

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 UNOPPOSED FOURTH APPLICATION FOR ORDER  
AWARDING FEES, COSTS, AND REIMBURSEMENT OF  
COSTS TO RECEIVER AND HER PROFESSIONALS**

Maria M. Yip, the Court-appointed Receiver (the "Receiver") over the corporate Defendants (the "Receivership Entities"<sup>1</sup>), the Court's Orders dated

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<sup>1</sup> 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.

January 10, 2023 (Docs. 116 and 117) (the “Appointment Order”), respectfully submits this Fourth 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 March 1, 2023 through August 31, 2023.

**I. The Receiver.**

The Receiver requests the Court award her fees for the professional services rendered and costs incurred from March 1, 2023 through August 31, 2023, in the amount of \$6,727.50 and \$723.00, respectively. Additionally, the Receiver advanced Operation Costs for the Receivership Entities in the amount of \$2,494.40. 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 March 1, 2023 through August 31, 2023, are 20.7 hours at \$325/hour.

**Receiver’s Time and Fees for Services Rendered**

<b>Professional</b>	<b>Position</b>	<b>Yrs. Exp.</b>	<b>Billed Hours</b>	<b>Rate</b>	<b>Total</b>
Maria M. Yip (MMY)	Receiver	30	20.7	\$325	\$6,727.50
Disbursements					\$723.00
<b>Total</b>					<b>\$7,450.50</b>

In addition to her professional fees, the Receiver had costs of \$723.00 as summarized below:

<b>Costs</b>	<b>Total</b>
Website	\$723.00
<b>Total</b>	<b>\$723.00</b>

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 \$2,494.40.

## II. Johnson Newlon & DeCort (“JND”).

The Receiver requests the Court award JND fees for professional services rendered and costs incurred from March 1, 2023 through August 31, 2023, in the amounts of \$13,463.00 and \$129.64, respectively. A copy of the statements summarizing the services rendered and costs incurred by JND from March 1, 2023 through August 31, 2023, is attached as Exhibit 3. JND’s time and fees for services rendered on this matter for each professional are as follows:

### **JND’s Time and Fees for Services Rendered**

<b>Professional</b>	<b>Position</b>	<b>Yrs. Exp.</b>	<b>Billed Hours</b>	<b>Rate</b>	<b>Total</b>
Katherine Donlon (KCD)	Partner	28	37.3	\$360.00	\$13,428.00
Mary Gura (MG)	Paralegal		.2	\$175.00	\$35.00
Fees					\$13,463.00
Disbursements					\$129.64
<b>Total</b>					<b>\$13,592.64</b>

In addition to legal fees, JND has advanced costs of \$129.64 in delivery fees related to the Court’s orders approving the real property sales.

### III. Yip Associates.

The Receiver requests the Court award Yip Associates fees for professional services rendered and costs incurred from March 1, 2023 through August 31, 2023, in the amount of \$17,377.00 and \$396.84, respectively. Travel time was billed at 50% discount. Yip Associates has completed the vast majority of its forensic accounting work for the Receiver. The bulk of the work during this period has related to marshaling and liquidating assets. 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**

<b>Professional</b>	<b>Position</b>	<b>Yrs. Exp.</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Hylton Wynick (HW)	Lead Forensic Accountant	27	1.4	\$295.00	\$413.00
Danny Zamorano (DDZ)	Lead Forensic Accountant	7	52.7	\$295.00	\$15,546.50
Susan Y. Tai (SYT)	Senior Forensic Accountant	8	3.5	\$225.00	\$787.50
Susan Y. Tai (SYT)	Senior Forensic Accountant	8	5.6	\$112.50 <sup>2</sup>	\$630.00
<b>Fees</b>					<b>\$17,377.00</b>

<sup>2</sup> Travel time billed at 50% of rate.

In addition to professional fees, Yip Associates had costs of \$396.84 as summarized below:

<b>Costs</b>	<b>Total</b>
Travel	\$256.07
Copies	\$50.55
Other	\$90.22
<b>Total</b>	<b>\$396.84</b>

#### **IV. E-Hounds, Inc.**

The Receiver requests the Court award E-Hounds fees for costs incurred from March 1, 2023 through August 31, 2023, in the amount of \$12,270.00. Copies of the statements summarizing the platform charges are attached as composite Exhibit 5.

#### **E-Hounds' Time and Fees for Services Rendered**

<b>Professional</b>	<b>Total</b>
Platform Charges	\$12,270.00
<b>Total</b>	<b>\$12,270.00</b>

#### **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 her 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 her Professionals, the Court should consider the circumstances surrounding the Receivership. *See Elliot*, 953 F.2d at 1577.

In determining the reasonableness of fees, the Court must calculate the lodestar, which is the “number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). This is in part based on the nature and extent of the services rendered and the value of those services. *See Grant v. George Schumann Tire & Battery Co.*, 908 F.2d 874, 877-78 (11th Cir. 1990) (bankruptcy fee award case addressing the issue of attorney’s fees generally before considering specific requirements in the bankruptcy context). Additionally, the Court should consider the twelve factors set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), a case involving an award of

attorneys' fees under federal civil rights statutes, as incorporated by the Eleventh Circuit in *Grant*, a bankruptcy case, are as follows: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill required to perform the legal services properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee for similar work in the community; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or by the circumstances; (8) the amount involved and results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. Based on the information provided herein as well as the Receiver's periodic status reports, 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.

