House and coordinating the pickup of keys at the EquiAlt office (.4); review orders appointing V. Grim as guardian over the affairs of a former EquiAlt tenant, the tenant's lease agreement, and communicate with V. Grim and B. Nkya regarding the same (.6).	1.0	\$240.00
2/3/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence and spreadsheet related to payment of management fees (.1).	0.2	\$27.00
2/4/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from Receiver regarding payment of management fees (.1); perform fund transfers for approved management fees (.3); communicate with EquiAlt staff regarding credit card charges (.1); review correspondence from T. Kelly regarding credit card charges (.1); communicate with T. Kelly regarding status of remedy to violations at 3014 S. Westshore Blvd. (.1); review correspondence and spreadsheet regarding credit card paydown (.1).	0.9	\$121.50
2/5/2021	RMM	Review correspondence from victim investors regarding their IRS form 1099s (.1); communicate with T. Kelly regarding missed FedEx deliveries at the EquiAlt office (.2).	0.3	\$72.00
2/5/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); calculate payment of court approved fees per communications with Receiver, K. Donlon and T. Kelly (.5); prepare letter to ServisFirst Bank requesting wire transfers to pay court approved fees (.3).	0.9	\$121.50
2/9/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); check online credit card balance and recent transactions (.1); communicate with T. Kelly regarding available credit card balance (.1); communicate with K. Donlon regarding accounts (.1); retrieve bank account statements from ServisFirst Bank online system per request of K. Donlon (.4); communicate with Receiver regarding approval for credit card paydown (.1); perform fund transfers for credit card paydown per review of spreadsheet and approval of Receiver (.3); prepare correspondence to ServisFirst Bank regarding credit card paydown (.1); communicate with T. Kelly, Receiver and legal team regarding PetroScience invoice (.1).	1.4	\$189.00
2/10/2021	RMM	Communicate with potential rental tenant and T. Kelly regarding available units (.5).	0.5	\$120.00

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BUSIN	Busine	ess Operations		
2/10/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from EquiAlt staff regarding payment of management fees (.1); communicate with Receiver and K. Donlon regarding payment of management fees and account consolidation (.1).	0.3	\$40.50
2/11/2021	RMM	Prepare for and attend meeting with T. Kelly, directors of Commerce Brewing, and Receiver (2.0).	2.0	\$480.00
2/11/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from EquiAlt staff and Receiver regarding payment of management fees (.1); review low account balance alert from ServisFirst Bank (.1); communicate with Receiver and T. Kelly regarding low account balance alert (.1).	0.4	\$54.00
2/12/2021	RMM	Obtain duplicate keys to the EquiAlt office and garage (1.0); update security credentials and communicate with T. Kelly regarding the same (.5); communicate with A. Santana regarding procedures for investor calls to the EquiAlt office (.2); review correspondence regarding previous employee A. Hammond's W-2 (.1).	1.8	\$432.00
2/12/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review correspondence from EquiAlt staff and Receiver regarding payment of management fees (.1); perform fund transfers for management fees per Receiver's approval (.2); communicate with Receiver regarding wire instructions (.1); review ServisFirst Bank credit card balance and transactions per request of T. Kelly (.1); communicate with Receiver regarding credit card balance and declined charges (.1).	0.7	\$94.50
2/15/2021	RMM	Review quitclaim deeds identified at the EquiAlt office and communicate with Receiver regarding the same (.7); review correspondence and attachments from R. Stines regarding the investor portal that was active for EquiAlt prior to the appointment of the Receiver (.2).	0.9	\$216.00
2/15/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review weekly cash activity report and related correspondence from EquiAlt staff (.1); review correspondence between Receiver, R. Stines and E-Hounds regarding recovery of website and investor portal materials (.1).	0.3	\$40.50
2/16/2021	RMM	Review correspondence from T. Kelly regarding Ring Central call forwarding services for EquiAlt employees while working remotely during the pandemic (.1); coordinate the scheduling for the cleaning crew and landscape crew for the EquiAlt office and communicate with Receiver regarding the same (.2).	0.3	\$72.00

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SERVICES	;			
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BUSIN	Busine	ess Operations		
2/16/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review St. Petersburg violation notice related to 525 27th Ave S. property (.1).	0.2	\$27.00
2/17/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); communicate with T. Kelly regarding St. Petersburg violation notice related to 525 27th Ave S. property (.1); review correspondence from EquiAlt staff regarding credit card transactions and balance (.1); review online credit card transactions and balance (.1); review correspondence from EquiAlt staff regarding account balances (.1).	0.5	\$67.50
2/19/2021	RMM	Confer with S. Wiand regarding the security system at the EquiAlt office (.2); unlock the EquiAlt office for the landscape crew and cleaning crew (.2); confer with S. Wiand regarding the Pagani and the security system and air conditioning system at the EquiAlt garage (.2).	0.6	\$144.00
2/22/2021	RMM	Provide office furniture to S. Wiand and B. Nkya and communicate with both regarding the same (.5).	0.5	\$120.00
2/22/2021	JR	Review correspondence from EquiAlt staff regarding account balances (.1); review violation notices related to two properties (.1).	0.2	\$27.00
2/24/2021	RMM	Review correspondence from T. Kelly and Receiver regarding past due bills for registered agent solutions (.2); review correspondence from T. Kelly regarding updating various licensure information with DBPR including elevator permits at multiple properties (.2).	0.4	\$96.00
2/25/2021	RMM	Communicate with T. Kelly, Receiver, and V. Grimm, the court-appointed guardian of one of the trailer park tenants, regarding past due rent and the removal of the trailer at the property (.5); review paperwork regarding the same (.2); communicate with a tenant who came to the EquiAlt office attempting to pay past due rent (.2); communicate with B. Nkya regarding the same (.1).	1.0	\$240.00
2/26/2021	RMM	Communicate with V. Grim, the guardian for a former tenant, and Receiver regarding settling the affairs of the former tenant (.6).	0.6	\$144.00
3/1/2021	RMM	Review correspondence from Registered Agent Solutions regarding past due balance on a Receivership LLC and notice of resignation (.2); review invoices for Registered Agent Solutions, PetroScience, and various bank account statements (.3).	0.5	\$120.00

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Date BUSIN	TKPR Busin	Description of Ser	vices		Hours	Amount
3/1/2021 JR Review correspondence from EquiAlt staff and account balances report (.1); review correspondence from T. Kelly regarding renewal of business licenses for various EquiAlt properties and elevator permits (.1); review correspondence from D. Stoddart and T. Kelly regarding receipt of wire related to Commerce Brewery (.1); review correspondence from D. Stoddart and weekly cash activity report (.1); review lease renewal notifications (.1); review low balance alert from ServisFirst Bank (.1); receipt and review of RASi notice regarding resignation related to B.		1.5	\$202.50			

		system (.2); review correspondence from D. Stoddart regarding request for transfer of management fees for February and review related spreadsheet (.1).		
3/2/2021	RMM	Communicate with T. Kelly regarding missed FedEx delivery at the EquiAlt office (.2).	0.2	\$48.00

Davison Capital, LLC (.1); review correspondence from D. Stoddart regarding request for funds transfer to cover month-end bills and review related spreadsheet (.1); receipt

regarding resolution of rent dispute (.1); receipt and review of compliance event alert from RASi regarding EquiAlt Fund II, LLC (.1); communicate with Receiver, T. Kelly, K. Donlon and M. McKinley regarding compliance event alert from RASi regarding EquiAlt Fund II, LLC (.1); review correspondence from EquiAlt accountant and February 2021 bank account statements and transfer same to

and review of violation notice from City of Lakeland regarding 211 W. Crescent Drive (.1); review correspondence between M. McKinley and tenant

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/2/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review RASi notification regarding upcoming compliance event for EquiAlt QOZ FL Holdings, LLC (.1); review correspondence from T. Kelly regarding permit application for well testing (.1); review weekly cash activity report for the week ending February 27, 2021 and related correspondence from D. Stoddart (.1); review correspondence from Receiver regarding management fees (.1); review online ServisFirst Bank credit card statement and recent transactions (.1); communicate with EquiAlt staff, Receiver and legal team regarding ServisFirst Bank credit card statement and recent transactions (.1); perform fund transfers for February management fees (.2); communicate with Receiver and EquiAlt staff regarding fund transfers for management fees and funding to pay month-end bills (.1); perform fund transfers for February month-end bills (.2); communicate with Receiver and EquiAlt staff regarding fund transfers for funding February month-end bills (.1); review ServisFirst Bank low balance alert (.1); receipt and review of bank account reconciliation reports from EquiAlt staff (.1); receipt and review of lease renewal notification (.1); communicate with EquiAlt staff regarding ServisFirst Bank credit card statement and vehicle auction invoice (.1).	1.7	\$229.50
3/3/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review SilverFlume and Nevada notifications regarding upcoming compliance event for EquiAlt Fund, LLC (.1); communicate with Receiver, T. Kelly, K. Donlon and M. McKinley regarding SilverFlume and Nevada notifications regarding EquiAlt Fund, LLC (.1); communicate with Receiver regarding status of consolidating accounts (.1); communicate with M. Lockwood regarding payment to vendor (.1); review ServisFirst Bank low account balance alert (.1); review correspondence from T. Kelly regarding permit application related to 316 20th St. (.1); review correspondence from T. Kelly regarding corporate status of 521 Commerce Drive LLC (.1).	0.8	\$108.00
3/4/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low balance alert (.1); review correspondence from T. Kelly regarding corporate status of 521 Commerce Drive LLC (.1).	0.3	\$40.50

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BUSIN	Busin	ess Operations		
3/5/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low balance alert (.1); review correspondence from EquiAlt staff regarding credit card paydown and approval from Receiver (.1); review correspondence from T. Kelly regarding corporate status of 521 Commerce Drive LLC (.1); perform transfers for credit card paydown per approval of Receiver (.3); prepare correspondence to ServisFirst Bank requesting paydown of credit card balance per approval of Receiver (.1); review correspondence from ServisFirst Bank confirming credit card paydown (.1).	0.9	\$121.50
3/8/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); communicate with PDR regarding payment of fees (.3); communicate with EquiAlt staff regarding call from investor about incorrect information on 1099 form (.1); receipt and review of lease renewal notification (.1); review ServisFirst Bank low account balance alert (.1); review correspondence from EquiAlt staff regarding payment of March mid-month management fees (.1); communicate with Receiver regarding payment of March mid-month management fees (.1); receipt and review of weekly cash activity report for the week ending March 6, 2021 and related correspondence from EquiAlt staff (.1).	1.0	\$135.00
3/9/2021	RMM	Organize keys to the EquiAlt office and multiple properties and communicate with T. Kelly regarding the same (.5); meet with T. Kelly regarding the keys to the EquiAlt office and garage, and several miscellaneous matters (.5).	1.0	\$240.00
3/9/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low account balance alert (.1); review correspondence from investor and M. McKinley regarding withdrawal requests (.1); review notice from ServisFirst Bank regarding dormant account (.1); communicate with Receiver, K. Donlon, M. McKinley and T. Kelly regarding ServisFirst Bank dormant account notice (.1); review executed promissory note from T. Kelly and related correspondence between T. Kelly and Receiver (.1); receipt and review of violation notice from St. Petersburg regarding 508 38th Ave. (.1).	0.7	\$94.50

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BUSIN	Busine	ess Operations		
3/10/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low account balance alert (.1); communicate with Receiver and D. Stoddart regarding depositing promissory note payments from T. Kelly (.2); review correspondence from Receiver, T. Kelly and PetroScience, Inc. regarding 316 20th St. test wells and EPA documentation (.1); review correspondence and spreadsheet related to mid-month management fee transfer request and approval from Receiver (.1); perform fund transfers for mid-month management fees per approval of Receiver (.3); receipt and review of Florida Division of Corporations notice regarding deadline to file annual report for EA SIP LLC (.1); communicate with Receiver and T. Kelly regarding same (.1).	1.1	\$148.50
3/11/2021	RMM	Review emails from J. Rizzo and D. Stoddart regarding various accounting matters (.3).	0.3	\$72.00
3/11/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low account balance alert (.1); review correspondence from T. Kelly regarding account balances, maintaining balances and potential transfer of funds (.1); review correspondence from Receiver regarding 316 20th St. test wells and signed EPA documentation (.1).	0.4	\$54.00
3/12/2021	RMM	Purchase replacement printer ink cartridges for the EquiAlt office and communicate with T. Kelly regarding the same (.5); address accumulating debris and electric scooters outside of the EquiAlt office (.5).	1.0	\$240.00
3/12/2021	JR	Review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low account balance alert (.1); receipt and review of Florida Division of Corporations notices regarding deadline to file annual report for various corporate entities (.1); communicate with Receiver and T. Kelly regarding same (.1); review lease renewal notification (.1); review eServis account to confirm deposit of 2111 W. St. Louis property sale proceeds (.1); review correspondence from T. Kelly to Receiver regarding filing annual reports for Florida corporations (.1); receipt and review of ServisFirst Bank wire notification regarding receipt of sale proceeds for 2111 W. St. Louis property (.1).	0.8	\$108.00
3/15/2021	RMM	Communicate with T. Kelly regarding reimbursement for office supplies purchased for the EquiAlt office (.1).	0.1	\$24.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/15/2021	JR	Review correspondence from K. Donlon regarding depositing checks (.1); communicate with D. Marrero regarding depositing checks (.1); review correspondence from EquiAlt staff and account balances report (.1); review ServisFirst Bank low account balance notification (.1); receipt and review of Florida Secretary of State annual report filing notifications related to various companies (.1); communicate with T. Kelly and Receiver regarding same (.1); review correspondence from D. Stoddart and weekly cash activity report for the week ending March 13, 2021 (.1); receipt and review of ServisFirst Bank dormant account notification (.1); communicate with Receiver regarding ServisFirst Bank dormant account notification (.1); review correspondence from tenant regarding payment of past due rent (.1).	1.0	\$135.00
3/16/2021	JR	Review correspondence from ServisFirst Bank regarding depositing checks (.1); prepare checks for deposit at ServisFirst Bank (.2); review lease renewal notification (.1); review ServisFirst Bank low balance alert (.1); communicate with PDR regarding deposits (.1); review correspondence related to domains from Receiver, K. Donlon, T. Kelly and E-Hounds (.1); receipt and review of RingCentral network update and related correspondence from R. Jernigan (.1); review correspondence from EquiAlt staff and account balances report (.1).	0.9	\$121.50
3/17/2021	RMM	Communicate with V. Grimm regarding payment of former EquiAlt tenant's past due rent (.3).	0.3	\$72.00
3/17/2021	JR	Review ServisFirst Bank low balance alerts (.1); review correspondence from EquiAlt staff and account balances report (.1); review correspondence from M. McKinley to tenant regarding payment of past due rent (.1); receipt and review of violation notice related to 4233 Darlington Road and notification from RASi regarding service of same (.1); communicate with Receiver, T. Kelly and legal team regarding violation notice regarding 4233 Darlington Road (.1); communicate with Receiver regarding low balance alert from ServisFirst Bank (.1); review correspondence from EquiAlt accountant and spreadsheet of REIT management fee transfer requests (.1).	0.7	\$94.50
3/18/2021	JR	Review ServisFirst Bank low balance alerts (.1); review correspondence from EquiAlt staff and account balances report (.1); review correspondence from EquiAlt staff to Receiver requesting approval of funds transfer request (.1); review correspondence from T. Kelly to Receiver regarding filing annual reports for Florida corporations (.1).	0.4	\$54.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/19/2021	JR	Review PetroScience invoice (.1); communicate with Receiver, T. Kelly and M. McKinley regarding same (.1); review ServisFirst Bank low balance alerts (.1); review correspondence from Receiver approving fund transfer requests (.1); review lease renewal notification (.1); review correspondence from EquiAlt staff regarding account balances (.1); perform fund transfers for REIT management fees per approval of Receiver (.2); communicate with PDR regarding deposit related to Commerce Brewery (.1).	0.9	\$121.50
3/22/2021	RMM	Review invoice from Petro Science regarding the ongoing environmental remediation project in New Jersey (.1); review correspondence regarding past due homeowners association fees and review records related to the same, and communicate with K. Donlon, T. Kelly, and the Receiver regarding the same (1.0); draft correspondence to C. Meadows regarding past due homeowners association fees at a townhome in Winter Garden (.7); research regarding the Town Homes of Winter Garden's claim that they are entitled to recover attorney's fees from the Receivership (1.5).	3.3	\$792.00
3/22/2021	JR	Review lease renewal notification (.1); review ServisFirst Bank low balance alert (.1); review correspondence from EquiAlt staff with daily account balances (.1); review online ServisFirst Bank credit card account transactions and balance (.1); communicate with Receiver and EquiAlt staff regarding ServisFirst Bank credit card account transaction and balance (.1); communicate with Receiver regarding credit card transactions, Appfolio system and lease renewals (.2).	0.7	\$94.50
3/23/2021	RMM	Investigate alarm notification from the garage and communicate with S. Wiand regarding the same (.5); conduct research regarding the Town Homes of Winter Garden's claim that it is entitled to recover attorney's fees from the Receivership (1.5); revise correspondence to C. Meadows regarding past due homeowners association fees at a townhome in Winter Garden and draft settlement agreement regarding the same (1.0).	3.0	\$720.00
3/23/2021	JR	Review correspondence from EquiAlt staff with daily account balances (.1); review online ServisFirst Bank low balance account notification (.1).	0.2	\$27.00

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/24/2021	RMM	Review correspondence and check from V. Grim on behalf of the former tenant who is now under the care of a guardian and facilitate check payment to conclude the matter (1.0); communicate with J. Rizzo and the Receiver regarding the same (.2); finalize correspondence to C. Meadows regarding past due homeowners association fees at a townhome in Winter Garden and draft settlement agreement regarding the same (1.4); prepare letter to T. Kelly with check regarding the same (.2).	2.8	\$672.00
3/24/2021	JR	Review lease renewal notification (.1); review correspondence from EquiAlt staff with daily account balances (.1); review online ServisFirst Bank low balance account notification (.1); review correspondence from tenant regarding payment of past-due rent and related correspondence from M. McKinley (.1); communicate with M. McKinley, Receiver and EquiAlt staff regarding past due rent check and depositing same (.1).	0.5	\$67.50
3/25/2021	RMM	Communicate with T. Kelly and B. Nkya regarding landscape and maintenance at the EquiAlt office (.1); communicate with B. Ferguson regarding mail and check pickup at the EquiAlt office (.1); attend meeting with T. Kelly regarding insurance for the Pagani, the status of various proposals to sell multiple properties, and several miscellaneous matters (1.3).	1.5	\$360.00
3/25/2021	JR	Review correspondence from EquiAlt staff with daily account balances (.1); review correspondence from EquiAlt staff and weekly cash activity report for the week ending March 20, 2021 (.1); review ServisFirst Bank low account balance notification (.1); review 2020 tax return packet from PDR (.1); communicate with PDR regarding 2020 tax return packet (.1); communicate with Receiver regarding review and execution of 2020 tax return (.1).	0.6	\$81.00
3/26/2021	RMM	Review tax notification documents from Registered Agent Solutions regarding various corporate entities (.3).	0.3	\$72.00
3/26/2021	JR	Review ServisFirst Bank low account balance notification (.1); review lease renewal notifications (.1); review correspondence from EquiAlt staff and daily account balances report (.1); review correspondence from T. Kelly regarding deposits (.1); review correspondence and spreadsheet from D. Stoddart with funding request to cover month-end payroll and bills (.1); communicate with Receiver regarding execution of 2020 tax return forms (.1); receipt and review of RASi notices regarding alternative entity tax notices for various entities (.1); communicate with Receiver, T. Kelly and M. McKinley regarding RASi notices (.1).	0.8	\$108.00

