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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,  
  
Plaintiff,  
  
v.  
  
ASCEND CAPVENTURES INC., et al.,  
  
Defendants.

Case No. 2:24-CV-07660-SPG-JPR

**AMENDED FIRST INTERIM  
APPLICATION FOR PAYMENT OF  
FEES OF RECEIVER, STEPHEN J.  
DONELL, AND HIS  
PROFESSIONALS**

[Memorandum of Points and Authorities;  
Declaration of Stephen J. Donell;  
Declaration of Joshua A. del Castillo;  
Declaration of Brian J. Landau;  
Declaration of Alan R. Rosenberg;  
Declaration of Frances A. Smith; and  
[Proposed] Order submitted concurrently  
herewith]

Date: April 23, 2025  
Time: 1:30 p.m.  
Ctrm: 5C  
Judge Hon. Sherilyn Peace Garnett

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1 In accordance with Section XVIII of this Court's September 13, 2024 *Order*  
2 *on Plaintiff's Ex Parte Application For (1) Temporary Restraining Order and Order*  
3 *to Show Cause Why a Preliminary Injunction Should Not Issue; (2) Waiver of*  
4 *Notice Requirement; (3) Appointment of a Temporary Receiver, Freezing of Assets;*  
5 *and other Equitable Relief* (the "Initial Appointment Order") [ECF No. 30] and  
6 Section XVIII of the Court's December 3, 2024 *Order Granting Stipulation for*  
7 *Court to Enter Preliminary Injunction* (the "Preliminary Injunction") [ECF No. 82],  
8 and guided by this Court's February 24, 2025 *Order Denying, in Part, and Granting,*  
9 *in Part, First Interim Application for Payment of Fees and Reimbursement of*  
10 *Expenses of Receiver Stephen J. Donell and his Professionals* (the "Initial Fee  
11 Order") [ECF No. 89], Stephen J. Donell (the "Receiver"), the Court-appointed  
12 receiver in the above-entitled action, along with his general receivership counsel,  
13 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), his forensic  
14 accounting firm, SL Biggs, and local counsel Ross, Smith & Binford, PC (now,  
15 Ross & Smith, PC ["RSB"]) and Markowitz Ringel Trusty & Hartog, P.A.  
16 ("MRTH", and together with Allen Matkins, SL Biggs, and RSB, the  
17 "Professionals"), hereby jointly submit this amended first interim application (the  
18 "Application") for the payment of fees incurred from September 13, 2024 through  
19 October 31, 2024.

20 I. **INTRODUCTION.**

21 The Application is the second version of the first interim fee application  
22 submitted in this action, and covers the fees and expenses incurred by the Receiver  
23 and his Professionals (collectively, the "Applicants") during the period from the  
24 Receiver's appointment on September 13, 2024 through October 31, 2024 (the  
25 "Application Period"). By way of the Application, the Applicants request the  
26 Court's approval of 100% of their fees incurred during the Application Period, and  
27 authorization for the Receiver to make payment thereof from the funds of the  
28 receivership estate (the "Receivership Estate" or "Estate") established by the Initial

1 Appointment Order and reaffirmed in the Preliminary Injunction. As compared to  
2 the original version of their application (*see* EFC Nos. 78, *et seq.*), by way of the  
3 Application, the Applicants request only the approval and payment of fees incurred  
4 during the Application Period— expenses having been approved in the Initial Fee  
5 Order – and no longer condition their request for payment on the availability of  
6 funds sufficient to cover the requested fees, given that the Receiver has recently  
7 recovered significant additional funds sufficient to enable the Estate to more than  
8 cover the fees requested. (*See* concurrently filed Declaration of Stephen J. Donell  
9 [*"Donell Decl."*] ¶ 3.)

10 The fee amounts requested by this Application are as follows:

Applicant	Fees
Receiver	\$69,897.15
Allen Matkins	\$145,013.85
MRTTH	\$3,000.00
RSB	\$20,317.50
SL Biggs	\$70,337.00
	<b>\$308,565.50</b>

17  
18 In order to minimize administrative expenses to the Estate, the Receiver has  
19 applied a discount of 10% to all fees incurred during the Application Period.  
20 (Donell Decl. ¶ 4.) Likewise, as an accommodation to the Receiver and the Estate,  
21 Allen Matkins has applied a 10% across-the-board discount of its standard  
22 receivership billing rates (amounting to a discount of nearly 36% from its national  
23 rates for certain timekeepers), and a rate freeze, for all attorney and paralegal  
24 timekeepers for the duration of this engagement.<sup>1</sup> (See concurrently filed  
25

26 <sup>1</sup> In addition to these accommodations, and in recognition of the significant  
27 amount of work typically required at the outset of similar receivership cases,  
28 Allen Matkins has also applied a one-time discount of more than \$15,000 to its  
fees incurred during the Application Period. This additional discount has already  
been applied and is included in the totals reflected in this Application. (del  
Castillo Decl. ¶ 3.)

1 Declaration of Joshua A. del Castillo ["del Castillo Decl." ¶ 3.) As a consequence,  
2 the fees charged by the Receiver and Allen Matkins during the Application Period  
3 are meaningfully below those that would have been charged at their standard billing  
4 rates, with a resultant benefit to the Estate. Indeed, the Applicants – all of whom  
5 have significant and long term experience in receiverships and similar creditors'  
6 rights matters – respectfully submit that their respective billing rates, as reflected in  
7 the Application, are consistent with or below the rates charged by similarly qualified  
8 professionals in analogous federal receivership engagements. (Donell Decl. ¶ 4; del  
9 Castillo Decl. ¶ 5, Ex. B; concurrently filed Declaration of Brian J. Landau  
10 ["Landau Decl."] ¶ 5; concurrently filed Declaration of Alan R. Rosenberg  
11 ["Rosenberg Decl."] ¶ 4; concurrently filed Declaration of Frances A. Smith ["Smith  
12 Decl."] ¶ 4.)

13 The Applicants further note that fee applications in receivership cases of this  
14 nature tend to be higher during the initial stages of a case as a result of the  
15 substantial work required at the commencement of a receivership, within a  
16 condensed timeframe, to undertake necessary site visits, obtain and commence an  
17 expedited analysis of critical financial documents, identify and recover Estate assets,  
18 and generally work to stabilize the Estate and maximize the likelihood of reserving  
19 the *status quo* as promptly as possible.

20 As reflected in the Receiver's concurrently submitted *Supplement to Second*  
21 *Interim Report and Petition for Instructions* (the "Report Supplement"), funds in  
22 excess of \$825,000 have now been turned over to the Receiver for the benefit of the  
23 Estate and its creditors, to say nothing of two real properties recently turned over  
24 with an estimated aggregate net value of approximately \$1 million<sup>2</sup>, which real  
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26 <sup>2</sup> As reflected in the Receiver's contemporaneously filed Report Supplement, at the  
27 time turnover was required, defendants Basta and Leung informed the Receiver,  
28 through counsel and for the first time, that the secured lender for one of the  
properties had "repossessed" the property – apparently in violation of this Court's  
injunction against self-help – and that the other property was occupied by a  
previously undisclosed "long term" tenant. Notwithstanding these complications,

1 properties the Court has already authorized the Receiver to market and sell. (*See*  
2 ECF No. 92 [the "Turnover Order"].) Accordingly, the Receiver is confident that  
3 sufficient funds are available to fully compensate all Applicants in accordance with  
4 the Application, and to support the continued administration of the receivership, in  
5 accordance with whatever orders the Court may yet enter.

6 **II. THE APPLICANTS' QUALIFICATIONS.**

7 **A. The Receiver.**

8 The Receiver has decades of experience serving as a court-appointed receiver  
9 in federal and state matters, having been appointed in over 900 distinct matters,  
10 including numerous enforcement actions brought by the U.S. Securities and  
11 Exchange Commission ("SEC") and the Federal Trade Commission ("FTC").  
12 (Donell Decl. ¶ 5, Ex. A.) In addition to his professional experience, the Receiver is  
13 a past President of the National Association of Federal Equity Receivers  
14 ("NAFER"), a leading association comprised of professionals working in the areas  
15 of receivership, insolvency, bankruptcy, restructuring, and asset recovery. He is  
16 also the past President of the Los Angeles / Orange County chapter of the California  
17 Receivers Forum – the largest state receiver trade organization in the country – and  
18 currently serves on its California Board of Directors. (*Id.*) The Receiver is also a  
19 regular presenter and author on receivership issues, and has served, among other  
20 things, as a speaker or presenter on receiverships matters at multiple NAFER, CCIM  
21 Institute, California Receivers' Forum, California Bankruptcy Forum, and California  
22 State Bar events. (*Id.*)

23 **B. Allen Matkins.**

24 The Receiver's lead receivership counsel, Allen Matkins, has been active in  
25 the receivership community for decades, and maintains an active and wide-ranging  
26

27  
28 and based on the information presently available, the Receiver believes he can  
successfully recover the properties, as ordered by this Court, and monetize them  
for the benefit of the Estate.

1 receiverships practice, having served as lead receivership counsel in dozens of  
2 federal equity receivership matters, including the above-entitled action. (del Castillo  
3 Decl. ¶ 2.) Joshua del Castillo, the Allen Matkins partner serving as team lead in  
4 this matter has nearly nineteen (19) years of experience representing court-appointed  
5 receivers in government enforcement actions, including actions brought by the SEC  
6 and FTC. (*Id.* at ¶¶ 2, 4 and Ex. A.) He is also an active member of NAFER, a  
7 former member of the California Receivers Forum and Financial Lawyers  
8 Conference, and a regular speaker at receivership events, having produced and  
9 served as a panelist at several of NAFER's recent annual conferences, in addition to  
10 serving as a co-author for other speakers' presentations. (*Id.* at ¶ 4.) Mr. del Castillo  
11 regularly publishes on developments in receivership law, and, with the Receiver, co-  
12 authored a number of articles, including an oft-cited analysis of a receiver's  
13 authority to sell estate assets, originally published by the California Receivers  
14 Forum. (*Id.*)

15 **C. SL Biggs.**

16 The Receiver's forensic accountant, Brian Landau of SL Biggs, is a certified  
17 public accountant with over twenty (20) years of accounting experience in  
18 bankruptcy and other fiduciary matters, including state and federal receiverships.  
19 (*See* Landau Decl. ¶ 2.) Mr. Landau has handled hundreds of receivership and  
20 bankruptcy matters, working for both federal and state court-appointed receivers, as  
21 well as chapter 7 bankruptcy trustees. (*Id.* at ¶ 3, Ex. A.) Like the instant matter,  
22 many of these cases involved tracing of funds, fraudulent conveyance analysis, and  
23 determining and resolving tax obligations for the parties involved. (*Id.*) In addition  
24 to his specific experience in bankruptcy and receivership matters, Mr. Landau has  
25 actively participated in the Los Angeles Bankruptcy Forum and the California  
26 Bankruptcy Forum, including in connection with panel organization for their annual  
27 conference. (*Id.* at ¶ 4.)

28

1           **D.     MRTH.**

2           The Receiver's Florida local counsel, Alan Rosenberg of MRTH, is an  
3 experienced Florida attorney with years of experience in bankruptcy and similar  
4 fiduciary engagements. (*See* Rosenberg Decl. at ¶¶ 2,3 and Ex. A.) He is the  
5 President-elect of the Bankruptcy Bar Association for the Southern District of  
6 Florida. (*Id.* at ¶ 3.) In addition, he was recognized by the American Bankruptcy  
7 Institute ("ABI") as among its "40 Under 40" in 2020. (*Id.*) He is a regular  
8 contributor to and publisher in the area of bankruptcy law, and has authored, co-  
9 authored, or edited dozens of articles, including a book and a number of articles  
10 published by ABI – two of which were included in ABI's "Best Of" lists for 2019  
11 and 2022 – and most recently, the Emory Bankruptcy Developments Journal. (*Id.*)  
12 He is also a regular speaker at bankruptcy-related conferences, recently presenting at  
13 the ABI's Winter Leadership Conference in December 2023 and the University of  
14 Miami's 33rd Annual Bankruptcy Skills Workshop, in June 2023. (*Id.*)

15           **E.     RSB.**

16           The Receiver's lead Texas counsel, Frances Smith of RSB, is a Texas attorney  
17 with over 20 years of experience in bankruptcy and other fiduciary matters. (Smith  
18 Decl. ¶¶ 2, 3 and Ex. A.) She is the immediate past Chair of the Bankruptcy Section  
19 for the State Bar of Texas, and serves on the Executive Committee of the John C.  
20 Ford Bankruptcy Inn of Court, a professional organization providing educational  
21 programs in bankruptcy law. (*Id.*) She regularly speaks and publishes regarding  
22 developments in bankruptcy and related areas of the law, and has co-authored  
23 numerous publications made through the ABI, the National Conference of  
24 Bankruptcy Judges, and the Texas State Bar. (*Id.*)

25       **III.    GENERAL SUMMARY.**

26           During the Application Period, and with substantial assistance from his  
27 Professionals, the Receiver undertook efforts in four critical areas of relevance to his  
28 duties under the Initial Appointment Order: (a) undertaking efforts to preserve the



1 *status quo* and prevent ongoing harm to allegedly injured Entity customers;  
2 (b) developing an understanding of the business and financial activities of the  
3 Receivership Entities (as defined in the Initial Appointment Order) in order to  
4 determine whether they are operating a legitimate business enterprise that has value  
5 as a going concern, including inspections and investigations of the Receivership  
6 Entities' purported places of business; (c) preparing a preliminary accounting of the  
7 funds raised and expended by the Receivership Entities and their principals and  
8 agents, including identifying and assuming control over funds recoverable for the  
9 benefit of the Estate and its creditors (including consumers allegedly defrauded by  
10 the Receivership Entities); and (d) tracing and recovering funds apparently  
11 unlawfully diverted from the Receivership Entities for the unilateral benefit of the  
12 defendants, including but not limited to the purchase of real property assets in  
13 multiple states, some of which have since been turned over to the Receiver.

14 As reflected in the Receiver's *First Interim Report and Petition for*  
15 *Instructions* (ECF No. 77-1) and *Second Interim Report and Petition for Instructions*  
16 (ECF No. 88-1) (collectively, the "Reports"), the Receiver has been unable to  
17 confirm, in his reasonable business judgment, that the Receivership Entities' e-  
18 commerce servicing business was entirely or consistently legitimate,  
19 notwithstanding the fact that the Entities appear to have occasionally provided at  
20 least limited e-commerce services to certain consumers. In addition, the Receiver  
21 has preliminarily concluded that the Receivership Entities likely cannot be operated  
22 (or sold) as a going concern. Among the reasons underlying these preliminary  
23 conclusions are: (a) the Receivership Entities' purported places of business did not  
24 contain any items or records suggesting the existence of a properly administered  
25 commercial enterprise; (b) the Receivership Entities maintained few, if any, records  
26 in a manner consistent with the customs and practices of a commercial enterprise;  
27 (c) the Receivership Entities diverted millions of dollars in funds raised from  
28 consumers for purposes apparently unrelated to their e-commerce business, critically



1 including to enable the Receivership Entities' principals, or their affiliates, to  
2 purchase multi-million dollar properties; and (d) notwithstanding the  
3 commencement of the instant receivership, persons apparently employed by the  
4 Entities in the pre-receivership period have consistently pursued efforts to solicit  
5 additional payments – allegedly on behalf of the Entities – for services that the  
6 Receiver is confident would never be provided; in other words, former Entity  
7 personnel appear to have engaged in a post-receivership effort to defraud Entity  
8 consumers.

9       The Receiver is confident that the work he and his Professionals have  
10 performed to date has been valuable to the Estate. Indeed, their efforts have resulted  
11 in the recovery of an estimated \$1.8 million in value for the benefit of the Estate and  
12 its creditors – recoveries that would have been impossible or substantially more  
13 difficult or protracted had the Receiver and his Professionals not undertaken the  
14 efforts described in the Application. These efforts also paid non-monetary  
15 dividends as addressed in the Reports, critically including a reduction in ongoing  
16 consumer harm resulting from the Receiver's and his Professionals' diligent efforts  
17 to close down unlawful post-receivership efforts to solicit Entity customers, suspend  
18 ongoing billing operations to customers for services that were not provided, and  
19 efforts to facilitate consumer contact with various online marketing platforms (e.g.,  
20 Amazon, Wal-Mart, etc.). Given the amount and significance of the work  
21 completed by the Applicants during the Application Period, the Receiver  
22 respectfully submits that the fees incurred by the Applicants are reasonable and  
23 appropriate, and should be approved and paid, in full, in the amounts indicated in  
24 the Application.

25 **IV. THE RECEIVER'S FEES.**

26       The Receiver was appointed at the behest of the plaintiff Federal Trade  
27 Commission (the "FTC") based, in part, on his extensive experience in the federal  
28 receivership space, including his experience investigating allegedly fraudulent

1 schemes, evaluating the viability of business enterprises, and recovering assets for  
2 scheme victims. He has applied his experience in all of these areas here.

3 Specifically, during the Application Period, the Receiver, his staff, and his  
4 Professionals worked diligently to: (a) preserve the *status quo* and prevent harm to  
5 allegedly injured customers of the Entities; (b) identify and secure receivership  
6 assets, including hundreds of thousands of dollars in funds stored in bank accounts  
7 held by or for the benefit of Receivership Entities; (c) conduct a detailed  
8 examination of the business activities and financial transactions of the Receivership  
9 Entities and the Individual Defendants (as defined in the Initial Appointment Order);  
10 and (d) obtain and review substantial documentation from financial institutions,  
11 internet platforms, escrow companies, and other third parties formerly engaged with  
12 the Receivership Entities or defendants Basta and Leung.

13 In order to undertake these efforts, and during the Application Period, the  
14 Receiver and his staff Receiver coordinated closely with the FTC to prepare and  
15 transmit notices of the Initial Appointment Order, including notification of the  
16 resultant asset freeze and demand for turnover of documents, as well as exchanging  
17 information regarding the parties' initial document recovery efforts. This included  
18 in-depth reviews of documents produced by the FTC and records obtained directly  
19 from financial institutions and third-party service providers.

20 Additionally, the Receiver and his staff expended time investigating multiple  
21 physical locations associated with the Receivership Entities' business operations in  
22 California and Texas. This included conducting physical inspections of two storage  
23 facilities located near Dallas, Texas, and one facility in Auburn, California, as well  
24 as interviewing on-site personnel to better understand the Receivership Entities'  
25 operations. The Receiver also engaged and coordinated with local counsel at  
26 MRTH to facilitate the inspection of a residential address in Miami, Florida, then  
27 believed to be defendant Basta's primary residence.

28

1 Furthermore, in an effort to obtain critical information relating the business  
2 and financial activities of the Receivership Entities, the Receiver prepared and  
3 transmitted turnover letters with copies of the Initial Appointment Order to over  
4 thirty (30) financial institutions or other entities of interest, some of which were  
5 identified as holding receivership funds, and others believed to be administering  
6 active accounts in the name or for the benefit of the Receivership Entities or the  
7 Individual Defendants. Detailed summaries of the work performed by the Receiver  
8 are attached hereto as **Exhibit 1** in the form of the Receiver's monthly invoices,  
9 which contain the billing entries detailing the tasks performed by the Receiver and  
10 his staff during the Application Period.

11 Perhaps most importantly, the Receiver established a link for this matter on  
12 his website, [www.fedreceiver.com](http://www.fedreceiver.com), through which he continues to communicate  
13 regularly with affected Entity customers, providing copies of materials filed in this  
14 action, answering customer inquiries, and providing critical notices of suspected  
15 fraudulent efforts by pre-receivership Entity personnel to defraud customers. The  
16 website also includes a portal for customers and other interested parties to upload  
17 materials for the Receiver's review and consideration.

18 The Receiver's efforts have proved successful. He has preserved the *status*  
19 *quo*, engaged in dialogue with customers, and prevented further harm by alerting  
20 customers to suspected efforts to defraud. With respect to his investigative and asset  
21 recovery efforts, as of the date of the filing of this Application, the Receiver has  
22 successfully recovered thousands of pages of relevant financial documents, and  
23 approximately \$1.8 million in value for the benefit of the Estate and its creditors.  
24 Asset recovery efforts continue.

25 The Receiver's staff has also communicated with numerous allegedly  
26 defrauded consumers who have provided substantial relevant information regarding  
27 the Receivership Entities to the Receiver and counsel for the Regulators. These  
28 cooperating consumers have supplied records of the Receivership Entities'

1 communications with them and shared information that appears to corroborate many  
2 of the allegations in the Complaint initiating the above-entitled action, particularly  
3 concerning the defendants' allegedly fraudulent business activities. Additionally,  
4 these consumers have provided evidence identifying other individuals and entities  
5 that may have contributed to the alleged scheme. This information, combined with  
6 other evidence obtained by the Receiver, has been critical to the Receiver's  
7 preliminary finding that the Receivership Entities' business operations are neither  
8 sustainable nor viable as a going concern.

9 The Receiver's conclusions and recommendations are further detailed in the  
10 two Reports – and their associated supplements – that he has filed in this matter to-  
11 date.

12 **V. ALLEN MATKINS' FEES AND EXPENSES.**

13 **A. The Receiver's Engagement of Allen Matkins.**

14 Allen Matkins was retained by the Receiver concurrently with his  
15 appointment. The Receiver selected Allen Matkins as his lead receivership counsel  
16 due to the firm's extensive experience and expertise in federal equity receivership  
17 matters, including matters where the relevant enforcement action was prosecuted by  
18 the FTC. (*See* Donell Decl. ¶¶ 7, 8.) Allen Matkins has served as counsel to federal  
19 equity receivers in dozens of cases, has represented a variety of constituents in  
20 similar bankruptcy and creditors' rights matters, and has significant substantive  
21 experience in related areas, including bankruptcy and real estate. (*See* del Castillo  
22 Decl. ¶ 2.)

23 **B. Services Rendered During the Application Period.**

24 During the Application Period, Allen Matkins extensively assisted the  
25 Receiver in the performance of his duties, including by assisting in his investigation,  
26 document recovery, and asset location and recovery efforts. Overall, on account of  
27 its services rendered during the Application Period, Allen Matkins billed  
28 216.4 hours, for a total of \$145,013.85 in fees, across the following work categories:

Category	Hours	Fees
General Receivership	65.7	\$43,056.00
Asset Recovery & Management	45.2	\$32,769.00
Investigation/Reporting	102.5	\$66,823.65
Consumer/Creditors Issues & Communication	3.0	\$2,365.20
<b><u>TOTAL:</u></b>	<b>216.4</b>	<b>\$145,013.85</b>

Provided below are narrative summaries of the work performed under each of the above categories, and attached hereto as **Exhibit 2** are Allen Matkins' monthly invoices, containing the billing entries detailing the tasks performed by the firm's attorneys and staff during the Application Period.

Allen Matkins endeavored to staff each task efficiently, using a core team of attorneys, with specialized assistance as necessary. Again, Allen Matkins also agreed to discount its ordinary billing rates by 10% for the duration of this matter, as well as to apply a rate freeze for all attorneys and paralegals during the pendency of the above-entitled action.

