UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

FEDERAL TRADE COMMISSION,	
Plaintiff,	
V.	Case No. 3:22-cv-00487-TJC-MCR
MICHAEL RANDO, VALERIE RANDO, PROSPERITY TRAINING	
TECHNOLOGY LLC, ELITE	
CUSTOMER SERVICES, LLC, DIGITAL BUSINESS SCALING	
LLC, FIRST COAST	
MATCHMAKERS INC.,	
FIRST COAST MATCHMAKERS	
LLC, FINANCIAL CONSULTING MANAGEMENT GROUP LLC,	
RESOURCE MANAGEMENT	
INVESTMENTS, LLC,	
Defendants.	

RECEIVER'S FIRST FEE APPLICATION FOR ORDER AWARDING FEES, COSTS, AND REIMBURSEMENT OF COSTS TO RECEIVER AND HER PROFESSIONALS

Maria M. Yip, the Court-appointed Temporary Receiver (the "Receiver") over the corporate Defendants (the "Receivership Entities"¹)

¹ The Receivership Entities include Prosperity Training Technology LLC, Elite Customer Services, LLC, Digital Business Scaling LLC, First Coast Matchmakers Inc., First Coast Matchmakers LLC, Financial Consulting Management Group LLC and Resource Management Investments, LLC.

pursuant to the Court's Order dated May 3, 2020 (Doc. 12) (the "TRO"), respectfully submits this First Quarterly Fee Application to the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and her professionals. This Application covers all fees and costs incurred from May 2, 2022 through July 1, 2022.

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

- Secured the Receivership Defendants' office in Jacksonville, Florida and took custody of the UPS mail boxes and storage unit utilized by the Defendants.
- Sent 20 turnover and preservation letters to known vendors, professionals associated with the Defendants, and financial institutions associated with the Defendants, with demands for financial information and asset freezes.
- Gathered thousands of documents at the Defendants' office and from non-parties, including banks, credit card companies, and merchant processors.

- Communicated with approximately 75 individuals, including former employees, and customers in order to obtain an understanding of the business operations and other pertinent information related to the Receivership.
- Took the necessary steps to secure and preserve the Receivership Defendants' information systems containing the Receivership Defendants' emails, file storage, telephone, customer resource management, and banking systems.
- Worked with forensic technology firm E-Hounds to secure and preserve data contained in computers, hard drives, mobile phones, emails, third party websites, and social media accounts, among others.
- Performed keyword searches using the E-Hounds electronic discovery platform as needed.
- Established a website with information for customers, employees and other interested parties at https://creditgamereceivership.com that includes pleadings, a registration mechanism and contact information for the Receiver and her counsel.
- Established a receivership email and segregated call-in process for consumers to communicate directly with the Receiver.
- Redirected the Receivership Defendants' main website,
 <u>www.creditgameu.com</u>, to the Receivership Website. Callers to the

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Corporate Defendants' telephone line were provided a message and information on the receivership website.

- Counsel for the Receiver took the deposition of Individual Defendants, Michael and Valerie Rando.
- Reviewed a sample of audio recordings of both inbound and outbound sales calls.
- Analyzed sales and marketing materials including sales scripts, and documents outlining program offerings, pricing information, and form letters for eliminating debt.
- Advanced payments on corporate expenses to cure existing debts and secure the assets of the Receivership.
- Researched potential related entities and identified potential non-Corporate Defendants.
- Analyzed the banking activity of the Receivership Defendants, including the activity in 14 bank accounts held at Fifth Third Bank, one bank account held at Truist, credit cards issued by American Express and Capital One. The analysis resulted in a database containing over 8,000 transactions covering a period of approximately three years.

- Performed various analyses of sources and uses of funds based on the banking activity database in order to identify potential assets and other recovery sources.
- Analyzed sales and merchant account activity to identify sales to consumers.
- Performed search for assets including public research to identify potential real estate properties.
- Quantified the assets and liabilities of the Receivership Defendants.
- Reviewed employee personnel files.
- Coordinated the return of personal belongings to employees.
- Prepared and issued the Receiver Maria M. Yip's First Interim Report on June 13, 2022 (ECF 50).
- Attended the status conference and preliminary injunction hearings.

The above activities are discussed in more detail in the Receiver's First Interim Report which was filed on May 13, 2022 (Doc. 50) (the "Interim Report"). The Interim Report contains comprehensive and detailed information regarding the case background and status; the recovery of assets; immediate access to the office of the Receivership Entities; financial information about Receivership Entities. The Interim Report addresses all activity that resulted in the fees and costs sought in this motion and is incorporated herein.

Case Background

As of the date of filing this Application, the Court has appointed Maria M. Yip as Receiver over the assets of the following entities:

- a) Prosperity Training Technology LLC;
- b) Elite Customer Services, LLC;
- c) Digital Business Scaling LLC;
- d) First Coast Matchmakers Inc.;
- e) First Coast Matchmakers LLC;
- f) Financial Consulting Management Group LLC; and
- g) Resource Management Investments, LLC.

See Doc. 50. The foregoing entities are collectively referred to as the "Receivership Entities." On May 2, 2022, the Federal Trade Commission ("FTC") filed a complaint (Doc. 1) against the individual and corporate Defendants charging them with violations of various federal statutes under the purview of the Federal Trade Commission. These allegations relate to credit repair services and business opportunities promoted by the Defendants. Fill in more information re allegations

Professional Services Rendered and Costs Incurred

The TRO authorizes the Receiver to "[c]hoose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order" and states that the "Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them" subject to approval by the Court. *See* Doc. 12 ¶¶ XIV.F. and XX.

Pursuant to the Court's TRO, the Receiver retained (1) Johnson Cassidy Newlon & DeCort ("JCND") to provide legal services; (2) Yip Associates ("Yip") to provide forensic accounting services; and (3) E-Hounds, Inc. ("E-Hounds") to provide computer forensic services. All of the foregoing are collectively referred to as "the Professionals."

As described above and more fully in the Interim Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and recover additional assets, and understand the operations of the Receivership Entities. The services provided by the Receiver and her professionals are for the benefit of potentially aggrieved consumers, creditors, and other interested parties.

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

The Receiver requests the Court award her fees for the professional services rendered and costs incurred from May 2, 2022 through July 1, 2022,

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in the amount of \$35,337.40 and \$7,578.45, respectively. Additionally, the Receiver advanced Operation Costs for the Receivership Entities in the amount of \$20,819.33. The standard hourly rate the Receiver charges clients is \$560. However, the Receiver agreed, for purposes of her appointment as the Receiver, that her hourly rate would be reduced to \$325, representing a forty-two percent discount off the standard hourly rate which she charges clients in complex matters. This rate was set forth in the Receiver's submission to the FTC. *See* Doc. 8, Ex. 1.

The Receiver commenced services immediately upon her appointment. The Receiver has billed her time for these activities in accordance with the proposal she provided to the FTC which was subsequently provided to the Court.

For the time covered by this motion, the work of the Receiver, JCND, and E-Hounds focused on investigating and locating assets for the benefit of the Receivership, analyzing operations for the Receivership Entities, and communicating with customers and former/current employees. These activities of the Receiver are set forth in detail in the Interim Report. (Doc. 50). A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as <u>Exhibit 1</u>. The Receiver's time and fees for services rendered for activity from May 2, 2022 through July 1, 2022, are

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98.18 hours at \$325/hour and 19.8 hours at \$163/hour for travel time for a total of \$35,337.40.

In addition to her professional fees, the Receiver had costs of \$7,578.45 as summarized below:

Costs	Total
Travel	\$2,141.52
Out of Town Travel	\$728.07
Overnight Delivery	\$414.86
Website	\$4,294.00
Total	\$7,578.45

In addition to these out of pocket costs, the Receiver had advanced certain Operational Costs for the Receivership Entities. These Operational Costs are specifically listed on <u>Exhibit 2</u> and total \$20,819.33.

II. Johnson Cassidy Newlon & DeCort.

The Receiver requests the Court award JCND fees for professional services rendered and costs incurred from May 2, 2022 through July 1, 2022, in the amounts of \$55,666.50 and \$6,533.92, respectively. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, JCND's attorneys and paralegals have agreed to follow the blended rates quoted in the Receiver's submission to the FTC. Doc. 8, Exhibit 1. JCND began providing services at the time of the Receiver's appointment. The activities of JCND for the time covered by this Application are set forth in the Interim Report. *See* Doc. 50. A copy of the statement summarizing the services rendered and costs incurred by JCND from May 2, 2022 through July 1, 2022, is attached as <u>Exhibit 3</u>. JCND's time and fees for services rendered on this matter for each professional are as follows:

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Katherine Donlon					
(KCD)	Partner	27	141.7	\$360.00	$$47,898.00^{2}$
Brad Kinni (BK)	Associate	2	27.1	\$235.00	\$6,38.50
Mary Gura (MG)	Paralegal		7.5	\$175.00	\$1,312.50
Charmayne Rolon					
(CR)	Paralegal		0.5	\$175.00	\$87.50
Fees					\$55,666.50
Disbursements					\$6,533.92
Total					\$62,200.42

JCND's Time and Fees for Services Rendered

In addition to legal fees, JCND has advanced costs of \$6,533.92 as summarized below.

Costs	Total
Travel Expenses	\$1,641.44
Depositions	\$2,947.03
Delivery Services	\$1,181.63
Filing Fees	\$441.00
Copies for	\$322.85
Section754	
Filings	
Total	\$6,533.92

 $^{^{2}}$ This includes a discount of \$3,150 for 50% reduction for travel time.

III. <u>Yip Associates.</u>

The Receiver requests the Court award Yip fees for professional services rendered and costs incurred from May 2, 2022 through July 1, 2022, in the amount of \$151,953.40 and \$6,547.35, respectively. Yip is a forensic accounting firm that specializes in insolvency and restructuring, Ponzi schemes, fraud investigations, insolvency taxation, business valuation, and litigation support. The firm is a leading boutique forensic accounting firm serving clients throughout the United States and abroad. The Receiver, Maria Yip, founded the firm in 2008. The professionals at Yip have been instrumental to the Receiver in investigating and analyzing the financial status of the Receivership Entities and the operations of the Receivership Entities. Additionally, Yip provides invaluable resources on the tracing of business proceeds to various assets and accounts. Pursuant to Yip's proposal to the FTC, Lead Forensic Accountants (Cristal Brun, Shawna Amarmani, Danny Zamorano) normally charge \$350/hour but are charging \$295/hour, a 16% discount. Similarly, Senior Forensic Accountants (Susan Tai, Charles Bailey, Gabriella Martel, Christopher Vatti, Christopher Leo) charge \$245/hour but are being billed at \$225/hour for this engagement. Travel time was billed at 50% discount. Also, time spent communicating with consumers was billed at \$75/hour.

Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite <u>Exhibit 4</u>. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

		Yrs			
Professional	Position	Exp.	Hours	Rate	Total
	Lead	20			
	Forensic				
Cristal A. Brun (CB)	Accountant		77.0	\$295.00	\$22,715.00
	Lead	20			
	Forensic				
Cristal A. Brun (CB)	Accountant		6.5	\$75.00	\$487.50
	Lead	11			
Shawna Amarani	Forensic				
(SBA)	Accountant		92.4	\$295.00	\$27,258.00
	Lead	11			
Shawna Amarani	Forensic				
(SBA)	Accountant		9.2	\$148.00	\$1,361.60
	Lead	11			
Shawna Amarani	Forensic				
(SBA)	Accountant		1.1	\$75.00	\$82.50
	Lead	6			
Danny Zamorano	Forensic				
(DDZ)	Accountant		53.4	\$295.00	\$15,753.00
	Senior	8			
	Forensic				
Susan Y. Tai (SYT)	Accountant		135.9	\$225.00	\$30,577.50
	Senior	8			
	Forensic				
Susan Y. Tai (SYT)	Accountant		12.1	\$113.00	\$1,367.30
	Senior	6			
Charles D. Bailey	Forensic				
(CDB)	Accountant		110.4	\$225.00	\$24,840.00
Charles D. Bailey	Senior	6			
(CDB)	Forensic		17.7	\$113.00	\$2,000.10

Yip Associates Time and Fees for Services Rendered

	Accountant				
	Senior	5			
Gabriella M. Martell	Forensic				
(GMM)	Accountant		33.7	\$225.00	\$7,582.50
	Senior	5			
Gabriella M. Martell	Forensic				
(GMM)	Accountant		17.0	\$75.00	\$1,275.00
	Senior	6			
Christopher M. Vatti	Forensic				
(CMV)	Accountant		62.2	\$225.00	\$13,995.00
	Senior	6			
Christopher M. Vatti	Forensic				
(CMV)	Accountant		6.8	\$113.0	\$768.40
	Senior	8			
Christopher F. Leo	Forensic				
(CFL)	Accountant		8.4	\$225.00	\$1,890.00
Fees					\$151,953.40
Disbursements					\$6,547.35
Total					\$158,500.75

In addition to professional fees, Yip had costs of \$6,547.35 as summarized below:

Costs	Total
Travel	\$6,212.86
Copies	\$315.15
Lock for Storage	\$19.34
Unit	
Total	\$6,547.35

IV. <u>E-Hounds, Inc.</u>

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from May 2, 2022 through July 1, 2022, in the amount of \$29,642. E-Hounds is a computer forensics firm that assists the Receiver in securing and analyzing electronic data. E-Hounds has been instrumental in collecting and preserving all electronic records, including email records, GoDaddy records, social media sites, and YouTube videos promoted by the Receivership Entities. Although E-Hounds was not involved in the Immediate Access on May 4, 2022, their assistance has been invaluable to the Receiver. Additionally, E-Hounds has uploaded much of the information obtained by the Receiver to E-Hounds' proprietary review platform, which the Receiver's team is actively using. Copies of the statements summarizing the services rendered for the pertinent period are attached as composite <u>Exhibit 5</u>. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

Professional	Position	Hours	Rate	Total
Robert Rohr (RTR)	Senior Analyst	36.60	\$350.00	\$12,810.00
	Project			
Robert Rohr (RTR)	Management	1.00	\$195.00	\$195.00
James Schooler				
(JCS)	Technician	13.00	\$250.00	\$3,250.00
James Schooler	Project			
(JCS)	Management	6.80	\$195.00	\$1,326.00
James Schooler	Triage Laptop –			
(JCS)	Flat Fee	2.00	\$1,250.00	\$2,500.00
Ernesto Rojas				
(ERC)	Technician	20.00	\$250.00	\$5,000.00
Ernesto Rojas	Project			
(ERC)	Management	4.80	\$195.00	\$936.00
	Project			
Dave Bukas (DAB)	Management	3.00	\$195.00	\$585.00
Fees				\$26,602.00

E-Hounds' Time and Fees for Services Rendered

Platform Charges		\$3,040.00
Disbursements		\$29,642.00

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

MEMORANDUM OF LAW

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

trial court. See Monaghan v. Hill, 140 F.2d 31, 34 (9th Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and his Professionals, the Court should consider the circumstances surrounding the Receivership. See Elliot, 953 F.2d at 1577.