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SERVICES	5			
Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/29/2021	RMM	Unlock EquiAlt office for landscape crew (.2); communicate with T. Kelly regarding obtaining insurance for the Pagani, checks, and several miscellaneous matters (.5).	0.7	\$168.00
3/29/2021	JR	Review ServisFirst Bank low account balance notification (.1); review lease renewal notifications (.1); review correspondence from EquiAlt staff and daily account balances report (.1); review correspondence from R. Jernigan regarding semi-monthly payroll report (.1); communicate with R. Jernigan and Receiver regarding payroll report notifications (.1); review correspondence from T. Kelly regarding ADP notifications (.1); communicate with Receiver regarding review and execution of 2020 tax return forms per request of PDR (.1); review correspondence from T. Kelly regarding LLC renewals (.1); review correspondence from D. Stoddart regarding status of approval of funding request to cover month-end payroll and bills (.1); review RASi notices regarding filing annual reports for various companies (.1); communicate with A. Baker, Receiver, T. Kelly and M. McKinley regarding RASi notices (.1); communicate with PDR regarding tax returns (.1).	1.2	\$162.00
3/30/2021	RMM	Confer with T. Kelly regarding employee stipend amount to purchase office supplies and furniture while working from home (.1); draft and send correspondence to C. Meadows regarding the homeowners association fees at the Town Homes of Winter Garden (1.3).	1.4	\$336.00
3/30/2021	JR	Review ServisFirst Bank low account balance notification (.1); review lease renewal notifications (.1); review correspondence from EquiAlt staff and daily account balances report (.1); retrieve and review March 2021 ServisFirst Bank credit card statement and transactions (.1); communicate with Receiver and EquiAlt staff regarding March 2021 ServisFirst Bank credit card statement and recent transactions (.1); review correspondence from T. Kelly regarding execution of New Jersey remediation cost review RFS/FA form (.1); review correspondence from D. Stoddart regarding funds transfer request (.1); review correspondence from Receiver approving funds transfer request (.1); prepare funds transfer per request of Receiver (.1); communicate with Receiver, EquiAlt staff, M. McKinley and PDR regarding completion of funds transfer (.1); review correspondence from A. Stephens regarding inquiry from potential renter (.1).	1.1	\$148.50

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SERVICE	6			
Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busin	ess Operations		
3/31/2021	RMM	Review checks for various properties and provide the same to B. Ferguson (1.0); review correspondence regarding payroll deficiency (.1); communicate with Receiver regarding the letter and check to resolve the homeowners association fees issue at the Town Homes of Winter Garden (.2); communicate with T. Kelly regarding office supplies for the EquiAlt office (.1).	1.4	\$336.00
3/31/2021	JR	Review correspondence from EquiAlt staff and weekly cash activity report for the week ending March 27, 2021 (.1); review ServisFirst Bank low account balance notification (.1); review lease renewal notifications (.1); review correspondence from EquiAlt staff and daily account balances report (.1); review RASi compliance alert regarding EquiAlt Fund II, LLC (.1); communicate with Receiver, T. Kelly and M. McKinley regarding same (.1).	0.6	\$81.00

CASE	Case A	Administration		
1/4/2021	AS	Review SEC v. Sears complaint (.7); prepare email to R. During for website update for related litigation category (.2).	0.9	\$121.50
1/4/2021	MML	Exchange correspondence with S. O'Brien regarding inquiry for accounting report (.1); exchange correspondence with K. Donlon regarding same (.1).	0.2	\$48.00
1/5/2021	AS	Review court filing and communicate with R. During for website updates, including firm name change information (.6); exchange emails with three investors regarding case updates (.6); telephone calls with two investors regarding same (.7); prepare email to Receiver and legal team regarding debt collection email and review responses (.3).	2.2	\$297.00
1/5/2021	JR	Review correspondence from KTek regarding website updates (.1).	0.1	\$13.50
1/6/2021	AS	Review investor emails and forward to legal team for response (.2); review investor beneficiary information and update file and master spreadsheet (.3); update master spreadsheet of potential purchaser information (.2); telephone calls with four investors regarding case updates (1.0).	1.7	\$229.50
1/7/2021	AS	Exchange emails with two investors regarding case updates (.4); communicate with J. Rizzo regarding Sonn Law Firm class action (.2); telephone calls with three investors regarding case updates (.7); review investor emails and registrations (.5).	1.8	\$243.00
1/7/2021	JR	Review correspondence from KTek regarding website updates (.1).	0.1	\$13.50

**Total: Business Operations** 

77.90

\$14,802.50

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case /	Administration		
1/11/2021	AS	Review and respond to K. Donlon regarding investor emails and updates (.2); review investor plaintiff's motion and forward to R. During for website update (.5).	0.7	\$94.50
1/12/2021	AS	Review Court filings and forward to R. During with instructions for website updates (1.3); review of net winner spreadsheet and analyze accuracy with registrations (1.0); communicate with K. Donlon regarding same (.2); review quarterly registrations, calls and emails and prepare email to K. Donlon for fourth status report (1.5).	4.0	\$540.00
1/12/2021	JR	Communicate with KTek regarding website updates (.1).	0.1	\$13.50
1/13/2021	AS	Exchange emails with five investors regarding case updates (.9); review court order and forward to R. During for website updates (.2).	1.1	\$148.50
1/14/2021	AS	Telephone calls with five investors regarding case updates (1.3); exchange email with investor regarding same (.1); communicate with D. Marerro regarding investor registrations (.2); prepare email to Receiver and legal team regarding P.R. (.2); review and respond to email from N. Cook regarding investor call (.1).	1.9	\$256.50
1/15/2021	AS	Exchange emails with three investors regarding case updates (.6); telephone calls with two investors regarding same (.8); review email from R.S. and forward to legal team (.1).	1.5	\$202.50
1/21/2021	AS	Email exchange with investor regarding tax issues (.1); telephone calls with seven investors regarding case updates (2.3); exchange emails with three investors regarding case updates (.5); review Court filing in Receivership and forward to R. During for addition to website (.2).	3.1	\$418.50
1/22/2021	AS	Exchange emails with three investors regarding case updates (.3).	0.3	\$40.50
1/24/2021	KCD	Work on fourth quarterly status report (.9).	0.9	\$315.00
1/27/2021	AS	Exchange emails with twenty investors regarding case inquiries and status (4.0).	4.0	\$540.00
1/29/2021	AS	Exchange emails with seven investors regarding case updates (1.5); review Receiver court filings and forward to R. During for website (.4).	1.9	\$256.50
2/2/2021	KCD	Continue drafting fourth quarter status report (2.1).	2.1	\$735.00
2/2/2021	AS	Review court filing and forward to R. During regarding same (.5).	0.5	\$67.50
2/3/2021	KCD	Continue drafting fourth quarter status report (.8).	0.8	\$280.00

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case /	Administration		
2/3/2021	AS	Telephone calls with eight investors regarding case updates (1.5); exchange emails with two investors regarding case updates (.2).	1.7	\$229.50
2/4/2021	AS	Telephone calls with two investors regarding case updates (.7); review Court filings and forward to R. During for website updates (.3); telephone call with K. Donlon regarding master spreadsheet and revision of same (.3).	1.3	\$175.50
2/5/2021	AS	Telephone calls with three investors regarding case updates (.8); exchange emails with two investors regarding same (.4); review court filings and communicate with R. During regarding website updates (.8).	2.0	\$270.00
2/8/2021	AS	Review investor registrations and communicate with K. Donlon regarding fourth quarterly report (.3); telephone calls with seven investors regarding case updates (1.5); review investor email and forward to Receiver and K. Donlon (.2).	2.0	\$270.00
2/9/2021	KCD	Communicate with PDR and M. Lockwood regarding fund accounting reports (.2) continue drafting fourth quarterly status report (2.5).	2.7	\$945.00
2/9/2021	AS	Exchange emails with Receiver and K. Donlon regarding investor inquiry (.3); telephone calls with two investors regarding case updates (.4); exchange emails with D. Marerro (.3); prepare emails to three investors regarding registration and case updates (.4).	1.4	\$189.00
2/9/2021	MML	Exchange correspondence with S. O'Brien regarding accounting reports (.1).	0.1	\$24.00
2/10/2021	KCD	Continue drafting quarterly status report (.9).	0.9	\$315.00
2/10/2021	AS	Exchange emails with thirteen investors regarding case status and tax issues (1.7); telephone calls with twelve investors regarding Receivership updates (2.5); review investor inquiries and communicate with Receiver and K. Donlon (.8); communicate with D. Marerro regarding investor registrations (.2).	5.2	\$702.00
2/11/2021	AS	Review investor registration and communicate with D. Marrero regarding same (.1); review investor inquiry and forward to K. Donlon (.2); exchange email with investor regarding class action (.1); exchange email with investor regarding tax issues (.3).	0.7	\$94.50
2/11/2021	JR	Review correspondence from A. Stephens regarding investor inquiry (.1).	0.1	\$13.50
2/12/2021	KCD	Revise fourth quarterly status report (.6).	0.6	\$210.00

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	dministration		
2/12/2021	AS	Update master spreadsheet (.5); telephone call with investor regarding tax issues and prepare email with IRS information (.3); exchange emails with five investors (.7); review EquiAlt employee inquiry and forward to K. Donlon (.1).	1.6	\$216.00
2/15/2021	AS	Review Receiver's two related litigation clawback filings and prepare emails to R. During regarding website updates (1.1); review investor inquiry and forward to D. Zamorano and K. Donlon (.1); review fourth quarterly report and prepare email to R. During for website updates (1.5); telephone calls with four investors (.8).	3.5	\$472.50
2/16/2021	RMM	Review fourth quarterly status report (.8).	0.8	\$192.00
2/16/2021	AS	Review judge assignments for related litigation matters and prepare email to R. During for website updates (.2); exchange emails with two investors regarding case updates (.3); review returned mail and update master spreadsheet (.8); telephone calls with five investors regarding case updates (1.2); prepare email to K. Donlon regarding investor call (.2).	2.7	\$364.50
2/17/2021	AS	Telephone call with investor and prepare email to M. Lockwood, K. Donlon and Receiver regarding same (.5); exchange emails with twelve investors regarding case updates (1.9); review court filings and communicate with R. During regarding website updates (.5); communicate via email with D. Marerro regarding master spreadsheet updates of investor contact information (.3).	3.2	\$432.00
2/18/2021	AS	Telephone calls with eight investors regarding case status (1.6); prepare email to investor regarding account information (.2); prepare email to R. During regarding website updates (.4); review voicemails from investors regarding tax and 1099 issues and forward to EquiAlt office (.3).	2.5	\$337.50
2/19/2021	AS	Telephone call with investor regarding closing of business and email exchange with K. Donlon, M. Lockwood and Receiver regarding same (.6); review Receiver filings and forward to R. During for website updates (.5); exchange emails with investors regarding case updates (.2).	1.3	\$175.50
2/22/2021	AS	Review investor voicemails regarding 1099 forms and forward to EquiAlt accounting office (.2); email exchange with K. Donlon (.1); telephone calls with six investors regarding case updates (1.4).	1.7	\$229.50

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	Administration		
2/23/2021	AS	Review Receivership court filings and communicate website updates and status of same with R. During (.5); telephone calls with three investors regarding case status (.7); exchange emails with three investors regarding same (.7); review voicemails from investors and update master spreadsheet (.6).	2.5	\$337.50
2/24/2021	AS	Review voicemail and email exchange with Receiver and D. Marrero regarding same (.2); prepare email to R. During regarding website updates (.1); telephone calls with five investors regarding case updates (1.0); email exchange with M. Hinchey regarding investor registration (.2).	1.5	\$202.50
2/25/2021	AS	Exchange emails with two investors regarding case updates (.3); telephone calls with two investors regarding same (.5).	0.8	\$108.00
2/26/2021	AS	Telephone calls with five investors regarding case updates (1.1); update master spreadsheet (.2); exchange emails with three investors regarding tax issues and clawback litigation (.6); telephone call with financial advisor regarding closure of custodial accounts (.3); prepare email to K. Donlon and M. Lockwood regarding same (.1).	2.3	\$310.50
3/1/2021	AS	Telephone call with D. Marerro and exchange emails with K. Donlon concerning investor (.2); telephone calls with three investors regarding case status (.7).	0.9	\$121.50
3/2/2021	AS	Exchange emails with three investors regarding registration and case updates (.7); review case filings in related litigation and prepare email to R. During regarding website updates (.3); exchange emails with M. Hinchey regarding investor inquiries (.2); telephone calls with three investors regarding case updates (.7).	1.9	\$256.50
3/2/2021	JR	Communicate with E-Hounds regarding domain and website bills and expenses (.1).	0.1	\$13.50
3/3/2021	AS	Exchange emails with two investors regarding case updates (.4); telephone calls with two investors regarding same (.3); exchange emails with R. During (.1); review investor registrations (.2).	1.0	\$135.00
3/4/2021	AS	Review court order and forward to R. During for website updates (.2); telephone calls with two investors regarding case updates (.3).	0.5	\$67.50
3/5/2021	AS	Exchange emails with two investors regarding case updates (.4); telephone calls with two investors regarding same (.6); exchange emails with M. Hinchey regarding fund information (.2); update master spreadsheet and investor files (.5).	1.7	\$229.50

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case Administration			
3/8/2021	AS	Review court filing and non-party filings and communicate with R. During regarding same for website updates (.5); telephone calls with five investors regarding case updates (1.3).	1.8	\$243.00
3/8/2021	JR	Communicate with Receiver and legal team regarding call from investor about incorrect information on 1099 form (.1).	0.1	\$13.50
3/10/2021	AS	Exchange emails with two investors (.3); prepare email to J. Rizzo regarding master spreadsheet (.1); update master spreadsheet per M. McKinley's request (.1); review Receiver's motion and forward to R. During for website update (.2).	0.7	\$94.50
3/11/2021	AS	Exchange emails with three investors regarding case updates (.6); telephone calls with seven investors regarding same (1.2); prepare email to Receiver and legal team regarding interest in property (.1); prepare emails to M. Lockwood regarding investor inquiries (.2); exchange emails with M. Lockwood, K. Donlon and Receiver regarding investor inquiries (.2).	2.3	\$310.50
3/11/2021	JR	Review correspondence from investors and legal team regarding status and account questions (.1).	0.1	\$13.50
3/11/2021	MML	Exchange correspondence with A. Stephens regarding investor E.J. (.1); exchange correspondence with A. Stephens regarding investor N.L. (.1).	0.2	\$48.00
3/12/2021	AS	Exchange emails with M. Hinchey regarding investor registrations (.2); exchange emails with investor regarding confirmation of investment (.1); telephone calls with two investors regarding case updates (.3); update master spreadsheet (.2); exchange emails with three investors (.5); prepare email to Receiver (.1).	1.4	\$189.00
3/15/2021	AS	Review investor email and forward to Receiver (.1); review investor voicemails (.4).	0.5	\$67.50
3/15/2021	JR	Communicate with KTek regarding updates to website (.1).	0.1	\$13.50
3/16/2021	AS	Telephone calls with four investors regarding case updates (.9); exchange emails with investor regarding same (.2).	1.1	\$148.50
3/18/2021	AS	Telephone call with investor and prepare email to K. Donlon regarding same (.2); review investor email and Receiver's response (.1); exchange emails with two investors regarding case updates (.2); telephone calls with two investors regarding tax issues and prepare email to accounting (.5).	1.0	\$135.00
3/22/2021	AS	Telephone calls with five investors regarding case updates (1.3); update master spreadsheet (.5).	1.8	\$243.00

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Date	TKPR	Description of Services	Hours	Amount		
CASE	CASE Case Administration					
3/22/2021	JR	Communicate with SEC regarding Accellion login issues (.2).	0.2	\$27.00		
3/23/2021	AS	Telephone calls with two investors (.3).	0.3	\$40.50		
3/24/2021	AS	Exchange emails with three investors regarding registration and case updates (.3).	0.3	\$40.50		
3/24/2021	JR	Review voice message from investor and related correspondence from A. Stephens (.1).	0.1	\$13.50		
3/25/2021	AS	Telephone calls with three investors regarding case updates (.7).	0.7	\$94.50		
3/26/2021	AS	Review court filings and forward same to R. During for website updates (.5).	0.5	\$67.50		
3/29/2021	AS	Telephone calls with two investors regarding case status (.5).	0.5	\$67.50		
		Total: Case Administration	92.80	\$14,384.50		
CLAIM	Claim	s Administration and Objections				
2/11/2021	KCD	Confer with M. Lockwood regarding claims process (.1).	0.1	\$35.00		
2/17/2021	MML	Review inquiry from investor regarding LLC and related communications (.1).	0.1	\$24.00		
2/19/2021	MML	Exchange correspondence with A. Stephens regarding inquiry from investor H.H. regarding distributions (.1).	0.1	\$24.00		
2/26/2021	MML	Exchange correspondence with A. Stephens regarding investor's question regarding closing IRA and possible distributions through the claims process (.1).	0.1	\$24.00		
3/18/2021	JR	Review correspondence from investor regarding claim process inquiry (.1); review correspondence from Receiver to investor in response to investor claim inquiry (.1).	0.2	\$27.00		
3/18/2021	MML	Review inquiry from H.H. regarding dissolution of business and Receiver's response to same (.1).	0.1	\$24.00		
3/31/2021	JR	Review investor inquiry regarding status of claims process and distributions (.1); review correspondence from Receiver regarding preparation of claims motion (.1).	0.2	\$27.00		
3/31/2021	MML	Review correspondence from Receiver and K. Donlon regarding claims motion (.1); review documents and prepare correspondence to K. Donlon regarding same (.2); communicate with M. Gura regarding same (.1).	0.4	\$96.00		
		Total: Claims Administration and Obj	1.30	\$281.00		
WFFF	Work	on Fees Motions				

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
1/1/2021	MML	NO CHARGE: Review correspondence from K. Donlon regarding third party invoices (.1).	0.1	\$0.00
1/3/2021	KAP	NO CHARGE: Review and revise time entries (1.8); send corrected time entries to M. Hill for additional revisions (.1).	1.9	\$0.00
1/4/2021	MML	NO CHARGE: Review E-Hounds October, November, and December invoices and update spreadsheet for same (.2); review correspondence regarding no Baskin October invoice (.1); review communications from K. Donlon regarding third party invoices (.1); review correspondence from M. Hill regarding billing questions (.1); prepare correspondence to C. McDonald regarding December invoice (.1).	0.6	\$0.00
1/5/2021	RMM	NO CHARGE: Confer with K. Donlon and M. Hill regarding billing for the motion for summary judgment in the Volcan 4x4 case (.5); review report and recommendation regarding the Receiver's Third Fees Motion (.5).	1.0	\$0.00
1/5/2021	JR	NO CHARGE: Receipt and review of report and recommendation on third request for fees (.1); update master spreadsheet related to approved fees (.1).	0.2	\$0.00
1/5/2021	MML	NO CHARGE: Exchange correspondence with K. Paulson, M. Hill and B. Nguyen regarding billing questions (.3); additional correspondence with K. Paulson regarding same (.1).	0.4	\$0.00
1/6/2021	MML	NO CHARGE: Exchange correspondence with M. Hill regarding Receiver's invoice (.1); review report and recommendation on Receiver's third application for fees (.1); exchange correspondence with K. Paulson regarding prebills (.1).	0.3	\$0.00
1/13/2021	MML	NO CHARGE: Review December prebills (1.0); exchange correspondence with M. Hill regarding same (.2); exchange correspondence with B. Nguyen regarding revised prebills (.1).	1.3	\$0.00
1/14/2021	KAP	NO CHARGE: Review and revise prebills (1.3); send corrected prebills to M. Hill (.1).	1.4	\$0.00
1/14/2021	MML	NO CHARGE: Review edits to December prebills (.1).	0.1	\$0.00
1/15/2021	MML	NO CHARGE: Communications with K. Donlon regarding Receiver's time entries (.2); telephone call with A. Whitby regarding same (.2); exchange correspondence with A. Whitby regarding same (.1).	0.5	\$0.00
1/19/2021	JR	NO CHARGE: Review and calculate information for payment of fees per communications with K. Donlon and Receiver (.2).	0.2	\$0.00

