

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 FIFTH 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"¹), the Court's Orders dated

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.

January 10, 2023 (Docs. 116 and 117) (the “Appointment Order”), respectfully submits this Fifth 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 September 1, 2023, through August 31, 2024.

I. The Receiver.

The Receiver requests the Court award her fees for the professional services rendered and costs incurred from September 1, 2023 through August 31, 2024, in the amount of \$3,250.00 and \$1,247.00, respectively. Additionally, the Receiver advanced Operation Costs for the Receivership Entities in the amount of \$29,641.56. 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 September 1, 2023 through August 31, 2024, are 10 hours at \$325/hour.

Receiver’s Time and Fees for Services Rendered

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Maria M. Yip (MMY)	Receiver	30	10	\$325	\$3,250.00
Total					\$3,250.00

In addition to her professional fees, the Receiver had costs of \$1,247.00 as summarized below:

Costs	Total
Website	\$1,247.00
Total	\$1,247.00

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 \$29,461.56.

II. Johnson Newlon & DeCort (“JND”).

The Receiver requests the Court award JND fees for professional services rendered from September 1, 2023 through August 31, 2024, in the amounts of \$11,159.00. A copy of the statement summarizing the services rendered by JND from September 1, 2023 through August 31, 2024, 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

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Katherine Donlon (KCD)	Partner	28	31.9	\$360.00	\$11,124.00
Mary Gura (MG)	Paralegal		.2	\$175.00	\$35.00
Fees					\$11,159.00
Disbursements					\$0.00
Total					\$11,159.00

III. Yip Associates.

The Receiver requests the Court award Yip Associates fees for professional services rendered from September 1, 2023 through August 31,

2024, in the amount of \$21,698.75. 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. A copy of the statement summarizing the services rendered for the pertinent period, including a summary of the professionals' hours, is attached as Exhibit 4.

Yip Associates Time and Fees for Services Rendered

Professional	Position	Yrs. Exp.	Hours	Rate	Total
Hylton Wynick (HW)	Lead Forensic Accountant	27	17.3	\$295.00	\$5,103.50
Danny Zamorano (DDZ)	Lead Forensic Accountant	7	49.2	\$295.00	\$14,514.00
Susan Y. Tai (SYT)	Senior Forensic Accountant	8	6.8	\$225.00	\$1,530.00
Susan Y. Tai (SYT)(travel time)	Senior Forensic Accountant	8	4.9	\$112.50	\$551.25
Fees					\$21,698.75
Disbursements					\$0.00
Total					\$21,698.75

IV. E-Hounds, Inc.

Over the life of this Receivership, E-Hounds has provided the online platform for all of the electronic records involved in this matter. Given the status of the case, the Receiver has not submitted a fees motion for a year.

However, E-Hounds has continued to provide these services and submitted timely invoices. After a year, the Receiver, at E-Hounds' request, paid their outstanding invoices. The Receiver requests that the Court approve E-Hounds fees for services rendered and costs incurred from September 1, 2023 through August 31, 2024, in the amount of \$20,518.75. Furthermore, because the Receiver has already paid the E-Hounds fees, the Receiver has included those fees as part of the Operational Costs advances shown in Exhibit 2. Copies of the E-Hounds statements summarizing the platform charges are attached as composite Exhibit 5.

E-Hounds' Time and Fees for Services Rendered

Professional	Position	Hours	Rate	Total
Robert Rohr (RTR)	Project Management	4.5	\$195.00	\$877.50
Disk Drives				\$429.00
Overnight Delivery				\$72.25
Platform Charges				\$19,140.00
Total				\$20,518.75

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.

	September 1, 2023 through August 31, 2024		
	<i>Fees</i>	<i>Costs</i>	<i>Total</i>
Receiver	\$3,250.00	\$1,247.00	\$4,497.00
Receiver - Operational Expenses	N/A	\$29,461.56	\$29,461.56
Yip Associates	\$21,698.75	\$0.00	\$21,698.75
Johnson Newlon & DeCort	\$11,159.00	\$0.00	\$11,159.00
E-Hounds²	\$20,518.75	\$0.00	N/A
Total			\$66,816.31

² These fees have been advanced by the Receiver, so payment for these fees should be payable to the Receiver as part of the Receiver's Operational Expenses.

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	\$33,958.56
Yip Associates	\$21,698.75
Johnson, Newlon & DeCort	\$11,159.00

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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 20, 2024, 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

JOHNSON, NEWLON & DECORT P.A.