In determining the reasonableness of fees, the Court must calculate the lodestar, which is the "number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate." Hensley v. Eckerhart, 461 U.S. 424, 433 (1983). This is in part based on the nature and extent of the services rendered and the value of those services. See Grant v. George Schumann Tire & Battery Co., 908 F.2d 874, 877-78 (11th Cir. 1990) (bankruptcy fee award case addressing the issue of attorney's fees generally before considering specific requirements in the bankruptcy context). Additionally, the Court should consider the twelve factors set forth in Johnson v. Georgia Highway Express, Inc., 488 F.2d 714 (5th Cir. 1974), a case involving an award of attorneys' fees under federal civil rights statutes, as incorporated by the Eleventh Circuit in *Grant*, a bankruptcy case, are as follows: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill required to perform the legal services properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee for similar work in the community; (6) whether the fee is fixed contingent; (7) time limitations imposed by the client or by the or

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

A receiver and the team he or she assembles are entitled to reasonable compensation and courts have looked at several factors in determining reasonableness: (1) the results achieved by the receiver; (2) the ability, reputation and other professional qualities of the receiver; (3) the size of the estate and its ability to afford the expenses and fees; and (4) the time required to conclude the receivership. *SEC v. W.L. Moody* & Co, 374 F. Supp. 465, 480-484 (S.D. Tex. 1974). In this case, the Receiver has taken control over the Receivership Entities' office and operations, working with Defendants and their counsel to unravel the entities and accounts used by the Defendants to operate the activity at issue. Certainly the initial bill from any receiver will be significant as the Receiver and her team, through the Immediate Access, work diligently to gain control over the assets of the Receivership Entities and begin digesting corporate information and data. Finally, the Receiver has sought to keep Credit Game customers up to date regarding the Receiver's progress as well as the status of the Court case through the Receivership website, which allowed investors to register for information related to this matter. The Receiver and her team have been fielding hundreds of calls from consumers regarding their experiences with the Credit Game or with questions regarding the status of the Receivership Entities.

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

As discussed above, the Receiver and JCND have discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the Receiver and the Professionals are at or below those charged by similar professionals in the Middle District of Florida. This case has been time-intensive for the Receiver and her Professionals because of the need to resolve many issues rapidly and efficiently. The attached Exhibits detail the time, nature, and extent of the professional services rendered by the Receiver and her Professionals for the benefit of consumers, creditors, and other interested parties.

Although the SEC investigated and filed the initial pleadings in this case, as directed by the Order Appointing Receiver (*see, e.g.,* Doc. 11 ¶¶ 2, 4), the Receiver is involved with the investigation and forensic analysis of the events leading to the commencement of the pending action, the efforts to locate and gather investors' money, the determination of investor and other creditor claims, and any ultimate payment of these claims. While the Receiver is sensitive to the need to conserve the Receivership Entities' assets, she believes the fees and costs expended to date were reasonable, necessary, and benefited the Receivership.

Notably, the FTC has no objection to the relief sought in this motion. S.E.C. v. Byers, 590 F. Supp. 2d 637 (S.D.N.Y. 2008) (quoting S.E.C. v. Fifth Ave. Coach Lines, Inc., 364 F.Supp. 1220, 1222 (S.D.N.Y.1973) ("[I]n a securities receivership, '[o]pposition or acquiescence by the SEC to the fee application will be given great weight."). Although the cited case relates to an SEC action, a similar argument would be made as it relates to the regulator at issue in this case, the FTC.

CONCLUSION

Under the TRO, the Receiver, among other things, is authorized and empowered to engage professionals to assist her in carrying out her duties

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and obligations. The TRO further provides that she apply to the Court for authority to pay herself and her Professionals for services rendered and costs incurred. In exercising her duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interests of the Receivership.

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

Maria M. Yip, Receiver	63,735.18
Johnson, Cassidy, Newlon & DeCort	62,200.42
Yip Associates	\$158,500.75
E-Hounds, Inc.	\$29,642.00

LOCAL RULE 3.01(g) CERTIFICATION

Undersigned counsel for the Receiver has conferred with counsel for the FTC and Defendants. Plaintiff FTC has no objection to the relief sought. Defendants are continuing to review the Receiver's motion. Undersigned counsel will update this certification by July 11, 2022 regarding Defendants' position.

<u>RECEIVER'S CERTIFICATION</u>

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

To the best of the Receiver's knowledge, information, and belief formed after reasonable inquiry, the Application and all fees and expenses herein are true and accurate.

All fees contained in the Application are based on the rates submitted by the Receiver to the FTC and provided to the Court. Doc. 8. Such fees are reasonable, necessary, and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Application were incurred in the best interests of the Receivership Estate.

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With the exception of the Court-approved engagements described above, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

> <u>s/Maria M. Yip</u> Maria M. Yip, as Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 8, 2022, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court through the CM/ECF system, which served counsel of record.

> <u>/s/ Katherine C. Donlon</u> Katherine C. Donlon, FBN 0066941 <u>kdonlon@jclaw.com</u> JOHNSON, CASSIDY, NEWLON & DECORT P.A. 2802 N. Howard Avenue Tampa, FL 33607 Tel: (813) 291-3300 Fax: (813) 324-4629 Attorneys for Receiver Maria M. Yip

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EXHIBIT 1



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE DETAIL MARIA M. YIP, RECEIVER

Maria M. Yip, Receiver	Invoice Number:	31243
2 South Biscayne Boulevard	Date:	07/08/2022
Suite 2690		
Miami, Florida 33131		

Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/02/22	MMY	Travel to Jacksonville for filing of FTC action. [Billed at 50% of the discounted hourly billing rate.]	5.0	\$163	\$ 815.00
05/04/22	MMY	Preparation for Immediate Access including detailed review of Court's TRO, discussions with K. Donlon re: third-party letters based on available information; preparation of documentation for Immediate Access; discussion with forensic accountants re: Immediate Access; discussions with FTC re: law enforcement and meeting with law enforcement re: Immediate Access at two locations; Immediate access, including discussions with Mr. and Mrs. Rando and employees on-site; reivew of the corporate defendants' books and records and available electronic information.	12.0	\$325	\$ 3,900.00
05/05/22	MMY	Continued on-site review of electronic and paper documents; visit to off-site locations of P.O. boxes and storage facility; communications with third- parties regarding TRO.	12.0	\$325	\$ 3,900.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/06/22	ММҮ	Continued on-site review of electronic and paper documents; telephone conversations with K. Donlon and former employees.	9.0	\$325	\$ 2,925.00
05/06/22	MMY	Travel from Jacksonville to Miami. [Billed at 50% of the discounted hourly billing rate.]	5.0	\$163	\$ 815.00
05/08/22	ММҮ	Telephone conversation with K. Donlon re: open items (.2); review of documents obtained from corporate offices (3.5).	3.7	\$325	\$ 1,202.50
05/09/22	MMY	Email communications and telephone calls with K. Donlon re: depositions of individual defendants and bitlocker issues (.3); telephone conversation with K. Donlon re: calls from customers (.2); telephone conversation with K. Donlon re: open items including information on accounts at Fifth Third (.5); discussion with S. Tai, C.Bailey and C.Vatti re: workplan/next steps (1.2); communications with R. Rohr re: access and logins (.3).	2.5	\$325	\$ 812.50
05/10/22	ММҮ	Telephone conversation with customer re: call from the Credit Game (.1); telephone conversation with K. Donlon re: status of various issues including access block by Bitlocker and payroll taxes (.5); Telephone conversation with S. Tai re: customer call (.2); discussion with forensic team for status of case and documents reviewed (.9).	1.7	\$325	\$ 552.50
05/11/22	MMY	Conference call with K. Donlon, J. Quintana and S. Chaudhry re: authorize.net account.	0.5	\$325	\$ 162.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/12/22	MMY	Telephone conversation with K. Donlon re: open items including KEAP(.5); preparation for and attendance at status conference (1.2), discussion with S. Amarnani re: Authorize.net (.2); communications with R. Rohr re: access to YouTube videos (.2); review of analyses of authorize.net information and discussion with S. Amarnani re: same (.5).	2.6	\$325	\$ 845.00
05/13/22	MMY	Telephone conversation with K. Donlon and R. During re: revisions to website (.3); communications with K. Donlon re: KEAP (.1); conference call with K. Donlon and S. Tai re: logins (.2); telephone conversation with K. Donlon re: authorize.net (.1); communications with K. Donlon and R. Rohr re: logins and website (.2).	0.9	\$325	\$ 292.50
05/16/22	MMY	Communications with K. Donlon and R. During re: items for website (.2); telephone conversation with K. Donlon re: living expenses (.2); telephone conversation with L. Parham re: lease on Atlantic Boulevard property (.3); communications with K. Donlon re: GoDaddy admin account and others requiring dual authentication (.2); conference call with K. Donlon and B. Welke re: various issues (.7).	1.6	\$325	\$ 520.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/17/22	MMY	Communications with R. During re: website and content (.5); discussion with forensic accounting team re: status of analysis and documents reviewed (1.0); telephone conversation and email communications with R. Rohr re: access to logins and passwords (.3).	1.8	\$325	\$ 585.00
05/18/22	ММҮ	Telephone conversation with K. Donlon and R. During re: receivership website (.2); telephone conversation with K. Donlon re: request for monthly living expenses for individual defendants (.2); conference call with B. Welke and R. Rohr re: YouTube, Ring Central and other files (.7).	1.1	\$325	\$ 357.50
05/19/22	ММҮ	Conference call with K. Donlon and R. Rohr re: logins and passwords (.9); conference call with K. Donlon and B. Welke re: request to continue operating (.3).	1.2	\$325	\$ 390.00
05/20/2022	ММҮ	Review of draft motion for order requiring compliance with TRO and discussion with K. Donlon re: same (.5); communications with R. Rohr re: various email accounts (.2); communications with K. Donlon re: language for website (.2); conference call with RingCentral (.3).	1.2	\$325	\$ 390.00
05/21/22	MMY	Communications with K. Donlon re: deposition of D. Rando (.3); communications with K. Donlon re: consumer emails and employee laptops (.2).	0.5	\$325	\$ 162.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/22/22	MMY	Telephone conversation with K. Donlon re: retrieving computers (.6); telephone conversation with customer re: another company and communications with K. Donlon re: same (.3).	0.9	\$325	\$ 292.50
05/23/2022	MMY	Meeting with M. Freed , L.T. Lafferty, and K. Donlon re: living expenses for Michael and Valerie Rando and continuing business (.9); communications with K. Donlon re: living expenses requested and other open items (.6).	1.5	\$325	\$ 487.50
05/24/22	MMY	Discussion with S. Amarnani re: status of open items (.5); discussion with S. Tai re: pending IT matters (.5); attendance at the deposition of Michael Rando (3.0); attendance at a portion of the deposition of Valerie Rando (1.5); and discussion with K. Donlon re: living expenses and proposed line of business (.5).	6.0	\$325	\$ 1,950.00
05/25/22	MMY	Communications with S. Amarnani and with K. Donlon re: business expenses (.6); communications with K. Donlon re: consumer emails (.2); communications with K. Donlon re: chargebacks (.6).	1.4	\$325	\$ 455.00
05/26/22	MMY	Communications with K. Donlon re: Inner Circle.	0.2	\$325	\$ 65.00
06/01/22	MMY	Communications with K. Donlon re: business expenses.	0.2	\$325	\$ 65.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/09/22	MMY	Telephone conversation with customer (.2); discussion with C. Brun re: segments of report (1.4); preparation of Receiver's First Interim Report (.6).	2.2	\$325	\$ 715.00
06/10/22	MMY	Continued preparation of Receiver's First Report.	3.7	\$325	\$ 1,202.50
06/11/22	MMY	Continued preparation of Receiver's First Report.	2.0	\$325	\$ 650.00
06/12/22	MMY	Continued preparation of Receiver's First Report.	11.0	\$325	\$ 3,575.00
06/13/22	MMY	Continued preparation of Receiver's First Report.	7.8	\$325	\$ 2,535.00
06/14/22	MMY	Telephone conversation with K. Donlon re: fees for Defendants' counsel and handling of inbound calls (.4); review of messages from customers (.5).	0.9	\$325	\$ 292.50
06/15/22	MMY	Review of response to motion to compel compliance and discussion with K. Donlon re: same.	0.5	\$325	\$ 162.50
06/16/22	MMY	Discussion with C. Brun re: work to be completed (.9); preparation for preliminary injunction hearing (1.2).	2.1	\$325	\$ 682.50
06/17/22	MMY	Telephone conversation with former employee (1.2); preparation for hearing with K. Donlon (.9); and attendance and participation at hearing on preliminary injunction (1.5); discussion with K. Donlon re: outcome of hearing (.8).	4.4	\$325	\$ 1,430.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/17/22	MMY	Travel to/from Jacksonville for hearing on preliminary injunction. [Billed at 50% of the discounted hourly billing rate.]	9.8	\$163	\$ 1,597.40
06/22/22	MMY	Telephone conversation with current employee re: willingness to assist.	0.3	\$325	\$ 97.50
06/30/22	MMY	Telephone conversation with K. Donlon re: Court's order on fees and expenditures; settlement conference and next steps.	0.8	\$325	\$ 260.00
07/01/22	MMY	Conference call with K. Donlon and B. Welke re: open items.	0.6	\$325	\$ 195.00
		Total Fees	118.6		\$ 35,337.40



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
		Expenses			
05/05/22	MMY	Reimbursement for locksmith : Knowell's Lock & Safe.			\$ 345.08
05/06/22	MMY	Roundtrip Mileage reimbursement - Travel to/from Miami to Jacksonville. (700 miles x .585 = \$409.50)			\$ 409.50
05/06/22	MMY	Lodging - Hyatt Regency (05/02/22 - 05/06/22)			\$ 1,082.52
05/06/22	MMY	Per diem food allowance for (05/02/22 - 05/06/22)			\$ 236.00
05/11/22	MMY	Reimbursement for locksmith : Knowell's Lock & Safe.			\$ 240.00
05/12/22	MMY	Reimbursement for locksmith : Lock Buster's Inc.			\$ 142.99
05/14/22	MMY	FEDEX			\$ 75.75
05/14/22	MMY	FEDEX			\$ 273.06
05/27/22	MMY	K.Tek Systems (Website services)			\$ 303.00
05/27/22	MMY	K.Tek Systems (Website services)			\$ 3,600.00
06/01/22	MMY	K.Tek Systems (Website services)			\$ 83.00
06/16/22	MMY	FEDEX			\$ 66.05
06/17/22	MMY	Mileage reimbursement - Travel to/from Jacksonville to attend preliminary injunction hearing. (700 miles x $.585 = 409.50)			\$ 409.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
06/17/22	MMY	Parking reimbursement - City of Jacksonville.			\$ 4.00
07/01/22	MMY	K.Tek Systems (Website services)			\$ 83.00
07/01/22	MMY	K.Tek Systems (Website services)			\$ 225.00
		Total Expenses		-	\$ 7,578.45
				_	
		Total Amount Due		_	\$ 42,915.85

Case 3:22-cv-00487-TJC-MCR Document 67-2 Filed 07/08/22 Page 1 of 3 PageID 1221

EXHIBIT 2



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE DETAIL MARIA M. YIP, RECEIVER

Maria M. Yip, Receiver	Invoice Number:	31244
2 South Biscayne Boulevard	Date:	07/08/2022
Suite 2690	Matter ID:	172.0003
Miami, Florida 33131		

Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Request for Reimbursement of Out-of-Pocket Costs Incurred by Receiver for Business Expenses of the Corporate Defendants.

