

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 SECOND 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) pursuant to the

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.

Court's Order dated May 3, 2020 (Doc. 12) (the "TRO"), respectfully submits this Second 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 July 2, 2022 through August 31, 2022. Pursuant to the Court's request at the Status Conference held on September 21, 2022, the Receiver requests approval of the payment of the following fees:

I. The Receiver.

The Receiver requests the Court award her fees for the professional services rendered and costs incurred from July 2, 2022 through August 31, 2022, in the amount of \$11,878.75 and \$733.28, respectively. Additionally, the Receiver advanced Operation Costs for the Receivership Entities in the amount of \$24,760.84. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as Exhibit 1. The Receiver's time and fees for services rendered for activity from July 2, 2022 through August 31, 2022, are 31.4 hours at \$325/hour and 10.3 hours at \$163/hour for travel time for a total of \$11,878.755.

Receiver's Time and Fees for Services Rendered

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Maria M. Yip (MMY)	Receiver	30	31.4	\$325	\$10,205.00
Maria M. Yip (MMY)	Receiver	30	10.3	163	\$1,673.75
Fees					\$11,878.75
Disbursements					\$733.28
Total					\$12,612.03

In addition to her professional fees, the Receiver had costs of \$733.28 as summarized below:

Costs	Total
Travel	\$612.78
Website	\$120.50
Total	\$733.28

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 Exhibit 2 and total \$24,760.84.

II. Johnson Cassidy Newlon & DeCort ("JCND").

The Receiver requests the Court award JCND fees for professional services rendered and costs incurred from July 2, 2022 through August 31, 2022, in the amounts of \$19,008.00 and \$161.38, respectively. A copy of the statements summarizing the services rendered and costs incurred by JCND from July 2, 2022 through August 31, 2022, is attached as Exhibit 3. JCND's

time and fees for services rendered on this matter for each professional are as follows:

JCND's Time and Fees for Services Rendered

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Katherine Donlon (KCD)	Partner	27	52.8	\$360.00	\$19,008.00
Fees					\$19,008.00
Disbursements					\$161.38
Total					\$19,169.38

In addition to legal fees, JCND has advanced costs of \$161.38 as summarized below.

Costs	Total
Transcript	\$67.50
Overnight Services	\$93.88
Total	\$161.38

III. Yip Associates.

The Receiver requests the Court award Yip Associates fees for professional services rendered and costs incurred from July 2, 2022 through August 31, 2022, in the amount of \$24,084.50 and \$1,303.92, respectively. Travel time was billed at 50% discount. Copies of the statement summarizing the services rendered and costs incurred for the pertinent period are attached as composite Exhibit 4. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

Yip Associates Time and Fees for Services Rendered

Professional	Position	Yrs. Exp.	Hours	Rate	Total
Cristal A. Brun (CB)	Lead Forensic Accountant	20	23.4	\$295.00	\$6,903.00
Shawna Amarnani (SBA)	Lead Forensic Accountant	11	22.5	\$295.00	\$6,637.50
Danny Zamorano (DDZ)	Lead Forensic Accountant	6	9.2	\$295.00	\$2,714.00
Susan Y. Tai (SYT)	Senior Forensic Accountant	8	16.0	\$225.00	\$3,600.00
Susan Y. Tai (SYT)	Senior Forensic Accountant	8	17.2	\$112.50	\$1,935.00
Charles D. Bailey (CDB)	Senior Forensic Accountant	6	8.1	\$225.00	\$1,822.50
Christopher M. Vatti (CMV)	Senior Forensic Accountant	6	2.1	\$225.00	\$472.50
Fees					\$24,084.50
Disbursements					\$1,303.92
Total					\$25,388.42

In addition to professional fees, Yip Associates had costs of \$1,303.92 as summarized below:

Costs	Total
Travel	\$827.37
Copies	\$236.55
Moving Expenses	\$240.00
Total	\$1,303.92

IV. E-Hounds, Inc.

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from July 2, 2022 through August 31, 2022, in the amount of \$5,257.50. Copies of the statements summarizing the services rendered for the pertinent period are attached as composite Exhibit 5. A summary of the professionals' hours rendered during the time covered by this Application is set forth below.

E-Hounds' Time and Fees for Services Rendered

Professional	Position	Hours	Rate	Total
Robert Rohr (RTR)	Senior Analyst	2.5	\$350.00	\$875.00
Robert Rohr (RTR)	Project Management	1.0	\$195.00	\$195.00
Ernesto Rojas (ERC)	Technician	0.5	\$195.00	\$97.50
Fees				\$1,167.50
Platform Charges				\$4,090.00
Total				\$5,257.50

V. Deferral of Fees from Receiver's First Motion for Fees and Costs.

On August 25, 2022, the Court entered an Order Granting in Part and Deferring in Part the Receiver's First Motion for Fees. [Doc. 83] This Order approved the payment of two-thirds of the submitted fees, costs and advanced expenses. The Court deferred consideration of the remaining one-third of the request pending the previously scheduled evidentiary hearing.

	Requested	Approved	Deferred
Receiver	\$63,735.18	\$42,490.12	\$21,245.06
JCND	\$62,200.42	\$41,466.95	\$20,733.47
Yip Associates	\$158,500.75	\$105,667.17	\$52,833.58
E-Hounds	\$29,642.00	\$19,761.33	\$9,880.67
Total	\$314,078.35	\$209,385.57	\$104,692.78

Based on the anticipated settlement, entry of the preliminary injunction, and winding down of the Receivership Estate, the Receiver respectfully requests that the Court approve the remaining one-third of the costs previously deferred by the Court.

VI. Funding of Receivership Fees, Defendants' Attorney's Fees and Living Expenses

In anticipation of the Court's order approving some amount of fees to be paid to the Receiver and her professionals, as well as counsel for the Defendants and living expenses for the Randos, the Receiver requests that the Court's Order specifically modifies the Asset Freeze to require Fifth Third to close all related accounts that it has frozen and send the proceeds of those accounts to the Receiver. Similarly, the Receiver requests that the Court's Order also modifies the Asset Freeze and directs Cardone Capital to pay all accrued and future distributions to the Receiver. Should the Court, based on the arguments of the FTC, determine that the Randos' living expenses be paid from the Randos' accrued distributions from their Retail E-Commerce Ventures, LLC, the Receiver would request that that modification to the Asset Freeze be noted in the Court's Order.

CONCLUSION

Under the TRO, the Receiver, among other things, is authorized and empowered to engage professionals to assist her in carrying out her duties 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. A summary of those fees, costs and advanced expenses, as well as those fees previously deferred by the Court, is set forth below.