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 JND 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. 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 Appointment Order, the Receiver, among other things, is authorized and empowered to engage professionals to assist her in carrying out her duties and obligations. The Appointment Order 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.

	<b>March 1, 2023 through August 31, 2023</b>		
	<i>Fees</i>	<i>Costs</i>	<i>Total</i>
<b>Receiver</b>	\$6,727.50	\$723.00	\$7,450.50
<b>Receiver - Operational Expenses</b>		\$2,494.40	\$2,494.50
<b>Yip Associates</b>	\$17,377.00	\$396.84	\$17,773.84
<b>Johnson Newlon &amp; DeCort</b>	\$13,463.00	\$129.64	\$13,592.64
<b>E-Hounds</b>		\$12,270.00	\$12,270.00
<b>Total</b>			<b>\$53,581.48</b>

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	\$9,945.00
Yip Associates	\$17,773.84
Johnson, Newlon & DeCort	\$13,592.64
E-Hounds, Inc.	\$12,270.00

**LOCAL RULE 3.01(g) CERTIFICATION**

Undersigned counsel for the Receiver has conferred with counsel for the FTC and they agree with the relief sought. Given that judgment has been entered against the Defendants, undersigned counsel has not conferred with counsel for Defendants.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 15, 2023, 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@jnd-law.com](mailto:kdonlon@jnd-law.com)  
JOHNSON, NEWLON &  
DECORT P.A.  
3242 Henderson Blvd., Ste 210  
Tampa, FL 33609  
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**

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

Invoice Number: 32004  
Date: September 5, 2023

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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Professional</u>	<u>Initials</u>	<u>Position</u>	<u>Experience</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Receiver	30 Years	20.7	\$325	\$ 6,727.50
<b>TOTALS:</b>				<u>20.7</u>		<u>\$ 6,727.50</u>

**Total Expenses:** \$ 723.00  
**Total Fees and Expenses:** \$ 7,450.50



**YIP ASSOCIATES**

FORENSIC ACCOUNTING +  
FINANCIAL INVESTIGATIONS

**INVOICE DETAIL**  
**MARIA M. YIP, RECEIVER**

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

Invoice Number: 32004  
Date: September 5, 2023

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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/02/23	MMY	Conference call with B. Welke, H. Park and K. Donlon (.7); telephone conversation with K. Donlon re: open matters (.6).	1.3	\$325	\$ 422.50
03/03/23	MMY	Discussion with R. Diaz re: payments to be paid (.2); discussion with D. Zamorano re: case status (.3).	0.5	\$325	\$ 162.50
03/06/23	MMY	Review of fee applications (1.0); discussion with D. Zamorano re: same (.8).	1.8	\$325	\$ 585.00
03/07/23	MMY	Discussion with D. Zamorano re: documents and open items (.4); telephone conversation with V. Rollings (State of Florida) (.2); meetings with jewelers re: Rolex watches (1.8); telephone conversation with Credit Game customer (.2); follow up meeting with jeweler re: sale (.5).	3.1	\$325	\$ 1,007.50
03/14/23	MMY	Discussion with K. Donlon and D. Zamorano re: case status and pending items.	0.5	\$325	\$ 162.50
03/16/23	MMY	Review of fee applications.	0.5	\$325	\$ 162.50

Invoice Number: 32004



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
03/16/23	MMY	Telephone conversation with K. Donlon re: Sondra Cove property, Cardone transfer documents and land trusts.	0.8	\$325	\$ 260.00
03/31/23	MMY	Telephone conversation with Jackie from the UPS Store re: last forwarding of mail (.1); telephone conversation with K. Donlon re: AVL Productions and Sondra Cove and John Rando (.2).	0.3	\$325	\$ 97.50
04/04/23	MMY	Approval of transfer to AVL (Tucker Albin) and email communications with same re: settlement of amounts due (.2); review of email communications (.2).	0.4	\$325	\$ 130.00
04/13/23	MMY	Telephone conversation with K. Donlon re: American Integrity payments.	0.1	\$325	\$ 32.50
04/18/23	MMY	Communications with K. Donlon re: John Rando's occupying receivership property.	0.3	\$325	\$ 97.50
04/24/23	MMY	Telephone conversation with Colin (ID#235) at Jefferson Capital re: transfer of information from Cap on Tap to close out the matter and discussion with R. Diaz re: same.	0.3	\$325	\$ 97.50
04/26/23	MMY	Discussion with M. Rando, R. Diaz and Cap on Tap re: authorization for receiver on account and update on letter to be sent from Jefferson Capital and Capital on Tap re: delay (.6); telephone conversation with William re: final notice based on outdated information; correspondence with K. Donlon re: same (.1).	0.7	\$325	\$ 227.50



