

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 18-61017-CIV-ALTONAGA/SELTZER**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**POINTBREAK MEDIA, LLC, et al.,**

Defendants.

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**RECEIVER'S FIRST MOTION FOR AWARD OF  
PROFESSIONAL FEES AND REIMBURSEMENT OF EXPENSES**

Jonathan E Perlman, Esq., as Receiver (the "Receiver") for the Receivership Defendants,<sup>1</sup> files his First Motion for Award of Professional Fees and Reimbursement of Expenses (the "Application").

**I. INTRODUCTION**

1. In accordance with this Court's Preliminary Injunction, by this Application, the Receiver seeks an award of professional fees and reimbursement of expenses for himself, for his lawyers, and for his accountants for the time period from the Receiver's appointment on May 8, 2018 through June 30, 2018 for their substantial efforts in discharging the Receiver's obligations in this receivership. [ECF No. 64, pgs. 24-25].

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<sup>1</sup> The "Receivership Defendants" or "Receivership Entities" shall mean Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Internet Marketing LLC; Modern Source Media LLC; Perfect Image Online LLC, and their divisions, subsidiaries, affiliates, predecessors, successors, assigns, and any fictitious business entities or business names created or used by these entities, or any of them. [ECF No. 12 at p.5]. "Receivership Defendants" or "Receivership Entities" shall also include Pinnacle Presence, LLC, National Business Listing, LLC, and Allstar Data, LLC, whom the Receiver has identified and deemed to be additional Receivership Entities pursuant to the PI. [See ECF No. 55].

2. On May 8, 2018, the U.S. Federal Trade Commission (“FTC” or “Plaintiff”) commenced this action by filing a complaint for permanent injunction and other relief (the “Complaint”), and a motion for a temporary restraining order and other equitable relief alleging that Defendants Dustin Pillonato (“Pillonato”), Justin Ramsey (“Ramsey”), Aaron Michael Jones (“Jones”), Ricardo Diaz (“Diaz”), Michael Pocker (“Pocker”), and Steffan Molina (“Molina”) (collectively, the “Individual Defendants”), the Corporate Defendants, and the Receivership Entities,<sup>2</sup> (collectively, the “Defendants”), violated and were likely to violate Section 5(a), of the FTC Act, 15 U.S.C. §45(a). [ECF No. 1, “Compl.”].

3. That same day, the Court granted the Plaintiffs’ application for a temporary restraining order with asset freeze against Defendants and appointed Jonathan E. Perlman as temporary receiver (the “TRO”) and directed him to assume full control of the Receivership Entities and their affiliates, subsidiaries, divisions, and sales operations. The TRO further directed the Receiver to 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. The TRO further granted the Receiver authority to divert mail and to sue for, collect, receive, take in possession, hold, and manage all assets and documents of the Receivership Defendants and other persons or entities whose interests are now held by or under the direction, possession, custody, or control of the Receivership Defendants. [ECF. No. 12].

4. On May 9, 2018, the Receiver and his team, with the assistance of law enforcement, took possession of the Receivership Defendants’ three locations, and proceeded to

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<sup>2</sup> Pursuant to the Order, “Receivership Entities” means “Corporate Defendants, as well as any other entity that the Receiver determines is controlled or owned by any Defendant and has (a) conducted any business related to Defendants’ marketing of Google listings and search engine optimization services; (b) commingled or pooled assets with any defendant; or (c) otherwise participated in the transfer or receipt of assets derived from any activity that is the subject of the Complaint in this matter.” [ECF No. 12 at p. 5].

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.

5. On June 5, 2018, the Receiver filed his First Interim Report advising of his team's efforts and recommendations. [ECF No. 56].<sup>3</sup>

6. On June 6, 2018, the Court held an evidentiary hearing on the Plaintiffs' motion for Preliminary Injunction and entered an order granting Preliminary Injunction and appointing Jonathan E. Perlman, as permanent receiver on June 7, 2018 (the "PI"). [ECF No.64].

7. The Receiver, a shareholder with the law firm of Genovese Joblove & Battista, P.A. ("GJB"), retained GJB as his lead counsel. The Receiver also retained Soneet R. Kapila and his firm, KapilaMukamal, LLP (collectively "KM"), to provide tax-related services.

8. Under the terms of both the TRO and PI, the Receiver and all personnel hired by the Receiver, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties undertaken pursuant to the TRO and PI and for the cost of actual out-of-pocket expenses incurred from the assets now held by or in the possession or control of, or which may be received by the Defendants. [ECF No. 64 at Section XX].

9. Further, pursuant to the PI, the Receiver shall file with the Court, and serve on the parties, periodic motions for the payment of such compensation, the first of which is due on July 9, 2018. *Id.* The motion is currently due on July 31, 2018. Accordingly, the Receiver submits this Application for the Court's consideration.

10. To preserve assets for consumers, all time has been billed at the reduced agreed upon rate. All GJB timekeepers are billed at 10-20% below their regular hourly billing rate. In addition, the Receiver is billed at \$425 per hour, representing a 19% reduction from his normal hourly rate. As an additional benefit to the Receivership Estate, the Receiver and GJB are not

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<sup>3</sup> On June 6, 2018, the Receiver filed a corrected First Interim Report. [ECF No. 57].

requesting reimbursement for the work by certain members of the Receiver's team employed by GJB who regularly provide critical functions in IT, internal accounting, and consumer relations.

11. The Receiver and GJB have also agreed to bear any costs they have incurred for faxes and Westlaw research to further conserve the Receivership's assets. Further, the Receiver and GJB have agreed to charge a reduced price per page for photocopies and printing.

12. No prior applications for compensation have been filed and no compensation has been paid to the Receiver, GJB, or KM.

13. The Receiver and GJB hereby submit for approval GJB's invoice (which includes the Receiver's time) for \$284,355 in fees for 844.20 hours of services during the period commencing May 8, 2018 through and including June 30, 2018, and expenses in the sum of \$5,186.55. Besides the aforementioned discounted hourly rates, GJB has agreed to forego an additional \$28,050 of fees as an additional benefit to the Receivership Estate.

14. Attached hereto as Exhibit "A" is a detailed invoice from GJB reflecting the time spent, the applicable hourly rates of the Receiver and his staff, and the expenses incurred from May 8, 201 through June 30, 2018 (the "Application Period"). The current bank balance is \$211,286.76. The Receiver proposes to pay at this time only 45% of the fees requested, \$127,959.75, to GJB and the Receiver, and reimburse \$5,186.55 representing 100% in out-of-pocket costs, leaving a holdback amount of \$156,395.25 until such time as the Receiver and this Court deem it prudent to make such payment. GJB has graciously agreed to the Receiver's proposed holdback.

15. KM hereby submits for approval its invoice for \$5,948.98 in fees for 23.80 hours of service during the period commencing May 8, 2018 through and including June 30, 2018 and expenses in the sum of \$414.95. The invoice provided by KM reflects a 15% reduction on its

normal hourly rates.