	July 2, 2022-August 31, 2022			Deferred from First Motion for Fees and Costs	Total
	<i>Fees</i>	<i>Costs</i>	<i>Total</i>		
Receiver	\$11,878.75	\$733.28	\$12,612.03	\$21,245.06	\$33,857.09
Receiver - Operational Expenses		\$24,760.84	\$24,760.84		\$24,760.84
Yip Associates	\$24,084.50	\$1,303.92	\$25,388.42	\$52,833.58	\$78,222.00
Johnson Cassidy Newlon & DeCort	\$19,008.00	\$161.38	\$19,169.38	\$20,733.47	\$39,902.85
E-Hounds	\$5,257.50		\$5,257.50	\$9,880.67	\$15,138.17
Total	\$60,228.75	\$26,959.42	\$87,188.17	\$104,692.78	\$191,880.95

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	\$58,617.93
Yip Associates	\$78,222.00
Johnson, Cassidy, Newlon & DeCort	\$39,902.85
E-Hounds, Inc.	\$15,138.17

LOCAL RULE 3.01(g) CERTIFICATION

Undersigned counsel for the Receiver has conferred with counsel for the FTC and Defendants. The FTC agrees with the relief sought and the Defendants do not agree with the relief sought.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 23, 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.

/s/ Katherine C. Donlon

Katherine C. Donlon, FBN 0066941

kdonlon@jclaw.com

JOHNSON, CASSIDY, NEWLON &
DECORT P.A.

2802 N. Howard Avenue

Tampa, FL 33607

Tel: (813) 291-3300

Fax: (813) 324-4629

Attorneys for Receiver Maria M. Yip

RECEIVER'S CERTIFICATION

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.

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.

s/Maria M. Yip
Maria M. Yip, as Receiver

EXHIBIT 1



INVOICE SUMMARY OF MARIA M. YIP, RECEIVER
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Maria M. Yip, Receiver
 2 South Biscayne Boulevard
 Suite 2690
 Miami, Florida 33131

Invoice Number: 31564
 Date: September 20, 2022

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

Professional	Initials	Position	Experience	Hours	Rate	Fees
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Partner	30 Years	31.4	\$325	\$ 10,205.00
Maria M. Yip, CPA, CFE, CFF, CIRA ¹	MMY	Partner	30 Years	10.3	\$163	\$ 1,673.75
Total Fees:				<u><u>41.7</u></u>		<u><u>\$ 11,878.75</u></u>
Total Expenses:						<u><u>\$ 733.28</u></u>
Total Fees and Expenses						<u><u>\$ 12,612.03</u></u>

Note:

¹Travel time has been charged at 50% of the discounted billing rate.



Invoice Number: 31564

INVOICE DETAIL MARIA M. YIP, RECEIVER
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Maria M. Yip, Receiver
 2 South Biscayne Boulevard
 Suite 2690
 Miami, Florida 33131

Invoice Number: 31564
 Date: September 20, 2022

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

Date	Initials	Description	Hours	Rate	Amount
07/05/22	MMY	Call with Leslie Perez at Axos Bank to set up account (.7); discussion with C. Brun re: Ring Central (.1); communication with B. Welke re: access for review (.2); discussion with C. Brun re: invoices to be filed with the Court; outstanding invoices; incoming mail including chargebacks; new bank account and website (.6); reviewed and signed documents in connection with opening bank account including discussions with L. Perez (1.6).	3.2	\$325	\$ 1,040.00
07/06/22	MMY	Reviewed expenses that have been requested (.4); discussion with S. Amarnani and C. Brun re: expenses due on behalf of the Estate (.3).	0.7	\$325	\$ 227.50
07/07/22	MMY	Reviewed bills to pay, email communications re: funds from Truist; payments to Gunster and Mr. and Mrs. Rando; emails re: proposed dates for	0.5	\$325	\$ 162.50
07/08/22	MMY	Discussion with C. Brun re: pending items (.1); conference call with B. Welke, N. Hill, K. Donlon, J. Burns and J. Coleman (.3).	0.4	\$325	\$ 130.00



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For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/22	MMY	Telephone conference with K. Donlon and C. Brun re: motion and personal expenses to send to defendants (.3); meeting with K. Donlon re: defendant's personal expenses and other items to contact vendor (.8).	1.1	\$325	\$ 357.50
07/12/22	MMY	Meeting with K. Donlon re: defendants' personal expenses and other items to contact vendor (.8); communications with landlord (.1).	0.9	\$325	\$ 292.50
07/14/22	MMY	Telephone conversations with K. Donlon re: lease of office space (.5) and conference call with D. Rosenthal re: same (.3).	0.8	\$325	\$ 260.00
07/18/22	MMY	Communications with K. Donlon re: report (.1); reviewed assignment of lease draft and communication with K. Donlon re: same (.2).	0.3	\$325	\$ 97.50
07/19/22	MMY	Conference call with K. Donlon re: assignment.	0.2	\$325	\$ 65.00
07/20/22	MMY	Reviewed motion for clarification of the funds for personal expenses and communications with K. Donlon re: same (.2); several discussions with C. Brun re: turnover of office space (.4).	0.6	\$325	\$ 195.00
07/21/22	MMY	Communications with K. Donlon re: response to State of Florida and review of same.	0.2	\$325	\$ 65.00
07/22/22	MMY	Preparation for and conference call with K. Donlon, H. Park and B. Welke re: Elite Deletions and Resource Management (.9); discussion with D. Zamorano re: schedules on flow of funds for same (.2).	1.1	\$325	\$ 357.50



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For Professional Services Rendered July 2, 2022 through August 31, 2022

Date	Initials	Description	Hours	Rate	Amount
07/25/22	MMY	Discussion with C. Brun re: turnover of office space (.3); reviewed executed of assignment of lease (.3); discussion with R. Rohr re: removal of equipment (.2); reviewed motion in opposition to fees and discussion with K. Donlon re: response to same, assignment and turnover of space (.6).	1.4	\$325	\$ 455.00
07/26/22	MMY	Discussions with C. Brun and S. Tai re: finalizing the turnover of the offices.	0.4	\$325	\$ 130.00
07/27/22	MMY	Telephone conversations with K. Donlon and S. Tai re: turnover of Jacksonville office (.3); telephone conference with K. Donlon re: status and fee request (.5); discussion with C. Brun and P. Chuy re: transition of utilities (.4); communication with K. Donlon re: assignment and sending of assignment with wet signature to D. Rosenthal; requests from Mr. John. Rando re: utilities (.2).	1.4	\$325	\$ 455.00
07/28/22	MMY	Travel to Jacksonville for turnover of property. [Billed at 50% of the discounted hourly billing	5.1	\$163	\$ 828.75
07/29/22	MMY	Final removal of corporate defendants' books and records and computer equipment for turnover of office space; execution of agreement and turnover of personal property to employees.	6.9	\$325	\$ 2,242.50
07/29/22	MMY	Travel from Jacksonville to Miami [Billed at 50% of the discounted hourly billing rate.]	5.2	\$163	\$ 845.00