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SERVICES				

#### S

Date	TKPR	Description of Services	Hours	Amount
WFEE	Work o	on Fees Motions		
1/19/2021	KAP	NO CHARGE: Review and revise prebills (.1); send corrections to M. Hill (.1).	0.2	\$0.00
1/19/2021	MML	NO CHARGE: Telephone call with K. Paulson regarding prebills (.3); review Baskin's December invoice (.1); exchange correspondence with M. Hill regarding edits from K. Paulson (.1); exchange correspondence with B. Nguyen regarding new prebill for December (.1); exchange correspondence with A. Whitby regarding Receiver's time (.1); telephone call with A. Whitby regarding same (.1); review correspondence from K. Donlon regarding Receiver's time (.1); review email from Receiver with additional entries (.2).	1.1	\$0.00
1/20/2021	MML	NO CHARGE: Review PDR December invoice (.1); review Freeborn November bill (.1); update third party spreadsheet for same (.1); exchange correspondence with A. Whitby regarding Receiver's time entries (.1); exchange correspondence with K. Donlon regarding third party invoices and Receiver's time (.1); review correspondence from K. Donlon to M. Yip (.1); exchange correspondence with K. Paulson regarding revised prebills (.1); review time entries from Receiver (.2).	0.9	\$0.00
1/21/2021	MML	NO CHARGE: Work on motion for fees (2.0); review Yip Associates invoices for October through December (.4); prepare correspondence to K. Donlon regarding same (.1).	2.5	\$0.00
1/22/2021	MML	NO CHARGE: Review new time entries added to team prebill for October through December (2.0); exchange correspondence with M. Hill regarding further revisions (.2); review communications regarding time entries relating to New York condominium (.1); exchange correspondence with K. Donlon regarding Receiver's time (.1); exchange correspondence with J. Perez regarding time entries (.1).	2.5	\$0.00
1/23/2021	MML	NO CHARGE: Review and revise Receiver's time entries (1.5); exchange correspondence with K. Donlon regarding same (.1).	1.6	\$0.00
1/24/2021	KCD	NO CHARGE: Review fees (.5).	0.5	\$0.00
1/25/2021	KAP	NO CHARGE: Review and revise prebills (1.7); send corrections to M. Hill (.1).	1.8	\$0.00
1/25/2021	MML	NO CHARGE: Review revisions to prebills (.1).	0.1	\$0.00
1/26/2021	КАР	NO CHARGE: Review and revise edited prebills for October through December (.2); review and revise prebills for Receiver's time entries (.4); send corrections to same to M. Hill (.1).	0.7	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work o	on Fees Motions		
1/26/2021	MML	NO CHARGE: Telephone call with K. Donlon regarding fees application (.4); review and revise Receiver's prebill (.5); review additional edits to prebills and related communications (.2); review additional time entries from Receiver (1.0); communicate with M. Hill, K. Donlon, and K. Paulson regarding billing (.3).	2.4	\$0.00
1/27/2021	KAP	NO CHARGE: Review and revise prebills for Receiver's time entries (5.4); exchange emails regarding same with M. Hill (.1).	5.5	\$0.00
1/27/2021	MML	NO CHARGE: Review communications with Freeborn (.1); review Freeborn December invoice (.1); update third party spreadsheet (.1); review communications with Yip Associates regarding invoice (.1); review revised invoice (.1); revise motion for fees (.8); review revisions to prebills and related communications (.2); communicate with K. Paulson and M. Hill regarding same (.1); exchange correspondence regarding revised summary for Yip Associates (.1); telephone call with M. Yip regarding same (.1); exchange correspondence with K. Paulson regarding certain time entries (.2); prepare correspondence to K. Donlon regarding draft motion for fees (.1).	2.1	\$0.00
1/28/2021	KAP	NO CHARGE: Review and revise prebills for Receiver's time for 4th quarter of 2020 (4.3); exchange emails with M. Lockwood regarding same (.1).	4.4	\$0.00
1/28/2021	MML	NO CHARGE: Exchange correspondence with K. Paulson regarding time entry questions for Receiver (.3).	0.3	\$0.00
1/29/2021	KAP	NO CHARGE: Review and revise prebills for Receiver's time for 4th quarter of 2020 (3.3); communicate with M. Lockwood regarding same (.4).	3.7	\$0.00
1/29/2021	MML	NO CHARGE: Review prebill for January (.1); communicate with K. Paulson regarding Receiver's time for 4th quarter (.4).	0.5	\$0.00
2/1/2021	KAP	NO CHARGE: Review and revise prebills for Receiver's time for 4th quarter of 2020 (1.2); send corrections to M. Hill (.1); exchange emails with M. Lockwood regarding same. (.1).	1.4	\$0.00
2/1/2021	MML	NO CHARGE: Telephone call with K. Paulson regarding billing (.5); review emails from K. Paulson regarding specific questions (.2); review revisions to prebills (.1); exchange emails with K. Paulson regarding same (.1); review E-Hounds January invoice (.1).	1.0	\$0.00
2/2/2021	KCD	NO CHARGE: Review and revise fees motion (.4).	0.4	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
2/2/2021	KAP	NO CHARGE: Exchange emails with M. Lockwood, K. Donlon, and M. McKinley regarding time to be included in prebills (.1); review and revise prebills (.7); send revisions to M. Hill (.1).	0.9	\$0.00
2/2/2021	MML	NO CHARGE: Exchange correspondence with K. Paulson regarding prebills (.2); prepare correspondence to K. Donlon regarding questions on Receiver's billing (.3); exchange correspondence with K. Donlon regarding prebills (.1); exchange correspondence with M. McKinley regarding certain time entry (.1); review additional communications with M. McKinley regarding time entry (.1); review additional entries for Receiver (.1).	0.9	\$0.00
2/3/2021	KAP	NO CHARGE: Review and revise edited prebills for Receiver's time for 4th quarter 2020 (2.0); exchange emails with M. Lockwood and K. Donlon regarding same (.1); send corrections to Receiver's prebills to M. Hill (.1).	2.2	\$0.00
2/3/2021	MML	NO CHARGE: Exchange correspondence with K. Paulson regarding certain time entries (.2); review revisions to Receiver's prebill (.1).	0.3	\$0.00
2/4/2021	JR	NO CHARGE: Calculate fees per review of order adopting report and recommendation and per request of K. Donlon (.5).	0.5	\$0.00
2/4/2021	MML	NO CHARGE: Revise motion for fees (.3); communicate with K. Donlon regarding prebills (.1); communicate with K. Paulson and M. Hill regarding same (.1); review additional entries for Receiver and related communications (.2); communicate with K. Paulson regarding same (.1); review order granting application for fees (.1).	0.9	\$0.00
2/7/2021	KCD	NO CHARGE: Review and revise prebills (1.7).	1.7	\$0.00
2/8/2021	KAP	NO CHARGE: Review and revise team and Receiver's prebills for 4th quarter of 2020 (1.5); send corrections to M. Lockwood (.1); communicate with M. Lockwood regarding same (.2).	1.8	\$0.00
2/8/2021	MML	NO CHARGE: Review edits to prebills (.5); exchange correspondence with K. Donlon regarding same (.1); exchange correspondence with K. Paulson regarding bill review (.2); telephone call with K. Paulson regarding same (.1); review edits to Receiver's prebills (.1); prepare correspondence to M. Hill regarding additional revisions (.2); telephone call with M. Hill regarding billing (.1); review and revise further revisions to prebills (.2); review revised prebills (.3); revise application for fees (.7); prepare correspondence to K. Donlon regarding revised application for fees (.1).	2.6	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
2/9/2021	MML	NO CHARGE: Communicate with K. Donlon regarding fees application (.2); telephone call with M. Gura regarding zip file for third party invoices (.1); prepare correspondence to Receiver regarding prebills and third-party invoices (.1); prepare correspondence to B. Nguyen regarding Receiver's costs (.1); review communications between K. Donlon and B. Nguyen regarding same (.1).	0.6	\$0.00
2/10/2021	KCD	NO CHARGE: Revise fees motion (.8).	0.8	\$0.00
2/10/2021	MML	NO CHARGE: Telephone call with Receiver regarding fees application (.2); exchange correspondence with K. Donlon regarding same (.1); communicate with M. Hill regarding exhibits (.2); communicate with B. Nguyen regarding final bills (.1).	0.6	\$0.00
2/11/2021	KCD	NO CHARGE: Confer with M. Lockwood regarding fees motion (.1); confer with Receiver regarding fees motion (.1); revise fees motion (.2).	0.4	\$0.00
2/11/2021	MML	NO CHARGE: Review final bills (.3); revise application for fees (.8); communicate with K. Donlon regarding same (.1); communicate with B. Nguyen regarding costs (.1).	1.3	\$0.00
3/1/2021	MML	NO CHARGE: Prepare correspondence to legal team regarding time entry (.1); review E-Hounds February invoice (.1); exchange correspondence with A. Sharp regarding payment of past invoices (.1); exchange correspondence with J. Rizzo and K. Donlon regarding same (.1).	0.4	\$0.00
3/4/2021	MML	NO CHARGE: Review report and recommendation on fourth motion for fees (.1).	0.1	\$0.00
3/8/2021	MML	NO CHARGE: Exchange correspondence with M. Hill regarding prebills (.2).	0.2	\$0.00
3/9/2021	MML	NO CHARGE: Communicate with M. Hill and B. Nguyen regarding prebills (.1).	0.1	\$0.00
3/18/2021	MML	NO CHARGE: Review communication from K. Donlon regarding billing (.1).	0.1	\$0.00
3/19/2021	MML	NO CHARGE: Review prebills for January and February (2.6); communicate with K. Donlon regarding same (.1).	2.7	\$0.00
3/26/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding March prebills (.1).	0.1	\$0.00
3/29/2021	MML	NO CHARGE: Further review prebills for January and February (.3); exchange correspondence with A. Whitby regarding same (.1); prepare correspondence to K. Paulson regarding same (.1).	0.5	\$0.00

Page:       Page: <th< th=""><th>Cas</th><th>e 8:20-cv-</th><th>-00325-MSS-AEP Document 320-6 Filed 06/01/21</th><th>Page 49 of 53 P May 24, 2 Client: Matter: Invoice #:</th><th>021 025305 002068</th></th<>	Cas	e 8:20-cv-	-00325-MSS-AEP Document 320-6 Filed 06/01/21	Page 49 of 53 P May 24, 2 Client: Matter: Invoice #:	021 025305 002068
Date WFEE         TKPR Work on Fees Motions         Bescription of Services         Hours         Amount           3/31/2021         MML         NO CHARGE: Exchange correspondence with K. Donlon (.1), review correspondence from Freeborn regarding January invoices (.1).         0.2         \$0.00           3/31/2021         MML         NO CHARGE: Exchange correspondence with K. Donlon (.1), review correspondence from Freeborn regarding January invoice (.1).         0.2         \$0.00           Total Professional Service:         425.3         \$73,603.50           DISBURSEMENTS         Description of Disbursements         425.3         \$73,603.50           D15000000000000000000000000000000000000				Page:	48
WFEF         Work on Fees Motions         0.2         \$0.00           3/31/2021         MML         NO CHARGE: Exchange correspondence with K. Donion regarding Receiver's time entries and third party invoices (1):         0.2         \$0.00           1/1000         [1]: review correspondence from Freeborn regarding January invoice (1):         \$0.00         \$0.00           Total Professional Service:         \$1.50         \$0.00           DISBURSEMENTS         Description of Disbursements         \$1.60         \$0.00           3/26/2021         Photocopies @.15 each (1134 @.\$0.15)         \$170.10           E102         Outside Printurg         \$202.85           E105         Telephone         \$202.85           21/2/2021         Conference Call Charges on 1.27.21         \$65.55           1/5/2021         Conference Call Charges on 1.27.21         \$65.55           1/5/2021         Conference Call Charges         \$0.75           1/19/2021         Conference Call Charges         \$0.75           1/19/2021         Conference Call Charges         \$0.47           1/12/2021         Conference Call Charges         \$0.47           1/12/2021         Conference Call Charges         \$0.47           1/12/2021         Conference Call Charges         \$0.47           1/12/202	SERVICE	S			
3/31/2021       MML       NO CHARGE: Exchange correspondence with K. Donion negarding Receiver's time entries and third party invoices (.1); review correspondence from Freeborn regarding January invoice (.1).       0.2       \$0.00         Total: Work on Fees Motions       61.50       \$0.00         DisBURSEMENTS         Date       Description of Disbursements       Amount         E101       Photocopies         3/26/2021       Photocopies @.15 each (1134 @.\$0.15)       \$170.10         E102       Outside Printing         1/27/2021       Tampa Legal Copies, Inc Copy Service- Outside copy services       \$202.85         E105       Telephone       2/1/2020       Conference Call Charges on 1.27.21       \$6.55         1/19/2021       Conference Call Charges       \$4.66       \$11.92         1/19/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$4.63         2/1/2021       Conference Call Charges       \$4.53         2/1/2021       Conference Call Cha	Date	TKPR	Description of Services	Hours	Amount
regarding Receiver's time entries and third party invoices (.1); review correspondence from Freeborn regarding January invoice (.1).       61.50       \$0.00         Total Professional Service:       425.3       \$78,603.50         DISBURSEMENTS         Date       Description of Disbursements       Amount         E101       Photocopies       3/26/2021       Photocopies @ .15 each (1134 @ \$0.15)       \$170.10         E102       Outside Printip       \$202.85       \$202.85         E105       Telephone       \$202.85       \$202.85         2/1/2021       Tampa Legal Copies, Inc Copy Service- Outside copy services       \$202.85         1/5/2021       Conference Call Charges on 1.27.21       \$6.55         1/1/2021       Conference Call Charges on 1.27.21       \$6.55         1/1/2021       Conference Call Charges on 1.27.21       \$0.47         1/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges on 1.27.21       \$0.47 <td>WFEE</td> <td>Work o</td> <td>on Fees Motions</td> <td></td> <td></td>	WFEE	Work o	on Fees Motions		
Total Professional Service:425.3\$78,603.50DISBURSEMENTSDescription of DisbursementsAmountE101Photocopies.15 each (1134 @ \$0.15)\$170.10E102Outside Printier\$202.85E105Telephone\$202.852/1/2020Conference Call Charges on 1.27.21\$6.551/5/2021Conference Call Charges\$4.661/19/2021Conference Call Charges\$4.661/19/2021Conference Call Charges\$4.751/1/2021Conference Call Charges\$4.531/1/2021Conference Call Charges\$4.542/1/2021Conference Call Charges\$4.542/1/2021Conference Call Charges\$4.542/1/2021Conference Call Charges\$4.531/1/2021Conference Call Charges\$6.553/1/1/2021Conference Call Charges\$6.553/1/1/2021Conference Call Charges\$6.553/1/1/2021Conference Call Charges\$6.553/1/2021Conference Call Charges\$6.553/1/2021Conference Call Charges\$6.553/1/2021Conference Call Charges\$6.553/1/2021Conference Call Charges\$6.553/1/2021Westlaw\$309.793/23/2021Westlaw\$309.791/1/2021Ele Services\$309.793/23/2021Westlaw\$309.791/15/2021FelEx to Sara Loughridge, Naples Motor Sports, Inc.\$20.45	3/31/2021	MML	regarding Receiver's time entries and third party invoices (.1); review correspondence from Freeborn regarding	0.2	\$0.00
DISBURSEMENTS         Description of Disbursements         Amount           E101         Photocopies         Amount           5/26/2021         Photocopies @.15 each (1134 @ \$0.15)         \$170.10           E102         Outside Printing         \$202.85           E102         Outside Printing         \$202.85           E105         Telephone         \$202.85           2/1/2020         Conference Call Charges on 1.27.21         \$6.55           1/5/2021         Conference Call Charges on 1.27.21         \$6.55           1/1/9021         Conference Call Charges on 1.27.21         \$6.55           1/1/2021         Conference Call Charges on 1.27.21         \$6.55           1/1/2021         Conference Call Charges on 1.27.21         \$0.47           2/1/2021         Conference Call Charges on 1.27.21         \$6.55           3/11/2021         Conference Call Charges on 1.27.21         \$6.55           3/11/2021         Conference Call Charges on 1.27.21         \$6.55           3/11/2021         Conference Call Charges on 1.27.21			Total: Work on Fees Motions	61.50	\$0.00
Date         Description of Disbursements         Amount           E101         Photocopies         \$170.0           3/26/2021         Photocopies@.15 each (1134 @ \$0.15)         \$170.0           E102         Outside Print=         \$170.0           1/27/2021         Tampa Legal Copies, Inc Copy Service- Outside copy services         \$202.85           E105         Telephone         \$202.85           1/27/2020         Conference Call Charges on 1.27.21         \$655           1/5/2021         Conference Call Charges         \$466           1/19/2021         Conference Call Charges         \$476           1/19/2021         Conference Call Charges         \$476           1/19/2021         Conference Call Charges         \$476           1/1/2021         Conference Call Charges         \$476           1/1/2021         Conference Call Charges         \$476           1/1/2021         Conference Call Charges         \$456           2/1/2021         Conference Call Ch			Total Professional Service	425.3	\$78,603.50
E101       Photocopies         3/26/2021       Photocopies @.15 each (1134 @ \$0.15)       \$170.0         E102       Outside Printer         1/27/2021       Tampa Legal Copies, Inc Copy Service- Outside copy services       \$202.85         E105       Telephone       \$202.85         2/1/2020       Conference Call Charges on 1.27.21       \$6.55         1/5/2021       Conference Call Charges on 1.27.21       \$6.55         1/1/2021       Conference Call Charges       \$4.66         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges on 1.27.21       \$0.75         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges on 1.27.21       \$0.75         1/1/2021       Conference Call Charges on 1.27.21       \$0.75         3/1/2021       Conference Call Charges on 1.27.21       \$0.75	DISBURS	SEMENTS			
3/26/2021       Photocopies @ .15 each (1134 @ \$0.15)       \$170.10         E102 Outside Printi-         1/27/2021       Tampa Legal Copies, Inc Copy Service- Outside copy services       \$202.85         E105 Telephone         2/1/2020       Conference Call Charges on 1.27.21       \$6.55         1/5/2021       Conference Call Charges       \$4.66         1/19/2021       Conference Call Charges       \$11.29         1/19/2021       Conference Call Charges on 1.27.21       \$4.54         1/19/2021       Conference Call Charges       \$11.29         1/19/2021       Conference Call Charges on 1.27.21       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$1.03         3/11/2021       Conference Call Charges       \$3.67         1/1/2021       Vestlaw       \$2020(113 @ \$0.10)         3/23/2021       Westlaw       \$3.09,79 <t< td=""><td>Date</td><td></td><td>Description of Disbursements</td><td></td><td>Amount</td></t<>	Date		Description of Disbursements		Amount
E102       Outside Printing         1/27/2021       Tampa Legal Copies, Inc Copy Service- Outside copy services       \$202.85         E105       Telephone       \$202.85         2/1/2020       Conference Call Charges on 1.27.21       \$6.55         1/5/2021       Conference Call Charges       \$4.66         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges       \$11.29         1/21/2021       Conference Call Charges       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         1/19/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$6.55         3/11/2021       Conference Call Charges       \$6.55         1/1/2021       Conference Call Charges       \$11.30         2/20201       Conference Call Charges       \$3.67         1/11/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$309.79         3/23/2021       Westlaw <td>E101</td> <td>Photocopie</td> <td>es</td> <td></td> <td></td>	E101	Photocopie	es		
1/27/2021       Tampa Legal Copies, Inc Copy Service- Outside copy services       \$202.85         E105       Telephone          2/1/2020       Conference Call Charges on 1.27.21       \$6.55         1/5/2021       Conference Call Charges       \$4.66         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges       \$11.29         1/21/2021       Conference Call Charges       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         1/12/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         1/1/2021       Conference Call Charges on 1.27.21       \$0.47         1/1/2021       Conference Call Charges on 1.27.21       \$0.47         1/1/2021       Vestaw       \$0.20         3/23/2021       Westaw <td>3/26/2021</td> <td>l</td> <td>Photocopies @ .15 each (1134 @ \$0.15)</td> <td></td> <td>\$170.10</td>	3/26/2021	l	Photocopies @ .15 each (1134 @ \$0.15)		\$170.10
E105         Telephone           2/1/2020         Conference Call Charges on 1.27.21         \$6.55           1/5/2021         Conference Call Charges         \$4.66           1/19/2021         Conference Call Charges         \$0.75           1/19/2021         Conference Call Charges         \$11.29           1/21/2021         Conference Call Charges         \$4.54           2/1/2021         Conference Call Charges on 1.27.21         \$0.47           1/21/2021         Conference Call Charges on 1.27.21         \$0.47           2/1/2021         Conference Call Charges         \$6.55           3/11/2021         Conference Call Charges         \$3.67           E106         On Line Reserve         \$3.07           1/1/2021         PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)         \$3.09.79           3/23/2021         Westlaw         \$3.09.79         \$3.09.79           E107         Del. Services/Messengers         \$3.09           1/15/2021         FedEx to Sara Loughridge, Naples Motor Sports, Inc.<	E102	Outside Pr	inting		
2/1/2020       Conference Call Charges on 1.27.21       \$6.55         1/5/2021       Conference Call Charges       \$4.66         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges       \$11.29         1/19/2021       Conference Call Charges       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$6.55         3/11/2021       Conference Call Charges       \$1.60         I/1/2021       Conference Call Charges       \$1.30         2/2020(113 @ \$0.10)       \$2020 (113 @ \$0.10)       \$309.79         J/1/2021       Westlaw       \$309.79         E107       Del. Services/mere	1/27/2021		Tampa Legal Copies, Inc Copy Service- Outside copy se	ervices	\$202.85
1/5/2021     Conference Call Charges     \$4.66       1/19/2021     Conference Call Charges     \$0.75       1/19/2021     Conference Call Charges     \$11.29       1/21/2021     Conference Call Charges on 1.27.21     \$4.54       2/1/2021     Conference Call Charges on 1.27.21     \$0.47       2/1/2021     Conference Call Charges on 1.27.21     \$0.47       2/1/2021     Conference Call Charges on 1.27.21     \$0.47       2/1/2021     Conference Call Charges     \$6.55       3/11/2021     Conference Call Charges     \$3.67       E106     On Line Ressert     \$3.67       1/1/2021     PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)     \$309.79       3/23/2021     Westlaw     \$309.79       E107     Del. Services/messengers     \$20.45       1/15/2021     FedEx to Sara Loughridge, Naples Motor Sports, Inc.     \$20.45	E105	Telephone			
1/5/2021       Conference Call Charges       \$4.66         1/19/2021       Conference Call Charges       \$0.75         1/19/2021       Conference Call Charges       \$11.29         1/21/2021       Conference Call Charges on 1.27.21       \$4.54         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$6.55         3/11/2021       Conference Call Charges       \$3.67         E106       On Line Reservert       \$3.67         1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$309.79         3/23/2021       Westlaw       \$309.79         E107       Del. Services/mesengers       \$309.79         1/15/2021       FedEx to Sara Loughridge, Naples Motor Sports, Inc.       \$20.45	2/1/2020	-	Conference Call Charges on 1.27.21		\$6.55
1/19/2021       Conference Call Charges       \$11.29         1/21/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$6.55         3/11/2021       Conference Call Charges       \$3.67         E106 On Line Reserve         1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$11.30         3/23/2021       Westlaw       \$309.79         E107 Del. Services/mers       FedEx to Sara Loughridge, Naples Motor Sports, Inc.       \$20.45	1/5/2021		-		
1/21/2021     Conference Call Charges     \$4.54       2/1/2021     Conference Call Charges on 1.27.21     \$0.47       2/1/2021     Conference Call Charges     \$6.55       3/11/2021     Conference Call Charges     \$3.67       E106     On Line Reserver     \$11.30       1/1/2021     PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)     \$11.30       3/23/2021     Westlaw     \$309.79       E107     Del. Services/Sengers     \$20.45	1/19/2021		Conference Call Charges		\$0.75
2/1/2021       Conference Call Charges on 1.27.21       \$0.47         2/1/2021       Conference Call Charges       \$6.55         3/11/2021       Conference Call Charges       \$3.67         E106 On Line Research       \$3.67         1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$11.30         3/23/2021       Westlaw       \$309.79         E107 Del. Services/Bergers       \$20.45	1/19/2021		Conference Call Charges		\$11.29
2/1/2021       Conference Call Charges       \$6.55         3/11/2021       Conference Call Charges       \$3.67         E106       On Line Research       \$3.67         1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$11.30         3/23/2021       Westlaw       \$309.79         E107       Del. Services/Messengers       \$20.45	1/21/2021	l	Conference Call Charges		\$4.54
3/11/2021       Conference Call Charges       \$3.67         E106       On Line Research       5000         1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$11.30         3/23/2021       Westlaw       \$309.79         E107       Del. Services/Bersengers       \$20.45         1/15/2021       FedEx to Sara Loughridge, Naples Motor Sports, Inc.       \$20.45	2/1/2021		Conference Call Charges on 1.27.21		\$0.47
E106       On Line Research         1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)         3/23/2021       Westlaw         500       Westlaw         500       Felor         600       Del. Services/Resengers         1/15/2021       FedEx to Sara Loughridge, Naples Motor Sports, Inc.         500       \$20.45	2/1/2021		Conference Call Charges		\$6.55
1/1/2021       PACER printing costs for month of October 1, 2020-December 31, 2020 (113 @ \$0.10)       \$11.30         3/23/2021       Westlaw       \$309.79         E107 Del. Services/Bersengers         1/15/2021       FedEx to Sara Loughridge, Naples Motor Sports, Inc.       \$20.45	3/11/2021	l	Conference Call Charges		\$3.67
2020 (113 @ \$0.10)         3/23/2021       Westlaw       \$309.79         E107       Del. Services/Messengers       \$20.45         1/15/2021       FedEx to Sara Loughridge, Naples Motor Sports, Inc.       \$20.45	E106	On Line Re	esearch		
3/23/2021Westlaw\$309.79E107Del. Services/Messengers1/15/2021FedEx to Sara Loughridge, Naples Motor Sports, Inc.\$20.45	1/1/2021			mber 31,	\$11.30
1/15/2021FedEx to Sara Loughridge, Naples Motor Sports, Inc.\$20.45	3/23/2021	l			\$309.79
	E107	Del. Servic	es/Messengers		
	1/15/2021		FedEx to Sara Loughridge, Naples Motor Sports, Inc.		\$20.45

