

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,)
)
Plaintiff,)
)
v.)
)
GLOBAL ACCESS TECHNICAL)
SUPPORT LLC, *et al.*)
)
Defendants.)

Case No. 4:16-cv-01556-HEA

**RECEIVER’S APPLICATION FOR ALLOWANCE AND
PAYMENT OF FEES AND EXPENSES INCURRED BY THE
RECEIVER, RETAINED COUNSEL, AND OTHER PROFESSIONALS**

Receiver Claire M. Schenk, in her capacity as receiver (“Receiver”) for Defendants Global Access Technical Support LLC (“GATS”), Global sMind LLC (“Global sMind”), Source Pundit LLC (“Source Pundit”), and Helios Digital Media LLC (“Helios”) (collectively, the “Receivership Defendants”), files her *Application for Allowance and Payment of Expenses Incurred by the Receiver, Counsel, and Other Professionals* (the “Application”).

The Receiver requests that this Court (1) find that, for this Application, the total professional fees and costs incurred during the initiation of this matter through October 31, 2016 (the “Application Period”) are reasonable and appropriate; and (2) enter an Order¹ authorizing the Receiver to make payments for certain professional services and expenses incurred during the Application Period. The Receiver submitted the Application to the United States Federal Trade Commission (the “FTC” Or “Commission”) for review and approval prior to submission to the Court. The Commission has no objection to the Application. A summary of Receivership

¹ A proposed order is attached hereto as **Exhibit D**.

funds may be found in Exhibit A.

The Receiver respectfully requests that the Court authorize the Receiver to pay reasonable fees and costs incurred by the following retained professionals: (a) Thompson Coburn LLP (“Thompson Coburn”), the Receiver’s primary counsel; (b) Segue Partners, LLC (“Segue”), the Receiver’s bookkeeper; and (c) CliftonLarsonAllen LLP (“CLA”), the Receiver’s accountant, tax preparer, forensics and valuation expert.

I. RETENTION OF RECEIVER, DISCLOSURE OF COMPENSATION, AND ACTIVITIES OF RECEIVER DURING APPLICATION PERIOD

On October 3, 2016, the FTC filed its Complaint and Memorandum in Support of Motion for Temporary Restraining Order. Complaint (Dkt. No. 1); Memorandum (Dkt. No. 6). On October 4, 2016, following a hearing, the Court granted the FTC’s motion and entered the Temporary Restraining Order with Asset Freeze, Appointment of a Receiver, Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue (“Order”). Order (Dkt. No. 10). The Receiver’s authority, duties, and obligations are set forth in the Order. The FTC’s motion and the Court’s appointment were based upon the Receiver’s proposal to the FTC (the “Proposal”). The Proposal set out the qualifications of the Receiver and the support to be received from Thompson Coburn as primary counsel to the Receiver. Additionally, the Proposal fully disclosed the proposed compensation schedule and course of action contemplated by the Receiver. Memorandum by FTC (Dkt. No. 6, Exhibit 13).

Pursuant to the Order, the overall function of the Receiver is to: administer and manage the business affairs and assets of the Receivership Defendants, conserve, hold and manage all of the assets of the Receivership Defendants, and take such actions as are necessary to protect the interests of consumers and creditors who have transacted business with the Receivership Defendants. Order at 14-15 (Dkt. No. 10.) In furtherance of these objectives, the Order

empowers the Receiver to “choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable and necessary in the performance of duties and responsibilities under the authority granted by this Order.” Order at 16 (Dkt. No. 10). The Order also empowers the Receiver to “[c]ontinue and conduct the business of the Receivership Defendants in such manner, to such extent, and for such duration as the Receiver may in good faith deem to be necessary or appropriate to operate the business profitably and lawfully.” *Id.*

Pursuant to these authorities, and in keeping with section VII.G of the Order, the Receiver now files this Application for the Application Period, along with the requisite supporting documentation. Submission of this Application is also supported by the information stated in the Receiver’s First Interim Status Report (“Status Report”) which was filed on December 1, 2016 and includes activity through November 30, 2016. This report includes descriptions of proposals, fee arrangements, and retainer agreements for the service professionals providing support to the Receiver for the benefit of the Receivership estate. *See* Status Report (Dkt. No. 58).

The activities of the Receiver are guided by the Order, which requires the Receiver to, among other things: (i) assume full control of the Receivership Defendants; (ii) take exclusive custody, control, and possession of all assets and documents of, or in the possession custody, or under the control of, the Receivership Defendants, wherever situated; (iii) take possession of and secure all areas of the business premises of the Receivership Defendants; (iv) conserve, hold, and manage all receivership assets, and perform all acts necessary or advisable to preserve the value of those assets, in order to prevent any irreparable loss, damage, or injury to consumers or to creditors of the Receivership Defendants; (v) enter into contracts and purchase insurance; (vi)

prevent inequitable distribution of assets and determine, adjust, and protect the interests of consumers and creditors; and (vii) manage and administer the business of the Receivership Defendants, among other duties. *See* Order at 14-15 (Dkt. No. 10).

Thus, as outlined in the Status Report, with the assistance of the personnel described above, the Receiver has: (i) taken custody of Receivership property located at three separate locations on the day following her appointment; (ii) arranged for the orderly transfer of electronic data and documents to the offices of the Receiver while continuing to pursue the production of additional information from various sources; (iii) begun to review and organize the electronic and hard copy documents which consist of at least 20,000 pages all of which are hosted by the Receiver's counsel without the assistance or associated cost of an outside vendor; (iv) transferred the site of the Receivership Defendants' business locations to the Receiver's offices, filing such notices as are appropriate with the Postal Service, *e.g.*, change of address cards and the Internal Revenue Service, *i.e.*, Form 56, providing notice of the Receivership; (v) terminated and set aside a lease agreement for an unnecessary office location; (vi) secured jurisdiction through filing 28 U.S.C. § 754 notices with the appropriate district courts and gathered and consolidated all known assets of the Receivership estate into accounts at East West Bank, in particular, the funds held in the bank accounts of the Receivership Defendants and the funds held in reserve by the various merchant processors for the Receivership Defendants; (vii) terminated all known managers and direct agents of the Receivership Defendants; (viii) retained Segue to assist with bookkeeping and other "Back Office" functions and CLA to assist with tax issues and the preparation of the necessary returns; (ix) learned, transitioned and managed the business interests of Receivership Defendant Source Pundit, LLC while assessing its ability to continue as an operating entity under the requirements of the Order, in particular, reviewing its

operations and determining that they did not involve prohibited activity and that the business appears to be legitimate and operate at a profit; (x) performed a similar review process for the remaining three Receivership Defendants while concluding that such entities could not continue pursuant to those same provisions of the Court Order; (xi) created a widely disseminated press release for the benefit of consumers and creditors while establishing and hosting a publicly available website for the benefit of all interested parties; (xii) protected consumers by taking control of the Receivership Defendants' websites and redirecting consumers to the Receiver; and (xiii) advanced expenses for filing and other fees for the benefit of the Receivership estate before monies were turned over to the Receiver.

II. REQUEST FOR FEES AND EXPENSES

The Receiver, her counsel and accountants worked diligently to marshal and preserve all assets of the Receivership Defendants, investigate their business operations, and compile information that the Receivership Defendants may use to pursue the Receiver's claims in litigation. The Receiver worked to recover funds, to investigate claims-related matters, and handled the business interests of the Receivership Defendant Source Pundit. As described above, during the reporting period, the Receiver collected Receivership assets and took such actions as were required pursuant to the Order to protect the interests of defrauded consumers and creditors.

Thus, the Receiver respectfully requests an award for legal and other professional fees and the reimbursement of certain expenses incurred on behalf of the Receiver for services rendered during the Application Period, as well as a finding that these legal and professional fees and costs are reasonable and appropriate. These amounts total \$56,791.60 in the aggregate (the "Total Award"). The Total Award is comprised of: (a) \$55,774.60 in legal fees and costs for

Thompson Coburn, the Receiver's primary counsel; (b) \$544.50 in professional fees for Segue, the Receiver's bookkeeper; and (c) \$472.50 in professional fees for CLA, the Receiver's accountant, tax preparer, forensics and valuation expert.

Significantly, the Receiver and many of the professionals working with her performed services at deeply discounted rates. Importantly, the Receiver did not impose a fee for hosting a voluminous database of documents pertaining to the Receivership or for the costs associated with the integration of new documents into counsel document management system. Also, the informational website created and updated by the Receiver's firm continues to be available to the public without cost to the Receivership Defendants. The Receiver's website, which includes an informational notice to consumers seeking redress, serves as an economical and secure way of providing information to the consumers and creditors.² Additionally, Thompson Coburn's October invoice did not include charges for significant amounts of work performed at the firm, including research particular to this type of Receivership and various administrative tasks which were performed by paralegals or associates due to the press of time in securing assets and the initial and immediate need for the performance of critical Receivership duties.

This request is the Receiver's first application to the Court for compensation and reimbursement of expenses for services rendered on behalf of the Receiver. In support of the efforts performed on behalf of the Receiver, the Receiver has attached exhibits to her Application consisting of:

Exhibit A: A summary of Receivership bank accounts

Exhibit B: Summaries of professional and paraprofessional time and rates

Exhibit C: Individualized and detailed invoices of all services rendered, expenses, and

² Third-party vendors are often utilized by other receivers and attorneys for the functions described in this paragraph, and that utilization of vendors often results in substantial costs to the receivership entities.

disbursements for Thompson Coburn, Segue and CLA

Exhibit D: Proposed order

Exhibit B contains an aggregate summary of all hours and fees of all professionals and paraprofessionals who provided services to the Receiver during the Application Period. The total amount represents the amount of time expended by each attorney, paralegal, and professional multiplied by the applicable discounted hourly rate. **Exhibit C** contains individualized and detailed invoices of the daily services rendered and the hours expended by the various attorneys, paralegals, and professionals employed on behalf of the Receiver in this case during the Application Period. **Exhibit C** is based on, among other information, the contemporaneous daily time records maintained by the Receiver's attorneys, paralegals, and professionals who rendered services in this case.³ The Receiver reviewed and approved these time records, and based on the complexity of the case, the Receiver respectfully submits that the requested compensation is reasonable.