May 1, 2022 through July 1, 2022

Date	Description	 Amount
05/19/22	SiteGround Hosting	\$ 155.99
05/26/22	Postage Fee: Mail Received from The UPS Store #1469	\$ 17.45
05/27/22	The UPS Store	\$ 58.55
06/07/22	American Express x11005 - Payments - Stmt Closing 05/19/22	\$ 35.00
06/07/22	American Express x71002 - Payments - Stmt Closing 05/09/22	\$ 8,695.00
06/09/22	The UPS Store	\$ 18.39
06/09/22	SafeTouch, Inc.	\$ 92.78
06/10/22	Automobile expense - VA Leasing Corporation x2100-168 Stmt 06/07/22	\$ 4,816.30
06/13/22	The UPS Store	\$ 16.21
06/13/22	CallRail.com	\$ 251.32



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Request for Reimbursement of Out-of-Pocket Costs Incurred by Receiver for Business Expenses of the Corporate Defendants.

May 1, 2022 through July 1, 2022

Date	Description	 Amount
06/14/22	SiteGround Hosting	\$ 29.99
06/15/22	SafeTouch, Inc.	\$ 87.78
06/20/22	Automobile expense - VA Leasing Corporation x2100-168 Stmt 06/07/22	\$ 4,567.83
06/24/22	The UPS Store	\$ 12.16
06/27/22	Intuit QuickBooks	\$ 80.00
06/29/22	CallRail.com	\$ 212.50
07/01/22	JEA Fees	\$ 9.95
07/01/22	The UPS Store	\$ 17.67
07/01/22	The UPS Store	\$ 255.85
07/01/22	JEA	\$ 1,388.61
	Total Amount Due	\$ 20,819.33

Case 3:22-cv-00487-TJC-MCR Document 67-3 Filed 07/08/22 Page 1 of 13 PageID 1224

EXHIBIT 3




Invoice # 5988 Date: 07/07/2022

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

2802 N. Howard Ave Tampa, FL 33607

Maria Yip 2 S. Biscayne Blvd. Suite 2960 Miami, FL 33131

Yip-00001-FTC v. Michael Rando, et al.

FTC v. Michael Rando, et al.

Services

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	05/02/2022	Travel to Jacksonville for filing of FTC action. [Discounted 50%]	KD	3.50	\$360.00	\$630.00
Service	05/03/2022	Research and pull Accurint reports on M. Rando and V. Rando (.3).	MG	0.30	\$175.00	\$52.50
Service	05/03/2022	Review Accurint reports for Defendants (.5); review Court's TRO (.4).	KD	0.90	\$360.00	\$324.00
Service	05/04/2022	Research and pull an additional Accurint report on V. Rando (.2).	MG	0.20	\$175.00	\$35.00
Service	05/04/2022	Prepare for and attend Immediate Access (10.0); review TRO regarding third-party letters (.5); confer with Receiver regarding same (.4); begin drafting third-party letters (1.1); email TRO to potential counsel for Defendants (.2).	KD	12.20	\$360.00	\$4,392.00
Service	05/05/2022	Continued review of office documents and emails to third-parties (10.1); emails with employees and Randos (.6); meet with Truist representatives (.3).	KD	11.00	\$360.00	\$3,960.00
Service	05/06/2022	Research and pull the Accurint report for J. Koerner (.1).	MG	0.10	\$175.00	\$17.50
Service	05/06/2022	Continued review of office records and emails; communications with third-parties	KD	9.00	\$360.00	\$3,240.00

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		regarding preservation and production of records; emails with employees; emails with counsel for Randos; interviews with former employees of Credit Game University; draft and serve Notice of Deposition for depositions of Michael and Valerie Rando.				
Service	05/06/2022	Travel from Jacksonville to Tampa. [Discounted 50%]	KD	3.50	\$360.00	\$630.00
Service	05/07/2022	Review YouTube comments (.2); email to L. Lafferty regarding same (.1)	KD	0.30	\$360.00	\$108.00
Service	05/08/2022	Emails with B. Welke and L. Lafferty regarding outstanding issues and scheduling call (.3); confer with Receiver regarding same (.2).	KD	0.50	\$360.00	\$180.00
Service	05/09/2022	Conference call with L.Lafferty, B. Welke and M. Freed (.8); telephone calls and emails with B. Welke regarding issues related to upcoming depositions and hearing (.5); emails with N. Hill regarding information from Randos (.4); emails and telephone calls with Receiver regarding same (.4); confer with Receiver regarding customer calls (.2); email to Truist (.1); emails with M. Freed and N. Hill regarding M. Rando computer and passwords (.4); emails with Receiver and S. Tai regarding same (.2); confer with B. Welke (.3); emails with N. Hill regarding bank accounts and other financial information (.5); receipt and revuew of fax from Fifth Third regarding Rando accounts (.3); emails with L. Lafferty regarding converting hearing to status conference and deposition schedule (.3); confer with Receiver regarding outstanding issues (.5); review and revise motion to set status conference (.2); call with B. Welke and L. Lafferty regarding same (.3); review Receiver report in separate FTC case (.2).	KD	5.60	\$360.00	\$2,016.00
Service	05/10/2022	Emails with Fifth Third (.1); emails with B. Welke and N. Hill regarding imaging telephones and bitlocker recovery key for M. Rando's computer (.3); emails with counsel regarding depositions (.1); emails with Paycor and Receiver regarding payment (.3); review Court's Order setting status conference (.2); cancel depositions in light of Court's Order (.1); emails with J. Quintana, Visa (.1); work on 754 letters (.5).	KD	1.80	\$360.00	\$648.00
Service	05/11/2022	Conference call with B. Welke, S. Chaudhry and N. Hill regarding status update (.4);	KD	3.00	\$360.00	\$1,080.00

(.9); conference call with Authorize.net, M. Yip and	J. Quintana, I S. Chaudhry (.5);				
		MG	3.70	\$175.00	\$647.50
counsel (.8); confer with F outstanding issues (.5); d letters to Navy Federal C Webull and Vystar (.6); co Denefits (.2); review office check provided by landlor Birtolo (.2); communicate	Receiver regarding raft preservation redit Union, TSYS, ommunicate with e lease and rent rd (.2); email to B. with Ash	KD	3.10	\$360.00	\$1,116.00
		MG	0.40	\$175.00	\$70.00
review court emails from of Florida, District of Minn districts regarding miscell (.3); review and revise inf Receivership website (.5) Receiver and R. During re (.3); communicate with K. and Receiver, regarding e account (.1); communicat regarding D. Rando (.2); N. Hill regarding Defenda the TRO, contact informa and logins for other email communicate with S. Tai regarding login issues (.2 Receiver regarding Author (.1); emails with I. Freckle eve.co information (.1); em	Southern District hesota and other laneous actions formation for y; confer with egarding same . Bonfiglio, Keap, efforts to cancel te with B. Welke communicate with ints sending out tion for D. Rando, l accounts (.5); and Receiver y; confer with prize.net database eton regarding mails with R. Rohr	KD	2.70	\$360.00	\$972.00
		KD	0.20	\$360.00	\$72.00
website (.3); communicat and R. During at K-Tek re (.2); emails with N. Hill re authentication (.1); receip Defendants' request for li (.2); confer with Receiver same (.2); conference cal Chaudry, A. Rattner and	e with Receiver egarding same garding dual ot and review ving expenses regarding the Il with B. Welke, S. Receiver (1.3);	KD	3.70	\$360.00	\$1,332.00
	 (.9); conference call with Authorize.net, M. Yip and work on section 754 filing 2022 Communicate with bankin regarding temporary restration counsel (.8); confer with I outstanding issues (.5); d letters to Navy Federal C Webull and Vystar (.6); cd Denefits (.2); review officient check provided by landloo Birtolo (.2); communicate Properties (.1); telephonin Status Conference (.5). 2022 Communicate with Navy Union regarding the TRO 2022 Review Court's Schedulir review court emails from of Florida, District of Minr districts regarding miscell (.3); review and revise inf Receiver ship website (.5) Receiver and R. During regarding D. Rando (.2); N. Hill regarding Defendat the TRO, contact informa and logins for other email communicate with S. Tai regarding login issues (.2) Receiver regarding Author (.1); emails with I. Freckle eve.co information (.1); e and Receiver regarding the TRO, (.2); emails with B. Welke and regarding Rando login creating Ran	 regarding temporary restraining order (3.7). 2022 Conference call with Rando and FTC counsel (.8); confer with Receiver regarding outstanding issues (.5); draft preservation letters to Navy Federal Credit Union, TSYS, Webull and Vystar (.6); communicate with Denefits (.2); review office lease and rent check provided by landlord (.2); email to B. Birtolo (.2); communicate with Ash Properties (.1); telephonically attend Court's Status Conference (.5). 2022 Communicate with Navy Federal Credit Union regarding the TRO (.4). 2022 Review Court's Scheduling Order (.2); review court emails from Southern District of Florida, District of Minnesota and other districts regarding miscellaneous actions (.3); review and revise information for Receivership website (.5); confer with Receiver and R. During regarding same (.3); communicate with K. Bonfiglio, Keap, and Receiver, regarding efforts to cancel account (.1); communicate with B. Welke regarding D. Rando (.2); communicate with N. Hill regarding Defendants sending out the TRO, contact information for D. Rando, and logins for other email accounts (.5); communicate with S. Tai and Receiver regarding Authorize. net database (.1); emails with I. Freckleton regarding eve.co information (.1); emails with R. Rohr and Receiver regarding logins and website (.2). 2022 Emails with B. Welke and Receiver regarding Rando login credentials. 	 (.9); conference call with J. Quintana, Authorize.net, M. Yip and S. Chaudhry (.5); work on section 754 filings (1.2). 2022 Communicate with banking entities regarding temporary restraining order (3.7). 2022 Conference call with Rando and FTC counsel (.8); confer with Receiver regarding outstanding issues (.5); draft preservation letters to Navy Federal Credit Union, TSYS, Webull and Vystar (.6); communicate with Denefits (.2); review office lease and rent check provided by landlord (.2); email to B. Birtolo (.2); communicate with Ash Properties (.1); telephonically attend Court's Status Conference (.5). 2022 Communicate with Navy Federal Credit Union regarding the TRO (.4). 2022 Review Court's Scheduling Order (.2); review court emails from Southern District of Florida, District of Minnesota and other districts regarding miscellaneous actions (.3); review and revise information for Receivership website (.5); confer with Receiver and R. During regarding same (.3); communicate with K. Bonfiglio, Keap, and Receiver, regarding efforts to cancel account (.1); communicate with B. Welke regarding D. Rando (.2); communicate with N. Hill regarding Defendants sending out the TRO, contact information for D. Rando, and logins for other email accounts (.5); communicate with S. Tai and Receiver regarding login issues (.2); confer with Receiver regarding Authorize.net database (.1); emails with L Freckleton regarding eve.co information (.1); emails with R. Rohr and Receiver regarding logins and website (.2). 2022 Enails with B. Welke and Receiver regarding Rando login credentials. 2022 Review pleadings to post to Receivership website (.3); communicate with Receiver and R. During at K-Tek regarding same (.2); emails with N. Hill regarding dual autherthication (.1); receipt and review Defendants' request for living expenses (.2); confer with Receiver regarding the same (.2); confer with Receiver regarding the same (.2); confer with Recei	(.9): conference call with J. Quintana, Authorize.net, M. Yip and S. Chaudhry (.5); work on section 754 filings (1.2).2022Communicate with banking entities regarding temporary restraining order (3.7).MG3.702022Conference call with Rando and FTC counsel (.8); confer with Receiver regarding outstanding issues (.5); draft preservation letters to Navy Federal Credit Union, TSYS, Webull and Vystar (.6); communicate with Denefits (.2); review office lease and rent check provided by landlord (.2); email to B. Birtolo (.2); communicate with Ash Properties (.1); telephonically attend Court's Status Conference (.5).MG0.402022Communicate with Navy Federal Credit Union regarding the TRO (.4).MG0.402022Review Court's Scheduling Order (.2); review and revise information for Receivership website (.5); confer with Receiver regarding efforts to cancel account (.1); communicate with K. Bonfigio, Keap, and Receiver, regarding efforts to cancel account (.1); communicate with B. Welke regarding Defendants sending out the TRO, contact information for D. Rando, and logins for other email accounts (.5); communicate with S. Tai and Receiver regarding login sal website (.1); comise (.2); confer with Receiver regarding Muthorize.net database (.1); emails with N. Freckleton regarding eve.co information (.1); emails with Receiver regarding login sal website (.2).0.202022Emails with B. Welke and Receiver regarding Rando login credentials.KD3.702022Emails with N. Hill regarding game (.1); emails with Receiver regarding stores (.2); confer with Receiver regarding logins and website (.2).3.70	(9): conference call with J. Quintana, Authorize.net, M. Yip and S. Chaudhry (.5): work on section 754 filings (1.2).2022Communicate with banking entities regarding temporary restraining order (3.7).MG3.70\$175.002022Conference call with Rando and FTC counsel (.8): confer with Receiver regarding outstanding issues (.5): draft preservation letters to Navy Federal Credit Union, TSYS, Webuil and Vystar (.6): communicate with Denefits (.2): review office lease and rent check provided by landlord (.2): email to B. Birtolo (.2): communicate with Ash Properties (.1): telephonically attend Court's Status Conference (.5).MG0.40\$175.002022Communicate with Navy Federal Credit Union regarding the TRO (.4).MG0.40\$175.002022Review Court's Scheduling Order (.2): review ourd rewise information for Receiver and R. During regarding same (.3): communicate with K. Borifiglio, Keap, and Receiver, regarding efforts to cancel account (.1): communicate with B. Welke regarding D. Rando (.2): confer with Receiver and R. During regarding same (.3): confer with Receiver regarding Defendants sending out the TRO, contact information for D. Rando, and logins for other email accounts (.5): communicate with K. Borifiglio, Keap, and Receiver regarding logins and website (.1): emails with I. Freckleton regarding eve. co information (.1): emails with R. Rohr and Receiver regarding logins and website (.2): communicate with Receiver regarding Rando login credentials.KD0.20\$360.002022Erealis with B. Welke and Receiver regarding Rando login credentials.KD0.20\$360.002022Review pleadings to post to Receivers rand

