

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Case No. 3:22-cv-0487-TJC-MCR

MICHAEL RANDO, et al.,

Defendants.

**RECEIVER MARIA M. YIP'S RESPONSE TO DEFENDANTS'
SECOND MOTION TO MODIFY ASSET FREEZE
FOR PAYMENT OF ATTORNEY'S FEES [DOC 81]**

Receiver Maria M. Yip ("Receiver"), by and through her undersigned counsel, hereby responds to Defendants Michael and Valerie Rando's Motion to Modify the Asset Freeze to Permit the Payment of Attorney's Fees. As stated in the motion, the Receiver does not object to the amount of the fees sought but believes that the fees should be paid from the Randos' personal accounts, not accounts held by the Receiver. Previous payments for attorney's fees and living expenses have been paid from the Randos' Fifth Third account ending in XXXXX1169. However, the account balance in this account will not cover the fees requested.

The Randos have multiple investment accounts held at Cardone Capital. These accounts make monthly distributions. Prior to this case being filed, these distributions were paid directly to the Randos. However, since the Asset Freeze was entered, Cardone Capital has held these distributions.

The Receiver requests that the Court modify the Asset Freeze and allow Cardone Capital to direct all accrued and future distributions to the Randos' Fifth Third account ending in XXXXX1169. The Receiver further requests that the Court then allow the fees sought in the motion at issue to be paid from the Fifth Third account ending in XXXXX1169.

Respectfully submitted,

/s/ Katherine C. Donlon
Katherine C. Donlon
Florida Bar No. 0066941
kdonlon@jclaw.com
**JOHNSON, CASSIDY,
NEWLON & DECORT, P.A.**
2802 N. Howard Avenue
Tampa, Florida 33607
Telephone: (813) 699-4859
Facsimile: (813) 235-0462

Attorneys for Receiver Maria M. Yip

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 30, 2022, a true and correct copy of the foregoing was electronically filed by using the CM/ECF System, which will serve a copy on all counsel of record.

/s/ Katherine C. Donlon
Attorney