III. MEMORANDUM OF LAW IN SUPPORT OF REQUEST

Under governing law pertaining to equity based receiverships in the Eighth Circuit, following a determination that services were rendered and costs expended in furtherance of the Receivership, the Court may award compensation for the presented fees and costs. When determining an award of attorneys' fees, the Court should use the lodestar method of multiplying the number of hours reasonably expended by the reasonable hourly rate. *U.S. SEC. & Exch. Comm'n v. Petters*, No. 09-1750 ADM/JSM, 2009 WL 3379954, at *3 (D. Minn. Oct. 20, 2009) (citing *Fish v. St. Cloud State Univ.*, 295 F.3d 849, 851 (8th Cir. 2002)); *see also FTC v. Capital*

³ Certain redactions to these records have been made because of the confidential nature of the information. For example, personal identifiers and confidential business information were redacted. The original, unredacted records are available at the request of the Court for an in camera review.

Acquisitions & Mgmt. Corp., No. 04 C 7781, 2005 WL 3676529 (N.D. Ill. Aug. 26, 2005) (internal citation omitted) (“Provided the application contains sufficient descriptive detail, the fee produced by the resulting lodestar calculation will, presumptively, be a reasonable one. Absent evidence to the contrary, the presumption of reasonableness should be respected and the fee generated by the lodestar calculation should be the fee awarded.”). A reasonable hourly rate is the ordinary fee for similar work in the community. *Petters*, 2009 WL 3379954, at *3 (quoting *Avalon Cinema Corp. v. Thompson*, 689 F.2d 137, 140 (8th Cir. 1982)); *see also Fish*, 295 F.3d at 851 (“A reasonable hourly rate is usually the ordinary rate for similar work in the community where the case has been litigated.”). This Court has approved hourly rates for similar work in previous Receivership cases. *See* Memorandum and Order, *FTC v. Neiswonder, et al*, No. 96-CV-2225 (E.D. Mo. Mar. 30, 2007), ECF No. 112; Memorandum and Order, *SEC v. Burton Douglas Morriss, et al.*, No. 12-CV-80 (E.D. Mo. Sept. 20, 2012), ECF No. 199. The Receiver respectfully suggests that for the reasons stated herein, because the Receiver and her counsel’s rates were previously submitted to the Court prior to her appointment and based upon the background information regarding rates and qualifications set forth in the Proposals and the Interim Status Report, this request for fees for payment of the Receiver’s attorneys and other professionals meets the criteria for this interim compensation.

In this case, the Court’s Order directs and authorizes the Receiver to “[m]anage and administer the business of the Receivership Defendants until further order of this Court by performing all incidental acts that the Receiver deems to be advisable or necessary, which includes retaining, hiring, or dismissing any employees, independent contractors, or agents.” Order at 15 (Dkt. No. 10). The Order allows the Receiver to: (i) “choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as

the Receiver deems advisable and necessary in the performance of duties and responsibilities under the authority granted by this Order” (Order at 16 (Dkt. No. 10)); and (ii) “[m]ake payments and distributions from the receivership estate that are necessary and advisable for carrying out the directions of, or exercising the authority granted by, this Order” (*id.*). The Court further authorized payment of the Receiver’s counsel from the funds held by the Receivership and entitled the Receiver and all authorized personnel hired by the Receiver “to reasonable compensation for the performance of duties pursuant to [the] Order and for the cost of actual out-of-pocket expenses incurred by them, from the assets now held by, or in the possession or control of, or which may be received by the Receivership Defendants.” Order at 22-23 (Dkt. No. 10).

The Receiver’s attorneys, paralegals, accountants, and other professionals have incurred reasonable fees and costs consistent with the Court’s orders, and payment is appropriate and warranted in consideration under applicable Eighth Circuit case law.

WHEREFORE, the Receiver respectfully requests that this Court enter the Order submitted herewith and marked as **Exhibit D**:

- (i) finding that the Total Award is reasonable and appropriate;
- (ii) authorizing an award of fees and costs in the amount of \$56,791.60;

(iii) directing the Receiver to make payments as follows based upon the authority submitted by the Receiver in support of this Application and allowing payment to be made from any one or more of the accounts listed on **Exhibit A**: (a) \$55,774.60 in legal fees and costs for Thompson Coburn; (b) \$544.50 in professional fees for Segue; and (c) \$472.50 in professional fees for CLA; and (iv) providing for such other relief as is appropriate under the circumstances.

Dated: December 2, 2016

Respectfully Submitted,

THOMPSON COBURN LLP

By /s/ Emilee L. Hargis
Stephen B. Higgins, #25728MO
Emilee L. Hargis, #69119MO
One US Bank Plaza
St. Louis, Missouri 63101
Phone: (314) 552-6000
Fax: (314) 552-7000
shiggins@thompsoncoburn.com
ehargis@thompsoncoburn.com

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2016, I electronically filed the foregoing with the Clerk of the Court through the Court's system to be served by operation of the Court's CM/ECF system to all counsel of record.

/s/ Emilee L. Hargis

Bank	Account #	Company	Amount	Status
Central Bank	xxxxx1540	Global Access Technical Support LLC	\$ 4,365.09	Transferred
Central Bank	xxxxx5774	Global Smind LLC	\$ 1,900.92	Transferred
Central Bank	xxxxx2983	Global Smind LLC	\$ 1,353.46	Transferred
Central Bank	xxxxx7306	Global Smind LLC	\$ 562.51	Transferred
Commerce Bank	xxxxxx6677	Global Access Technical Support LLC	\$ 473.92	Transferred
Commerce Bank	xxxxxx1005	Global Access Technical Support LLC	\$ -	N/A
Commerce Bank	xxxxxx9953	Global Access Technical Support LLC GATS Reserves	\$ 87,673.83	Transferred
Commerce Bank	xxxxxx3368	Global Access Technical Support LLC GATS - VGBl	\$ 25,001.02	Transferred
Commerce Bank	xxxxxx0472	Global Access Technical Support LLC dba Wizard Squad	\$ 1,218.28	Transferred
Commerce Bank	xxxxx7880	Global Access Technical Support LLC Reserves	\$ 156.86	Transferred
Commerce Bank	xxxxxx3716	Global Access Technical Support LLC	\$ 2,721.27	Transferred
Commerce Bank	xxxxxx0626	Global sMind LLC	\$ -	N/A
Commerce Bank	xxxxxx7909	Global sMind LLC	\$ 613.59	Transferred
Commerce Bank	xxxxxx8554	Helios Digital Media	\$ 12,612.13	Transferred
Commerce Bank	xxxxxx8958	Source Pundit LLC	\$ 53,300.38	Transferred
Carrollton Bank	xxxxx4003	Global sMind LLC Operating Account	\$ 1,838.05	Transferred
Carrollton Bank	xxxxx4135	Global sMind LLC Merchant Account	\$ 1,725.76	Transferred
Carrollton Bank	xxxxx4127	Global sMind LLC Reserve Account	\$ 10.00	Transferred
Evo Payments	mx4180	Global Access Technical Support LLC (Merchant Acct)	\$ 62.75	Transferred
Evo Payments	mx8286	Global Access Technical Support LLC (Merchant Acct)	\$ 2,859.58	Transferred
PaySafe	mx2463	Global Access Technical Support LLC (Merchant Acct)	\$ 11,771.56	Transferred
Clearent	mx8807	Global Smind LLC (Merchant Acct)	\$ 5,886.74	Transferred
Humboldt Merchant Services	x2885	Global Access Technical Support LLC (Merchant Acct)	\$ 2,710.57	Transferred
ClaimsXpress Group		Global Access Technical Support LLC (Merchant Acct)	\$ 35,069.64	Transferred
First Community Credit Union	xxxxxx6885	Source Pundit LLC	\$ 18,031.98	Transferred
PNC Bank	x3086	Helios Digital Media	\$ 101.00	Transferred
		TOTAL	\$ 272,020.89	



Exhibit A


 One US Bank Plaza
St. Louis, MO 63101

 314 552 6000 main
314 552 7000 fax
thompsoncoburn.com

Summary of Professional and Paraprofessional Time and Rates

The Receiver – Thompson Coburn LLP

Receiver	Reduced Hourly Rate	Time Expended	Total
E. Hargis	\$178.71	43.0	\$7,684.43
S. Higgins	\$278.00	9.2	\$2,557.65
J. Muzzarelli	\$156.99	59.8	\$9,387.83
C. Schenk	\$429.25	82.0	\$35,198.50
TOTAL FEES			\$54,828.40
Disbursements			946.20
TOTAL		194.0	\$55,774.60

Bookkeeping Services – Segue Partners

Professional	Reduced Hourly Rate	Time Expended	Total
J. Branham	\$54.00	1.5	\$81.00
L. McDonald	\$193.50	1.0	\$193.50
M. Murray	\$270.00	1.0	\$270.00
TOTAL FEES		3.5	\$544.50

Exhibit B

Accounting Services – CliftonLarsonAllen LLP

Professional	Reduced Hourly Rate	Time Expended	Total
T. O'Shaughnessy	\$315.00	1.5	\$472.50
TOTAL FEES		1.5	\$472.50

GRAND TOTAL FEES \$55,845.40
 Disbursements \$ 946.20

GRAND TOTAL Fees & Disbursements \$56,791.60



Remit To:
P.O. Box 18379M
St. Louis, Missouri 63195

November 29, 2016
Invoice #3201470

ACH Instructions: (Not for Wire Transfer)
Account Name: Thompson Coburn LLP
Bank: U.S. Bank
ABA/Routing Number: 021052053
Account Number: 25657335
Please reference invoice number(s).