1. General Receivership.

In connection with the "General Receivership" category of work, Allen Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
David Zaro	Partner	\$1,102.50	0.6	\$661.50
Joshua del Castillo	Partner	\$805.50	33.3	\$26,823.15
Matthew Pham	Associate	\$616.50	1.8	\$1,109.70
Alphamorlai Kebeh	Associate	\$549.00	20.6	\$11,309.40
Madeline Stefani	Law Clerk	\$315.00	6.9	\$2,173.50
Michelle Pendleton	Paralegal	\$391.50	2.1	\$822.15
Simona Peng	Paralegal	\$391.50	0.3	\$117.45
John Kaup	Paralegal	\$391.50	0.1	\$39.15
<b><u>TOTAL:</u></b>			<b>65.7</b>	<b>\$43,056.00</b>

The services in this category generally relate to work at the initial stages of the case. Allen Matkins personnel (a) reviewed pleadings and identified and addressed critical case administration matters; (b) conferred extensively with the FTC, the Receiver, and his professionals in order to develop the Receiver's document recovery, review, and analysis strategy; (c) prepared and filed notices of the Receiver's appointment pursuant to 28 U.S.C. § 754; (d) prepared multiple notices of designation of non-parties as Receivership Entities, identifying four (4) entities confirmed to have sufficient connections to the defendants to be considered Receivership Entities; and (e) prepared demand letters shuttering Receivership Entity websites and demanding the cessation of continued solicitation communications from suspected former Receivership Entity employees.

2. Asset Recovery & Management.

In connection with the "Asset Recovery & Management" category of work, Allen Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$805.50	31.8	\$25,614.90
Matthew Pham	Associate	\$616.50	1.9	\$1,171.35
Alphamorlai Kebeh	Associate	\$549.00	9.4	\$5,160.60
Michelle Pendleton	Paralegal	\$391.50	0.3	\$117.45
John Kaup	Paralegal	\$391.50	1.8	\$704.70
<b><u>TOTAL:</u></b>			<b>45.2</b>	<b>\$32,769.00</b>

The services in this category generally relate to the Receiver's efforts to ensure compliance with the asset freeze entered as part of the Initial Appointment Order and to obtain the prompt turnover of assets and records relevant to the receivership. Allen Matkins personnel (a) prepared and transmitted notices of the Initial Appointment Order to banks and other financial institutions requesting the

turnover of appropriate assets and records; (b) conducted legal analysis of disputes relating to the turnover of identified Receivership assets, resulting in the turnover of over \$275,000, and the successful freezing of what proved to be another \$400,000<sup>3</sup>; (c) attended to matters relating to the potential recovery of real property assets or equity belonging to the Receivership Entities; (d) coordinated with the Receiver to refine his asset recovery strategy, including with respect to real properties subsequently turned over to the Receiver; and (e) attended to various issues arising in connection with the Receiver's physical inspection of locations linked to the Receivership Entities, including conferring with representatives for warehouse facilities located in Texas regarding an assessment of Receivership Entity inventory located therein and a legal analysis of resulting matters.

### 3. Investigation & Reporting.

In connection with the "Investigation & Reporting" category of work, Allen Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$805.50	40.3	\$32,461.65
Matthew Pham	Associate	\$616.50	8.5	\$5,240.25
Alphamorlai Kebeh	Associate	\$549.00	52	\$28,548.00
Madeline Stefani	Law Clerk	\$315.00	1.2	\$378.00
Simona Peng	Paralegal	\$391.50	0.5	\$195.75
<b><u>TOTAL:</u></b>			<b>102.5</b>	<b>\$66,823.65</b>

The services in this category generally relate to the Receiver's investigation of the business and financial activities of the Receivership Entities and their principals and agents. Among other things, Allen Matkins devoted significant time during the Application Period to (a) preparing and serving at least twenty-five (25) document subpoenas in connection with the Receiver's asset recovery and document review

<sup>3</sup> Since turned over to the Receiver in accordance with the Turnover Order.



and analysis efforts, reviewing records produced pursuant to such subpoenas, and conferring with representatives for financial institutions to resolve issues regarding the form and manner of production; (b) reviewing materials produced to the Receiver in response to other document requests; (c) coordinating extensively with the Receiver and his Professionals to identify additional subpoena and demand letter targets; (d) analyzing and following up on documents transmitted to the Receiver by persons of interest, including defendants Basta and Leung, apparent Receivership Entity affiliate Kristi Crowley, and Hart David Carson, former counsel for certain of the defendants; (e) working with the Receiver to identify accounts related to Receivership Entity transactions, both ordinary and suspect; (f) preparing pleadings in compliance with the Receiver's reporting obligations; and (g) conducting legal analysis regarding title to real properties in which the Estate might claim an interest.

4. Consumer/Creditor Issues & Communications.

In connection with the "Consumer/Creditor Issues & Communications" category of work, Allen Matkins personnel billed the following time and fees during the Application Period:

Timekeeper	Position	Hourly Rate	Hours	Fees
Joshua del Castillo	Partner	\$805.50	2.8	\$2,255.40
Alphamorlai Kebeh	Associate	\$549.00	0.2	\$109.80
<b><u>TOTAL:</u></b>			<b>3.0</b>	<b>\$2,365.20</b>

The services in this category relate to Allen Matkins' communications with alleged consumer victims, a number of whom contacted Allen Matkins, rather than the Receiver, following their being notified by the Receiver of the pendency of the receivership. Following initial communications, Allen Matkins directed consumers to the Receiver's office, which remains primarily responsible for engaging in such communications and consumer outreach.

1 VI. **MRTH'S FEES.**

2 A. **The Receiver's Retention Of MRTH.**

3 MRTH was retained by the Receiver at the outset of the above-entitled action.  
4 The Receiver selected MRTH as his local Florida counsel due to MRTH's reputation  
5 in the Miami legal community and its familiarity with local policies and procedures  
6 potentially applicable to the administration of the Estate. (Donell Decl. ¶¶ 7, 8.)

7 B. **Services Rendered by MRTH.**

8 During the Application Period, MRTH provided important local counsel  
9 support to the Receiver in connection with a site visit to a residential address in  
10 Miami, Florida, believed to be defendant Basta's primary residence, in the hopes of  
11 obtaining the turnover of materials and information falling within the ambit of the  
12 turnover provisions of the Initial Appointment Order.

13 A complete description of the services rendered by MRTH can be found in  
14 the invoices collectively appended hereto as **Exhibit 3**.

15 By way of summary, MRTH attorneys billed the following amounts each  
16 month during the Application Period:

17

<b><u>Month</u></b>	<b><u>Total Fees Billed</u></b>
September 2024	\$3,000.00
October 2024	\$0.00
<b><u>TOTAL:</u></b>	<b>\$3,000.00</b>

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22 VII. **RSB'S FEES AND EXPENSES.**

23 A. **The Receiver's Retention Of RSB.**

24 RSB was retained by the Receiver concurrently with his appointment under  
25 the Initial Appointment Order, at the outset of the above-entitled action. The  
26 Receiver selected RSB as his local Texas counsel due to RSB's reputation in the  
27  
28

1 Dallas legal community and its familiarity with local policies and procedures  
2 potentially applicable to the administration of the Estate. (Donell Decl. ¶¶ 7, 8.)

3 **B. Services Rendered by RSB.**

4 During the Application Period, RSB provided critical local counsel support to  
5 the Receiver, largely in connection with the Receiver's inspection of one of the  
6 warehouse facilities located in Dallas, Texas (the "Warehouse"). Among other  
7 things, RSB coordinated with the Receiver and local law enforcement to effectuate  
8 the initial takeover of the Warehouse, inspected the property and took photos of  
9 potentially relevant evidence, and served as a liaison between the Receiver and the  
10 Warehouse's management team.

11 A complete description of the services rendered by RSB can be found in the  
12 invoices collectively appended hereto as **Exhibit 4**.

13 By way of summary, RSB attorneys and staff billed the following amounts  
14 each month during the Application Period:

<u>Month</u>	<u>Total Fees Billed</u>
September 2024	\$19,485.00
October 2024	\$832.50
<b><u>TOTAL:</u></b>	<b>\$20,317.50</b>

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20 **VIII. SL BIGGS' FEES AND EXPENSES**

21 **A. The Receiver's Retention Of SL Biggs.**

22 SL Biggs was initially retained by the Receiver upon his appointment under  
23 the Initial Appointment Order. The Receiver selected SL Biggs as his forensic  
24 accountant due to SL Biggs' exceptional expertise in forensic analysis, which has  
25 made the firm an invaluable asset for the Receiver in a number of prior  
26 engagements, to say nothing of the complex network of Receivership Entities and  
27 related financial accounts involved in this matter. (Donell Decl. ¶¶ 7, 8.)  
28

**B. Services Rendered by SL Biggs.**

During the Application Period, SL Biggs provided vital investigative and analytical support to the Receiver, primarily focusing on asset tracing and assessments of financial accounts held by or for the benefit of the Receivership Entities. SL Biggs conducted comprehensive analyses of financial accounts to track cash flows between the Receivership Entities and third parties, as well as detect potential misappropriations of consumer funds. SL Biggs merged data from various sources, including bank statements, wire details, and transaction records, with data provided by the FTC and third parties subject to subpoenas issued by Allen Matkins. SL Biggs' thorough examination uncovered significant transactions across various entities related to the defendants and has laid the groundwork for ongoing asset recovery efforts.

By way of summary, SL Biggs personnel billed the following amounts each month during the Application Period:

<u>Month</u>	<u>Total Fees Billed</u>
September 2024	\$19,771.50
October 2024	\$50,565.50
<b><u>TOTAL:</u></b>	<b>\$70,337.00</b>

A complete description of the services rendered by SL Biggs can be found in the invoices collectively appended hereto as **Exhibit 5**.

**IX. THE FEES AND EXPENSES INCURRED ARE REASONABLE AND SHOULD BE ALLOWED.**

The Receiver his Professionals respectfully submit that the fees and expenses they incurred during the Application Period are reasonable, and should be allowed and paid, in full. Moreover, as reflected in the concurrently submitted Declaration of Stephen J. Donell, the Receiver has determined, in his reasonable business judgment, that the services for which fees and expenses were incurred were fair,

1 reasonable, necessary, and significantly benefited the Estate. (Donell Decl. ¶ 9.)  
2 Indeed, as reflected in the Receiver's Reports and their supplements, these efforts  
3 minimized further consumer harm, led to the production of numerous critical  
4 documents, and the recovery of approximately \$1.8 million in value for the benefit  
5 of the Estate. In short, the work undertaken during the Application Period laid the  
6 groundwork for the administration of the receivership going forward, has already  
7 resulted in the successful turnover of Estate assets, and identified additional valuable  
8 assets subject to turnover to the Receiver. Accordingly, the Receiver reaffirms his  
9 request that the Court approve the fees and expenses requested and authorize him to  
10 make payment in full thereof.

11 X. **CONCLUSION.**

12 For the foregoing reasons, the Applicants respectfully request that this Court  
13 enter an order:

- 14 1. Granting this Application in its entirety;
- 15 2. Approving the Receiver's fees incurred during the Application Period,  
16 the respective amount of \$69,897.15;
- 17 3. Approving Allen Matkins' fees incurred during the Application Period,  
18 in the amount of \$145,013.85;
- 19 4. Approving MRTH's fees incurred during the Application Period, in the  
20 amount of \$3,000.00;
- 21 5. Approving RSB's fees incurred during the Application Period, in the  
22 amounts of \$20,317.50;
- 23 6. Approving SL Biggs' fees incurred during the Application Period, in  
24 the amount of \$70,337.00; and

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1           7.       Authorizing the Receiver to pay himself and his Professionals the  
2 above-approved fees and expenses, in full, from the funds of the Estate.

3  
4 Dated: March 13, 2025

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
JOSHUA A. DEL CASTILLO  
MATTHEW D. PHAM  
ALPHAMORLAI L. KEBEH

7  
8 By:           /s/          Joshua A. del Castillo          

JOSHUA A. DEL CASTILLO  
Attorneys for Receiver  
STEPHEN J. DONELL

# EXHIBIT 1





Stephen J. Donell, Receiver  
12121 Wilshire Blvd., Suite 1120  
Los Angeles, CA 90025  
Phone: (310) 207-8481 Fax: (310) 207-3483  
www.fedreceiver.com

### Invoice # 2003

October 25, 2024

Interested Parties and Attorneys of Record

RE: **FTC v. Ascend Capventures Inc., et al.**  
**Case No. 2:24-CV-07660-SPG-JPR**

INVOICE TOTAL: **\$45,709.85**

### Professional Services

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/13/2024	SD	Review plaintiff's Federal Trade Commission exhibits volume X; confer with Brian Landau, CPA	0.60	450.00 /hr	270.00
9/13/2024	SD	Travel to meet with FTC in Los Angeles; deliver documents to Receiver's counsel for imaging; confer with counsel	1.40	450.00 /hr	630.00
9/13/2024	SD	Obtain documents from FTC; coordinate copying with counsel; perform preliminary review of documents	1.30	450.00 /hr	585.00
9/13/2024	SD	Review and respond to email from Jody Goodman, Esq. re: receipt of Order Appointing Receiver; confer with Receiver's proposed counsel	0.10	450.00 /hr	45.00
9/13/2024	SD	Review minute order and order appointing receiver filed under seal; confer with receiver team; perform online research re: Defendants; confer with proposed CPA	1.50	450.00 /hr	675.00
9/13/2024	SD	Reach out to Texas counsel re: potential retention; confer with receiver's general counsel	0.30	450.00 /hr	135.00
9/14/2024	SD	Coordinate with Elluma re: case background, need for services; provide copy of order appointing receiver	0.40	450.00 /hr	180.00
9/14/2024	SD	Coordinate with Florida receiver's agent re: Miami activity re: takeover process	0.30	450.00 /hr	135.00
9/14/2024	SD	Review and respond to numerous emails to and from FTC, Receiver's counsel, Receiver's CPA, Receiver's staff re: take-over issues, strategy, Miami and Texas operations	1.70	450.00 /hr	765.00
9/14/2024	SD	Perform online research re: company operations	0.10	450.00 /hr	45.00
9/15/2024	SD	Numerous emails to and from receiver's counsel and FTC re: takeover, initial steps, PI Hearing; case status	1.00	450.00 /hr	450.00
9/15/2024	SD	Travel to Sacramento area in preparation for Take-Over	2.50	450.00 /hr	1,125.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/15/2024	SD	Numerous emails to and from Jason Binford, Esq. review draft engagement agreement	0.40	450.00 /hr	180.00
9/15/2024	SD	Coordinate with Texas and Miami receiver agents re: next steps	0.70	450.00 /hr	315.00
9/15/2024	SD	Travel to Sacramento re: initial takeover; meeting with FTC	2.00	450.00 /hr	900.00
9/15/2024	SD	Research Dallas Receiver's agent; confer with Alan Rosenberg/FTC; discussion with Jason Binford, Esq.; follow up emails re: Grand Prairie, TX take-over location	1.20	450.00 /hr	540.00
9/15/2024	SD	Discussion with Jason Binford, Esq. re: Texas Take-over, case background	0.20	450.00 /hr	90.00
9/15/2024	SD	Travel to Sacramento/Auburn - bill partial time only	1.80	450.00 /hr	810.00
9/15/2024	SD	Prepare letter of authority re: Alan Rosenberg, Esq. re: Miami work; confer and coordinate with Rosenberg re: take-over	0.60	450.00 /hr	270.00
9/15/2024	SD	Zoom with Texas agent and FTC re: Monday operations; follow up emails	0.50	450.00 /hr	225.00
9/16/2024	SD	Meet with FTC and local law enforcement; perform takeover; review documents and computers at Auburn Office; confer with counsel, CPA, Receiver Team	8.00	450.00 /hr	3,600.00
9/16/2024	SD	Review electronic version of pleadings/documents provided by FTC; review Sealed Order Appointing Receiver; confer with counsel and Receiver administrators	4.60	450.00 /hr	2,070.00
9/16/2024	SD	Meet with local law enforcement in Auburn CA, perform business inspection, interview employees, coordinate with FTC, counsel and Receiver team re: Miami and Dallas operations; coordinate with FTC IT professionals re computer and email downloading ; numerous discussions with Receiver's counsel and CPA re: document review/analysis	5.00	450.00 /hr	2,250.00
9/16/2024	SD	Confer with receiver administrator re: fiduciary tax ID number for the receivership estate	0.10	450.00 /hr	45.00
9/16/2024	SB	Prepare demand letters to Bank of America and Bill.com, discuss with Receiver, deliver Bank of America letter to Ocean Park branch. Research service of process for Bill.com, outgoing call to agent. Send Bill.com via FedEx.	1.80	365.00 /hr	657.00
9/16/2024	SB	Review order re appointment temporary receiver, freeze order, and temporary restraining order.	0.30	365.00 /hr	109.50
9/16/2024	SD	Discussion with Brian Landau, CPA re: asset schedules/password sharing issues	0.20	450.00 /hr	90.00
9/17/2024	SB	Call with Brian Landau to discuss transaction report provided by FTC.	0.30	365.00 /hr	109.50

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/17/2024	SB	Prepare turnover demand letter to First Foundation Bank, send to Brian Landau to serve local branch.	0.20	365.00 /hr	73.00
9/17/2024	SB	Revise Truist Bank demand letter per discussion with Josh Del Castillo, send to Receiver.	0.20	365.00 /hr	73.00
9/17/2024	SB	Research Trust Bank, outgoing call to Receiver to discuss, prepare demand for turnover letter, send to Receiver.	0.50	365.00 /hr	182.50
9/17/2024	SB	Set up case on FedReceiver website, provide case summary.	0.30	365.00 /hr	109.50
9/17/2024	SB	Prepare turnover demand letters to Wells Fargo and JP Morgan Chase Bank, serve branches personally.	1.50	365.00 /hr	547.50
9/17/2024	SD	Review additional documents provided by the FTC	2.00	450.00 /hr	900.00
9/17/2024	SB	Online search for website associated with Defendant Ascend Capventures, email to Elluma re takeover of website.	0.40	365.00 /hr	146.00
9/17/2024	SB	Video conference with Brian Landau, Sam Biggs, Deidre Brou and Tyler Broom to discuss accounting and reporting.	0.50	365.00 /hr	182.50
9/17/2024	SD	Travel to Dallas	2.00	450.00 /hr	900.00
9/17/2024	SD	Perform Texas take-over; interview onsite personnel. coordinate with local Texas Receiver agents and FTC; confer with Receiver's counsel	6.00	450.00 /hr	2,700.00
9/18/2024	SB	Incoming and return call to Matthew McGoey re Community Federal Bank accounts.	0.20	365.00 /hr	73.00
9/18/2024	SD	Confer with counsel re: Douglas Elliman of California, Inc. letter and underlying real estate; follow up discussion	0.40	450.00 /hr	180.00
9/18/2024	SB	Outgoing call to Brian Landau re tax identification numbers and social security numbers for defendants.	0.20	365.00 /hr	73.00
9/18/2024	SB	Review email response from Community Federal Bank, prepare demand letter, send with court order per their instructions.	0.20	365.00 /hr	73.00
9/18/2024	SB	Review signature cards, begin list of entities/associated tax ID/socials.	0.30	365.00 /hr	109.50
9/18/2024	SB	Download all documents from FTC, review general contents.	1.60	365.00 /hr	584.00
9/18/2024	SB	Outgoing call to Josh del Castillo re real property list.	0.10	365.00 /hr	36.50
9/18/2024	SB	Research APN for real property schedule provided by FTC, send report to Josh Del Castillo.	0.30	365.00 /hr	109.50
9/18/2024	SB	Review emails from Receiver and counsel re real property issue.	0.10	365.00 /hr	36.50