3242 Henderson Blvd., Ste 210

Tampa, FL 33609

Tel: (813) 291-3300

Fax: (813) 235-0462

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


YIP ASSOCIATES

 FORENSIC ACCOUNTING +
 FINANCIAL INVESTIGATIONS

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: 32341
 Date: September 16, 2024

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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/05/23	MMY	Discussion with Prosperity Training Technology customer re: status.	0.1	\$325	\$ 32.50
09/14/23	MMY	Meeting with K. Donlon, B. Welke and H. Park re: Cardone investment.	0.5	\$325	\$ 162.50
09/15/23	MMY	Review of distributions from Cardone and email communication with Cardone representative re: follow-up on sale of investments.	0.1	\$325	\$ 32.50
10/13/23	MMY	Review of Order approving fees and disbursements of same.	0.1	\$325	\$ 32.50
11/01/23	MMY	Review of Receiver's Status Report and comments.	0.2	\$325	\$ 65.00
11/06/23	MMY	Meeting with K. Donlon, H. Park and B. Welke on Cardone investment status.	0.2	\$325	\$ 65.00
12/13/23	MMY	Meeting with B. Welke, H. Park and K. Donlon re: Cardone investment.	0.3	\$325	\$ 97.50
12/18/23	MMY	Conference call with B. Welke and K. Donlon re: Cardone investment.	0.2	\$325	\$ 65.00

Invoice Number: 32341



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONSRe: Federal Trade Commission v Michael Rando
Case No.: 3:22-cv-00487-TJC-MCR

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/08/24	MMY	Communication with K. Donlon re: Cardone investment.	0.1	\$325	\$ 32.50
01/09/24	MMY	Communications with S. Bhandari and K. Donlon re: meeting to discuss Cardone funds.	0.1	\$325	\$ 32.50
01/16/24	MMY	Meeting with S. Bhandari and K. Donlon re: Cardone investment.	0.5	\$325	\$ 162.50
01/25/24	MMY	Meeting with K. Donlon and B. Welke re: Rando bankruptcy filing (.5); meeting with K. Donlon and D. Silva re: Cardone investment (.4).	0.9	\$325	\$ 292.50
02/01/24	MMY	Review of documents from Paycor.	0.1	\$325	\$ 32.50
02/06/24	MMY	Discussion with DDZ re: turnover of assets summary.	0.2	\$325	\$ 65.00
02/13/24	MMY	Telephone conversations with A. Calzado re: status of case (.5); telephone conversations with K. Donlon re: Cardone capital (.3).	0.8	\$325	\$ 260.00
02/21/24	MMY	Meeting with K. Donlon and D. Silva re: Cardone assets.	0.3	\$325	\$ 97.50
03/01/24	MMY	Discussion with DDZ re: documentation and information provided by Cardone.	0.2	\$325	\$ 65.00
03/04/24	MMY	Conference call with K. Donlon and B. Welke re: cardone offer.	0.5	\$325	\$ 162.50
03/13/24	MMY	Meeting with K. Donlon, B. Wilke and M. Mora re: Rando bankruptcy.	0.9	\$325	\$ 292.50

Invoice Number: 32341



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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/20/24	MMY	Email communications with K. Donlon re: counter-offer to Cardone and emails communications with FTC re: status.	0.2	\$325	\$ 65.00
03/22/24	MMY	Telephone conversation with K. Donlon re: Cardone counter-offer; meeting with B. Welke and K. Donlon re: same; email communication with D. Silva re: counter-offer; review of communication with D. Silva re: sale agreement.	0.4	\$325	\$ 130.00
03/25/24	MMY	Communications with K. Donlon and B. Welke re: Cardone agreement.	0.1	\$325	\$ 32.50
03/25/24	MMY	Discussion with DDZ re: status of case and work to be done.	0.3	\$325	\$ 97.50
04/15/24	MMY	Review of communications on distributions.	0.1	\$325	\$ 32.50
04/19/24	MMY	Telephone conversation with K. Donlon re: agreement with Cardone and motion.	0.1	\$325	\$ 32.50
04/23/24	MMY	Discussion with DDZ and SYT re: remaining items in storage, destruction, sale, donation, and wrap up of case.	0.7	\$325	\$ 227.50
05/14/24	MMY	Conference call with DDZ, K. Donlon, DOJ, IRS re: documents and data.	0.5	\$325	\$ 162.50
05/15/24	MMY	Review of Cardone distributions.	0.1	\$325	\$ 32.50
05/21/24	MMY	Communications with K. Donlon and Bucalter attorneys re: finalizing documents.	0.3	\$325	\$ 97.50
06/03/24	MMY	Review and execution of agreement with Cardone.	0.3	\$325	\$ 97.50