16. Attached as Exhibit "B" is a detailed invoice from KM reflecting the time spent, the applicable hourly rates of Kapila and his staff, and the expenses incurred from May 8, 2018 through June 30, 2018. The Receiver proposes to pay KM only 45% of these fees as well, \$2,677.04, and to reimburse \$414.95 representing 100% of its out-of-pocket costs, leaving a holdback amount of \$3,271.94, until such time as the Receiver and this Court deem it prudent to make such payment. KM has graciously agreed to the proposed holdback.

## **II. WORK PERFORMED BY THE RECEIVER AND HIS PROFESSIONALS**

17. Most of the time for which compensation is being sought in this Application relates to the high level of activity required by the initial takeover of the Receivership Entities and the Receiver's efforts to secure and preserve receivership assets.

18. Upon being appointed on May 8, 2018, the Receiver and his professionals secured the Receivership Entities' operations at three locations; one in Deerfield Beach, FL, and two locations in Boca Raton, FL. The Receiver utilized GJB's information technology staff, as needed, to secure control, preserve access to technology-based aspects of the Receivership Entities' business, as well as to coordinate with the Plaintiff's information technology professionals to provide forensic computer services, including the extraction and forensic imaging of data from computer hard-drive servers and work stations located in the Receivership Entities' offices.

19. In addition, prior to executing on the TRO, the Receiver coordinated with the Plaintiff service of the TRO and an asset-freeze letter upon all banks and third parties that were reasonably anticipated to hold assets of the Defendants in order to prevent the dissipation of assets. The Receiver also prepared turnover demands, which he served with the TRO and asset-

freeze letters, in coordination with the Plaintiff, to credit card merchant processors and others who may have assets or information.

20. Since his appointment on May 8, 2018, the Receiver and his counsel have familiarized themselves with the business operations of the Receivership Defendants and other related entities by, among other things, reviewing documents and materials found at the Defendants' offices, or subsequently acquired, and interviewing numerous supervisory and staff-level employees, vendors, suppliers, business partners and customers of Defendants. The Receiver has also reviewed documents and media and conducted due diligence into the business and operational affairs of Receivership Entities.

21. The Receiver and his professionals have reviewed thousands of documents, interviewed 36 employees and key parties, interviewed 40-45 consumers, secured assets and information from multiple locations and served 93 third parties, including financial institutions, with demands for financial information, documents and asset freezes. As a result of the efforts of the Receiver and his professionals, the Receivership bank accounts currently have a balance of \$211,286.76. A detailed account of the initial work done by the Receiver and his professionals, as well as the Receiver's preliminary findings, is contained in the Receiver's Corrected First Interim Report filed on June 6, 2018. [ECF No. 57].

22. The Receiver and GJB have performed their duties as required under the PI, including necessary steps to secure and preserve the Receivership Defendants' information systems containing the Receivership Defendants' e-mail, file storage, telephone, customer resource management, and accounting systems. The Receiver has re-directed the Receivership Defendants' domain names to a receivership website, activated a toll-free hotline, and is in constant contact with consumers.

23. KM is currently assisting the Receiver with tax-related issues.

24. The Receiver's investigation has identified and continues to identify assets of the Defendants, their relatives, friends and related entities. *See* Receiver's First Interim Report. [ECF No. 57].

### III. MEMORANDUM OF LAW

25. This Court has broad powers to appoint a receiver and to award the receiver fees for his services and for expenses incurred by the receiver in the performance of his duties. *See 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.”); *see also Securities & Exchange Commission v. Elliott*, 953 F. Supp. 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties).

26. In determining attorneys' fees, a court must: (1) determine the nature and extent of the services rendered; (2) determine the value of those services; and (3) consider the factors set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d. 714 (5th Cir. 1974), abrogated on other grounds, *Blanchard v. Bergeron*, 489 U.S. 87, 109 S. Ct, 939, 103 L.Ed.2d 67 (1989). In *Johnson*, the court set forth twelve factors a court should consider in determining reasonableness of an attorneys' fees award in a particular case. They 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; (II) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Id.*, 488 F.2d at 717-719. The Eleventh Circuit adopted these *Johnson* factors in *Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988).

**A. APPLICATION OF THE JOHNSON FACTORS**

**1. The Time and Labor Required**

27. To date, the Receiver and his team have focused on identifying, marshaling, and preserving the assets of the Receivership Estate, and preparing the First Interim Report, as well as learning and evaluating the Receivership Entities' businesses to determine the best course to maximize the return to the Receivership Estate. Based upon the scope and complexity of the issues associated with the Receiver discharging his obligations under the PI, this appointment has been extremely time intensive.

28. The Receiver's team secured the Corporate Defendants' known offices locations at 550 Fairway Drive, #104, Deerfield Beach and 4730 N.W. 2<sup>nd</sup> Ave., Suite 200, Boca Raton, FL. The Receiver utilized GJB's information technology staff, as needed, to secure control, preserve access to technology-based aspects of the Receivership Entities' business, as well as to coordinate with the Plaintiffs' information technology professionals to provide forensic computer services, including the extraction and forensic imaging of data from computer hard drive servers and work stations located in the Receivership Entities' offices.

29. The Receiver and his professionals have followed up on all asset freeze letters issued by the FTC and the Receiver served the asset freeze order on additional financial institutions and third parties identified in the investigation by the Receiver of the Receivership Entities. The Receiver has opened new bank accounts, and demanded and obtained the return of

funds from a variety of transferees. Additionally, the Receiver's team has spent days reviewing and analyzing the information found within the corporate offices.

30. The Receiver has also taken the necessary steps to secure and preserve the Receivership Defendants' information systems containing the Receivership Defendants' e-mail, file storage, telephone, customer resource management, and banking systems. The Receiver has re-directed six of eight Receivership Defendants' domain names to a receivership website, [www.pointbreakreceivership.com](http://www.pointbreakreceivership.com). The Receiver has also activated a toll-free hotline to receive calls from Defendants' customers, 1 (844) 635-1608, and is interviewing callers and maintaining a log of such calls.

31. The Receiver's team has gathered and analyzed voluminous investigative materials and electronic records. Those records include documents: (1) reflecting the misconduct described in the FTC's Complaint and the Receiver's First Interim Report; (2) financial records identifying bank accounts and credit card processing accounts; (3) describing Defendants' business enterprise; (4) providing leads to additional assets; (5) researching and handling immediate issues related to pending litigation involving the Receivership Entities; and (6) establishing the Receiver's right to bring those assets and companies within the Receivership.

32. The Receiver has become a *de facto* repository of electronic data in this case and is working with all parties to provide copies of electronic data in its possession.

33. While the Receiver and his professionals always work with a cost/benefit equation in mind as to each task, in the general context of litigation and, more specifically, in the administration of receiverships, the Receiver must sometimes pursue work that does not immediately present a quick benefit. However, the Receiver and his professionals know that they are spending consumers' money and are determined to pursue only those tasks that are

essential to completing the tasks assigned by the Court and to maximizing consumer recovery.