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DISBUR	SEMENTS			
Date		Description of Disbursements		Amount
E107	Del. Services/I	Messengers		
2/11/202	21	Choice Express- Courier Service- Choice Express delivery to Federal Courthouse		\$31.36
2/18/202	21	FedEx to Judge Jennifer X. Gabbard		\$24.58
3/26/202	21	FedEx to Hon. Jennifer X. Gabbard. CCT JGD		\$20.84
3/26/202	21	FedEx to Charles Guy		\$20.84
3/30/202	21	FedEx to Carolyn C. Meadows		\$17.39
E112	Court Fees			
2/11/202	21	Clerk of Court, Middle District of Florida- Clerk of Court- Fee to obtain a certified copy of Order Granting Sale of Real Property (Doc 261))		\$12.50
E123	Web-Related E	Expenses		
1/1/2021	I	K. Tek Systems, Inc Web Related Expenses- Monthly service work order		\$300.00
1/4/2021	I	Burton Wiand- Web Related Expenses- Spectrum Net Designs - Auction website		\$250.00
1/5/2021	I	K. Tek Systems, Inc Web Related Expenses- Business website monthly		\$50.00
2/1/2021	I	K. Tek Systems, Inc Web Related Expenses- Business website hosting monthly		\$50.00
2/1/2021	I	K. Tek Systems, Inc Web Related Expenses- Monthly service work order		\$375.00
3/1/2021	I	K. Tek Systems, Inc Web Related Expenses- Business website		\$50.00
3/1/2021	I	K. Tek Systems, Inc Web Related Expenses- Monthly service work order		\$450.00
E124	Other			
2/3/2021	I	American Express- Miscellaneous- Notice of Sale		\$172.50
		Total Disbursements	:	\$2,593.02

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	Total Services		\$78,603.50	
	Total Disbursement	S	\$2,593.02	
	Total Current Charg	jes		\$81,196.52
	Previous Balance		\$	214,168.18
	Less Payments		(\$	119,062.03)
	PAY THIS AMOUN	т	\$	176,302.67

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#### TASK RECAP

Services

Project No.	Hours	Amount
ASDIS - ASDIS	73.40	\$16,121.50
ASSET - ASSET	118.40	\$33,014.00
BUSIN - BUSIN	77.90	\$14,802.50
CASE - CASE	92.80	\$14,384.50
CLAIM - CLAIM	1.30	\$281.00
WFEE - WFEE	61.50	\$0.00
	0.00	\$0.00
	0.00	\$0.00
	425.30	\$78,603.50

#### Disbursements

Project No.	Amount
Photocopies	\$170.10
Outside Printing	\$202.85
Telephone	\$38.48
On Line Research	\$321.09
Del. Services/Messengers	\$150.50
Court Fees	\$12.50
Web-Related Expenses	\$1,525.00
Other	\$172.50
	\$2,593.02

#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
KCD	Katherine C. Donlon	ASDIS - ASDIS	5.60	\$1,960.00
KCD	Katherine C. Donlon	ASSET - ASSET	44.50	\$15,575.00
KCD	Katherine C. Donlon	BUSIN - BUSIN	0.40	\$140.00
KCD	Katherine C. Donlon	CASE - CASE	8.00	\$2,800.00
KCD	Katherine C. Donlon	CLAIM - CLAIM	0.10	\$35.00
KCD	Katherine C. Donlon	WFEE - WFEE	3.80	\$0.00
JJP	Jared J. Perez	ASSET - ASSET	1.50	\$525.00
RMM	Max McKinley	ASDIS - ASDIS	47.70	\$11,448.00
RMM	Max McKinley	ASSET - ASSET	68.00	\$16,320.00
RMM	Max McKinley	BUSIN - BUSIN	40.00	\$9,600.00
RMM	Max McKinley	CASE - CASE	0.80	\$192.00
RMM	Max McKinley	WFEE - WFEE	1.00	\$0.00
MG	Mary Gura	ASDIS - ASDIS	0.70	\$94.50
KAP	Kimberly A. Paulson	WFEE - WFEE	25.90	\$0.00
RMM RMM RMM MG	Max McKinley Max McKinley Max McKinley Mary Gura	BUSIN - BUSIN CASE - CASE WFEE - WFEE ASDIS - ASDIS	40.00 0.80 1.00 0.70	\$9,600.00 \$192.00 \$0.00 \$94.50

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#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
JR	Jeffrey Rizzo	ASDIS - ASDIS	19.00	\$2,565.00
JR	Jeffrey Rizzo	ASSET - ASSET	3.40	\$459.00
JR	Jeffrey Rizzo	BUSIN - BUSIN	37.50	\$5,062.50
JR	Jeffrey Rizzo	CASE - CASE	1.10	\$148.50
JR	Jeffrey Rizzo	CLAIM - CLAIM	0.40	\$54.00
JR	Jeffrey Rizzo	WFEE - WFEE	0.90	\$0.00
AS	Amanda Stephens	ASDIS - ASDIS	0.40	\$54.00
AS	Amanda Stephens	ASSET - ASSET	1.00	\$135.00
AS	Amanda Stephens	CASE - CASE	82.40	\$11,124.00
MML	Maya M. Lockwood	CASE - CASE	0.50	\$120.00
MML	Maya M. Lockwood	CLAIM - CLAIM	0.80	\$192.00
MML	Maya M. Lockwood	WFEE - WFEE	29.90	\$0.00
			425.30	\$78,603.50

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# EXHIBIT 7

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### Guerra King P.A.

5505 West Gray Street Tampa, FL 33609 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand Attention: Burton W. Wiand Wiand Guerra King, P.A. 5505 W. Gray Street Tampa, FL 33609

May 24, 2021 Client: 025305 Matter: 002223 Invoice #: 19511 Page: 1

RE: Brian Davison Legal Team - Recovery from Investors

For Professional Services Rendered Through March 31, 2021

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/8/2021	KCD	Begin drafting letter to those receiving false profits from EquiAlt investments (.6); begin drafting motion to approve pre-suit resolution of and bringing of investor clawback claims (1.2); communicate with Receiver regarding same (.5).	2.3	\$805.00
1/13/2021	KCD	Confer with Receiver regarding clawback motion and presuit letter (.3); revise same based on comments from J. Perez (.2); communicate with D. Zamorano regarding net winners (.2); communicate with A. Johnson, H. Fischer and A. Fels regarding 3.01(g) conference on clawback motion (.3).	1.0	\$350.00
1/13/2021	AS	Review spreadsheet of net winners and compare addresses to registrations in preparation for demand letters (.9).	0.9	\$121.50
1/13/2021	AS	Telephone call with K. Donlon regarding demand letters (.3).	0.3	\$40.50
1/14/2021	KCD	Communicate with A. Johnson, H. Fischer, A. Fels and Receiver regarding clawback motion (.4).	0.4	\$140.00
1/14/2021	AS	Receipt and review of additional exhibits for net winners (.3); review edits to pre-suit claim letter (.2).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/15/2021	KCD	Telephone call and emails with H. Fischer and A. Fels regarding clawback motion (.3); revise clawback motion (.2); telephone call and emails with D. Zamorano regarding net winners (.6).	1.1	\$385.00
1/15/2021	AS	Receipt and review of additional exhibits for net winners 12-20 (1.5).	1.5	\$202.50
1/19/2021	KCD	Communicate with H. Fischer, A. Johnson, A. Fels and Receiver regarding clawback motion (.3); revise clawback motion (.3).	0.6	\$210.00
1/20/2021	KCD	Revise motion to approve institution of clawback claims (.9); confer with Receiver regarding same (.4).	1.3	\$455.00
1/20/2021	AS	Review and revise net winner spreadsheet to add counties of residence (2.5).	2.5	\$337.50
1/22/2021	KCD	Communicate with Receiver regarding presuit letter to net winners (.5); revise letter to net winners (.5); confer with A. Stephens regarding letter to net winners (.4).	1.4	\$490.00
1/22/2021	AS	Communicate with K. Donlon and D. Zamorano regarding demand letters and prepare spreadsheet and draft mail merge (4.0).	4.0	\$540.00
1/23/2021	KCD	Confer with A. Stephens regarding letter to net winners (.3); review same (.6).	0.9	\$315.00
1/23/2021	AS	Prepare mail merge of draft demand letters to net winner investors (3.0); communicate with K. Donlon and Tampa Legal regarding same (.3).	3.3	\$445.50
1/23/2021	MG	Review settlement offer letter sent to investors who received false profits (.8).	0.8	\$108.00
1/24/2021	AS	Revise demand letters (2.5); communicate with Tampa Legal regarding same (.5).	3.0	\$405.00
1/25/2021	KCD	Communicate with A. Stephens regarding clawback letters (.4).	0.4	\$140.00
1/25/2021	AS	Prepare and assemble demand letters for mailing to net winners (11.0); communicate with K. Donlon, M. Gura and J. Rizzo regarding emails to net winners (1.0).	12.0	\$1,620.00
1/25/2021	JR	Communicate with legal team regarding clawback related mailout to investors and discuss processing same (.5).	0.5	\$67.50
1/25/2021	MG	Review net winner letters in preparation for emailing them to investors (2.3).	2.3	\$310.50
1/26/2021	KCD	Communicate with Receiver regarding clawback claims (.3); communicate regarding clawback with investor D.F. (.2); communicate regarding clawback with investor D & N Swenson (.3).	0.8	\$280.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/26/2021	AS	Prepare emails with demand letters to net winner investors (3.5); communicate with K. Donlon, J. Rizzo and M. Gura regarding same (.5); receipt and review of investor replies and inquiries and forward to K. Donlon (.5).	4.5	\$607.50
1/26/2021	JR	Prepare emails to clawback investors per communications with legal team (4.0); communicate with clawback investors regarding letter and clawback summary information (.2).	4.2	\$567.00
1/26/2021	MG	Continue review and compilation of the net winner letters in preparation for emailing them to investors (3.5).	3.5	\$472.50
1/27/2021	KCD	Communicate with Receiver regarding clawback claims (.2); communicate with investors regarding clawbacks: H.A. (.3), E.D. (.2), J.A. (.2), M.A.P. (.2), J.D. (.1); R & L G. (.4), N.P. (.3), J.C. (.2), R.B. (.3), D.L. (.3), R.S. (.3), T.J. (.2); begin drafting motion to approve non-investor clawback claims (.2).	3.4	\$1,190.00
1/27/2021	AS	Receipt and review of investor responses to demand letters, including phone calls and discuss and forward same to K. Donlon (1.0).	1.0	\$135.00
1/27/2021	JR	Review correspondence from clawback investor regarding receipt of clawback settlement letter (.1).	0.1	\$13.50
1/28/2021	KCD	Telephone calls with investors: J.H. (.1), E.K. (.2), G.W. (.2), M.B. (.2), G.P. (.1); review records received from investor T.G. (.2); communicate with D. Zamorano regarding information related to investors T.G., D.S., and R.B. (.4); review emails from investors: R.S. (.2), S.C. (.1); communicate with M. Hinchey regarding clawback letters (.1).	1.8	\$630.00
1/28/2021	RMM	Review correspondence from clawback settlement investor and confer with K. Donlon regarding the same (.5); create investor spreadsheet that includes contact information and notes for clawback settlement investors (.5); draft tolling agreement for clawback settlement investors (1.0).	2.0	\$480.00
1/29/2021	KCD	Telephone calls with investors: J.W. (.2), D.W. (.4), D.S. (.3), M.C. (.3), A.M. (.5), G.Q. (.2), T.G. (.3); review additional records from investor T.G. (.1); exchange emails with investors: B.C. (.1), B.B. (.1), D.S. (.1); review emails from L.G., T.K. and R.S. (.4); communicate with H. Fischer regarding tolling agreement (.2); exchange emails with D. Zamorano regarding investor P.L. (.2); revise tolling agreement (.2).	3.6	\$1,260.00
1/29/2021	RMM	Communicate with A. Stephens and K. Donlon regarding organizing and tracking communications with clawback settlement investors and revise spreadsheet (.4).	0.4	\$96.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/29/2021	AS	Receive and review investor responses regarding demand letters and communicate with K. Donlon regarding same (.4).	0.4	\$54.00
1/31/2021	KCD	Telephone call to investor M.Z. (.1); telephone call with J.B. (.2); telephone call with C.T. (.2); review email from investor J.O. (.1).	0.6	\$210.00
2/1/2021	KCD	Exchange emails with investors: L.C. (.2), J.O. (.1), D.L. (.1), L.W. (.1), E.S. (.2); prepare email to J.P. enclosing tolling agreement (.2); prepare email to M.P. enclosing tolling agreement (.2); exchange emails with H. Fischer regarding tolling agreement (.2).	1.3	\$455.00
2/1/2021	RMM	Communicate with clawback settlement investor and with A. Stephens regarding the same (.5); research related to Happy Retirement investments and communicate with K. Donlon regarding the same (.7).	1.2	\$288.00
2/1/2021	JR	Review correspondence from EquiAlt investors regarding clawback email and correspondence (.1).	0.1	\$13.50
2/1/2021	MML	Review correspondence from J. Perez regarding clawback procedure (.1).	0.1	\$24.00
2/2/2021	KCD	Draft revised Exhibit A for clawback investors who have investments with net losses as well (.3); communicate with Receiver regarding same (.1); communicate with D. Zamorano regarding additional net winners and gathering information on net losers (.2); send revised Exhibit A to investors T.G., M.C., E.K., M.B., G.W. and R.S. (.4); send tolling agreements to M.C., G.R., and D.C. (.3); calls with investors: A.G. (.1), D.C. (.2), K.H. (.1), R.S. (.2), A.M. (.2).	2.1	\$735.00
2/2/2021	AS	Receive and review settlement agreements and investor emails and communicate with K. Donlon regarding same (1.0).	1.0	\$135.00
2/2/2021	JR	Review correspondence from EquiAlt investors regarding clawback email and correspondence (.1).	0.1	\$13.50
2/3/2021	KCD	Telephone calls with investors: W.W. (.2), L. and R.G. (.8), T.J. (.1), S.W. (.2); telephone calls with counsel for: E.C. (.1), J.H. (.2), E.K. (.1), J.H. (.2), D.J. (.1); draft and send tolling agreements to T.J., D.S., R. and E.V., L. and P.G., J. and A.B., Y.S. (1.5); prepare email with revised exhibits to investors J.H., B. and C.B. (.1); exchange emails with counsel for L.R. (.1); prepare email to investor S.W. (.1); respond to investors returning Exhibit A (.2).	4.0	\$1,400.00
2/3/2021	AS	Prepare additional demand letters, revise master spreadsheet and communicate with K. Donlon via phone and email regarding same (4.5); prepare emails to four net winners (.7); email exchange and telephone call with D. Zamorano regarding demand letter (.2).	5.4	\$729.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
2/4/2021	KCD	Communicate with D. Zamorano regarding additional clawback spreadsheets (.4); prepare email to investor T.D. regarding clawback (.1); prepare email to investor N.P. (.1); calls with investors: L.C. (.2), T.D. (.2), S.H. (.1); telephone call with A. Holmsworth, counsel for investor V.O. (.2); return executed tolling agreement to investors M.P. and D.S. (.1); exchange emails with investor B.G. (.1); review latest settlement communication from H. Fischer (.3).	1.8	\$630.00
2/5/2021	AS	Receive and review net winner responses and settlement agreements (.6).	0.6	\$81.00
2/6/2021	KCD	Telephone call with investor E.S. (.2), research E.S. investments and revise Exhibit A (.2).	0.4	\$140.00
2/7/2021	KCD	Draft email to investor E.S. regarding investments (.2).	0.2	\$70.00
2/8/2021	KCD	Communicate with Receiver regarding investor L.R. (.1); telephone calls with investors J.H. (.2) and T.D. (.2); prepare email response to S. Shuker, counsel for investor L.R. (.2); prepare email response to W. Beall, counsel for J and A.B. (.1); prepare email responses enclosing tolling agreement to investors E.H. and L. and J.G. (.4); finalize email response to investor E.S. (.1); call with investor E.S. (.2); prepare email with tolling agreement to same (.2).	1.7	\$595.00
2/8/2021	AS	Review net winner communications and revise master spreadsheet and investor files (1.7).	1.7	\$229.50
2/9/2021	KCD	Continue drafting investor clawback complaint (3.2); call with investor A.S. (.2); prepare email with tolling agreement to investor A.S. (.1).	3.5	\$1,225.00
2/9/2021	AS	Receive and review net winner responses, settlement agreements and returned mail and forward to K. Donlon (.8); update net winner spreadsheet and investor files (1.1).	1.9	\$256.50
2/9/2021	JR	Review correspondence from clawback investors and related correspondence from A. Stephens (.1).	0.1	\$13.50
2/10/2021	KCD	Continue drafting investor clawback complaint (4.2); call with investor B.A. (.2).	4.4	\$1,540.00
2/10/2021	AS	Review net winner voicemails and forward to K. Donlon (.4); review net winner responses and update master spreadsheet (.9).	1.3	\$175.50