Invoice Number: 32341



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONSRe: Federal Trade Commission v Michael Rando
Case No.: 3:22-cv-00487-TJC-MCR

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/12/24	MMY	Telephone conversation with J. Chapman re: purchase and withdrawal of funds from account.	0.2	\$325	\$ 65.00
06/26/24	MMY	Telephone conversation with J. Michael re: status of case.	0.2	\$325	\$ 65.00
07/12/24	MMY	Communications with E-Hounds, discussion with SYT re: sale of computer equipment; follow-up on documentation.	0.2	\$325	\$ 65.00
Total Fees			10.0		\$ 3,250.00

Expenses

09/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
10/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
11/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00
11/06/23		K.Tek Systems (Website services) - site update for upload of court filings			\$ 37.50
12/01/23		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
12/01/23		K.Tek Systems (Website services) - site update for upload of court filings			\$ 37.50
12/01/23		K.Tek Systems (Website services) - hosting charge for creditgamereceivership.com			\$ 83.00

Invoice Number: 32341



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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
02/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
03/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
04/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
05/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
06/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
07/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
07/31/24		Rad Technology (Website services) - site update for upload of court filings			\$ 37.50
08/01/24		Rad Technology (Website services) - hosting charge for creditgamereceivership.com			\$ 85.00
08/30/24		Rad Technology (Website services) - site update for upload of court filings			\$ 37.50
Total Expenses					\$ 1,247.00
Total Amount Due					\$ 4,497.00

EXHIBIT 2

**YIP ASSOCIATES**FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS**DETAIL FOR RECEIVER'S OUT-OF-POCKET BUSINESS
EXPENSES OF CORPORATE DEFENDANTS
INCURRED FOR THE PERIOD SEPTEMBER 1, 2023 THROUGH AUGUST 31, 2024**

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

Invoice Number: 32342
Date: 09/16/2024
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>
09/01/23	E-Hounds Inc.	\$ 3,027.50
09/01/23	Sunbiz.org annual report filing - Elite Customer	\$ 543.75
09/01/23	Sunbiz.org annual report filing - Prosperity Training	\$ 543.75
09/01/23	GoDaddy	\$ 20.17
09/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
09/26/23	Atlantic Self Storage	\$ 219.93
10/01/23	E-Hounds Inc.	\$ 2,045.00
10/07/23	GoDaddy	\$ 35.16
10/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
10/26/23	Atlantic Self Storage	\$ 219.93
11/01/23	E-Hounds Inc.	\$ 2,045.00



Invoice Number: 32342
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>
11/13/23	GoDaddy	\$ 22.17
11/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
11/26/23	Atlantic Self Storage	\$ 219.93
12/01/23	E-Hounds Inc.	\$ 2,045.00
12/24/23	GoDaddy Email (creditgameu.com)	\$ 89.90
12/26/23	Atlantic Self Storage	\$ 217.94
01/01/24	E-Hounds Inc.	\$ 2,441.25
01/24/24	GoDaddy Email (creditgameu.com)	\$ 89.90
01/26/24	Atlantic Self Storage	\$ 217.94
02/01/24	E-Hounds Inc.	\$ 2,045.00
02/07/24	Sunbiz.org annual report filing - Prosperity Training	\$ 143.75
02/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
02/26/24	Atlantic Self Storage	\$ 217.94
03/01/24	E-Hounds Inc.	\$ 1,145.00
03/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
03/26/24	Atlantic Self Storage	\$ 217.94
04/01/24	E-Hounds Inc.	\$ 1,145.00



Invoice Number: 32342
Matter ID: 172.0003

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

Date	Description	Amount
04/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
04/26/24	Atlantic Self Storage	\$ 217.94
05/01/24	E-Hounds Inc.	\$ 1,145.00
05/03/24	Florida Department of Revenue - ReEmployment Tax for periods 03/20 & 06/20	\$ 2,963.79
05/03/24	Sunbiz.org dissolution filing - Elite Customer	\$ 25.00
05/06/24	Networksolutions.com - CREDITGAMERECEIVERSHIP.COM Domain Annual renewal	\$ 37.99
05/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
05/26/24	Atlantic Self Storage	\$ 217.94
05/30/24	GoDaddy - Email Plus - Renewal - 2 year	\$ 719.28
06/01/24	E-Hounds Inc.	\$ 1,145.00
06/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
06/26/24	Atlantic Self Storage	\$ 212.97
07/01/24	E-Hounds Inc.	\$ 1,145.00
07/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
07/26/24	Atlantic Self Storage	\$ 214.52
08/01/24	E-Hounds Inc.	\$ 1,145.00



FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32342
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>
08/01/24	GoDaddy	\$ 239.76
08/24/24	GoDaddy Email (creditgameu.com)	\$ 109.90
08/26/24	Atlantic Self Storage	\$ 214.52
TOTAL		\$ 29,641.56

EXHIBIT 3



INVOICE

Invoice # 8783
Date: 09/10/2024

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.