34. Because the early days of a receivership are filled with time-sensitive tasks — quickly identifying and securing assets, gathering and processing information necessary to learn the Defendants' business — initial fee applications often seek reimbursement of more fees and expenses than later applications. The same is true of this application. The Receiver's work during this billing period has established a level of stability that will likely allow the Receiver to continue to work at a pace that requires fewer hours and fewer members of his team. The narrative description in this Application and the exhibits attached evidence the time and labor employed in proceeding with this case.

**2. The Novelty and Difficulty of the Questions Presented**

35. Although these types of cases are all too common, at the onset, the Receiver is faced with the arduous task of understanding the business of the Receivership Entities, taking control of the Receivership Entities' books and records, and locating and securing physical assets and accounts. Here, these tasks have been extremely work intensive based upon the scope and complexity of the factual and legal issues presented. Indeed, by its very nature, a receivership is unique and complex.

**3. The Skill Required to Perform the Legal Services Properly**

36. The Receiver possesses the requisite skills to perform the services of receiver in this matter. The Receiver is an attorney with 30 years of experience. The Receiver regularly represents parties in complex litigation and is AV rated by the Martindale Hubbell Attorney Directory. He currently serves as the court-appointed Receiver in a number of matters.

37. GJB and KM possess the requisite skills to represent the Receiver, and both firms have significant experience in representing fiduciaries in complex cases.

**4. The Preclusion of Other Employment by the Attorney due to Acceptance of the Case**

38. Although this case has required an extensive investment of professional and paraprofessional time, it has not been necessary for the Receiver, GJB or KM to turn away other work due to this assignment.

**5. The Customary Fee for Similar Work in the Community**

39. The hourly rates charged by the attorneys and accountants providing work to the Receiver, as well as the Receiver's hourly rate, are below the customary rates of the attorneys working on this case and below those charged by attorneys or accountants with comparable skills in the Southern District of Florida for similar work. The hourly rates charged have been discounted by GJB and KM for the benefit of the consumers.

**6. Whether the Fee is Fixed or Contingent**

40. The Receiver and his professionals' compensation in this matter is comprised of fixed discounted hourly rates subject to the final approval of this Court. The Court should consider that the Receiver; GJB and KM have assumed the risk of non-payment and delay in payment. At present, the Receiver is uncertain as to whether there will be sufficient funds available in this Receivership to make such payment. The Receiver continues his efforts to follow leads to other Receivership assets. These efforts will hopefully not only secure funds to fund the administration of the Receivership, but will also benefit consumers by bringing funds into the Receivership Estate that can be used for possible restitution at the conclusion of the case.

**7. Time Limitations Imposed by the Client or by the Circumstances**

41. The nature of this case has required careful time management by the professionals involved because of the need to resolve issues efficiently and economically. The speed required for quick identification of assets demands that the Receiver task many members of his team to

the case in the early weeks of the receivership. Consequently, the number of hours expended during the time covered by the initial fee application is usually higher than those in subsequent applications, during which the receivership can take on a slower pace. At that point, the Receiver will likely task fewer members of his team to the case, and those engaged will have to spend fewer hours per billing period on the case.

**8. The Amount Involved and Results Obtained**

42. Thus far, the Receiver has conferred a substantial benefit to the Receivership Estate by seizing, managing and protecting the Receivership's assets. As more fully described in the Receiver's First Interim Report, a significant portion of the Receiver's time during this billing period has been devoted to those tasks that relate to receivership assets and the limiting of receivership liabilities. As a result of the efforts of the Receiver and his professionals, the Receivership bank accounts currently have a balance of \$211,286.76.

**9. The Experience, Reputation and Ability of the Professionals**

43. The principal attorneys on this case are experienced professionals and litigators in the Southern District of Florida. The Receiver has 30 years of experience in civil litigation and is well-respected in the legal community. He served as Receiver in *SEC v. Creative Capital Consortium, LLC et al*, Case No. 08-81565-CIV-HURLEY/HOPKINS (S.D. Fl.). Judge Hurley has approved all of the Receiver's Fee Applications. Mr. Perlman also currently serves as Receiver in a case pending before Judge Federico A. Moreno, *FTC v. Jeremy Lee Marcus, et al*, Case No. 17-60907-CIV-Moreno (S.D. Fla.). Judge Moreno has approved the Receiver's Fee Application.

44. KM are experienced accountants well known in this community for representing and providing accounting, forensic accounting, and tax-related services to fiduciaries and others

for over 25 years. The principals of KM often serve as fiduciaries in cases similar to this case.

**10. The Undesirability of the Case**

45. The Receiver and the professionals under his authority are privileged to be involved in this case for the public benefit. However, based upon the real risk and possibility that professional fees may go unpaid, this case would be considered undesirable by many.

**11. Awards in Similar Cases**

46. The Receiver believes the fees and costs submitted to the Court for consideration in this Application are similar to those awarded in other receivership cases in the Southern District of Florida.

**VI. CERTIFICATION**

47. Pursuant to Local Rule 7.1.A.3, undersigned counsel hereby certifies that he conferred with counsel for Plaintiff, the FTC, and has provided a draft of this Application prior to filing this Application. The FTC has authorized the Receiver to state that it does not object to this Application. The undersigned likewise certifies that he has provided this Application to the Defendants or their counsel, but has not yet received their position. That information will be provided as soon as it is known.

**WHEREFORE**, the Receiver, Jonathan E. Perlman, Esq., respectfully requests this Court to enter an order granting this Motion for Award of Fees and Reimbursement of Expenses approving all fees and expenses reflected in Exhibit A and authorizing the payment of \$133,146.30 to GJB, and approving all fees and expenses reflected in Exhibit B and authorizing the payment of \$3,091.99 to KM. A proposed form of order is attached.

Respectfully submitted this 31st day of July, 2018.

s/Jonathan E. Perlman  
Jonathan E. Perlman, Esq., Receiver –

and

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 31, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record and entities identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/Jonathan E. Perlman  
Jonathan E. Perlman

**SERVICE LIST**

**Federal Trade Commission v. PointBreak Media, LLC, et al.**  
**USDC, SD Fla., Case No. 18-61017-CIV-ALTONAGA**

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*Counsel for Defendant Ricardo Diaz*

I further certify that, on July 31, 2018, a true and correct copy of the foregoing was also served on the parties listed below, which to the best of my knowledge are unrepresented by counsel, by the method indicated below:

Defendant DCP Marketing, LLC  
c/o Mitchell N. Roth (via email)  
(counsel for Registered Agent Dustin Pillonato)  
mroth@rothjackson.com  
Roth Jackson Gibbons Condlin, PLC  
8200 Greensboro Drive  
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Defendant Modern Source Media, LLC  
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Defendant Modern Internet Marketing LLC  
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Boynton Beach, FL 33426

Defendant Pointbreak Media, LLC  
c/o Gregory M. Garno (via email)  
(counsel for Temporary Receiver Jonathan Perlman)  
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[10675-007/2887938/2]