U.S. District Court Eastern District of Missouri
Attn: Hon. Henry E. Autrey
Thomas F. Eagleton Courthouse
111 S. 10th Street
3rd Floor
St. Louis, Missouri 63102

For Wire Transfer Instructions or Other
Communications Please Contact:
One US Bank Plaza
St. Louis, Missouri 63101-1693
314-552-6000
AccountsReceivable@ThompsonCoburn.com

TIN 43-0666662

For Legal Services Rendered in Connection With:
Global Access Technical Support LLC
TC File: 54464 / 159257

Date	Atty	Description	Phase	Task	Hours
09/23/16	C. Schenk	Telephone conference with L. Scott to prepare for seizure of Receivership assets	L100	L190	0.70
09/27/16	C. Schenk	Review account information supplied by FTC, outline list of banks to contact, review state filings and list jurisdictions for 754 filings	L100	L190	0.40
09/28/16	C. Schenk	Telephone conference with investigator and develop 754 information	L100	L190	0.30
09/30/16	J. Muzzarelli	Discuss anticipated assistance for case with C. Schenk	L100	L120	0.10
09/30/16	J. Muzzarelli	Review draft complaint and motion for temporary restraining order	L100	L120	0.30
09/30/16	C. Schenk	Communications with L. Smith, prepare for 754 filings and other activity	L100	L190	0.40
10/03/16	C. Schenk	Meet with L. Scott regarding filing, allegations and task list (.8); review allegations of declaration (.7)	L100	L190	1.50
10/04/16	E. Hargis	Scrutinize order for preparation of case narrative and documents checklist	L200	L250	1.20
10/04/16	E. Hargis	Edit termination letters for named defendants	L100	L120	0.80
10/04/16	E. Hargis	Attend operations meeting and meet with FTC attorneys concerning document availability for receivership entities	L100	L120	3.00

Invoice

Exhibit-C

November 29, 2016

Invoice #3201470

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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/04/16	E. Hargis	Report to C. Schenk re termination letters and checklist for search day	L100	L190	0.20
10/04/16	E. Hargis	Draft two termination letters for defendants and draft checklist	L100	L120	1.30
10/04/16	E. Hargis	Call various locksmiths and find availability for use after search of two business addresses	L100	L190	0.20
10/04/16	J. Muzzarelli	Review, analyze and organize documents filed under seal	L100	L110	0.60
10/04/16	C. Schenk	Communications with FTC re court proceedings, review executed order	L100	L190	0.80
10/04/16	C. Schenk	Review updates re accounts and tax IDs	L100	L190	0.30
10/04/16	C. Schenk	Attend meeting at FBI re defendant, summarize notes	L100	L190	1.50
10/04/16	C. Schenk	Meet with FTC to discuss next steps and outline same	L100	L190	1.40
10/04/16	C. Schenk	Develop termination letters to serve on Chhatwal and Kaur	L100	L190	0.90
10/04/16	C. Schenk	Coordinate website with CTS and control of websites	L100	L120	0.30
10/04/16	C. Schenk	Communications with EWB re new accounts and develop information for same	L100	L190	0.30
10/04/16	C. Schenk	Begin to develop investor communication and website	L100	L190	0.20
10/04/16	C. Schenk	Develop 754 filings, review information pertaining to assets	L100	L120	0.80
10/04/16	C. Schenk	Develop information for filing of Form 56	L100	L120	0.50
10/04/16	C. Schenk	Review declaration and approximately 700 pages of exhibits	L100	L120	1.90
10/05/16	E. Hargis	Accompany FBI and FTC on search of several defendant locations to collect documents and other business information	L300	L390	9.50
10/05/16	E. Hargis	Organize handwritten notes from search into list of factual information and document locations and develop master to-do list for receivership	L100	L120	1.50
10/05/16	J. Muzzarelli	Review emails re search and review of documents at FBI's office, termination letters for defendants and court order appointing receiver	L100	L190	0.90

Invoice

DUPLICATE OF ORIGINAL

November 29, 2016

Invoice #3201470

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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/05/16	C. Schenk	Meet to prepare for service of papers and interview of R. Chhatwal, prepare for same	L100	L190	3.90
10/05/16	C. Schenk	Approve final 754s	L100	L120	0.20
10/05/16	C. Schenk	Travel to business premises of Global sMind to secure documents and relevant business information, coordinate information and production of same with R. Kaur, through counsel	L100	L190	2.80
10/06/16	E. Hargis	Report to J. Muzzarelli re search event occurrences, documents received, and further steps towards information gathering	L100	L190	0.20
10/06/16	E. Hargis	Organize handwritten notes into narrative of search events	L100	L120	0.30
10/06/16	E. Hargis	Report to C. Schenk re accountant turnover letters and call to R. Chhatwal	L100	L190	1.10
10/06/16	E. Hargis	Draft accountant turnover letters	L100	L120	0.50
10/06/16	E. Hargis	Finalize accountant turnover letters and construct chart of all contracted parties	L100	L120	0.30
10/06/16	E. Hargis	NO CHARGE Construct chart of all contracted parties	L100	L120	0.40
10/06/16	E. Hargis	Draft Global sMind employee turnover letter and convert all finalized letters into PDFs	L100	L120	0.30
10/06/16	A. Konstantinovich	NO CHARGE Review initial filings and prepare entry of appearance	L200	L210	0.50
10/06/16	J. Muzzarelli	Meet with E. Hargis re review of conversations and searches conducted	L100	L110	0.20
10/06/16	C. Schenk	Multiple communications with FTC re status of proceeding and review information from same	L100	L190	0.80
10/06/16	C. Schenk	Prepare notice and turn over letter to J. Rosen and B. Bali, communications with same	L100	L190	0.80
10/06/16	C. Schenk	Review proposal from Segue Capital and communications with same	L100	L190	0.60
10/06/16	C. Schenk	Communications with G. Adams re bond	L100	L190	0.20
10/06/16	C. Schenk	Prepare notice letter to M. Meinzen	L100	L190	0.40
10/06/16	C. Schenk	Develop 754 filings	L100	L190	0.50
10/06/16	C. Schenk	Analyze obligations under court order and obligations pertaining to same	L100	L120	0.80

*Invoice**Blumenthal Law Firm, LLP*

November 29, 2016

Invoice #3201470

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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/06/16	C. Schenk	Telephone conference and other communications with J. Crow	L100	L190	0.40
10/06/16	C. Schenk	Develop information for new accounts	L100	L120	0.40
10/06/16	C. Schenk	Seek advice of counsel re order and PI hearing	L100	L190	0.40
10/07/16	E. Hargis	Report to C. Schenk re instructions to draft email to Chhatwal concerning new representation and order requirements	L100	L190	0.10
10/07/16	E. Hargis	Draft email to Chhatwal requesting identification of counsel	L100	L190	0.10
10/07/16	E. Hargis	Summarize call from R. Chhatwal	L100	L190	0.30
10/07/16	E. Hargis	Summarize receivership responsibilities	L100	L190	0.10
10/07/16	E. Hargis	NO CHARGE Research receivership's role in defending receiver entity lawsuits in FTC actions	L100	L120	1.20
10/07/16	E. Hargis	Draft email to opposing counsel to request communication with Chhatwal	L100	L190	0.20
10/07/16	E. Hargis	Respond to accountant email concerning order and turn over request	L100	L190	0.20
10/07/16	C. Schenk	Telephone conference with L. Scott (.4); prepare communications to R. Chhatwell and coordinate with E. Hargis re same and regarding B. Bali (.4)	L100	L190	0.80
10/09/16	E. Hargis	NO CHARGE Research re receivership's role in defending receiver entity lawsuits in FTC actions	L100	L120	2.00
10/09/16	C. Schenk	Review and prepare communication to E. Reid (.2); multiple communications with the FTC re documents, new entity, Digicare and account information needed (.6); communications with J. Crow (.3)	L100	L190	1.10
10/10/16	E. Hargis	Conference with C. Schenk re receiver role in FTC suit	L100	L190	0.20
10/10/16	E. Hargis	NO CHARGE Arrange courier to retrieve mail from 10756 Trenton Ave.	L100	L120	0.10
10/10/16	E. Hargis	Research Technocare role and report to C. Schenk and follow-up re Trenton location	L100	L120	0.20
10/10/16	E. Hargis	Call to accountant B. Bala	L100	L190	0.40
10/10/16	E. Hargis	NO CHARGE Report to S. Higgins re receiver's role in FTC receivership matter	L100	L190	0.10

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Date	Atty	Description	Phase	Task	Hours
10/10/16	E. Hargis	Telephone call to defendant Chhatwal re further steps that must be taken and confirmation on counsel retention	L100	L190	0.30
10/10/16	E. Hargis	Identify official locations for Helios and Source Pundit and retrieve and file mail from GATS	L100	L120	0.30
10/10/16	E. Hargis	NO CHARGE Research receiver role in FTC cases	L100	L120	0.80
10/10/16	E. Hargis	Telephone conference with defendant Chhatwal	L100	L190	0.80
10/10/16	E. Hargis	Report to C. Schenk re receiver role research, receiver report for Friday hearing and to-do list additions	L100	L190	0.20
10/10/16	S. Higgins	Review filed pleadings	L200	L210	0.40
10/10/16	S. Higgins	Review and respond to emails with C. Schenk re filing	L200	L210	0.40
10/10/16	C. Schenk	Seek advice of S. Higgins re TRO (.3); communications with FTC regarding same (.2); telephone conference with accountant for Global sMinds re document turn over (.3); attention to bond, 754s and form 56 (.4); coordinate re documents with FTC (.3); communication with accountants re potential services (.2); review summary of information and questions prepared by R. Chhatwell (.3); gather and review forms to finalize for new bank accounts (.4); communication with J. Crow and analyze import of same (.4)	L100	L190	2.80
10/11/16	E. Hargis	NO CHARGE Report re alternative avenues for researching receivership role in FTC action	L100	L190	0.30
10/11/16	E. Hargis	NO CHARGE Telephone call to Westlaw research assistant re receivership role in FTC action	L100	L190	0.20
10/11/16	E. Hargis	Update notes to reflect October 10 telephone calls and report to C. Schenk on research	L100	L190	0.50
10/11/16	E. Hargis	NO CHARGE Follow-up on library sources for receivership role in FTC action	L100	L120	0.30