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	09/14/2023	Conference call with Receiver, B. Welke and H. Park regarding status update (.7); confer with Receiver regarding outstanding issues (.3).	KD	1.00	\$360.00	\$360.00
Service	09/18/2023	Review American Integrity checks and Receiver's authority under various orders (.9); confer with Receiver regarding same (.2).	KD	1.10	\$360.00	\$396.00
Service	09/19/2023	Review information regarding Sondra Cove Land Trust (.3); confer with Receiver regarding American Integrity issues (.3).	KD	0.60	\$360.00	\$216.00
Service	11/06/2023	Finalize and file Receiver's Status Report (.2); email to R. During regarding additional filings for website (.2); confer with Receiver, B. Welke and H. Park regarding status of Cardone investments and landlord lawsuit (.3).	KD	0.70	\$360.00	\$252.00
Service	11/07/2023	Email to D. Black regarding Bill of Sale and dismissal of landlord case (.2); emails with consumer J.P. (.1).	KD	0.30	\$360.00	\$108.00
Service	12/13/2023	Emails with David Black regarding dismissal of landlord case.	KD	0.20	\$360.00	\$72.00
Service	12/13/2023	Conference call with Receiver, Brian Welke and Hong Park regarding status update.	KD	0.30	\$360.00	\$108.00
Service	12/19/2023	Communicate with two claimants regarding	MG	0.20	\$175.00	\$35.00

a distribution (.2).						
Service	01/16/2024	Conference call with Receiver and Sanjay Bhandari regarding Cardone investments.	KD	0.50	\$360.00	\$180.00
Service	01/24/2024	Review Rando bankruptcy docket and filings.	KD	0.50	\$360.00	\$180.00
Service	01/25/2024	Conference call with Receiver and B. Welke regarding Randos' bankruptcy filing (.5); conference call with Receiver and D. Silva regarding Cardone investments (.5).	KD	1.00	\$360.00	\$360.00
Service	02/05/2024	Emails with Brian Welke regarding status update with Cardone.	KD	0.20	\$360.00	\$72.00
Service	02/07/2024	Conference call with Danny Zamorano regarding spreadsheet requested by FTC regarding transfer of assets.	KD	0.30	\$360.00	\$108.00
Service	02/11/2024	Emails with consumer regarding status of redress process.	KD	0.10	\$360.00	\$36.00
Service	02/13/2024	Telephone call with Receiver regarding Cardone connections with M. Rando.	KD	0.30	\$360.00	\$108.00
Service	02/15/2024	Conference call with B. Welke and H. Park regarding Cardone connection with Receivership (.2); emails with Receiver regarding same (.1); email to D. Silva regarding Cardon investments (.2).	KD	0.50	\$360.00	\$180.00
Service	02/21/2024	Conference call with Receiver, D. Silva and A. Pear regarding offer from Cardone.	KD	0.30	\$360.00	\$108.00
Service	03/04/2024	Conference call with Receiver regarding Cardone information (.3); conference call with Receiver and B. Welke regarding same (.2).	KD	0.50	\$360.00	\$180.00
Service	03/13/2024	Conference call with Receiver, B. Welke, and M. Mora regarding Rando bankruptcy (1.0); telephone call with B. Welke regarding communication with Cardone's counsel (.2).	KD	1.20	\$360.00	\$432.00
Service	03/20/2024	Emails with D. Silva regarding Cardone negotiations (.1); emails with consumers regarding status update (.2).	KD	0.30	\$360.00	\$108.00
Service	03/22/2024	Telephone call with Receiver regarding Cardone offer (.4); conference call with Receiver and B. Welke regarding Cardone, bankruptcy case, and status update (.4).	KD	0.80	\$360.00	\$288.00
Service	03/25/2024	Emails with Receiver and B. Welke regarding Cardone proposal (.2); emails with D. Silva regarding written agreement to	KD	0.50	\$360.00	\$180.00