**Genovese Joblove & Battista, P.A.**

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 Employer ID# 65-0518134

Attn: Jonathan Perlman  
 Jonathan Perlman, as Receiver

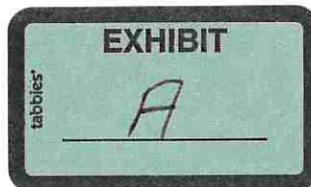
July 31, 2018  
 Inv. # 91940  
 File # 10675-007

Re: Jonathan Perlman, as Receiver / Pointbreak & Pilonato Receivership

Statement for Services Rendered Through Jun 30/18

**--- Legal Fees ---**

05/08/18	JEP	Phone conference with FTC. Review pleadings, evidence, TRO order, service instructions and many other documents. Edit interview outlines. Multiple meetings with team members in preparation for tomorrow take down.	8.50hr \$425.00/hr	\$3,612.50
05/08/18	GMG	Review papers and pleadings re receivership (1.); multiple meetings and conference calls re take down (2.); prepare for take down (1.5).	4.50hr \$410.00/hr	\$1,845.00
05/08/18	MKS	Review TRO; Questionnaire; Participate in phone conference; Strategy for tomorrow morning; Review Complaint and additional email questions for interview from Jonathan Perlman, Esq.	4.30hr \$355.00/hr	\$1,526.50
05/08/18	JMS	Review documents and prepare for initial access.	7.00hr \$280.00/hr	\$1,960.00
05/08/18	TVV	Review documents and prepare for immediate access May 9th.	7.00hr \$400.00/hr	\$2,800.00
05/08/18	HLH	Communications and document review regarding takedown prep (1.2); Review asset turnover targets and draft turnover letters for same (1.0)	2.20hr \$360.00/hr	\$792.00
05/08/18	MB	Conference Call with J. Perlman and team to discuss takedown	0.50hr \$210.00/hr	\$105.00
05/08/18	BPB	Analysis of materials and participation in conference call for purpose of preparing for Receivership takeover of Defendants' business locations.	2.50hr \$230.00/hr	\$575.00



05/08/18	CBH	Attention to new case and documents received; calendar deadlines; receipt and review of bank list; telephone call regarding receivership; print documents for takedown; meeting with T. Van Vliet regarding same.	1.50hr \$125.00/hr	\$187.50
05/09/18	JEP	Point Break Receivership- prepare, meet and direct Boca Raton police and BSO, execute on take down, direct takeover of operations, interview employees, communications with counsel, direct sending of additional asset freeze and turnover letters as appropriate, change locks, obtain control over CRM systems (Sales Force and Quick), Google control; review papers and documents on premises.	14.00hr \$425.00/hr	\$5,950.00
05/09/18	GMG	Travel to and attend take down; multiple employee interviews; review documents; internal meetings; attention to issues re turnover demands.	11.00hr \$410.00/hr	\$4,510.00
05/09/18	MKS	Assist with takedown; Interview witnesses at the Boca Raton location.	8.00hr \$355.00/hr	\$2,840.00
05/09/18	JMS	Execute TRO, interview employees, and conduct initial access.	10.00hr \$280.00/hr	\$2,800.00
05/09/18	HLH	Handle issues related to asset freeze and turnover letters, numerous communications regarding same	2.50hr \$360.00/hr	\$900.00
05/09/18	TVV	Prepare for and assist in immediate access by Receiver per Court Order access follow ups.	10.00hr \$400.00/hr	\$4,000.00
05/09/18	MB	Travel from Miami to Broward Police Station and back; Takedown of Deerfield Beach office; Interview employees of receivership entities; review receivership entity documents; take inventory; secure premises	14.00hr \$210.00/hr	\$2,940.00
05/09/18	BPB	Prepare for and attend receiver takeover of Boca Raton site; interview employees and coordinate takeover of office.	8.00hr \$230.00/hr	\$1,840.00
05/09/18	BPB	Prepare draft summary of employee interviews.	1.50hr \$230.00/hr	\$345.00
05/09/18	JPB	Takedown activities at NBL/MSM/DPC facility located at 550 Fairway Drive, Suite 104, Deefield Beach, FL 22331. Conducted interviews of employees, search through documentation found on site and discussed findings with Receiver team and attorneys from the FTC.	14.00hr \$210.00/hr	\$2,940.00
05/09/18	CBH	Attention to new case; send TRO order to all banks via e-mail and facsimile; preparation and send out turnover demands to various defendants and third parties; multiple calls with counsel; organization of documents; calendar deadlines.	3.00hr \$125.00/hr	\$375.00

05/09/18	CE	Briefing at Broward Sheriff's Office in Deerfield Beach prior to takedown. Attendance and assistance with the takedown of Pointbreak Media, LLC, et al. at the Deerfield Beach site. Assist with employee interviews, copy/scan employee drivers licenses, call scripts and other documents maintained at the site. Meetings with FTC and GJB Receivership team.	11.00hr \$85.00/hr	\$935.00
05/10/18	JEP	Communications regarding scheduling of Molina, Carver, Pocker interviews, with counsel and with opposing counsel (phone call and email with counsel Roth). Team meeting, begin organizing information. Send out additional asset freeze and turnover demands. Continue to seek control over companies, including incoming phone lines and Boca Ytel. Work on obtaining control/imaging of cloud data for email accounts of Receivership Entities. Prepare ehounds for download of information from email accounts. Communications re same. Review phone recordings of customer calls from yesterday.	8.30hr \$425.00/hr	\$3,527.50
05/10/18	GMG	Continue working on turnover/asset freeze letters (1.); internal meetings re same (1.); call with M. Roth (.3); attention to issues re third party turnover and document production (.7).	3.00hr \$410.00/hr	\$1,230.00
05/10/18	MKS	Inspect Broken Sound premises; Coordinate with landlord for MB Key (Boca); Communication with vendors regarding production letters; Assist with drafting additional asset freeze notice.	7.90hr \$355.00/hr	\$2,804.50
05/10/18	TVV	Receipt, review and respond to multiple emails from GJB Receivership team; Receipt, review and respond to emails and attachments from FTC; Multiple communications with Barry Rodeman.	5.20hr \$400.00/hr	\$2,080.00
05/10/18	MB	Meeting with receivership takedown team for debrief	0.40hr \$210.00/hr	\$84.00
05/10/18	MB	Prepare detailed interview notes of employees of receivership entities	1.70hr \$210.00/hr	\$357.00
05/10/18	MB	Meeting with J. Perlman regarding takedown and Public Reputation; research public records of Public Reputation to determine whether it is related to a receivership entity	0.50hr \$210.00/hr	\$105.00
05/10/18	BPB	Continue work on summary of employee interviews and narrative to be incorporated into receiver's initial report.	3.50hr \$230.00/hr	\$805.00
05/10/18	BPB	Follow-up teleconference regarding summary of takedown and tasks to be accomplished.	0.80hr \$230.00/hr	\$184.00
05/10/18	JPB	Review asset freeze letters to financial institutions. Revise and draft asset freeze letters for non-financial institution third parties.	1.30hr \$210.00/hr	\$273.00
05/10/18	JPB	Debriefing with Receiver team to discuss takedown in Broward and Palm Beach counties.	0.80hr \$210.00/hr	\$168.00