	depositions (.2); research Sunbiz filings (.6); emails with N. Hill and B. Welke regarding Mikesingles@gmail.com address (.2); telephone call with employee TG regarding items in office (.1); communicate with B. Birtolo regarding request for interview (.1); confer with B. Welke regarding mikesingles email issue (.2).				
05/16/2022	Revise the TRO spreadsheet with updated information (.1).	MG	0.10	\$175.00	\$17.50
05/17/2022	Telephone call with consumer SA (.2); draft talking points for website (.5); email to R. Rohr regarding Kajabi mobile application (.1).	KD	0.80	\$360.00	\$288.00
05/17/2022	Continue to research for contact information for Cash App (.2).	MG	0.20	\$175.00	\$35.00
05/19/2022	Research for contact information at Charles Schwab and Goat Payments (.6).	MG	0.60	\$175.00	\$105.00
05/19/2022	Review Randos' personal financial disclosures (.8); draft letters to Charles Schwab at Goat Payments (.6); conference call with N. Hill, M. Freed and M. Rando regarding chargeback information (.3); conference call with R. Rohr and Receiver regarding IT issues (.9); draft Motion to Require Compliance (1.5); telephone calls with S. Chaudhry regarding depositions (.3); emails with D. Bean regarding representation of D. Rando (.1); revise deposition notices (.5); telephone calls with Receiver and B. Welke regarding Defendants' request for meeting to discuss moving forward with business (.3); emails with opposing counsel regarding prior lease for Randos (.2); communicate with employee TG (.2).	KD	6.10	\$360.00	\$2,196.00
05/20/2022	Research for contact information for Retail Ecommerce Ventures (.6).	MG	0.80	\$175.00	\$140.00
05/20/2022	Return telephone call to L. Lafferty (.1); telephone call and emails with C. George, counsel for former landlord (.3); conference call with Ring Central and S. Chadhry regarding preservation and production of records (.7); conference call and follow up emails with Denefits regarding preservation and production of records (.9); revise motion to require compliance with TRO (.8); communicate with Receiver regarding same (.4); draft Declaration in support of	KD	5.60	\$360.00	\$2,016.00
	05/17/2022 05/19/2022 05/19/2022	 (.6); emails with N. Hill and B. Welke regarding Mikesingles@gmail.com address (.2); telephone call with employee TG regarding items in office (.1); communicate with B. Birtolo regarding request for interview (.1); confer with B. Welke regarding mikesingles email issue (.2). 05/16/2022 Revise the TRO spreadsheet with updated information (.1). 05/17/2022 Telephone call with consumer SA (.2); draft talking points for website (.5); email to R. Rohr regarding Kajabi mobile application (.1). 05/19/2022 Continue to research for contact information for Cash App (.2). 05/19/2022 Research for contact information at Charles Schwab and Goat Payments (.6). 05/19/2022 Review Randos' personal financial disclosures (.8); draft letters to Charles Schwab at Goat Payments (.6); conference call with N. Hill, M. Freed and M. Rando regarding Chargeback information (.3); conference call with R. Rohr and Receiver regarding Chargeback information (.3); conference call with R. Rohr and Receiver regarding T issues (.9); draft Motion to Require Compliance (1.5); telephone calls with S. Chaudhry regarding depositions (.3); emails with D. Bean regarding representation of D. Rando (.1); revise deposition notices (.5); telephone calls with Receiver and B. Welke regarding Defendants' request for meeting to discuss moving forward with business (.3); emails with opposing counsel regarding prior lease for Randos (.2); communicate with employee TG (.2). 05/20/2022 Research for contact information for Retail Ecommerce Ventures (.6). 05/20/2022 Research for contact and S. Chadhry regarding preservation and production of records (.7); conference call and thind (.3); conference call with Ring Central and S. Chadhry regarding preservation and production of records (.7); conference call and follow up emails with Denefits regarding preservation and production of records (.9); revise motion to require compliance with TRO (.8); communicate with Receiver	(.6): emails with N. Hill and B. Welke regarding Mikesingles@gmail.com address (.2): telephone call with employee TG regarding riterview (.1): confer with B. Welke regarding mikesingles email issue (.2).05/16/2022Revise the TRO spreadsheet with updated information (.1).MG05/17/2022Telephone call with consumer SA (.2); draft talking points for website (.5); email to R. Rohr regarding Kajabi mobile application (.1).MG05/17/2022Continue to research for contact information for Cash App (.2).MG05/19/2022Research for contact information at Charles Schwab and Goat Payments (.6).MG05/19/2022Review Randos' personal financial disclosures (.8); draft letters to Charles Schwab at Goat Payments (.6).KD05/19/2022Review Randos' personal financial disclosures (.8); draft Notion to Require Compliance (1.5); telephone calls with S. Chaudhry regarding depositions (.3); emails with D. Bean regarding representation of D. Rando (.1); revise deposition notices (.5); telephone calls with Receiver and B. Welke regarding same (.1); emails with C. George regarding prior lease for Randos (.2); communicate with employee TG (.2).MG05/20/2022Research for contact information for Retail ecounsel for former I and I and emails with C. George, counsel for former Handlord (.3); conference call with Ring Central and S. 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Welke regarding Defendants' request for meeting to discuss moving forward with busines (.3); emails with 0.S.60\$175.0005/20/2022Research for contact information or Retail Ecommerce Ventures (.6).MG0.80\$175.0005/20/2022Research for contact information for Retail Ecommerce Ventures (.6).MG0.80\$175.0005/20/2022Research for contact information for Retail Ecommerce Ventures (

		motion (.6); emails with R. Rohr regarding outstanding issues (.3); telephone call with N. Hill regarding motion to require compliance and request for living expenses (.2); draft language for auto response to Credit Game University support email (.3); telephone call with Novatech (.2); letter to Retail Ecommerce Ventures (.2); revise notice of deposition to Elite Customer Services and Resource Management Investments (.2); emails with S. Chadhry and J. Burns regarding depositions (.2); emails with K. Cantazarite regarding preservation letter to Goat Payments (.2).				
Service	05/20/2022	Research 11th circuit case law on equitable powers of court to take actions in receivership (1.0); revise legal standard excerpt over same, including additional cases (.6).	ВК	1.60	\$235.00	\$376.00
Service	05/21/2022	Emails with S. Chadhry and Receiver regarding postponing deposition of D. Rando if she would agree to extend TRO (.3); emails with Receiver and R. Rohr regarding consumer emails and employee laptops (.2).	KD	0.50	\$360.00	\$180.00
Service	05/22/2022	Retrieve computers from E-Hounds (.5); telephone call with employee LW (.4); confer with Receiver regarding same (.6); email to L. Lafferty regarding depositions (.1); email to D. Bean regarding D. Rando deposition (.1).	KD	1.30	\$360.00	\$468.00
Service	05/23/2022	Download 15 cd's to dropbox; email same to attorney	CR	0.50	\$175.00	\$87.50
Service	05/23/2022	Zoom call with M. Freed, LT Lafferty, and Reciever (.9); prepare for depositions of defendants (3.2); communicate with employees regarding belongings (.3); review Goat emails received from N. Hill (.2); initial review of documents from Fifth Third (2.0); communicate with Receiver regarding living expenses and other outstanding issues (.6); communicate with B. Welke regarding outstanding issues (.4).	KD	7.60	\$360.00	\$2,736.00
Service	05/23/2022	Travel from Tampa to Jacksonville. [Discounted 50%]	KD	3.50	\$360.00	\$630.00
Service	05/24/2022	Continue preparing for deposition of Defendants (.8); take depositions of Michael and Valerie Rando (7.5); emails with counsel for Randos regarding imaging of cellphones and draft motion for living	KD	9.10	\$360.00	\$3,276.00

		expense (.3); confer with Receiver regarding proposed living expenses (.5).				
Service	05/24/2022	Travel from Jacksonville to Tampa. [Discounted 50%}	KD	3.50	\$360.00	\$630.00
Service	05/25/2022	Revise draft motion to modify asset freeze to allow for living expenses (.6); telephone call with emails with consumer SB (.4); emails with B. Welke, R. Rohr and Receiver regarding same (.3); begin review of documents received from Chargebacks911 (1.2); communicate with R. Rohr, B. Welke and Receiver regarding same (.8); conference call with B. Welke, S. Chadhry and T. Neuroth, Electronic Commerce, regarding asset freeze and need for production of documents (.6); confer with S. Amarnani regarding payment of business expenses (.3); telephone call with L. Benitez, counsel for VA Leasing, regarding Lamborghini (.3).	KD	4.50	\$360.00	\$1,620.00
Service	05/26/2022	Review of communication from Chime related to the TRO (.1).	MG	0.10	\$175.00	\$17.50
Service	05/26/2022	Communicate with Receiver regarding Inner Circle (.3); begin review of Inner Circle, YouTube video (.5); conference call with former employee CW (.2); call with employee LW (.5); review documents from VA Leasing and emails with L. Benitez regarding same (.5); review documents from G.O.A.T. (.9); telephone calls with B. Welke (.6); draft response to M. Freed regarding Inner Circle (.4); telephone call with R. Rohr regarding email accounts (.3); telephone call with N. Hill regarding defendants potentially claiming the Fifth amendment (.3); emails with B. Welke, R. Rohr and Receiver regarding same (.3); review Court's Order regarding pending matters (.2).	KD	5.00	\$360.00	\$1,800.00
Service	05/27/2022	Conference call with E. Feeney, Maverick, and B. Welke (.5); communicate with L.T. Lafferty (.3); communicate with B. Welke (.3); left message for S. Forry, BMW Financial (.1); review third-party documents received from FTC (1.5); begin review of caselaw regarding 5th Amendment issues (.7); telephone call with consumer SW (.1)	KD	3.50	\$360.00	\$1,260.00
Service	05/31/2022	Emails with H. Tam, RingCentral, regarding status of preservation (.2); emails with B. Welke and R. Rohr regarding Recurly questions (.3); email to T. Fahmy, counsel	KD	2.10	\$360.00	\$756.00

		for Recurly, regarding same (.1); emails with N. Hill regarding invocation of 5th Amendment (.1); telephone calls with B. Welke regarding outstanding issues (.4); telephone calls to vendors identified on "business" credit card (.3); return calls to consumers (.5); emails with R. Rohr regarding Recurly (.2).				
Service	06/01/2022	Communicate with Receiver regarding business expenses (.3); telephone call with C. Brun regarding Receiver's report (.4); review Defendants' response to motion for preliminary injunction (.4); communicate with B. Welke regarding same (.3); receipt and review of letter from Defendants' counsel regarding 5th Amendment (.1); research regarding same (1.0); call with Rando vendor (.2); review documents from BMW Financial Services (.2); emails with M. Freed regarding BMW lease (.2); review VA leasing documents (.1).	KD	3.20	\$360.00	\$1,152.00
Service	06/02/2022	Conference call with N. Hill and B. Welke regarding 5th Amendment arguments (.7); begin drafting motion for order to show cause (.8); call with M. Eaton, Chargebacks911, regarding services (.4).	KD	1.90	\$360.00	\$684.00
Service	06/03/2022	Confer with B. Kinni regarding 5th Amendment research (.4); emails with N. Hill and B. Welke regarding Kensington property (.1)	KD	0.50	\$360.00	\$180.00
Service	06/03/2022	Confer with K. Donlon regarding background on matter and research needed to overcome 5th amendment privilege (.4); research application of 5th amendment privilege and foregone conclusion doctrine (1.6).	ВК	2.00	\$235.00	\$470.00
Service	06/06/2022	Telephone call with N. Hill regarding motion to show cause (.2); confer with counsel regarding upcoming depositions (.2); confer with C. Brun regarding status update (.4); telephone call with consumer EE (.2); continue revising motion for order to show cause (.5); review Court's order to show cause (.1).	KD	1.60	\$360.00	\$576.00
Service	06/06/2022	Continued research on application of 5th amendment privilege, forgone conclusion doctrine, and application of 5th amendment privilege to act of producing documents (4.4); confer with K. Donlon regarding results of research (.4); draft analysis of research (.7); emails with K. Donlon	ВК	5.70	\$235.00	\$1,339.50