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/18/2024	SB	Per discussion with Brian Landau, email exchange with Josh del Castillo re preservation letter to Intuit, Inc. Research agent for service of process.	0.20	365.00 /hr	73.00
9/18/2024	SB	Download and save asset freeze and preservation letters from FTC. Begin review.	0.40	365.00 /hr	146.00
9/18/2024	SD	Travel from Dallas to Los Angeles; only bill partial time	2.00	450.00 /hr	900.00
9/18/2024	SD	Review and respond to numerous emails to and from the FTC, Receiver's counsel and CPA re: initial take-over, strategy, findings and/or next steps	1.50	450.00 /hr	675.00
9/18/2024	SD	Review additional documents provided by FTC; confer with forensic accountant and Receiver Administrator re: Discovery, subpoenas and/or strategy	2.00	450.00 /hr	900.00
9/18/2024	SD	Confer with counsel and CPA re: take-over process, information learned and next steps; obtain legal advice	1.50	450.00 /hr	675.00
9/18/2024	SD	Review analysis of real estate re: Defendants; review financial analysis time properties to Defendants; follow up discussion and analysis	2.00	450.00 /hr	900.00
9/18/2024	SD	Review draft letter prepared by counsel Re: eXp Realty; follow up discussion	0.30	450.00 /hr	135.00
9/19/2024	SB	Review update from Josh del Castillo re real estate.	0.10	365.00 /hr	36.50
9/19/2024	SB	Send email to receiver, counsel and Brian Landau regarding asset freeze letters sent by the FTC to various financial institutions	0.20	365.00 /hr	73.00
9/19/2024	SD	Discussion with Jonathan Gitlin, Esq. re: Texas take-over, strategy, future work needs; follow up emails	0.30	450.00 /hr	135.00
9/19/2024	SD	Discussion with counsel re: 10-Day report; next steps	0.10	450.00 /hr	45.00
9/19/2024	LQ	Meet with Steve Donell re general accounting and case matters.	0.20	235.00 /hr	47.00
9/19/2024	SD	Zoom with Receiver's team, counsel and FTC team re: initial takeover process, status of case, accounting, assets and additional steps	1.50	450.00 /hr	675.00
9/19/2024	SD	Confer with counsel re: Receiver's preliminary report	0.30	450.00 /hr	135.00
9/19/2024	SD	Confer with counsel re: Brooks Avenue Property/Receivership related issues; Analyze documentation; follow-up analysis by CPA	0.70	450.00 /hr	315.00
9/20/2024	SB	Review and discuss transaction history with Brian Landau. Prepare and send demand letters to Coinbase, Schwab, and UBS Financial.	1.70	365.00 /hr	620.50
9/20/2024	SD	Review cash flow analysis prepared by Brian Landau, CPA re: Eaglemont Capital; follow-up discussion	0.30	450.00 /hr	135.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/20/2024	SD	Review email from Karl Kronenberger, Esq. to FTC; confer with counsel; follow-up communication with FTC	0.30	450.00 /hr	135.00
9/20/2024	SD	To email from Walzon to FTC; confer with counsel and CPA	0.20	450.00 /hr	90.00
9/20/2024	SB	Review and respond to email from Elluma Discovery.	0.10	365.00 /hr	36.50
9/20/2024	SD	Work on content for case Website	0.60	450.00 /hr	270.00
9/20/2024	SD	Review initial draft of Receiver's initial report; provide redline comments; confer with counsel	1.00	450.00 /hr	450.00
9/20/2024	SD	Review and respond to numerous inquiries from consumers	0.60	450.00 /hr	270.00
9/20/2024	SB	Email discussion with receiver, counsel and Brian Landau regarding Eaglemont Capital/demand letters.	0.30	365.00 /hr	109.50
9/20/2024	SD	Review email from Jonathan Gitlin, Esq. re: Receiver's Initial Report; confer with Joshua del Castillo, Esq. re: Report	0.20	450.00 /hr	90.00
9/21/2024	SD	Confer with Elluma re: scope of work	0.20	450.00 /hr	90.00
9/23/2024	SD	Teams with SEC and Joshua del Castillo, Esq. re: case status; Defendants' retention of counsel	0.50	450.00 /hr	225.00
9/23/2024	SB	Return call to consumer Michael Dixon.	0.20	365.00 /hr	73.00
9/23/2024	SB	Update case information on website.	0.50	365.00 /hr	182.50
9/23/2024	SD	Review plaintiff and defendant's stipulation Re: continuance of primary injunction hearing; confer with counsel	0.40	450.00 /hr	180.00
9/23/2024	SD	Review and approve final draft receiver is an initial report	0.60	450.00 /hr	270.00
9/23/2024	SD	Incoming call from consumer.	0.20	450.00 /hr	90.00
9/23/2024	SD	Review financial analysis prepared by forensic accountants; follow-up discussion; confer with counsel, obtain legal advice	1.70	450.00 /hr	765.00
9/24/2024	SB	Prepare demand letter to Bank of America re Global Marketing, serve on bank.	0.80	365.00 /hr	292.00
9/24/2024	SD	Zoom with Ascend Defendant counsel and Receiver's counsel - initial call/Zoom	0.50	450.00 /hr	225.00
9/24/2024	SB	Prepare demand letter to First Foundation Bank re Global Marketing, include account numbers, send to Brian Landau to serve on bank.	0.30	365.00 /hr	109.50
9/24/2024	SB	Research Eastern Recovery Management LLC per email from Landau re \$1,000,000 transfer in 2023. Respond to email with article re lawsuit with Glenwinkle.	0.30	365.00 /hr	109.50
9/24/2024	SB	Outgoing and return call to Matthew McGoey at Community Federal Savings Bank to update obtain re frozen accounts.	0.20	365.00 /hr	73.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/24/2024	SD	Teams meeting with counsel and receiver administrator team re: case status, accounting, take-over process, strategy; real estate ownership	0.50	450.00 /hr	225.00
9/24/2024	SD	Review and analyze property profiles for various properties; confer with counsel and CPA	0.60	450.00 /hr	270.00
9/24/2024	SD	Review email from counsel and attached documentation re: Michigan home/Jeremy Leung; obtain legal advice	0.40	450.00 /hr	180.00
9/24/2024	SB	Call with Receiver, counsel and Brian Landau to discuss real estate transactions, related entities, etc.	0.40	365.00 /hr	146.00
9/24/2024	SB	Teams meeting with Receiver and counsel regarding case status, accounting, take-over process, strategy; real estate ownership	0.50	365.00 /hr	182.50
9/24/2024	SB	Respond to emails from consumers.	0.50	365.00 /hr	182.50
9/25/2024	SB	Email exchange with Eric Robey and Brian LaRock regarding Ascend's various websites.	0.10	365.00 /hr	36.50
9/25/2024	SB	Teams with FTC and Receiver team	0.80	365.00 /hr	292.00
9/25/2024	SB	Email to Antoinette Green at Bank of America re turnover of funds and bank records.	0.10	365.00 /hr	36.50
9/25/2024	SB	Email to Receiver re \$1,000,000 transaction related to Global Marketing and Eastern Recovery Management.	0.20	365.00 /hr	73.00
9/25/2024	SB	Email exchange with Brian Landau re Stripe, research and outgoing call re same.	0.40	365.00 /hr	146.00
9/25/2024	SD	Review and respond to numerous inquiries from consumers	0.40	450.00 /hr	180.00
9/25/2024	SD	Teams with FTC and Receiver team	0.80	450.00 /hr	360.00
9/26/2024	SD	Review and analyze documentation and reports re: Payward Ventures; confer with receiver team and forensic accountant	0.80	450.00 /hr	360.00
9/26/2024	SB	Discussions with Brian Landau via email and phone re MVB Bank and Payward Ventures.	0.40	365.00 /hr	146.00
9/26/2024	SB	Email exchange with Eric Robi re websites in use by Defendants.	0.20	365.00 /hr	73.00
9/26/2024	SB	Email exchange with legal department Schwab Bank.	0.20	365.00 /hr	73.00
9/26/2024	SD	Review and analyze additional documents, bank statements, financial reports provided by FTC and internally created by receiver team	1.40	450.00 /hr	630.00
9/26/2024	SD	Review document production by UBS; confer with Sarah Bates	0.50	450.00 /hr	225.00
9/27/2024	SD	Confer with counsel re: Defense Counsel discussion with receiver's counsel; review emails to and from FTC	0.30	450.00 /hr	135.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
9/27/2024	SD	Review Defendants' document production; confer with CPA and counsel	2.40	450.00 /hr	1,080.00
9/27/2024	SD	Confer with counsel re: legal issues re: 232 grand property	0.30	450.00 /hr	135.00
9/27/2024	SB	Download production from Bank of America re Global Marketing and Ascend, review documents, share with Receiver, counsel, and Brian Landau.	1.40	365.00 /hr	511.00
9/27/2024	SB	Review and respond to email from Legal at Digital Ocean.	0.10	365.00 /hr	36.50
9/27/2024	SB	Research MVB Bank. Prepare and send demand letter to MVB Bank via email.	0.40	365.00 /hr	146.00
9/27/2024	SB	Share website listing with Mo Kebeh, request to include companies on subpoena list.	0.20	365.00 /hr	73.00
9/27/2024	SB	Research Amazon AWS, Hostinger and Digital Ocean. Prepare demand letter to Amazon AWS, Hostinger and Digital Ocean via email.	0.50	365.00 /hr	182.50
9/27/2024	SB	Email exchange with Stephanie Bergmann and Receiver re accounts at UBS Financial.	0.30	365.00 /hr	109.50
9/27/2024	SB	Research service information for Payward Ventures. Prepare and send demand letter via mail.	0.50	365.00 /hr	182.50
9/27/2024	SD	Incoming call from John Sigety, Esq. re: arbitration status of his clients	0.40	450.00 /hr	180.00
9/28/2024	SD	Review arbitration file provided by FTC	0.90	450.00 /hr	405.00
9/29/2024	SD	Review and respond to emails from numerous consumers	0.30	450.00 /hr	135.00
9/30/2024	SD	Confer with counsel re: Global marketing development as or additional receivership entity	0.40	450.00 /hr	180.00
9/30/2024	SD	Review Basta and Leung Interrogatories	0.10	450.00 /hr	45.00
9/30/2024	SB	Email exchange with Digital Ocean re website information.	0.20	365.00 /hr	73.00
9/30/2024	SB	Email exchange with Receiver and counsel re contact with First Foundation Bank and Bank of America.	0.20	365.00 /hr	73.00
9/30/2024	SB	Discussions with Matt Dandurand re subscribers.	0.10	365.00 /hr	36.50
9/30/2024	SD	Discussion with attorney Bennet Kelley, Esq. re: his client (consumer) inventory claim	0.10	450.00 /hr	45.00
<b>For professional services rendered</b>			<b>99.20</b>		<b>\$42,727.00</b>
Additional Charges:					
					<u>Amount</u>
9/15/2024		Airfare from LAX to Sacramento for initial take-over			\$668.94
9/16/2024		Hotel in Auburn			\$219.80



	Amount
9/17/2024 Travel from Sacramento to Dallas, TX - airfare	\$512.48
9/17/2024 Hotel Auburn Texas re: Texas Take-over	\$219.80
9/17/2024 Rental Car Texas - Ace Rental Car	\$459.60
9/17/2024 Rental Car Sacramento - Alamo	\$232.86
9/17/2024 Car rental fee - Texas	\$17.95
9/17/2024 Car rental fee Sacramento	\$17.95
9/17/2024 Airfare Dallas to LAX - Delta	\$633.47
<b>Total additional charges</b>	<b>\$2,982.85</b>
<b>Total amount of this bill</b>	<b>\$45,709.85</b>
<b>Balance Due</b>	<b>\$45,709.85</b>



Stephen J. Donell, Receiver  
12121 Wilshire Blvd., Suite 1120  
Los Angeles, CA 90025  
Phone: (310) 207-8481 Fax: (310) 207-3483  
www.fedreceiver.com

### Invoice # 2028

November 6, 2024

Interested Parties and Attorneys of Record

RE: **FTC v. Ascend Capventures Inc., et al.**  
**Case No. 2:24-CV-07660-SPG-JPR**

INVOICE TOTAL: **\$34,936.50**

### Professional Services

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/1/2024	SB	Research method for service of process for Wise, prepare and send demand letter.	0.60	365.00 /hr	219.00
10/1/2024	SB	Post update on website.	0.20	365.00 /hr	73.00
10/1/2024	SD	Review and analyze email and attachments from Paige M. (consumer); discuss document with CPA/Receiver administrator for further review/analysis.	0.20	450.00 /hr	90.00
10/1/2024	JD	Return call from investor Brian Bowen. Discuss status of case and email a copy of the Receiver's Initial Report to the Court	0.30	365.00 /hr	109.50
10/1/2024	SD	Review email from attorney John Sigety re: Rivard et al. v Ascend et al. ; review the attached statement of claims via AAA; review and analyze; confer with counsel re further investigation	0.60	450.00 /hr	270.00
10/1/2024	SD	Review and analyze data in evidence Re: Global marketing developments; confer with counsel Re: adding as additional receivership entity; review draft notice of designation of non-party; confer with counsel re: value to estate re: additional investigation re: Global marketing development	0.70	450.00 /hr	315.00
10/1/2024	SD	Review and analyze data and information re: Pillsbury and impact on receivership - discuss Intuit data, access, strategy re: accessing data important to the estate	0.40	450.00 /hr	180.00
10/1/2024	SD	Work on website re: FAQ's/messaging	0.20	450.00 /hr	90.00
10/1/2024	SD	Review and analyze documents and information re: Mercury Bank, Evolve Bank & Trust, Choice Bank, Wise US; confer with Brian Landau, CPA	0.70	450.00 /hr	315.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/1/2024	SB	Research method for service of process for Navy Federal Credit Union, attempt to contact by phone, prepare and send demand letter.	0.50	365.00 /hr	182.50
10/1/2024	SB	Research method for service of process for Choice Bank, prepare and send demand letter.	0.50	365.00 /hr	182.50
10/1/2024	SB	Research method for service of process for Evolve Bank, prepare and send demand letter.	0.50	365.00 /hr	182.50
10/1/2024	SB	Email update to team regarding demand letter sent to various fintech companies.	0.20	365.00 /hr	73.00
10/1/2024	SD	Confer with Jason Binford, Esq. re: services/billing; review invoice	0.10	450.00 /hr	45.00
10/1/2024	SB	Follow up email to Choice Bank regarding additional receivership entities.	0.10	365.00 /hr	36.50
10/1/2024	SB	Follow up email to Evolve Bank regarding additional receivership entities.	0.10	365.00 /hr	36.50
10/1/2024	SB	Follow up email to Wise regarding additional receivership entities.	0.10	365.00 /hr	36.50
10/1/2024	SB	Review information received from consumer re Bill.com, email to legal department at Bill.com with original demand, TRO and copy of invoice.	0.40	365.00 /hr	146.00
10/1/2024	SD	Confer with counsel, receiver team, CPA re: Will Basta deposition, emails, documents and records	0.30	450.00 /hr	135.00
10/1/2024	SD	Review and respond to inquiries from numerous consumers	0.50	450.00 /hr	225.00
10/1/2024	SB	Review and forward Pillsbury response to team.	0.20	365.00 /hr	73.00
10/1/2024	SB	Review Mercury turnover, email to team regarding Ben Ralph/signer on accounts.	0.30	365.00 /hr	109.50
10/1/2024	SD	Review documents provided by FTC re: Choice Bank; confer with Receiver team	0.40	450.00 /hr	180.00
10/1/2024	SD	Review and respond to numerous emails from FTC; review attachments RE correspondence and/or attachments received by defendants; investigate Mercury/Choice Financial and Bill.com issues	0.40	450.00 /hr	180.00
10/1/2024	SD	Review and respond to numerous emails from FTC re: Defendant/company/employee issues	0.40	450.00 /hr	180.00
10/1/2024	SD	Review and approve draft letter from receiver's counsel to Karl Kronenberger, Esq. re: notice of receivership appointment; concerns re: continuation of bills being sent to consumers; confer with counsel	0.20	450.00 /hr	90.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/2/2024	SD	Review production from Stephanie Bergmann of UBS; confer with Brian Landau, CPA and Sarah Bates re: value to the receivership estate, strategy re: further review, additional subpoenas, additional money-tracing	0.80	450.00 /hr	360.00
10/2/2024	JD	Incoming call from Lawrence, investor, regarding the status of the case. Send email with copy of Receiver's Initial Report to the court.	0.30	365.00 /hr	109.50
10/2/2024	LQ	Review Order Appointing Receiver to determine requirements re accounting and reporting	0.20	235.00 /hr	47.00
10/2/2024	SD	Confer with counsel Re: Bank of America/Global Marketing Development; discuss legal strategy re: accounts, asset recovery	0.30	450.00 /hr	135.00
10/2/2024	SB	Return call to Tabatha Wallace at MVB Bank	0.10	365.00 /hr	36.50
10/2/2024	SB	Provide link to Chase documents to Brian Landau.	0.10	365.00 /hr	36.50
10/2/2024	SB	Email exchange with paralegal at USB re production/password.	0.20	365.00 /hr	73.00
10/2/2024	SB	Download, review and discuss production documents from Schwab with Brian Landau.	0.50	365.00 /hr	182.50
10/2/2024	SB	Email to Receiver and Brian Landau re Navy Federal Credit Union, attach demand letter.	0.10	365.00 /hr	36.50
10/2/2024	SD	Perform drive-by inspection of Santa Monica/Venice properties potentially related to Defendants	0.50	450.00 /hr	225.00
10/2/2024	SD	Confer with counsel re: Strategy re: preservation letter to Ben Ralph; next steps needed to benefit the receivership estate	0.30	450.00 /hr	135.00
10/3/2024	SB	Contact with Wio Bank, prepare and send demand letter per discussion with customer service.	0.90	365.00 /hr	328.50
10/3/2024	SB	Call with MVB Bank, email to Brian Landau with update.	0.40	365.00 /hr	146.00
10/3/2024	SB	Research delivery method, prepare and send demand letter to Crypto.com.	0.40	365.00 /hr	146.00
10/3/2024	SB	Review and respond to email from Mo Kebeh regarding Bank of America, attach correspondence.	0.20	365.00 /hr	73.00
10/3/2024	SB	Email exchange with Joshua Carlson at Choice Financial Bank.	0.20	365.00 /hr	73.00
10/3/2024	SB	Review turnover documents from UBS.	1.20	365.00 /hr	438.00
10/3/2024	SB	Review response from Community Federal Savings Bank. Email to team regarding contact with Currency Cloud, Airwallex, etc, comment on new entity Selva Enterprises LLC	0.30	365.00 /hr	109.50

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/3/2024	SB	Email exchange with Brian Landau regarding UBS documents. Research Barclays Bank method for service of process.	0.30	365.00 /hr	109.50
10/3/2024	SB	Discussion with team re various issues.	0.50	365.00 /hr	182.50
10/3/2024	SB	Email discussion with team re Amex payments, real property.	0.40	365.00 /hr	146.00
10/3/2024	SD	Review and respond to numerous inquiries from consumers	0.30	450.00 /hr	135.00
10/3/2024	SD	Review correspondence from CFSB - Community Federal Savings Bank; confer with CPA and Receiver team re: next step, further analysis re asset recovery	0.40	450.00 /hr	180.00
10/3/2024	SD	Review Bank of America Document Production	0.40	450.00 /hr	180.00
10/3/2024	SD	Review Defendants' 1st, 2nd and 3rd production; confer with CPA, Sarah Bates, Receiver counsel re: strategy, next steps, information of value to the estate	1.50	450.00 /hr	675.00
10/3/2024	SD	Discuss legal strategy with counsel re: American Express	0.20	450.00 /hr	90.00
10/3/2024	SD	Review and respond to emails from FTC Re: document production re: imaged documents, privilege issues	0.20	450.00 /hr	90.00
10/3/2024	SD	Review and approve Summons Proof of Service; numerous emails with Elsie Kappler, FTC	0.10	450.00 /hr	45.00
10/4/2024	SB	Review and respond to email from Kraken legal.	0.20	365.00 /hr	73.00
10/4/2024	SD	Review order granting continuance of preliminary injunction hearing an extension of TRO; confer with counsel	0.10	450.00 /hr	45.00
10/4/2024	SD	Review and analyze information Re: Linden Avenue property and Granite escrow; confer with CPA	0.30	450.00 /hr	135.00
10/4/2024	SD	Confer with receiver team/counsel Re: discovery strategy, exiting targets, status of document production; obtain legal advice	0.30	450.00 /hr	135.00
10/4/2024	SD	Review and analyze Larchmont Escrow Documents re: Linden Avenue re: value/recovery to estate; review additional supporting documents; confer with CPA re: money tracing	0.70	450.00 /hr	315.00
10/4/2024	SB	Email follow up to UBS Financial.	0.10	365.00 /hr	36.50
10/7/2024	SB	Review email from Hostinger re TRO expiration, request TRO extension from counsel, forward order continuing preliminary injunction and TRO to Hostinger.	0.20	365.00 /hr	73.00
10/7/2024	SD	Confer with counsel.	0.20	450.00 /hr	90.00
10/7/2024	SB	Email exchange re list of pending subpoenas with counsel.	0.20	365.00 /hr	73.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/7/2024	SD	Review and approve draft letter from counsel to to Granite Escrow re: possible asset recovery; confer with counsel	0.30	450.00 /hr	135.00
10/7/2024	SB	Follow up email to Joshua Carlson	0.10	365.00 /hr	36.50
10/7/2024	SB	Review and respond to email from Hostinger. Request extension of TRO order from counsel. Forward to Hostinger.	0.30	365.00 /hr	109.50
10/7/2024	SB	Research websites, review email from Eric Robi, send email to Receiver re status.	0.40	365.00 /hr	146.00
10/7/2024	SB	Email exchange with consumer re contact in Pakistan.	0.20	365.00 /hr	73.00
10/7/2024	SB	Send email response to law enforcement at kraken.com.	0.10	365.00 /hr	36.50
10/7/2024	SB	Send email response to law enforcement at Crypto.com.	0.10	365.00 /hr	36.50
10/7/2024	SD	Review and respond to numerous inquiries from consumers; return numerous phone calls from consumers	0.30	450.00 /hr	135.00
10/7/2024	SB	Review and discuss consumer submissions with Receiver.	0.20	365.00 /hr	73.00
10/7/2024	SB	Incoming call from consumer. Referred to website.	0.20	365.00 /hr	73.00
10/7/2024	SB	Email exchange with counsel re subpoena list/Barclays.	0.20	365.00 /hr	73.00
10/8/2024	SB	Save turnover documents from Hostinger. Review and forward documents to team with comments.	0.50	365.00 /hr	182.50
10/8/2024	SB	Review turnover from Kraken, email Receiver re UAE residency/Leung. Forward access emails to Brian Landau.	1.30	365.00 /hr	474.50
10/8/2024	SD	Confer with Receiver's counsel re: status of Leung deposition, asset recovery strategy	0.40	450.00 /hr	180.00
10/9/2024	SD	Review email and extensive attachments from D. Shelton, consumer; confer with CPA - analyze banking documents re: value to estate re additional fund tracing	0.50	450.00 /hr	225.00
10/10/2024	SB	Download and save Choice Financial Bank production, share with team.	0.40	365.00 /hr	146.00
10/10/2024	SB	Post update on website.	0.20	365.00 /hr	73.00
10/10/2024	SB	Review Choice Financial Bank turnover documents.	1.00	365.00 /hr	365.00
10/10/2024	SB	Email exchange with Joshua Carlson at Choice Financial Bank.	0.20	365.00 /hr	73.00
10/10/2024	SB	Obtain tax identification number at irs.gov. Save and share with accounting.	0.30	365.00 /hr	109.50
10/10/2024	SD	Review and analyze documents and information re: Paradyme, Chase Bank; confer with CPA Re: forensic accounting, money tracing and asset recovery efforts	0.50	450.00 /hr	225.00

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	
10/10/2024	SD	Review and analyze data and information re: Quickbooks; confer with receiver team, CPA and receiver's counsel; review follow-up email exchange between receiver's counsel and FTC re: Quickbooks, Granite Escrow	0.40	450.00 /hr	180.00
10/10/2024	SD	Review and approve draft letter from counsel to Beverly Woolf of First American re: Granite Escrow production; follow up discussion with counsel	0.10	450.00 /hr	45.00
10/10/2024	SD	Review status of document subpoenas, document production to Receiver; strategize with Receiver team/CPA re: next steps re: asset recovery, forensic accounting funds tracing, possible overseas transfer of funds by Defendants	0.70	450.00 /hr	315.00
10/11/2024	SB	Follow up email to legal department at UBS Financial regarding lack of response. Discuss with receiver.	0.20	365.00 /hr	73.00
10/11/2024	SD	Review NFCU Production; discuss with Brian Landau re: immediate next steps, strategy, money tracing	1.00	450.00 /hr	450.00
10/11/2024	SD	Review documents and information Re: AC Ventures; confer with receivership team Re: next steps, cost-benefit analysis to receivership estate	0.70	450.00 /hr	315.00
10/11/2024	SD	Review and respond to emails from Nikita Loktev re: Walzon Texas Warehouse; discuss inventory with counsel and CPA; obtain legal advice Re: next steps and cost-benefit analysis to the receivership estate	0.70	450.00 /hr	315.00
10/11/2024	SB	Email exchange with Team regarding crypto.com. Forward original demand letter via email.	0.30	365.00 /hr	109.50
10/11/2024	SB	Review email from Brian Landau. Research records regarding Paradym capital and Bank of America. Create link and send in response email.	0.50	365.00 /hr	182.50
10/11/2024	LQ	Open bank account.	0.50	235.00 /hr	117.50
10/11/2024	SD	Discussion with Joshua del Castillo, Esq. re: Texas operations	0.20	450.00 /hr	90.00
10/13/2024	SD	Review and respond to email from Nikita L. re: Walzon; review attached lease, emails; follow up discussion with receiver's counsel	0.20	450.00 /hr	90.00
10/14/2024	SB	Email follow-up to Choice Bank.	0.10	365.00 /hr	36.50
10/14/2024	SB	Email to Brian Landau re transfers to Wio Bank (UAE).	0.10	365.00 /hr	36.50
10/14/2024	SB	Call with Theodore Wills, counsel for UBS. Discuss turnover.	0.40	365.00 /hr	146.00
10/14/2024	SB	Call with Brian Landau re UBS and other transactions.	0.40	365.00 /hr	146.00
10/14/2024	SB	Email follow-up to Wise legal	0.10	365.00 /hr	36.50



			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/14/2024	SB	Review and respond to email from Josh del Castillo regarding Eaglemont and Paradym as receivership entities as it relates to UBS Financial, also discuss Mercury and Choice Bank.	0.20	365.00 /hr	73.00
10/14/2024	SD	Review latest report prepared by Brian Landau, CPA; Teams meeting with FTC, CPA and Receiver's counsel	0.70	450.00 /hr	315.00
10/14/2024	SB	Meeting with Receiver, counsel, Brian Landau and FTC.	0.80	365.00 /hr	292.00
10/15/2024	SD	Review ACV Partners documents and information; strategize with Receiver team re: recovery efforts and cost-benefit analysis	0.70	450.00 /hr	315.00
10/15/2024	SB	Review and respond to email from Josh del Castillo regarding turnover of Kraken/Payward Ventures funds. Follow up email to Legal at Kraken/Payward Ventures	0.20	365.00 /hr	73.00
10/15/2024	SD	Review federal document production; confer with receiver team, CPA and counsel RE next steps and money tracing strategy	0.70	450.00 /hr	315.00
10/15/2024	SB	Review and respond to email from Mo Kebeh regarding list of turnover of funds	0.10	365.00 /hr	36.50
10/15/2024	SB	Discussion with receiver and counsel regarding UBS lines of credit and assets. Draft and send email to Theodore Wills at UBS Financial requesting liquidation of accounts and turn over of cash to receivership estate	0.40	365.00 /hr	146.00
10/15/2024	SB	Review deposition of William Basta.	0.40	365.00 /hr	146.00
10/15/2024	SD	Review Will Basta Depo	0.90	450.00 /hr	405.00
10/15/2024	SD	Review and analyze Eaglemont and Paradyme documents; review draft Designation as Receivership Entities letter prepared by counsel; confer with counsel re: legal strategy	0.80	450.00 /hr	360.00
10/16/2024	SB	Per information provided by Choice Bank, prepare and send demand letter to Mercury legal department.	0.50	365.00 /hr	182.50
10/16/2024	SD	Review AMZ Title LLC documents; discuss with Receiver/CPA team re: strategy , cost benefit analysis	0.30	450.00 /hr	135.00
10/16/2024	SD	Review Leung Depo Transcript	1.20	450.00 /hr	540.00
10/16/2024	SB	Research website info, send email to team re subpoena to Domains by Proxy.	0.40	365.00 /hr	146.00
10/16/2024	SB	Review and discuss 89CLTV transactions with Landau.	0.30	365.00 /hr	109.50
10/16/2024	SD	Review information provided by CPA Re: Paradyme; confer with CPA re: money tracing efforts	0.40	450.00 /hr	180.00