Invoice Number: 32004



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/23	MMY	Email communications with Cardone Capital re: transfers and sale of interests (.2); receipt of email from Jefferson Capital and email communication to Mike Rando re: same (.1).	0.3	\$325	\$ 97.50
05/03/23	MMY	Communications with S. Ryan re: meeting (.1); email to M. Rando re: Amex x1005 statements which are needed (.1).	0.2	\$325	\$ 65.00
05/09/23	MMY	Meeting with R. Ryan and K. Donlon re: DOJ inquiry.	0.3	\$325	\$ 97.50
05/10/23	MMY	Call with M. Flynn (real estate agent) re: Jacksonville, FL properties.	0.7	\$325	\$ 227.50
05/11/23	MMY	Discussion with D. Zamorano re: Jacksonville properties (.3); email communications with M. Flynn re: listing of houses; HOA, utilities.; email communications with K. Donlon re: annual reports; communications with prospective buyer and adjustments to the contract (.6).	0.9	\$325	\$ 292.50
05/15/23	MMY	Email communications with M. Flynn re: listings, utilities, pesticides, and showings.	0.4	\$325	\$ 130.00
05/16/23	MMY	Review of credit card statements for Amex 91005 and telephone conversation with M. Rando re: credit card payment, equipment, real estate holdings (.7); review of email communications and agreements from Keller Williams re: listing agreement and maintenance to property (.5); email communication to American Integrity re: reissuance of checks (.3).	1.5	\$325	\$ 487.50

Invoice Number: 32004



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
05/22/23	MMY	Telephone conversation with K. Donlon re: status of Cardone, BMW, purchase of assets, and status report.	0.3	\$325	\$ 97.50
05/24/23	MMY	Review of invoices and disbursements for same.	0.1	\$325	\$ 32.50
06/02/23	MMY	Telephone conversation with M. Flynn and Eric re: sale of property.	0.3	\$325	\$ 97.50
06/03/23	MMY	Email communications with M. Flynn re: sale of property.	0.2	\$325	\$ 65.00
06/05/23	MMY	Telephone conversation with Dushan Moore re: anticipated distributions.	0.2	\$325	\$ 65.00
06/06/23	MMY	Email communications with realtor and K. Donlon re: motion for sale of properties.	0.1	\$325	\$ 32.50
06/07/23	MMY	Review of draft motion and proposed order to sell Kensington property including confirming data (.5); and telephone conversation with K. Donlon re: same and status (.5); meeting with B. Welke and K. Donlon re: status (.3).	1.3	\$325	\$ 422.50
06/12/23	MMY	Telephone conversation with John Williams re: registration and status (.2); email communications with M. Flynn re: motion and closing (.1).	0.3	\$325	\$ 97.50
06/28/23	MMY	Telephone conversation with K. Donlon re: landlord action.	0.2	\$325	\$ 65.00
06/30/23	MMY	Preparation of Third Status Report.	1.0	\$325	\$ 325.00

Invoice Number: 32004



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
07/11/23	MMY	Email communications with K. Donlon re: Pablo Station and resolution.	0.2	\$325	\$ 65.00
07/18/23	MMY	Telephone conversation with K. Donlon re: response from Cardone; bill of sale; website; Schwab; and other pending items.	0.4	\$325	\$ 130.00
07/19/23	MMY	Responded to customer calls (.2); email communication to Cardone Capital re: sale of investment (.1).	0.3	\$325	\$ 97.50
08/09/23	MMY	Conference call with Navy Federal representatives re: First Coast Matchmakers.	0.5	\$325	\$ 162.50
08/14/23	MMY	Communications with K. Donlon re: Navy Federal credit obligations.	0.2	\$325	\$ 65.00
08/25/23	MMY	Communications with K. Donlon re: customer; email communication with Navy Federal re: account balances.	0.1	\$325	\$ 32.50
08/29/23	MMY	Follow up with Cardone Capital regarding sale of investment and email communication to B. Welke re: status of Cardone.	0.1	\$325	\$ 32.50
<b>Total Fees</b>			<b>20.7</b>		<b>\$ 6,727.50</b>

Invoice Number: 32004



Re: Federal Trade Commission v Michael Rando  
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For Professional Services Rendered March 1, 2023 through August 31, 2023

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
03/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
04/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
05/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
04/07/23		K.Tek Systems (Website services) - site update for upload of court filings			\$ 112.50
06/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
06/02/23		K.Tek Systems (Website services) - site update for upload of court filings			\$ 112.50
07/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
08/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
<b>Total Expenses</b>					<b>\$ 723.00</b>
<b>Total Amount Due</b>					<b>\$ 7,450.50</b>

# **EXHIBIT 2**


**YIP ASSOCIATES**

 FORENSIC ACCOUNTING +  
 FINANCIAL INVESTIGATIONS

**DETAIL FOR RECEIVER'S OUT-OF-POCKET BUSINESS  
 EXPENSES OF CORPORATE DEFENDANTS  
 INCURRED FOR THE PERIOD MARCH 1, 2023 THROUGH AUGUST 31, 2023**

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

Invoice Number: 32005  
 Date: 09/05/2023  
 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>
03/01/23	Postage - FedEx	\$ 25.79
03/03/23	The UPS Store	\$ 21.57
03/03/23	The UPS Store	\$ 18.24
03/10/23	The UPS Store	\$ 19.97
03/10/23	The UPS Store	\$ 18.24
03/16/23	The UPS Store	\$ 19.31
03/16/23	The UPS Store	\$ 18.24
03/17/23	The UPS Store	\$ 19.97
03/22/23	The UPS Store	\$ 19.31
03/24/23	The UPS Store	\$ 18.24
03/26/23	Atlantic Self Storage	\$ 219.93