	regarding depositions of FTC investigator and Randos (.2).				
06/07/2022	Communicate with E. Feeney regarding a document production.	MG	0.10	\$175.00	\$17.50
06/07/2022	Review FTC's Supplemental Filing in Support of its Motion for Preliminary Injunction.	KD	0.80	\$360.00	\$288.00
06/07/2022	Complete drafting analysis of research (2.3); circulate same to K. Donlon (.1).	BK	2.40	\$235.00	\$564.00
06/08/2022	Initial review of responsive documents from Maverick (.2).	MG	0.20	\$175.00	\$35.00
06/09/2022	Attend FTC noticed depositions of M. and V. Rando (2.0).	ВК	2.00	\$235.00	\$470.00
06/10/2022	Review and update the TRO entity chart.	MG	0.70	\$175.00	\$122.50
06/10/2022	Return email to court reporter regarding ordering copies of transcript.	ВК	0.10	\$235.00	\$23.50
06/12/2022	Review Defendants' Opposition to Motion for Order to Show Cause.	KD	0.50	\$360.00	\$180.00
06/13/2022	Review and revise Receiver's First Status Report (1.3); telephone call and emails with Receiver regarding same (.3); emails with N. Hill and Receiver regarding Defendants' request for attorney's fees (.2).	KD	1.80	\$360.00	\$648.00
06/13/2022	Attend deposition of FTC Investigator A. Rottner (5.9).	ВК	5.90	\$235.00	\$1,386.50
06/14/2022	Review Defendants' Show Cause Response (.3); research case law relied upon therein (.5); call with K. Donlon regarding Receiver's Response to Defendants Show Cause Response (.4); draft Receiver's Response to Defendants' Show Cause Response (3.9).	ВК	5.10	\$235.00	\$1,198.50
06/15/2022	Emails with K. Donlon regarding Receiver's Response and whether to include alternative position to Court (.3); revise Receiver's Response (.4); call with K. Donlon (.1); compile cited authority in Response for use at hearing (.4).	ВК	1.20	\$235.00	\$282.00
06/16/2022	Prepare for hearing on pending motions.	KD	1.50	\$360.00	\$540.00
06/17/2022	Review FTC's response to Defendants' request for fees (.3); confer with Receiver regarding call with former employee (.3); prepare for preliminary injunction hearing (3.2); confer with B. Kinni regarding 5th	KD	7.00	\$360.00	\$2,520.00
	06/07/2022 06/07/2022 06/08/2022 06/10/2022 06/10/2022 06/13/2022 06/13/2022 06/13/2022 06/13/2022	and Randos (.2).06/07/2022Communicate with E. Feeney regarding a document production.06/07/2022Review FTC's Supplemental Filing in Support of its Motion for Preliminary Injunction.06/07/2022Complete drafting analysis of research (2.3); circulate same to K. Donlon (.1).06/08/2022Initial review of responsive documents from Maverick (.2).06/09/2022Attend FTC noticed depositions of M. and V. Rando (2.0).06/10/2022Review and update the TRO entity chart.06/10/2022Review and update the TRO entity chart.06/11/2022Review Defendants' Opposition to Motion for Order to Show Cause.06/12/2022Review and revise Receiver's First Status Report (1.3); telephone call and emails with Receiver regarding same (.3); emails with N. 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Donlon (.1); compile cited authority in Response for use at hearing (.4).BK06/15/2022Prepare for hearing on pending motions.KD06/16/2022Prepare for hearing on pending motions.KD06/17/2022Review FTC's response to Defendants' request for fees (.3); confer wit	and Randos (.2).06/07/2022Communicate with E. Feeney regarding a document production.MG0.1006/07/2022Review FTC's Supplemental Filing in Support of its Motion for Preliminary Injunction.KD0.8006/07/2022Complete drafting analysis of research (2.3); circulate same to K. Donlon (.1).BK2.4006/08/2022Initial review of responsive documents from Maverick (.2).MG0.2006/09/2022Attend FTC noticed depositions of M. and V. Rando (2.0).BK2.0006/10/2022Review and update the TRO entity chart.MG0.7006/10/2022Return email to court reporter regarding ordering copies of transcript.BK0.1006/11/2022Review Defendants' Opposition to Motion for Order to Show Cause.KD0.5006/13/2022Review and revise Receiver's First Status Report (1.3); telephone call and emails with N. Hill and Receiver regarding Defendants' request for attorney's fees (.2).BK5.9006/14/2022Review Defendants' Show Cause Response (.3); research case law relied upon therein (.5); call with K. Donlon regarding Receiver's Response to Defendants' Show Cause Response (.2).BK5.1006/15/2022Review Defendants' Cause Response (.4); draft Receiver's Response to Defendants' Show Cause Response (.3); revise Response (.3); research case law relied upon therein (.5); call with K. Donlon regarding Receiver's Response to Defendants' Show Cause Response (.3); revise Response for use at hearing (.4).1.2006/15/2022Prepare for hearing on pending motions.KD1.50 <td>and Randos (.2).06/07/2022Communicate with E. Feeney regarding a document production.MG0.10\$175.0006/07/2022Review FTC's Supplemental Filing in Support of its Motion for Preliminary Injunction.KD0.80\$360.0006/07/2022Complete drafting analysis of research (2.3); circulate same to K. 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Hill and Receiver regarding Defendants' request for attorney's fees (.2).BK5.10\$235.0006/13/2022Review Defendants' Show Cause Response to Defendants' Show Cause Response (.4); call with K. Donion regarding Receiver's Response to Defendants' Show Cause Response (.4); call with K. Donion (.1); complie cited authority in Response for use at

		Amendment issues (.5); email to D. Goldman enclosing TRO (.1); meet with employees at office for belonging (.2); attend preliminary injunction hearing (1.6); debrief with Receiver after hearing (.8).				
Service	06/17/2022	Research whether corporation has 5th amendment privilege (.7); conference and emails with K. Donlon regarding same (.4).	ВК	1.10	\$235.00	\$258.50
Service	06/17/2022	Travel from Jacksonville to Tampa. [Discounted 50%]	KD	3.50	\$360.00	\$630.00
Service	06/21/2022	Review final Case Management Report (.1); review Court's minutes regarding Preliminary Injunction hearing (.1).	KD	0.20	\$360.00	\$72.00
Service	06/23/2022	Telephone call to Chambers regarding Court's request for fee information (.1); draft Notice of Providing Fee Information (.6); emails with Receiver regarding same (.2); review Joint Proposed Settlement Conference (.2); communicate with D. Rosenthal, landlord for Credit Game, and Receiver regarding status update (.2);	KD	1.30	\$360.00	\$468.00
Service	06/24/2022	Email from B. Birtolo regarding laptop (.1).	KD	0.10	\$360.00	\$36.00
Service	06/27/2022	Emails with Receiver regarding updates to website and Birtolo laptop (.2); draft update to website (.3); review pleadings to post to website, email to R. During regarding same (.2); email to B. Birtolo regarding laptop (.1).	KD	0.80	\$360.00	\$288.00
Service	06/29/2022	Review 754 actions and communicate with team regarding same (.3); review Court's order on fees and pending motions (.3); begin drafting motion for fees (.4); receipt and review inquiry from Department of Revenue regarding First Coast Matchmakers (.2).	KD	1.20	\$360.00	\$432.00
Service	07/01/2022	Conference call with M. Freed, J. Osborne, B. Welke and H. Park regarding issues related to preliminary injunction hearing (.5); conference call with B. Welke and M. Yip regarding outstanding issues (.6); telephone call and letter to K. Priest, Truist, regarding transfer of funds (.7).	KD	1.80	\$360.00	\$648.00
		L	ine Item Discou	nt Subi	total	-\$3,150.00

Services Subtotal \$55,666.50

Expenses

Туре	Date	Description	Quantity	Rate	Total
Expense	05/05/2022	Hyatt Regency - Hotel stay in Jacksonville, FL during Immediate Access.	1.00	\$978.05	\$978.05
Expense	05/06/2022	Mileage reimbursement - Travel to/from Jacksonville, FL by Receiver to attend Immediate Access (510 miles x .585 = 298.35).	1.00	\$298.35	\$298.35
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, Eastern District of California.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, Northern District of California.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, Southern District of California.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, Central District of California.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, District of Minnesota.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, District of Nevada.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, District of New Jersey.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, Northern District of Florida.	1.00	\$49.00	\$49.00
Expense	05/11/2022	Filing fee for Miscellaneous Action in USDC, Southern District of Florida.	1.00	\$49.00	\$49.00
Expense	05/16/2022	Tampa Legal - Copies of packets for USDC miscellaneous action filings.	1.00	\$322.82	\$322.82
Expense	05/26/2022	Veritext, LLC - Cost for court reporter to attend depositions of Michael and Valerie Rando on 5/24/22.	1.00	\$635.00	\$635.00
Expense	05/26/2022	Mileage reimbursement - Travel to/from Jacksonville, FL by Receiver to attend depositions of M. Rando and V. Rando (390miles x .585 = 228.15).	1.00	\$228.15	\$228.15
Expense	06/01/2022	Veritext, LLC - Cost for deposition transcripts for Michael and Valerie Rando.	1.00	\$2,312.03	\$2,312.03
Expense	06/15/2022	Overnight mail to USDC - District of NJ on May 11, 2022.	1.00	\$84.91	\$84.91
Expense	06/15/2022	Overnight mail to USDC - District of MN on May 11, 2022.	1.00	\$87.29	\$87.29
Expense	06/15/2022	Overnight mail to USDC - Central District of CA on May 11, 2022.	1.00	\$107.14	\$107.14

Expense	06/15/2022	Overnight mail to USDC - Northern District of CA on May 11, 2022.	1.00	\$107.14	\$107.14
Expense	06/15/2022	Overnight mail to TSYS Payment Solutions on May 12, 2022.	1.00	\$45.90	\$45.90
Expense	06/15/2022	Overnight mail to Navy Federal Credit Union on May 12, 2022.	1.00	\$43.73	\$43.73
Expense	06/15/2022	Overnight mail to USDC - Southern District of NY on May 11, 2022.	1.00	\$84.91	\$84.91
Expense	06/15/2022	Overnight mail to Webull Financial LLC on May 12, 2022.	1.00	\$79.43	\$79.43
Expense	06/15/2022	Overnight mail to USDC - Southern District of CA on May 11, 2022.	1.00	\$126.64	\$126.64
Expense	06/15/2022	Overnight mail to USDC - District of NV on May 11, 2022.	1.00	\$107.14	\$107.14
Expense	06/15/2022	Overnight mail to USDC - Eastern District of CA on May 11, 2022.	1.00	\$107.14	\$107.14
Expense	06/15/2022	Overnight mail to USDC - Northern District of FL on May 11, 2022.	1.00	\$39.90	\$39.90
Expense	06/15/2022	Overnight mail to USDC - Western District of NC on May 11, 2022.	1.00	\$78.51	\$78.51
Expense	06/15/2022	Overnight mail to Cash App on May 17, 2022.	1.00	\$51.10	\$51.10
Expense	06/15/2022	Overnight mail to Charles Schwab on May 19, 2022.	1.00	\$30.75	\$30.75
Expense	06/17/2022	Mileage reimbursement to K. Donlon for travel to Jacksonville, FL to attend preliminary injunction hearing.	1.00	\$136.89	\$136.89

Expenses Subtotal \$6,533.92

Time Keeper	Quantity	Rate	Discount	Total
Katherine Donlon	141.8	\$360.00	-\$3,150.00	\$47,898.00
Brad Kinni	27.1	\$235.00	-	\$6,368.50
Mary Gura	7.5	\$175.00	-	\$1,312.50
Charmayne Rolon	0.5	\$175.00	-	\$87.50
			Subtotal	\$62,200.42
			Total	\$62,200.42

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
5988	07/07/2022	\$62,200.42	\$0.00	\$62,200.42
			Outstanding Balance	\$62,200.42
			Total Amount Outstanding	\$62,200.42

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

Payment is due upon receipt.

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EXHIBIT 4



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE SUMMARY OF PROFESSIONALS

Maria M. Yip, Receiver 2 South Biscayne Blvd. Suite 2690 Miami, FL 33131 Invoice Number: 31242 Date: July 8, 2022

Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

For Professional Services Rendered May 1, 2022 through July 1, 2022

Professional	Initials	Position	Experience	Hours	Rate	Fees
Cristal Brun, MBA	CB	Lead Forensic Accountant	20 Years	77.0	\$ 295.00	\$ 22,715.00
Cristal Brun, MBA ¹	CB	Lead Forensic Accountant	20 Years	6.5	75.00	487.50
Shawna B. Amarmani, CPA, CFE, CIRA	SBA	Lead Forensic Accountant	11 Years	92.4	295.00	27,258.00
Shawna B. Amarmani, CPA, CFE, CIRA ²	SBA	Lead Forensic Accountant	11 Years	9.2	148.00	1,361.60
Shawna B. Amarmani, CPA, CFE, CIRA	SBA	Lead Forensic Accountant	11 Years	1.1	75.00	82.50
Danny D. Zamorano, CPA	DDZ	Lead Forensic Accountant	6 Years	53.4	295.00	15,753.00
Susan Y. Tai	SYT	Senior Forensic Accountant	8 Years	135.9	225.00	30,577.50
Susan Y. Tai ²	SYT	Senior Forensic Accountant	8 Years	12.1	113.00	1,367.30
Charles D. Bailey, CFE	CDB	Senior Forensic Accountant	6 Years	110.4	225.00	24,840.00
Charles D. Bailey, CFE ²	CDB	Senior Forensic Accountant	6 Years	17.7	113.00	2,000.10
Gabriella M. Martell, CPA, CFE	GMM	Senior Forensic Accountant	5 Years	33.7	225.00	7,582.50
Gabriella M. Martell, CPA, CFE ¹	GMM	Senior Forensic Accountant	5 Years	17.0	75.00	1,275.00
Christopher M. Vatti	CMV	Senior Forensic Accountant	6 Years	62.2	225.00	13,995.00
Christopher M. Vatti ²	CMV	Senior Forensic Accountant	6 Years	6.8	113.00	768.40
Christopher F. Leo, CFE	CFL	Senior Forensic Accountant	8 Years	8.4	225.00	1,890.00

Total Fees:

\$ 151,953.40

643.8

Note:

¹The time incurred in connection with communicating with customers has been billed at a lower rate of \$75.

²Travel time has been charged at 50% of the discounted billing rate.



FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS

INVOICE DETAIL YIP ASSOCIATES	

Maria M. Yip, Receiver 2 South Biscayne Blvd. Suite 2690 Miami, FL 33131 Invoice Number: 31242 Date: 07/08/2022

Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/02/22	CDB	Travel from Richmond to Jacksonville. [Billed at 50% of the discounted hourly billing rate]	7.6	\$113	\$ 858.80
05/02/22	SBA	Travel from Boca Raton to Jacksonville. [Billed at 50% of the discounted hourly billing rate]	4.6	\$148	\$ 680.80
05/02/22	SYT	Travel from Tallahassee to Jacksonville. [Billed at 50% of the discounted hourly billing rate]	2.8	\$113	\$ 316.40
05/04/22	SBA	Prepared for Immediate Access; debriefing, Immediate Access review with FTC and forensics team, met with law enforcement; went to Lionshare co-work space and interviewed front office; Immediate Access at current location. [Actual time = 15.0]	12.0	\$295	\$ 3,540.00
05/04/22	CDB	Met with full team to discuss Immediate Access; met with law enforcement prior to Immediate Access; visited previously known secondary location; traveled to and from main location; monitored employees to ensure compliance with orders from Receiver, searched cubicles, offices, storage areas and trash cans for documentation and keys; compiled key documentation for scanning. [Actual time = 17.0]	12.0	\$225	\$ 2,700.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/04/22	CMV	Prepared for Immediate Access; debriefing, Immediate Access review with FTC and forensics team; met with law enforcement; went to Atlantic Avenue address; Immediate Access at Beach Blvd location. [Actual time = 15.0]	12.0	\$225	\$ 2,700.00
05/04/22	SYT	Prepared for Immediate Access; debriefing, Immediate Access review with FTC and forensics team, met with law enforcement; went to Atlantic avenue address; Immediate Access at Beach Blvd location. [Actual time = 15.0]	12.0	\$225	\$ 2,700.00
05/05/22	SBA	Contacted employees to schedule interviews; searched offices and computers for information; also attended interview of former employee.	11.1	\$295	\$ 3,274.50
05/05/22	CDB	Searched, gathered and scanned documentation from cubicles, offices, and storage; downloaded documentation from DocuSign. [Actual time = 14.0]	12.0	\$225	\$ 2,700.00
05/05/22	CMV	Reviewed and scanned documents identified in cubicles and offices; visited UPS and storage locations to redirect mail to Receiver and restrict access to storage facility; handled the changing of locks with locksmith. [Actual time = 13.0]	12.0	\$225	\$ 2,700.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
05/05/22	SYT	Performed downloads of daily transactions from Authorized.net; performed downloads of Google documents and copied user profiles from individual computers. [Actual time = 14.0]	12.0	\$225	\$ 2,700.00
05/06/22	SBA	Travel from Jacksonville to Boca Raton. [Billed at 50% of the discounted hourly billing rate]	4.6	\$148	\$ 680.80
05/06/22	SBA	Searched offices for relevant documents, gathered records, and analyzed computer records including Google drive documents.	6.9	\$295	\$ 2,035.50
05/06/22	CDB	Assisted with gathering, reviewing and scanning of documentation on site; downloaded computer hard drives; photographed the office.	11.0	\$225	\$ 2,475.00
05/06/22	CMV	Travel from Jacksonville to Boston. [Billed at 50% of the discounted hourly billing rate]	6.8	\$113	\$ 768.40
05/06/22	CMV	Scanned documents identified; search offices for relevant documents; search for and analyze Google drive and documents on individual hard drives.	8.5	\$225	\$ 1,912.50
05/06/22	SYT	Continued with downloading daily transactions from Authorized.net; continued downloading Google documents and copied user profiles from individual computers.	11.0	\$225	\$ 2,475.00
05/07/22	CDB	Downloaded photographs of the office.	0.4	\$225	\$ 90.00

YIP ASSOCIATES FORENSIC ACCOUNTING + FINANCIAL INVESTIGATIONS Invoice Number: 31242

Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/07/22	CDB	Travel from Jacksonville to Richmond. [Billed at 50% of the discounted hourly billing rate]	10.1	\$113	\$ 1,141.30
05/07/22	SYT	Travel from Jacksonville to Tallahassee. [Billed at 50% of the discounted hourly billing rate]	2.8	\$113	\$ 316.40
05/08/22	SBA	Analyzed records obtained from B. Birtolo's computer and researched possible related entities.	1.4	\$295	\$ 413.00
05/09/22	SBA	Meeting with Receiver, CDB, SYT and CMV regarding customers, disabling content, employees, related parties and various tasks (1.2); analyzed records from B. Birtolo's Google drive and categorized (2.8); investigated potentially related entities (.9); researched missing employee contact information (1.6); reviewed QuickBooks online activity (.7); discussed case and plan of action with CDB (.1); discussion with CMV regarding organization of scanned documents (.1).	7.4	\$295	\$ 2,183.00
05/09/22	CDB	Compiled and prepared photographs of the Defendants' office (.2); discussed case and plan of action with SBA (.1); prepared and organized documentation supporting the summary of findings and organized binder (3.1); meeting with Receiver, CDB, SYT and CMV regarding customers, disabling content, employees, related parties and various tasks (1.2); attempted to log into Defendants' social media accounts and documented findings (2.2).	6.8	\$225	\$ 1,530.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
05/09/22	CMV	Discussion with SBA regarding organization of scanned documents (.1); organized scanned documents (3.2); review Google drive files from B. Birtolo (.2); meeting with Receiver, CDB, SYT and CMV regarding customers, disabling content, employees, related parties and various tasks (1.2); gather and send documents to FTC (.4); update Bank Matrix with detail from Fifth Third Bank fax and information found within the Credit Game office (1.1); download and analyze Authorize.net transactions (2.4); update Bank Matrix with GL detail (.5).	9.1	\$225	\$ 2,047.50
05/09/22	SYT	Meeting with Receiver, SBA, CDB, and CMV regarding customers, disabling content, employees, related parties and various tasks (1.2); analyzed records from B. Birtolo's Google drive and categorized documents (2.8); investigated potentially related entities (.9); researched missing employee contact information (1.6); reviewed QuickBooks online activity (.7).	7.2	\$225	\$ 1,620.00
05/10/22	SBA	Drafted preliminary summary of findings for Receiver (6.5); discussion with SYT, CMV and CDB to review preliminary summary of findings (1.4); conference call with Receiver, SYT, CMV and CDB regarding Receiver's First Interim report and tasks (.9).	8.8	\$295	\$ 2,596.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
05/10/22	CDB	Researched defendants to identify additional potential related entities and documented results (3.5); discussion with SBA, SYT, and CMV to review preliminary summary of findings (1.4); researched defendants' for ownership of properties in Duval County (.4); conference call with Receiver, SBA, SYT, and CMV regarding Receiver's First Interim report and tasks (.9).	6.2	\$225	\$ 1,395.00
05/10/22	CMV	Analyzed Authorize.net transactions (3.4); updated bank matrix (.3); created bank analysis from QuickBooks general ledger (1.9); assembled list of known payment methods and details regarding those methods (.3); discussion with SBA, CDB, and SYT to review preliminary summary of findings (1.4); conference call with Receiver, SBA, SYT, and CDB regarding Receiver's First Interim report and tasks (.9).	8.2	\$225	\$ 1,845.00
05/10/22	SYT	Discussion with SBA, CMV and CDB to review preliminary summary of findings (1.4); uploaded workstation files to E-Hounds (1.9); conference call with Receiver, SBA, CMV, and CDB regarding Receiver's First Interim report and tasks (.9).	4.2	\$225	\$ 945.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/11/22	SBA	Contacted locksmith to provide payment (.2); contacted E-Hounds regarding cell phones, social media/websites and obtaining data (.8); coordinated data analysis and sending data to E-Hounds with team (.6); performed key word searches on documents from computers in search for assets and entities for 28 USC 754 letters (1.8); analyzed records from computers (2.7).	6.1	\$295	\$ 1,799.50
05/11/22	CMV	Analyzed Authorize.net transactions (1.8); updated Bank Matrix with information provided by defendant's counsel (.2).	2.0	\$225	\$ 450.00
05/11/22	SYT	Review of Google documents and computer files downloaded to be zipped and uploaded to E-Hounds.	7.8	\$225	\$ 1,755.00
05/12/22	SBA	Prepared summary of findings for Receiver's hearing (1.0); analyzed Authorized.net data, prepared summary chart and provided to Receiver (.9); discussed Authorize.net information with Receiver (.2); analyzed open orders schedule (.6); analyzed additional potentially related entities (.5); communications with E-Hounds regarding websites (.2).	3.4	\$295	\$ 1,003.00
05/12/22	CMV	Discussion with locksmith regarding opening storage unit.	0.5	\$225	\$ 112.50