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For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/04/22	MMY	Telephone conversation with K. Donlon re: storage, transitioning space, follow-up with counsel for defendants; transfer from Fifth Third (.5); discussion with S. Tai re: removal of items from personal defendant storage unit (.5); communications with K. Donlon re: transition to Mr. and Mrs. Rando; review of draft	1.2	\$325	\$ 390.00
08/08/22	MMY	Communications with K. Donlon re: defendant personal bank account.	0.1	\$325	\$ 32.50
08/10/22	MMY	Conference call with K. Donlon, H. Park and B. Welke re: assignment of lease, potential discussions with defendants and preparation for PI hearing (1.0); discussion with S. Tai re: monthly expenses (.1).	1.1	\$325	\$ 357.50
08/15/22	MMY	Conference call with B. Welke, H. Park and K. Donlon re: status (.6); telephone conversation with K. Donlon re: meeting with defendants' counsel (.2); reviewed and made revisions to reply in support of receiver's fee application (.8); discussion with S. Tai re: documents in storage (.3).	1.9	\$325	\$ 617.50
08/16/22	MMY	Telephone conversation with K. Donlon re: YouTube video with M. Rando.	0.2	\$325	\$ 65.00
08/24/22	MMY	Conference call with K. Donlon, H. Park and B. Welke re: PI hearing (1.0); calls to dealers re: Lamborghini (.5).	1.5	\$325	\$ 487.50
08/25/22	MMY	Conference call with K. Donlon, H. Park and B. Welke re: pending items (1.3); call with Kajabi (.3).	1.6	\$325	\$ 520.00



Invoice Number: 31564

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

Date	Initials	Description	Hours	Rate	Amount
08/26/22	MMY	Conference call with K. Donlon and B. Welke re: proposed stipulation (.2); reviewed and email correspondence to K. Donlon, B. Welke and H. Park re: wholesale tradelines (.2); discussion with S. Tai re: wholesale tradeline records in storage (.4); discussion with S. Amarnani re: bank matrix and automobiles (.1).	0.9	\$325	\$ 292.50
08/29/22	MMY	Conference call with K. Donlon, M. Freed, N. Hill and M. Rando re: resolution (.7); telephone conversation with K. Donlon re: proposed terms (.4); reviewed stipulated preliminary injunction and motion (.5); telephone conversation with customer re: credit repair not provided. (.2).	1.8	\$325	\$ 585.00
08/30/22	MMY	Telephone conversation with K. Donlon re: proposed stipulated injunction (.4); follow-up call on items for the preliminary injunction and requests from M. Freed (.5).	0.9	\$325	\$ 292.50
08/31/22	MMY	Provided wire transfer information to K. Donlon for payment by J. Rando.	0.1	\$325	\$ 32.50
Total Fees			41.7		\$ 11,878.75
7/28/2022	MMY	Mileage Reimbursement: from Miami to Jacksonville (350 miles x .585 = \$204.75)			\$ 204.75
7/28/2022	MMY	Reimbursement for Lodging at Residence Inn Jacksonville			\$ 203.28
7/29/2022	MMY	Mileage Reimbursement: from Jacksonville to Miami (350 miles x .585 = \$204.75)			\$ 204.75



Invoice Number: 31564

Re: Federal Trade Commission v Michael Rando
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For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/22		K.Tek Systems (Website services) - site update for upload of court filings			\$ 37.50
08/01/22		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
Total Expenses					<u>\$ 733.28</u>
Total Amount Due					<u><u>\$ 12,612.03</u></u>

EXHIBIT 2



**DETAIL FOR RECEIVER'S OUT-OF-POCKET BUSINESS
EXPENSES OF CORPORATE DEFENDANTS
INCURRED FOR THE PERIOD JULY 2, 2022 THROUGH AUGUST 31, 2022**

Maria M. Yip, Receiver
2 South Biscayne Boulevard
Suite 2690
Miami, Florida 33131

Invoice Number: 31570
Date: 9/20/2022
Matter ID: 172.0003

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

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/06/22	American Express x11005 for Financial Consulting Management Group LLC / Michael S. Rando - Stmt Closing 06/17/22	\$ 35.00
07/06/22	American Express x71002 for Prosperity Training Technology LLC /Michael Rando - Stmt Closing 06/08/22	\$ 1,824.39
07/06/22	Hartford Insurance	\$ 896.50
07/06/22	American Express x82008 for Michael S Rando - Stmt Closing 05/16/22	\$ 40.00
07/06/22	FNBO - First National Bank of Omaha x23713 for Prosperity Training Technology LLC - Stmt Closing 05/06/22	\$ 281.58
07/06/22	Mercedes-Benz Financial Services x39001 - Stmt Closing 06/16/22	\$ 746.95
07/06/22	RingCentral MVP Premium x07772	\$ 1,634.07
07/06/22	The UPS Store	\$ 18.39



Invoice Number: 31244
Matter ID: 172.0003

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

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/07/22	Navy Federal Credit Union x1952 for First Coast Matchmakers	\$ 421.50
07/07/22	Navy Federal Credit Union LOC x8277 for First Coast Matchmakers	\$ 467.36
07/07/22	ZOOM INV152898267 x3247	\$ 104.99
07/07/22	Comcast x2930	\$ 852.27
07/07/22	Comcast x3003	\$ 607.48
07/08/22	The UPS Store	\$ 16.20
07/11/22	Richmond North - Pitney Bowes Meter	\$ 136.26
07/11/22	Chargebacks911 Invoice 170540 May 2022	\$ 2,500.00
07/14/22	Siteground Hosting	\$ 29.99
07/14/22	The UPS Store	\$ 18.39
07/14/22	Authorize.Net	\$ 57.00
07/15/22	The UPS Store	\$ 16.20
07/15/22	VA Leasing Corporation x2100-168 Stmt 07/07/22	\$ 4,567.83
07/15/22	SafeTouch Jacksonville Division July 2022.	\$ 87.78
07/15/22	Hiscox Insurance Company - Policy UDC-2392103-CGL	\$ 85.45



Invoice Number: 31244
Matter ID: 172.0003

Re: Federal Trade Commission v Michael Rando
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<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/18/22	Capital on Tap - "New Wave Card Inc dba Capital on Tap" for Prosperity Training Technology LLC	\$ 2,029.08
07/19/22	Hiscox Insurance Company - Policy UDC-2392103-CGL	\$ 44.16
07/21/22	The UPS Store	\$ 18.39
07/22/22	Navy Federal Credit Union x1952 for First Coast Matchmakers	\$ 1,275.50
07/22/22	Navy Federal Credit Union LOC x8277 for First Coast Matchmakers	\$ 174.12
07/22/22	The UPS Store	\$ 16.74
07/22/22	INTUIT QUICKBOOKS - Software License/User Access	\$ 80.00
07/26/22	Atlantic Self Storage	\$ 406.92
07/27/22	American Express x71002 for Prosperity Training Technology LLC /Michael Rando - Stmt Closing 07/08/22	\$ 134.00
07/27/22	FNBO - First National Bank of Omaha x23713 for Prosperity Training Technology LLC - Stmt Closing 07/07/22	\$ 276.76
07/27/22	Comcast x3003	\$ 624.72
07/27/22	Comcast x2930	\$ 517.25
07/28/22	The UPS Store	\$ 18.49