Invoice Number: 32005  
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>
03/31/23	The UPS Store	\$ 18.36
03/31/23	The UPS Store	\$ 18.24
04/11/23	GoDaddy Email (creditgameu.com)	\$ 69.90
04/15/23	The UPS Store	\$ 19.97
04/24/23	GoDaddy Email (creditgameu.com)	\$ 69.90
04/26/23	Atlantic Self Storage	\$ 219.93
04/28/23	The UPS Store	\$ 19.97
05/15/23	The UPS Store	\$ 19.97
05/20/23	The UPS Store	\$ 19.97
05/24/23	Russell Pest Solutions	\$ 130.00
05/24/23	GoDaddy Email (creditgameu.com)	\$ 69.90
05/26/23	Atlantic Self Storage	\$ 219.93
06/02/23	The UPS Store	\$ 19.97
06/16/23	The UPS Store	\$ 19.97
06/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
06/26/23	Atlantic Self Storage	\$ 219.93
07/21/23	The UPS Store	\$ 18.36



Invoice Number: 32005  
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>
07/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
07/26/23	Atlantic Self Storage	\$ 219.93
08/01/23	GoDaddy Email (creditgameu.com) - Email Plus - Renewal - 1 year	\$ 191.76
08/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
08/26/23	Atlantic Self Storage	\$ 219.93
<b>TOTAL</b>		<b>\$ 2,494.40</b>



# **EXHIBIT 3**



# INVOICE

Date: 08/25/2023

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

3242 Henderson Boulevard, Suite 210  
Tampa, FL 33609

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
03/01/2023	MG	Initial review of non-party Goldman documents.	0.20	\$175.00	\$35.00
03/01/2023	KD	Review updated transfer documents from Cardone counsel (.3); confer with Receiver regarding same (.1); forward Cardone documents to counsel for M. Rando for execution (.1).	0.50	\$360.00	\$180.00
03/01/2023	KD	Emails with D. Goldman regarding files related to Receivership properties (.2).	0.20	\$360.00	\$72.00
03/02/2023	KD	Conference call with B. Welke, H. Park and Receiver regarding outstanding issues (.3); confer with Receiver regarding outstanding issues (.8); emails with D. Goldman regarding American Integrity and transfer of land trust properties (.5); email to J. Rando regarding rent payments (.2); email and telephone call with J. Booth (.2); email to N. Hill regarding Sondra Cove (.1); telephone call with B. Welke regarding sale of Cardone investments (.1); confer with Receiver regarding transfer of property (.4).	2.60	\$360.00	\$936.00
03/02/2023	KD	Email agreement to Receiver regarding J. Rando defaulted obligations (.1); follow up to S. Mougeot regarding response to subpoena (.1); draft letter to Schwab regarding liquidation of account (.3).	0.50	\$360.00	\$180.00
03/03/2023	KD	Review updated offer from A. Cordovez for Cardone interests (.2); emails with Receiver and Paycor counsel	0.40	\$360.00	\$144.00

(.2).					
03/08/2023	KD	Emails with N. Hill regarding Sondra Cove (.2); emails with Receiver regarding land trusts and Sondra Cove (.2); email to D. Goldman regarding valuation of properties (.1).	0.50	\$360.00	\$180.00
03/10/2023	KD	Email to N. Hill regarding New Wave 1099 (.1); telephone call from J. Paolini regarding properties for sale (.1); telephone call from J. Rando Sr. regarding properties (.2).	0.40	\$360.00	\$144.00
03/13/2023	KD	Emails with J. Rando Sr. regarding Sondra Cove (.1).	0.10	\$360.00	\$36.00
03/14/2023	KD	Emails with L. Adkins, Community First Credit Union, regarding Rando accounts (.2); follow up with N. Hill regarding execution of Cardone transfer documents (.1).	0.30	\$360.00	\$108.00
03/15/2023	KD	Telephone call with J. Rando regarding Sondra Cove and ABS debt (.3)	0.30	\$360.00	\$108.00
03/15/2023	KD	Update website filings with K-Tek (.2); emails with D. Zamorano regarding EIN for First Coast Matchmakers (.2); follow up with D. Goldman regarding transfers (.1); email to N. Hill regarding Sondra Cove property and need to have tenant vacate the premises (.2); follow up with N. Zoumberakis regarding K-1s (.1).	0.80	\$360.00	\$288.00
03/16/2023	KD	Email to E. Feeney regarding Maverick account (.2); communicate with J. Rando regarding outstanding issues (.3); confer with Receiver regarding Cardone, Sondra Cove and other outstanding issues (1.0); emails with D. Goldman regarding land trusts and property valuations (.4).	1.90	\$360.00	\$684.00
03/17/2023	KD	Receipt and review of Goldman fee agreement (.2); confer with Receiver regarding same (.1).	0.30	\$360.00	\$108.00
03/20/2023	KD	Telephone call with N. Hill regarding Cardone paperwork and Sondra Cove property (.2); email to consumers (MF and JL) regarding status (.2); confer with D. Zamorano regarding fees motion (.3)	0.70	\$360.00	\$252.00
03/22/2023	KD	Telephone call with N. Hill regarding Gunster's withdrawal (.2); confer with Receiver and B. Welke regarding same (.1); draft Motion for Order to Show Cause to require M. Rando to transfer Cardone interests (1.0); 3.01 email to B. Welke regarding same (.1).	1.40	\$360.00	\$504.00
03/23/2023	KD	Emails with N. Hill regarding Cardone transfer paperwork (.1).	0.10	\$360.00	\$36.00
03/27/2023	KD	Emails with Cardone and Receiver regarding fully executed transfer documents (.2); review Cardone Consent Statements for Electronic Delivery (.2); confer with Receiver regarding Goldman fee agreement (.2).	0.60	\$360.00	\$216.00