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			Client: Matter: Invoice #:	025305 002223 19511
			Page:	6
SERVICES				

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
2/11/2021	KCD	Prepare follow up emails to investors D.C., E.C., V. and R.O., E.K., R.V., E.S., J.P., G.R., M.C., D.F., T.J., D.W., G.L., and J.D. (.7); telephone calls with investors J.D., J.H., T.D., and T.J. (.4); call with S. Shuker regarding investor L.R. (.2); prepare email to same with tolling agreement (.1); call and send revised exhibit A to investors J.T. and R.W. (.2); call and send tolling agreement to J. Hall, counsel for investor P.B. (.3); continue drafting investor clawback complaint (.9); confer with Receiver regarding clawback claims against investors and agents (.5).	3.3	\$1,155.00
2/12/2021	KCD	Continue drafting investor clawback complaint (5.2); call with and prepare email to P. Varricchio, counsel for investor C.J., regarding tolling agreement (.3); call with and emails to D. Beitchman, counsel for investor S.T. (.7); call and exchange emails with J. Hall, counsel for investor P.B. (.3); call and emails with investor D.F. (.2); call with son of investor D.H. (.2); call with J. Guard, counsel for investor R.T. (.2); call with and prepare email to J. Laufer, counsel for investor M.D., regarding tolling agreement (.3).	7.4	\$2,590.00
2/12/2021	AS	Review net winner attorney emails, tolling agreements and Receiver's responses (.9); telephone call with investor regarding case updates and demand letter (.3); prepare redactions to clawback lawsuit exhibits and addition of page numbers (2.0); telephone call with D. Marrero regarding master spreadsheet and net winner exhibits (.1).	3.3	\$445.50
2/13/2021	AS	Revise exhibits to related litigation matters (1.0).	1.0	\$135.00
2/15/2021	KCD	Telephone call with investor M.C. (.1).	0.1	\$35.00
2/15/2021	AS	Review net winner responses and returned mail (.2); update master spreadsheet (.3).	0.5	\$67.50
2/16/2021	KCD	Confer with Receiver regarding clawback filing (.2).	0.2	\$70.00
2/16/2021	AS	Review net winner responses and update master spreadsheet (.6).	0.6	\$81.00
2/17/2021	KCD	Call with investor E.H. (.2).	0.2	\$70.00
2/17/2021	AS	Review net winner responses, including executed settlement and tolling agreements and update spreadsheet (.8); communicate with D. Marerro regarding mailing of tolling agreement (.2).	1.0	\$135.00
2/18/2021	KCD	Telephone calls with investor J.M.'s son (.2); call and emails with J. Hemme, counsel for investor R.C. (.2).	0.4	\$140.00
2/18/2021	AS	Review net winner responses and update master spreadsheet (.5); email exchange with K. Donlon (.2).	0.7	\$94.50
2/19/2021	KCD	Telephone call and emails with investor J.W. (.2); draft notice to Court regarding filing of clawback cases (.5).	0.7	\$245.00

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			invoice #.	19511
			Invoice #:	19511
			Matter:	002223
			Client:	025305
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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
2/19/2021	AS	Review net winner and K. Donlon emails and update master spreadsheet (.4).	0.4	\$54.00
2/22/2021	KCD	Telephone call with daughter of investor R.B. (.2); return call of C. Martin, attorney for investors S. and S.H. (.1).	0.3	\$105.00
2/22/2021	AS	Review net winner responses and update master spreadsheet (.3).	0.3	\$40.50
2/23/2021	KCD	Telephone call with R. Tauber, counsel for investor J.A. (.2).	0.2	\$70.00
2/24/2021	AS	Review net winner settlement agreements and update master spreadsheet (.2).	0.2	\$27.00
2/25/2021	KCD	Telephone call with investor J.H. (.2).	0.2	\$70.00
2/25/2021	AS	Review net winner responses and update master spreadsheet (.3).	0.3	\$40.50
2/26/2021	KCD	Communicate with B. Price, PDR, regarding investor question related to RMDs (.2); call with investor P.C. (.2); communicate with L. Stanley, counsel for investor W.F. regarding sales agent (.1).	0.5	\$175.00
2/26/2021	AS	Review net winner responses and update master spreadsheet (.2).	0.2	\$27.00
2/27/2021	KCD	Communicate with investor E.S. regarding other EquiAlt investments (.2).	0.2	\$70.00
3/1/2021	AS	Review net winner responses and communicate with K. Donlon regarding the same (.2); revise investor files and master spreadsheet (.5).	0.7	\$94.50
3/2/2021	AS	Review net winner responses and update master spreadsheet (.3).	0.3	\$40.50
3/3/2021	AS	Exchange emails with K. Donlon regarding additional net winners and review of same (.5).	0.5	\$67.50
3/5/2021	AS	Review additional net winner information and prepare email to K. Donlon regarding same (.2).	0.2	\$27.00
3/8/2021	KCD	Calls with investors D.B. (.2) and K.S. (.2).	0.4	\$140.00
3/8/2021	AS	Review net winner responses and returned mail and update master spreadsheet (.6).	0.6	\$81.00
3/11/2021	AS	Review investor voicemail and settlement agreement and forward to K. Donlon (.2); telephone call with K. Donlon regarding same (.1).	0.3	\$40.50
3/12/2021	KCD	Confer with Receiver regarding status (.5).	0.5	\$175.00
3/16/2021	AS	Review net winner responses and update master spreadsheet (.1); prepare email to K. Donlon regarding net winner voicemail (.1).	0.2	\$27.00

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			Page:	19511 8

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/23/2021	AS	Exchange emails with K. Donlon regarding net winner inquiry (.2).	0.2	\$27.00
3/24/2021	AS	Telephone call with M. Gura regarding net winners (.3); review net winner responses, cancellation of tolling agreement and returned mail (.5); update master spreadsheet (.2).	1.0	\$135.00
3/25/2021	AS	Prepare email to K. Donlon regarding additional net winners (.2).	0.2	\$27.00
3/26/2021	RMM	Review correspondence from T. Johnson regarding termination of the tolling agreement (.2).	0.2	\$48.00
3/26/2021	JR	Review correspondence from A. Stephens to K. Donlon regarding net winners (.1).	0.1	\$13.50
3/30/2021	/30/2021 AS Exchange emails with K. Donlon regarding net winners (.2); review investor voicemails and return calls to three investors (.9).		1.1	\$148.50
3/31/2021	AS	Review additional net winners and add to master spreadsheet in preparation for next mailing (3.1).	3.1	\$418.50
		Total: Asset Analysis and Recovery	132.00	\$29,753.50
		Total Professional Service	132.0	\$29,753.50
DISBURSI	EMENTS			
Date		Description of Disbursements		Amount
E112 (	Court Fees	6		
2/13/2021		American Express- Filing Fee- Complaint		\$402.00
		Total Disbursements		\$402.00
		Total Services Total Disbursements Total Current Charges	\$29,753.50 \$402.00	\$30,155.50
		PAY THIS AMOUNT		\$30,155.50

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#### TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	132.00	\$29,753.50	Court Fees	\$402.00
	132.00	\$29,753.50		\$402.00

#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
KCD	Katherine C. Donlon	ASSET - ASSET	53.60	\$18,760.00
RMM	Max McKinley	ASSET - ASSET	3.80	\$912.00
MG	Mary Gura	ASSET - ASSET	6.60	\$891.00
JR	Jeffrey Rizzo	ASSET - ASSET	5.20	\$702.00
AS	Amanda Stephens	ASSET - ASSET	62.70	\$8,464.50
MML	Maya M. Lockwood	ASSET - ASSET	0.10	\$24.00
			132.00	\$29,753.50

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## **EXHIBIT 8**

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### Guerra King P.A.

5505 West Gray Street Tampa, FL 33609 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand					
Attention: Burton W. Wiand					
Wiand Guerra King, P.A.					
5505 W. Gray Street					
Tampa, FL 33609					

May 24, 2021	
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Invoice #:	19487
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RE: Brian Davison Legal Team - Family Tree Estate Planning, LLC,

For Professional Services Rendered Through March 31, 2021

#### SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset /	Analysis and Recovery		
1/28/2021	KCD	Draft and revise motion for approval to file non-investor clawback claims (1.0).	1.0	\$350.00
2/11/2021	AS	Prepare redactions to customer names for sales agent clawback exhibits (.7).	0.7	\$94.50
2/12/2021	KCD	Draft clawback complaint against sales agents (1.2).	1.2	\$420.00
2/13/2021	KCD	Continue drafting clawback complaint (5.9); confer with Receiver regarding revisions (.8).	6.7	\$2,345.00
		Total: Asset Analysis and Recovery	9.60	\$3,209.50
		Total Professional Service	9.6	\$3,209.50
DISBURS	EMENTS			
Date		Description of Disbursements		Amount
E112	Court Fees			
2/13/2021		American Express- Filing Fee- Complaint		\$402.00

**Total Disbursements** 

\$402.00

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			Page:	2
	Total Services		\$3,209.50	
	Total Disbursements		\$402.00	
	Total Current Charge	es		\$3,611.50
	PAY THIS AMOUNT			\$3,611.50

#### TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	9.60	\$3,209.50	Court Fees	\$402.00
	9.60	\$3,209.50		\$402.00

#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
KCD	Katherine C. Donlon	ASSET - ASSET	8.90	\$3,115.00
AS	Amanda Stephens	ASSET - ASSET	0.70	\$94.50
			9.60	\$3,209.50

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## EXHIBIT 9





Invoice # 4329 Date: 05/13/2021

### Johnson, Cassidy, Newlon & DeCort, P.A.

2802 N. Howard Ave Tampa, FL 33607

Burton Webb Wiand 114 Turner Street Clearwater, Florida 33756

#### Wiand-00001-SEC v. Brian Davison, et al.

#### SEC v. Davison (ASSET - Asset Analysis and Recovery)

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	03/15/2021	Call with A. Johnson regarding Davison settlement negotiations (.3); emails with Receiver regarding domains held by EquiAlt (.2); telephone call with R. Stines regarding access to emails by B. Davison (.2); review SEC's responses to B. Rybicki's Request for Admissions (.2); review domain list received from H. Fischer (.2); reviewed Receiver's revisions to B. Davison Judgment (.2).	KD	1.30	\$350.00	\$455.00
Service	03/16/2021	Emails with A. Johnson and J. Southron, counsel for T. Kelly, regarding T. Kelly's deposition (.2); emails with Receiver regarding domains (.3); emails with A. Johnson regarding B. Davison settlement details (.3); telephone call with H. Fisher regarding settlement details (.3); draft Notice of Filing Motion to Stay in California state court (.2); receipt and initial review of B. Davison Merrill Lynch statement (.2); emails with M. Mincberg regarding Shore House investment (.2); review Fourth Quarterly update regarding same (.2).	KD	1.90	\$350.00	\$665.00
Service	03/17/2021	Review and revise Judgment (.5); emails with A. Johnson regarding settlement (.2); emails with counsel regarding T. Kelly deposition (.1); emails with M. Hinchey regarding Sterling Group (.2); emails with Receiver and A. Johnson regarding revisions to Judgment (.3).	KD	1.30	\$350.00	\$455.00

Invoice # 4329 - 05/13/2021

Service03/18/2021Confer with Receiver regarding coils and r. Kelly deposition (.3) emails with estate valuation (.1).KD0.40\$350.00\$140.00Service03/19/2021Emails with H. Fischer regarding domains updgment order in Volcan matter (.2); confer with Receiver regarding Rock Brothers capital call and coins (.2); conference call with H. Fischer radio Receiver regarding Rock Brothers, coins and domains (.5); confer with M. McKinley regarding Volcan order and authorizations for Rybick family members (.3); emails with A. Johnson regarding Davison settlement (.2); review and research items; telephone call with A. Johnson regarding Back Rock Brothers (.2); emails with A. Johnson regarding Davison settlement (.2); review and research items; Receiver regarding outstanding issue (.6); emails with M. Johnson regarding Davison settlement (.2); review and research items; Receiver regarding motion to Star (2); can with the Receiver regarding Motion to Star (2); can with the Receiver regarding production to B. Davison and B. Rybick (12); crevies Can and Receiver regarding Pavison settlement (.2); follow-up with H. Starte regarding Rock Brothers (.2); emails with A. Johnson regarding B. Rybick (.2); review und research items; follow-up with H. Fischer regarding Rock Brothers (.2); emails with A. Johnson regarding B. Rybick (.2); review und research items; follow-up with H. Fischer regarding Rock Brothers regarding Rock Brothers regarding Motion to Star (2); endities (.2); review und research items; follow-up with H. Fischer regarding Rock Brothers (.2); star (.2); confer with Receiver regarding Rock Brothers (.2); regarding Call Babini (.2); confer with Receiver regarding Rock Brothers (.2); review BCS Answers to B. Rybick (.2); review BCS Answers to B. Rybick (.2); revie							
(2): review and revise proposed summary judgment order in Volcan matter (2): conference call with Receiver regarding Rock Brothers capital call and coins (2): conference call with H. Fischer regarding Volcan order and Authorizations for RybickI family members (.3): emails with A. Johnson (2).KD2.00\$350.00\$700.00Service03/22/2021Emails with A. Johnson regarding Davison settlement (.2): review and research items identified by B. Davison for settlement (.7): telephone call with H. Fischer regarding Davison settlement (.2): call with the Receiver regarding Davison settlement (.2): review and research items identified by B. Davison for settlement (.2): review and research items identified by B. Davison for settlement (.2): review and research items identified by B. Davison for settlement (.2): review and research items identified by B. Davison for settlement (.2): review and research items identified by B. Davison for settlement (.2): review and research items identified by B. Davison for settlement (.2): review and research items areview regarding Davison settlement (.2): review and research items to any box on the Stay (.2): memis with M. McKniley regarding B. Rybicki Citi accounts (.1).KD0.70\$350.00\$245.00Service03/23/2021Telephone call with A. Johnson regarding pavison settlement (.2): revise Citi authorizations (.2).KD0.70\$350.00\$385.00Service03/24/2021Conference call with A. Johnson and Receiver regarding Paduction (.1): review SCCS Answers to B. Rybicki's Interrogarding Back''s Rybick' Brothers (.2): revise Citi authorizations (.2):KD0.50\$350.00\$175.00Service03/24/2021Confer with R	Service	03/18/2021	T. Kelly deposition (.3); emails with Receiver and G. Burns regarding real	KD	0.40	\$350.00	\$140.00
settlement (2): review and research items identified by B. Davison for settlement (.7); telephone call with H. Fischer regarding Davison settlement (.3); call with the Receiver regarding outstanding issues (.5); draft Notice of Filing Motion to Stay (.2); emails with M. McKinley regarding B. Rybicki Citi accounts (.1).KD0.70\$350.00\$245.00Service03/23/2021Telephone call with A. Johnson regarding Davison settlement (.2); follow-up with H. Fischer regarding Merrill Lynch statement (.1); confer with R. Stines and Receiver regarding production to B. Davison and B. Rybicki (.2); revise Citi authorizations (.2).KD0.70\$350.00\$245.00Service03/24/2021Conference call with A. Johnson and Receiver regarding Davison settlement (.3); follow-up with H. Fischer regarding Rock Brothers (.1); confer with Receiver and T. Kelly regarding Davison settlement (.3); follow-up with H. Fischer regarding Rock Brothers (.1); confer with Receiver and T. Kelly regarding Cal Babbini (.2); confer with Receiver regarding enall production to Citi (.3); confer with Receiver regarding call production to Citi (.3); confer with Receiver regarding call production to Citi (.3); confer with Receiver regarding sales agents and contact information (.3); review agents and contact information (.3); review related to Law Firm Defendants' Motion to Cassidy (.1); finalize and file Notice of Filing related to Law Firm Defendants' Motion to Compel (.1).KD0.10\$350.00\$350.00	Service	03/19/2021	(.2); review and revise proposed summary judgment order in Volcan matter (.2); confer with Receiver regarding Rock Brothers capital call and coins (.2); conference call with H. Fischer and Receiver regarding Rock Brothers, coins and domains (.5); confer with M. McKinley regarding Volcan order and authorizations for Rybicki family	KD	1.60	\$350.00	\$560.00
Davison settlement (.2); follow-up with H. Fischer regarding Merrill Lynch statement (.1); confer with R. Stines and Receiver regarding production to B. Davison and B. Rybicki (.2); revise Citi authorizations (.2).KD1.10\$350.00\$385.00Service03/24/2021Conference call with A. Johnson and Receiver regarding Davison settlement (.3); follow-up with H. Fischer regarding Rock Brothers (.1); confer with Receiver and T. Kelly regarding Call Babbini (.2); confer with Receiver regarding demit production (.1); review SEC's Answers to B. Rybicki's Interrogatories (.2); review Judgment received from A. Johnson (.2).KD0.50\$350.00\$175.00Service03/25/2021Revise revised Rybicki authorization to Citi (.3); confer with Receiver regarding ediscovery to Davison and Rybicki (.2)KD0.50\$350.00\$175.00Service03/26/2021Confer with G. Burns regarding sales agents and contact information (.3); review order granting motion to retain Johnson Cassidy (.1); finalize and file Notice of Filing related to Law Firm Defendants' Motion to Compel (.1).KD0.10\$350.00\$350.00Service03/29/2021Email to A. Soto regarding Citi authorizations for Rybicki family membersKD0.10\$350.00\$350.00	Service	03/22/2021	settlement (.2); review and research items identified by B. Davison for settlement (.7); telephone call with H. Fischer regarding Davison settlement (.3); call with the Receiver regarding outstanding issues (.5); draft Notice of Filing Motion to Stay (.2); emails with M. McKinley regarding B.	KD	2.00	\$350.00	\$700.00
Receiver regarding Davison settlement (.3); follow-up with H. Fischer regarding Rock Brothers (.1); confer with Receiver and T. Kelly regarding Cal Babbini (.2); confer with Receiver regarding email production (.1); review SEC's Answers to B. Rybicki's Interrogatories (.2); review Judgment received from A. Johnson (.2).KD0.50\$350.00\$175.00Service03/25/2021Revise revised Rybicki authorization to Citi (.3); confer with Receiver regarding ediscovery to Davison and Rybicki (.2)KD0.50\$350.00\$175.00Service03/26/2021Confer with G. Burns regarding sales agents and contact information (.3); review order granting motion to retain Johnson Cassidy (.1); finalize and file Notice of Filing related to Law Firm Defendants' Motion to Compel (.1).KD0.10\$350.00\$35.00	Service	03/23/2021	Davison settlement (.2); follow-up with H. Fischer regarding Merrill Lynch statement (.1); confer with R. Stines and Receiver regarding production to B. Davison and B.	KD	0.70	\$350.00	\$245.00
(.3); confer with Receiver regarding ediscovery to Davison and Rybicki (.2)Service03/26/2021Confer with G. Burns regarding sales agents and contact information (.3); review order granting motion to retain Johnson Cassidy (.1); finalize and file Notice of Filing related to Law Firm Defendants' Motion to Compel (.1).KD0.50\$350.00\$175.00Service03/29/2021Email to A. Soto regarding Citi authorizations for Rybicki family membersKD0.10\$350.00\$35.00	Service	03/24/2021	Receiver regarding Davison settlement (.3); follow-up with H. Fischer regarding Rock Brothers (.1); confer with Receiver and T. Kelly regarding Cal Babbini (.2); confer with Receiver regarding email production (.1); review SEC's Answers to B. Rybicki's Interrogatories (.2); review Judgment	KD	1.10	\$350.00	\$385.00
agents and contact information (.3); review order granting motion to retain Johnson Cassidy (.1); finalize and file Notice of Filing related to Law Firm Defendants' Motion to Compel (.1).KD0.10\$350.00\$35.00	Service	03/25/2021	(.3); confer with Receiver regarding	KD	0.50	\$350.00	\$175.00
authorizations for Rybicki family members	Service	03/26/2021	agents and contact information (.3); review order granting motion to retain Johnson Cassidy (.1); finalize and file Notice of Filing related to Law Firm Defendants' Motion to	KD	0.50	\$350.00	\$175.00
	Service	03/29/2021	authorizations for Rybicki family members	KD	0.10	\$350.00	\$35.00