Invoice Number: 31244
Matter ID: 172.0003

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/29/22	The UPS Store	\$ 16.20
07/29/22	CALLRAIL.COM	\$ 212.50
07/29/22	Siteground Hosting	\$ (90.00)
07/31/22	Reimbursement for The UPS Store	\$ 24.84
08/01/22	GoDaddy Email (creditgameu.com)	\$ 119.76
08/02/22	RingCentral MVP Premium x07772	\$ 1,627.55
08/03/22	GoDaddy Email (creditgameu.com)	\$ 30.16
08/04/22	Atlantic Self Storage	\$ 1,163.15
08/04/22	The UPS Store	\$ 18.49
08/05/22	The UPS Store	\$ 18.29
08/11/22	American Express x11005 for Financial Consulting Management Group LLC / Michael S. Rando - Stmt Closing 07/17/22	\$ 20.00
08/12/22	The UPS Store	\$ 18.49
08/12/22	The UPS Store	\$ 19.80
08/14/22	Siteground Hosting	\$ 29.99
08/16/22	Authorize.Net	\$ 52.58
08/18/22	The UPS Store	\$ 18.49



Invoice Number: 31244
Matter ID: 172.0003

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Case No.: 3:22-cv-00487-TJC-MCR

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/19/22	Hiscox Insurance Company - Policy UDC-2392103-CGL	\$ 44.16
08/19/22	The UPS Store	\$ 18.89
08/22/22	INTUIT QUICKBOOKS - Software License/User Access	\$ 85.00
08/25/22	The UPS Store	\$ 18.49
08/29/22	The UPS Store	\$ 19.80
08/29/22	CALLRAIL.COM	\$ 212.50
Total Amount Due		\$ 24,760.84

EXHIBIT 3

**INVOICE**

Date: 09/07/2022

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**

Date	Attorney	Description	Quantity	Rate	Total
08/01/2022	KD	Draft response to former employees seeking back wages (.3); confer with Receiver regarding same (.1).	0.40	\$360.00	\$144.00
08/01/2022	KD	Emails with D. Rosenthal regarding assignment of lease (.1); review Court's Order allowing for transfer of funds from Fifth Third to Receiver (.1); emails with Receiver regarding same (.1).	0.30	\$360.00	\$108.00
08/02/2022	KD	Emails with N. Hill regarding Randos' personal bills and status of leased BMW (.2); emails with N. Hill and B. Welke regarding payment of attorney fees and living expenses (.1)	0.30	\$360.00	\$108.00
08/02/2022	KD	Emails with J. Rando regarding assignment of lease (.1); review FTC's opposition to defendants' motion for living expenses (.2).	0.30	\$360.00	\$108.00
08/04/2022	KD	Conference call with Receiver regarding outstanding issues (.5); email with E. Gallagher, Fifth Third, regarding transfer of funds to Receiver (.2); email to N. Hill regarding modification of asset freeze as it relates to Cardone and REI (.2); email to D. Rosenthal regarding assignment of lease (.1); emails with J. Rando regarding outstanding issues (.1); draft subpoena to Dr. Steve's Caffeine Melts (.6); emails with Receiver re same (.1); emails with N. Hill and Receiver regarding storage unit (.3); telephone call to American Integrity regarding check payable to D. Goldman (.2);	2.50	\$360.00	\$900.00

		emails to D. Goldman and M. Freed regarding same (.1); confer with Receiver regarding same (.1)			
08/08/2022	KD	Telephone call with N. Hill regarding fees motion and motion regarding funding attorneys' fees and living expenses (.2); emails with Receiver regarding Fifth Third account (.3); email to N. Hill regarding same (.1); email from D. Rosenthal regarding update on assignment of lease (.1).	0.70	\$360.00	\$252.00
08/09/2022	KD	Emails with N. Hill and Receiver regarding Fifth Third account and Rando properties up for auction (.4); emails with M. Freed and Receiver regarding Kensington property auction (.1).	0.50	\$360.00	\$180.00
08/10/2022	KD	Conference call with Receiver, B. Welke and H. Park (1.0)	1.00	\$360.00	\$360.00
08/11/2022	KD	Emails and telephone call with N. Hill regarding defendants' motion for fees, Rando credit cards, Credit Control (.4); receipt of fully executed assignment from landlord (.1); emails with Receiver regarding Rando credit card payments (.1); review personal Rando mail received by Receiver (.1).	0.70	\$360.00	\$252.00
08/12/2022	KD	Draft reply in support of motion for fees (5.2); emails with N. Hill regarding Rando living expenses and personal mail received by Receiver (.3).	5.50	\$360.00	\$1,980.00
08/12/2022	KD	Review Court's Order on Rando living expense (.1); emails with N. Hill regarding same (.2).	0.30	\$360.00	\$108.00
08/14/2022	KD	Continue drafting reply in support of motion for fees.	1.10	\$360.00	\$396.00
08/15/2022	KD	Conference call with B. Welke, H. Park and Receiver regarding status update (.6); confer with Receiver regarding reply in support of motion for fees (.5); revise and finalize same (.6).	1.70	\$360.00	\$612.00
08/15/2022	KD	Review Defendants' Second Motion to Modify Asset Freeze to Pay Attorney's Fees (.2); letter to C. Bannan, Cardone Capital, requesting documents and information (.3).	0.50	\$360.00	\$180.00
08/16/2022	KD	Send Dropbox link to C. Bannan, Cardone Capital (.1).	0.10	\$360.00	\$36.00
08/19/2022	KD	Emails with J. Robbins, outside counsel for Cardone Capital (.1).	0.10	\$360.00	\$36.00
08/22/2022	KD	Emails with M. Freed regarding status call (.1); review E-Hounds platform regarding Kajabi information (.3); email to Kajabi legal (.1); confer with Receiver regarding hearing preparation (.2).	0.70	\$360.00	\$252.00
08/23/2022	KD	Emails with Kajabi (.3); draft comprehensive request and formal letter to Kajabi (.4); review EHounds platform regarding same (.5); conference call with J. Robbins and N. Zoumberakis regarding information	1.80	\$360.00	\$648.00