03/28/2023	KD	Emails with D. Goldman and Receiver regarding fee agreement (.2).	0.20	\$360.00	\$72.00
03/30/2023	KD	Email from Z. Qui, Webull, regarding Receiver's request for records (.1).	0.10	\$360.00	\$36.00
03/31/2023	KD	Confer with Receiver regarding outstanding issues (.3); communicate with J. Rando (.2); emails with S. Copeland regarding claim from AVL Productions (.1).	0.60	\$360.00	\$216.00
04/03/2023	KD	Emails with S. Copeland and Receiver regarding resolution of creditor claim from AVL Productions (.3).	0.30	\$360.00	\$108.00
04/04/2023	KD	Emails with D. Goldman regarding Land Trusts and deeds (.2).	0.20	\$360.00	\$72.00
04/04/2023	KD	Emails with consumer CH regarding registration process (.1).	0.10	\$360.00	\$36.00
04/05/2023	KD	Telephone call with N. Hill and B. Welke regarding Gunster's motion to withdraw as counsel.	0.20	\$360.00	\$72.00
04/12/2023	KD	Communicate with Receiver regarding J. Rando, office lease, and property transfers (.6).	0.60	\$360.00	\$216.00
04/13/2023	KD	Review American Integrity documents (.2).	0.20	\$360.00	\$72.00
04/14/2023	KD	Receipt and review of recorded deeds transferring properties to Receiver (.2).	0.20	\$360.00	\$72.00
04/18/2023	KD	Texts with J. Rando regarding Sondra Cove (.2); confer with Receiver regarding same (.1).	0.30	\$360.00	\$108.00
04/21/2023	KD	Emails with Receiver regarding J. Rando and American Integrity (.2).	0.20	\$360.00	\$72.00
04/22/2023	KD	Emails with M. Rando regarding tenant vacating Sondra Cove and Capital on Tap (.2).	0.20	\$360.00	\$72.00
04/24/2023	KD	Emails with M. Rando regarding Capital on Tap (.2).	0.20	\$360.00	\$72.00
04/26/2023	KD	Emails with Receiver regarding call with M. Rando regarding Capital on Tap (.3); review HOA notice received from D. Goldman regarding Kensington Lakes (.1); confer with Receiver regarding same (.1).	0.50	\$360.00	\$180.00
04/30/2023	KD	Emails with consumer JP regarding status update (.1).	0.10	\$360.00	\$36.00
05/02/2023	KD	Emails with M. Rando regarding Sondra Cove (key and vacating the premises) (.2).	0.20	\$360.00	\$72.00
05/03/2023	KD	Review and update Receiver's website (.5); confer with Receiver regarding same (.1).	0.60	\$360.00	\$216.00
05/05/2023	KD	Emails with J. Burns regarding motion to withdraw (.1).	0.10	\$360.00	\$36.00
05/08/2023	KD	Emails with Receiver regarding securing Sondra Cove (.1).	0.10	\$360.00	\$36.00

05/09/2023	KD	Conference call with S. Ryan and Receiver (.3); emails with Receiver regarding Sunbiz filings (.1); telephone call with C. Lindsay regarding status of distribution (.2).	0.60	\$360.00	\$216.00
05/11/2023	KD	Emails with Receiver regarding corporate filings for Receivership entities (.2).	0.20	\$360.00	\$72.00
05/12/2023	KD	Telephone call with Receiver regarding outstanding issues (.4); emails with M. Rando regarding credit issues (.2); emails with D. Goldman's office regarding invoice (.1).	0.70	\$360.00	\$252.00
05/12/2023	KD	Review listing agreements (.2); confer with Receiver regarding same (.1).	0.30	\$360.00	\$108.00
05/17/2023	KD	Return call to Steve Forry, BMW Financial Services (.1).	0.10	\$360.00	\$36.00
05/22/2023	KD	Confer with Receiver regarding outstanding issues (.2); emails with S. Forry regarding BMW disposition fee (.1); emails with E. Nostrand and Receiver regarding Kensington invoices (.1).	0.40	\$360.00	\$144.00
05/22/2023	KD	Email to consumer MF regarding status update (.1).	0.10	\$360.00	\$36.00
05/30/2023	KD	Emails with T. Brown regarding Kensington Lake HOA violations (.2); confer with Receiver regarding same (.1).	0.30	\$360.00	\$108.00
06/06/2023	KD	Review title agreement and need for property motions (.3); begin drafting motion to approve sale of properties (.5); telephone call with B. Welke regarding Vystar accounts (.2); email to counsel for Cardone regarding sale of interests (.1).	1.10	\$360.00	\$396.00
06/07/2023	KD	Continue drafting motions to approve sale of Kensington Lakes and Sondra Cove properties (2.8); confer with Receiver regarding same (.2); email to T. Brown regarding HOA lawsuit (.1).	3.10	\$360.00	\$1,116.00
06/07/2023	KD	Conference call with B. Welke, H. Park and Receiver (.2).	0.20	\$360.00	\$72.00
06/08/2023	KD	Emails with N. Zoumberakis regarding sales efforts on Cardone interests (.2).	0.20	\$360.00	\$72.00
06/12/2023	KD	Continue drafting motion to approve sale of Kensington Lakes property (.4); follow up email to T. Brown regarding dismissal of HOA suit (.1); emails with Receiver and real estate team regarding property inspections (.2); email to Chambers enclosing proposed order on motion to approve sale of Kensington Lakes property (.1); 3.01 email to B. Welke regarding Kensington motion (.1).	0.90	\$360.00	\$324.00
06/13/2023	KD	Review Court's Order approving sale of Kensington Lakes property (.2); confer with Receiver regarding same (.1).	0.30	\$360.00	\$108.00