		memorialize sale (.2); emails with consumer regarding status of receivership (.1).				
Service	03/26/2024	Begin drafting motion to approve sale of Cardone interests (4.2); emails with Receiver, D. Zamorano and D. Silva regarding K-1s (.2); telephone call with B. Welke regarding Cardone (.1).	KD	4.50	\$360.00	\$1,620.00
Service	03/27/2024	Continue drafting motion to approve sale of Cardone interests (.9); emails with Receiver and D. Zamorano regarding same (.2); email to D. Silva regarding FTC's agreement to transaction (.1).	KD	1.20	\$360.00	\$432.00
Service	03/29/2024	Review and provide comment to draft Agreement from Dan Silva regarding Cardone transfer (.6); email to Receiver regarding same (.1).	KD	0.70	\$360.00	\$252.00
Service	04/19/2024	Review edits to Cardone purchase agreement (.3); confer with Receiver regarding same (.2); emails with A. Pear regarding same (.2).	KD	0.70	\$360.00	\$252.00
Service	04/24/2024	Telephone call with R. Rebeor regarding IRS investigation (.2); confer with Receiver regarding same (.1).	KD	0.30	\$360.00	\$108.00
Service	05/06/2024	Emails with A. Pear regarding status of sale documents.	KD	0.20	\$360.00	\$72.00
Service	05/06/2024	Emails with Alison Pear regarding status of sales agreement.	KD	0.20	\$360.00	\$72.00
Service	05/13/2024	Telephone call to A.R. regarding status update.	KD	0.10	\$360.00	\$36.00
Service	05/13/2024	Email to Alison Pear regarding status of sales agreement.	KD	0.10	\$360.00	\$36.00
Service	05/14/2024	Conference call with federal agents regarding status of receivership.	KD	0.90	\$360.00	\$324.00
Service	05/21/2024	Email to Alison Pear regarding status of sales agreement.	KD	0.10	\$360.00	\$36.00
Service	05/30/2024	Telephone call with C.R. regarding status of receivership.	KD	0.20	\$360.00	\$72.00
Service	05/30/2024	Review edits received from A. Pear regarding Cardone purchase agreement (.3); confer with Receiver regarding same (.1); emails with A. Pear regarding final version of agreement (.1).	KD	0.50	\$360.00	\$180.00
Service	06/03/2024	Emails with A. Pear regarding final	KD	1.30	\$360.00	\$468.00

		purchase agreement (.1); emails with Receiver regarding same (.1); emails with D. Zamorano regarding 2023 K-1s and updated distribution information for Cardone investments (.2); review information provided by D. Zamorano (.3); revise motion to approve sale of Cardone interests (.6).				
Service	06/05/2024	Telephone calls with B. Welke regarding status update (.1); emails with Receiver and Cardone attorneys regarding payment method and status of execution of sales agreement (.2); confer with Receiver regarding status of storage unit (.1); emails with consumer regarding status update (.2).	KD	0.60	\$360.00	\$216.00
Service	06/07/2024	Review inventory of storage unit and boxed documents (.3).	KD	0.30	\$360.00	\$108.00
Service	06/10/2024	Review fully executed purchase agreement (.2); finalize and file motion to approve sale of Cardone interests (.2).	KD	0.40	\$360.00	\$144.00
Service	06/13/2024	Emails with consumer regarding status of receivership.	KD	0.20	\$360.00	\$72.00
Service	06/21/2024	Emails with Alison Pear regarding status of motion to approve sale of Cardone interests.	KD	0.10	\$360.00	\$36.00
Service	06/24/2024	Emails with Alison Pear regarding Cardone motion.	KD	0.10	\$360.00	\$36.00
Service	06/25/2024	Emails with consumer regarding status of receivership.	KD	0.10	\$360.00	\$36.00
Service	07/02/2024	Telephone call and emails with consumers regarding status update on Receivership.	KD	0.20	\$360.00	\$72.00
Service	07/08/2024	Emails with Dan Silva and Alison Pear regarding status of Cardone motion.	KD	0.10	\$360.00	\$36.00
Service	07/08/2024	Emails with Ron During regarding website postings.	KD	0.20	\$360.00	\$72.00
Service	07/18/2024	Telephone call to Chambers regarding pending Cardone motion (.1); confer with Receiver regarding same (.1).	KD	0.20	\$360.00	\$72.00
Service	07/22/2024	Review Court's Order regarding sale of Cardone interest (1); email to Cardone counsel regarding same (.1).	KD	0.20	\$360.00	\$72.00
Service	07/23/2024	Emails with Alison Pear regarding transactional documents and wire instructions (.2); emails with consumer regarding status update (.2); review FTC	KD	0.60	\$360.00	\$216.00