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Date	Atty	Description	Phase	Task	Hours
10/11/16	E. Hargis	Review voice message from E. Scott	L100	L190	0.10
10/11/16	E. Hargis	Compile notes from week of October 3 and compile master contract list	L100	L120	0.50
10/11/16	E. Hargis	Telephone call from S. Furst re mail and continue to compile narrative for receiver report use	L100	L190	0.50
10/11/16	E. Hargis	Coordinate for mail pick-up and address change and compile list of other locations and schedule document review for FBI	L100	L120	0.30
10/11/16	S. Higgins	Exchange emails with C. Schenk relative to status of receivership	L200	L210	0.30
10/11/16	S. Higgins	Review additional pleadings	L200	L210	0.30
10/11/16	S. Higgins	Emails re hearing with FTC	L200	L210	0.20
10/11/16	C. Schenk	Review questions prepared by R. Chhatwal and respond to same (.4); communications with potential accountant re services for tax and related matters (.6); communications with East West Bank re new accounts (.2); seek advice of S. Higgins re PI hearing and related filings, review same, analyze receivership authority pertaining to order (.9); attention to collection of documents, communications with FBI and accountant (.8); review new order re unsealing (.1); develop website information for consumers and announcement regarding same (.7); follow up with xpressdrafts re moneys for GATS deposit (.3); finalize filing re bond (.3); finalize form 56 (.3); communications with FTC regarding documents and proceedings (.5); communications with Commerce Bank and follow up re accounts with same (.4)	L100	L120	5.50
10/12/16	E. Hargis	Attention to document management	L100	L190	0.20
10/12/16	E. Hargis	Edit press release	L100	L120	0.20
10/12/16	E. Hargis	NO CHARGE Schedule document review with FBI	L100	L190	0.10
10/12/16	S. Higgins	Emails to and from C. Schenk, opposing counsel and FTC re extension of TRO hearing	L200	L210	0.50
10/12/16	S. Higgins	Telephone call with C. Schenk	L200	L210	0.10

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Date	Atty	Description	Phase	Task	Hours
10/12/16	A. Konstantinovich	NO CHARGE Review and respond to emails and telephone calls from reporters requesting comment on case	L100	L190	0.60
10/12/16	A. Konstantinovich	NO CHARGE Telephone conference with court to resolve issue with entry of appearance	L100	L190	0.20
10/12/16	J. Muzzarelli	Review and analyze emails and documents received from R. Chhatwal, V. Jain and B. Bala in preparation for review of documents pulled during FBI search	L100	L120	2.30
10/12/16	J. Muzzarelli	NO CHARGE Telephone conference with P. Rockers at FBI office re setting time for review of documents	L100	L120	0.10
10/12/16	C. Schenk	Communications with J. Muzzarelli and E. Hargis re gathering documents and assets (.5); multiple communication with government regarding access to documents (.2); communications with FTC and counsel regarding preparation for PI hearing scheduled for Friday (.3); review stipulation (.3); develop public communication and website (.5); review account information, work on transfers (.5); develop information re lease at Trenton property, develop plan to handle related issues (.6); finalize change of address information (.3); follow up with CLA re accounting services (.2)	L100	L190	3.40
10/13/16	E. Hargis	Organize correspondence and add notices to the master list	L100	L120	0.20
10/13/16	E. Hargis	Report to C. Schenk re accountant information and document search	L100	L190	0.10
10/13/16	E. Hargis	Search documentation for 2015 K-1s for Global sMinds and report to C. Schenk on status; correspond with B. Bala	L100	L120	0.40
10/13/16	E. Hargis	Organize correspondence and add notices to compose to the master list	L100	L120	0.40
10/13/16	E. Hargis	Review physical documents from FBI search for immediate defendant entity concerns	L100	L120	2.60

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Date	Atty	Description	Phase	Task	Hours
10/13/16	E. Hargis	Email accountant concerning 2015 amended tax return filing	L100	L190	0.20
10/13/16	E. Hargis	Coordinate document scanning and retrieval; call to FBI contact and report to C. Schenk for final decision	L100	L120	0.40
10/13/16	E. Hargis	Attention to document management	L100	L190	0.30
10/13/16	E. Hargis	Reply to the FBI/USAO re production	L100	L190	0.10
10/13/16	E. Hargis	Respond to accountant re production	L100	L190	0.10
10/13/16	S. Higgins	Review and respond to emails relative to hearing and proposed motion to extend	L200	L230	0.50
10/13/16	J. Muzzarelli	Review and analyze emails and documents received from third parties and R. Chhatwall	L100	L110	2.80
10/13/16	J. Muzzarelli	Travel to United States Attorney's Office and review documents seized by the FBI	L100	L110	1.20
10/13/16	J. Muzzarelli	Telephone call to K. Joyner at ClaimsXpress Group re cashier's check and report to C. Schenk	L100	L110	0.20
10/13/16	J. Muzzarelli	Download documents from FTC secure email	L100	L110	0.20
10/13/16	C. Schenk	Communications with T. O'Shaughnessy and defendants regarding tax obligations (.6); develop engagements for Segue and CLE (.4); review and respond to communication from R. Chhatwal re frozen accounts (.2); oversee new deposit (.2); finalize additional 754s (.2); attention to document collection from government (.3); prepare update for oral presentation by S. Higgins at PI hearing re receivership (.3)	L100	L190	2.20
10/14/16	E. Hargis	NO CHARGE Gather all turnover letters for file	L100	L120	0.10
10/14/16	E. Hargis	NO CHARGE Determine the Helios address and proper mail forwarding information	L100	L120	0.10
10/14/16	E. Hargis	Draft correspondence with █████ bank and draft correspondence with landlord	L100	L190	0.60
10/14/16	S. Higgins	Organize materials for hearing	L200	L250	0.30
10/14/16	S. Higgins	Emails to FTC relative to hearing and rescheduling of hearing	L200	L250	0.30

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Date	Atty	Description	Phase	Task	Hours
10/14/16	J. Muzzarelli	Confirm receipt of cashier's check from Claimsxpress for GATS	L100	L190	0.10
10/14/16	J. Muzzarelli	Coordinate with EastWest Bank to process cashier's check from Claimsxpress for GATS	L100	L190	0.20
10/14/16	J. Muzzarelli	Draft letter to R. Khanverdi at East West Bank forwarding cashier's check from ClaimsXpress for GATS account	L100	L190	0.30
10/14/16	J. Muzzarelli	Review turnover letters to third parties and make checklist of materials requested to confirm receipt	L100	L190	0.60
10/14/16	J. Muzzarelli	Coordinate set up of secure file transfer for J. Rosen's use in transmitting documents requested by receiver	L100	L190	0.30
10/14/16	J. Muzzarelli	Review, document and analyze documents received from various parties	L300	L390	3.10
10/14/16	C. Schenk	Attention to Clams Xpress deposit (.2); communications with M. Mosley (.2); communication with E. Reid regarding tax obligations (.2)	L100	L190	0.60
10/15/16	C. Schenk	Communication with accountant, J. Rosen	L100	L190	0.10
10/17/16	E. Hargis	Report to C. Schenk re Chhatwal correspondence, tax filings, document retrieval, and tasks to be accomplished	L100	L190	0.40
10/17/16	J. Muzzarelli	Review email and documents received from J. Rosen re Source Pundit and GATS	L300	L390	1.20
10/17/16	J. Muzzarelli	Work on contact list and frozen account information for bank account transfers to follow-up	L100	L110	1.20
10/17/16	J. Muzzarelli	Review documents received from FTC	L100	L110	0.60

*Invoice**Invoice to the Client Receipt*

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Date	Atty	Description	Phase	Task	Hours
10/17/16	C. Schenk	Telephone conference with DOJ attorney, R. Finneran re access to documents (.3); telephone conference with E. Dowd re accounting issues (.1); follow up to seek advice of counsel, S. Higgins (.2); attention to document collection (.3); attention to accounts and transfers of same, follow up with M. Mosley and with L. Urban (.5); review CLA proposal and update engagement letter, follow up with same (.8); work on Segue engagement (.4); review incoming mail, in particular, charge backs (.3); review return documents from 754 filings (.2); review website design and authorize site to go live (.3); review R. Chhatwal summary of Receiver document requests for comment and follow up (.2)	L100	L190	3.60
10/18/16	J. Muzzarelli	Review email exchanges with L. Urban, counsel for Commerce Bank re incoming wire and outgoing wires to contractors	L100	L190	0.30
10/18/16	J. Muzzarelli	Attend conference call with L. Urban, counsel for Commerce Bank re access to accounts and instructions re incoming/outgoing wires prior to account closure	L100	L190	0.20
10/18/16	J. Muzzarelli	Review freeze summary provided by FTC and work on communications to banks, other than Commerce, re permitting receipt of incoming monies owed to receivership defendants	L100	L110	2.20

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Date	Atty	Description	Phase	Task	Hours
10/18/16	C. Schenk	Communications with J. Muzzarelli re accounts (.1); communications re accounts with Commerce Bank (.2); develop NDA for CLA (.3); finalize form of engagement letters with CLA, review proposal (.3); communications with same (.2): develop NDA (.2); finalize engagement letter with Segue and review proposal (.4); communications with same (.1); investigate use of Linked In and communications with multiple parties regarding same (.4); attention to merchant processing reserve account (.3); revise bank letter to Central Bank for account transfer (.3); develop plan regarding Trenton space (.3)	L100	L120	3.10
10/19/16	E. Hargis	NO CHARGE Retrieve court hearing date and respond to and organize correspondence	L100	L120	0.10
10/19/16	E. Hargis	NO CHARGE Receive report from J. Muzzarelli as to landlord/lease communications, communications with merchant processors, and information still needed from Chhatwal	L100	L190	0.20
10/19/16	J. Muzzarelli	Review emails with FTC	L100	L110	0.20
10/19/16	J. Muzzarelli	Exchange emails with Heather Lopez at Humboldt Merchant Services re wire transfer of monies owed to GATS	L100	L190	0.20
10/19/16	J. Muzzarelli	Receive and download asset freeze responses from J. Einikis	L100	L110	0.20
10/19/16	J. Muzzarelli	Finalize and send letter to Central Bank re transfer of bank account monies to East West Bank	L100	L190	0.80
10/19/16	J. Muzzarelli	Draft letter to Commerce Bank re transfer of bank account monies to East West Bank	L100	L190	0.80
10/19/16	J. Muzzarelli	Review freeze letter response from First Community Credit Union and draft letter re transfer of bank account monies to East West Bank	L100	L190	0.30