Invoice # 4329 - 05/13/2021

Service	03/31/2021	Follow up with counsel reg of Tony Kelly (.2).	arding deposition KD	0.20	\$350.00	\$70.00
	Time K	eeper	Quantity	Rate	·	Total
Katherine	Donlon		11.6	\$350	.00	\$4,060.00
				Subto	otal	\$4,060.00
				Тс	otal	\$4,060.00

#### **Detailed Statement of Account**

#### **Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
4329	05/13/2021	\$4,060.00	\$0.00	\$4,060.00
			Outstanding Balance	\$4,060.00
			Total Amount Outstanding	\$4,060.00

Please make all amounts payable to: Johnson, Cassidy, Newlon & DeCort, P.A.

Payment is due upon receipt.





Invoice # 4422 Date: 05/13/2021

## Johnson, Cassidy, Newlon & DeCort, P.A.

2802 N. Howard Ave Tampa, FL 33607

Burton Webb Wiand 114 Turner Street Clearwater, Florida 33756

#### Wiand-00006-SEC v. B. Davison (ASDIS - Asset Disposition)

#### SEC v. B. Davison (ASDIS - Asset Disposition)

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	03/16/2021	Confer with Receiver and C. Parker regarding motion to expand receivership as to certain properties (.3); communicate with M. McKinley regarding proposed order for same (.1); revise motion to expand (.2); communicate with opposing counsel for 3.01 conference regarding motion to expand (.1).	KD	0.70	\$350.00	\$245.00
Service	03/22/2021	Review Motion to Expand Receivership (.2); confer with M. McKinley regarding same (.2).	KD	0.40	\$350.00	\$140.00
Service	03/23/2021	Revise Motion to Expand Receivership (.2).	KD	0.20	\$350.00	\$70.00
Service	03/25/2021	Review and revise motion to expand receivership and proposed orders (.4); confer with M. McKinley regarding same (.1).	KD	0.50	\$350.00	\$175.00
Service	03/26/2021	Confer with M. McKinley regarding revisions to motion to expand receivership (.2); revise, finalize and file motion to expand receivership (.6); emails with counsel regarding 3.01 conference regarding motion to expand receivership (.2); email to C. Parker regarding proposed order on same (1).	KD	1.10	\$350.00	\$385.00
Service	03/31/2021	Communicate with the Tampa Times regarding the Notice of Sale for 3914 N. Ridge Avenue (.4).	MG	0.40	\$135.00	\$54.00

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Invoice # 4422 - 05/13/2021

Service	03/31/2021	Review motion to approve sale of 3914 N. Ridge Avenue (.2); confer with M. McKinley regarding same (.2); confer with counsel regarding 3.01 conference on same (.1);	KD	0.70	\$350.00	\$245.00
		review order granting Motion to Expand Receivership (.2).				

Time Keeper	Quantity	Rate	Total
Katherine Donlon	3.6	\$350.00	\$1,260.00
Mary Gura	0.4	\$135.00	\$54.00
		Subtotal	\$1,314.00
		Total	\$1,314.00

#### **Detailed Statement of Account**

#### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
4422	05/13/2021	\$1,314.00	\$0.00	\$1,314.00
			Outstanding Balance	\$1,314.00
			Total Amount Outstanding	\$1,314.00

Please make all amounts payable to: Johnson, Cassidy, Newlon & DeCort, P.A.

Payment is due upon receipt.

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# **EXHIBIT 10**





Invoice # 4423 Date: 05/13/2021

## Johnson, Cassidy, Newlon & DeCort, P.A.

2802 N. Howard Ave Tampa, FL 33607

Burton Webb Wiand 114 Turner Street Clearwater, Florida 33756

#### Wiand-00002-Recovery from Investors

#### **Recovery from Investors**

#### Services

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	03/22/2021	Work on Waiver of Service letters to defendants.	KD	0.60	\$350.00	\$210.00
Service	03/22/2021	Communicate with K. Donlon regarding the waiver packets to the net winners (.8).	MG	0.80	\$135.00	\$108.00
Service	03/23/2021	Revise letter to defendants regarding Waiver of Service of Summons (.2); confer with M. Gura regarding waiver mailing to defendants (.3); telephone call and emails with R. Bohrer (.3); emails with D. Zamorano regarding R. Bohrer (.2)	KD	1.00	\$350.00	\$350.00
Service	03/23/2021	Review and compare the net winners spreadsheet for the most recent information in preparation for mailing the waiver packets (4.2).	MG	4.20	\$135.00	\$567.00
Service	03/23/2021	Revise Citi authorizations (.2).	KD	0.20	\$350.00	\$70.00
Service	03/24/2021	Draft and revise the waiver packets for the net winners (5.2).	MG	5.20	\$135.00	\$702.00
Service	03/25/2021	Continued to draft and revise the waiver packets for the net winners (8.5).	MG	8.50	\$135.00	\$1,147.50
Service	03/25/2021	Review mail merge of waiver of service of process communications.	KD	0.20	\$350.00	\$70.00
Service	03/26/2021	Work with M. Gura on service of Waiver of	KD	0.90	\$350.00	\$315.00

Invoice # 4423 - 05/13/2021

		loi same ().				
Service	03/31/2021	Review E-Hounds records regarding backup information for investor defendant J. Flynn (.6); emails with D. Victor, counsel for same (.2).	KD	0.80	\$350.00	\$280.00
Service	03/30/2021	Telephone calls with investor defendants D. Friedman (.2), J. Borman (.2), R. Tauber, counsel for J. Andreisen (.2), B. J. Heineck for investor R. Bell (.4), S. Clar, counsel for K. Nowack (.2), G. Lau, potential counsel for investors (.2) regarding waiver of service packet received.	KD	1.40	\$350.00	\$490.00
Service	03/29/2021	Telephone call and emails with investor defendants N. Kidd (.2) and S. Cable (.5); confer with Receiver regarding same (.2); emails with D. Zamarano regarding S. Cable (.2).	KD	1.10	\$350.00	\$385.00
Service	03/26/2021	Final review and compilation of the waiver packets for net winners (7.5).	MG	7.50	\$135.00	\$1,012.50
		Service of Process (.9).				

#### Expenses

Туре	Date	Description	Quantity	Rate	Total
Expense	03/24/2021	Photocopy charge for net winner waiver packets.	1.00	\$4,603.33	\$4,603.33
Expense	03/25/2021	Accurint Searches for new contact information for packets returned undeliverable from the January mailout.	1.00	\$341.85	\$341.85
Expense	03/26/2021	Postal charge for mailing net winner waiver packets.	1.00	\$1,680.20	\$1,680.20
Expense	03/26/2021	Additional Accurint Searches for new contact information for packets returned undeliverable from the January mailout.	1.00	\$17.31	\$17.31

Expenses Subtotal \$6,642.69

Time Keeper	Quantity	Rate	Total
Katherine Donlon	6.2	\$350.00	\$2,170.00
Mary Gura	26.2	\$135.00	\$3,537.00
		Subtotal	\$12,349.69
		Total	\$12,349.69

#### **Detailed Statement of Account**

#### **Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
4423	05/13/2021	\$12,349.69	\$0.00	\$12,349.69
			Outstanding Balance	\$12,349.69
			Total Amount Outstanding	\$12,349.69

Please make all amounts payable to: Johnson, Cassidy, Newlon & DeCort, P.A.

Payment is due upon receipt.

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## **EXHIBIT 11**





Invoice # 4328 Date: 05/13/2021

## Johnson, Cassidy, Newlon & DeCort, P.A.

2802 N. Howard Ave Tampa, FL 33607

Burton Webb Wiand 114 Turner Street Clearwater, Florida 33756

#### Wiand-00003-Family Tree Estate Planning, LLC, et al.

## Family Tree Estate Planning, LLC, et al. (ASSET - Asset Analysis and Recovery)

#### Services

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	03/29/2021	Collate, process and review the waiver of service of process packets (8.5).	MG	8.50	\$135.00	\$1,147.50
Service	03/29/2021	Review waiver of service of process packets to be mailed to defendants (.3).	KD	0.30	\$350.00	\$105.00
			S	ervices Sub	total	\$1,252.50

#### **Expenses**

Туре	Date	Description	Quantity	Rate	Total
Expense	03/29/2021	Postal charge for mailing waiver packets.	1.00	\$111.00	\$111.00
Expense	03/29/2021	Photocopy charge for waiver packets.	1.00	\$476.92	\$476.92
			Expenses Subtotal		\$587.92

Time Keeper	Quantity	Rate	Total
Katherine Donlon	0.3	\$350.00	\$105.00
Mary Gura	8.5	\$135.00	\$1,147.50
		Subtotal	\$1,840.42

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Invoice # 4328 - 05/13/2021

Total \$1,840.42

# **Detailed Statement of Account**

#### **Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
4328	05/13/2021	\$1,840.42	\$0.00	\$1,840.42
			Outstanding Balance	\$1,840.42
			Total Amount Outstanding	\$1,840.42

Please make all amounts payable to: Johnson, Cassidy, Newlon & DeCort, P.A.

Payment is due upon receipt.

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# **EXHIBIT 12**



FINANCIAL INVESTIGATIONS

#### INVOICE SUMMARY OF PROFESSIONALS

Burton Wiand, Receiver Equialt et al. 5505 West Gray Street Tampa, FL 33609 Invoice Number: 30540 Date: April 13, 2021 Matter ID: 127.0004

#### Re: EquiAlt

For Professional Services Rendered January 1, 2021 to January 31, 2021.

Professional	Initials	Position	Experience	Hours	Rate	Fees
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Partner	27 Years	1.8	\$ 495.00	\$ 891.00
Kerry-Ann Rin, CPA, CIRA*	KMR	Partner	15 Years	44.1	245.00	10,804.50
Christopher M. Cropley, CPA	CMC	Director	12 Years	55.5	300.00	16,650.00
Danny D. Zamorano, CPA	DDZ	Manager	5 Years	245.2	245.00	60,074.00
Pamela Chuy	PC	Associate	10 Years	12.2	195.00	2,379.00
Renee Johnson	RJ	Associate	9 Year	106.4	195.00	20,748.00
Blended Average Hourly Rate:					\$239.78	
Total Fees:				465.2		\$ 111,546.50

\* Due to time constraints, Ms. Rin assisted Mr. Zamorano in order to meet deadlines. Her time is being billed at Mr. Zamorano's rate.



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE DETAIL

Burton Wiand, Receiver Equialt et al. 5505 West Gray Street Tampa, FL 33609 Invoice Number: 30540 Date: April 13, 2021 Matter ID: 127.0004

Re: Equialt, et al.

For Professional Services Rendered January 1, 2021 to January 31, 2021.

Date	Initials	Description	Hours	Rate	 Amount
01/01/2021	СМС	Continued to review and analyze investor transactions related to IRA account trustees (e.g.; Provident Trust, Goldstar, IRA services, etc.).	11.9	\$300	\$ 3,570.00
01/01/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.8	\$245	\$ 2,156.00
01/02/2021	CMC	Continued to review and analyze investor transactions related to IRA account trustees (e.g.; Provident Trust, Goldstar, IRA services, etc.).	9.5	\$300	\$ 2,850.00
01/02/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	10.6	\$245	\$ 2,597.00
01/03/2021	CMC	Continued to review and analyze investor transactions related to IRA account trustees (e.g.; Provident Trust, Goldstar, IRA services, etc.).	9.1	\$300	\$ 2,730.00
01/03/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	9.2	\$245	\$ 2,254.00
01/04/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	9.8	\$245	\$ 2,401.00



Date	Initials	Description	Hours	Rate	 Amount
01/04/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	11.4	\$195	\$ 2,223.00
01/05/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	10.9	\$245	\$ 2,670.50
01/05/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	11.2	\$195	\$ 2,184.00
01/06/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	10.8	\$245	\$ 2,646.00
01/06/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	10.6	\$195	\$ 2,067.00
01/07/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity. ( <b>Actual = 12.8</b> ).	12.0	\$245	\$ 2,940.00
01/07/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	11.1	\$195	\$ 2,164.50



Date	Initials	Description	Hours	Rate	 Amount
01/08/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity. (Actual = 14.6).	12.0	\$245	\$ 2,940.00
01/08/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	11.9	\$195	\$ 2,320.50
01/09/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity. (Actual = 13.4).	12.0	\$245	\$ 2,940.00
01/10/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity. (Actual = 15.7).	12.0	\$245	\$ 2,940.00
01/11/2021	MMY	Discussion with DDZ re: investor schedules.	0.4	\$495	\$ 198.00
01/11/2021	DDZ	Discussion with MMY re: investor schedules (.4); review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (14.2). (Actual = 14.6).	12.0	\$245	\$ 2,940.00
01/11/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.4	\$195	\$ 1,638.00
01/12/2021	MMY	Discussions with DDZ and KMR re: investor analysis.	0.4	\$495	\$ 198.00
01/12/2021	KMR	Discussions with MMY and DDZ re: investor analysis (.4); preparation of detailed schedules of net winner investments (13.8). (Actual = 14.2).	12.0	\$245	\$ 2,940.00



Date	Initials	Description	Hours	Rate	Rate Amo	
01/12/2021	CMC	Preparation of detailed schedules of net winner investments.	6.4	\$300	\$	1,920.00
01/12/2021	DDZ	Discussions with MMY and KMR re: investor analysis (.4); preparation of detailed schedules of net winner investments (16.2). (Actual = 16.6).	12.0	\$245	\$	2,940.00
01/12/2021	RJ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	10.2	\$195	\$	1,989.00
01/13/2021	MMY	Several discussions with DDZ re: investor analysis.	0.4	\$495	\$	198.00
01/13/2021	KMR	Preparation of detailed schedules of net winner investments. (Actual = 16.3).	12.0	\$245	\$	2,940.00
01/13/2021	CMC	Preparation of detailed schedules of net winner investments. (Actual = 12.3).	12.0	\$300	\$	3,600.00
01/13/2021	DDZ	Discussions with MMY re: investor analysis (.4); preparation of detailed schedules of net winner investments (15.3). (Actual = 15.7).	12.0	\$245	\$	2,940.00
01/13/2021	RJ	Preparation of detailed schedules of net winner investments. (Actual = 12.1).	12.0	\$195	\$	2,340.00
01/13/2021	PC	Assisted with preparation of investor analysis, including compilation of investor transactions for investments made in Fund III.	5.4	\$195	\$	1,053.00
01/14/2021	KMR	Preparation of detailed schedules of net winner investments. (Actual = 14.8).	12.0	\$245	\$	2,940.00
01/14/2021	CMC	Preparation of detailed schedules of net winner investments.	6.6	\$300	\$	1,980.00
01/14/2021	DDZ	Preparation of detailed schedules of net winner investments. (Actual = 16.2).	12.0	\$245	\$	2,940.00
01/14/2021	RJ	Preparation of detailed schedules of net winner investments.	11.3	\$195	\$	2,203.50
01/14/2021	PC	Assisted with preparation of investor analysis, including compilation of investor transactions for investments made in Fund III.	6.8	\$195	\$	1,326.00
01/15/2021	KMR	Preparation of detailed schedules of net winner investments.	8.1	\$245	\$	1,984.50
01/15/2021	DDZ	Preparation of detailed schedules of net winner investments.	11.5	\$245	\$	2,817.50
01/15/2021	RJ	Preparation of detailed schedules of net winner investments.	8.3	\$195	\$	1,618.50
01/19/2021	DDZ	Preparation of schedule of investors brought in by Todd Elliot.	0.9	\$245	\$	220.50



Date	Initials	Description	Hours	Rate	 Amount
01/20/2021	DDZ	Updated analyses of payments to/for the benefit of Brian D. Davison and Barry M. Rybicki.	5.3	\$245	\$ 1,298.50
01/21/2021	DDZ	Continued to update analyses of payments to/for the benefit of Brian D. Davison and Barry M. Rybicki (3.2); review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (3.4).	6.6	\$245	\$ 1,617.00
01/22/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (6.3); continued to update analyses of payments to/for the benefit of Brian D. Davison and Barry M. Rybicki (1.0).	7.3	\$245	\$ 1,788.50
01/25/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	4.8	\$245	\$ 1,176.00
01/26/2021	DDZ	Review of investor transactions identified by RJ requiring further analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (4.2); assisted with preparation of affidavit re: commissions paid to A. Sears (1.3); updated schedule of payments to A. Sears (1.1); gathered supporting documentation for payments to investor (D. Swanson) (.9).	7.5	\$245	\$ 1,837.50
01/27/2021	MMY	Discussion with DDZ re: declaration and exhibits.	0.2	\$495	\$ 99.00
01/27/2021	DDZ	Discussion with MMY re: declaration and exhibits (.2); assisted with preparation of affidavit re: payments to A. Sears (3.5); conference call with A. Johnson and K. Donlon re: Affidavits and supporting schedules (.5); continued to update schedule of payments to A. Sears (.7); continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (3.6).	8.5	\$245	\$ 2,082.50
01/28/2021	MMY	Preparation of affidavit and review of exhibits and discussions with DDZ re: same.	0.3	\$495	\$ 148.50



Date	Initials	Description	Hours Rate		Amount	
01/28/2021	DDZ	Preparation of schedule of payments to C. Babbini (1.1); updated schedule of payments to D. Tenhulzen (.7); assisted with preparation of affidavit (1.2); continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (7.2).	10.2	\$245	\$	2,499.00
01/29/2021	MMY	Review and execution of affidavit and exhibits.	0.1	\$495	\$	49.50
01/29/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	11.5	\$245	\$	2,817.50
01/30/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	3.0	\$245	\$	735.00
01/31/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity. (Actual = 13.5).	estment terms, n investor files, by Equialt		\$	2,940.00
		Total Fees	465.2		\$	111,546.50
		Total Amount Due			\$	111,546.50



Date	Initials	Description	Hours	Rate	Amount
Please remit	payment	by mail to:			
		Yip Associates			
		2 South Biscayne Blvd., Suite 2690			
		Miami, FL 33131			
Or, via wire	transfer t	io:			
		IBERIA BANK			
		200 W Congress Street			
		Lafayette, LA 70501			
ABA Numbe	er:	265270413			
		IBERIABANK Credit Account Information			
IB Customer	Name:	YIPCPA, LLC d/b/a YIP ASSOCIATES			
IB Account 1	Number:	4400000149			
Amount of <b>V</b>	Wire:	\$111,546.50			
For Credit t	0:	Yip Associates			
		2 South Biscayne Blvd., Suite 2690			
		Miami, FL 33131			



FINANCIAL INVESTIGATIONS

#### **INVOICE SUMMARY OF PROFESSIONALS**

Burton Wiand, Receiver Equialt et al. 5505 West Gray Street Tampa, FL 33609 Invoice Number: 30546 Date: April 13, 2021 Matter ID: 127.0004

#### Re: EquiAlt

For Professional Services Rendered February 1, 2021 to February 28, 2021.