06/14/2023	KD	Emails with realty team and Receiver regarding certified copy of Court's Order and status of Sondra Cove inspection (.3); emails with T. Brown regarding dismissal of HOA lawsuit related to Kensington Lakes (.2); confer with Receiver regarding same (.1); update website with Court filings (.2).	0.80	\$360.00	\$288.00
06/15/2023	KD	Email with real estate team regarding Sondra Cove sale (.2); review Addendum to sales contract (.1); finalize motion to approve sale of Sondra Cove property (.2); revise proposed Order granting same in light of Kensington Lakes order (.3); email proposed Order to Chambers (.1); review Court's order, forwarding same to team (.2); 3.01 email to B. Welke regarding Sondra Cove motion (.1).	1.20	\$360.00	\$432.00
06/20/2023	KD	Emails with Receiver regarding landlord lawsuit (.2); review complaint filed by Pablo Station (.2); emails with realty group regarding information needed for Sondra Cove closing (.2).	0.60	\$360.00	\$216.00
06/21/2023	KD	Emails with realty team regarding certified copy of Court's Order and status of Sondra Cove inspection (.3).	0.30	\$360.00	\$108.00
06/21/2023	KD	Communicate with closing team regarding certified copy of Court's order approving sale (.2).	0.20	\$360.00	\$72.00
06/22/2023	KD	Continued review of Pablo Station lawsuit (.3); emails with D. Black regarding same (.2).	0.50	\$360.00	\$180.00
06/23/2023	KD	Review closing documents for Sondra Cove property (.3); confer with Receiver regarding same (.1).	0.40	\$360.00	\$144.00
06/26/2023	KD	Email to N. Zoumberakis regarding Cardone investments (.1); conference call with D. Black and D. Rosenthal regarding lease (.4); telephone call and emails with B. Welke regarding same (.2).	0.70	\$360.00	\$252.00
06/28/2023	KD	Conference call with B. Welke and H. Park regarding lease issue (.5); confer with Receiver regarding real estate closings, lease issue and status report (.6).	1.10	\$360.00	\$396.00
06/29/2023	KD	Draft language for Status Report regarding landlord lawsuit (.3).	0.30	\$360.00	\$108.00
06/30/2023	KD	Follow up to Cardone regarding liquidation of positions (.1); review, revise, finalize and file Quarterly Status Report (.5).	0.60	\$360.00	\$216.00
07/06/2023	KD	Draft comprehensive email to D. Black regarding Receiver's position regarding propriety of landlord dispute and potential resolution (.3); confer with Receiver regarding same (.1).	0.40	\$360.00	\$144.00
07/09/2023	KD	Emails with D. Black regarding extension to respond to landlord dispute (.1); communicate with Receiver regarding same (.1).	0.20	\$360.00	\$72.00

07/11/2023	KD	Emails with D. Black regarding resolution of landlord dispute with Prosperity Training (.2); confer with Receiver and FTC regarding same (.2).	0.40	\$360.00	\$144.00
07/12/2023	KD	Emails with counsel for Cardone regarding demand for Cardone interests (.2).	0.20	\$360.00	\$72.00
07/14/2023	KD	Draft Bill of Sale for office furniture and fixtures (.3); email to Cardone requesting 2022 K-1s (.1).	0.40	\$360.00	\$144.00
07/17/2023	KD	Telephone call with B. Welke regarding Bill of Sale (.2); email from Cardone regarding purchase offer (.1); review 2022 K-1s (.1).	0.40	\$360.00	\$144.00
07/18/2023	KD	Revise Bill of Sale (.2); emails with D. Black regarding same (.2); communicate with R. During regarding website (.1); confer with Receiver regarding outstanding issues (.5).	1.00	\$360.00	\$360.00
07/20/2023	KD	Review payments received from J. Rando (.2); draft Release and Cancellation of Agreements (.5); confer with Receiver regarding same (.1); email to J. Rando regarding same (.1).	0.90	\$360.00	\$324.00
07/21/2023	KD	Emails with consumer RR regarding status update (.1).	0.10	\$360.00	\$36.00
07/24/2023	KD	Emails with consumer MF regarding status update (.1).	0.10	\$360.00	\$36.00
08/02/2023	KD	Attempts to contact J. Rando (.1); communicate with M. Rando regarding locating J. Rando (.1); exchange texts with J. Rando (.1).	0.30	\$360.00	\$108.00
08/14/2023	KD	Emails with Receiver regarding Navy Federal issues.	0.30	\$360.00	\$108.00
08/23/2023	KD	Emails with Sondra Cove HOA regarding invoice.	0.20	\$360.00	\$72.00
08/24/2023	KD	Email from A. Cordovez regarding Cardone (.1); emails with consumer MF regarding registration (.1).	0.20	\$360.00	\$72.00
08/25/2023	KD	Attempts to contact J. Rando (.1); communicate with M. Rando (.1).	0.20	\$360.00	\$72.00