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Date	Atty	Description	Phase	Task	Hours
10/19/16	J. Muzzarelli	Review freeze letter response from Clearent and draft letter re transfer of merchant account monies to East West Bank	L100	L190	0.30
10/19/16	J. Muzzarelli	Review freeze letter response from PaySafe and draft letter re transfer of merchant account monies to East West Bank	L100	L190	0.30
10/19/16	J. Muzzarelli	Review freeze letter response from EVO Payments and draft letter re transfer of merchant account monies to East West Bank	L100	L190	0.30
10/19/16	J. Muzzarelli	Exchange emails with J. Rosen re tax returns needed for GATS and Source Pundit and review response and additional documents provided	L100	L190	0.30
10/19/16	C. Schenk	Review and revise notice letter to banks and provide direction to J. Muzzarelli regarding same (.3); communications with Commerce re open accounts (.2); communications with CLA re open tax issues, review communication regarding same from J. Rosen (.2); attention to Linked In accounts (.1); communication with CLA re engagement (.1)	L100	L120	0.90
10/20/16	E. Hargis	Call with J. Muzzarelli re documents needed for █████ email and status of DOJ documents	L100	L190	0.10
10/20/16	E. Hargis	NO CHARGE Call to USAO, P. Rockers and AUSA, R. Finneran re document status from FBI search	L100	L190	0.10
10/20/16	E. Hargis	Receive report from J. Muzzarelli re spreadsheet data sets, bank account information, lease information, and correspondence needed	L100	L190	0.40
10/20/16	J. Muzzarelli	Review spreadsheet from M. Moseley to confirm accounts held by receivership defendants are correctly identified and respond with formal letter requesting transfer of funds to EWB	L100	L190	0.60

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Date	Atty	Description	Phase	Task	Hours
10/20/16	J. Muzzarelli	Finalize and send letter requesting transfer of funds from First Community Credit Union to EWB	L100	L190	0.30
10/20/16	J. Muzzarelli	Begin preparing list of bank accounts for potentially related companies that may need to be included in Receivership	L100	L110	0.60
10/20/16	J. Muzzarelli	Attend telephone conference with M. Moseley and summarize conversation in email to C. Schenk re wire transfers requested	L100	L190	0.40
10/20/16	J. Muzzarelli	Exchange emails with J. Auen at Central Bank re wire transfers requested	L100	L190	0.20
10/20/16	J. Muzzarelli	Exchange emails with C. Schenk re timeline for completing wire transfers	L100	L120	0.20
10/20/16	J. Muzzarelli	Follow-up with R. Chhatwal re information/ documents not yet received	L100	L190	0.20
10/20/16	J. Muzzarelli	Review lease documents and draft letter to landlord of Trenton property	L100	L190	1.10
10/20/16	J. Muzzarelli	Draft project task list outlining upcoming tasks and assignments	L100	L120	0.60
10/20/16	J. Muzzarelli	Review and analyze bank statements from Central Bank	L100	L190	0.40
10/20/16	J. Muzzarelli	Exchange emails with J. Auen at Central Bank re funds transfers and additional documents needed, including cancelled checks and details on wire transfers	L100	L190	0.20
10/20/16	C. Schenk	Attention to account transfers and related information (.2)	L100	L120	0.20
10/21/16	E. Hargis	Report to S. Higgins re new activity on docket for GATS	L100	L190	0.10
10/21/16	C. Schenk	Review defendant Kaur declaration (.2); communication with FTC regarding information pertaining to consumer calls (.1)	L100	L120	0.30
10/24/16	C. Schenk	Communications with Commerce Bank regarding SP deposits and status of account (.2); develop notice to consumers for TC website (.2); attention to Linked In accounts and other open items (.5)	L100	L190	0.90
10/25/16	E. Hargis	Call to AUSA, R. Finneran, re documents	L100	L190	0.10
10/25/16	S. Higgins	Review and respond to emails relative to upcoming hearing	L100	L190	0.30

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Date	Atty	Description	Phase	Task	Hours
10/25/16	J. Muzzarelli	Provide asset freeze response letters received from FTC to C. Schenk for review	L100	L110	0.10
10/25/16	J. Muzzarelli	Review documents received from third parties and prepare list of documents we have related to accounting for C. Schenk in preparation for conference call with Segue Partners	L100	L190	1.10
10/25/16	J. Muzzarelli	Discuss with C. Schenk and draft email to R. Chhatwal re documents needed	L100	L190	0.70
10/25/16	J. Muzzarelli	Review and analyze lease for 10756 Trenton Avenue received from R. Chhatwal	L100	L110	0.20
10/25/16	J. Muzzarelli	Work with individuals at Commerce Bank re setting up wire transfers to contractors after receipt of money from █████ Corporation	L100	L190	0.40
10/25/16	J. Muzzarelli	Call with A. Shulusky and R. Grubbs re wire transfers to contractors	L100	L190	0.10
10/25/16	J. Muzzarelli	Attend telephone conference with M. Murray, L. McDonald, and J. Braham at Segue	L100	L190	0.90
10/25/16	J. Muzzarelli	Draft email to M. Murray at Segue re bank accounts opened at East West Bank and deposits made to date	L100	L190	0.10
10/25/16	C. Schenk	Telephone conference with M. Murray and Segue team to set up accounting systems (.9); prepare for same (.2); review and finalize additional notices re change of address for receivership entities (.3); attention to Commerce account transfers, multiple communications with same (.5); work on consumer notice and publication of same (.2); attention to document collection (.3)	L100	L190	2.40
10/26/16	E. Hargis	Call with AUSA, R. Finneran, re documents	L100	L190	0.10
10/26/16	E. Hargis	Take notes on conversation, relay information to J. Muzzarelli re document status and further steps necessary	L100	L120	0.20
10/26/16	E. Hargis	File entry of appearance in case	L200	L250	0.40

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DUPLICATE OF ORIGINAL DOCUMENT

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Date	Atty	Description	Phase	Task	Hours
10/26/16	E. Hargis	Review letter to be sent to landlord for lease termination and advise for comment	L100	L190	0.30
10/26/16	E. Hargis	Report to C. Schenk re landlord letter, status of documents and hearing Friday	L100	L190	0.20
10/26/16	E. Hargis	Work on letter to tenant and arrangement of courier to deliver letter and retrieve mail	L100	L190	0.20
10/26/16	E. Hargis	Prepare for a potential preliminary injunction hearing on Friday by reviewing docket and preliminary injunction motion	L200	L250	0.40
10/26/16	S. Higgins	Review and respond to numerous emails relative to hearing and filings	L200	L210	0.70
10/26/16	S. Higgins	Review numerous emails relative to business issues relating to receivership entities	L100	L140	0.30
10/26/16	J. Muzzarelli	Review email exchanges with M. Moseley re treasury services agreement, signature cards and minimizing delays in making required payments to contractors	L100	L190	0.60
10/26/16	J. Muzzarelli	Receive voicemail from attorney for First Community Credit Union re letter requesting funds transfer	L100	L190	0.10
10/26/16	J. Muzzarelli	Return telephone call to S. Newhouse at First Community Credit Union re letter requesting funds transfer	L100	L190	0.20
10/26/16	J. Muzzarelli	Receive and complete documents needed for telephone transfers from other accounts held by Commerce Bank	L100	L190	0.60
10/26/16	J. Muzzarelli	Telephone conference with L. Urban at Commerce Bank re negative balance in GATS account	L100	L190	0.10
10/26/16	J. Muzzarelli	Work on paperwork necessary to transfer funds from accounts not held by Source Pundit	L100	L190	0.60
10/26/16	J. Muzzarelli	Review and provide comments re letter to landlord of Trenton Avenue location	L100	L120	0.20

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Date	Atty	Description	Phase	Task	Hours
10/26/16	C. Schenk	Communications with FTC re bank accounts, PI hearing and related issues (.2); seek advice of S. Higgins re same (.2); communications with Segue re accounting systems (.2); review communication from J. Crow re accounting issues and follow up with CLA, follow up communications regarding same (.8); review and revise multiple letter to merchant account holders, follow up regarding payments from same (.7); attention to Digicare payments and related issues (.3); review lease, amendment and related communications (.7); edit letter to landlord (.6); subsequent communications with occupant and landlord (.3); work on website and notice to consumers (.2)	L100	L120	4.20
10/27/16	S. Higgins	Review and respond to emails relative to hearing and receivership issues	L100	L140	0.50
10/27/16	J. Muzzarelli	Telephone call from S. Aiello re wire transfer instructions to transfer funds to East West Bank for accounts other than Source Pundit	L100	L190	0.20
10/27/16	J. Muzzarelli	Receive and download CD from FBI box 20	L300	L390	0.30
10/27/16	J. Muzzarelli	Revise project task list to indicate completed tasks and add new items	L100	L120	0.30
10/27/16	J. Muzzarelli	Finalize and send letter requesting funds transfer to Clearent for Global sMind account	L100	L190	0.10
10/27/16	J. Muzzarelli	Finalize and send letter requesting funds transfer to PaySafe for GATS account	L100	L190	0.10
10/27/16	J. Muzzarelli	Receive and review documents from J. Einikis received from Commerce Bank	L300	L390	1.20
10/27/16	J. Muzzarelli	Prepare and send letter requesting funds transfer to Carrollton Bank	L100	L190	0.40
10/27/16	J. Muzzarelli	Prepare for and meet with R. Chhatwal re discussion regarding regarding various accounts at Commerce Bank and Central Bank	L100	L190	0.60