05/10/18	JPB	Phone call with Ivan Lopez regarding events that took place at the home of Defendant Ramsey shortly after service of process on Defendant Pillonato. Draft affidavit to be signed by Mr. Lopez.	1.10hr \$210.00/hr	\$231.00
05/10/18	JPB	Draft correspondence to Mizner Grand Realty and Florida Legal LLC regarding TRO and asset freeze.	0.40hr \$210.00/hr	\$84.00
05/10/18	JPB	Phone call with Registered Agent of Mizner Grande Realty to discuss their cooperation in turning over documents related to business done with DCP Marketing LLC.	0.20hr \$210.00/hr	\$42.00
05/10/18	JPB	Review of notes and documents related to interviews conducted of Chris Paruch; Adam Bonder; Drew Jackson; and Josh Goldstein at 550 Fairway Drive location.	3.10hr \$210.00/hr	\$651.00
05/10/18	CBH	Attention to organization of documents; send out Bank Asset Freeze letters; preparation of bank chart; send out additional turnover letters to third parties; telephone conference with team regarding status.	3.50hr \$125.00/hr	\$437.50
05/11/18	JEP	Obtain and review inventory of Boca and Deerfield offices. Set up interview with Roth clients Pillonato and Ramsey. Multiple correspondence re same. Receipt of email cancelling meeting on grounds of 5th amendment. Receipt of email regarding refusal to turn over computers taken by Pillonato and Ramsey from house per affidavit of process server. Direct and confirm lock down of various emails and websites, determine what is not under control and follow up on same. Download data, or provide to FTC for their copying. Review multiple memos by team memos on assortment of issues and direct follow up. Review first of reports of phone calls made by offices during last week of being opening, including representations regarding affiliation with Google and impending loss of listing. Continue to send out tro and turnover demands. Receipt of responses and follow up including from Stripe.	5.00hr \$425.00/hr	\$2,125.00
05/11/18	GMG	Attention to issues re turnover, asset freeze and expansion of receivership; review Roth letter.	1.20hr \$410.00/hr	\$492.00
05/11/18	MKS	Receipt and reveiw correspondence from Len Gordon; Receipt and review correspondence from ET Archuleta; Draft response; Exchange correspondence with Broken Sound landlord; Start draft interview summary.	5.60hr \$355.00/hr	\$1,988.00
05/11/18	JMS	Attention to securing receivership assets, et al.	2.00hr \$280.00/hr	\$560.00
05/11/18	TVV	Receipt, review and respond to multiple emails regarding turnover and other follow up from access; Multiple communications with Barry Rodeman; Follow up regarding electronic data devices.	5.80hr \$400.00/hr	\$2,320.00
05/11/18	MB	Review documents collected from Deerfield Beach office for information related to assets or operations.	1.20hr \$210.00/hr	\$252.00
05/11/18	JPB	Review and catalogue documents found at the 550 Fairway Drive location. Draft memo with findings, including items	5.10hr \$210.00/hr	\$1,071.00

tabbed as hot docs for further review.

05/11/18	CBH	Attention to organization of bank turnover chart; update freeze letter to include Pinnacle Presence; send via Federal Express and e-mail; organization of documents in system; meeting with T. Van Vliet and M. Streeter regarding same.	2.10hr \$125.00/hr	\$262.50
05/14/18	JEP	Communications re representation of Carver and Pocker. Communications re: Roderman decision not to represent following acceptance of service. Confirmation of changing numerous passwords and control over internet and domains, emails and phone lines. Attention to matters concerning Ytel numbers and 1-800 numbers. Follow up on freezing voice mails. Set up interviews with Molina and Carver. Collection and review of hot docs secured from Boca and Deerfield locations. Meetings with team re outstanding items to secure, interviews to be made, follow up on asset freeze with financial institutions, begin work in interim report. Work on organizational chart.	9.50hr \$425.00/hr	\$4,037.50
05/14/18	GMG	Attention to issues with receiver (.4); exchange emails with Cove re interviews (.2); review Rubino letter (.2); exchange emails with Roth re interviews (.2).	1.00hr \$410.00/hr	\$410.00
05/14/18	TVV	Receipt, review and respond to emails regarding interviews; Telephone conference with TL regarding Steffan Molina; Communications with Daniel Carver regarding interview; Follow up to take down for report.	5.40hr \$400.00/hr	\$2,160.00
05/14/18	JMS	Attention to issues regarding new receivership, work on interim report issues and scheduling interviews.	2.40hr \$280.00/hr	\$672.00
05/14/18	MB	Continue reviewing documents scanned from Deerfield Beach office and prepare memorandum	0.30hr \$210.00/hr	\$63.00
05/15/18	JEP	Work on compiling information from take downs and data received, input into organizational chart, obtain affidavit from process server and incorporate into outline of interim report, meet with team and go over all assignments. Arrange additional interviews. Phone call with FTC re cooperation on obtaining and imaging Receivership property. Obtain from FTC updates on counsel for various parties in order to contact same. Work on preserving Ytel data, including communications with its general counsel. Communications with tax accountant for setting up accounts and fiduciary filings.	8.40hr \$425.00/hr	\$3,570.00
05/15/18	GMG	Internal meeting with receiver (1.5); various conference calls (1.); call with M. Roth re Pillonato and Ramirez (.3).	2.80hr \$410.00/hr	\$1,148.00
05/15/18	TVV	Conference with Jesus Suarez, Esq. regarding interviews; Receipt, review and respond to emails from team.	0.70hr \$400.00/hr	\$280.00
05/15/18	JMS	Attention to issues regarding new receivership, work on interim report issues and scheduling interviews.	3.60hr \$280.00/hr	\$1,008.00
05/15/18	MKS	Exchange emails with GC, EJ, Archuleta; Telephone conference with AJ Archuleta (plus prepared for telephone conference); Draft Subpoena to advice local; Sort mail issue at Boca Raton office; Conference with Jesus Suarez, Esq. and Carolyn Esser; Draft subpoena DT for Dan Carver and Michael Hayhall; Telephone conference with Regions Bank regarding Asset Freeze and Turnover (Dustin Pillonato	5.80hr \$355.00/hr	\$2,059.00