		from Cardone Capital (.4); emails with N. Hill and Receiver regarding payment of invoices (.2).			
08/24/2022	KD	Conference call with B. Welke, H. Park, and Receiver regarding potential settlement (1.0)	1.00	\$360.00	\$360.00
08/24/2022	KD	Receipt and review of FTC's request to Kajabi (.1); emails with Receiver regarding vehicles and estimated mileage (.1); emails with N. Hill regarding same (.1).	0.30	\$360.00	\$108.00
08/25/2022	KD	Conference call with B. Welke, H. Park and Receiver regarding potential settlement (1.3); conference call with H. Park, Receiver and representatives of Kajabi (.3); emails regarding payoff on Lamborghini (.1).	1.70	\$360.00	\$612.00
08/26/2022	KD	Follow up email to B. Courtney, Navy Federal (.1); letter to Zelle requesting documents (.3); letter to Chase requesting documents (.3); conference call with Receiver and B. Welke regarding sales data and preliminary injunction (.4); review Credit Control letter from N. Hill (.1); initial review of email from B. Welke regarding proposed preliminary injunction (.3).	1.50	\$360.00	\$540.00
08/29/2022	KD	Conference call with M. Freed, N. Hill, M. Rando, and Receiver regarding outstanding issues (.4); emails with B. Welke regarding proposed preliminary injunction and potential request for status conference (.1); initial review of draft motion for fees from ECS and RMI (.2); emails with Receiver regarding same (.2).	0.90	\$360.00	\$324.00
08/30/2022	KD	Draft Response to Defendants' Second Motion for Fees (.6); communicate with Receiver regarding preliminary injunction motion and order (.4); telephone call with B. Welke regarding preliminary injunction motion (.2); conference call with B. Welke and J. Burns regarding motion for fees (.3); telephone call with M. Freed regarding settlement negotiations (.2); communicate with Receiver regarding same (.4).	2.10	\$360.00	\$756.00
08/31/2022	KD	Telephone call and emails with B. Welke regarding EZ Texting account (.2); emails with Receiver regarding same (.2)	0.40	\$360.00	\$144.00
				Quantity Subtotal	26.4
				Services Subtotal	\$9,504.00

Expenses

Date	Type	Attorney	Description	Total
08/29/2022	Expense	MBP	Overnight mail to Jennifer Cerio on 7/11/22.	\$93.88
Expenses Subtotal				\$93.88

Time Keeper	Quantity	Rate	Total
Katherine Donlon	26.4	\$360.00	\$9,504.00
Quantity Total			26.4
Subtotal			\$9,597.88
Total			\$9,597.88

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
5988	07/07/2022	\$62,200.42	\$41,466.95	\$20,733.47
6240	09/07/2022	\$9,571.50	\$0.00	\$9,571.50

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6230	09/07/2022	\$9,597.88	\$0.00	\$9,597.88
Outstanding Balance				\$39,902.85
Total Amount Outstanding				\$39,902.85

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

Payment is due upon receipt.

**INVOICE**

Invoice # 6240
Date: 09/07/2022

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**

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	07/06/2022	Emails with M. Freed regarding Receiver payment to Randos and payment of operational expenses (.2); confer with Receiver regarding same (.2); follow up with Truist regarding check (.1).	KD	0.50	\$360.00	\$180.00
Service	07/07/2022	Telephone call with Truist regarding transfer (.2); communicate with Receiver regarding same (.2); emails with M. Freed regarding payments to Gunster and Randos (.2); emails with Receiver regarding insurance renewal (.2).	KD	0.80	\$360.00	\$288.00
Service	07/07/2022	Emails with C. Brun and Receiver regarding insurance notices (.2); emails with counsel regarding evidentiary hearing dates (.1).	KD	0.30	\$360.00	\$108.00
Service	07/08/2022	Conference call with counsel to discuss dates for evidentiary hearing.	KD	0.30	\$360.00	\$108.00
Service	07/11/2022	Confer with Receiver regarding outstanding issues (.1); conference call with Receiver and C. Brun regarding expense questions (1.1); email to N. Hill regarding expense questions (.1); follow up with M. Freed and J. Burns regarding 3.01 conference on motion for attorney's fees (.2) [NO CHARGE]; review credit cards received	KD	1.70	\$360.00	\$612.00

		through mail (.2); emails with C. Brun regarding same (.2).				
Service	07/12/2022	Confer with J. Burns and M. Freed regarding Receiver's motion for fees (.3) [NO CHARGE]; draft Notice of Filing regarding same (.2); emails with M. Freed regarding business proposal (.1); confer with Receiver regarding same (.3).	KD	0.60	\$360.00	\$216.00
Service	07/12/2022	Review FTC's Open Settlement Memo (.5); emails with Receiver and D. Rosenthal, management company for office premises (.2).	KD	0.70	\$360.00	\$252.00
Service	07/13/2022	Emails with M. Freed regarding leased premises (.3); draft detailed email to N. Hill regarding mail/bills received by Receiver (.8); confer with C. Brun regarding Paycor and Covington (.3); left message for D. Goldman (.1); research Chargebacks911 and Electronic Commerce issue (.2); confer with Receiver regarding same (.1).	KD	1.80	\$360.00	\$648.00
Service	07/14/2022	Conference call with Receiver and D. Rosenthal regarding office lease (.5); review lease (.3); communicate with B. Welke regarding defendants' request (.2); confer with Receiver regarding response to defendants' request (.2); emails with M. Freed regarding request (.2); conference call with M. Freed, H. Park and B. Welke regarding potential assignment of lease (.3); confer with Receiver regarding same (.1); telephone calls and email to J. Rando regarding same (.4); telephone call with former employee LW (.4); telephone calls to consumers (DW, RR, CC) (.3); return call to D. Goldman's office (.1);	KD	3.00	\$360.00	\$1,080.00
Service	07/15/2022	Emails with N. Hill and C. Brun regarding outstanding bills (.3); telephone calls with C. Brun regarding same (.3); review form assignment and guaranty, identifying issues (.3); confer with Receiver regarding same (.3); emails with J. Rando regarding office furniture and equipment, assignment and related issues (.2); emails with D. Rosenthal regarding form assignment (.3).	KD	1.70	\$360.00	\$612.00
Service	07/15/2022	Review Court's order regarding evidentiary hearing (.1).	KD	0.10	\$360.00	\$36.00
Service	07/18/2022	Revise form Assignment of Lease (.3); confer with Receiver regarding same (.1); email to J. Rando enclosing same (.2).	KD	0.60	\$360.00	\$216.00

Service	07/19/2022	Emails with J. Rando regarding lease assignment, rent consideration, and purchase of furniture (.4); confer with Receiver regarding same (.2); emails with D. Goldman regarding asset freeze (.2); communicate with B. Welke regarding D. Goldman (.3); draft response to Florida Department of Agriculture regarding Walker complaint (.8); confer with Receiver regarding same (.1); continue drafting motion to modify asset freeze to reimburse Receivership (.9).	KD	2.90	\$360.00	\$1,044.00
Service	07/20/2022	Confer with Receiver regarding motion to modify asset freeze (.2); revise motion (.2); emails with counsel for 3.01 conferral (.2); emails with J. Rando and D. Rosenthal regarding Assignment of Lease (.3).	KD	0.90	\$360.00	\$324.00
Service	07/21/2022	Emails with J. Rando regarding Lease Assignment (.2); confer with Receiver regarding same (.1); communicate with B. Welke regarding settlement conference (.1).	KD	0.40	\$360.00	\$144.00
Service	07/21/2022	Finalize and send response to Florida Department of Agriculture (.1); emails with D. Goldman (.2).	KD	0.30	\$360.00	\$108.00
Service	07/22/2022	Emails with N. Hill regarding Mercedes (.1); conference call with Receiver, H. Park and B. Welke regarding potential claims for Elite Customer Services and Resource (.7); emails with same regarding account analysis (.2).	KD	1.00	\$360.00	\$360.00
Service	07/23/2022	Review Defendants' Opposition to Receiver's Motion for Fees.	KD	0.30	\$360.00	\$108.00
Service	07/25/2022	Receipt and review of Florida Department of Agriculture's response to Walker complaint (.1); forward same to Receiver (.1); telephone call with consumer ST (.2); emails with J. Rando regarding New Business Activity (.2); emails with landlord regarding assignment of lease (.1); confer with Receiver regarding outstanding issues (.4).	KD	1.10	\$360.00	\$396.00
Service	07/25/2022	Emails with M. Freed regarding American Integrity check (.1).	KD	0.10	\$360.00	\$36.00
Service	07/26/2022	Emails with N. Hill regarding request for fees (.2); emails with N. Hill regarding Rando personal bills received by Receiver (.1); begin drafting motion for leave to file reply in support of motion for fees (.3);	KD	1.10	\$360.00	\$396.00