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 J. Muzzarelli

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Date	Atty	Description	Phase	Task	Hours
10/27/16	J. Muzzarelli	Review updated account balances received from Commerce Bank and reconcile with amounts received previously	L300	L390	0.40
10/27/16	C. Schenk	Telephone conference with counsel for Chhatwal (.5); telephone conference with SEC to prepare for PI hearing (.4); communications with CLA re accountant documents and related issues (.3)	L100	L190	1.20
10/28/16	E. Hargis	Review documents on record in support of preliminary injunction and defendants' replies to motion	L200	L250	0.20
10/28/16	E. Hargis	Report to C. Schenk re outcome of hearing and additional steps needed	L100	L190	0.10
10/28/16	S. Higgins	NO CHARGE (1.3 hours) Prepare for and attend hearing; meet with C. Schenk and S. Gordon relative to status and strategies	L200	L250	4.10
10/28/16	J. Muzzarelli	Review and document production from Commerce Bank for various bank accounts	L300	L390	0.50
10/28/16	J. Muzzarelli	Download bank statements for Helios Digital received from Jerrold Rosen	L300	L390	0.20
10/28/16	J. Muzzarelli	Download bank statements for Helios Digital received from Jerrold Rosen and send email to FTC re connection between Helios Digital and Helios Travels and undiscovered bank accounts at PNC	L300	L390	0.40
10/28/16	J. Muzzarelli	Review master list of accounts for receivership defendants that were sent freeze letters and reconcile with our records	L300	L390	0.50
10/28/16	J. Muzzarelli	Exchange emails with J. Auen at Central Bank and C. Schenk re paperwork needed to wire funds to East West Bank	L100	L190	0.20
10/28/16	J. Muzzarelli	Prepare documents received from B. Bala and send to E. Mills and R. Finneran	L100	L190	0.30
10/28/16	J. Muzzarelli	Exchange emails with C. Schenk re documents produced by B. Bala	L300	L390	0.10
10/28/16	J. Muzzarelli	Revise project task list to include new tasks identified by C. Schenk	L100	L120	0.10

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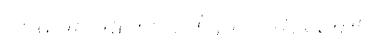
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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/28/16	C. Schenk	Attend PI hearing re permanent appointment of Receiver, prepare for same with S. Higgins (1.9); follow up discussion with S. Gordon (.9); attention to account at Central Bank (.1); communication with T. O'Shaughnessy, follow up with B. Bala , overview of documents produced by same (.2)	L200	L250	3.10
10/31/16	J. Muzzarelli	Receive email from B. Edwards re Clearent representative who will contact me to initiate transfer of funds to East West Bank	L100	L190	0.10
10/31/16	J. Muzzarelli	Draft email to S. Aeillo re wire transfers from Commerce Bank to East West Bank	L100	L190	0.10
10/31/16	C. Schenk	Attention to transfers to Central and Commerce Bank (.3); preliminary review of summary of income for Global sMinds and follow up with CLA (.3)	L100	L120	0.60
Total Hours					152.50
Amount For Services					\$54,223.00

For Cash Outlays:

10/04/16	For filing fee re miscellaneous civil case; VENDOR: United States District Court for the Nor INVOICE#: 0500-0810-8885 DATE: 10/4/2016	\$46.00
10/04/16	For filing fee re miscellaneous civil case; VENDOR: Clerk of the United States District Cour INVOICE#: 0500-0810-9197 DATE: 10/4/2016	\$46.00
10/04/16	For filing fee re miscellaneous civil case; VENDOR: US District Court for the Southern Distr INVOICE#: 0500-0810-9386 DATE: 10/4/2016	\$46.00
10/04/16	For filing fee re miscellaneous civil case; VENDOR: US District Court for Delaware INVOICE#: 0500-0810-9273 DATE: 10/4/2016	\$46.00
10/06/16	Messenger services to file or obtain documents in court re entry of appearance, Federal Court USDC- Eastern District of Missouri	\$15.00

Invoice


November 29, 2016

Invoice #3201470

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U.S. District Court Eastern District of Missouri

For Cash Outlays:

10/07/16	For filing fee for miscellaneous civil case; VENDOR: US District Court, Clerk of Court INVOICE#: 0500-0812-0712 DATE: 10/5/2016	\$46.00
10/10/16	For overnight delivery service TO: Clerk of the Court, US District Court for, 225 CADMAN PLZ E, Brooklyn, NY 11201; VENDOR: Federal Express Corp. INVOICE#: 557722398, DATE: 10/13/2016, Tracking #: 784311525987, Shipment Date: 10/10/2016	\$13.02
10/10/16	For overnight delivery service TO: Clerk of the Court, US District Court for, 300 S 4TH ST, Minneapolis, MN 55415; VENDOR: Federal Express Corp. INVOICE#: 557722398, DATE: 10/13/2016, Tracking #: 784311581965, Shipment Date: 10/10/2016	\$11.21
10/10/16	For overnight delivery service TO: Clerk of the Court, US District Court for the, 400 E 9TH ST STE 1510, Kansas City, MO 64106; VENDOR: Federal Express Corp. INVOICE#: 557722398, DATE: 10/13/2016, Tracking #: 784311637343, Shipment Date: 10/10/2016	\$23.75
10/10/16	For overnight delivery service TO: Clerk of the Court, US District Court for the, 600 E MONROE ST STE 151, Springfield, IL 62701; VENDOR: Federal Express Corp. INVOICE#: 557722398, DATE: 10/13/2016, Tracking #: 784311700636, Shipment Date: 10/10/2016	\$9.68
10/10/16	For overnight delivery service TO: Clerk of Court, US District Court Eastern, 601 MARKET ST, Philadelphia, PA 19106; VENDOR: Federal Express Corp. INVOICE#: 557722398, DATE: 10/13/2016, Tracking #: 784312975121, Shipment Date: 10/10/2016	\$13.02
10/10/16	For overnight delivery service TO: George Adams, George Adams & Co Insurance A, 4501 CARTWRIGHT RD STE 402, Missouri City, TX 77459; VENDOR: Federal Express Corp. INVOICE#: 557722398, DATE: 10/13/2016, Tracking #: 784313262471, Shipment Date: 10/10/2016	\$16.77
10/10/16	For bond premium re receiver bond; VENDOR: George Adams & Company Insurance Agency, INVOICE#: 1729 DATE: 10/6/2016	\$100.00
10/10/16	For filing fee for miscellaneous civil case; VENDOR: United States District Court for the Cen INVOICE#: 0500-0816-0410 DATE: 10/10/2016	\$46.00

Invoice


November 29, 2016


Invoice # 3201470

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U.S. District Court Eastern District of Missouri

For Cash Outlays:

10/10/16	For filing fee for miscellaneous civil case; VENDOR: Clerk of the Court, U.S. District Court INVOICE#: 0500-0816-0767 DATE: 10/10/2016	\$46.00
10/10/16	For filing fee for miscellaneous civil case; VENDOR: Clerk of the US District Court, Western INVOICE#: 0500-0816-0740 DATE: 10/10/2016	\$46.00
10/10/16	For filing fee re miscellaneous civil case; VENDOR: Clerk of the Court INVOICE#: 0500-0816-0839 DATE: 10/10/2016	\$46.00
10/11/16	For overnight delivery service TO: Department of Treasury, Internal Revenue Service, 30 W PERSHING RD, Kansas City, MO 64108; VENDOR: Federal Express Corp. INVOICE#: 558555291, DATE: 10/20/2016, Tracking #: 784323664991, Shipment Date: 10/11/2016	\$9.17
10/11/16	For filing fee for receiver's surety bond; VENDOR: US District Court, Clerk of Court INVOICE#: 0500-0816-7818 DATE: 10/11/2016	\$46.00
10/12/16	Messenger services to file or obtain documents in court re Bond of Receiver, Federal Court USDC - Eastern District of Missouri	\$15.00
10/13/16	For overnight delivery service TO: Clerk of Court, US District Court Southern D, 515 RUSK ST, Houston, TX 77002; VENDOR: Federal Express Corp. INVOICE#: 558555291, DATE: 10/20/2016, Tracking #: 784346037190, Shipment Date: 10/13/2016	\$16.77
10/13/16	For overnight delivery service TO: Katie Thompson, US District Court for MN, 300 S 4TH ST, Minneapolis, MN 55415; VENDOR: Federal Express Corp. INVOICE#: 558555291, DATE: 10/20/2016, Tracking #: 784346173489, Shipment Date: 10/13/2016	\$15.85
10/14/16	For overnight delivery service TO: Rene Khanverdi, East West Bank, 135 N LOS ROBLES AVE, Pasadena, CA 91101; VENDOR: Federal Express Corp. INVOICE#: 558555291, DATE: 10/20/2016, Tracking #: 784356708209, Shipment Date: 10/14/2016	\$19.07
10/20/16	For courier service by Absolute Delivery Service LLC to Sidney Furst at 10756 Trenton Ave on October 10, 2016	\$33.60

Invoice


November 29, 2016
 Invoice # 3201470
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U.S. District Court Eastern District of Missouri

For Cash Outlays:

10/28/16	For filing fee re miscellaneous civil case in US District Court Southern District of TX; VENDOR: United States District Court for the Sou INVOICE#: 0500-0829-3504 DATE: 10/25/2016	\$46.00	
	For postage	\$45.45	
	For reproduction charges	\$70.24	
	For color reproduction charges	\$12.60	
Amount For Cash Outlays			\$946.20

TIME SUMMARY BY TIMEKEEPER

Timekeeper	Hours Worked	Billed Per Hour	Bill Amount
E. Hargis	40.80	\$245.00	\$9,996.00
S. Higgins	9.20	\$590.00	\$5,428.00
A. Konstantinovich	1.30	\$330.00	\$429.00
J. Muzzarelli	39.80	\$185.00	\$7,363.00
C. Schenk	61.40	\$505.00	\$31,007.00
<u>Total All Timekeepers</u>	<u>152.50</u>	<u>\$355.56</u>	<u>\$54,223.00</u>

For Services	\$54,223.00
Less No Charge Entries	-4,361.00
Less 15% Discount	-7,479.30
Amount For Services	42,382.70
Amount For Cash Outlays	946.20

TOTAL DUE	\$43,328.90
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Invoice

Case: 4:16-cv-01556-HEA Doc. #: 59-3 Filed: 12/02/16 Page: 21 of 34 PageID #: 1859



November 29, 2016

Direct Correspondence To:
One US Bank Plaza
St. Louis, Missouri 63101-1693
314-552-6000
AccountsReivable@ThompsonCoburn.com

U.S. District Court Eastern District of Missouri
Attn: Hon. Henry E. Autrey
Thomas F. Eagleton Courthouse
111 S. 10th Street
3rd Floor
St. Louis, Missouri 63102

TIN 43-0666662

REMITTANCE COPY

PAYMENT DUE UPON RECEIPT
PLEASE REFERENCE INVOICE NUMBER WITH YOUR PAYMENT

Invoice # 3201470

\$43,328.90

Please remit this copy with your check to:

Thompson Coburn LLP
P.O. Box 18379M
St. Louis, MO 63195

Wire Transfer Instructions:

Swift Code: USBKUS44IMT
Bank Name: US Bank N.A.
ABA/Routing Number: 081000210
Bank Account Name: Thompson Coburn LLP
Account Number: 100 0606952

ACH Instructions (United States only):
NOT FOR WIRE TRANSFER USE

Account Name: Thompson Coburn LLP
Bank: U.S. Bank
ABA/Routing Number: 021052053
Account Number: 25657335

Please reference invoice number(s) with ACH or send an e-mail with the information to
AccountsReivable@ThompsonCoburn.com



Remit To:
P.O. Box 18379M
St. Louis, Missouri 63195

November 29, 2016
Invoice #3201471

ACH Instructions: (Not for Wire Transfer)
Account Name: Thompson Coburn LLP
Bank: U.S. Bank
ABA/Routing Number: 021052053
Account Number: 25657335
Please reference invoice number(s).