		account closed August, 2017); Review email response from EVO regarding expanded search and Regions search; Review transcript; Telephone conference with Laver and Debi (from Boca Raton)		
05/15/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	3.00hr \$210.00/hr	\$630.00
05/15/18	MB	Meeting with PointBreak Receivership Team to discuss preparing Interim Report	2.60hr \$210.00/hr	\$546.00
05/15/18	MB	Review recordings of customer calls with J. Suarez; prepare instructions to review and transcribe recordings	0.40hr \$210.00/hr	\$84.00
05/15/18	CBH	Attention to service of asset freeze letter to add additional entities; meeting with G. Garno regarding same; preparation of subpoena to advice local; meeting with M. Streeter regarding same; update charts.	1.50hr \$125.00/hr	\$187.50
05/16/18	JEP	Work on interim report, Interview Daniel Carver.	8.50hr \$425.00/hr	\$3,612.50
05/16/18	TVV	Attention to Molina / Carver representation and interviews; Receipt, review and respond to multiple emails from Receivership team; Telephone conference with Daniel Carver; Telephone conference with RE ; Meeting with Jonathan Perlman, Esq., Jesus Suarez, Esq., Maxine Streeter, Esq., and Benjamin Bean, Esq. re: interviews and receivership issues.	8.40hr \$400.00/hr	\$3,360.00
05/16/18	MKS	Continue fact finding and reviewing documents produced by Defendant's and third parties.	6.90hr \$355.00/hr	\$2,449.50
05/16/18	GMG	Attention to issues re registering TRO in other districts (.5); review various correspondence from third parties re turnover/asset freeze (.5); attention to receivership issues re background interviews and key witnesses (.5).	1.50hr \$410.00/hr	\$615.00
05/16/18	JMS	Meeting with Receiver and Receivership team to discuss interviews and administration of Receivership case, respond to immediate action items and secure property of the receivership estate.	4.70hr \$280.00/hr	\$1,316.00
05/16/18	MB	Review Audio Recordings between Employees of Receivership Entities and customers; transcribe recordings to include in the Interim Report	0.40hr \$210.00/hr	\$84.00
05/16/18	MB	Meeting with Receiver to discuss preparation of interim report	0.40hr \$210.00/hr	\$84.00
05/16/18	MB	Prepare Interim Report	1.10hr \$210.00/hr	\$231.00
05/16/18	BPB	Teleconference with J. Bado and M. Bild regarding interviews of employees at Boca office location; revise and supplement memorandum summarizing interviews.	1.00hr \$230.00/hr	\$230.00
05/16/18	BPB	Receipt and review of numerous email communications related to upcoming interviews.	0.30hr \$230.00/hr	\$69.00

05/16/18	BPB	Meeting with receiver and counsel regarding strategy development for various tasks to be completed.	2.00hr \$230.00/hr	\$460.00
05/17/18	JEP	Prepare for and interview Michael Mayhall (listed MGR of Pinnacle Presence LL). Draft memo re same. Send out clarification letters to credit card companies that asset freeze does not extend to extensions of credit.	8.30hr \$425.00/hr	\$3,527.50
05/17/18	MKS	Attend Michael Mayhall's interview and draft summary.	8.40hr \$355.00/hr	\$2,982.00
05/17/18	GMG	Attention to receivership issues (.7); call with E. Mendelsohn re credit card companies (.3).	1.00hr \$410.00/hr	\$410.00
05/17/18	TVV	Prepare for and conduct Steffan Molina's interview.	8.40hr \$400.00/hr	\$3,360.00
05/17/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	10.30hr \$210.00/hr	\$2,163.00
05/17/18	MB	Continue preparing First Interim Report	1.00hr \$210.00/hr	\$210.00
05/17/18	MB	Review scanned documents during takedown of Boca Raton office re: first interview report.	1.40hr \$210.00/hr	\$294.00
05/17/18	BPB	Preparation for interviews of M. Pocker and D. Carver; analysis of additional email communications regarding various issues.	0.90hr \$230.00/hr	\$207.00
05/17/18	CBH	Attention to interviews with defendants; calendar; meeting with J. Perlman and FTC regarding freeze of bank accounts; send letters to credit card companies regarding individual cards; send information on Pocker laptop; organization of documents in drive; meeting with T. Van Vliet regarding same.	2.00hr \$125.00/hr	\$250.00
05/18/18	JEP	Meet individually with various team members and go over their assignments for Interim Report and oversee putting together of information and drafting of same, including with respect to review of all documents located at both locations, information being obtained from interviews, information sought and being received from recipients of turnover demands, results of research into named and unnamed receivership entities. Prepare exhibits for Interim Report.	8.50hr \$425.00/hr	\$3,612.50
05/18/18	MKS	Continue to assist with Receiver report and investigate ties between defendant entities; Numerous telephone conference with Jonathan Perlman, Esq. and team; Team conference call.	7.50hr \$355.00/hr	\$2,662.50
05/18/18	GMG	Call with BOA re freeze order/FTC (.3); internal meeting re interim report (1.); work on interim report (1.); prepare letter to Roth re Pillanoto and Ramsey (.4); meet with receiver re pending issues (.3); call with FTC (.4).	3.40hr \$410.00/hr	\$1,394.00
05/18/18	TVV	Prepare for and conduct Daniel Carver's interview.	6.50hr \$400.00/hr	\$2,600.00

05/18/18	JMS	Attention to receivership matters.	0.70hr \$280.00/hr	\$196.00
05/18/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	8.80hr \$210.00/hr	\$1,848.00
05/18/18	MB	Continue Preparing First Interim Report	4.00hr \$210.00/hr	\$840.00
05/18/18	MB	Review documents scanned during the takedown to potentially include to the First Interim Report	4.00hr \$210.00/hr	\$840.00
05/18/18	BPB	Prepare for and attend interview of M. Pocker.	2.50hr \$230.00/hr	\$575.00
05/18/18	BPB	Prepare for and attend interview of D. Carver.	2.50hr \$230.00/hr	\$575.00
05/18/18	BPB	Draft summary of interview of M. Pocker.	1.00hr \$230.00/hr	\$230.00
05/18/18	BPB	Draft summary memorandum of interview of D. Carver.	1.00hr \$230.00/hr	\$230.00
05/18/18	BPB	Teleconference regarding deadline for Receiver's Interim Report and necessary tasks to be completed.	0.80hr \$230.00/hr	\$184.00
05/18/18	CBH	Attention to research of companies; pull accurint reports for M. Streeter; receipt and review of bank documents; organization; attention to unseal of case; add attorneys for electronic notice; attend conference call regarding receiver's report and upcoming hearing.	2.00hr \$125.00/hr	\$250.00
05/19/18	GMG	Review various motions filed in connection with PI hearing (1.); exchange emails re PI hearing and motions (.5); attention to issues re 1st interim report (.5).	2.00hr \$410.00/hr	\$820.00
05/19/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	4.80hr \$210.00/hr	\$1,008.00
05/19/18	MB	Continue preparing First Interim Report; review sales scripts for possible misrepresentations; review documents found at the offices	3.40hr \$210.00/hr	\$714.00
05/20/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	1.70hr \$210.00/hr	\$357.00
05/21/18	JEP	Draft and edit interim report. Review draft motion and proposed order on parties' request to extend PI hearing date. Attend interview with Steffan Molina, draft memo re same. Phone call with T. Van Vliet re action items as a result. Review order extending PI hearing to June 6; order denying motion in limine, order allowing live testimony.	8.50hr \$425.00/hr	\$3,612.50
05/21/18	MKS	Attend interview of Steffan Molina; Continue to investigate Cardinal; Group and ties to Ricardo Diaz.	8.20hr \$355.00/hr	\$2,911.00