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	
10/16/2024	SB	Discussion with Brian Landau regarding Payward Ventures transactions related to Ether contract and Bitcoin. Forward Ledger to Daniel Clarkson at Payward Ventures asking about those particular transactions and where those funds were going.	0.40	365.00 /hr	146.00
10/16/2024	SD	Review Domains By Proxy, LLC documents; discuss with Receiver team re: strategy , cost benefit analysis	0.30	450.00 /hr	135.00
10/17/2024	SB	Review and provide comments for initial report supplement.	0.30	365.00 /hr	109.50
10/17/2024	SB	Email to Daniel Clarkson re turnover status.	0.10	365.00 /hr	36.50
10/17/2024	SB	Review balances in Mercury accounts, email to team re findings.	0.40	365.00 /hr	146.00
10/17/2024	SB	Email exchange with UBS. Review sworn statement.	0.40	365.00 /hr	146.00
10/17/2024	LQ	Prepare wire instructions; send to Sarah Bates	0.20	235.00 /hr	47.00
10/17/2024	SB	Email exchange with Landau re transactions on Mercury, Ben Ralph connection.	0.30	365.00 /hr	109.50
10/17/2024	SB	Research, draft and send demand letter to Bluevine via email.	0.40	365.00 /hr	146.00
10/17/2024	SB	Review and respond to email from Daniel Clarkson/Payward Ventures.	0.20	365.00 /hr	73.00
10/17/2024	SB	Email to Hostinger re turnover per discussion with IT.	0.40	365.00 /hr	146.00
10/17/2024	SB	Email exchange with team re Wise turnover.	0.20	365.00 /hr	73.00
10/18/2024	SD	Review and respond to numerous inquiries from consumers re: case status	0.40	450.00 /hr	180.00
10/18/2024	LQ	Create new database in Appfolio	0.50	235.00 /hr	117.50
10/18/2024	SB	Email exchange with Daniel Clarkson and Receiver re fees for liquidation of Crypto account.	0.20	365.00 /hr	73.00
10/18/2024	SB	Post court documents on website.	0.10	365.00 /hr	36.50
10/18/2024	SB	Discuss download issues with IT re turnover from website domain.	0.10	365.00 /hr	36.50
10/18/2024	SB	Contact with Mercury's legal department re online access.	0.20	365.00 /hr	73.00
10/18/2024	SB	Transfer funds from multiple Mercury accounts to receivership account.	1.20	365.00 /hr	438.00
10/18/2024	SB	Email exchange with consumer re website.	0.10	365.00 /hr	36.50
10/18/2024	SB	Review email from Brian Landau re Coinbase.	0.10	365.00 /hr	36.50
10/18/2024	SB	Email exchange with Josh del Castillo re Mercury accounts, transfer of cash to receivership bank account.	0.20	365.00 /hr	73.00
10/18/2024	SB	Email exchange with Theo Wills at UBS and Receiver re requested paperwork/turnover.	0.30	365.00 /hr	109.50

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	
10/18/2024	SB	Continue review of Mercury account transactions, email to Mercury re recent transactions.	0.70	365.00 /hr	255.50
10/18/2024	SD	Review Defendant's opposition to Motion for PI; confer with counsel/FTC	0.70	450.00 /hr	315.00
10/18/2024	SD	Review Coinbase documents; confer with CPA and Receiver team	0.60	450.00 /hr	270.00
10/18/2024	SD	Review additional Defendant document production	0.60	450.00 /hr	270.00
10/18/2024	SD	Confer with counsel re: UBS production	0.10	450.00 /hr	45.00
10/19/2024	SB	Review and respond to email from Brian Landau re access to Mercury accounts.	0.10	365.00 /hr	36.50
10/20/2024	LQ	Review bank transactions	0.20	235.00 /hr	47.00
10/21/2024	SD	Teams with FTC and Joshua del Castillo re: Receivership assets, entities, case status	0.50	450.00 /hr	225.00
10/21/2024	SD	Review AC Ventures documents; confer with CPA and counsel RE designation as additional receivership entity; obtain legal advice	0.40	450.00 /hr	180.00
10/21/2024	SD	Review Def's 5th production; confer with CPA	0.70	450.00 /hr	315.00
10/21/2024	SD	Review draft stipulation for preliminary injunction; confer with counsel	0.20	450.00 /hr	90.00
10/21/2024	SD	Review and respond to email from counsel re: UBS document production	0.10	450.00 /hr	45.00
10/21/2024	SB	Review and respond to email from consumer.	0.10	365.00 /hr	36.50
10/21/2024	SB	Review and respond to email from Josh Del Castillo re AC Ventures Global.	0.10	365.00 /hr	36.50
10/21/2024	SB	Email exchange with Brian Landau re Form 56.	0.20	365.00 /hr	73.00
10/21/2024	SB	Review and respond to email and voicemail from representative at Godaddy.com. Attach requested documents.	0.20	365.00 /hr	73.00
10/21/2024	SD	Review GMD's document production; analyze money flow; confer with counsel/CPA re: timing of outflow after TRO; obtain legal advice/strategy	0.70	450.00 /hr	315.00
10/22/2024	SB	Email exchange with Wise regarding instructions on turn over of cash.	0.10	365.00 /hr	36.50
10/22/2024	SB	Research Strawl Goods, found address in Wyoming and Walmart page.	0.20	365.00 /hr	73.00
10/22/2024	SB	Email exchange with Coinbase regarding instructions on turn over of cash.	0.20	365.00 /hr	73.00
10/22/2024	SB	Prepare and send demand letter to Airwallex.	0.30	365.00 /hr	109.50

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	
10/22/2024	SB	Review turnover file for Evolve. Email follow up to Evolve Bank & Trust re additional account.	0.20	365.00 /hr	73.00
10/22/2024	SB	Review production from defendants regarding Slack accounts. Attempt to log in. Send follow-up email to team regarding inability to access accounts.	0.20	365.00 /hr	73.00
10/22/2024	SB	Receipt of package from Federal Trade Commission. Follow up email to Jody Goodman and Elsie Kappler regarding contents. Discussed with Receiver	0.20	365.00 /hr	73.00
10/22/2024	SB	Review Mercury Bank activity. Email follow-up to legal department regarding accounts and Jeremy Leung's access as of October 16th.	0.50	365.00 /hr	182.50
10/22/2024	SB	Follow up email to legal department at Payward Ventures regarding status of turnover	0.10	365.00 /hr	36.50
10/22/2024	SB	Discussion with Brian Landau regarding Mercury transactions. Review transactions related to possible real estate purchases. Email exchange with legal team regarding same.	1.30	365.00 /hr	474.50
10/22/2024	SB	Review bank transactions	0.70	365.00 /hr	255.50
10/22/2024	SB	Email exchange with Mercury re transactions.	0.30	365.00 /hr	109.50
10/22/2024	SB	Prepare and send demand letter to Currency Cloud.	0.40	365.00 /hr	146.00
10/22/2024	SB	Discussion with Brian Landau. Follow up email to Evolve Bank and Trust. Attach court documents - notices of designation of additional receivership entities.	0.40	365.00 /hr	146.00
10/22/2024	SB	Call with Brian Landau to discuss transaction details	0.40	365.00 /hr	146.00
10/22/2024	SB	Prepare and send demand letter to Stripe.	0.30	365.00 /hr	109.50
10/22/2024	SB	Post court documents on website.	0.20	365.00 /hr	73.00
10/22/2024	SB	Send follow up emails to Kraken and Coinbase re turnover.	0.20	365.00 /hr	73.00
10/22/2024	SB	Discussion with Brian Landau. Prepare and send demand letter to Stripe payments.	0.60	365.00 /hr	219.00
10/22/2024	SD	Review Wise US, Inc. document production	0.40	450.00 /hr	180.00
10/22/2024	SB	Review, and respond to email from Josh del Castillo regarding cash turnover to date.	0.20	365.00 /hr	73.00
10/22/2024	SB	Review Wise transaction for Strawl Goods. Email to Legal team regarding findings, transactions related to Food for Good, Bunnie Management, etc.	0.80	365.00 /hr	292.00
10/23/2024	SB	Call with Brian Landau to discuss forensic accounting status, next steps.	1.20	365.00 /hr	438.00
10/23/2024	SB	Review and respond to email from Jody Goodman re UBS.	0.20	365.00 /hr	73.00
10/23/2024	SD	Review Defendant's 6th document production	0.40	450.00 /hr	180.00

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	
10/23/2024	SB	Email to Blanca Cordova re FTC turnover.	0.10	365.00 /hr	36.50
10/23/2024	SB	Discussion with Brian Landau, email to Mercury regarding designation of additional receivership entities.	0.30	365.00 /hr	109.50
10/23/2024	LQ	Prepare financials and interim report.	0.30	235.00 /hr	70.50
10/23/2024	SB	Post updates on website. Email with counsel re same.	0.30	365.00 /hr	109.50
10/23/2024	SB	Prepare summary of cash turnover to date. Save and email to team including Federal Trade Commission	0.20	365.00 /hr	73.00
10/24/2024	SD	Review order extending TRO; confer with counsel	0.10	450.00 /hr	45.00
10/24/2024	SD	Review payables, cash, recovery summary report	0.40	450.00 /hr	180.00
10/24/2024	SB	Email exchange with Brian Landau regarding turnover from Navy Federal Credit Union. Log into FTC's Portal to check turnover documents	0.40	365.00 /hr	146.00
10/24/2024	SB	Review and respond to email from FTC re additional UBS turnover.	0.10	365.00 /hr	36.50
10/24/2024	SB	Provide wire instructions to Wise regarding turnover of funds	0.20	365.00 /hr	73.00
10/24/2024	SB	Discussion with Brian Landau regarding transactions. Follow up emails to Mercury and Wise regarding specific accounts.	0.50	365.00 /hr	182.50
10/24/2024	SB	Email follow-up to Blanca Graham Cordova regarding turnover documents. Discussion with Brian Landau regarding same.	0.20	365.00 /hr	73.00
10/24/2024	SB	Prepare and send demand letter to GoDaddy re ascendetsy.net	0.40	365.00 /hr	146.00
10/24/2024	JD	Incoming call from Chase Hill, investor, to discuss the status of the case. Requested that he register on Receiver's website.	0.20	365.00 /hr	73.00
10/24/2024	SB	Research and confirm receipt of Wire from Kraken/Payward Ventures.	0.20	365.00 /hr	73.00
10/24/2024	SB	Review and respond to email from Landau re Navy Federal Credit Union.	0.10	365.00 /hr	36.50
10/24/2024	SB	Email exchange with team re list of consumers/subscribers to receiver's website.	0.20	365.00 /hr	73.00
10/25/2024	SD	Review Mercury production; confer with CPA and Receiver team	0.70	450.00 /hr	315.00
10/25/2024	SB	Review and respond to email crypto.com. Prepare new demand letter to Foris Dax Inc., send via email.	0.40	365.00 /hr	146.00
10/25/2024	SD	Review and analyze documentation Re: ACV Nexus; confer with forensic accountant and Receiver team	0.50	450.00 /hr	225.00

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/25/2024	SB	Based on new findings regarding websites in use, research and prepare demand letters to 1 and 1 website and Wix.com	0.90	365.00 /hr	328.50
10/25/2024	SB	Review and discuss turnover documents from financial institutions with Brian Landau. Discuss international transfers. Also discuss new website information.	0.80	365.00 /hr	292.00
10/25/2024	SB	Review email from Jody Goodman download and view UBS documents.	0.40	365.00 /hr	146.00
10/25/2024	SB	Research domain information and send letters to 1 and 1 and Wix.com.	0.50	365.00 /hr	182.50
10/25/2024	SD	Review and analyze documents Re: Wix.com - confer with receiver team Re: document subpoena	0.30	450.00 /hr	135.00
10/25/2024	SB	Review production from Airwallex.com. Send response email to Altin Sila at Airwallex.	0.40	365.00 /hr	146.00
10/25/2024	SB	Review email and turnover documents received via email from AirWallex, download to file, send follow up email re zero accounts/transactions.	0.30	365.00 /hr	109.50
10/25/2024	SB	Email to consumer re contact with Malik/Illinois.	0.10	365.00 /hr	36.50
10/25/2024	SB	Download documents from FTC.	0.20	365.00 /hr	73.00
10/25/2024	SB	Review NFCU turnover.	0.20	365.00 /hr	73.00
10/25/2024	SB	Email exchange with Crypto.com law enforcement, draft new letter to Foris Dax, send via email.	0.40	365.00 /hr	146.00
10/25/2024	SB	Review and respond to email from consumer regarding invoice received from Bill.com. Discuss with Brian Landau.	0.70	365.00 /hr	255.50
10/28/2024	SB	Review list of accounts available on Mercury's website. Search for transactions related to Food for Good. Discuss with Brian Landau. Email to Mercury legal department regarding access to Ascend Ecom, Bunnie M, Strawl Goods, and Toogloo.	0.70	365.00 /hr	255.50
10/28/2024	SB	Call with Brian Landau re Cloud Peak.	0.30	365.00 /hr	109.50
10/28/2024	SD	Review Payward Ventures related documents; perform analysis re connection to consumer funds; confer with Receiver team	0.40	450.00 /hr	180.00
10/28/2024	SB	Review turnover from Cloud Peak law. Email to attorneys and receiver regarding transactions, new entities.	1.00	365.00 /hr	365.00
10/28/2024	SB	Per discussion with Brian Landau research Mashreq Bank, attempt to contact by phone, left message.	0.40	365.00 /hr	146.00
10/28/2024	SB	Follow up email to attorneys regarding Payward Ventures	0.10	365.00 /hr	36.50
10/28/2024	SB	Review turnover from Cloud Peak Law. Research new entities.	0.80	365.00 /hr	292.00

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	
10/28/2024	SB	Update list of known websites in use by defendants. Research which websites are still active. Email list to receiver per his request.	0.50	365.00 /hr	182.50
10/28/2024	SB	Review and respond to email from Brian Landau and Jody Goodman regarding Wio bank	0.20	365.00 /hr	73.00
10/28/2024	SD	Review letter from Joshua Bratspies, Esq. re: UBS; review attachments; follow-up discussion with CPA and counsel re: recovery efforts, money tracing	0.50	450.00 /hr	225.00
10/29/2024	SD	Review documentation provided by consumers; confer with the receiver team	0.40	450.00 /hr	180.00
10/30/2024	SB	Review correspondence from consumer regarding invitation to new Slack platform. Email to counsel regarding same.	0.20	365.00 /hr	73.00
10/30/2024	SB	Review response from Wix team. Forward to Josh del Castillo Email exchange regarding their position not to comply with the turnover demand.	0.30	365.00 /hr	109.50
10/30/2024	SB	Forward response documentation from Payward Ventures to counsel	0.10	365.00 /hr	36.50
10/30/2024	SD	Review and analyze documentation Re: Masreq Bank; confer with Receiver team/CPA re: money tracing and cost-benefit analysis; review "big picture" targets for further investigation	0.40	450.00 /hr	180.00
10/30/2024	SD	Confer with counsel Re: Texas warehouse legal issues/property management contact; obtain legal advice	0.30	450.00 /hr	135.00
10/30/2024	SB	Return call to Mashreq Bank. Draft and send turnover demand letter to their legal department.	0.40	365.00 /hr	146.00
10/30/2024	SB	Review and respond to Mercury bank	0.10	365.00 /hr	36.50
10/31/2024	SB	Email exchange with team regarding bill.com.	0.20	365.00 /hr	73.00
10/31/2024	SB	Email exchange with Brian Landau and Jody Goodman regarding Currency cloud.	0.20	365.00 /hr	73.00
10/31/2024	LQ	Prepare interim report.	0.30	235.00 /hr	70.50
10/31/2024	LQ	Review bank transactions	0.20	235.00 /hr	47.00
10/31/2024	SD	Review/approve interim report.	0.20	450.00 /hr	90.00
10/31/2024	SD	Address "Bill.com" issues	0.10	450.00 /hr	45.00
10/31/2024	SB	Review Mercury transactions, email to Brian Landau regarding Taxcite account.	0.20	365.00 /hr	73.00
For professional services rendered			88.70		\$34,936.50



	<u>Amount</u>
Total amount of this bill	<b>\$34,936.50</b>

# **EXHIBIT 2**

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Joshua  
Date of Last Billing:  
Proforma Number: 1302250  
Client/Matter Joint Group # 395682.1

Matter #: 395682.00002

Client Name: Donell, Stephen J. (Receiver)  
Matter Name: General Receivership  
Client Matter Number:

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/13/24	9780088	Review complaint, minute order, and order appointing receiver (1.1); emails and teleconferences with Receiver (0.6); attend to initial case administration matters (1.0).	Del Castillo, Joshua	2.70	2,174.85	2,174.85	WO	HD	TR
09/14/24	9780089	Review documents (0.3); review and respond to Receiver emails (0.3).	Del Castillo, Joshua	0.60	483.30	2,658.15	WO	HD	TR
09/16/24	9780092	Review correspondence from Receiver and confer with AM counsel regarding critical initial receivership administration matters (1.4).	Del Castillo, Joshua	1.40	1,127.70	3,785.85	WO	HD	TR
09/16/24	9780101	Meeting with J. del Castillo and M. Kabeh regarding Ascend case.	Stefani, Madeline	0.50	157.50	3,943.35	WO	HD	TR
09/16/24	9780103	Emails with J. del Castillo and M. Kabeh regarding Ascend account IDs.	Stefani, Madeline	0.30	94.50	4,037.85	WO	HD	TR
09/16/24	9787715	Confer with Josh del Castillo regarding initial issues and tasks	Pham, Matt D.	0.20	123.30	4,161.15	WO	HD	TR
09/16/24	9789875	Multiple conferences with J. del Castillo regarding case status, action items, and strategy (.8); zoom conference with M.	Kebeh, Alphamorlai "Mo"	2.10	1,152.90	5,314.05	WO	HD	TR

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Stefani and J. del Castillo regarding FTC document production and related strategy (.5); tel conf. with J. del Castillo regarding debrief of call with defendants' former attorney and case status (.2); service of TRO on parties in interest (.3); prepare documents in connection with declaration of service of TRO (.3).								
09/17/24	9780095	Emails with Receiver's accounting team and local counsel (0.9); teleconferences with Receiver and FTC (0.4); prepare for and videoconferene with Receiver's accounting team (0.4).	Del Castillo, Joshua	1.70	1,369.35	6,683.40	WO	HD	TR	
09/17/24	9781512	Review case documents and begin review of FTC Volumes.	Stefani, Madeline	1.00	315.00	6,998.40	WO	HD	TR	
09/17/24	9789913	Videoconference with J. del Castillo and receiver professionals regarding status of investigative efforts and strategy (.5); correspondence regarding receivership activities in known defendant operations (1).	Kebeh, Alphamorlai "Mo"	1.50	823.50	7,821.90	WO	HD	TR	
09/18/24	9780096	Review Ascend case documents.	Stefani, Madeline	1.60	504.00	8,325.90	WO	HD	TR	
09/18/24	9780097	Review and respond to correspondence from Receiver and AM counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	483.30	8,809.20	WO	HD	TR	
09/18/24	9786990	Several conferences with counsel related to real property, notice, issues related to the personality and ownership issues.	Zaro, David	0.60	661.50	9,470.70	WO	HD	TR	

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action		
09/18/24	9787716	Confer with Josh del Castillo and Mo Kebeh regarding case update and outstanding tasks (0.3); Review and analyze FTC complaint and TRO application and begin preparing internal spreadsheet tracking relevant information (1.3)	Pham, Matt D.	1.60	986.40	10,457.10	WO	HD	TR
09/18/24	9790003	Zoom conf. with J. del Castillo and M. Pham regarding upcoming action items and strategy (.3).	Kebeh, Alphamorlai "Mo"	0.30	164.70	10,621.80	WO	HD	TR
09/19/24	9780093	Review FTC Exhibit Volumes for potential Ascend account IDs. Send findings to J. del Castillo and M. Kabeh for review.	Stefani, Madeline	3.50	1,102.50	11,724.30	WO	HD	TR
09/19/24	9780099	Emails with Allen Matkins counsel and Receiver regarding case and estate administration matters (0.6); teleconference with M. Kebeh regarding same (0.2); prepare email update to FTC (0.1); prepare for and videoconference with Receiver and FTC (1.6); follow-up emails (0.4); emails and teleconferences regarding 754 filings (0.3).	Del Castillo, Joshua	3.10	2,497.05	14,221.35	WO	HD	TR
09/19/24	9781202	Review and respond to emails with Mr. del Castillo regarding potential section 754 filings	Kaup, John	0.10	39.15	14,260.50	WO	HD	TR
09/24/24	9781037	Communications with M. Kebeh; review and analyze sealed Order regarding temporary restraining order and appointment of receiver, complaint, and communications regarding the same; research regarding jurisdictions relevant to filing of Notices of Appointment of Receiver; prepare summary	Pendleton, Michelle	2.10	822.15	15,082.65	WO	HD	TR

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		outlining the same; research online regarding court and local rules and issues relating to filing Notices of Appointment with sealed Order.							
09/24/24	9790406	Videoconference with J. del Castillo and Receiver's team regarding pending action items, upcoming call with defendants' counsel (.5); videoconference with defendants counsel, receiver, and j. del castillo regarding preliminary matters and upcoming hearing (.5); conference with J. del castillo regarding debrief of call with defendant's counsel (.4); preparing 754 notices for filing (.3).	Kebeh, Alphamorlai "Mo"	1.70	933.30	16,015.95	WO	HD	TR
09/25/24	9781191	Review correspondence from Court and Receiver's office and confer with M. Kebeh regarding critical case administration matters (0.7); videoconference with FTC and Receiver regarding case administration matters (0.7).	Del Castillo, Joshua	1.40	1,127.70	17,143.65	WO	HD	TR
09/25/24	9790457	Zoom conference with FTC, Receiver's team, and J. del Castillo regarding case updates and strategy and subsequent call with receiver's team regarding same (1.1);	Kebeh, Alphamorlai "Mo"	1.10	603.90	17,747.55	WO	HD	TR
09/26/24	9782908	Attention to case administration issues and review and respond to correspondence from counsel, FTC, and Receiver's office regarding same (1.2).	Del Castillo, Joshua	1.20	966.60	18,714.15	WO	HD	TR
09/30/24	9787226	Attention to case administration issues and emails with Receiver's office and AM counsel regarding same (1.1).	Del Castillo, Joshua	1.10	886.05	19,600.20	WO	HD	TR