YIP ASSOCIATES

Invoice Number: 31242

Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
05/12/22	SYT	Continued review of Google documents and computer files downloaded to be zipped and uploaded to E-Hounds.	8.1	\$225	\$ 1,822.50
05/13/22	SYT	Continued review of Google documents and computer files downloaded to be zipped and uploaded to E-Hounds.	7.0	\$225	\$ 1,575.00
05/16/22	SBA	Analyzed open orders and prepared a schedule of customers and the amounts and contact information (1.6); reviewed sunbiz.org annual reports, articles of organization, and entity details for all defendants (.8); reviewed mail that came to UPS boxes (.3).	2.7	\$295	\$ 796.50
05/17/22	SBA	Conference call with Receiver and SYT re: documents, consumers and IT (1.0); coordinated document upload options for Receivership website with KTek (.9); credit game academy open orders analysis and sent to FTC (1.1); performed searches on documents from Defendants for prime and various email addresses (1.5).	4.5	\$295	\$ 1,327.50
05/17/22	SYT	Conference call with Receiver and SBA re: documents, consumers and IT (1.0); prepared archive files of individual user's Google passwords to be uploaded to FTC (2.5)	3.5	\$225	\$ 787.50
05/18/22	CDB	Researched and compiled information and documentation for affiliate entities and researched and compiled documentation for related entities from SunBiz.	1.7	\$225	\$ 382.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/18/22	SYT	Conference call with R. Rohr regarding new Authorize.net account.	0.5	\$225	\$ 112.50
05/19/22	SBA	Analyzed Credit Game Academy Orders other tabs, compared to open orders tab and provided schedule and explanation to FTC.	1.6	\$295	\$ 472.00
05/19/22	SYT	Performed analysis of Authorize.net merchant transactions.	2.0	\$225	\$ 450.00
05/20/22	SBA	Reviewed financial disclosures provided by Defendants for Valerie Rando, Michael Rando and entities DBS, FCM, FCMG and PTT and updated bank matrix, entity list and professional list.	1.9	\$295	\$ 560.50
05/20/22	SYT	Reviewed all documents obtained re: organizational charts or business documentation reflecting their personal emails; uploaded files to FTC; review of outstanding PayPal, website, and payment processing accounts to be locked down.	7.9	\$225	\$ 1,777.50
05/23/22	SYT	Looked into GreenTreeCreditUp.com by former Elite Deletion employee "Diana".	0.6	\$225	\$ 135.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
05/24/22	SBA	Analysis of potential related entity Green Tree Credit Up (.6); discussion with Receiver regarding consumer emails and voicemail's, Inner Circle and document review (.5); coordinate voicemail responses (.5); inner circle analysis of customer list and search for related records (1.1); review emails and new documents received from counsel and instructed SYT and bank account analysis (.8).	3.5	\$295	\$ 1,032.50
05/24/22	SYT	Bank analysis of Defendant's bank accounts held at Fifth Third Bank for the following entities and individuals: Michael S Rando - MR Protection Trust 3/19/218; Prosperity Training Technology LLC; Legacy Matchmaking LLC; First Coast Matchmakers Inc; Dr. Steves Caffeine Melts, LLC; Moneygame LLC; Elite Customer Services; Education Training and Consulting LLC; Digital Business Scaling LLC; Digital Growth Enterprises; Valerie Rando - VR Protection Trust Dated March 19, 2018 (6.9); discussion with Receiver re: IT issues (.5).	7.4	\$225	\$ 1,665.00
05/25/22	SBA	Responded to customer voicemails and emails in response to inquiries re: Receivership (.9); call with Receiver's Counsel K. Donlon regarding business expenses (.6); tended to various emails throughout the day regarding Chargebacks 911, merchant accounts, joint motion to release funds (1.6); reviewed Fifth Third bank activity (.5).	3.6	\$295	\$ 1,062.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/25/22	SYT	Continued bank analysis of Defendant's bank accounts held at Fifth Third Bank for the following entities and individuals: Michael S Rando - MR Protection Trust 3/19/218; Prosperity Training Technology LLC; Legacy Matchmaking LLC; First Coast Matchmakers Inc; Dr. Steves Caffeine Melts, LLC; Moneygame LLC; Elite Customer Services; Education Training and Consulting LLC; Digital Business Scaling LLC; Digital Growth Enterprises; Valerie Rando - VR Protection Trust Dated March 19, 2018.	7.8	\$225	\$ 1,755.00
05/26/22	SBA	Discussion with CFL on analysis of checks and deposits from Fifth Third Bank (.3); researched Inner Circle customers (1.8); discussion of Inner Circle customers with CDB (.1); research and responded to email from counsel regarding Prosperity employee (.3).	2.5	\$295	\$ 737.50
05/26/22	CDB	Discussed contracts for customers of the Inner Circle membership group with SBA (.1); searched for and compiled contracts for customer of the Inner Circle membership group (3.1).	3.2	\$225	\$ 720.00
05/26/22	SYT	Discussion with CB and UPS personnel re: mail forwarding.	0.3	\$225	\$ 67.50
05/26/22	CFL	Discussion with SBA on analysis of checks and deposits from Fifth Third Bank (.3); analyzed Fifth Third Bank checks and deposits (7.8).	8.1	\$225	\$ 1,822.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
05/27/22	СВ	Discussion with counsel (.1); discussion with SYT and UPS personnel re: mail forwarding (.3); reviewed documents from site, including program documents, enrollment, and scripts (.9).	1.3	\$295	\$ 383.50
05/27/22	CB	Conversation with customers who contacted Receiver via receivership website regarding experience with Corporate Defendants.	2.4	\$75	\$ 180.00
05/31/22	CB	Discussion with CFL re: analysis of Fifth Third Bank checks and deposits (.3).	0.3	\$295	\$ 88.50
05/31/22	SYT	Performed bank analysis for Fifth Third Bank accounts and American Express accounts.	7.9	\$225	\$ 1,777.50
05/31/22	CFL	Discussion with CB re: analysis of Fifth Third Bank checks and deposits.	0.3	\$225	\$ 67.50
06/01/22	CB	Discussed case and Receiver's First Interim draft report with CDB (1.0); document review in response to request (.7).	1.7	\$295	\$ 501.50
06/01/22	CDB	Discussed case and Receiver's First Interim draft report with CB (1.0); summarized scripts documents/enrollment (3.3).	4.3	\$225	\$ 967.50
06/01/22	SYT	Continued with bank analysis for Fifth Third Bank accounts and American Express accounts.	7.9	\$225	\$ 1,777.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/02/22	CB	Discussion with CDB re: document review and preparation of Receiver's First Interim draft report (.8); worked on Receiver's First Interim report outline, reviewed bank analysis and asset support (3.6).	4.4	\$295	\$ 1,298.00
06/02/22	CDB	Reviewed/summarized package offerings (3.6); Discussion with CB re: document review and preparation of Receiver's First Interim draft report (.8).	4.4	\$225	\$ 990.00
06/02/22	GMM	Review of email communications from customers to Receiver regarding experience with Corporate Defendants.	9.1	\$75	\$ 682.50
06/02/22	SYT	Continued with bank analysis for Fifth Third Bank accounts and American Express accounts.	7.9	\$225	\$ 1,777.50
06/03/22	СВ	Reviewed documents including documents collected on site, marketing material, summarized documents imaged/collected for report (3.3); discussion with CDB re: Receiver's First Interim draft report (.3); prepared summaries of call back discussion with customer and former employee (1.8); discussion with GMM re: email review/tracking (.1); discussion with R. Rohr re: data preservation (1.0).	6.5	\$295	\$ 1,917.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/03/22	CB	Telephone conversation with former employee regarding experience with Corporate Defendants (1.3); telephone conversation with customer regarding experience with Corporate Defendants (1.0).	2.3	\$75	\$ 172.50
06/03/22	CDB	Prepared summaries of BBB customer complaints, and related entities for Receiver's First Interim Report (4.5); discussed Receiver's First Interim draft report with CB (.3).	4.8	\$225	\$ 1,080.00
06/03/22	GMM	Assisted with preparation of background summary for Receiver's First Interim report (2.2); discussion with CB re: email review/tracking (.1).	2.3	\$225	\$ 517.50
06/03/22	GMM	Review of email communications from customers to Receiver regarding experience with Corporate Defendants.	3.4	\$75	\$ 255.00
06/03/22	SYT	Continued with bank analysis for Fifth Third Bank accounts and American Express accounts.	7.9	\$225	\$ 1,777.50
06/04/22	CB	Reviewed FTC responsive documents (document production) (2.6); assisted with preparation of Receiver's First Interim report (1.5).	4.1	\$295	\$ 1,209.50
06/05/22	GMM	Assisted with preparation of Receiver's First Interim Report, including review of interview notes (2.1); review of Financial disclosures (2.7).	4.8	\$225	\$ 1,080.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/06/22	СВ	Discussion with CDB re: Receiver's First Interim report write-up, background programs, and document review (.7); reviewed Corporate Defendants' liability/payable related documents (.5); assisted with preparation of Receiver's First Interim report and reviewed financial disclosure documents/correspondence (2.8); discussion with counsel re: status update (.3); discussion with DDZ re: MR Protection Trust analysis (.5).	4.8	\$295	\$ 1,416.00
06/06/22	SBA	Coordinated IT and social media matters, response to emails, voicemails, and return of personal belongings.	2.1	\$295	\$ 619.50
06/06/22	DDZ	Reviewed and analyzed bank activity and open orders (4.5); discussion with CB re: MR Protection Trust analysis (.5).	5.0	\$295	\$ 1,475.00
06/06/22	CDB	Discussed Receiver's First Interim report with CB (.7); reviewed documents and summarized operations, marketing strategies, and sales process (7.6).	8.3	\$225	\$ 1,867.50
06/06/22	GMM	Prepared an analysis of the existing liabilities.	4.6	\$225	\$ 1,035.00
06/06/22	SYT	Continued with bank analysis for Fifth Third Bank accounts and American Express accounts.	4.1	\$225	\$ 922.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
06/07/22	CB	Assisted with preparation of Receiver's First Interim report (5.5); discussion with CDB re: complaints and correspondence for Receiver's First Interim Report (.5); reviewed keyword searches/discovery platform upload (.8); discussions with DDZ re: bank/asset analysis/workplan (1.0); email correspondence/payment of outstanding bills (.3).	8.1	\$295	\$ 2,389.50
06/07/22	CB	Telephone conversation with customer regarding experience with Corporate Defendants.	0.3	\$75	\$ 22.50
06/07/22	SBA	Conference call with R. Rohr re: document preservations, social media, websites and eDiscovery platform (1.5); access and review of eDiscovery platform for documents related to assets and liabilities (1.1); callrail and ring central analysis (.9); coordinated with IT re: response to customer emails received from Receiver's website (.9).	4.4	\$295	\$ 1,298.00
06/07/22	DDZ	Continued analysis of customer orders (3.2); reviewed and analyzed Fifth Third Bank account activity of the Corporate Defendants (2.4); discussions with CB re: bank/asset analysis/workplan (1.0).	6.6	\$295	\$ 1,947.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/07/22	CDB	Discussion with CB re: complaints and correspondence for Receiver's First Interim report (.5); searched for additional defendant-owned properties, mortgages, and encumbrances (1.5); reviewed mail received to UPS box on 6/6/22 (.4); reviewed payables and created spreadsheet of payables (.6).	3.0	\$225	\$ 675.00
06/07/22	CDB	Reviewed recorded inbound and outbound sales calls between customers and Credit Game's sales personnel.	3.2	\$225	\$ 720.00
06/07/22	CMV	Researched employee titles and start dates in employee personnel files.	0.9	\$225	\$ 202.50
06/07/22	GMM	Prepared analysis of the existing assets (2.3); prepared analysis of the existing liabilities (2.1); performed analysis of Defendant's credit cards (1.2); communication with vendor (.4).	6.0	\$225	\$ 1,350.00
06/08/22	CB	Discussion with DDZ re: bank analysis (.8); discussion with CDB re: Receiver's First Interim report (.9); assisted with preparation of Receiver's First Interim report draft, and reviewed supporting documentation (4.1); discussion with CDB re: related entities (.6); correspondence/coordinated bill payment (.8); correspondence and discussion with R. Rohr re: data preservation/call recording downloads/contracts/agreements (.7). [Actual time = 12.0]	7.9	\$295	\$ 2,330.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
06/08/22	SBA	Researched entities including searches on E-Hounds platform and electronic discovery (3.3); communications with R. Rohr re: key word searches (.4).	3.7	\$295	\$ 1,091.50
06/08/22	DDZ	Continued review and analysis of Fifth Third Bank activity of the Receivership Defendants (3.4); discussion with CB re: bank analysis (.8); prepared schedules of sources and uses for each Receivership Defendant (4.2). [Actual time = 11.4]	8.4	\$295	\$ 2,478.00
06/08/22	CDB	Discussed Receiver's First Interim report and supporting documentation with CB (.9); discussed related entities with CB (.6); prepared chart of relationship of organizations (.9); reviewed documentation of properties and prepared summary of rental properties, property transactions, and lease agreements for rental properties (2.9); discussed samples of calls with CMV (.1); prepared documentation for exhibits in Receiver's First Interim report (.6); reviewed recorded inbound and outbound sales calls between customers and Credit Game's sales personnel (2.7). [Actual time = 9.7]	8.7	\$225	\$ 1,957.50
06/08/22	CMV	Discussion with DDZ regarding Bank Account Analysis (.4); updated the Bank Account analyses (2.3); reviewed sales call transactions (.7); discussed samples of calls with CDB (.1).	3.5	\$225	\$ 787.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount
06/08/22	GMM	Review of email communications from customers to Receiver regarding experience with Corporate Defendants.	3.1	\$75	\$ 232.50
06/08/22	SYT	Analysis of customers "Open Orders" and "Other" sales.; call with SBA re status of storage unit, incoming mail from UPS stores, and return of personal effects to employees.	0.5	\$225	\$ 112.50
06/09/22	CB	Assisted with preparation of Receiver's First Interim report (2.6); reviewed analysis of related entities/Defendants (.6); discussion with GMM re: asset and liability analysis (.5); discussions with DDZ re: bank account analysis (.7); discussion with CDB re: Receiver's First Interim report draft (1.3); discussion with Receiver re: Receiver's First Interim report and status update (1.4); review of asset and liability analysis and schedules (.6); discussion with R. Rohr re: recordings/data preservation (.3). [Actual time = 12.5]	8.0	\$295	\$ 2,360.00
06/09/22	DDZ	Assisted with preparation of Receiver's First Interim report (4.3); reviewed documents produced, including credit reports and financial disclosures of Receivership Defendants (1.7); continued preparation of schedules of sources and uses for Receivership Defendants (1.3); discussions with CB re: bank account analysis (.7). [Actual time = 9.8]	8.0	\$295	\$ 2,360.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/09/22	CDB	Assisted with summarizing inbound and outbound customer call recordings for Receiver's First Interim report (1.0); prepared supporting documentation (2.1); discussed Receiver's First Interim report draft with CB (1.3). [Actual time = 4.4]	3.1	\$225	\$ 697.50
06/09/22	CMV	Prepared sources and uses schedules (1.1); updated Bank Matrix for information on credit reports (1.0).	2.1	\$225	\$ 472.50
06/09/22	GMM	Continue review and analysis of the existing assets and liabilities, prepared summary of findings (3.7); discussion with CB re: asset and liability analysis (.5); prepared analysis and schedules re: credit card debts (1.2); discussion with Receiver re: Receiver's First Interim report and assets analysis (.3).	5.7	\$225	\$ 1,282.50
06/09/22	GMM	Review of email communications from customers to Receiver regarding experience with Corporate Defendants.	1.4	\$75	\$ 105.00
06/10/22	СВ	Assisted with preparation of Receiver's First Interim report (9.1); reviewed schedules of asset and liabilities analysis (1.7); researched related entities (.9). [Actual time = 13.3]	11.7	\$295	\$ 3,451.50
06/10/22	DDZ	Assisted with preparation of Receiver's First Interim Report. [Actual time = 11.3]	8.3	\$295	\$ 2,448.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	 Amount
06/10/22	CDB	Continued to assist with preparation of Receiver's First Interim report (1.0); reviewed real estate entities (.7); prepared summaries of non-defendant individuals and entities (.4); prepared summary of related real estate entities (.7).	2.8	\$225	\$ 630.00
06/10/22	CMV	Updated Bank Matrix based on information gathered from credit reports analyzed (2.1) ; created schedules summarizing outstanding balances based on the credit report analysis (1.3) . [Actual time = 5.4]	3.4	\$225	\$ 765.00
06/10/22	GMM	Assisted Receiver with preparation of Receiver's First Interim report (3.5); worked on credit card and cash analysis schedules for Receiver's First Interim report (4.1); prepared exhibits for the liabilities and asset analysis (1.1); called tax collector's office (.4).	9.1	\$225	\$ 2,047.50
06/11/22	СВ	Assisted Receiver with preparation of Receiver's First Interim Receiver report (2.1); discussion with DDZ re: same (.5); discussion with GMM re: Receiver's Interim report (.6)	3.2	\$295	\$ 944.00
06/11/22	DDZ	Assisted Receiver with preparation of Receiver's First Interim Report (2.3); discussion with CB re: same (.5).	2.8	\$295	\$ 826.00
06/11/22	CDB	Reviewed supporting documentation for draft report sent by E-Hounds (.5).	0.5	\$225	\$ 112.50
06/12/22	DDZ	Preparation of Exhibits for Receiver's First Interim Report.	2.1	\$295	\$ 619.50



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	te Amount	
06/12/22	CDB	Reviewed Receiver's First Interim report to ensure all supporting documentation was included, and tied back to report (1.7); prepared summary of turnover and preservation letters (.5); reviewed depositions of Michael and Valerie Rando (2.1); prepared summaries of sources and uses of funds (1.1); prepared non-defendant entities' list (.6); assisted with preparation of Receiver's First Interim report (1.6).	7.6	\$225	\$	1,710.00
06/13/22	CB	Assisted with preparation of Receiver's First Interim Report (5.5); discussion with CDB re: same (.3).	5.8	\$295	\$	1,711.00
06/13/22	SBA	Assisted with preparation of Receiver's First Interim Report (.5); reviewed deposition of Valerie Rando (1.6); provided Receiver with excerpts of deposition transcripts as requested (1.8); researched Valerie Rando's involvement including reviewing E-Hounds platform documents (.9).	4.8	\$295	\$	1,416.00
06/13/22	SBA	Review of email communications from customers to Receiver regarding experience with Corporate Defendants.	1.1	\$75	\$	82.50
06/13/22	DDZ	Assisted Receiver with preparation of Receiver's First Interim report.	6.2	\$295	\$	1,829.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	Amount		
06/13/22	CDB	Discussed Receiver's First Interim report with CB (.3); assisted Receiver with preparation of Receiver's First Interim report and exhibit preparation (6.1).	6.4	\$225	\$	1,440.00	
06/15/22	CB	Discussion with DDZ re: GOAT merchant (.3); reviewed correspondence from e-discovery platform (.1); discussion with R. Rohr re: Call Central (.3).	0.7	\$295	\$	206.50	
06/15/22	DDZ	Discussion with CB re: GOAT merchant.	0.3	\$295	\$	88.50	
06/16/22	СВ	Discussion with Receiver and DDZ re: next steps/analysis (1.0); next steps discussions with GMM (.9); gathered credit card support (.2); coordinated return of personal belongings (.9); discussions with UPS re: mail pick-up (.7); discussion with DDZ re: next steps (.2).	3.9	\$295	\$	1,150.50	
06/16/22	CB	Review of email communications from customers to Receiver regarding experience with Corporate Defendants.	1.5	\$75	\$	112.50	
06/16/22	DDZ	Discussion with Receiver and CB re: next steps/analysis (1.0); reviewed additional bank records of the Receivership entities (4.5); discussion with CB re: next steps (.2).	5.7	\$295	\$	1,681.50	
06/16/22	GMM	Prepared key documents for hearing (.3); next step discussions with CB (.9).	1.2	\$225	\$	270.00	