		begin review of cases cited by Defendants (.5).				
Service	07/26/2022	Emails with J. Rando regarding computer monitors and assignment of lease (.2); emails with N. Hill regarding living expenses (.1); emails with J. Rando regarding execution of guaranty and assignment (.1).	KD	0.40	\$360.00	\$144.00
Service	07/27/2022	Emails with J. Rando regarding assignment of lease and office move (.5); confer with Receiver and C. Brun regarding same (.7); begin drafting agreement between Receiver, ABS and J. Rando (.3); confer with Receiver regarding Defendants' request for fees and living expenses (.2); emails with counsel regarding same (.2); emails with D. Rosenthal and J. Rando regarding assignment of lease (.2); emails with C. Brun and N. Hill regarding Department of Revenue (.2); leave message for T. Arnold, Department of Revenue (.1); emails with C. Molesworth, Block, regarding records certification (.1).	KD	2.50	\$360.00	\$900.00
Service	07/27/2022	Emails with N. Hill regarding Rando attorney's fees and living expenses (.2); emails with K. Bonfiglio, Keap, and Receiver (.1).	KD	0.30	\$360.00	\$108.00
Service	07/28/2022	Continue drafting agreement between Receiver, ABS and J. Rando (.5); confer with Receiver regarding same (.3); emails and telephone call with counsel regarding motion for leave to reply (.1); conference call with FTC counsel and N. Hill regarding funding for Defendants' living expenses and fees (.2).	KD	1.10	\$360.00	\$396.00
Service	07/28/2022	Confer with Receiver regarding personal belongings at office (.1); emails with C. Brun, N. Hill, and J. Rando regarding Comcast transfer (.2); review New Business Activity from M. and V. Rando (.1); emails with B. Welke and C. Bannan, Cardone Capital, regarding information request (.1); emails with J. Rando regarding agreement between ABS and Receiver regarding furniture (.2).	KD	0.70	\$360.00	\$252.00
Service	07/29/2022	Emails with J. Rando regarding agreement with Receiver (.2); confer with Receiver regarding same (.2); revise same (.1); review Cardone and REI information (.2); confer with Receiver regarding office handover (.2); emails with J. Rando and C.	KD	1.00	\$360.00	\$360.00

Invoice # 6240 - 09/07/2022

Brun regarding Comcast transfer (.1).

Service	07/30/2022	Emails with C. Brun regarding Comcast transfer (.1); emails with J. Cerio regarding wage claim (.1).	KD	0.20	\$360.00	\$72.00
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Services Subtotal **\$9,504.00**

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	07/13/2022	Cost to order transcript of June 17, 2022 hearing on Motion for Preliminary Injunction.	1.00	\$67.50	\$67.50

Expenses Subtotal **\$67.50**

Time Keeper	Quantity	Rate	Total
Katherine Donlon	26.4	\$360.00	\$9,504.00

Subtotal **\$9,571.50**

Total **\$9,571.50**

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
5988	07/07/2022	\$62,200.42	\$41,466.95	\$20,733.47
6230	09/07/2022	\$9,597.88	\$0.00	\$9,597.88

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6240	09/07/2022	\$9,571.50	\$0.00	\$9,571.50

Outstanding Balance **\$39,902.85**

Total Amount Outstanding **\$39,902.85**

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

Payment is due upon receipt.

EXHIBIT 4



INVOICE SUMMARY OF PROFESSIONALS
YIP ASSOCIATES

Maria M. Yip, Receiver
2 South Biscayne Boulevard
Suite 2690
Miami, Florida 33131

Invoice Number: 31563
Date: September 20, 2022

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

Professional	Initials	Position	Experience	Hours	Rate	Fees
Cristal Brun, MBA	CB	Lead Forensic Accountant	20 Years	23.4	\$295	\$ 6,903.00
Shawna B. Amarnani, CPA, CFE, CIRA	SBA	Lead Forensic Accountant	11 Years	22.5	\$295	\$ 6,637.50
Danny D. Zamorano, CPA	DDZ	Lead Forensic Accountant	6 Years	9.2	\$295	\$ 2,714.00
Susan Y. Tai	SYT	Senior Forensic Accountant	8 Years	16.0	\$225	\$ 3,600.00
Susan Y. Tai ¹	SYT	Senior Forensic Accountant	8 Years	17.2	\$113	\$ 1,935.00
Charles D. Bailey, CFE	CDB	Senior Forensic Accountant	6 Years	8.1	\$225	\$ 1,822.50
Christopher M. Vatti	CMV	Senior Forensic Accountant	6 Years	2.1	\$225	\$ 472.50
Total Fees:				98.5		\$ 24,084.50
Total Expenses:						\$ 1,303.92
Total Fees and Expenses:						\$ 25,388.42

Note:

¹Travel time has been charged at 50% of the discounted billing rate.



Invoice Number: 31563

INVOICE DETAIL YIP ASSOCIATES
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Maria M. Yip, Receiver
2 South Biscayne Boulevard
Suite 2690
Miami, Florida 33131

Invoice Number: 31563
Date: September 20, 2022

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

Date	Initials	Description	Hours	Rate	Amount
07/05/22	CB	Prepared schedule summarizing payables due; communications with K. Donlon re: correspondence received (.8); discussion with Receiver re: Ring Central (.1); discussion with Receiver re: invoices to be filed with the Court; outstanding invoices; incoming mail including chargebacks; new bank account and website (.6).	1.5	\$295	\$ 442.50
07/06/22	CB	Discussion with vendor re: insurance policy (.6); discussion with Receiver and SBA re: expenses due on behalf of the Receivership estate (.3); communications with SBA re: vendor research, invoices, expense balances due to be paid on behalf of Receivership estate (no charge).	0.9	\$295	\$ 265.50
07/06/22	SBA	Discussion with Receiver and CB re: expenses due on behalf of the Receivership estate (.3); analyzed outstanding accounts payable, logged into vendor accounts, searched for invoices, updated expense tracking log, and called vendors for various vendors including TubeBuddy, ClickFunnels, Authorize.net, Zoom, and SendinBlue (5.1).	5.4	\$295	\$ 1,593.00
07/07/22	SBA	Researched and responded to CB regarding Florida Revenue inquiry about First Coast Matchmakers payroll (1.2); continued analysis for accounts payable, identifying vendors and payments that needed to be made, directed payment of Zoom account and inquired with ClickFunnel regarding account balance (1.7).	2.9	\$295	\$ 855.50