**Quantity Subtotal** **37.5**

**Services Subtotal** **\$13,463.00**

## Expenses

Date	Type	Attorney	Description	Total
06/14/2023	Expense	MBP	Overnight mail to Nolan Winarchick, Ponte Verda Title, LLC. with certified copy of Doc. 133 - Doc 133 ORDER granting Receiver's Verified Unopposed Motion to Approve Private Sale of 12311 Kensington Lakes Drive, Unit 202, Jacksonville, Florida 32246	\$26.46
06/26/2023	Expense	MH	Xpress Deliveries - Fee to retrieve certified copies of Docs 133 and	\$76.72

136 from federal courthouse.			
07/10/2023	Expense	MBP	Overnight mail to Ponte Vedra Title, LLC on 6/16/23. \$26.46
<b>Expenses Subtotal</b>			<b>\$129.64</b>

Time Keeper	Quantity	Rate	Total
Katherine Donlon	37.3	\$360.00	\$13,428.00
Mary Gura	0.2	\$175.00	\$35.00
<b>Quantity Total</b>			<b>37.5</b>
<b>Subtotal</b>			<b>\$13,592.64</b>
<b>Total</b>			<b>\$13,592.64</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7314	08/25/2023	\$13,592.64	\$0.00	\$13,592.64
<b>Outstanding Balance</b>				<b>\$13,592.64</b>
<b>Total Amount Outstanding</b>				<b>\$13,592.64</b>

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

Payment is due upon receipt.



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

## INVOICE

3242 Henderson Boulevard, Suite 210  
Tampa, FL 33609

Date: 08/25/2023



### Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, [click here](#) if you're viewing on a computer or smartphone.

# **EXHIBIT 4**



<b>INVOICE SUMMARY OF PROFESSIONALS</b> <b>YIP ASSOCIATES</b>
--

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

Invoice Number: 32003  
Date: September 5, 2023

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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Professional</u>	<u>Initials</u>	<u>Position</u>	<u>Experience</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
Hylton Wynick	HW	Lead Forensic Accountant	27 Years	1.4	\$295	\$ 413.00
Danny D. Zamorano, CPA	DDZ	Lead Forensic Accountant	7 Years	52.7	\$295	\$ 15,546.50
Susan Y. Tai	SYT	Senior Forensic Accountant	8 Years	3.5	\$225	\$ 787.50
Susan Y. Tai <sup>1</sup>	SYT	Senior Forensic Accountant	8 Years	5.6	\$112.50	\$ 630.00
<b>TOTALS:</b>				<b>63.2</b>		<b>\$ 17,377.00</b>
<b>Total Expenses:</b>						<b>\$ 396.84</b>
<b>Adjusted Fees and Expenses:</b>						<b>\$ 17,773.84</b>

**Note:**

<sup>1</sup>Travel time has been charged at 50% of the discounted billing rate



**YIP ASSOCIATES**

FORENSIC ACCOUNTING +  
FINANCIAL INVESTIGATIONS

**INVOICE DETAIL**  
**YIP ASSOCIATES**

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

Invoice Number: 32003  
Date: September 5, 2023

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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/03/23	DDZ	Discussion with M. Yip, Receiver re: case status (.3); email communications with Prosperity Training Technology LLC's ex-employee re: W2 Form (.4).	0.7	\$295	\$ 206.50
03/06/23	DDZ	Discussion with M. Yip, Receiver re: fee applications.	0.8	\$295	\$ 236.00
03/07/23	DDZ	Various communications with Florida Department of Revenue re: Reemployment Taxes (2.8); communications with Hiscox Insurance to cancel policy (.3); gathered documents and information relevant for tax filings (2.3); discussion with M. Yip, Receiver re: documents and open items (.4).	5.8	\$295	\$ 1,711.00
03/09/23	DDZ	Gathering, organization, review and analysis of various receivership documents, including correspondence, bank records, agreements, property records, tax records and other.	7.3	\$295	\$ 2,153.50
03/10/23	HW	Researched tax matters related to extensions (.9); discussion with DDZ re: same (.5).	1.4	\$295	\$ 413.00