05/21/18	GMG	Review joint motion to continue and order (.3); attention to issues re 1st interim report (.5); review various court orders (.4); attention to issues re turnover demands and third party document production (.5).	1.70hr \$410.00/hr	\$697.00
05/21/18	TVV	Prepared and conduct interview of Steffan Molina.	8.30hr \$400.00/hr	\$3,320.00
05/21/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	3.80hr \$210.00/hr	\$798.00
05/21/18	MB	Organize and Compile exhibits for First Interim Report	0.40hr \$210.00/hr	\$84.00
05/21/18	MB	Continue preparing First Interim Report	2.30hr \$210.00/hr	\$483.00
05/21/18	BPB	Follow-up regarding login and password information and return of M. Pocker cell phone.	0.50hr \$230.00/hr	\$115.00
05/21/18	BPB	Follow-up with counsel for M. Pocker regarding stale/incorrect passwords, and other issues.	0.30hr \$230.00/hr	\$69.00
05/21/18	CBH	Attention to additional turnover demands; update demand chart; attention to continuation of preliminary injunction hearing; calendar; attention to summons; calendar answer deadline; pull report for B. Stockdale; e-mail correspondence with M. Streeter regarding same.	2.00hr \$125.00/hr	\$250.00
05/22/18	JEP	Respond to Rule 26f participation questions, work on interim report, continue gathering information including securing and imaged from Salesforce and Quickbase CRM systems. Meet with Jp Bado and Laise and work on updating information for interim report regarding Ytel and recordings for various entities. Multiple calls and meetings with M Streeter, work on obtaining and distilling information for Interim Report. Set up additional interviews, edit interview notes. Review additional documentation and update org chart. Communications with FTC. Communications with Defendants' counsel, including request for explanation and information regarding Ramsey and Pillonato assertion of 5th Amendment privilege. Review and analysis of financial disclosures received from defendants. Continue to work toward obtaining DR information, including phone recordings and documents.	8.30hr \$425.00/hr	\$3,527.50
05/22/18	GMG	Exchange emails with M. Roth re turnover requests (.3); review interview notes (.3); review various court orders (.2); meet with receiver (.5); exchange emails with FTC re Rule 26 conference (.2); call with FTC re PI (.2).	1.70hr \$410.00/hr	\$697.00
05/22/18	MKS	Continue investigation into Ricardo Diaz and relationships with Defendants; Review financials, Track companies; Cardinal group and principles; Review Ricardo Diaz's tax returns; Find Beau Strickland and Bradley Stockdale; Contact Bradley Stockdale.	9.60hr \$355.00/hr	\$3,408.00
05/22/18	TVV	Telephone conference with Ricardo Diaz counsel.	0.40hr \$400.00/hr	\$160.00

05/22/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	3.00hr \$210.00/hr	\$630.00
05/22/18	CBH	Attention to court pleadings; calendar deadlines; attention to documents and inquiry from various banks and third parties; update chart; organization of documents.	0.80hr \$125.00/hr	\$100.00
05/23/18	JEP	Work on interim report, meet with Bado, Bild, Garno re same. Additional review of materials received in case, including documents, transcripts of recordings, exhibits in TRO papers, corporate documents. Discuss multiple issues for research by team members. Review Ramsey deposition transcript. Review information in preparation for meeting with RicardoDiaz. Phone calls and communications with Streeter and T in prep for same. Edit website contents.	8.00hr \$425.00/hr	\$3,400.00
05/23/18	GMG	Review lawsuits filed by Google (.4); call with FTC (.3); work on interim report (1.5); exchange emails with M. Roth (.2); work on website (.3); call with Fischer re Google website (.3).	3.00hr \$410.00/hr	\$1,230.00
05/23/18	TVV	Prepare for Ricardo Diaz's interview; Begin phone review.	6.50hr \$400.00/hr	\$2,600.00
05/23/18	JPB	Meet with G. Garno and J. Perlman to discuss Receiver's Interim Report.	2.00hr \$210.00/hr	\$420.00
05/23/18	MB	Meeting with J. Perlman, G. Garno and J.P. bado to discuss the First Interim Report	1.90hr \$210.00/hr	\$399.00
05/23/18	MB	Continue preparing First Interim Report; makes organizational changes to report; prepare memo regarding table of contents of interim report	1.40hr \$210.00/hr	\$294.00
05/23/18	MB	Prepare e-mail to Google counsel in pending litigation notifying counsel of the stay imposed by the preliminary injunction	0.10hr \$210.00/hr	\$21.00
05/23/18	CBH	Attention to sending additional turnover demands; pull accurint for Yates; receipt and review of documents from AMEX, PNC, Citibank, additional documents; organization; update chart; meeting with M. Streeter regarding same.	1.50hr \$125.00/hr	\$187.50
05/24/18	JEP	Prepare for and attend/take Ricardo Diaz interview with T. VanVliet and Maxine. Work on interim report.	8.20hr \$425.00/hr	\$3,485.00
05/24/18	GMG	Call with C. Erickson (.2); continue working on interim report (.8).	1.00hr \$410.00/hr	\$410.00
05/24/18	MKS	Ricardo Diaz interview and recap.	8.20hr \$355.00/hr	\$2,911.00
05/24/18	TVV	Prepare and conduct interview of Ricardo Diaz.	8.20hr \$400.00/hr	\$3,280.00
05/24/18	HLH	Review subpoena responses, communications regarding same	1.00hr \$360.00/hr	\$360.00