Invoice Number: 31563

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/08/22	CB	Discussion with Receiver re: pending items.	0.1	\$295	\$ 29.50
07/08/22	SBA	Continued analysis of payables, identifying balances due and identifying potential additional accounts. Reviewed recent emails received to Gmail accounts in connection with reviewing for payables. Researched Comcast and Kajabi balances.	3.2	\$295	\$ 944.00
07/11/22	CB	Prepared for meeting with counsel re: follow-up documents and outstanding expenses due on behalf of Receivership estate, uploaded documents (personal bills and mail correspondence) (.6); updated expenses due on behalf of Receivership estate matrix (no charge); discussion with Hiscox insurance re: bill payment (.5); discussion with Receiver and Counsel re: Defendant's personal expenses and other documents to follow-up (.3); reviewed correspondence received (.2); discussion with FL Department of Revenue representative re: payroll for First Coast Matchmakers (.2); discussions with PC re: bill payments (no charge).	1.8	\$295	\$ 531.00



Invoice Number: 31563

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/22	SBA	Research of names of individuals for which we received credit cards in the mail to determine relationship to Defendants.	0.4	\$295	\$ 118.00
07/12/22	CB	Telephone discussion with representative from Authorize.Net re: account access/payment processing (.5); reviewed invoices/bills received in the mail (.3); reviewed documents/corresponded with counsel re: documents/bills received (.3); telephone discussions with representative from Chargebacks911 re: account (.4); discussion with R. Rohr re: Authorize.Net and Kajabi access (.1); discussion with SLB Insurance Group re: policy payment (.3) discussion with Navy Federal representative re: credit card bill payment (.1); discussion with Hiscox representative re: general liability policy (.1).	2.1	\$295	\$ 619.50
07/13/22	CB	Discussion with Counsel re: Paycor/bills outstanding (.4); researched policy renewal information for property insurance and Prosperity's historical information with Paycor processing (.3); discussion with property insurance representative (.4); discussion with Florida Dept. of Revenue representative re: child support notice (.3); discussion and correspondence with Paycor representative re: account access/payroll information (.4); discussion with general liability policy representative (.1).	1.9	\$295	\$ 560.50
07/14/22	CB	Discussion with managers at UPS location re: mail delivery (.1); discussion with FNBO customer service representatives re: credit card (.6); discussion with Hiscox representative re: policy reinstatement (.4); discussion with Authorize.net personnel re: account access, processed payment, secured account online, follow-up with R. Rohr re: same (.3).	1.4	\$295	\$ 413.00



Invoice Number: 31563

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/15/22	CB	Telephone conversation with Paycor representative re: account access (.6); discussion with K. Donlon re: bills outstanding, lease space, and Paycor update (.1).	0.7	\$295	\$ 206.50
07/18/22	CB	Telephone discussion with Paycor representative re: account access.	0.7	\$295	\$ 206.50
07/20/22	CB	Discussions with Receiver re: coordination of the collection of items in office location (.4); discussion with SYT re: collection of items and inventory in office location (no charge); reviewed inventory list (.1); discussion with R. Rohr re: collection of items on site (.1); discussion with SYT re: collection of items to be moved (.3); discussion with Paycor representative (.4).	1.3	\$295	\$ 383.50
07/20/22	SYT	Discussion with CB re: inventory and storage unit needed for computers, equipment, and office documents from current office location to be moved into storage (.3); discussion with manager at Atlantic Self Storage re: available storage units for rent and prices (.2).	0.5	\$225	\$ 112.50
07/21/22	CB	Reviewed correspondence received and followed-up with PC re: payment and corresponded with counsel re: mail for Defendants (.4); discussion with SBA re: office equipment move (no charge); discussion with FL Department of Revenue re: child support notices (.8); discussion with Paycor representative re: account access (.5); discussion with PC re: outstanding bills to be paid by Receiver (.4); discussion with SYT re: office equipment collection (no charge); reviewed documents re: potential related entities to J. Rando and D. Rando and reviewed payments made to these entities re: potential claims (.7); instructed DDZ re: schedule of payment to related entities (.1).	2.9	\$295	\$ 855.50



Invoice Number: 31563

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/21/22	SBA	Identified payments to Elite Customer Services, LLC, search e-discovery platform for invoices, prepared schedule of invoices from Elite to Prosperity Training Technology and compared to payments, and analysis of payments to Resource Management.	1.9	\$295	\$ 560.50
07/21/22	DDZ	Assisted with identification of potential causes of action.	1.8	\$295	\$ 531.00
07/22/22	DDZ	Preparation of schedules for settlement purposes (3.0); discussion with Receiver re: schedules on flow of funds (.2).	3.2	\$295	\$ 944.00
07/25/22	CB	Discussion with Receiver re: turnover of office space.	0.3	\$295	\$ 88.50
07/26/22	CB	Email correspondence with former employees re: collection of personal belongings (.6); discussions with Atlantic Storage manager re: new agreement (.7); discussion with SYT re: new storage unit (.2); discussion with R. Diaz re: EIN for Receivership estate (.1); prepared chain of custody forms (.1); discussions with Receiver and SYT re: finalizing the turnover of the offices (.4).	2.1	\$295	\$ 619.50
07/26/22	SYT	Prepared schedules of computers and books and records for removal from office location (1.2); discussion with CB re: new storage facility (.2); discussions with Receiver and CB re: finalizing the turnover of the offices (.4).	1.8	\$225	\$ 405.00



Invoice Number: 31563

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/27/22	CB	Correspondence with Atlantic Storage re: agreement, and review of storage review of agreement (.6); conference call with Dept. of Revenue re: reemployment taxes (.3); discussion with K. Donlon re: reemployment taxes (.1); discussion and correspondence with former employees re: collection of personal belongings (.4); communication with Comcast representative re: transfer of business accounts (.5); discussion with Receiver and P. Chuy re: transition of utilities (.4).	2.3	\$295	\$ 678.50
07/28/22	CB	Telephone conversation with Comcast representative re: transfer of business account ownership (.9); discussion with PC re: utilities account transfer (.1); correspondence and coordination of alarm system ownership transfer (.2).	1.2	\$295	\$ 354.00
07/28/22	SYT	Travel from Tallahassee to Jacksonville [Billed at 50% of the discounted hourly billing rate].	2.8	\$113	\$ 315.00
07/29/22	CB	Telephone conversation with Paycor representative re: online access for Receiver (.8); discussion with Comcast representative re: business account transfer (.6); discussion with Fifth Third Bank representative re: Defendant's bank account access and communication with Receiver re: same (.8).	2.2	\$295	\$ 649.00
07/29/22	SYT	Final removal of corporate defendants' books and records and computer equipment from Jacksonville office for turnover of office space.	6.9	\$225	\$ 1,552.50
07/29/22	SYT	Travel from Jacksonville to Tallahassee [Billed at 50% of the discounted hourly billing rate].	2.8	\$113	\$ 315.00
08/04/22	SYT	Discussion with Receiver re: planning & process for the removal of file cabinets containing business documents from M. Rando's storage unit to the Receivership's storage unit (.5); and communications with local mover to assist with	0.7	\$225	\$ 157.50