Invoice Number: 32003



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/10/23	DDZ	Continued gathering, organization, review and analysis of various receivership documents, including correspondence, bank records, agreements, property records, tax records and other (7.2); discussion with HW re: tax matters related to extensions (.5).	7.7	\$295	\$ 2,271.50
03/14/23	DDZ	Discussion with M. Yip, Receiver and K. Donlon re: case status and pending items.	0.5	\$295	\$ 147.50
03/15/23	DDZ	Continued gathering, organization, review and analysis of various receivership documents, including correspondence, bank records, agreements, property records, tax records and other.	7.1	\$295	\$ 2,094.50
04/07/23	DDZ	Communications with Keap representative re: production of records and termination of account.	0.2	\$295	\$ 59.00
04/17/23	DDZ	Communications with Prosperity Training Technology LLC's ex-employees re: 2022 W2 Forms.	0.6	\$295	\$ 177.00
05/09/23	DDZ	Coordinated with local real estate agent to serve as listing agent for real estate properties located in Jacksonville, FL (1.6); coordinated with SYT to provide real estate agent with access to properties (.5).	2.1	\$295	\$ 619.50
05/09/23	SYT	Coordinated with DDZ re: providing real estate agent with access to Jacksonville, FL properties.	0.5	\$225	\$ 112.50
05/10/23	DDZ	Assisted M. Yip, Receiver with preparation of Receiver's Third Status Report.	5.5	\$295	\$ 1,622.50

Invoice Number: 32003



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/10/23	SYT	Replaced locks on 285 Sondra Cove Trail E, Jacksonville, FL 32225 property (0.8); met with realtor Michelle Flynn re: Sondra Cove Trl and Kensington Lakes Unit 202 property (1.8).	2.6	\$225	\$ 585.00
05/10/23	SYT	Travel to/ from TLH to JAX. [Billed at 50% of the discounted hourly billing rate]	5.6	\$112.50	\$ 630.00
05/11/23	DDZ	Discussion with M. Yip, Receiver re: Jacksonville properties.	0.3	\$295	\$ 88.50
05/16/23	SYT	Prepared document for realtor re: Sondra Cove Trl and Kensington Lakes properties.	0.4	\$225	\$ 90.00
05/18/23	DDZ	Preparation of analysis of cash receipts and disbursements for Receiver's Third Status Report.	2.8	\$295	\$ 826.00
05/19/23	DDZ	Assisted with preparation of Receiver's Third Status Report.	3.8	\$295	\$ 1,121.00
05/23/23	DDZ	Assisted with preparation of Receiver's Third Status Report (1.3); communicated with Kensington Lakes HOA and made arrangements to rectify violation identified by HOA (1.2).	2.5	\$295	\$ 737.50
05/24/23	DDZ	Numerous discussions with HOA personnel to have Kensington Lakes property violation rectified.	1.4	\$295	\$ 413.00
06/21/23	DDZ	Assisted M. Yip, Receiver with completion of FTC survey.	1.4	\$295	\$ 413.00
06/30/23	DDZ	Assisted M. Yip, Receiver with preparation of Receiver's Third Status Report.	1.0	\$295	\$ 295.00

Invoice Number: 32003



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

For Professional Services Rendered March 1, 2023 through August 31, 2023

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/15/23	DDZ	Assisted Receiver with review of Navy Federal Credit Union credit card activity.	1.2	\$295	\$ 354.00
			<b>Total Fees</b>	<b>63.2</b>	<b>\$ 17,377.00</b>
<b><u>Expenses</u></b>					
		Copies (337 pages x .15 = \$50.55)			\$ 50.55
05/10/23	SYT	Mileage Reimbursement: round trip travel to Jacksonville from Tallahassee (352 miles x .655 = \$230.56)			\$ 230.56
05/10/23	SYT	Travel Expenses			\$ 25.51
05/10/23	SYT	New Storage Lock			\$ 90.22
<b>Total Expenses</b>					<b>\$ 396.84</b>
<b>Total Amount Due</b>					<b>\$ 17,773.84</b>

# **EXHIBIT 5**





All funds payable to:

**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

## Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
03/01/2023	3/31/2023	42997	<b>\$2045.00</b>	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	03/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	03/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

Payments Applied	

SUBTOTAL **\$2045.00**

TOTAL **\$2045.00**

**Balance Due** **\$2045.00**

Retainer Amount Remaining  

**Please note: Our fees are subject to change annually. Last change: 1/2/2018**

### 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:



All funds payable to:

**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

## Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
04/01/2023	04/30/2023	43954	<b>\$2045.00</b>	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	04/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	04/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

Payments Applied	

SUBTOTAL **\$2045.00**

TOTAL **\$2045.00**

**Balance Due** **\$2045.00**

Retainer Amount Remaining  

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**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

## Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
05/01/2023	05/31/2023	44779	<b>\$2045.00</b>	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	05/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	05/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00

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Payments Applied	

SUBTOTAL **\$2045.00**

TOTAL **\$2045.00**

**Balance Due** **\$2045.00**

Retainer Amount Remaining  

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**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

## Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
06/01/2023	06/30/2023	45780	<b>\$2045.00</b>	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	06/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	06/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

Payments Applied	

SUBTOTAL **\$2045.00**

TOTAL **\$2045.00**

**Balance Due** **\$2045.00**

Retainer Amount Remaining

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**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

# Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
07/01/2023	07/31/2023	46715	<b>\$2045.00</b>	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	07/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
7	07/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

SUBTOTAL **\$2045.00**

Payments Applied	

TOTAL **\$2045.00**

**Balance Due \$2045.00**

Retainer Amount Remaining

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32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

## Invoice for Services

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E10137)	Terms
08/01/2023	08/31/2023	47474	<b>\$2045.00</b>	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
7	08/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	08/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

SUBTOTAL **\$2045.00**

Payments Applied	

TOTAL **\$2045.00**

**Balance Due \$2045.00**

Retainer Amount Remaining

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