Professional	Initials	Position	Experience	Hours	Rate	Fees
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Partner	27 Years	3.4	\$ 495.00	\$ 1,683.00
Hal A. Levenberg, CIRA, CFE (No Charge)	HAL	Director	13 Years	1.4	300.00	-
Christopher M. Cropley, CPA	CMC	Director	12 Years	4.9	300.00	1,470.00
Danny D. Zamorano, CPA	DDZ	Manager	5 Years	136.9	245.00	33,540.50
Blended Average Hourly Rate:					\$250.30	
Total Fees:				146.6		\$ 36,693.50



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

	INVOICE DETAIL	
Burton Wiand, Receiver	Invoice Number:	30546
Equialt et al.	Date:	April 13, 2021
5505 West Gray Street Tampa, FL 33609	Matter ID:	127.0004

Re: Equialt, et al.

For Professional Services Rendered February 1, 2021 to February 28, 2021.

Date	Initials	Description	Hours	Hours Rate		Amount	
02/01/2021	MMY	Discussions with DDZ and CMC re: Employer Sponsored Plans.	0.3	\$495	\$	148.50	
02/01/2021	СМС	Reviewed various investor documents to determine whether any investors invested utilizing an Employer Sponsored Plan (.4); discussion with MMY and DDZ re: same (.3).	0.7	\$300	\$	210.00	
02/01/2021	DDZ	Reviewed investor information and investment history to identify any investments made through Employer Sponsored Plans (.5); discussion with MMY and CMC re: same (.3); continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (9.8).	10.6	\$245	\$	2,597.00	
02/02/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.2	\$245	\$	2,009.00	
02/03/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (4.6); prepared summaries for select net loser investments (2.4); reviewed analyses performed in response to inquiries from Receiver's counsel (1.3).	8.3	\$245	\$	2,033.50	
02/04/2021	MMY	Telephone conversation with B. Wiand re: losses.	0.2	\$495	\$	99.00	
02/04/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity (7.1); conference call with K. Donlon re: net winner investment (.3); prepared schedules re: same (.4).	7.8	\$245	\$	1,911.00	
02/05/2021	MMY	Discussion with DDZ re: analysis of losses from 2011 through 2019.	0.2	\$495	\$	99.00	



Date	Initials	Description	Hours	Rate	 Amount
02/05/2021	DDZ	Discussion with MMY re: analysis of losses from 2011 through 2019 (.2); preparation of analysis of financial results (2011 through 2019) for Fund I, Fund II, Fund III and EA SIP (8.3).	8.5	\$245	\$ 2,082.50
02/07/2021	DDZ	Continued preparation of analysis of financial results (2011 through 2019) for Fund I, Fund II, Fund III and EA SIP.	2.8	\$245	\$ 686.00
02/08/2021	MMY	Discussion with DDZ including review of analyses regarding losses (.6); conference call with Receiver, K. Donlon and DDZ re: losses suffered by Funds (.6).	1.2	\$495	\$ 594.00
02/08/2021	DDZ	Preparation of analysis of aggregate financial results of the Equialt Funds (11.9); discussion with MMY re: same (.6); conference call with B. Wiand, K. Donlon and MMY re: losses suffered by Funds (.6). (Actual = 13.1).	12.0	\$245	\$ 2,940.00
02/09/2021	CMC	Discussion with DDZ re: analysis of aggregate financial results of the Equialt Funds.	1.1	\$300	\$ 330.00
02/09/2021	DDZ	Discussion with CMC re: analysis of aggregate financial results of the Equialt Funds; (1.1); continued preparation of analysis of aggregate financial results for the Equialt Funds (10.3); preparation of schedules of payments to sales agents (1.5). (Actual = 12.9).	12.0	\$245	\$ 2,940.00
02/10/2021	MMY	Review of schedules (.6); discussion with DDZ including review of schedules of losses (.7).	1.3	\$495	\$ 643.50
02/10/2021	DDZ	Finalized analysis of aggregate financial results of the Equialt Funds (9.9); discussion with MMY re: same (.7); finalized schedules of payments to sales agents (1.9). (Actual = 12.5).	12.0	\$245	\$ 2,940.00
02/12/2021	СМС	Updated cash flow analysis for debenture interest payments from $7/1/21$ through $12/31/21$ and provided response to MMY re: information requested by receiver.	3.1	\$300	\$ 930.00
02/16/2021	MMY	Telephone conversation with K. Donlon re: amounts due at time of freeze.	0.2	\$495	\$ 99.00
02/18/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.3	\$245	\$ 2,033.50
02/19/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	7.7	\$245	\$ 1,886.50

# **W YIP** ASSOCIATES

Invoice Number: 30546 Matter ID: 127.0004

Date	Initials	Description	Hours	Rate	 Amount
02/22/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	6.7	\$245	\$ 1,641.50
02/23/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.2	\$245	\$ 2,009.00
02/24/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	6.8	\$245	\$ 1,666.00
02/25/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.9	\$245	\$ 2,180.50
02/26/2021	HAL	Reviewed Complaint and source documents (no charge).	1.4	\$300	\$ -
02/26/2021	DDZ	Continued preparation of investor analysis, including compilation and review of investor information such as investment terms, addresses and investment history obtained from investor files, investor website and other records maintained by Equialt personnel, and reconciling this information to bank activity.	8.1	\$245	\$ 1,984.50
		Total Fees	146.6		\$ 36,693.50
		Total Amount Due			\$ 36,693.50



Date Initials Description Hours Rate Amount Please remit payment by mail to: Yip Associates 2 South Biscayne Blvd., Suite 2690 Miami, FL 33131 Or, via wire transfer to: IBERIA BANK 200 W Congress Street Lafayette, LA 70501 265270413 ABA Number: IBERIABANK Credit Account Information IB Customer Name: YIPCPA, LLC d/b/a YIP ASSOCIATES IB Account Number: 4400000149 Amount of Wire: \$36,693.50 For Credit to: Yip Associates 2 South Biscayne Blvd., Suite 2690 Miami, FL 33131



FINANCIAL INVESTIGATIONS

#### INVOICE SUMMARY OF PROFESSIONALS

Burton Wiand, Receiver Equialt et al. 5505 West Gray Street Tampa, FL 33609 Invoice Number: 30562 Date: April 13, 2021 Matter ID: 127.0004

99.2

#### Re: EquiAlt

For Professional Services Rendered March 1, 2021 to March 31, 2021.

Professional	Initials	Position	Experience	Hours	Rate	Fees
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Partner	27 Years	2.6	\$ 495.00	\$ 1,287.00
Hal A. Levenberg, CIRA, CFE (No Charge)	HAL	Director	13 Years	10.5	300.00	-
Danny D. Zamorano, CPA	DDZ	Manager	5 Years	78.8	245.00	19,306.00
Pamela Chuy	PC	Associate	10 Years	7.3	195.00	1,423.50
Blended Average Hourly Rate:					\$221.94	

**Total Fees:** 

MIAMI | FORT LAUDERDALE | BOCA RATON | TAMPA | NEW YORK | NEW JERSEY

\$ 22,016.50



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INV	OICE DETAIL	
Burton Wiand, Receiver	Invoice Number:	30562
Equialt et al.	Date:	April 13, 2021
5505 West Gray Street Tampa, FL 33609	Matter ID:	127.0004

Re: Equialt, et al.

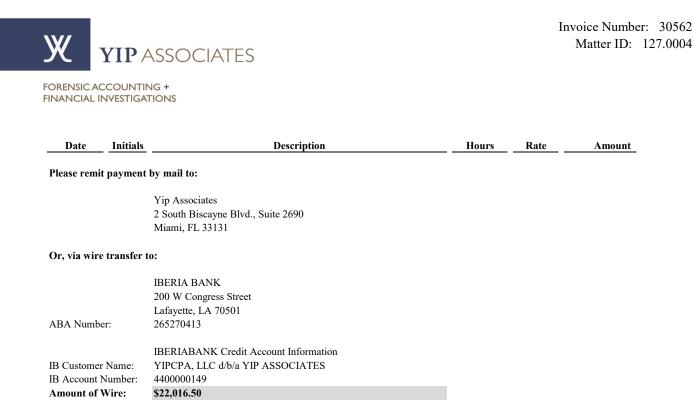
For Professional Services Rendered March 1, 2021 to March 31, 2021.

Date	Initials	Description	Hours	Rate	 Amount
03/01/2021	DDZ	Continued preparation of Investor Analysis - Summary of Net Loser Investments.	11.8	\$245	\$ 2,891.00
03/02/2021	MMY	Review of net winner and net loser analysis (.4) and conference call with K. Donlon and DDZ re: status update (.3).	0.7	\$495	\$ 346.50
03/02/2021	DDZ	Conference call with K. Donlon and MMY re: status updated (.3); continued preparation of Investor Analysis - Summary of Net Loser Investments (11.7).	12.0	\$245	\$ 2,940.00
03/02/2021	PC	Gathered information for Investor Analysis - Summary of Net Loser Investments.	4.1	\$195	\$ 799.50
03/03/2021	DDZ	Continued preparation of Investor Analysis - Summary of Net Loser Investments.	6.3	\$245	\$ 1,543.50
03/03/2021	PC	Gathered information for Investor Analysis - Summary of Net Loser Investments.	3.2	\$195	\$ 624.00
03/04/2021	MMY	Review of analysis of net loser investments and schedules on additional net winners.	0.5	\$495	\$ 247.50
03/04/2021	DDZ	Continued preparation of Investor Analysis - Summary of Net Loser Investments.	8.4	\$245	\$ 2,058.00
03/05/2021	DDZ	Performed research on E-Hound's document review platform (1.2); reviewed and analyzed Comerica bank accounts in the name of Rosenbarry Properties LLC (account ending x7261) and Barry M Rybicki (account ending x7721) (2.8); reviewed and analyzed credit card activity for Barclays and Citi credit cards held in the name of Barry Rybicki (3.1).	7.1	\$245	\$ 1,739.50
03/08/2021	MMY	Preparation for and conference call with K. Donlon and DDZ re: status.	0.4	\$495	\$ 198.00
03/08/2021	DDZ	Preparation of analysis of credit card activity for credit cards in the name of B. Rybicki (2.1); preparation for and conference call with K. Donlon and MMY re: status (.4).	2.5	\$245	\$ 612.50



Date	Initials	Description	Hours	Rate	 Amount
03/09/2021	DDZ	Continued preparation of credit card analysis for credit cards in the name of Rybicki.	6.3	\$245	\$ 1,543.50
03/10/2021	DDZ	Performed tracing of real estate purchases (Rybicki).	5.3	\$245	\$ 1,298.50
03/11/2021	DDZ	Continued tracing of real estate purchases made by B. Rybicki and related entities, including research on property appraiser's website.	6.8	\$245	\$ 1,666.00
03/12/2021	HAL	Reviewed available public records and deliverable folders (No Charge).	2.0	\$300	\$ -
03/12/2021	DDZ	Continued tracing of real estate purchases made by B. Rybicki and related entities.	7.4	\$245	\$ 1,813.00
03/16/2021	MMY	Discussion with DDZ re: analyses of Rybicki expenditures.	1.0	\$495	\$ 495.00
03/16/2021	DDZ	Discussion with MMY re: analysis of Rybicki expenditures (1.0); preparation of analysis of credit card activity (1.8).	2.8	\$245	\$ 686.00
03/17/2021	HAL	Reviewed Receiver's First Interim Report (No Charge).	2.0	\$300	\$ -
03/18/2021	DDZ	Conference call with M. McKinley re: Rybicki's assets.	1.3	\$245	\$ 318.50
03/19/2021	HAL	Discussion with DDZ re: transition of case (1.0) (No Charge); reviewed Second Receiver's Report (1.5) (No Charge).	2.5	\$300	\$ -
03/23/2021	DDZ	Gathered supporting documentation re: payments to investor.	0.5	\$245	\$ 122.50
03/24/2021	HAL	Reviewed deliverables (No Charge).	2.0	\$300	\$ -
03/25/2021	HAL	Reviewed Third Receiver's Report and accompanying schedules and exhibits (No Charge).	2.0	\$300	\$ -
03/29/2021	DDZ	Gathered supporting documentation re: payments to investor.	0.3	\$245	\$ 73.50
		Total Fees	99.2		\$ 22,016.50
		Total Amount Due			\$ 22,016.50

Amount



For Credit to:

Yip Associates 2 South Biscayne Blvd., Suite 2690 Miami, FL 33131

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# EXHIBIT 13

Total Consulting	1/19/2021 Consulting W	1/4/2021 Consulting W	Total Accounting & Auditing		1/27/2021 Accounting & Auditing SA	1/26/2021 Accounting & Auditing SA	1/22/2021 Accounting & Auditing PE	1/20/2021 Accounting & Auditing S/		1/19/2021 Accounting & Auditing S/						Accounting & Auditing									Accounting & Auditing						Accounting & Auditing	Accounting & Auditing		Accounting & Auditing							2021 Accounting & Auditing	Date Activity Category T
	WEO Reviewed tax documents received	WEP Reviewed cash reporting		SAO Reviewed accounting records	SAO Reviewed bank account activity	SAO Reviewed bank account activity	PDR CPAs Paid QuickBooks Monthly Subscription Fee on Behalf o	SAO Updated accounting records	SAO Reviewed bank account activity	SAO Reviewed accounting records	SAO Reviewed bank account activity	SAO Reviewed bank account activity	SAO Paid invoices	SAO Recorded bank account activity	SAO Recorded bank account activity		SAO Reviewed QuickBooks check order for correct banking	SAO Updated court report	SAO Updated accounting records	SAO Updated court report	SAO Updated accounting records	SAO Reviewed bank account activity	SAO Ordered QuickBooks checks	SAO Prepared court report for attorney		SAO Recorded bank account activity		SAO Updated accounting records	SAO Prepared court report for attorney	SAO Reviewed bank account activity					SAO Recorded bank account activity	SAO Reviewed bank account activity	SAO Reconciled #6843 bank account statement	SAO Discussed deposit with attorney	SAO Reconciled #1772 bank account statement		Recorded bank account activity	Timekeeper Description
1.25 \$	0.75 \$ 320.00 \$	0.50 \$ 320.00 \$	17.25 \$	\$ 125.00	0.30 \$ 125.00 \$	0.30 \$ 125.00 \$	f Receivership	0.20 \$ 125.00 \$		0.30 \$ 125.00 \$	\$ 125.00	0.30 \$ 125.00 \$	0.30 \$ 125.00 \$	\$ 125.00	0.50 \$ 125.00 \$	0.50 \$ 125.00	information 0.20 \$ 125.00	\$ 125.00	\$	\$	0.20 \$ 125.00 \$		\$ 125.00	\$	\$ 125.00	<del>S</del>	125.00	\$ 125.00	\$	\$ 125.00	\$ 125.00	ഗ	\$ 125.00	\$ 125.00	\$	0.80 \$ 125.00 \$	S	S	125.00	\$ 125.00	s S	Hours Rate
400.00	240.00	160.00	2,602.64	37.50	37.50	37.50	446.39	25.00	25.00	37.50	37.50	37.50	37.50	75.00	62.50	62.50	25.00	62.50	62.50	406.25	25.00	137.50	62.50	100.00	37.50	37.50	62.50	25.00	62.50	37.50	37.50	37.50	37.50	37.50	100.00	100.00	37.50	25.00	25.00	25.00	37.50	Amount

18.50

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3,002.64

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BURTON W. WIAND AS RECEIVER, EQUIALT, LLC January 1, 2021 through January 31, 2021



PDR CPAs + Advisors By Activity Category January 1, 2021 through January 31, 2021

Grand Total for January 2021	Activity Category Accounting & Auditing Consulting PDR - Out-of-Pocket Expenses
÷	<del>ა ა ა</del>
3,002.64	Amount 2,156.25 400.00 446.39

PDR expense is for the monthly online subscription fee for QuickBooks which is paid by PDR CPAs + Advisors on behalf of EquiAlt

CPAs -	J
+	
ADVISORS	刀

PDR CPAs + Advisors Total Hours and Dollars by Timekeeper January 1, 2021 through January 31, 2021

_	Initials WEP SAO PDR
<b>Total Billed for January 2021</b>	<u>Name</u> Wiliam E. Price Sharon O'Brien PDR Out-of-Pocket Expense
	Level Shareholder \$ Staff \$ PDR
	der \$ 320.00 \$ 125.00
18.50	Hours 1.25 17.25 -
φ	\$ \$ \$ \$
3,002.64	Amount 6 400.00 6 2,156.25 6 446.39

PDR expense is for the monthly online subscription fee for QuickBooks which is paid by PDR CPAs + Advisors on behalf of EquiAlt