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/01/24	9791188	Review letter to defendants' counsel regarding ongoing invoicing issue (.1); review entered order regarding notices of receivership (E.D. and S.D. Tex.) (.2); Review correspondence from J. del Castillo regarding 232 grand blvd TRO interpretation issues (.1); preparing and populating master case tracker sheet (.6).	Kebeh, Alphamorlai "Mo"	1.00	549.00	20,149.20	WO	HD	TR	
10/01/24	9791407	Videoconference with FTC regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	483.30	20,632.50	WO	HD	TR	
10/03/24	9793899	Attention to case administration issues (0.3).	Del Castillo, Joshua	0.30	241.65	20,874.15	WO	HD	TR	
10/04/24	9797093	review record of turnover/preservation letters, update master tracker regarding same (1.0).	Kebeh, Alphamorlai "Mo"	1.00	549.00	21,423.15	WO	HD	TR	
10/07/24	9796695	Attention to case administration issues and emails and teleconferences with AM counsel and Receiver's office (1.8); emails to FTC (0.2).	Del Castillo, Joshua	2.00	1,611.00	23,034.15	WO	HD	TR	
10/07/24	9797939	Review correspondence from Receiver and defendants' counsel regarding unauthorized "Ascend" communications and prepare cease and desist demand (0.3); prepare FAQs for Receiver's office (0.2); emails with Receiver and B. Landau regarding case administration matters (0.3); videoconference with FTC (0.4).	Del Castillo, Joshua	1.20	966.60	24,000.75	WO	HD	TR	
10/07/24	9831556	Correspondence with Receiver's team regarding order extending TRO (.1); update	Kebeh, Alphamorlai "Mo"	1.50	823.50	24,824.25	WO	HD	TR	



11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		master spreadsheet per received materials and related receivership information (.3); memo to J. del castillo regarding outstanding receivership tasks and update regarding status of receivership efforts (1.1).							
10/08/24	9831571	Correspondence with FTC regarding Defendants' produced documents to date (.1); correspondence with E.D. Cal. clerk regarding status of 754 notice filing (.1).	Kebeh, Alphamorlai "Mo"	0.20	109.80	24,934.05	WO	HD	TR
10/10/24	9801018	Email and teleconference with Receiver and B. Landau regarding status of case and case administration matters (0.5).	Del Castillo, Joshua	0.50	402.75	25,336.80	WO	HD	TR
10/11/24	9802385	Teleconferences and emails with Receiver's office, FTC, and counsel regarding case administration matters (0.6).	Del Castillo, Joshua	0.60	483.30	25,820.10	WO	HD	TR
10/14/24	9806002	Review and respond to emails from Receiver's office and FTC and attend to case administration issues (0.9); revise notices of designation of receivership and transmit for filing (0.3).	Del Castillo, Joshua	1.20	966.60	26,786.70	WO	HD	TR
10/14/24	9813422	Update and revise master tracker sheet per recently acquired information (1.1); conference with J. del Castillo regarding ongoing administrative matters (.2).	Kebeh, Alphamorlai "Mo"	1.30	713.70	27,500.40	WO	HD	TR
10/15/24	9806958	Review and respond to FTC correspondence regarding ACV solicitation of consumers and prepare and transmit cease and desist correspondence (0.3).	Del Castillo, Joshua	0.30	241.65	27,742.05	WO	HD	TR

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/15/24	9807048	Emails to Receiver's office and B. Landau regarding case administration matters (0.3).	Del Castillo, Joshua	0.30	241.65	27,983.70	WO	HD	TR
10/16/24	9807973	Review incoming correspondence regarding filing of 754 notices (.3); review notices of designation of receivership entity (Paradyne and Eaglemont), correspondence with client regarding same (.2); Conference with J. del Castillo regarding general receivership tasks, upcoming items, and strategy (.4); attend to issues regarding filing 754 notices (.1); review docket for update regarding status of TRO hearing (.1);	Kebeh, Alphamorlai "Mo"	1.10	603.90	28,587.60	WO	HD	TR
10/17/24	9809259	Prepare for and attend videoconference with FTC and Receiver regarding case administration status (0.6); follow-up emails regarding same (0.3).	Del Castillo, Joshua	0.90	724.95	29,312.55	WO	HD	TR
10/17/24	9831688	Review of FTC deposition of defendant leung (.1); review filed copy of 754 notice (S.D. Fla.) (.1); conference with J. del Castillo regarding outstanding action items and status of case (.2).	Kebeh, Alphamorlai "Mo"	0.40	219.60	29,532.15	WO	HD	TR
10/18/24	9810755	Analysis of inquiry regarding designation of additional receivership entities (0.9); review and revise notices to Eaglemont and Paradyne agents (0.3); review and confer regarding notices received in connection with certain 754 registrations (0.5); emails with Receiver, FTC, and third parties and attention to case administration matters (1.1); review opposition to PI and supporting documents and prepare notes	Del Castillo, Joshua	3.70	2,980.35	32,512.50	WO	HD	TR

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered for discussion with Receiver regarding same (0.9).	Timekeeper	Hours	Fees	Sum	Circle	Action		
10/18/24	9822898	Investigate potential issue regarding 754 notice filing (SD FLA) (.2); finalizing notice of designation of receivership entity letters (.6); Attention to outstanding receivership administration issues (.5).	Kebeh, Alphamorlai "Mo"	1.30	713.70	33,226.20	WO	HD	TR	_____
10/21/24	9812835	Videoconference with Receiver and FTC (0.2); review stipulation for PI and emails regarding same (0.3); emails and teleconferences with Receiver's office regarding case administration matters (0.5); prepare notice of designation regarding AC Ventures Global and correspondence regarding same (0.2).	Del Castillo, Joshua	1.20	966.60	34,192.80	WO	HD	TR	_____
10/22/24	9814842	Finalize letter template regarding receivership demand letter (.1); correspondence with J. del Castillo regarding additional potential receivership entity (.1); correspondence with receiver's team regarding list of related/affiliated entities (.2); review and revise 754 notice (SDNY), correspondence with B. Hail regarding filing same (.4); review notice of designation of receivership entity (AC ventures global), prepare correspondence to receivership entity regarding same (.5).	Kebeh, Alphamorlai "Mo"	1.30	713.70	34,906.50	WO	HD	TR	_____
10/22/24	9815490	Emails with M. Kebeh and Receiver's office regarding pending case administration matters (0.6); teleconference regarding same (0.3); review correspondence from clerk and recent docketing minutes (0.1).	Del Castillo, Joshua	1.00	805.50	35,712.00	WO	HD	TR	_____

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/23/24	9816805	Emails regarding case administration matters (0.3); review and respond to emails from FTC and Receiver's office regarding solicitation of entity consumers and prepare associated cease and desist demand (0.6); prepare FAQ for Receiver website (0.2); review and respond to correspondence from local counsel (0.2).	Del Castillo, Joshua	1.30	1,047.15	36,759.15	WO	HD	TR	_____
10/24/24	9817283	Correspondence regarding status of SDNY 754 filing (.1); review entered order extending TRO to Nov. 6, correspondence with receiver's professionals regarding same (.2); correspondence with entity of interest regarding extension of TRO (.2); review analysis from J. del Castillo regarding walzon facility issues (.1);	Kebeh, Alphamorlai "Mo"	0.60	329.40	37,088.55	WO	HD	TR	_____
10/24/24	9817429	Emails and confer with Receiver's office, FTC, Receiver's local counsel, and AM counsel regarding case administration matters (1.6); review order on stipulation (0.1).	Del Castillo, Joshua	1.70	1,369.35	38,457.90	WO	HD	TR	_____
10/25/24	9822893	Follow up with JLL counsel regarding inventory of Texas facility (.1); correspondence with receiver regarding consumer reports of fraud, review correspondence from J. del castillo regarding same (.2); memo to receiver's team regarding subpoena updates and issues relating to Kraken/Payward (.2); contemplate outstanding administration issues, attention to same (.6).	Kebeh, Alphamorlai "Mo"	1.10	603.90	39,061.80	WO	HD	TR	_____

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>	
10/27/24	9831757	Correspondence to defendants' counsel regarding issues with receivership password credentials and demand for update (.5).	Kebeh, Alphamorlai "Mo"	0.50	274.50	39,336.30	WO	HD	TR
10/28/24	9821903	Teleconference with M. Kebeh regarding case administration matters (0.5); review and respond to correspondence from Receiver's office regarding same (0.3); teleconference with Receiver (0.1).	Del Castillo, Joshua	0.90	724.95	40,061.25	WO	HD	TR
10/28/24	9831763	Conference with J. del Castillo regarding case status and open action items (.5); correspondence with J. del Castillo regarding response to FTC inquiries regarding received document productions (.3).	Kebeh, Alphamorlai "Mo"	0.80	439.20	40,500.45	WO	HD	TR
10/29/24	9823548	Review finalized letter notice of designation to AC Ventures Global (.1); analyze record of recent transaction attempts by defendants via Cloudpeak (.1); review new correspondence regarding Ascend solicitation attempts (.1); review update from server regarding attempt to serve subpoena, contemplate issues/potential resolutions regarding same (.2); correspondence with J. del Castillo regarding FTC request for CFSB production (.1); attention to Receiver's efforts to shut down active receivership entity websites (.4).	Kebeh, Alphamorlai "Mo"	1.00	549.00	41,049.45	WO	HD	TR
10/29/24	9823875	Videoconference with FTC regarding case administration matters and follow-up emails to Receiver's office and B. Landau	Del Castillo, Joshua	0.90	724.95	41,774.40	WO	HD	TR

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Fees for Matter 395682.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered regarding same (0.9).	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/30/24	9824949	Emails and teleconferences with Receiver's office and M. Kebeh regarding case administration matters (0.7); review and respond to emails from FTC and consumer (0.2).	Del Castillo, Joshua	0.90	724.95	42,499.35	WO	HD	TR _____
10/30/24	9831791	Conference with J. del Castillo regarding general receivership matters and open items (.3).	Kebeh, Alhamorlai "Mo"	0.30	164.70	42,664.05	WO	HD	TR _____
10/31/24	9825964	Correspondence with JLL counsel regarding volume of inventory in Grand Prairie warehouse (.1); review correspondence from receiver and J. del Castillo regarding TX facility rent claim (.1); conference with M. stefani regarding notices of abandonment and rejection relating to TX facilities (.3).	Kebeh, Alhamorlai "Mo"	0.50	274.50	42,938.55	WO	HD	TR _____
10/31/24	9828378	Analysis and determination of document productions.	Peng, Simona	0.30	117.45	43,056.00	WO	HD	TR _____

**Disbursements for Matter 395682.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
09/23/24	2905963	DCSRCH – Document Research - Nationwide Legal LLC - UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	0.00	267.80	WO	HD	TR _____
09/25/24	2905964	MSNGR – Messenger - Nationwide Legal LLC - ALLEN MATKINS - LA We need 8 certified copies of the attached order. Once you receive the certified copies, please have them deliver to our LA office to Martha Diaz's attention or Mo	0.00	43.75	WO	HD	TR _____

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Disbursements for Matter 395682.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt					
		Kebeh.							
09/26/24	2899549	FILING – Clerk of the Court - USDC, Texas Northern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/26/24	2899550	FILING – Clerk of the Court - USDC, Texas Western District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/26/24	2899551	FILING – Clerk of the Court - USDC, Texas Eastern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/26/24	2899552	FILING – Clerk of the Court - USDC, Texas Southern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/26/24	2899553	FILING – Clerk of the Court - USDC, Wyoming District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900353	FILING – Clerk of the Court - USDC, Florida Northern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900354	FILING – Clerk of the Court - USDC, Florida Middle District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900355	FILING – Clerk of the Court - USDC, Virginia Western District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900356	FILING – Clerk of the Court - USDC, Virginia Eastern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900357	FILING – Clerk of the Court - USDC, Michigan Western District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900358	FILING – Clerk of the Court - USDC, Michigan Eastern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900359	FILING – Clerk of the Court - USDC, New York Eastern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900360	FILING – Clerk of the Court - USDC, New York Northern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900361	FILING – Clerk of the Court - USDC, New York Southern District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2900362	FILING – Clerk of the Court - USDC, New York Western District - Filing Fee for Notice of Appointment of Receiver	0.00	52.00	WO	HD	TR		
09/28/24	2904300	FILING – Filing Fees - Martha Diaz - COURTS/USDC-CAS - Filing fee for New Case Miscellaneous filing with the CASD	0.00	52.00	WO	HD	TR		
09/30/24	2900352	FILING – Clerk of the Court - USDC, Florida Southern District -	0.00	52.00	WO	HD	TR		



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**Disbursements for Matter 395682.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
09/30/24	2902613	Filing Fee for Notice of Appointment of Receiver BW – Duplication - Black & White Copies	1,264.00	240.16	WO	HD	TR	_____
09/30/24	2903465	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	39.54	WO	HD	TR	_____
09/30/24	2903466	MSNGR – Federal Express - Ship To: Clerk of The Court - United States District Court	0.00	39.54	WO	HD	TR	_____
09/30/24	2903467	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	39.54	WO	HD	TR	_____
09/30/24	2903468	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	39.54	WO	HD	TR	_____
09/30/24	2905965	RECORD – Recording Fees - Nationwide Legal LLC - LA County Recorder	0.00	187.13	WO	HD	TR	_____
10/01/24	2903478	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	24.92	WO	HD	TR	_____
10/01/24	2903479	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	29.55	WO	HD	TR	_____
10/01/24	2905078	RECORD – Nationwide Legal, LLC - LA County Recorder, Notice of Pendency of Receivership Proceeding	0.00	1,112.63	WO	HD	TR	_____
10/02/24	2902819	BW – Duplication - Black & White Copies	158.00	30.02	WO	HD	TR	_____
10/02/24	2902820	COLOR – Duplication - Color Copies	1,166.00	291.50	WO	HD	TR	_____
10/02/24	2904056	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	24.92	WO	HD	TR	_____
10/03/24	2902866	BW – Duplication - Black & White Copies	103.00	19.57	WO	HD	TR	_____
10/03/24	2902867	COLOR – Duplication - Color Copies	1,236.00	309.00	WO	HD	TR	_____
10/03/24	2904060	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	36.82	WO	HD	TR	_____
10/03/24	2904061	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	46.67	WO	HD	TR	_____
10/03/24	2904062	MSNGR – Federal Express - Ship To: Clerk of the Court -	0.00	46.67	WO	HD	TR	_____

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**Disbursements for Matter 395682.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt					
10/03/24	2904063	United States District Court MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	46.67	WO	HD	TR	_____	
10/03/24	2904064	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	46.67	WO	HD	TR	_____	
10/03/24	2904068	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	24.92	WO	HD	TR	_____	
10/04/24	2904069	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	36.82	WO	HD	TR	_____	
10/04/24	2904070	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District	0.00	46.67	WO	HD	TR	_____	
10/04/24	2904071	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	41.39	WO	HD	TR	_____	
10/04/24	2904072	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	46.67	WO	HD	TR	_____	
10/04/24	2904073	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	46.67	WO	HD	TR	_____	
10/04/24	2904074	MSNGR – Federal Express - Ship To: Clerk of the Court - United States District Court	0.00	46.67	WO	HD	TR	_____	
10/07/24	2904085	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	43.74	WO	HD	TR	_____	
10/08/24	2904090	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	43.74	WO	HD	TR	_____	
10/08/24	2904091	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	28.40	WO	HD	TR	_____	
10/08/24	2904092	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	28.40	WO	HD	TR	_____	
10/09/24	2903361	BW – Duplication - Black & White Copies	2.00	0.38	WO	HD	TR	_____	
10/09/24	2903362	COLOR – Duplication - Color Copies	130.00	32.50	WO	HD	TR	_____	
10/09/24	2905343	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	43.74	WO	HD	TR	_____	
10/10/24	2905347	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen	0.00	43.74	WO	HD	TR	_____	

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

**Disbursements for Matter 395682.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt					
10/10/24	2905348	Matkins MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	33.03	WO	HD	TR	_____	
10/11/24	2905079	POS – Nationwide Legal, LLC - Truist Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	176.60	WO	HD	TR	_____	
10/11/24	2905080	POS – Nationwide Legal, LLC - First Foundation Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	201.00	WO	HD	TR	_____	
10/11/24	2905081	POS – Nationwide Legal, LLC - Bank of America, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	163.40	WO	HD	TR	_____	
10/11/24	2905082	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	164.00	WO	HD	TR	_____	
10/11/24	2905083	POS – Nationwide Legal, LLC - American Express National Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	286.00	WO	HD	TR	_____	
10/11/24	2905084	POS – Nationwide Legal, LLC - Payward, Inc. d/b/a Kraken, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	162.80	WO	HD	TR	_____	
10/11/24	2905085	POS – Nationwide Legal, LLC - Evolve Bank & Trust, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	176.00	WO	HD	TR	_____	
10/11/24	2905086	POS – Nationwide Legal, LLC - Forward Wilshire, Inc., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	354.60	WO	HD	TR	_____	
10/11/24	2905087	POS – Nationwide Legal, LLC - Barclays Bank Delaware, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION,	0.00	286.00	WO	HD	TR	_____	

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**Disbursements for Matter 395682.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
		OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION						
10/11/24	2905088	POS – Nationwide Legal, LLC - Charles Schwab & Co., Inc., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	162.80	WO	HD	TR	_____
10/11/24	2905089	POS – Nationwide Legal, LLC - Community Federal Savings Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	276.10	WO	HD	TR	_____
10/11/24	2905090	POS – Nationwide Legal, LLC - American Express Travel Related Services Company, Inc., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	286.00	WO	HD	TR	_____
10/11/24	2905091	POS – Nationwide Legal, LLC - West Coast Escrow Company, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	174.20	WO	HD	TR	_____
10/11/24	2905353	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	43.74	WO	HD	TR	_____
10/15/24	2905381	MSNGR – Federal Express - Ship To: Mo Kebeh - Allen Matkins	0.00	47.82	WO	HD	TR	_____
10/21/24	2904748	BW – Duplication - Black & White Copies	138.00	26.22	WO	HD	TR	_____
10/21/24	2904749	COLOR – Duplication - Color Copies	140.00	35.00	WO	HD	TR	_____
10/28/24	2905550	BW – Duplication - Black & White Copies	4.00	0.76	WO	HD	TR	_____
10/29/24	2905608	COLOR – Duplication - Color Copies	4.00	1.00	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	1,102.50	661.50
000820	Kaup, John	0.10	391.50	39.15

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

### Proforma Summary

#### Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	33.30	805.50	26,823.15
002307	Peng, Simona	0.30	391.50	117.45
002510	Pham, Matt D.	1.80	616.50	1,109.70
002557	Stefani, Madeline	6.90	315.00	2,173.50
002603	Pendleton, Michelle	2.10	391.50	822.15
002661	Kebeh, Alphamorlai "Mo"	20.60	549.00	11,309.40
		65.70		\$43,056.00
Subtotal Fees				\$43,056.00
Discount				0.00
Total Fees				43,056.00
Total Disbursements				7,458.13

#### Attorney Billing Instructions

( )	BILL ALL	( )	Hold
( )	BILL FEES ONLY	( )	Write Off
( )	BILL COST ONLY	( )	Transfer All

#### Billing Instructions

expires 6/30/2025:: 10% off standard rates (automatic)

#### Account Summary – As Of 11/01/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	65,843.30	45,490.50	20,352.80	52,948.63	45,490.50	7,458.13	52,948.63	45,490.50	7,458.13
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>52,953.24</b>	<b>45,490.50</b>	<b>7,462.74</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								

11/04/24 13:37:07 PROFORMA STATEMENT FOR MATTER 395682.00002 (Donell, Stephen J. (Receiver)) (General Receivership)

<b><i>Payment</i></b>	
<b><i>Client Trust</i></b>	<b><i>0.00</i></b>
<b><i>Balance</i></b>	

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**Billing Address**

Donell, Stephen J. (Receiver)  
12121 Wilshire Boulevard, Suite 1120  
Los Angeles, CA 90025

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11/04/24 13:37:09 PROFORMA STATEMENT FOR MATTER 395682.00003 (Donell, Stephen J. (Receiver)) (Asset Recovery & Management)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 395682.00003 Client Name: Donell, Stephen J. (Receiver)  
Joshua  
Date of Last Billing: Matter Name: Asset Recovery & Management  
Proforma Number: 1302250  
Client/Matter Joint Group # 395682.1 Client Matter Number:

**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/16/24	9780091	Teleconferences with warehouse operator and local TX counsel regarding warehouse takeover and related issues (0.9); teleconferences and emails with Receiver, local TX counsel, warehouse administration, and FTC attorneys regarding takeover issues (1.2); attention to related takeover matters (0.9).	Del Castillo, Joshua	3.00	2,416.50	2,416.50	WO	HD	TR
09/17/24	9780094	Prepare draft letter to Walzon regarding receivership inventory and transmit for Receiver review and approval (0.3).	Del Castillo, Joshua	0.30	241.65	2,658.15	WO	HD	TR
09/18/24	9780098	Revise and transmit Walzon letter (0.2); review and respond to correspondence from Receiver's office regarding asset freeze issues (0.9); confer with counsel regarding same (0.6); prepare and transmit notice letters (0.5); emails and teleconference with realtor selling suspected receivership property (0.2).	Del Castillo, Joshua	2.40	1,933.20	4,591.35	WO	HD	TR
09/18/24	9790037	Analyze correspondence containing information regarding potential assets and	Kebeh, Alphamorlai "Mo"	2.00	1,098.00	5,689.35	WO	HD	TR



11/04/24 13:37:09 PROFORMA STATEMENT FOR MATTER 395682.00003 (Donell, Stephen J. (Receiver)) (Asset Recovery & Management)

**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		receivership entities (.6); review J. del castillo letter to parties in interest regarding notice of receivership and tro (.3); prepare preservation letter to financial institutions, analyze tro in connection with same (1.1).							
09/23/24	9780107	Prepare for and videoconference with FTC and Receiver regarding case administration matters (0.8); confer with M. Kebeh and M. Pham regarding 754 filings and notices of pending receivership (0.5); review documents (0.4); attention to case administration matters (0.5); emails with defendants' counsel (0.1).	Del Castillo, Joshua	2.10	1,691.55	7,380.90	WO	HD	TR
09/23/24	9790363	Review correspondence from FTC regarding asset freeze correspondence to financial institutions (.1); correspondence with J. del Castillo regarding upcoming action items (.2); conference with M. Pham regarding preparing notices of pending receivership (.2); analyze tro regarding defendant turnover requirements, prepare memo to J. del castillo regarding same (1); preparing 754 notices of receivership for filing in relevant jurisdictions (1).	Kebeh, Alphamorlai "Mo"	2.50	1,372.50	8,753.40	WO	HD	TR
09/24/24	9780191	Confer with M. Kebeh regarding notices of pending receivership and email to courtroom deputy regarding same (0.4).	Del Castillo, Joshua	0.40	322.20	9,075.60	WO	HD	TR
09/24/24	9781204	Telephone call with Mr. Kebeh and Ms. Pendelton regarding Section 754 notices of appointment of receiver; initial review of draft notice; review and respond to emails; analysis of case materials and issue of	Kaup, John	0.50	195.75	9,271.35	WO	HD	TR

11/04/24 13:37:09 PROFORMA STATEMENT FOR MATTER 395682.00003 (Donell, Stephen J. (Receiver)) (Asset Recovery & Management)