For Wire Transfer Instructions or Other
Communications Please Contact:
One US Bank Plaza
St. Louis, Missouri 63101-1693
314-552-6000
AccountsReceivable@ThompsonCoburn.com

U.S. District Court Eastern District of Missouri
Attn: Hon. Henry E. Autrey
Thomas F. Eagleton Courthouse
111 S. 10th Street
3rd Floor
St. Louis, Missouri 63102

TIN 43-0666662

For Legal Services Rendered in Connection With:
Source Pundit LLC
TC File: 54464 / 160464

Date	Atty	Description	Phase	Task	Hours
10/05/16	C. Schenk	Meet with R. Chhatwal to seek document turnover and understand business operations of Receivership entities, in particular Source Pundit, summarize same	L05	L05.500	1.60
10/06/16	E. Hargis	Draft Source Pundit employee turnover letter	L06	L06.500	0.30
10/06/16	E. Hargis	Finalize two employee turnover letters and create PDFs	L06	L06.500	0.10
10/06/16	C. Schenk	Prepare notice letter to Jain	L05	L05.500	0.50
10/09/16	C. Schenk	Analyze matters pertaining to Source Pundit (.2)	P200	P200	0.20
10/10/16	C. Schenk	Telephone conference with R. Chhatwal regarding Source Pundit (.8)	P100	P100	0.80
10/11/16	E. Hargis	Research █████ business connection	L06	L06.500	0.30
10/11/16	C. Schenk	Provide update to R. Chhatwell re Source Pundit status (.3)	P100	P100	0.30
10/12/16	E. Hargis	Exchange and file correspondence and new documents from Source Pundit and report to C. Schenk re █████ letter	L05	L05.500	0.60
10/12/16	E. Hargis	Compose turnover letter to █████	L05	L05.200	0.60
10/12/16	J. Muzzarelli	Exchange emails with R. Chhatwal re documents received from J. Vivek	L02	L02.200	0.10
10/13/16	J. Muzzarelli	Telephone call to/from R. Chhatwall	L03	L03.125	0.60

Invoice

THOMPSON COBURN LLP

November 29, 2016
 Invoice #3201471
 Page 2

U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/13/16	J. Muzzarelli	Provide summary of call with R. Chhatwal to C. Schenk and prepare for meeting next week	L03	L03.100	0.20
10/13/16	C. Schenk	Update and finalize letter to ██████ re receivership and Source Pundit matters, analyze business issues pertaining to same (.8)	P100	P100	0.80
10/14/16	E. Hargis	Draft and send secondary correspondence with ██████ bank	L05	L05.200	0.20
10/14/16	J. Muzzarelli	Draft letter to ██████ re new back account information for Source Pundit	L05	L05.200	0.40
10/14/16	C. Schenk	Communications with E. Reid regarding Source Pundit (.3)	P100	P100	0.30
10/17/16	E. Hargis	Respond to correspondence and locate and forward banking information letter to ██████	L05	L05.200	0.10
10/17/16	J. Muzzarelli	Review documents received from FTC	P200	P200	0.50
10/17/16	J. Muzzarelli	Review documents re Source Pundit and draft memorandum to file re due diligence re legitimacy of the company	L03	L03.100	2.70
10/17/16	J. Muzzarelli	Prepare for and attend telephone conference with R. Chhatwal and E. Reid	L05	L05.200	1.10
10/17/16	J. Muzzarelli	Draft letter to ██████ for C. Schenk's approval	L05	L05.200	0.50
10/17/16	C. Schenk	Review and respond to communication with V. Jain re Source Pundit (.3); attention to tax issues described by R. Chhatwal and V. Jain (.3); prepare for call with R. Chhatwal, V. Jain and E. Reid to discuss open items, in particular, Source Pundit issues (.8); telephone conference with E. Reid, R. Chhatwal, and V. Jain regarding Source Pundit payment processes and other pending items (1.0); draft and finalize letter to ██████ regarding payment issues (.9)	P100	P100	3.30
10/18/16	J. Muzzarelli	Review email to ██████ at ██████ Corporation in Japan	L05	L05.200	0.10
10/18/16	J. Muzzarelli	Review and analyze email from R. Chhatwal and documents received from V. Jain re payroll for September	L03	L03.100	1.80

Invoice

November 29, 2016

November 29, 2016

Invoice #3201471

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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/18/16	J. Muzzarelli	Draft amendment to service agreement between █████ and Source Pundit LLC to reflect updated bank account information for monthly remittances	L03	L03.100	0.80
10/18/16	C. Schenk	Review request for information from █████ and prepare preliminary response to same (.3); review amendment to service agreement (.2)	P200	P200	0.50
10/19/16	J. Muzzarelli	Review email from █████ at █████ and begin gathering documents related to Source Pundit	L05	L05.200	0.90
10/20/16	J. Muzzarelli	Using usernames and passwords received from V. Jain, review linkedin accounts held by Source Pundit	L03	L03.100	1.80
10/20/16	J. Muzzarelli	Review and prepare summary of information requested by █████	L05	L05.200	1.60
10/20/16	C. Schenk	Review information provided by M. Jain re SP Linked in accounts (.1)	P200	P200	0.10
10/21/16	C. Schenk	Review information provided for potential response to █████ and communications regarding same (.2); review information pertaining to █████ response (.1)	P200	P200	0.30
10/24/16	C. Schenk	Prepare communication in response to █████ and review communication from same (.3); meet with R. Chhatwal to discuss Source Pundit operations and receivership matters (1.5); prepare for same (.3); analyze proposed response to █████ (.3)	P100	P100	2.40
10/25/16	J. Muzzarelli	Review emails with R. Chhatwal re response to █████ re Source Pundit	L05	L05.200	0.70
10/25/16	J. Muzzarelli	Provide service agreement between █████ and Source Pundit to C. Schenk for review	L03	L03.100	0.10
10/25/16	J. Muzzarelli	Prepare documents for C. Schenk in preparation for finalizing response to █████ re Source Pundit business	L03	L03.100	0.30
10/25/16	C. Schenk	Review order and research file documents to outline and prepare draft response to █████ re ongoing business of SP, LLC (1.6); edit and finalize same, include relevant documents and support (1.8)	L03	L03.100	3.40

*Invoice**Blawie & Associates, P.C.*

November 29, 2016

Invoice #3201471

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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/25/16	C. Schenk	Communication with R. Chhatwal re Linked In account (.2)	P100	P100	0.20
10/26/16	J. Muzzarelli	Review emails exchanges with ██████████ at ██████████	L05	L05.200	0.20
10/26/16	J. Muzzarelli	Review and sign signature cards and receive voicemail from S. Aeillo at Commerce Bank	L05	L05.200	0.20
10/26/16	J. Muzzarelli	Discuss and prepare summary of remittances to be made to Source Pundit contractors for C. Schenk	L06	L06.530	0.40
10/26/16	J. Muzzarelli	Telephone conferences with C. Schenk and S. Aiello re transfer of funds from accounts not held by Source Pundit	L05	L05.200	0.40
10/26/16	J. Muzzarelli	Set up Commerce Connections account and initiate wire transfers to Source Pundit contractors for approval	L05	L05.200	1.60
10/26/16	C. Schenk	Review communications from ██████████ and requests from same (.2); draft letters requested by ██████████ to continue relationship (.8); draft letter at request of ██████████ re change in bank account (.6); communications regarding both with R. Chhatwal (.4); telephone conference with Commerce Bank to work towards effectuation of contractor payments, review same and follow up with R. Chhatwal (.8)	P100	P100	2.80
10/27/16	J. Muzzarelli	Review email exchanges with R. Chhatwal re payment to contractors and draft letter to ██████████	L05	L05.200	0.30
10/27/16	J. Muzzarelli	Participate in conference call with E. Reid re Source Pundit payments and business operations moving forward	L05	L05.200	0.40
10/27/16	J. Muzzarelli	Work with C. Schenk to double check and approve wire transfers to contractors for ██████████	L05	L05.200	0.50
10/27/16	J. Muzzarelli	Prepare documents confirming wire transfers and send to R. Chhatwal and V. Jain	L05	L05.200	0.30

*Invoice**Invoice Due Upon Receipt*

November 29, 2016
 Invoice #3201471
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U.S. District Court Eastern District of Missouri

Date	Atty	Description	Phase	Task	Hours
10/27/16	J. Muzzarelli	Telephone conference with Commerce Bank confirming wire transfers to India accounts for two contractors who had amounts going to Japan previously	L05	L05.200	0.30
10/27/16	J. Muzzarelli	Review and finalize letters to ██████ and meeting with R. Chhatwal for approval signature	L05	L05.200	0.40
10/27/16	C. Schenk	Work on payments to contractors, review details pertaining to same, finalize transfers (1.4); finalize letter to ██████ re change in bank accounts (.6); finalize letter to ██████ re SP LLC business practices (.7); transmittal communication to ██████ re same (.2)	P100	P100	2.90
10/28/16	J. Muzzarelli	Review and analyze documents received from Commerce Bank to determine amount of revenue received from Merchant accounts connected with OneSource Tech Support	L06	L06.200	0.80
10/31/16	C. Schenk	Analyze information re SP India and SP Japan requests for payment (.2)	P200	P200	0.20
Total Hours					42.80
Amount For Services					\$14,642.00