asset survey (.2).						
Service	07/25/2024	Emails with D. Zamorano confirming receipt of July distribution.	KD	0.10	\$360.00	\$36.00
Service	07/26/2024	Emails with A. Pear, D. Zamorano, and Receiver regarding receipt of funds (.3); draft Notice of Completion of Cardone transaction to be filed in accordance with Court's order (.5); confer with Receiver regarding same (.1).	KD	0.90	\$360.00	\$324.00
Service	07/30/2024	Telephone call with B. Welke regarding Cardone closing and process to close out receivership (.2); confer with Receiver regarding same (.2).	KD	0.40	\$360.00	\$144.00
Service	07/31/2024	Begin drafting motion to close out receivership (.5); confer with Receiver regarding same (.1); emails with consumer regarding status update (.2).	KD	0.80	\$360.00	\$288.00
Service	08/05/2024	Email to R. During regarding filings for website (.1); continue drafting motion to wind down Receivership (2.3); emails with consumers regarding status update (.2).	KD	2.60	\$360.00	\$936.00
Service	08/14/2024	Revise motion to wind down receivership (.5); emails with consumers regarding status update (.1).	KD	0.60	\$360.00	\$216.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	30.9	\$360.00	\$11,124.00
Mary Gura	0.2	\$175.00	\$35.00
		Subtotal	\$11,159.00
		Total	\$11,159.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8783	09/10/2024	\$11,159.00	\$0.00	\$11,159.00
			Outstanding Balance	\$11,159.00

Total Amount Outstanding \$11,159.00

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

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 8783
Date: 09/10/2024



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



INVOICE SUMMARY OF PROFESSIONALS YIP ASSOCIATES
--

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

Invoice Number: 32340
 Date: September 16, 2024

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

For Professional Services Rendered September 1, 2023 through August 31, 2024

Professional	Initials	Position	Experience	Hours	Rate	Fees
Hylton Wynick	HW	Lead Forensic Accountant	27 Years	17.3	\$295	\$ 5,103.50
Danny D. Zamorano, CPA	DDZ	Lead Forensic Accountant	7 Years	49.2	\$295	\$ 14,514.00
Susan Y. Tai	SYT	Senior Forensic Accountant	8 Years	6.8	\$225	\$ 1,530.00
Susan Y. Tai ¹	SYT	Senior Forensic Accountant	8 Years	4.9	\$112.50	\$ 551.25
TOTALS:				78.2		\$ 21,698.75

Note:

¹Travel 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: 32340
 Date: September 16, 2024

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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/14/23	DDZ	Preparation of analysis of Cardone Investments.	1.0	\$295	\$ 295.00
09/21/23	DDZ	Reviewed E-Hounds invoices and prepared response to request from E-Hounds.	1.8	\$295	\$ 531.00
10/24/23	DDZ	Assisted Receiver with preparation of Receiver's Fourth Status Report.	4.4	\$295	\$ 1,298.00
10/31/23	DDZ	Assisted Receiver with preparation of Receiver's Fourth Status Report.	4.3	\$295	\$ 1,268.50
01/08/24	DDZ	Gathered and sent 2023 W-2 form for former employee of Prosperity Training Technology.	0.7	\$295	\$ 206.50
01/09/24	DDZ	Assisted Receiver with preparation of Receiver's Fifth Status Report.	1.6	\$295	\$ 472.00
02/06/24	DDZ	Discussion with Receiver re: turnover of assets summary (.2); prepared same (1.7).	1.9	\$295	\$ 560.50
02/07/24	DDZ	Continued preparation of turnover of assets summary.	1.5	\$295	\$ 442.50
02/26/24	DDZ	Assisted Receiver with preparation of Receiver's Fifth Status Report.	3.3	\$295	\$ 973.50
02/29/24	DDZ	Prepared summary of Cardone investments.	1.5	\$295	\$ 442.50