Invoice Number: 31563

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

For Professional Services Rendered July 2, 2022 through August 31, 2022

Date	Initials	Description	Hours	Rate	Amount
08/06/22	SYT	Physical relocation and inventory of corporate books and records from M. Rando's personal storage unit to Receiver's storage unit.	2.7	\$225	\$ 607.50
08/06/22	SYT	Roundtrip travel to and from Tallahassee to Jacksonville [Billed at 50% of the discounted hourly billing rate].	5.5	\$113	\$ 618.75
08/10/22	SYT	Discussion with Receiver re: monthly expenses.	0.1	\$225	\$ 22.50
08/15/22	SYT	Discussion with Receiver re: documents in storage.	0.3	\$225	\$ 67.50
08/22/22	CDB	Review of corporate books and records re: educational and training materials provided to customers of various packages.	1.1	\$225	\$ 247.50
08/22/22	SYT	Review of corporate books and records re: educational and training materials provided to customers of various packages.	1.2	\$225	\$ 270.00
08/25/22	SBA	Analyzed merchant accounts for First Coast Matchmakers dba Wholesale Tradelines.	2.8	\$295	\$ 826.00
08/25/22	CDB	Researched merchant accounts used by Wholesale Tradelines.	2.4	\$225	\$ 540.00
08/26/22	SBA	Discussions with SYT re: Tradelines analysis (.2); discussion with Receiver re: bank matrix and automobiles (.1); analyzed open orders by month and (1.3); instructed CDB re: same (.5); prepared bank account summary analysis (1.3); instructed DDZ on bank record review and bank matrix (.3).	3.7	\$295	\$ 1,091.50
08/26/22	DDZ	Discussion with SBA re: bank records and bank matrix (.3); reviewed additional bank records obtained and updated schedule of known bank accounts accordingly (3.9).	4.2	\$295	\$ 1,239.00



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/26/22	CDB	Researched documentation related to operation of Wholesale Tradelines (1.3); discussed Sales Summary Analysis with SBA (.5); prepared Sales Summary Analysis (2.8).	4.6	\$225	\$ 1,035.00
08/26/22	CMV	Reviewed corporate books and records for documentation on Wholesale Tradelines sales.	2.1	\$225	\$ 472.50
08/26/22	SYT	Searched and reviewed business records in Receiver's storage unit for First Coast Matchmakers d/b/a Wholesale Tradelines for select period (1.2); discussion with Receiver re: Wholesale Tradeline records in storage (.4); discussions with SBA re: Wholesale Tradelines analysis (.2).	1.8	\$225	\$ 405.00
08/26/22	SYT	Roundtrip travel to and from Tallahassee to Jacksonville [Billed at 50% of the discounted hourly billing rate].	6.1	\$113	\$ 686.25
08/29/22	SBA	Researched overdraft notice for Rando FTB account x8674 sent by Defendant's Counsel and provided Receiver with information about account (.6); analyzed Elite Customer Service accounts and activity (.7); reviewed proposed stipulated preliminary injunction draft (no charge).	1.3	\$295	\$ 383.50
08/31/22	SBA	Researched transactions and documents related to EZ Texting, responded to emails and searched E-Hounds repository for related records.	0.9	\$295	\$ 265.50
Total Fees			98.50		\$ 24,084.50
<u>Expenses</u>					
07/29/22	SYT	Reimbursement for Moving Service: Eddie's Delivery Service			\$ 120.00
07/29/22	SYT	Reimbursement for lodging at Residence Inn			\$ 203.28

Invoice Number: 31563



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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/30/22	SYT	Mileage Reimbursement: round trip travel to Jacksonville from Tallahassee (355.6 miles x .585 = \$208.03)			\$ 208.03
July 2022		Copies (1,063 pages x .15 = \$159.45)			\$ 159.45
08/06/22	SYT	Reimbursement for Moving Service: Eddie's Delivery Service			\$ 120.00
08/06/22	SYT	Mileage Reimbursement: round trip travel to Jacksonville from Tallahassee (355.6 miles x .585 = \$208.03)			\$ 208.03
08/26/22	SYT	Mileage Reimbursement: round trip travel to Jacksonville from Tallahassee (355.6 miles x .585 = \$208.03)			\$ 208.03
August 2022		Copies (514 pages x .15 = \$77.10)			\$ 77.10
Total Expenses					\$ 1,303.92
Total Amount Due					<u>\$ 25,388.42</u>

EXHIBIT 5



Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
07/01/2022	07/31/2022	36397	\$2959.00	FTC v. Rando	Due on Receipt

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 otherwise noted	Tech	Price	Ext
.5	07/01/2022		Expert conf call Brun/Rohr - RingCentral for FTC Review	RTR	\$350.00	\$175.00
1	07/01/2022		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	07/01/2022		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	07/05/2022		Expert Phone System Programming Update Billing/Create User (Super Admin) for SEC Review.	RTR	\$350.00	\$350.00
1	07/06/2022		Expert Consult Authorize.net lockout issue - Account locked by Authorize.net	RTR	\$350.00	\$350.00
.2	07/07/2022		Project Management 2FA for RingCentral for B Welke @ FTC	RTR	\$195.00	\$39.00

All balances are due upon receipt. Thank you!

SUBTOTAL **\$2959.00**

Payments Applied

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TOTAL **\$2959.00**

Balance Due \$2959.00

Retainer Amount Remaining **\$0.00**

Please note: Our fees are subject to change annually. Last change: 2/1/2022

Statement of Limited Liability and Financial Responsibility

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

E-Hounds also accepts:



Venmo: @ehounds

Zelle: support@ehounds.com



venmo



PayPal



Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
08/01/2022	08/31/2022	37992	\$2298.50	FTC v. Rando	Due on Receipt

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 otherwise noted	Tech	Price	Ext
1	08/01/2022		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	08/01/2022		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
.5	08/01/2022		Project Management Update and resolve billing issue w/GoDaddy Renewal		\$195.00	\$97.50
.3	08/22/2022		Project Management Research Kajabi Login/Status and respond to Receivers Team	RTR	\$195.00	\$58.50
.5	08/31/2022		Project Management Locate Forensic Image for V. Rando iMac	ERC	\$195.00	\$97.50

All balances are due upon receipt. Thank you!

SUBTOTAL **\$2298.50**

Payments Applied

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TOTAL **\$2298.50**

Balance Due \$2298.50

Retainer Amount Remaining **\$0.00**

Please note: Our fees are subject to change annually. Last change: 2/1/2022

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