**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		sealed order							
09/24/24	9790869	Revise notices of pendency of receivership (.5).	Kebeh, Alphamorlai "Mo"	0.50	274.50	9,545.85	WO	HD	TR _____
09/25/24	9781319	Emails with M. Kebeh and B. Landau regarding suspected receivership real properties and associated filings/recordations (0.3); review documents regarding same (0.5).	Del Castillo, Joshua	0.80	644.40	10,190.25	WO	HD	TR _____
09/25/24	9782150	Review and respond to emails; review and comment on draft section 754 notices of receivership and accompanying letters; review and analysis of temporary restraining order and appointment of receiver.	Kaup, John	1.00	391.50	10,581.75	WO	HD	TR _____
09/25/24	9790863	Prepare notices of pendency of receiverships (.3).	Kebeh, Alphamorlai "Mo"	0.30	164.70	10,746.45	WO	HD	TR _____
09/25/24	9798775	Contemplate outstanding action items, status of 754 notices and notices of pendency of receivership (.5); prepare 754 notices (.3).	Kebeh, Alphamorlai "Mo"	0.80	439.20	11,185.65	WO	HD	TR _____
09/26/24	9782131	Review lease transmitted by broker and FTC regarding Grand property (0.2).	Del Castillo, Joshua	0.20	161.10	11,346.75	WO	HD	TR _____
09/26/24	9782326	Draft correspondence to District Courts in Florida, Virginia, and Michigan regarding Notice of Appointment of Receiver; communications with M. Diaz.	Pendleton, Michelle	0.30	117.45	11,464.20	WO	HD	TR _____
09/26/24	9783260	Review and respond to emails regarding section 754 notices.	Kaup, John	0.30	117.45	11,581.65	WO	HD	TR _____

11/04/24 13:37:09 PROFORMA STATEMENT FOR MATTER 395682.00003 (Donell, Stephen J. (Receiver)) (Asset Recovery &amp; Management)

**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/26/24	9790862	Investigate potential receivership real property asset documents for legal description (.2).	Kebeh, Alphonmorlai "Mo"	0.20	109.80	11,691.45	WO	HD	TR _____
09/27/24	9784008	Teleconference with Douglas Elliman representative and email to Receiver and FTC regarding same (0.4); review materials circulated by M. Kebeh in connection with notices of pendency of receivership and teleconference regarding same (0.6).	Del Castillo, Joshua	1.00	805.50	12,496.95	WO	HD	TR _____
09/27/24	9790738	Update notices of pendency of receivership per additional information from new property reports (.8).	Kebeh, Alphonmorlai "Mo"	0.80	439.20	12,936.15	WO	HD	TR _____
09/27/24	9790747	Preparing and filing 754 notices (.7); continue developing master action item tracking sheet (.3).	Kebeh, Alphonmorlai "Mo"	1.00	549.00	13,485.15	WO	HD	TR _____
09/30/24	9786692	Prepare template turnover letter (0.3); prepare turnover letter and transmit to attorney Herpy (0.2); prepare notice of designation of receivership entity for GMD and emails regarding same (0.6).	Del Castillo, Joshua	1.10	886.05	14,371.20	WO	HD	TR _____
09/30/24	9790829	Review entered order regarding 754 notice (SD Cal) (.1); conference with j. del castillo regarding status update on pending action items (.2); tel. conference with receiver's CPA regarding organizing ftc data (.3).	Kebeh, Alphonmorlai "Mo"	0.60	329.40	14,700.60	WO	HD	TR _____
10/01/24	9791184	Review and respond to correspondence from Receiver's office (0.5); prepare notices regarding designation of GMD as receivership entity to GMD, First	Del Castillo, Joshua	2.90	2,335.95	17,036.55	WO	HD	TR _____

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**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		Foundation Bank, and revise Bank of America demand (1.0); review related materials from Receiver's office and confer with M. Kebeh regarding same (1.4).							
10/02/24	9792253	Emails and teleconferences with M. Kebeh and M. Diaz regarding asset recovery matters (1.4); review and respond to correspondence from FTC regarding property reports and title (0.2); emails with B. Landau (0.2); transmit notice to third party (0.1); review voicemail from Bank of America and emails with Receiver and M. Kebeh (0.2); review and revise draft turnover letters and correspondence regarding same (0.9).	Del Castillo, Joshua	3.00	2,416.50	19,453.05	WO	HD	TR
10/03/24	9793436	Review and revise additional turnover letters and confer with M. Kebeh regarding same (0.7); review and respond to correspondence from K. Crowley and write to her counsel at Crowell & Moring (0.2); legal analysis of turnover issue (0.2).	Del Castillo, Joshua	1.10	886.05	20,339.10	WO	HD	TR
10/03/24	9797090	Review 754 notices of pending receivership (VY and NY) (.2).	Kebeh, Alphamorlai "Mo"	0.20	109.80	20,448.90	WO	HD	TR
10/04/24	9794487	Prepare and transmit follow-up turnover demands (0.6); emails with counsel for Crowley/GMD (0.1); follow-up discussions regarding analysis of turnover issues (0.3).	Del Castillo, Joshua	1.00	805.50	21,254.40	WO	HD	TR
10/07/24	9797415	Teleconference with B. Landau regarding asset recovery issues (0.3); emails and confer with M. Kebeh regarding same (0.3); review email from FTC and prepare urgent	Del Castillo, Joshua	1.10	886.05	22,140.45	WO	HD	TR

11/04/24 13:37:09 PROFORMA STATEMENT FOR MATTER 395682.00003 (Donell, Stephen J. (Receiver)) (Asset Recovery & Management)

**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		demand letter to Grantie Escrow (0.5).							
10/08/24	9799201	Review Barclays demand letter and confer with M. Kebeh regarding same (0.2); confer with M. Kebeh regarding status of responses to prior turnover/freeze letters (0.5); review responses to same (0.4).	Del Castillo, Joshua	1.10	886.05	23,026.50	WO	HD	TR
10/10/24	9801467	Emails with M. Kebeh regarding follow-up demand to Granite Escrow (0.2); review and respond to correspondence from outside general counsel for Granite Escrow (0.2).	Del Castillo, Joshua	0.40	322.20	23,348.70	WO	HD	TR
10/11/24	9802239	Review correspondence from Walzon regarding warehouse, utilities, and inventory and confer with Receiver regarding same (0.3); prepare follow-up inquiry to Walzon (0.2); teleconference with counsel for Granite Escrow (0.3); prepare follow-up emails and confer regarding same (0.5).	Del Castillo, Joshua	1.30	1,047.15	24,395.85	WO	HD	TR
10/14/24	9804816	Emails with Receiver's office and confer with M. Stefani regarding designations of non-parties as receivership entities (0.4); emails and confer with Receiver's office and M. Kebeh regarding bank turnover issues (0.6).	Del Castillo, Joshua	1.00	805.50	25,201.35	WO	HD	TR
10/15/24	9806678	Confer with M. Kebeh and M. Stefani regarding revised notice of notice of designation of receivership entities and associated turnover demands (0.4); emails with Receiver's office regarding turnover matters (0.2); legal analysis of turnover	Del Castillo, Joshua	1.20	966.60	26,167.95	WO	HD	TR

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**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered issue (0.6).	Timekeeper	Hours	Fees	Sum	Circle Action			
10/17/24	9831684	Review update from receiver's team regarding asset liquidation efforts regarding financial institutions (.3).	Kebeh, Alphamorlai "Mo"	0.30	164.70	26,332.65	WO	HD	TR	_____
10/18/24	9810440	Emails with Receiver's office regarding funds turnovers (0.6).	Del Castillo, Joshua	0.60	483.30	26,815.95	WO	HD	TR	_____
10/21/24	9812836	Teleconference with counsel for UBS regarding turnover (0.2); review documents regarding same (0.2); prepare update to Receiver's office (0.1).	Del Castillo, Joshua	0.50	402.75	27,218.70	WO	HD	TR	_____
10/23/24	9816726	Review correspondence from B. Landau and S. Bates regarding Florida properties and attention to property report issues regarding same (0.8).	Del Castillo, Joshua	0.80	644.40	27,863.10	WO	HD	TR	_____
10/24/24	9817573	Review and respond to correspondence regarding warehouse lease (0.4); prepare follow-up to UBS counsel (0.1); review and respond to correspondence from Receiver's office regarding additional consumer payment solicitations and confer regarding same (0.4).	Del Castillo, Joshua	0.90	724.95	28,588.05	WO	HD	TR	_____
10/28/24	9820600	Review letter and exhibits from UBS counsel (0.4); emails and confer with M. Pham regarding same (0.3).	Del Castillo, Joshua	0.70	563.85	29,151.90	WO	HD	TR	_____
10/28/24	9831118	Confer with Josh del Castillo regarding UBS account issue (0.2); Review and analyze UBS collateral/control agreements for turnover issue (1.4)	Pham, Matt D.	1.60	986.40	30,138.30	WO	HD	TR	_____

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**Fees for Matter 395682.00003.(Asset Recovery & Management)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
10/29/24	9823967	Confer with M. Pham regarding analysis of UBS loan documents and prepare memo to Receiver regarding same (1.1); confer with Receiver (0.2); teleconference with UBS counsel regarding UBS loan and related turnover request (0.3); attention to issues regarding same (0.2).	Del Castillo, Joshua	1.80	1,449.90	31,588.20	WO	HD	TR	
10/29/24	9831153	Confer with Josh del Castillo regarding results of analysis of UBS collateral/control agreements	Pham, Matt D.	0.30	184.95	31,773.15	WO	HD	TR	
10/30/24	9825285	Prepare response letter to UBS counsel regarding turnover and transmit to Receiver for review and comment (0.3); follow-up correspondence with Receiver and UBS counsel (0.2).	Del Castillo, Joshua	0.50	402.75	32,175.90	WO	HD	TR	
10/31/24	9827001	Review and respond to emails from Receiver's office regarding estate management matters (0.4); prepare additional notes for discussion regarding same (0.2).	Del Castillo, Joshua	0.60	483.30	32,659.20	WO	HD	TR	
10/31/24	9831805	Correspondence with JLL's counsel and Receiver regarding value estimation of items at Texas facility (.2).	Kebeh, Alphamorlai "Mo"	0.20	109.80	32,769.00	WO	HD	TR	

**Proforma Summary**

<b>Timekeeper Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000820	Kaup, John	1.80	391.50	704.70
001842	Del Castillo, Joshua	31.80	805.50	25,614.90
002510	Pham, Matt D.	1.90	616.50	1,171.35
002603	Pendleton, Michelle	0.30	391.50	117.45

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**Proforma Summary****Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
002661	Kebeh, Alphonse "Mo"	9.40	549.00	5,160.60
		45.20		\$32,769.00
Subtotal Fees				\$32,769.00
Discount				0.00
Total Fees				32,769.00
Total Disbursements				0.00

**Attorney Billing Instructions**

( ) BILL ALL	( ) Hold
( ) BILL FEES ONLY	( ) Write Off
( ) BILL COST ONLY	( ) Transfer All

**Billing Instructions**

expires 6/30/2025:: 10% off standard rates (automatic)
--

**Account Summary – As Of 11/01/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	32,985.00	32,985.00	0.00	32,985.00	32,985.00	0.00	32,985.00	32,985.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>32,985.00</b>	<b>32,985.00</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									



11/04/24 13:37:09 PROFORMA STATEMENT FOR MATTER 395682.00003 (Donell, Stephen J. (Receiver)) (Asset Recovery & Management)

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**Billing Address**

Donell, Stephen J. (Receiver)  
12121 Wilshire Boulevard, Suite 1120  
Los Angeles, CA 90025

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11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo, Matter #: 395682.00004 Client Name: Donell, Stephen J. (Receiver)  
Joshua  
Date of Last Billing: Matter Name: Investigation & Reporting  
Proforma Number: 1302250  
Client/Matter Joint Group # 395682.1 Client Matter Number:

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/17/24	9798747	Preparing receiver's preliminary report (2); conference with J. del Castillo regarding preliminary report issues and strategy (.6).	Kebeh, Alphamorlai "Mo"	2.60	1,427.40	1,427.40	WO	HD	TR
09/19/24	9790071	Zoom conference with receiver, FTC, and receiver's accountant regarding status of investigation and strategy (1.5); tel. conference with receiver regarding strategy call with FTC, correspondence with J. del castillo regarding same (.2); prepare initial draft report (1.0).	Kebeh, Alphamorlai "Mo"	2.70	1,482.30	2,909.70	WO	HD	TR
09/20/24	9780104	Complete revisions to Receiver's Initial Report, confer with M. Kebeh regarding same, and transmit to Receiver for review and comment (2.7); review and respond to emails from Receiver's office and FTC regarding third party communications and discovery (0.4).	Del Castillo, Joshua	3.10	2,497.05	5,406.75	WO	HD	TR
09/23/24	9780109	Review Receiver comments to Initial Report, complete revisions, and transmit for filing (0.5); review and respond to correspondence from B. Landau regarding	Del Castillo, Joshua	0.60	483.30	5,890.05	WO	HD	TR

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**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		escrow summary (0.1).							
09/24/24	9780110	Review and respond to correspondence from Receiver's office and AM counsel regarding document review and analysis, and lack of entity business records (0.5); preliminary review of certain real property reports (0.5); confer with M. Kebeh regarding same (0.2); prepare for and attend calls with Receiver's office and defendants' counsel (1.1).	Del Castillo, Joshua	2.30	1,852.65	7,742.70	WO	HD	TR
09/24/24	9790419	Conference with J. del castillo regarding preliminary report and FTC/receivership investigation targets (.5); analyze suspected asset property profiles, cross reference with FTC data regarding potential receivership assets (.6); draft memorandum detailing conference with potential source regarding FTC investigation (.7); telephone conference with potential source regarding ongoing FTC investigation (.5);	Kebeh, Alphamorlai "Mo"	2.30	1,262.70	9,005.40	WO	HD	TR
09/25/24	9782128	Confer extensively with M. Kebeh, Receiver's office, and SL Biggs regarding document recovery and review plan (2.3).	Del Castillo, Joshua	2.30	1,852.65	10,858.05	WO	HD	TR
09/25/24	9790494	Analyze FTC produced documents for details regarding individual defendants (.3).	Kebeh, Alphamorlai "Mo"	0.30	164.70	11,022.75	WO	HD	TR
09/26/24	9782657	Review and respond to correspondence from defendants' counsel regarding forthcoming production and various internal emails regarding same (0.5); prepare notes and teleconference with M. Kebeh regarding critical document recovery tasks	Del Castillo, Joshua	1.10	886.05	11,908.80	WO	HD	TR

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**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered and related matters (0.6).	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/26/24	9790614	Preparing 754 notices (.1); create list and track entities issued asset freeze letters from ftc (.4); analyze ftc subpoena records (.5); analyze ftc-produced materials in connection with preparation of subpoena list (1); begin preparing active receivership item tracking list (.4); Tel. conference with J. del Castillo regarding creating tracker of active items/open tasks (.3).	Kebeh, Alphamorlai "Mo"	2.70	1,482.30	13,391.10	WO	HD	TR	_____
09/27/24	9784004	Emails and confer with M. Pham, M. Kebeh, and S. Peng regarding document production receipt issues (0.5); emails with M. Kebeh and Receiver's office regarding document recovery and subpoena matters (0.5); review correspondence from Receiver's office regarding bank production and preliminary review of same (0.4).	Del Castillo, Joshua	1.40	1,127.70	14,518.80	WO	HD	TR	_____
09/27/24	9787751	Email correspondence with Defendants' counsel regarding document productions (0.2)	Pham, Matt D.	0.20	123.30	14,642.10	WO	HD	TR	_____
09/27/24	9790729	Extensive analysis of additional real property reports regarding potential connection to receivership assets (1.2).	Kebeh, Alphamorlai "Mo"	1.20	658.80	15,300.90	WO	HD	TR	_____
09/30/24	9785579	Review correspondence data shared from receiver's team regarding potential investigation targets and case administration issues (.5); draft access letter to ftc regarding sharing documents (.2).	Kebeh, Alphamorlai "Mo"	0.70	384.30	15,685.20	WO	HD	TR	_____

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**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/30/24	9786526	Emails and teleconferences with M. Kebeh, M. Stefani, and B. Laudau regarding documents and account review and analysis, and preliminary conclusions from same (1.5); emails with Receiver regarding FTC depositions and review materials in connection with same (0.9).	Del Castillo, Joshua	2.40	1,933.20	17,618.40	WO	HD	TR
10/01/24	9790411	Review correspondence regarding new information obtained regarding Receivership Entity operations, billing, and other functions and confer with Receiver's office regarding same (0.9); prepare demand letter to defendants' counsel (0.3); review documents in anticipation of deposition (0.6); emails regarding deposition (0.2).	Del Castillo, Joshua	2.00	1,611.00	19,229.40	WO	HD	TR
10/02/24	9793218	Draft turnover letter to Intuit for recovery of QuickBook files and other documents relating to Ascend Receivership Entities. (1.1) Send to A. Kebeh for review. (0.1)	Stefani, Madeline	1.20	378.00	19,607.40	WO	HD	TR
10/02/24	9795348	Analysis and determination of document productions.	Peng, Simona	0.10	39.15	19,646.55	WO	HD	TR
10/02/24	9831471	Contemplate issues regarding intuit turnover letter (.3); finalize bofa turnover letter (.2); review drafts of 754 notices of receivership (.2); prepare letter to Ben Ralph regarding asset freeze and turnover (.6); investigate voicemail from bofa regarding asset freeze/turnover demand (.4); prepare asset freeze and turnover letter to JLL (.6); analyze J. del Castillo revisions to ben ralph letter, revise per same (.4);	Kebeh, Alphamorlai "Mo"	2.70	1,482.30	21,128.85	WO	HD	TR

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation &amp; Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
10/03/24	9793692	Review and revise document turnover demands and confer with M. Kebeh regarding same (0.6); review accountitng summary transmitted by B. Landau in connection with GMD (0.2); confer regarding production of documents from defendants' counsel (0.5); emails regarding forensic accounting inquiries (0.2).	Del Castillo, Joshua	1.50	1,208.25	22,337.10	WO	HD	TR	_____
10/03/24	9795347	Analysis and determination of document productions.	Peng, Simona	0.20	78.30	22,415.40	WO	HD	TR	_____
10/03/24	9797082	Tel. conference with BofA regarding identified receivership entity accounts (.3); revise intuit turnover letter and finalize same (.3); analyze production from BofA regarding receivership entity account information (.2); analyze defendants' 2nd and 3rd production of documents (.4).	Kebeh, Alphamorlai "Mo"	1.20	658.80	23,074.20	WO	HD	TR	_____
10/06/24	9795717	Review and respond to correspondence from FTC and Receiver and review documents in connection with same (0.4); emails to AM personnel (0.2); review correspondence regarding bank subpoenas and GMC accounts (0.2).	Del Castillo, Joshua	0.80	644.40	23,718.60	WO	HD	TR	_____
10/07/24	9796699	Prepare for and teleconference with counsel for K. Crowley (0.4); confer with M. Kebeh regarding same and outstanding subpoenas (0.3).	Del Castillo, Joshua	0.80	644.40	24,363.00	WO	HD	TR	_____
10/07/24	9831549	conference with M. stefani regarding preparing demand letters to financial institution (.5).	Kebeh, Alphamorlai "Mo"	0.50	274.50	24,637.50	WO	HD	TR	_____

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**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
10/08/24	9798998	Follow up correspondence with Granite escrow regarding status of asset freeze (.1); correspondence with Intuit's counsel regarding demand letter response (.1); conference with bank of america rep regarding production of documents and turnover of assets (.1); investigate defendants' personal identifiers (SSN/EINs) (.2); revise demand letter to barclays bank (.3); conference with m. stefani regarding revisions to demand letter (.4).	Kebeh, Alphamorlai "Mo"	1.20	658.80	25,296.30	WO	HD	TR	
10/08/24	9805568	Confer with Josh del Castillo regarding subpoenas to be issued (0.4); Review documents provided by client and produced by defendants for information on defendants for inclusion in subpoenas (1.8); Update internal spreadsheet tracking information regarding defendants and related parties (1.1); Prepare subpoena templates, including template for subpoenas to financial institutions (1.7)	Pham, Matt D.	5.00	3,082.50	28,378.80	WO	HD	TR	
10/09/24	9800045	Review notes and teleconference with M. Pham regarding necessary first-round subpoenas (0.5); emails with M. Kebeh regarding status of document demand letters (0.2); review and respond to correspondence from attorney Herpy regarding same (0.1).	Del Castillo, Joshua	0.80	644.40	29,023.20	WO	HD	TR	
10/09/24	9805571	Confer with Josh del Castillo regarding subpoena-related issues (0.2); Prepare subpoenas to eleven banks or financial institutions (2.3); Prepare subpoenas to two	Pham, Matt D.	3.30	2,034.45	31,057.65	WO	HD	TR	

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**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		escrow companies (0.8)							
10/09/24	9805881	Finalize and send demand letter to barclays bank (.2); investigate larchmont and west coast escrow escrow documents (.4); correspondence with granite escrow regarding status of asset freeze (.2); conference with M. Pham regarding anticipated subpoenas (.1); investigate production obtained from consumer (.4); analyze 1st round of prepared subpoenas (.3).	Kebeh, Alhamorlai "Mo"	1.60	878.40	31,936.05	WO	HD	TR
10/10/24	9801184	Emails with M. Kebeh and FTC regarding discovery matters (0.4).	Del Castillo, Joshua	0.40	322.20	32,258.25	WO	HD	TR
10/11/24	9802149	Confer with M. Pham and M. Kebeh regarding pending/outstanding subpoenas and related discovery matters (0.5); review and respond to correspondence regarding same (0.4); download FTC production and emails with Receiver's office regarding same (0.2).	Del Castillo, Joshua	1.10	886.05	33,144.30	WO	HD	TR
10/11/24	9803648	Analysis and determination of document productions.	Peng, Simona	0.20	78.30	33,222.60	WO	HD	TR
10/11/24	9805924	review correspondence relating to demand letter issued to crypto.com (.1); contemplate potential additional subpoena targets, analysis of produced data in connection with same (1.2); finalize and send first round of subpoenas (.6); prepare demand letter to Foris Dax, review initial correspondence with crypto.com in connection with same (.9).	Kebeh, Alhamorlai "Mo"	2.80	1,537.20	34,759.80	WO	HD	TR



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**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
10/11/24	9831617	Conference with M. Pham and J. del Castillo (partial) regarding finalizing initial batch of subpoenas (.4); conference with J. del Castillo regarding granite escrow issue (.1).	Kebeh, Alhamorlai "Mo"	0.50	274.50	35,034.30	WO	HD	TR _____
10/14/24	9804379	Review B. Landau analyses regarding funds transfers (Ascend eComm and Paradyme) and emails regarding same (0.6); confer with M. Pham and M. Kebeh regarding subpoenas and pending discovery/inquiries (0.5).	Del Castillo, Joshua	1.10	886.05	35,920.35	WO	HD	TR _____
10/14/24	9831646	Correspondence with counsel for Intuit regarding turnover of books and records (.2); review NFCU production (.1); draft memo regarding update regarding subpoena targets (.2).	Kebeh, Alhamorlai "Mo"	0.50	274.50	36,194.85	WO	HD	TR _____
10/15/24	9807053	Review notices of designation of receivership entities (.2); correspondence with J. del Castillo and receiver's team regarding same (.4); conference with M. Stefani regarding same (.1); review materials regarding defendants' relationship with Texas Walzon warehouse (.2); revise subpoena to larchmont escrow (.2).	Kebeh, Alhamorlai "Mo"	1.10	603.90	36,798.75	WO	HD	TR _____
10/16/24	9807872	Attending to issues regarding first round of subpoenas (.2); review Basta deposition transcripts (.1); correspondence with West Coast Escrow rep regarding subpoena production (.2); review correspondence from FTC regarding continuation of defendant business activity (.1);	Kebeh, Alhamorlai "Mo"	2.10	1,152.90	37,951.65	WO	HD	TR _____