TIME SUMMARY BY RANK

Timekeeper	Hours Worked	Billed Per Hour	Billed Amount
C. Schenk	20.60	\$505.00	\$10,403.00
Subtotal for Partner	20.60	\$505.00	\$10,403.00
E. Hargis	2.20	\$245.00	\$539.00
Subtotal for Associate	2.20	\$245.00	\$539.00
J. Muzzarelli	20.00	\$185.00	\$3,700.00
Subtotal for Legal Assistant (paralegals and other legal support personnel)	20.00	\$185.00	\$3,700.00
Total All Classes	42.80	\$342.10	\$14,642.00

Invoice

Case: 4:16-cv-01556-HEA Doc. #: 59-3 Filed: 12/02/16 Page: 27 of 34 PageID #: 1865

November 29, 2016
Invoice #3201471
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U.S. District Court Eastern District of Missouri

For Services	\$14,642.00
Less 15% Discount	-2,196.30
Amount For Services	12,445.70

TOTAL DUE	\$12,445.70
------------------	--------------------

Invoice

Invoice Due Upon Receipt



November 29, 2016

Direct Correspondence To:
One US Bank Plaza
St. Louis, Missouri 63101-1693
314-552-6000
AccountsReceivable@ThompsonCoburn.com

U.S. District Court Eastern District of Missouri
Attn: Hon. Henry E. Autrey
Thomas F. Eagleton Courthouse
111 S. 10th Street
3rd Floor
St. Louis, Missouri 63102

TIN 43-0666662

REMITTANCE COPY

PAYMENT DUE UPON RECEIPT

PLEASE REFERENCE INVOICE NUMBER WITH YOUR PAYMENT

Invoice # 3201471

\$12,445.70

Please remit this copy with your check to:

Thompson Coburn LLP
P.O. Box 18379M
St. Louis, MO 63195

Wire Transfer Instructions:

Swift Code: USBKUS44IMT
Bank Name: US Bank N.A.
ABA/Routing Number: 081000210
Bank Account Name: Thompson Coburn LLP
Account Number: 100 0606952

ACH Instructions (United States only):

NOT FOR WIRE TRANSFER USE

Account Name: Thompson Coburn LLP
Bank: U.S. Bank
ABA/Routing Number: 021052053
Account Number: 25657335

Please reference invoice number(s) with ACH or send an e-mail with the information to
AccountsReceivable@ThompsonCoburn.com



Provider
Segue Partners, LLC.
7905 Big Bend Boulevard
Suite 205
St. Louis, MO 63119
MichelleM@SeguePartners.com
SeguePartners.com

Customer
Federal Trade Commission
c/o Claire Schenk
Thompson Coburn
One US Bank Plaza
St. Louis, MO 63101-1693

Invoice No. #INV-20161108-683
Date 11/08/2016
Due Date 11/08/2016

INVOICE

Item	Description	Price/Unit	Qty	Price
John Branham, Accounting Assistant	Accounting Services	\$60.00	1.5	\$90.00
Lisa McDonald, Director	Accounting Services	\$215.00	1	\$215.00
Michelle Murray, Managing Director	Consulting Services	\$300.00	1	\$300.00
Subtotal				\$605.00
Discount 10%				-\$60.50
Tax 0%				\$0.00
Total				\$544.50

Thank you for your business. October 2016 Hours

FTC

Created by Ann Ciccirelli



Projects for client Federal Trade Commission
 Users Ann Ciccirelli, Michelle Murray, Managing Director, Lisa McDonald, Luke McGowan, Jordan Tierney, Dylan Jungels, John Branham
 Time interval 09/30/2016 — 10/31/2016

Total	3 hrs 30 min
Federal Trade Commission	3 hrs 30 min
John Branham	1 hrs 30 min
Client calls, emails and meetings	1 hrs
10/25/2016 12:30 pm — 01:30 pm	1 hrs
Conference call to discuss what we will be working on	
Engagement matters	30 min
10/26/2016 09:30 am — 10:00 am	30 min
Read and go over court order	
Lisa McDonald	1 hrs
Client calls, emails and meetings	1 hrs
10/25/2016 12:30 pm — 01:30 pm	1 hrs
Conference call with Thompson Coburn followed up with brief Segue staff meeting to outline next steps.	
Michelle Murray, Managing Director	1 hrs
Client calls, emails and meetings	1 hrs
10/25/2016 12:30 pm — 01:30 pm	1 hrs
Intro call with Claire and Jolene.	
Total	3 hrs 30 min



Direct Billing Inquiries to:

CliftonLarsonAllen LLP
4250 N. Fairfax Drive, Suite 1020
Arlington, VA 22203
New Address Effective 12/5/16
901 N. Glebe Road, Suite 200
Arlington, VA 22203
(571) 227-9688

Global Access Technical Support Receivership - Tax &
Accounting
c/o Claire M. Schenk, Esq., Receiver
Thompson Coburn LLP
One US Bank Plaza
St. Louis, MO 63101

Account Number 064-076112
Invoice Date 11/29/2016
Invoice # 1390584

schenk@thompsoncoburn.com

Professional services rendered October 27 - November 25, 2016

Professional detail is attached

Invoice Total \$472.50

We Appreciate Your Business and Referrals

Payment is due upon receipt.

Please detach and remit payment to the address below.

CliftonLarsonAllen LLP
ATTN: Wayne Breloff
4250 N. Fairfax Drive, Suite 1020
Arlington, VA 22203
New Address Effective 12/5/16
901 N. Glebe Road, Suite 200
Arlington, VA 22203
571-227-9688

Amount Remitted \$ _____
Account Number 064-076112
Invoice Number 1390584

**Global Access Technical Support LLC Receivership
Attachment to Invoice # 1390584**

		November 2016 Invoice # 1390584				Total Billed to Date 2016 Tax Year
<u>Company</u>	<u>Previous Billings for 2016 Tax Returns</u>	<u>Hours</u>	<u>Actual</u>	<u>Amount Exceeds flat fee of \$3,000 (1)</u>	<u>Billed</u>	<u>Tax Prep: Billed (1)</u>
Global Access Technical Support LLC						-
Global sMind LLC	-	1.50	472.50	-	472.50	472.50
Helios Digital Media LLC						-
Source Pundit LLC						-

TOTAL 1.50 472.50 - 472.50 472.50

Expenses	-	-
	<u>-</u>	<u>-</u>
Total Fees & Expenses**	<u>472.50</u>	<u>472.50</u>

** Notes

(1) Per 10/17/16 EL, fees set forth in 10/12/16 Proposal not to exceed \$3,000 for federal & state partnership tax returns

Attachment to Invoice 1390584 Dated 11/29/2016

Client: 064-076112 Global Access Receivership - Tax & Accounting

Engagement						
Date	Name	Office	Hours	Rate	Amount	Description
Engagement: - Global sMind LLC - 2016 Tax						
Task Code: - Administration (Tax)						
10/27/2016	T O'Shaughnessy	098 St Louis	0.30	315.00	94.50	Phone call with Claire related to receivership issues
11/17/2016	T O'Shaughnessy	098 St Louis	0.20	315.00	63.00	Email response to Michelle Murray related to amended tax return review
Subtotal for Task Code:- Administration (Tax)			<u>0.50</u>		<u>157.50</u>	
Task Code: - Tax Planning						
11/07/2016	T O'Shaughnessy	098 St Louis	1.00	315.00	315.00	Review of Excel work papers provided by Claire and compare to amended tax returns.
Subtotal for Task Code:- Tax Planning			<u>1.00</u>		<u>315.00</u>	
Subtotal for engagement:- Global sMind LLC - 2016 Tax			<u>1.50</u>		<u>472.50</u>	
Grand Total			<u><u>1.50</u></u>		<u><u>472.50</u></u>	

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FEDERAL TRADE COMMISSION,)
)
Plaintiff,)
)
v.)
)
GLOBAL ACCESS TECHNICAL)
SUPPORT LLC, et al.)
)
Defendants.)

Case No. 4:16-cv-01556-HEA

**ORDER ON RECEIVER’S APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES AND EXPENSES INCURRED BY THE
RECEIVER, RETAINED COUNSEL, AND OTHER PROFESSIONALS**

This matter is before the Court on the *Receiver’s Application for Allowance and Payment of Expenses Incurred by the Receiver, Retained Counsel, and Other Professionals* (the “Application”) filed by Claire M. Schenk, in her capacity as receiver (“Receiver”) for Defendants Global Access Technical Support LLC (“GATS”), Global sMind LLC (“Global sMind”), Source Pundit LLC (“Source Pundit”), and Helios Digital Media LLC (“Helios”) (collectively, the “Receivership Defendants”), on December 5, 2016. The Receiver submitted the Application to the Federal Trade Commission (“FTC”) for review before filing it with the Court.

In the Application, the Receiver seeks a total award of \$56,791.60, consisting of: (a) \$55,774.60 in legal fees and costs for Thompson Coburn LLP, the Receiver’s primary counsel; (b) \$544.50 in professional fees for Segue Partners, LLC, the Receiver’s bookkeeper; and (c) \$472.50 in professional fees for CliftonLarsonAllen LLP, the Receiver’s accountant, tax preparer, forensics and valuation expert.

The Court has reviewed the Application and supporting documentation and concludes that the requested fees and costs are reasonable and appropriate.

Having fully considered the Application and being duly advised as to the merits,

THE COURT DOES HEREBY ORDER THAT

1. The Receiver's Application is granted in its entirety;
2. The Receiver is authorized to make payment of the total amount of legal and professional fees and incurred costs out of the assets of the Receivership estate as follows:
 - (a) \$54,828.40 in legal fees and \$946.20 in costs for Thompson Coburn LLP, the Receiver's primary counsel;
 - (b) \$544.50 in professional fees for Segue Partners, LLC, the Receiver's bookkeeper; and
 - (c) \$472.50 in professional fees for CliftonLarsonAllen LLP, the Receiver's accountant, tax preparer, forensics and valuation expert.

SO ORDERED this the ____ day of _____, 2016.

THE HONORABLE HENRY E. AUTREY
UNITED STATES DISTRICT JUDGE