Total Accounting & Auditing	2/26/2021 Accounting & Auditing	2/26/2021 Accounting & Auditing	2/24/2021 Accounting & Auditing	2/18/2021 Accounting & Auditing	2/17/2021 Accounting & Auditing	2/16/2021 Accounting & Auditing	2/16/2021 Accounting & Auditing	2/16/2021 Accounting & Auditing	2/15/2021 Accounting & Auditing	2/15/2021 Accounting & Auditing	2/15/2021 Accounting & Auditing	2/15/2021 Accounting & Auditing	2/12/2021 Accounting & Auditing	2/12/2021 Accounting & Auditing	2/12/2021 Accounting & Auditing				2/11/2021 Accounting & Auditing	2/10/2021 Accounting & Auditing	2/10/2021 Accounting & Auditing	2/10/2021 Accounting & Auditing	2/9/2021 Accounting & Auditing	2/9/2021 Accounting & Auditing	2/9/2021 Accounting & Auditing	2/9/2021 Accounting & Auditing	2/8/2021 Accounting & Auditing	2/8/2021 Accounting & Auditing	2/8/2021 Accounting & Auditing	2/8/2021 Accounting & Auditing	2/8/2021 Accounting & Auditing	2/5/2021 Accounting & Auditing	2/5/2021 Accounting & Auditing	2/4/2021 Accounting & Auditing	2/4/2021 Accounting & Auditing	2/4/2021 Accounting & Auditing	2/3/2021 Accounting & Auditing	2/1/2021 Accounting & Auditing	Date Activity Category	
	SAO	SAO	SAO	SAO	PDR CPAs	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	Timekeeper	
	Recorded inter-company transfers	Reviewed bank account activity	Updated accounting records	Prepared January 2021 Standardized Fund Accounting Report	Paid QuickBooks Monthly Subscription Fee on Behalf of Receivership	Reviewed bank account activity	Updated accounting records	Prepared January 2021 Standardized Fund Accounting Report	Recorded inter-company transfers	Prepared January 2021Standardized Fund Accounting Report	Reviewed bank account reports received	Updated Standardized Fund Accounting Report	Updated accounting records	Recorded bank account activity	Prepared Standardized Fund Accounting Report	Reviewed documents needed for Standardized Fund Accounting Report	Reviewed bank account activity	Reviewed bank account activity	Updated accounting records	Recorded bank account activity	Updated accounting records	Prepared Standardized Fund Accounting Report	Reviewed reports needed for attorney	Recorded bank account activity	Reviewed bank account activity	Updated accounting records	Reconciled bank account #6843 bank statement	Recorded bank account activity	Reconciled bank account #6850 bank statement	Reconciled bank account #1772 bank statement	Reconciled bank account #6191 bank statement	Reviewed bank account activity	Updated accounting records	Recorded bank account activity	Updated accounting records	Reviewed bank account activity	Reviewed bank account activity	Reviewed bank statements received	Description	February 1, 2021 through February 28, 2021
17.75	0.30	0.30	0.20	1.00	<del>ب</del> ۱	0.30	0.30	0.30	0.50	1.25	1.25	0.30	0.30	0.30	0.30	0.50	0.30	1.10	0.30	0.30	0.30	3.25	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	Hours	
	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00		\$ 125.00	\$ 125.00		\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00			\$ 125.00		\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	Rate	
⇔	\$ 00				<del>ഗ</del>		00 \$	-		-				-	\$ 00	20 \$		00 \$		\$ 00	00 \$		\$ 00			00 \$	00 \$		\$ 00			\$ 00		\$ 00	00 \$		00 \$	\$ 00		
2,665.14	37.50	37.50	25.00	125.00	446.39	37.50	37.50	37.50	62.50	156.25	156.25	37.50	37.50	37.50	37.50	62.50	37.50	137.50	37.50	37.50	37.50	406.25	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	37.50	Amount	

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	2/22/20	2/15/20	2/15/2C	2/12/2C	2/10/2C	2/9/20	2/4/2C	Date
Total Consulting	2/22/2021 Consulting	2/15/2021 Consulting	2/15/2021 Consulting	2/12/2021 Consulting	2/10/2021 Consulting	2/9/2021 Consulting	2/4/2021 Consulting	Activity Category
	WEP	WEP	GAH	GAH	GAH	WEP	WEP	Timekeeper
	Followed-up on 1099's and other business matters	Reviewed 4th Quarter 2020 Standardized Fund Accounting Report	Finalized receivership reports	Reviewed changes needed to 2020 Standardized Fund Accounting Report	Reviewed 4th Quarter 2020 Standardized Fund Accounting Report	Reviewed Standardized Fund Accounting Report	Followed-up regarding 1099's	Description
9.75	2.25 \$	1.00 \$	0.75 \$	1.25 \$	3.00 \$	0.75 \$	0.75 \$	Hours
	\$ 320.00	•••				\$ 320.00		Rate
÷	÷	÷	÷	÷	÷	÷	÷	A
2,295.00	720.00	320.00	116.25	193.75	465.00	240.00	240.00	Amount

Total Burton Wiand as Receiver, Equialt, LLC Management

\$ 4,960.14

27.50



February 1, 2021 through February 28, 2021 By Activity Category PDR CPAs + Advisors

Grand Total for February 2021	PDR - Out-of-Pocket Expenses	Consulting	Accounting & Auditing	Activity Category
⇔	ഗ	ഗ	ക	
4,960.14	446.39	2,218.75	2,295.00	Amount

PDR expense is for the monthly online subscription fee for QuickBooks which is paid by PDR CPAs + Advisors on behalf of EquiAlt

CPAs +	J
+ ADVISOR	
ISORS	$\mathbf{z}$

PDR CPAs + Advisors Total Hours and Dollars by Timekeeper February 1, 2021 through February 28, 2021

_	PDR	SAO	GAH	WEP	<u>Initials</u>
<b>Total Billed for February 2021</b>	PDR Out-of-Pocket Expense	Sharon O'Brien	Gail Heinold	Wiliam E. Price	Name
		Staff			
	•	\$ 125.00	\$ 155.00	\$ 320.00	<u>Rate</u>
27.50		17.75	5.00	4.75	Hours
\$	မ	φ	φ	φ	
4,960.14	446.39	\$ 2,218.75	775.00	1,520.00	Amount

PDR expense is for the monthly online subscription fee for QuickBooks which is paid by PDR CPAs + Advisors on behalf of EquiAlt

Total Burton Wiand as Receiver, Equialt, LLC Management	Total Accounting & Auditing	3/29/2021 Accounting & Auditing	3/25/2021 Accounting & Auditing	3/24/2021 Accounting & Auditing	3/23/2021 Accounting & Auditing	3/20/2021 Accounting & Auditing	3/19/2021 Accounting & Auditing	3/19/2021 Accounting & Auditing	3/19/2021 Accounting & Auditing	3/18/2021 Accounting & Auditing	3/17/2021 Accounting & Auditing	3/16/2021 Accounting & Auditing		3/12/2021 Accounting & Auditing	3/10/2021 Accounting & Auditing	3/9/2021 Accounting & Auditing		3/8/2021 Accounting & Auditing		3/8/2021 Accounting & Auditing		3/6/2021 Accounting & Auditing	3/6/2021 Accounting & Auditing		3/5/2021 Accounting & Auditing		3/2/2021 Accounting & Auditing		3/1/2021 Accounting & Auditing	Total Consulting	3/8/2021 Consulting	3/1/2021 Consulting	Iotal Lax Services	3/22/2021   ax Services	_	3/10/2021 Tax Services	3/10/2021 Tax Services	3/6/2021 Tax Services	Date Activity Category	
iver, Equialt, LL(		SAO	PDR CPAs	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO	SAO		GAH	WEP		VET	CJZ	WEP	WEP	WEP	Timekeeper								
C Management		Updated accounting records	Reviewed bank account activity	Updated accounting records	Reviewed bank account activity	Reviewed bank account activity	Recorded bank account activity	Reconciled #6843 bank statement		Paid QuickBooks Monthly Subscription Fee on Behalf of Receivership	Reviewed bank account activity	Recorded bank account activity	Updated accounting records	Reviewed bank account activity	Reviewed bank account activity	Updated accounting records	Recorded inter-company transfers	Reviewed bank account activity for CPA and discussed with attorney	Prepared report for CPA regarding fees paid	Reviewed professional fees since inception	Reviewed bank account activity	Updated accounting records	Prepared reports for CPA	Updated accounting records	Reviewed bank account activity	Recorded bank account activity	Reviewed account activity	Reviewed account activity	Updated accounting records		Reviewed professional fees reconciliation QuickBooks reports		Reviewed documentation related to the required minimum distribution for IRA	Reviewed and signed December 31, 2020 tax return	Reviewed December 31, 2020 tax return	Prepared December 31, 2020 State of Florida tax return	Prepped and assembled December 31, 2020 tax return	Prepped December 31, 2020 tax return	Description	BURTON W. WIAND AS RECEIVER, EQUIALT, LLC March 1, 2021 through March 31, 2021
17.57	11.82	0.30		0.30	0.30 \$	0.30	0.20	0.30	0.30		0.30	0.32			0.20	0.30	0.50	1.80							0.30		0.25		0.30	0.50		0.25	5.25					1.75	Hours	
		\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00		\$ 125.00	\$ 125.00		\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00		\$ 125.00		\$ 125.00	\$ 125.00	\$ 125.00	\$ 125.00		\$ 125.00		\$ 125.00			\$ 320.00		\$ 320.00	\$ 230.00			\$ 320.00	Rate	
\$	÷	1	00 \$	00 \$			00 \$			<del>ഗ</del>				00 \$		00 \$				1	00 \$								00 \$	<del>\$</del>		00 \$	÷		00 \$		00 \$			
3,676.64	1,922.89	37.50	37.50	37.50	37.50	37.50	25.00	37.50	37.50	445.39	37.50	40.00	37.50	62.50	25.00	37.50	62.50	225.00	62.50	62.50	37.50	31.25	250.00	37.50	37.50	37.50	31.25	37.50	37.50	118.75	38.75	80.00	1,635.00	160.00	115.00	80.00	720.00	560.00	Amount	

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PDR CPAs + Advisors By Activity Category March 1, 2021 through March 31, 2021

Grand Total for March 2021	PDR - Out-of-Pocket Expenses	Consulting	Tax Services	Accounting & Auditing	Activity Category
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3,676.64	445.39	118.75	1,635.00	1,477.50	Amount

PDR expense is for the monthly online subscription fee for QuickBooks which is paid by PDR CPAs + Advisors on behalf of EquiAlt

	CPAs + ADVISORS Total Hou	Total Hours and Dollars by Timekeeper March 1, 2021 through March 31, 2021	by Timeke larch 31, 2	o21
Initials	Name		Rate	Hours
VEP		CPA	\$ 320.00	5.00
CJZ	CJ Zygaldo	ıger	\$ 230.00	0.50
GAH		Manager	\$ 155.00	0.25
SAO		Staff	\$ 125.00	11.82
PDR	xpense	PDR	ı	ı

**Total Hours and Dollars by Timekeeper** PDR CPAs + Advisors

PDR expense is for the monthly online subscription fee for QuickBooks which is paid by PDR CPAs + Advisors on behalf of EquiAlt

**Total Billed for March 2021** 

17.57

\$ 3,676.64

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# EXHIBIT 14



# Invoice for Services

www.ehounds.com (727) 726-8985

Open Dat 01/01/2021		ase Reference (E9563) in RE: EquiAlt	Terms Due on Rece	ipt
	Invoice to: Guerra King GK 5505 W. Gray Street Tampa, FL 33609	Case Contact: Guerra King Jeffery Rizzo 813-347-5123		
Q Date	Expedited All quantities are based Hourly un	less otherwise noted	Tech Price	Ext
2 01/06/	2021 E-Hounds Review® Platform (incl 2 user seat) Courtesy Rate Mo	nthly	\$495.00	\$990.00

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. R additional services may result in our request for additional retainer.	equesting SUBTOTAL	\$990.00
Payments Applied		
	TOTAL	\$990.00
	Balance Due	\$990.00
	Retainer Amount Remaining	\$0.02
Please note: Our fees are subject to change annually. Last change: 1/2/2018 Statement of Limited Liability and Financial Responsibility	E-Hounds also accepts:	

Statement of Limited Liability and Financial Responsibility E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLITELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of the update of the cavelid behavior and the price data being and the price equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 15% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.



# Invoice for Services

Palm Harbor, Florida 34684 www.ehounds.com (727) 726-8985

	en Date 01/2021	Close Date 02/28/2021	Invoice # 89152	Balance Due \$4321.50	Case Reference (E9563) in RE: EquiAlt	Terms	ue on Rece	eipt
		Invoice to: Guerra King GK 5505 W. Gray Street Tampa, FL 33609			Case Contact: Guerra King Jeffery Rizzo 813-347-5123			
Q	Date	Expedited	All quantit	ies are based Hourly	unless otherwise noted	Tech	Price	Ext
2	02/01/2021	E-Hounds Rev	view® Platform (incl 2	2 user seat) Courtesy Rate	Monthly		\$495.00	\$990.00
1	02/16/2021	Intake/Collecti	on/Preservation Linc	de		RTR	\$225.00	\$225.00
1.5	02/16/2021	Technician Ho	ours R. Rohr / Linode	Server/Config for Preserv	ition	RTR	\$195.00	\$292.50
1.2	02/19/2021	Project Manag	jement - Search Req	uest - Tag- Deliverable Se	arch request   load file   DLA, Fox Wassgr	en search-sent to DAB	\$195.00	\$234.00
1.8	02/19/2021	Data Extractio	n and Load Prep (Lir	node investor portal)		ADS	\$300.00	\$540.00
6.8								

If you would prefer to apply the balance of your retainer to this statement, please pay the difference additional services may result in our request for additional retainer.	. Requesting SUBTOTAL	\$4321.50
Payments Applied		
	TOTAL	\$4321.50
	Balance Due	\$4321.50
	Retainer Amount Remaining	\$0.02
Please note: Our fees are subject to change annually. Last change: 1/2/2021	E-Hounds also accepts:	

### Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable



# Invoice for Services

32815 US 19 North Suite 100 Palm Harbor, Florida 34684 www.ehounds.com (727) 726-8985

	oen Date /01/2021		e Date 1/2021	Invoice # 90395	Balance Due		eference (E9563) in RE: EquiAlt	T	erms Du	ie on Rece	ipt
		Invoice to Guerra Kir GK 5505 W. C Tampa, FL	ng Gray Street				Case Contact: Guerra King Jeffery Rizzo 813-347-5123				
Q	- Date	Expedited		All quantiti	es are based Hourly	unless of	herwise noted		Tech	Price	Ext
2	03/01/202	1	E-Hounds Revie	w® Platform (incl 2	user seat) Courtesy Rate	Monthly				\$595.00	\$1190.00
2	03/10/202	1	Intake/Collection	(Email) ir@equialt	reit.com and timberridge@	equialt.com	1		RTR	\$250.00	\$500.00
1	03/10/202	1	Project Manager	nent - Data Load-in	, Indexing, QC, OCR ir ar	d timberridg	je emails		RTR	\$195.00	\$195.00
1.3	03/15/202	1	Conf call and foll	owup Rohr/Stines/	Donlan				RTR	\$195.00	\$253.50
3	03/31/202	1	E-Hounds Revie	w® Platform Add'l	Jsers (per user) Monthly F	Recurring (jp	firm)			\$125.00	\$375.00

If you would prefer to apply the balance of your retainer to this statement, please pay the differer additional services may result in our request for additional retainer.	nce. Requesting SUBTOTAL	\$2513.50
Payments Applied		
	TOTAL	\$2513.50
	Balance Due	\$2513.50
	Retainer Amount Remainin	g \$0.02
Please note: Our fees are subject to change annually. Last change: 1/2/2021 Statement of Limited Liability and Financial Responsibility	E-Hounds also accepts:	

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable

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# **EXHIBIT 15**

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March 9, 2021

FEIN #36-3238755

Burton Wiand Wiant Guerra King P.A. 5505 W. Gray Street Tampa, FL 33609

Attorneys at Law

311 South Wacker Drive Suite 3000 Chicago, Illinois 60606-6677 Tel 312.360.6000

Statement No. 100434379

Re: <u>SEC v. Davison, et al</u> Client Matter ID No. 33710-0001

Chicago	FOR PROFESSIONAL SERVICES RENDERED AND EXPEN	SES INCURRED
Springfield	THROUGH FEBRUARY 28, 2021:	
Richmond		
New York		
Tampa	FEES FOR THIS STATEMENT	\$1,518.00
	DISBURSEMENTS	<u>0.00</u>
	TOTAL AMOUNT OF CURRENT STATEMENT	1,518.00

BALANCE DUE

<u>\$1,518.00</u>

# 

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2

March 9, 2021

Statement No: 100434379

For professional services rendered with regard to:

Re: SEC v. Davison, et al

Feb 15, 2021	RAS	Analyze status of access to data on investor portal, telephone conference with Linode that maintains the server that contains the data, and determine whether we have super user access to the server.	2.10
Feb 15, 2021	RAS	Prepare memo for E-discovery team regarding status of accessing investor portal data and possible methods to access the data.	1.10
Feb 16, 2021	RAS	Telephone call with E-hounds to discuss access to the Linode remote server that may provide the data found on the investor portal.	0.40
Feb 17, 2021	RAS	Analyze issue with granting class action parties access to emails within Receiver's possession.	0.30
Feb 19, 2021	RAS	Analysis of investor data that was contained in the SQL database on the Linode server.	0.50

### FEE SUMMARY

<u>TIMEKEEPER ROLE</u> Partner	<u>TIMEKEEPER</u> Stines, Robert A.	<u>HOURS</u> 4.40	<u>RATE</u> 345.00	<u>FEES</u> \$1,518.00
	TOTAL HOURS	4.40		
	TOTAL FEES			<u>\$1,518.00</u>

### TOTAL FEES AND DISBURSEMENTS \$1,518.00

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April 8, 2021

FEIN #36-3238755

Burton Wiand Wiant Guerra King P.A. 5505 W. Gray Street Tampa, FL 33609

Attorneys at Law

311 South Wacker Drive Suite 3000 Chicago, Illinois 60606-6677 Tel 312.360.6000

Statement No. 100438292

Re:

SEC v. Davison, et al Client Matter ID No. 33710-0001

Chicago Springfield Richmond	FOR PROFESSIONAL SERVICES RENDERED AND EXPENSES INCURRED THROUGH MARCH 31, 2021:				
New York Tampa	FEES FOR THIS STATEMENT DISBURSEMENTS	\$1,759.50 <u>0.00</u>			
	TOTAL AMOUNT OF CURRENT STATEMENT	1,759.50			
	BALANCE DUE	<u>\$1,759.50</u>			

# 

PAYMENT DUE UPON RECEIPT. INTEREST OF 1.5% PER MONTH WILL BE ADDED AFTER 30 DAYS Case 8:20-cv-00325-MSS-AEP Document 320-15 Filed 06/01/21 Page 5 of 6 PageID 7362



2

April 8, 2021

Statement No: 100438292

For professional services rendered with regard to:

Re: SEC v. Davison, et al

Mar 8, 2021	RAS	Review court order denying defendant's Brian Davison's motion to dismiss the amended complaint.	0.50
Mar 10, 2021	RAS	Analyze issues regarding email addresses belonging to Davison and that we have not obtained and we were not aware of.	0.20
Mar 10, 2021	RAS	Analyze Rybicki's request for production to the securities exchange commission to determine how to produce responsive documents.	0.20
Mar 11, 2021	RAS	Telephone call with digital forensics team to determine how best to respond to Brian Rybicki's request for production of emails and other communications.	0.40
Mar 15, 2021	RAS	Prepare response to Davison's attorney regarding email data for production.	0.30
Mar 15, 2021	RAS	Telephone call with counsel for the securities exchange commission to discuss responding to request for production seeking email accounts and text messages.	0.40
Mar 15, 2021	RAS	Telephone call with Davison's counsel to discuss production of emails.	0.30
Mar 17, 2021	RAS	Telephone call with Rybicki's litigation team to discuss production of emails and text messages.	0.50
Mar 17, 2021	RAS	Telephone call with forensics team to determine best method to produce data and emails to attorneys for Davison and Rybicki and to determine best search terms.	0.30
Mar 17, 2021	RAS	Prepare correspondence to Rybicki's litigation team regarding production of emails and text messages.	0.50

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		3		А	April 8, 2021	
Mar 17, 2021	RAS	Analyze request for pr to prepare for call wit production of emails a	h his counsel rega	rding	0.40	
Mar 24, 2021	RAS	Analyze emails that we preserved from Barry1.10Rybicki to produce documents that the SECrequested.				
FEE SUMMAR	RY					
<u>TIMEKEEPER</u> Partner	<u>ROLE</u>	TIMEKEEPER Stines, Robert A.	HOURS 5.10	<u>RATE</u> 345.00	<u>FEES</u> \$1,759.50	
		TOTAL HOURS	5.10			

TOTAL FEES	<u>\$1,759.50</u>

TOTAL FEES AND DISBURSEMENTS	\$1,759.50
	+-,

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# **EXHIBIT 16**

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WIAND GUERRA KING 5505 W. GRAY ST. TAMPA, FL 33609

Statement Date:April 14, 2021Statement No.259Account No.128.01

RE: SEC V. BRIAN DAVISON, ET AL.

#### Fees

			Hours	Amount
03/31/2021	MZM	Email Andre Zamorano from SEC regarding locating contact information for Cal Babbini For Current Services Rendered	0.10 0.10	$\frac{22.50}{22.50}$
		Previous Balance		\$90.00
		Total Current Work		22.50
		Balance Due		\$112.50

### DUE UPON RECEIPT

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### SUMMARY OF FEES BY PROFESSIONAL

Mladen Milovic (MZM) Associate 0.1 hrs at \$225/hr

\$22.50