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	ours Rate		Amount		
06/17/22	СВ	Researched Defendant's rental property/sale/current ownership (1.4); reviewed summary re: rental properties (.2); researched "Country and friends" on e-discovery platform and reviewed documents gathered/documented findings (1.2); response to requests from Receiver in preparation for hearing (1.3).	4.1	\$295	\$	1,209.50		
06/21/22	CB	Discussion with R. Rohr re: social media platforms and monetized sources.	0.5	\$295	\$	147.50		
06/29/22	SYT	Prepared Release Chain of Custody form for B. Birtolo personal items (.1); return documents to office and storage facility (.3).	0.4	\$225	\$	90.00		
06/29/22	SYT	Travel from Tallahassee to/from Jacksonville (6.5). [Billed at 50% of the discounted hourly billing rate]	6.5	\$113	\$	734.50		
		Total Fees	643.8		\$	151,953.40		



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

Date	Initials	Description	Hours	Rate	A	mount
		Expenses				
05/06/22	CDB	Roundtrip Mileage reimbursement - Travel to/from Miami to Jacksonville (700 miles x $.585 =$ \$409.50) ¹			\$	409.50
05/06/22	CDB	Lodging - Hyatt Regency (05/02/22 - 05/06/22)			\$	820.80
05/06/22	CDB	Per diem food allowance for (05/02/22 - 05/06/22)			\$	236.00
05/06/22	CMV	Roundtrip Mileage reimbursement - Travel to/from Miami to Jacksonville (700 miles x $.585 =$ $$409.50)^{1}$			\$	409.50
05/06/22	CMV	Lodging - Hyatt Regency (05/02/22 - 05/06/22)			\$	842.04
05/06/22	CMV	Per diem food allowance for (05/02/22 - 05/06/22)			\$	236.00
05/06/22	SBA	Rountrip Mileage reimbursement - Travel to/from Boca Raton to Jacksonville (616 miles x .585 = \$360.36)			\$	360.36
05/06/22	SBA	Parking reimbursement - Hyatt Regency			\$	58.67
05/06/22	SBA	Lodging - Hyatt Regency (05/02/22 - 05/06/22)			\$	927.14
05/06/22	SBA	Per diem food allowance for (05/02/22 - 05/06/22)			\$	236.00
05/06/22	SYT	Roundtrip Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = \$208.03)			\$	208.03
05/06/22	SYT	Lodging - Hyatt Regency (05/02/22 - 05/06/22)			\$	796.16
05/06/22	SYT	Per diem food allowance for (05/02/22 - 05/06/22)			\$	236.00



Re: Federal Trade Commission v Michael Rando Case No.: 3:22-cv-00487-TJC-MCR

For Professional Services Rendered May 1, 2022 through July 1, 2022

Initials	Description Hou		Rate		Amount
				¢	20.00
SYI	Parking reimbursement - Hyatt Regency			\$	20.00
SYT	Reimbursement for storage lock: Atlantic Self Storage re: new lock for Storage Unit			\$	19.34
SYT	Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03)			\$	208.03
SYT	Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03)			\$	208.03
	Copies (364 pages x.15 = \$54.60)			\$	54.60
	Copies (1,741 pages x.15 = \$261.15)			\$	261.15
	Total Expenses			\$	6,547.35
	Total Amount Due			\$	158,500.75
	SYT SYT SYT	 SYT Parking reimbursement - Hyatt Regency SYT Reimbursement for storage lock: Atlantic Self Storage re: new lock for Storage Unit SYT Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03) SYT Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03) Copies (364 pages x.15 = \$54.60) Copies (1,741 pages x.15 = \$261.15) Total Expenses 	 SYT Parking reimbursement - Hyatt Regency SYT Reimbursement for storage lock: Atlantic Self Storage re: new lock for Storage Unit SYT Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03) SYT Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03) Copies (364 pages x.15 = \$54.60) Copies (1,741 pages x.15 = \$261.15) Total Expenses	 SYT Parking reimbursement - Hyatt Regency SYT Reimbursement for storage lock: Atlantic Self Storage re: new lock for Storage Unit SYT Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03) SYT Mileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03) Copies (364 pages x.15 = \$54.60) Copies (1,741 pages x.15 = \$261.15) Total Expenses 	SYTParking reimbursement - Hyatt Regency\$SYTReimbursement for storage lock: Atlantic Self Storage re: new lock for Storage Unit\$SYTMileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03)\$SYTMileage reimbursement - Travel to/from Jacksonville (355.6 miles x .585 = 208.03)\$Copies (364 pages x.15 = \$54.60) Copies (1,741 pages x.15 = \$261.15)\$Total Expenses

Footnote:

¹In order to reduce the cost to the Receivership Estate, the Receiver requested the expenses for these professionals be limited to the mileage to and from the Firm's Miami office rather than the airfare and travel related expenses from the Firm's out of state offices.

Case 3:22-cv-00487-TJC-MCR Document 67-5 Filed 07/08/22 Page 1 of 4 PageID 1265

EXHIBIT 4





32815 US 19 North Suite 100 Palm Harbor, Florida 34684

Invoice for Services

www.ehounds.com (727) 726-8985

		ose Date Invoice # Balance Due Case Reference (E10137)	Term	าร	
05/	01/2022 05	/31/2022 34857 \$19421.00 FTC v. Rando		Due or	n Receipt
	2 S. Bis Suite 20	bociatesYIP Associatescayne TowerMaria Yipcayne Blvd.305-787-3750			
Q	Date Expedit	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1.5	05/09/2022	Expert Consult R Rohr call with M Yip/S Tai	RTR	\$350.00	\$525.00
1	05/09/2022	Intake/Collection/Preservation Dropbox (For CGU Assets)	JCS		\$250.00
1	05/09/2022	Intake/Collection/Preservation (Google Takeout) brockfcfm@gmail.com	JCS		\$250.00
1	05/09/2022	Intake/Collection/Preservation (Google Takeout) missedcallscgu2@gmail.com	JCS		\$250.00
.5	05/09/2022	Expert Review - Cloud Services Review and Secure Quickbooks Online and Update Creds/Owner to Receiver	RTR		\$175.00
2.8	05/10/2022	Project Management Create master database of all credentials	JCS		\$546.00
1	05/13/2022	Intake/Collection/Preservation E10137-1 HP 14" Laptop	ERC		\$250.00
1	05/13/2022	Intake/Collection/Preservation E10137-2 Asus ZenBook	ERC		\$250.00
1	05/13/2022	Intake/Collection/Preservation E10137-3 HP 17" Laptop	ERC		\$250.00
1	05/13/2022	Expert Services (on Call) Redirect of website to receivership page. Expedite.	RTR		\$350.00
3	05/13/2022	Intake/Collection/Preservation E10137-1, E10137-2, E10137-3	ERC		\$750.00
2.1	05/13/2022	Expert Review - Cloud Services E10137-7 CloudFunnel.com - Download Sales & Client Data / Secured Site / Archive			\$735.00
1	05/13/2022	Expert Review - Cloud Services E10137-8 Cloudflare - Account Secured, Audit Log Generated and Reviewed.	RTR		\$350.00
1	05/13/2022	Expert Review - Cloud Services E10137-9 Canva - Account Secured, Associated Accounts and Services located.	RTR		\$350.00
1	05/13/2022	Expert Review - Cloud Services E10137-11 Twitter (Magnet Axiom Aquire and Analysis. Account Secured	RTR		\$350.00
1	05/13/2022	Intake/Collection/Preservation E10137-9 Canva	JCS		\$250.00
1	05/14/2022	Expert Review - Cloud Services E10137-12 Vimeo, Account Secured, Reviewed all artifatcts.	RTR	\$350.00	\$350.00
6.6	05/16/2022	Expert Review Review Provided Credentials, Validate all and Make Recommendations on items that need secureing.	RTR	\$350.00	\$2310.00
2.75	05/17/2022	Expert conf call R Rohr / N Hill - Securing Accounts (Google, M365, GoDaddy)	RTR	\$350.00	\$962.50
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) jeremyfcfm@gmail.com	JCS	\$250.00	\$250.00
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) martha.digital.ptt@gmail.com	JCS	\$250.00	\$250.00
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) jen.creditgameu@gmail.com	JCS	\$250.00	\$250.00
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) 10xmoneymike@gmail.com	JCS	\$250.00	\$250.00
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) firstcoastfm@gmail.com	JCS	\$250.00	\$250.00
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) creditgamemike@gmail.com	JCS		\$250.00
1	05/17/2022	Intake/Collection/Preservation (Google Takeout) prosperitytrainingtechnology@gmail.com	JCS	\$250.00	\$250.00
14	05/17/2022	Intake/Collection/Preservation (Office 365) 14 Custodians - creditgameu.com - Email	ERC	\$250.00	\$3500.00
1	05/17/2022	Intake/Collection/Preservation (Office 365) mike@talkwithunclemike.com	JCS	\$250.00	\$250.00
1.2	05/17/2022	Expert Services Diagnose why creditgameu.com was no longer resolving to receivers site and re secure.	RTR	\$350.00	\$420.00
1	05/17/2022	Triage - Full Workup (USB/Int hist/del data/use profiling/data movement) E10137-1 (Jen's Laptop - HP 14")	JCS		\$1250.00
1	05/18/2022	Expert conf call R Rohr . B Welke FTC / S Chaudhry FTC / M Yip	RTR		\$350.00
.5	05/18/2022	Project Management Upload M365 emails (cGU) to FTC	RTR	\$195.00	\$97.50
.5	05/18/2022	Expert conf call R Rohr/S Tai/M Yip	RTR	\$350.00	\$175.00
1	05/19/2022	Triage - Full Workup (USB/Int hist/del data/use profiling/data movement) E10114-2 (Brock's Laptiop)	JCS	\$1250.00	\$1250.00
.6	05/19/2022	Expert conf call R Rohr / M Yip / K Donlan	RTR	\$350.00	\$210.00
.5	05/19/2022	Expert conf call R Rohr / N Hill (Secure Siteground/Discuss additional websites and email addresses)	RTR	\$350.00	\$175.00
1.4	05/19/2022	Expert Services Secure Siteground (val. 10x and mikesingles), update creds, update billing, Restore website, re-connection	ect RTR		\$490.00



Page 1 of 2

Invoice Page 2 of 2

Q Date	Date Expedited All quantities are based Hourly unless otherwise noted						Ext
05/01/2022	05/31/2022	34857	\$19421.00	FTC v. Rando		Due on Rece	
Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Term	S	

All balances are due upon receipt. Thank you!	SUBTOTAL	\$19421.00
Payments Applied		
	TOTAL	\$19421.00
	Balance Due	\$19421.00
	Retainer Amount Rem	aining
Please note: Our fees are subject to change annually. Last change: 1/2/2018	E-Hounds also accepts	

E-Hounds also accepts: In the liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above. All unpaid balances over 30 days will be subject to a 15% fee per month. Any unpaid balances over 60 days will be subject to a 15% fee per month. Any unpaid balances over 60 days will be subject to a services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice & CR Document 67-5 Filed 07/08/22 Berry Casel B. 22ice-004 Senvice-004 Senvi

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

	en Date 01/2022	Close Date 06/30/2022	Invoice # 35770	Balance Due \$10221.00	Case Re	ference (E10137)TFTC v. Rando	erms Di	ue on Rece	eipt
		Invoice to: YIP Associates One Biscayne Tower 2 S. Biscayne Blvd. Suite 2690 Miami, Florida 33131				Case Contact: YIP Associates Maria Yip 305-787-3750			
Q	Date	Expedited	All quantities	are based Hourly	unless ot	nerwise noted	Tech	Price	Ext
1	06/01/202	2 E-Hounds Revie	w Initial Setup					\$995.00	\$995.00
1	06/01/202	2 E-Hounds Revie	w Platform (incl 1 use	er seat) Myip@yipcpa.co	m			\$995.00	\$995.00
4.8	06/03/202	2 User Data Extra	ction User Data from	SEC Images			ERC	\$195.00	\$936.00
7	06/07/202	2 E-Hounds Revie	w Platform Access m	onthly cbailey@yipcpa.c	com cbrun@	vipcpa.com cvatti@yipcpa.com gmartell@yipc	cpa.	\$150.00	\$1050.00
2.5	06/07/202	2 Expert Review F	Expert Review Research on creditgameuniversity.com, elete-deletions.com, prosperitytrainingtechnology.com				RTR	\$350.00	\$875.00
3.25	06/08/202	2 Project Manager	ment Call Exports fror	n Ring Central - Varying	Days		JCS	\$195.00	\$633.75
4.5	06/09/202	2 Expert Report E	-Hounds Expert Repo	rt (June 9, 2022-R Rohr	.)		RTR	\$350.00	\$1575.00
.75	06/09/202	2 Report Generati	on Ring Central Call L	₋ogs Report			JCS	\$195.00	\$146.25
4.2	06/11/202	2 Expert Phone Sy	2 Expert Phone System Programming RingCentral - Reprogram phone system to call Maria Yip line.				RTR	\$350.00	\$1470.00
.5	06/11/202	2 Export and prod	Export and produce (Native) YouTube Video - "Super Boost your Credit Score"				RTR	\$195.00	\$97.50
1	06/13/202	2 Intake/Collection	Intake/Collection/Preservation (Google Takeout) brock.prosperitytrainingtech@gmail.com				JCS	\$250.00	\$250.00
3	06/14/202	2 Project Manager	ment - Data Load-in, I	ndexing, QC, OCR (7 e	mail native i	nports)	DAB	\$195.00	\$585.00
.75	06/15/202	2 Expert Phone Sy	ystem Programming L	Jndo Redirect to Receiv	er and Place	VM for main line directing to receivers websit	te RTR	\$350.00	\$262.50
1	06/21/202	2 Expert conf call	Expert conf call R Rohr/C Brun - Social Media Discussions, Google AdSense/YouTube Payouts structure and frequency				y RTR	\$350.00	\$350.00

All balances are due upon receipt. Thank you!	SUBTOTAL	\$10221.00
Payments Applied		
	TOTAL	\$10221.00
	Balance Due	\$10221.00
	Retainer Amount Remaini	ng
Please note: Our fees are subject to change annually. Last change: 2/1/2022	E-Hounds also accepts:	
Statement of Limited Liability and Financial Responsibility	Venmo: @ehounds	
E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use o misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continuer		om
storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON REFCEIPT, unles stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment for lengement inducation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds ir endered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.	st e s s s s s s s	
	venmo	PayPal