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		correspondence with receiver's team regarding additional subpoena target (.2); memo to j. del castillo regarding amex response to subpoena, correspondence with M. Pham regarding same (.5); correspondence with receiver and team regarding identification of new potentially related entity, memo to J. del Castillo regarding same (.6); attend to document production request to Intuit (.2).							
10/16/24	9808369	Revie wnotes, confer with M. Kebeh, and prepare draft Supplement to Receiver's Initial Report (2.7); emails with Receiver's office regarding same (0.5); review and respond to correspondence from Receiver's office and B. Landau regarding document review and analysis issues (0.5); confer with M. Kebeh regarding outstanding discovery and review and respond to emails regarding same (0.4).	Del Castillo, Joshua	4.10	3,302.55	41,254.20	WO	HD	TR
10/17/24	9808904	correspondence with M. Pham regarding amex subpoena response (.1); review J. del Castillo redline regarding supplement to initial receiver's report (.1); attending to issues regarding intuit turnover request, correspondence with receiver's team regarding same (.1); correspondence with J. del Castillo regarding access to defendants' communication platforms (.1); videoconference with Intuit counsel regarding turnover of documents (.2); analyze supplement to initial receiver's report (.4); correspondence to Intuit's counsel regarding recap of call, action	Kebeh, Alphamorlai "Mo"	2.40	1,317.60	42,571.80	WO	HD	TR

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		items, and requested information (.6); review defendants' fourth document production (.3); prepare additional notice of designation letters to Paradyme Capital and Eaglemont, revise same (.5).							
10/17/24	9809027	Review Leung deposition transcript and prepare notes for discussion with Receiver and M. Kebeh (1.2); emails regarding same (0.5).	Del Castillo, Joshua	1.70	1,369.35	43,941.15	WO	HD	TR
10/18/24	9810351	Review status update from receiver's team regarding status of Wise production (.1); analyze statement regarding account balances from UBS (.2); conference with M. pham regarding service of notices of designation of receivership entity (.2); correspondence with M. Stefani regarding incoming FTC production (.1); correspondence with receiver's team regarding Intuit doc production process (.1); Investigate "sage" as potential subpoena target (.2); address responses to subpoenas (.2); review evolve bank production (.3); attend to UBS receivership asset summary issues (.4); correspondence with intuit's counsel regarding method of production of documents (.3).	Kebeh, Alphamorlai "Mo"	2.10	1,152.90	45,094.05	WO	HD	TR
10/21/24	9812316	Review correspondence regarding consumer communciations (0.4); emails and confer with M. Kebeh regarding information included in defendant doc productions relevant to same (0.6); teleconference with counsel for GMD regarding Receiver inquiry and follow-up	Del Castillo, Joshua	1.50	1,208.25	46,302.30	WO	HD	TR

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered with M. Kebeh regarding same (0.5).	Timekeeper	Hours	Fees	Sum	Circle Action			
10/21/24	9812345	Correspondence with J. del Castillo regarding access to defendants' panda doc account (.2); conference with J. del Castillo regarding access to defendants communication platforms (.1); correspondence with receiver's team regarding defendants' productions (.2); conference with Crowley's counsel and j. del castillo regarding production of GMD documents, debrief of same call (.5); correspondence with receiver's team regarding status of intuit document production (.1); initial review of defendants' fifth production (.3); review materials regarding potential additional receivership entity (.2); attempt to gain access to defendants' communication platforms (.3); revise notice of designation letter to additional receivership entity (.4); review analysis from receiver's accountant regarding potential additional receivership entities (.6).	Kebeh, Alphamorlai "Mo"	2.90	1,592.10	47,894.40	WO	HD	TR	
10/22/24	9814908	Review report from Mercury regarding background information regarding receivership entity accounts (.1); conference with J. del Castillo regarding status of subpoenas and other related action items (multiple) (.6); correspondence with Intuit's counsel and FTC regarding document production status (.3); review data from Mercury regarding account transaction history (.2); attend to issues regarding possible Florida real estate asset	Kebeh, Alphamorlai "Mo"	2.00	1,098.00	48,992.40	WO	HD	TR	

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		(.1); analyze Intuit subpoena prepared by FTC (.1); attention to issues regarding Barclays production of subpoena documents (.3); attention to issues regarding intuit production of subpoena documents, memo to intuit's counsel regarding additional receivership entities (.3).							
10/22/24	9815280	Emails and teleconferneces with M. Kebeh, Receiver's office, and FTC regarding pending discovery efforts and document turnover and review (1.0).	Del Castillo, Joshua	1.00	805.50	49,797.90	WO	HD	TR
10/23/24	9816129	Correspondence with Truist Bank regarding response to subpoena and production timeline (.2); review defendants' sixth document production, correspondence with receiver's team regarding summary of same (.3); correspondence with J. del Castillo regarding issues accessing defendant's communication platforms (.2); review explanation from Mercury team regarding account activity regarding suspected receivership funds (.1); attend to issues regarding FTC delivery of accumulated document production (.1); review correspondence from FTC regarding analysis of UBS account turnover issues (.1); review analysis of continued solicitation activities on behalf of defendants (.2); attempting access to defendants' communication platforms per provided credentials, notation of failed outcomes (.4); memo to J. del castillo regarding analysis of communication platform access issue,	Kebeh, Alphamorlai "Mo"	2.20	1,207.80	51,005.70	WO	HD	TR

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		correspondence with defendants' counsel regarding same (.6).							
10/23/24	9816332	Emails and teleconferences with Receiver's office and M. Kebeh regarding discovery and document production matters (1.2).	Del Castillo, Joshua	1.20	966.60	51,972.30	WO	HD	TR _____
10/24/24	9818095	Review and respond to email from M. Kebeh and defendants' counsel regarding communications access (0.2).	Del Castillo, Joshua	0.20	161.10	52,133.40	WO	HD	TR _____
10/24/24	9831741	Prepare second batch of subpoenas (1.0); memo to intuit's counsel regarding production of documents issue, review prior correspondence and subpoena in connection with same (.6).	Kebeh, Alphamorlai "Mo"	1.60	878.40	53,011.80	WO	HD	TR _____
10/25/24	9818980	Review FTC correspondence regarding document productions and emails with Receiver's office and B. Landau regarding same (0.5); review draft subpoenas and confer with M. Kebeh regarding same (0.5); review and follow-up regarding correspondence from defense counsel regarding recent productions (0.4).	Del Castillo, Joshua	1.40	1,127.70	54,139.50	WO	HD	TR _____
10/25/24	9819667	Investigate potential receivership entity connection (MAIB) (.2); review report and analysis from receiver's team regarding additional Receivership entity web hosting platform (.3); review Kraken counsel's objection to subpoena, consider issues and correspondence with J. del castillo regarding same (.3); continue preparation and finalizing second round of subpoenas, including analysis of subpoena targets'	Kebeh, Alphamorlai "Mo"	2.40	1,317.60	55,457.10	WO	HD	TR _____

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		connection to receivership entities (1.5); correspondence with receiver regarding progress regarding second round of subpoenas (.1).							
10/27/24	9819857	Emails with Receiver and M. Kebeh regarding document recovery and discovery matters (0.5).	Del Castillo, Joshua	0.50	402.75	55,859.85	WO	HD	TR
10/27/24	9831755	Review receivership team invoice for September 2024 (.1); attempt review of JPMorgan production per subpoena (.2); analyze bank of america response to subpoena (.2); review of production from subpoena recipient banks (.5).	Kebeh, Alphamorlai "Mo"	1.00	549.00	56,408.85	WO	HD	TR
10/28/24	9820923	Correspondence with M. Stefani regarding analysis of produced documents (.2); initial review of west coast escrow production, correspondence with M. Pham and receiver's team regarding same (.3); analyze production from Herpy/HDC (.8); correspondence with J. del Castillo regarding privilege issues in connection with analysis (.1); preliminary analysis of larchmont escrow production, correspondence with receiver's team regarding same (.7); analyze letter correspondence from UBS regarding setoff rights against bank account (.4); memo to J. del Castillo regarding status of sent, finalized, and forthcoming subpoenas (.4); finalizing second round of subpoenas (.7); attention to Kraken/Payward subpoena dispute, correspondence with receiver's team regarding same (.3); begin draft of	Kebeh, Alphamorlai "Mo"	4.30	2,360.70	58,769.55	WO	HD	TR

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		letter correspondence to marketing platforms regarding cooperation with allegedly defrauded consumers (.4).							
10/28/24	9822868	Emails with FTC and receivership team regarding outstanding productions, etc. (0.4); follow-up videoconference with FTC (0.5); confer with M. Kebeh regarding outstanding discovery and review materials regarding same (0.5); review documents and prepare outline for first interim report (0.5).	Del Castillo, Joshua	1.90	1,530.45	60,300.00	WO	HD	TR
10/29/24	9823968	Emails with AM counsel, Receiver's office, and outside counsel for non-parties regarding pending discovery and document turnover demands (0.8); review and revise draft meet and confer letter to Intuit counsel (0.3); review emails and confer with M. Kebeh regarding request for documents from FTC (0.2); review and respond to emails regarding request for documents to FTC (0.2).	Del Castillo, Joshua	1.50	1,208.25	61,508.25	WO	HD	TR
10/30/24	9824964	Conference with M. stefani regarding review of document production (herpy) (.2); attention to issue regarding service of subpoena on TX facility owner (Walzon) (.2); correspondence with receiver team regarding additional subpoena target (slack) (.1); correspondence with Inuit's counsel regarding production issue, analysis of Intuit's response and correspondence with J. del Castillo and Receiver's team regarding same (.4); review demand letter sent to mashreq bank (.1); investigate	Kebeh, Alphonse "Mo"	1.60	878.40	62,386.65	WO	HD	TR



11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		status of CFSB document production (.1); review of receivership action item status in preparation for meeting with J. del Castillo regarding drafting first interim report (.3); correspondence with receiver's team regarding status of JLL Facility's inventory (.2).							
10/30/24	9825463	Confer with Receiver's office and M. Kebeh regarding discovery, outstanding subpoenas,a notice of default related issues (0.9); review notes and prepare outline of first interim report for discussion with M. Kebeh (1.4); follow-up emails regarding same (0.2).	Del Castillo, Joshua	2.50	2,013.75	64,400.40	WO	HD	TR
10/31/24	9827711	Review M. Stefani summary of documents and confer regarding same (0.2); emails to Receiver's office regarding document productions and review (0.2); emails with M. Kebeh regarding outstanding FTC requests for materials (0.4); teleconference with M. Kebeh regarding interim report (0.3).	Del Castillo, Joshua	1.10	886.05	65,286.45	WO	HD	TR
10/31/24	9831801	Correspondence with J. del Castillo regarding status of bank production and sharing production with FTC (.2); correspondence with Receiver's accountant regarding supplementary summaries of reviewed document productions and status of forthcoming productions (.4); review of production from First Foundation Bank, correspondence with receiver team regarding same (.6); preliminary analysis of defendants 10/31 and 10/31 productions (.9); analyze records for CFSB production	Kebeh, Alphamorlai "Mo"	2.80	1,537.20	66,823.65	WO	HD	TR

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Fees for Matter 395682.00004.(Investigation & Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		per FTC request, correspondence with FTC regarding same (.5); attention to NFCU forensic accounting analysis issue (.2).					

**Disbursements for Matter 395682.00004 (Investigation & Reporting)**

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
10/03/24	2902873	BW – Duplication - Black & White Copies	133.00	25.27	WO	HD	TR	_____
10/03/24	2904057	MSNGR – Federal Express - Ship To: Attn Lourdes Martinez - JLL Industrial Property Manage	0.00	35.94	WO	HD	TR	_____
10/10/24	2905642	MSNGR – Federal Express - Ship To: BARCLAYS BANK PLC - BARCLAYS BANK PLC	0.00	67.95	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001842	Del Castillo, Joshua	40.30	805.50	32,461.65
002307	Peng, Simona	0.50	391.50	195.75
002510	Pham, Matt D.	8.50	616.50	5,240.25
002557	Stefani, Madeline	1.20	315.00	378.00
002661	Kebeh, Alphamorlai "Mo"	52.00	549.00	28,548.00
		102.50		\$66,823.65
Subtotal Fees				\$66,823.65
Discount				0.00
Total Fees				66,823.65
Total Disbursements				129.16

**Attorney Billing Instructions**

( )	BILL ALL	( )	Hold
( )	BILL FEES ONLY	( )	Write Off
( )	BILL COST ONLY	( )	Transfer All

11/04/24 13:37:10 PROFORMA STATEMENT FOR MATTER 395682.00004 (Donell, Stephen J. (Receiver)) (Investigation & Reporting)

**Billing Instructions**

expires 6/30/2025:: 10% off standard rates (automatic)

**Account Summary – As Of 11/01/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	66,586.05	66,586.05	0.00	66,715.21	66,586.05	129.16	66,715.21	66,586.05	129.16
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>Balance</b>	<b>66,715.21</b>	<b>66,586.05</b>	<b>129.16</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Donell, Stephen J. (Receiver)  
12121 Wilshire Boulevard, Suite 1120  
Los Angeles, CA 90025

11/04/24 13:37:12 PROFORMA STATEMENT FOR MATTER 395682.00005 (Donell, Stephen J. (Receiver)) (Consumer / Creditors Issues & Communicat)

**Preliminary Billing Form**

Billing Atty: 001842 - Del Castillo,  
Joshua

Matter #: 395682.00005

Client Name: Donell, Stephen J. (Receiver)

Date of Last Billing:

Matter Name: Consumer / Creditors Issues & Communicat

Proforma Number: 1302250

Client/Matter Joint Group # 395682.1

Client Matter Number:

**Fees for Matter 395682.00005.(Consumer / Creditors Issues & Communicat)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/24/24	9781148	Review and respond to consumer emails (0.4); confer with M. Kebeh regarding discussion with consumer E. Johann (0.2); preliminary review of materials transmitted by consumer (0.6).	Del Castillo, Joshua	1.20	966.60	966.60	WO	HD	TR
10/04/24	9794423	Review and respond to emails from allegedly defrauded consumers (0.5).	Del Castillo, Joshua	0.50	402.75	1,369.35	WO	HD	TR
10/08/24	9798711	Teleconference and email with consumer J. Rosado (0.3).	Del Castillo, Joshua	0.30	241.65	1,611.00	WO	HD	TR
10/09/24	9799642	Review and respond to inquiry from consumer Shelton and confer with AM counsel (0.2).	Del Castillo, Joshua	0.20	161.10	1,772.10	WO	HD	TR
10/30/24	9825070	Emails and teleconference with consumer McCrary and follow-up with Receiver regarding same (0.6).	Del Castillo, Joshua	0.60	483.30	2,255.40	WO	HD	TR
10/30/24	9833823	Tel. conf. with allegedly defrauded consumer regarding status of receivership, correspondence regarding same (.2).	Kebeh, Alphamorlai "Mo"	0.20	109.80	2,365.20	WO	HD	TR

11/04/24 13:37:12 PROFORMA STATEMENT FOR MATTER 395682.00005 (Donell, Stephen J. (Receiver)) (Consumer / Creditors Issues &amp; Communicat)

**Proforma Summary****Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001842	Del Castillo, Joshua	2.80	805.50	2,255.40
002661	Kebeh, Alphamorlai "Mo"	0.20	549.00	109.80
		<u>3.00</u>		<u>\$2,365.20</u>
Subtotal Fees				\$2,365.20
Discount				0.00
Total Fees				2,365.20
Total Disbursements				0.00

**Attorney Billing Instructions**

( )	BILL ALL	( )	Hold
( )	BILL FEES ONLY	( )	Write Off
( )	BILL COST ONLY	( )	<u>Transfer All</u>

**Billing Instructions**

expires 6/30/2025:: 10% off standard rates (automatic)

**Account Summary – As Of 11/01/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,687.40	2,687.40	0.00	2,687.40	2,687.40	0.00	2,687.40	2,687.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>2,687.40</b>	<b>2,687.40</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									

11/04/24 13:37:12 PROFORMA STATEMENT FOR MATTER 395682.00005 (Donell, Stephen J. (Receiver)) (Consumer / Creditors Issues & Communicat)

***Client Trust***                      ***0.00***  
***Balance***

---

**Billing Address**

Donell, Stephen J. (Receiver)  
12121 Wilshire Boulevard, Suite 1120  
Los Angeles, CA 90025

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# **EXHIBIT 3**



MARKOWITZ  
RINGEL  
TRUSTY +  
HARTOG  
ATTORNEYS AT LAW

# INVOICE

Markowitz, Ringel, Trusty & Hartog, P.A.  
Two Datan Center, Suite 1800, 9130 South Dadeland Boulevard  
Miami, FL - Florida 33156-7858

Invoice #: 37933  
Date: 09-30-2024

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Stephen Donell

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Matter Number:240708-Federal Trade Commission v Ascend Capventures, Inc., et al.

Steve.Donell@fedreceiver.com

## For Services Rendered

Date	Atty	Description	Quantity	Rate	Total
09-14-24	ARR	Emails and conferences with D. Donell and FTC agents.	0.50	500.00	\$250.00
09-15-24	ARR	Emails and conferences with S. Donell and FTC agents regarding new matter.	0.50	500.00	\$250.00
09-15-24	ARR	Analysis of complaint, motion for TRO and TRO order.	0.90	500.00	\$450.00
09-16-24	ARR	Travel to/from and attend service of process of FTC order, and coordinate with law enforcement regarding same.	4.00	500.00	\$2,000.00
09-16-24	ARR	Email Receiver and J. Goodman regarding photographs from site visit.	0.10	500.00	\$50.00

For Services Rendered Subtotal: \$3,000.00

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Subtotal	\$3,000.00
Tax	\$0.00
Total	\$3,000.00
Payment	\$0.00
Balance Owing	\$3,000.00

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Timekeeper Summary

Name	Initials	Hours	Rate	Total
Alan Rosenberg	ARR	6.00	500.00	\$3,000.00
<b>Total</b>		<b>6.00</b>		<b>\$3,000.00</b>

Trust Account Balance \$0.00

Total Client Balance \$3,000.00

Total Matter Balance \$3,000.00

Due Upon Receipt.

Please remit payment to Markowitz, Ringel, Trusty & Hartog, P.A. via check, money order, cashier's check, ACH, or credit card. If you wish to pay by credit card or ACH, please click on the link below to process your payment. You can also contact our office at 305-670-5000 or email our billing department at [dlightfritz@mrthlaw.com](mailto:dlightfritz@mrthlaw.com). Thank you.

<https://secure.lawpay.com/pages/markowitzringeltrustyhartog/trust>

Tax ID: 59-2325782

# **EXHIBIT 4**



700 N Pearl St  
Ste 1610  
Dallas, TX 75201-7459  
Phone: (214) 377-7879  
Fax: (214) 377-9409

Stephen Donell - FedReceiver Inc.  
12121 Wilshire Blvd., Suite 1120  
CA 90025

## Invoice

Invoice Date: 10/1/2024  
Invoice No: 3122

Matter: 00431-001

Re: 00431-001 Donell - FedReceiver Inc. Ascend Capventures Inc.

### Professional Fees

Date	Description	Hours	Amount	Lawyer
09/15/2024	Run conflicts for J. Binford; open matter for time entry and circulate to team info regarding same.	1.30	\$195.00	CE
09/15/2024	Telephone conference with J. Binford, S. Donnell, J. Goodman, D. Brou; review emails regarding Ascend matter; review court order; TEAMS meeting with J. Goodman, D. Brou, and B. McPeck; telephone conference with S. Donnell.	2.50	\$1,625.00	FS
09/15/2024	Telephone conference with J. Binford to discuss receivership and possession of property at Grand Prairie warehouse facilities; review order granting TRO and appointing receiver.	0.50	\$300.00	CR
09/15/2024	Prepare for and participate in initial matter discussions with S. Donell and representatives of the FTC; exchange multiple emails discussing initial issues.	2.80	\$1,820.00	JB
09/16/2024	Telephone conferences with J. Binford and C. Eary regarding execution on receivership property.	0.30	\$180.00	CR
09/16/2024	Print out 3 different documentation to take with us to location with police and FTC agent in Grand Prairie; go to Kinkos to get 2 more documents printed out to take to agent before seizure at 941-A; get locksmith lined up before surprise visit; videotape seizure; take pictures at seizure; take notes; coordinate locksmith to be let go from location after front door gets changed out; phone calls with J. Gitlin on coordinating going back on Tuesday with keys so we can sit with tenant until an FTC Agent gets there.	8.00	\$1,200.00	CE
09/16/2024	Review orders appointing receiver (1.0); review and print asset freeze letters (.5); review and respond to multiple emails coordinating takeover of space at 941B Avenue N in Grand Prairie (1.0); meet with Grand Prairie law enforcement and Brent Meeks to plan and carry out take over of warehouse (4.0); telephone conferences with Joshua Del Castillo (.3); emails to Stephen Donnell (.1); telephone conference with J. Gitlin (.2).	7.10	\$4,615.00	FS
09/16/2024	Telephone conferences and email exchanges with F. Smith and J. Gitlin regarding status of the warehouse and follow up issues.	0.50	\$325.00	JB
09/17/2024	Exchange emails with F. Smith and J. Gitlin regarding status.	0.50	\$325.00	JB

09/17/2024	Traveled to Warehouse to stay at 941A in Grand Prairie until Receiver gets there; took in packages from UPS, FED EX, other local drivers and placed them in warehouse; spoke to Carolyn Kellis client manager along with Penny Howard property manager; took videos of walk through with client; took videos of Steve, Elsie and Jonthan speaking to Nikita Loktev; lined up interpreter for Elsie and Steve to speak to Nikita that lasted 1.5 hours.	8.80	\$1,320.00	CE
09/17/2024	Review case & relevant court filings; conferences with staff re: case; inspect property and inventory; phone conference with coordinate counsel F. Smith re: case; phone conference with coordinate counsel J. del Castillo re: case; conferences with client re: case; conferences with FTC personnel re: case and property; conferences with local property staff and interpreter re: case.	9.10	\$4,777.50	JG
09/18/2024	Email to property manager with update; telephone conference with J. Gitlin regarding update.	1.30	\$845.00	FS
09/18/2024	Coordinate with J. Gitlin on compiling photos and videos so we could download all of our photos and videos that were taken on September 16th and September 17th while visiting 941 A location; circulate photos and videos to S. Donell, J. Del Castillo for them to have.	3.00	\$450.00	CE
09/18/2024	Conference calls with J. Gitlin and F. Smith discussing current status of the matter and review email correspondence regarding same.	0.60	\$390.00	JB
09/18/2024	Review case; phone conference with coordinate case J. Binford re: case and next steps; conference with staff re: same and transfer of pictures and media to client; review case and notes from prior day's inspection; conference with staff re: photos & videos of location and question/answer session; phone conference with coordinate counsel F. Smith re: case and next steps; review case; conference with staff re: documentation, pictures, and movies of site visit and interview.	1.60	\$840.00	JG
09/19/2024	Send email with link to client and client's counsel regarding photos and videos taken from Monday and Tuesday being at the warehouse for them to review.	0.10	\$15.00	CE
09/19/2024	Review case; phone conference with client re: case and next steps; review case; email correspondence with client rep re: same.	0.40	\$210.00	JG
09/20/2024	Review case; email correspondence with coordinate counsel J. del Castillo re: case and receiver's report.	0.10	\$52.50	JG
		<b>48.50</b>	<b>\$19,485.00</b>	

#### Disbursements

Date	Description	Amount
	Printing and Photocopies	\$174.05
09/16/2024	Copies at FedEx.	\$9.54
09/16/2024	Locksmith for Grand Prairie warehouse.	\$582.00
09/16/2024	Lunch for F. Smith and C. Eary.	\$44.88
		<b>\$810.47</b>

#### Fee Earner Summary

Fee Earner	Total Time	Rate	Total
Casey Eary	21.2	\$150.00	\$3,180.00
Frances Smith	10.9	\$650.00	\$7,085.00
Casey Roy	0.8	\$600.00	\$480.00
Jason Binford	4.4	\$650.00	\$2,860.00
Jonathan Gitlin	11.2	\$525.00	\$5,880.00

Invoice Amount: \$20,295.47

Tax ID Number: LEDES462001231



700 N Pearl St  
Ste 1610  
Dallas, TX 75201-7459  
Phone: (214) 377-7879  
Fax: (214) 377-9409

Stephen Donell - FedReceiver Inc., Alphamorlai Kebeh, Joshua  
del Castillo, Cyrus Ansari & Penny Howard  
12121 Wilshire Blvd., Suite 1120  
CA 90025

## Invoice

Invoice Date: 11/1/2024  
Invoice No: 3200

Matter: 00431-001

Re: 00431-001 Donell - FedReceiver Inc., Kebeh, del Castillo, Ansari &  
Howard, Ascend Capventures Inc.