Invoice Number: 32340



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/01/24	DDZ	Prepared Summary of Cardone Investments (2.7); discussion with Receiver re: same (.2).	2.9	\$295	\$ 855.50
03/05/24	DDZ	Discussion with PC re: vendor invoice.	0.4	\$295	\$ 118.00
03/07/24	DDZ	Discussion with Receiver re: Cardone investments.	0.5	\$295	\$ 147.50
03/25/24	DDZ	Discussion with Receiver re: case status.	0.3	\$295	\$ 88.50
03/26/24	DDZ	Prepared schedule of distributions from Cardone Equity Funds.	1.1	\$295	\$ 324.50
04/02/24	HW	Researched matters relating to subscriber agreements and 2023 tax matters (3.3); discussion with DDZ re: same (.8).	4.1	\$295	\$ 1,209.50
04/02/24	DDZ	Discussion with HW re: tax implications of transfer of Cardone Equity Funds interest and other tax matters.	0.8	\$295	\$ 236.00
04/05/24	DDZ	Reviewed information and records in connection with 2023 income tax return preparation (1.2); discussion with HW re: tax basis of items liquidated in 2023 (.3).	1.5	\$295	\$ 442.50
04/05/24	HW	Discussion with DDZ re: tax basis of items liquidated in 2023.	0.3	\$295	\$ 88.50
04/08/24	HW	Follow up on open tax matters relating to 2022 and 2023.	2.2	\$295	\$ 649.00
04/09/24	HW	Researched tax matters related to 2022 and 2023.	3.3	\$295	\$ 973.50
04/10/24	HW	Prepared for and attended conference call with DDZ and A. Lasko re: income tax matters.	1.4	\$295	\$ 413.00

Invoice Number: 32340



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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/10/24	DDZ	Conference call with HW and A. Lasko re: income tax matters.	1.0	\$295	\$ 295.00
04/11/24	DDZ	Researched tax basis of assets transferred to Receivership.	1.3	\$295	\$ 383.50
04/12/24	HW	Various conferences with DDZ and RD on 2022 reporting for tax purposes (1.8); analysis of cash receipts and disbursements, K1's, relationships and reporting requirements (3.0).	4.8	\$295	\$ 1,416.00
04/12/24	DDZ	Various discussions with HW and RD re: tax filings and incorporation documents (1.8); prepared summary of receipts and disbursements for the years of 2022 and 2023 for preparation of income tax return (2.0).	3.8	\$295	\$ 1,121.00
04/15/24	DDZ	Discussions with HW re: tax filings (1.2); communications with the Florida Department of Revenue re: Past Due Notice (1.1).	2.3	\$295	\$ 678.50
04/15/24	HW	Discussions with DDZ re: tax filings.	1.2	\$295	\$ 354.00
04/23/24	DDZ	Discussion with Receiver and SYT re: next steps.	0.7	\$295	\$ 206.50
04/23/24	SYT	Discussion with Receiver and DDZ re: next steps.	0.7	\$225	\$ 157.50
04/24/24	DDZ	Downloaded and reviewed 2023 K-1s issued by the Cardone Investment Funds.	0.3	\$295	\$ 88.50
04/25/24	DDZ	Reviewed notice from Florida Department of Revenue (.3); discussion with RD re: payment to Florida Department of Revenue (.5).	0.8	\$295	\$ 236.00

Invoice Number: 32340



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

For Professional Services Rendered September 1, 2023 through August 31, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/03/24	DDZ	Discussion with RD and PC re: payment to Florida Department of Revenue (.3); completed dissolution of Elite Customer Services (1.2).	1.5	\$295	\$ 442.50
05/06/24	SYT	Preparation of draft inventory of books and records and other items maintained in off-site storage.	3.3	\$225	\$ 742.50
05/06/24	SYT	Roundtrip travel from Tallahassee to Jacksonville.	4.9	\$112.50	\$ 551.25
05/07/24	SYT	Completed draft inventory of books and records and other items maintained in off-site storage.	2.8	\$225	\$ 630.00
05/14/24	DDZ	Conference call with Receiver, Receiver's Counsel and DOJ re: receivership records.	1.0	\$295	\$ 295.00
06/03/24	DDZ	Preparation of Schedule of Payments Received from Cardone Equity Funds.	0.5	\$295	\$ 147.50
06/06/24	DDZ	Finalized inventory of books and records and other items stored at Atlantic Storage.	2.5	\$295	\$ 737.50
07/18/24	DDZ	Assisted Receiver with completion of FTC asset survey.	0.8	\$295	\$ 236.00
07/29/24	DDZ	Reviewed eHounds invoices and payment history.	0.5	\$295	\$ 147.50
08/12/24	DDZ	Reviewed E-Hounds invoices.	0.2	\$295	\$ 59.00
08/20/24	DDZ	Reviewed Motion to Wind Down Receivership (.5); prepared schedule of cash receipts and expenditures from commencement of receivership through current (.7).	1.2	\$295	\$ 354.00
08/21/24	DDZ	Continued preparation of schedule of cash receipts and disbursements.	1.3	\$295	\$ 383.50
Total Fees			78.2		\$ 21,698.75
Total Amount Due					\$ 21,698.75