### Professional Fees

Date	Description	Hours	Amount	Lawyer
10/04/2024	Emails with S. Donell regarding inventory in warehouse and other assets.	0.20	\$130.00	FS
10/11/2024	Review email from C. Ansari regarding Avenue N lease property.	0.10	\$65.00	FS
10/23/2024	Review and respond to email from Cyrus Ansari regarding Avenue N Lease payments.	0.40	\$260.00	FS
10/24/2024	Review TRO and extension; email to C. Ansari regarding TRO extension and Preliminary Injunction; review and respond to emails from J. Del Castillo; telephone conference with Receiver re: same.	0.50	\$325.00	FS
10/24/2024	Review case; review correspondence between counsel.	0.10	\$52.50	JG
		<b>1.30</b>	<b>\$832.50</b>	

### Fee Earner Summary

Fee Earner	Total Time	Rate	Total
Frances Smith	1.2	\$650.00	\$780.00
Jonathan Gitlin	0.1	\$525.00	\$52.50

Invoice Amount: \$832.50

Tax ID Number: LEDES462001231

# **EXHIBIT 5**



A Division of SingerLewak

September 30, 2024

FTC v Ascend Capventures, Inc.  
c/o Steve Donell  
12121 Wilshire Boulevard, Suite 1120  
Los Angeles, CA 90025

Client No. PGM3032708  
Invoice: 495435

Professional services rendered through September 30, 2024

Prior Balance Forward	\$	0.00
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Billing for professional services rendered in September in connection with the following:

• Initial calls and review of pleadings	\$	3,923.50
• Work related to asset freezes and general tracing	\$	3,283.00
• Real estate tracing	\$	2,291.00
• Eaglemont Capital tracing analysis	\$	4,202.00
• Other miscellaneous work and consultation	\$	2,200.00
• Global Marketing, Inc. tracing analysis	\$	2,937.00
• Ascend CC, Inc. tracing analysis	\$	935.00

See detail of time attached

Current Amount Due	\$	<u>19,771.50</u>
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Total Amount Due	\$	<u>19,771.50</u>
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Payable Upon Receipt - Thank You

Exhibit 5  
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**FTC V ASCEND CAPVENTURES, INC.**  
**PGM3032708**

DATE	STAFF	DESCRIPTION	HOURS	AMOUNT
9/16/2024	Sam Biggs	Review Order and supplemental information and other information on amend entities and principals.	0.8	556.00
9/16/2024	Sam Biggs	Phone Receiver regarding case issues and handling.	0.3	208.50
9/17/2024	Sam Biggs	Conference call with Deirdre Brow, et al regarding FTC documents, actions and to consult on work.	0.6	417.00
9/17/2024	Sam Biggs	Review various FTC and other documents and work on case set up.	0.6	417.00
9/17/2024	Sam Biggs	Review FTC case files regarding entities, individuals, litigation, banking, etc. to identify bank accounts to freeze, entities to charge and other sources for recovery of funds.	2.0	1,390.00
9/17/2024	Sam Biggs	Conference call with Josh, Sarah, Brian regarding bank accounts to freeze, recovery action, etc.	0.5	347.50
9/17/2024	Brian Landau	Call with Joshua at Allen Matkins regarding status	0.5	275.00
9/17/2024	Brian Landau	Call with Deirdre from FTC regarding documents provided and status	0.5	275.00
9/17/2024	Brian Landau	Reviewed complaint and receivership order.	1.2	660.00
9/17/2024	Brian Landau	Call with Sarah Bates regarding bank account freezes	0.5	275.00
9/17/2024	Brian Landau	Went through excel workbooks prepared by FTC on activity.	0.5	275.00
9/18/2024	Brian Landau	Call with Sarah regarding bank accounts and other items	0.4	220.00
9/18/2024	Brian Landau	Call with Steve regarding status	0.3	165.00
9/18/2024	Brian Landau	Downloaded file and reviewed schedule of real state, reviewed ownership of Grand Property	0.8	440.00
9/19/2024	Brian Landau	Call with Receiver and FTC	1.0	550.00
9/19/2024	Brian Landau	Setup analysis of Edgemont Capital LLC sources and uses of funds	0.9	495.00
9/19/2024	William Padden	Categorize cash transactions by payee / payor for Eaglemont Capital accounts # 5179 and # 0595.	1.4	539.00
9/19/2024	William Padden	Complete summary cash schedule for Eaglemont Capital. Review deposit slips and checks for "unknown" transactions.	1.2	462.00

**FTC V ASCEND CAPVENTURES, INC.**  
**PGM3032708**

DATE	STAFF	DESCRIPTION	HOURS	AMOUNT
9/19/2024	Sam Biggs	Review and consult on asset searches, work to freeze and recover cash and properties.	0.5	347.50
9/20/2024	Brian Landau	Went through Eaglemont analysis and emailed parties regarding same.	1.4	770.00
9/20/2024	William Padden	Finalize Eaglemont Capital cash analysis.	2.2	847.00
9/20/2024	William Padden	Review and organize escrow payments from all accounts and entities.	1.8	693.00
9/20/2024	William Padden	Condense Eaglemont Capital cash analysis and review.	2.4	924.00
9/23/2024	Brian Landau	Went through escrow payment schedule and emailed to Steve abd Sarah.	1.0	550.00
9/24/2024	Sam Biggs	Work on analysis of real properties, bank accounts, etc. for recovery.	0.4	278.00
9/24/2024	Brian Landau	Call with Steve ad Josh regarding updates	0.4	220.00
9/24/2024	Brian Landau	Review global marketing activity in ftc database.	0.5	275.00
9/25/2024	Brian Landau	Call and status update with the FTC.	0.9	495.00
9/25/2024	Brian Landau	Respond to email from Josh C. regarding Grand property profit and tracing	0.2	110.00
9/25/2024	Brian Landau	Email regarding 4321 secret place to Josh C	0.4	220.00
9/25/2024	Sam Biggs	Consult on work to trace assets, secure real property and other assets.	0.4	278.00
9/26/2024	Brian Landau	Prepared schedule of payments to Payward Ventures and discuss with Sarah regarding same	1.5	825.00
9/26/2024	Brian Landau	Call with UBS regarding subpoena response and account verification information.	0.5	275.00
9/26/2024	Brian Landau	Searched through FTC database for additional accounts and transfers related to assets that have not yet bene frozen, discussed with Sarah regarding same	1.5	825.00
9/27/2024	Brian Landau	Email regarding CoindBase records	0.3	165.00
9/27/2024	Brian Landau	Went through BOA documents regarding Global Marketing emailed regarding balances in accounts as of August 2024.	0.5	275.00
9/27/2024	William Padden	Begin to review Global Marketing bank of America accounts.	1.0	385.00
9/27/2024	Brian Landau	Email to Steve regarding crypto accounts.	0.2	110.00
9/30/2024	William Padden	Categorize Global Marketing Bank of America transactions by payee and Payor.	2.8	1,078.00

**FTC V ASCEND CAPVENTURES, INC.****PGM3032708**

<b>DATE</b>	<b>STAFF</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>
9/30/2024	William Padden	Review unknown transactions and update per deposits slips and check memos.	1.2	462.00
9/30/2024	William Padden	Reconcile cash transfers from Global Marketing to Eaglemont and Paradyme.	0.4	154.00
9/30/2024	William Padden	Categorize all bill.com cash deposits into Global Marketing.	0.8	308.00
9/30/2024	Brian Landau	Call with Josh regarding tasks needed	0.4	220.00
9/30/2024	Brian Landau	Call with Moe regarding cast of characters	0.2	110.00
9/30/2024	Brian Landau	Worked on entity listings and initial trace of funds to ftc database	1.1	605.00
<b>TOTAL</b>			<b>38.9</b>	<b>19,771.50</b>



A Division of SingerLewak

October 31, 2024

FTC v Ascend Capventures, Inc.  
c/o Steve Donell  
12121 Wilshire Boulevard, Suite 1120  
Los Angeles, CA 90025

Client No. PGM3032708  
Invoice: 498833

Professional services rendered through October 31, 2024

Prior Balance Forward \$ 19,771.50

Billing for professional services rendered in October in connection with analysis of cash sources and uses, asset tracking, review of related party transactions, identification of cash inflows and outflows, and preparation of detailed reports on cash flow activities to aid in asset recovery per per detail attached as follows:

• Paradyme Capital	\$ 6,814.50
• Eaglemont Capital	\$ 9,212.50
• Global Marketing, Inc.	\$ 3,366.00
• Ascend CC, Inc.	\$ 4,328.50
• AC Ventures	\$ 5,087.50
• 89CLTV, LLC	\$ 1,045.00
• Ascend Ecom, LLC	\$ 4,963.50
• Form 56 Preparation	\$ 409.00
• Inventorying, arranging, and indexing documents, etc.	\$ 9,900.00
• Other	\$ 5,439.00

Current Amount Due \$ 50,565.50

Total Amount Due \$ 70,337.00

Payable Upon Receipt - Thank You

10960 Wilshire Blvd., Suite 1100, Los Angeles, California 90024 | T: 310.477.3924 | F: 310.478.6070

Exhibit 5  
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FTC V ASCEND CAPVENTURES, INC.  
PGM3032708

DATE	STAFF	DESCRIPTION	HOURS	TOTAL	RATE
10/8/2024	William Padden	Update Paradyme Capital cash summary.	2.0	770.00	385.00
10/8/2024	William Padden	Record UBS Paradyme Capital activity.	1.4	539.00	385.00
10/8/2024	Brian Landau	Worked on Paradyme analysis with WP.	0.5	275.00	550.00
10/8/2024	Brian Landau	Call with Jody regarding Paradyme accounting.	0.2	110.00	550.00
10/9/2024	William Padden	Include UBS activity in master transaction schedule for Paradyme Capital.	1.8	693.00	385.00
10/10/2024	Brian Landau	Reviewed Paradyme transfers	0.6	330.00	550.00
10/10/2024	William Padden	Clean up and format Paradyme Capital cash summary.	1.8	693.00	385.00
10/11/2024	Brian Landau	Worked on Paradyme analysis and tracing of proceeds	1.8	990.00	550.00
10/11/2024	Brian Landau	Went through summary of Paradyme Capital resolved further review items and emailed.	1.0	550.00	550.00
10/11/2024	William Padden	Reconcile internal bank transfers for Paradyme Capital. Update and condense schedule.	2.5	962.50	385.00
10/11/2024	William Padden	Review UBS stock values and unknown transfers.	1.2	462.00	385.00
10/14/2024	Brian Landau	Call with FTC regarding Paradyme Capital	0.8	440.00	550.00
<b>Paradyme Capital Inc.</b>			<b>15.6</b>	<b>6,814.50</b>	
10/3/2024	Brian Landau	Worked on Eaglemont account , reviewed ubs production and Barclays transfer	1.4	770.00	550.00
10/5/2024	Brian Landau	Call with Elsie on Eaglemont	1.0	550.00	550.00
10/15/2024	William Padden	Update Eaglemont Capital cash summary. Condense unknown transactions for Chase and Charles Schwab.	2.0	770.00	385.00
10/16/2024	William Padden	Record Eaglemont Capital UBS bank activity.	2.8	1,078.00	385.00
10/16/2024	William Padden	Review unknown Eaglemont UBS transactions.	2.0	770.00	385.00
10/16/2024	William Padden	Review Coinbase and wise accounts for Eaglemont.	1.4	539.00	385.00
10/16/2024	William Padden	Update Eaglemont Capital cash summary.	1.8	693.00	385.00
10/24/2024	William Padden	Incorporate all Eaglemont Capital UBS bank activity into cash summary.	2.5	962.50	385.00
10/24/2024	William Padden	Record Eaglemont Capital Charles Schwab bank activity.	2.4	924.00	385.00
10/24/2024	William Padden	Continue updating and formatting payee / payor names for the Eaglemont Capital cash summary.	1.8	693.00	385.00
10/25/2024	Brian Landau	Compiled foreign bank activity for Eaglemont and emailed to Sarah	0.7	385.00	550.00
10/25/2024	William Padden	Reconcile Eaglemont Capital internal cash transfers.	1.4	539.00	385.00
10/25/2024	William Padden	Update and format Eaglemont Capital cash summary.	1.4	539.00	385.00
<b>Eaglemont Capital</b>			<b>22.6</b>	<b>9,212.50</b>	
10/1/2024	Brian Landau	Reviewed and updated sources and use draft analysis - Global Marketing	1.5	825.00	550.00
10/1/2024	William Padden	Complete cash summary for Global Marketing Development. Review and update unknown transactions.	2.8	1,078.00	385.00
10/1/2024	William Padden	Reconcile Global Marketing bank statements. Review and format cash summary.	1.8	693.00	385.00
10/23/2024	William Padden	Update cash summary for Global Marketing Development.	2.0	770.00	385.00
<b>Global Marketing Inc</b>			<b>8.1</b>	<b>3,366.00</b>	
10/3/2024	William Padden	Complete draft of cash summary for Ascend CC Inc.	2.5	962.50	385.00
10/3/2024	William Padden	Review unknown transactions included in Ascend CC cash summary.	1.2	462.00	385.00

**FTC V ASCEND CAPVENTURES, INC.**  
**PGM3032708**

10/4/2024	Sam Biggs	Work on crypto currency transactions and investigation of tracing methods.	0.4	278.00	695.00
10/16/2024	Brian Landau	Reviewed Payward Ventures transfers from Ascend CC and discusses with Sarah B	0.5	275.00	550.00
10/25/2024	Brian Landau	Worked on Payward Ventures Rec and tracing - Ascend CC	0.5	275.00	550.00
10/25/2024	William Padden	Complete summary of Payward Ventures payments from Ascend CC Inc.	2.2	847.00	385.00
10/23/2024	Brooke Savage	Worked on Ascend CC Inc cash summary, adding bank account numbers to corresponding debits and credits.	3.0	690.00	230.00
10/23/2024	William Padden	Update uncategorized transactions for Ascend CC.	1.4	539.00	385.00
<b>Ascend CC, Inc.</b>			<b>11.7</b>	<b>4,328.50</b>	
10/21/2024	Brian Landau	Email to Josh regarding AC Global Ventures	0.2	110.00	550.00
10/21/2024	William Padden	Categorize bank activity by payee for AC Ventures Global.	2.2	847.00	385.00
10/21/2024	William Padden	AC Ventures Global: Review and confirm unknown wire transfer names and bank accounts.	1.5	577.50	385.00
10/22/2024	William Padden	Update and format AC Ventures Global cash summary.	2.2	847.00	385.00
10/22/2024	William Padden	AC Ventures Global: Include bank accounts for related parties.	0.8	308.00	385.00
10/22/2024	William Padden	Review AC Ventures Global cash summary. Reconcile transfers to other analyzed entities.	1.8	693.00	385.00
10/23/2024	Brian Landau	Went through AC Ventures Global accounting with WP, updated for Mercury and Wise transfers; emailed to Josh and Steve.	1.1	605.00	550.00
10/30/2024	Brian Landau	Worked on ascend ventures analysis including Navy FCO information	2.0	1,100.00	550.00
<b>AC Ventures Global, Inc.</b>			<b>11.8</b>	<b>5,087.50</b>	
10/16/2024	Brian Landau	Prepared cash receipts and disbursements analysis of 89CLTV and emailed to Steve and Josh.	1.5	825.00	550.00
10/22/2024	Brian Landau	Email regarding property in Florida purchase through 89CLTV	0.4	220.00	550.00
<b>89CLTV LLC</b>			<b>1.9</b>	<b>1,045.00</b>	
10/7/2024	William Padden	Categorize Ascend Ecom LLC bank activity by payee.	2.5	962.50	385.00
10/10/2024	Brian Landau	Went through Ascend Ecom LLC analysis with Will	0.7	385.00	550.00
10/10/2024	William Padden	Continue Ascend Ecom LLC cash summary.	2.4	924.00	385.00
10/10/2024	William Padden	Set up cash summary of deposits and disbursements for Ascend Ecom.	2.0	770.00	385.00
10/10/2024	William Padden	Clean up and format Ascend Ecom LLC.	1.8	693.00	385.00
10/23/2024	Brooke Savage	Worked on Ascend Ecom LLC cash summary, adding bank account numbers to corresponding debits and credits.	3.0	690.00	230.00
10/23/2024	William Padden	Update uncategorized transactions for Ascend Ecom	1.4	539.00	385.00
<b>Ascend Ecom LLC</b>			<b>13.8</b>	<b>4,963.50</b>	
10/21/2024	Brian Landau	Setup Form 56 template and emailed to Sarah.	0.2	110.00	550.00
10/22/2024	Brooke Savage	Filled out Form 56 for all entities with known tax ID numbers.	1.0	230.00	230.00
10/23/2024	Brooke Savage	Put together Form 56 for Jeremy Leung	0.3	69.00	230.00
<b>Form 56 Preparation</b>			<b>1.5</b>	<b>409.00</b>	

**FTC V ASCEND CAPVENTURES, INC.  
PGM3032708**

10/2/2024	William Padden	Begin organizing various bank statements and documents received from FTC to the correct entity folder.	1.2	462.00	385.00
10/3/2024	Brooke Savage	Worked on combining Ascend bank statements and Global Marketing statements and added to bank account inventory schedule.	3.0	690.00	230.00
10/4/2024	Brooke Savage	Finished combing Ascend bank statements and Global Marketing Statements	2.0	460.00	230.00
10/4/2024	Brooke Savage	Sorted through deposited checks and put them into corresponding files based on entity.	2.0	460.00	230.00
10/7/2024	Brooke Savage	Sorted through various bank statements (2021 - 2023) and added various bank account statements to bank account inventory.	2.5	575.00	230.00
10/7/2024	Brian Landau	Went through statement inventory list with Brooke.	0.5	275.00	550.00
10/8/2024	Brooke Savage	Sorted through all Chase statements (2021 - 2024) and created folders for entities.	3.0	690.00	230.00
10/8/2024	Brooke Savage	Worked on bank account inventory.	2.5	575.00	230.00
10/8/2024	Brooke Savage	Combined Ascend bank records with their corresponding entity folders.	2.5	575.00	230.00
10/18/2024	Brooke Savage	Sorted through FTC downloads file and made sure there were no duplicates.	1.3	299.00	230.00
10/21/2024	Brooke Savage	Finished sorting all Ascend files into entity folders.	3.5	805.00	230.00
10/21/2024	Brooke Savage	Sorted all Ascend excel files with multiple entities into one Miscellaneous folder.	0.7	161.00	230.00
10/21/2024	Brooke Savage	Searched through the entity files to locate any known EIN numbers.	0.5	115.00	230.00
10/21/2024	Brooke Savage	Created folders for new entities discovered going through bank statements and sorting.	0.8	184.00	230.00
10/22/2024	Brooke Savage	Sorted through Wise bank excel files.	1.0	230.00	230.00
10/22/2024	Brooke Savage	Updated Ascend entity banking spreadsheet with EIN numbers and bank accounts.	2.5	575.00	230.00
10/23/2024	Brooke Savage	Began updating entity listing excel file with Mercury statements.	1.7	391.00	230.00
10/28/2024	Brooke Savage	Continued organizing entity and document listing excel file into one tab.	2.2	506.00	230.00
10/30/2024	Brooke Savage	Organized cells in entity and document listing excel file by color.	2.5	575.00	230.00
10/30/2024	Brooke Savage	Added EIN numbers to entity listing spreadsheet.	0.3	69.00	230.00
10/30/2024	Brooke Savage	Added September Mercury statements to bank listing excel file.	1.0	230.00	230.00
10/30/2024	William Padden	Review and update entity listing by bank account.	0.8	308.00	385.00
10/31/2024	Brooke Savage	Identified which months of Mercury statements are missing to be requested.	0.5	115.00	230.00
10/31/2024	Brooke Savage	Began looking through Mercury statements to see what should/could be added to entity listing document.	2.5	575.00	230.00
<b>Inventorying, arranging and indexing all documented provided by ftc and responses from subpoenas</b>			<b>41.0</b>	<b>9,900.00</b>	
10/2/2024	Brian Landau	Call with Mo regarding BOA asset freeze.	0.2	110.00	550.00
10/2/2024	Sam Biggs	Review various transactions and documents regarding determination of basis for recoveries.	0.6	417.00	695.00
10/3/2024	Brian Landau	Went through personal tax returns for Basta and Leung	0.5	275.00	550.00
10/7/2024	Brian Landau	Call with Josh regarding status	0.4	220.00	550.00
10/10/2024	Brian Landau	Status call with Steve and Josh	0.2	110.00	550.00



**FTC V ASCEND CAPVENTURES, INC.**

**PGM3032708**

10/14/2024	Brian Landau	Call with Sarah regarding UBS and other items	0.4	220.00	550.00
10/16/2024	Brian Landau	Email Mo regarding QB online turnover.	0.1	55.00	550.00
10/17/2024	Brian Landau				
		Reviewed initial interim report and emailed Josh regarding same	0.5	275.00	550.00
10/18/2024	Brian Landau	Email to Sarah regarding turnover of Coinbase funds	0.3	165.00	550.00
10/18/2024	Brian Landau	Email on intuit turnover.	0.1	55.00	550.00
10/21/2024	Sam Biggs	Review and consult on recovery issues.	0.4	278.00	695.00
10/22/2024	Brian Landau	Call with Sarah regarding Mercury accounts and tracing	0.4	220.00	550.00
10/22/2024	Brian Landau	Research Community FSB and tracing of funds to determine account numbers'	1.3	715.00	550.00
10/25/2024	Brian Landau	Pulled domain register and emailed	0.2	110.00	550.00
10/28/2024	William Padden	Review cash summaries for Wio Bank transactions.	1.2	462.00	385.00
10/28/2024	Brian Landau	Call with Sarah regarding Cloud Peak Law documents	0.3	165.00	550.00
10/28/2024	Brian Landau				
		Reviewed wire inform from Dubai and emailed regarding same	0.1	55.00	550.00
10/28/2024	Brian Landau	Emailed Josh regarding intuit production	0.2	110.00	550.00
10/29/2024	William Padden	Review entity listing. Make note of cash summaries to be further revised.	1.4	539.00	385.00
10/30/2024	Sam Biggs	Work on structuring recovery work regarding diversions to foreign accounts.	0.4	278.00	695.00
10/31/2024	Brian Landau	Reviewed doc production from defendants	0.6	330.00	550.00
10/25/2024	Brian Landau				
		Call regarding Navy production and other transactions with Sarah.	0.5	275.00	550.00

**Other 10.3 5,439.00**

**TOTAL AMOUNT 138.3 50,565.50**