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
09/01/2023	09/30/2023	47485	\$3027.50	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
7	09/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	09/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
1	09/01/2023		12TB External HDD		\$300.00	\$300.00
3.5	09/13/2023		Project Management Production Copy for IRS on all Preserved Evidence	RTR	\$195.00	\$682.50

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL **\$3027.50**

TOTAL **\$3027.50**

Balance Due \$3027.50

Retainer Amount Remaining **\$0.00**

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
10/01/2023	10/31/2023	48189	\$2045.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
7	10/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	10/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

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
11/01/2023	11/30/2023	48827	\$2045.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
7	11/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	11/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied

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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
12/01/2023	12/31/2023	50334	\$2045.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
7	12/01/2023		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	12/01/2023		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied

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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
01/01/2024	01/31/2024	50345	\$2441.25	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	01/01/2024		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	01/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00
1	01/30/2024		Production Compilation E10137-2 and E10137-3 images for DOJ	RTR	\$195.00	\$195.00
1	01/30/2024		FedEx Overnight DOJ Production Compilation	RTR	\$72.25	\$72.25
1	01/31/2024		3TB Transport Drive (Production Deliverable) DOJ Production Compilation	RTR	\$129.00	\$129.00

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL **\$2441.25**

TOTAL **\$2441.25**

Balance Due **\$2441.25**

Retainer Amount Remaining

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

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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
02/01/2024	02/29/2024	51808	\$2045.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
7	02/01/2024		E-Hounds Review Platform Add'l Users (per user) cbailey@yipcpa.com cbrun@yipcpa.com cvatti@yipcpa.com		\$150.00	\$1050.00
1	02/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

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

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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
03/01/2024	03/31/2024	51819	\$1145.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	03/01/2024		E-Hounds Review Platform Add'l Users (per user) dzamorano@yipcpa.com		\$150.00	\$150.00
1	03/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied

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SUBTOTAL **\$1145.00**

TOTAL **\$1145.00**

Balance Due \$1145.00

Retainer Amount Remaining

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

Statement of Limited Liability and Financial Responsibility

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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
04/01/2024	04/30/2024	53524	\$1145.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	04/01/2024		E-Hounds Review Platform Add'l Users (per user) dzamorano@yipcpa.com		\$150.00	\$150.00
1	04/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL **\$1145.00**

TOTAL **\$1145.00**

Balance Due \$1145.00

Retainer Amount Remaining

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

Statement of Limited Liability and Financial Responsibility

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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
05/01/2024	05/31/2024	53535	\$1145.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	05/01/2024		E-Hounds Review Platform Add'l Users (per user) dzamorano@yipcpa.com		\$150.00	\$150.00
1	05/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL **\$1145.00**

TOTAL **\$1145.00**

Balance Due \$1145.00

Retainer Amount Remaining

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

Statement of Limited Liability and Financial Responsibility

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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
06/01/2024	06/30/2024	54305	\$1145.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	06/01/2024		E-Hounds Review Platform Add'l Users (per user) dzamorano@yipcpa.com		\$150.00	\$150.00
1	06/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL **\$1145.00**

TOTAL **\$1145.00**

Balance Due \$1145.00

Retainer Amount Remaining

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

Statement of Limited Liability and Financial Responsibility

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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
07/01/2024	07/31/2024	55295	\$1145.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	07/01/2024		E-Hounds Review Platform Add'l Users (per user) dzamorano@yipcpa.com		\$150.00	\$150.00
1	07/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

Payments Applied	

SUBTOTAL **\$1145.00**

TOTAL **\$1145.00**

Balance Due \$1145.00

Retainer Amount Remaining

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

Statement of Limited Liability and Financial Responsibility

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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
08/01/2024	08/31/2024	56065	\$0.00	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

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
1	08/01/2024		E-Hounds Review Platform Add'l Users (per user) dzamorano@yipcpa.com		\$150.00	\$150.00
1	08/01/2024		E-Hounds Review Platform (incl 1 user seat) myip@yipcpa.com		\$995.00	\$995.00

All balances are due upon receipt. Thank you!

SUBTOTAL **\$1145.00**

Payments Applied	
Sep 3, 2024 Retainer Applied	\$1145.00

TOTAL **\$1145.00**

Balance Due \$0.00

Retainer Amount Remaining **\$0.00**

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

Statement of Limited Liability and Financial Responsibility

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