05/24/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	4.00hr \$210.00/hr	\$840.00
05/24/18	CBH	Attention to matters and documents involving R. Diaz interview; meeting with T. Van Vliet and M. Streeter regarding same.	0.80hr \$125.00/hr	\$100.00
05/25/18	JEP	Communication re potential PI with Diaz. Review Diaz notes and discuss with team. Work on interim report, meeting re same.	4.00hr \$425.00/hr	\$1,700.00
05/25/18	JEP	Receipt of copies of documents FTC copied at take down, discuss plan for bate stamping and tracking.	0.50hr \$425.00/hr	\$212.50
05/25/18	TVV	Attention to Ricardo Diaz phone; Receipt, review and respond to emails from Jay Bushman.	1.30hr \$400.00/hr	\$520.00
05/25/18	GMG	Review proposed bank subpoena (.4); review proposed schedules (.2).	0.60hr \$410.00/hr	\$246.00
05/28/18	JPB	Compile, review, and organize documents retrieved at Deerfield Beach and Boca Raton offices; supervise review and documentation of customer complaints received through 1-800 numbers; draft and revise Receiver's Interim Report.	2.40hr \$210.00/hr	\$504.00
05/29/18	JEP	Work on interim report. Obtain information from witness TE that Defendants are continuing to operate: Perfect Image Online is operating as of 5-25-18. Research and draft memo re Ricard Diaz involvement and intersections with other persons and entities. Obtain update on banks and direct letters to transfer funds to Receivership account immediately. Direct recovery of \$10k on deposit with Advensus. Review communications re financial disclosures overdue from Pillonato and Ramsey related entities. Communications with FTC re its responsibilities as to certain items and information.	8.30hr \$425.00/hr	\$3,527.50
05/29/18	MKS	Receivership- Letter; Telephone Conference with LM; Telephone Conference with FTC (Chris Erickson) Draft Bank Turnover Demand Letters; Telephone Conference with Michelle Ma re: Sales Force	5.20hr \$355.00/hr	\$1,846.00
05/29/18	BPB	Analysis of email from T. Van Vliet and attachment regarding receivership defendants attorney contacts.	0.30hr \$230.00/hr	\$69.00
05/29/18	BPB	Receipt and review of emails related to data obtained by FTC and issues related to setup of toll free numbers.	0.30hr \$230.00/hr	\$69.00
05/29/18	MB	Continue preparing interim report	1.50hr \$210.00/hr	\$315.00
05/29/18	CBH	Attention to service of A. Jones; calendar response deadlines associated; meeting with M. Streeter regarding audio files and EIN/SS numbers.	0.50hr \$125.00/hr	\$62.50

05/30/18	JEP	Communications regarding taint review on data received from defendants, review communications to counsel for defendants. Work on interim report. Review and discuss turnover motion for computers taken by Ramsey and Pillonato. Meet re discussions with banks and demands for transfer of funds to Receivership account. Review bank responses and direct follow up. Work on obtaining information regarding continuing Mastercard charges, multiple communications with team and with Mastercard due to problems with obtaining identity of acquirer/merchant banks processing charges. Research re: Alliance Security robocall and telemarketing history of violations and deceptive conduct involving individual defendants in this case.	5.60hr \$425.00/hr	\$2,380.00
05/30/18	TVV	Attention to Privilege Wall of Names; Communications Regarding Same; Receipt, Review & Respond to Emails from Maxine Streeter Regarding Correspondence	0.90hr \$400.00/hr	\$360.00
05/30/18	GMG	Exchange emails with Roth re disclosures (.2); review PI order (.3); review information re Ricardo Diaz (.3); review order (.1); call with Chase re turnover demand/asset freeze (.4); review turnover letter re banks (.2); meet with receiver re interim report (.5); review various response letters (.3).	2.30hr \$410.00/hr	\$943.00
05/30/18	MKS	Communications with Mastercard & Jonathan E. Perlman; Review Correspondence and confirm all Proper Entities have been served with Temporary Restraining Order and Asset Freeze	3.70hr \$355.00/hr	\$1,313.50
05/30/18	HLH	Detailed review of bank subpoena responses and consider issues regarding bank reconciliation	2.50hr \$360.00/hr	\$900.00
05/30/18	JPB	Revise draft of Receiver's Preliminary Report.	2.50hr \$210.00/hr	\$525.00
05/30/18	BPB	Receipt and review of numerous responses to TRO and asset freeze.	1.00hr \$230.00/hr	\$230.00
05/30/18	MB	Continue preparing First Interim Report; add section on interview with Ricardo Diaz	1.20hr \$210.00/hr	\$252.00
05/30/18	MB	Prepare motion to compel turnover and for an order to show cause against Defendants Dustin Pillonato and Justin Ramsey	3.60hr \$210.00/hr	\$756.00
05/30/18	CBH	Send letters to banks regarding turnover of freeze funds; meeting with M. Streeter regarding same; update chart; organization of documents.	1.00hr \$125.00/hr	\$125.00
05/31/18	JEP	Follow up on witnesses to interview; work on Interim report; work with TV on taint/wall off list of people; work on follow up communications with institutions to obtain monies to Receivership account, including Stripe and PNC. Multiple communications/letters with counsel Roth regarding his refusal to turn over funds in his trust account on behalf of Modern Spotlight. Communications with accountants re tax issues and records. Phone call with FTC re update on assets, compliance/noncompliance by various parties with demands for turnover.	6.50hr \$425.00/hr	\$2,762.50

05/31/18	GMG	Prepare letter to Roth re turnover of funds (.3); work on motion to compel (.5); exchange email with FTC re financials (.2); attention to issues re document protocol (.1); review various responses from third parties re asset freeze and document turnover (.3); review proposed turnover letters (.2); work on 1st interim report (.5); review Roth email (.1).	2.30hr \$410.00/hr	\$943.00
05/31/18	MKS	Monitor Turnover Demand Letters; Draft Demand to M.Roth Regarding 60k Transfer to Trust Account; Review Interim Report and Edit with Bank Info; Telephone Conference with MasterCard	7.20hr \$355.00/hr	\$2,556.00
05/31/18	JPB	Revise draft of Receiver's Preliminary Report. Prepare exhibits.	1.50hr \$210.00/hr	\$315.00
05/31/18	MB	Continue preparing First Interim Report	6.80hr \$210.00/hr	\$1,428.00
05/31/18	CBH	Send out turnover letters to Chase and Advensus; send corrective letters to BOA and Wells Fargo; meeting with M. Streeter regarding same; attention to organization of documents and update chart; attention to turnover demand to M. Roth.	1.00hr \$125.00/hr	\$125.00
06/01/18	JEP	Work on Interim report. Research re various items for report, including Sunbiz follow up, interview records, transcript records, correspondence re positions of various parties, joint scheduling report, motion by Pocker for monies to be released and other filings. Review motion for turnover of laptop and Louis Vitton bags. Discuss 5th Amendment issues and case law.	7.00hr \$425.00/hr	\$2,975.00
06/01/18	JEP	Work on tracking down employee/witness who reached out to talk, but has since ceased responding.	0.30hr \$425.00/hr	\$127.50
06/01/18	MKS	Review M. Pocker Computer; Numerous Telephone Conference with FTC; Review of BankRecords; Molina Entities and Paymentech Transfers	5.50hr \$355.00/hr	\$1,952.50
06/01/18	GMG	Review FTC discovery requests (.5); exchange emails with Roth re turnover of funds (.3); work on interim report (4.); review financial disclosures (.5); call with L. Johnson (.2); work on motion to compel (.8).	6.30hr \$410.00/hr	\$2,583.00
06/01/18	HLH	Research and communications regarding interview targets	1.20hr \$360.00/hr	\$432.00
06/01/18	MB	Continue preparing Motion to Compel Turnover of Laptops, Cellphones and Passwords or in the Alternative, an Order to Show Cause why Defendants Pillonato and Ramsey Should not be Held in Contempt of Court	2.00hr \$210.00/hr	\$420.00
06/01/18	MB	Legal research for Motion to Compel Turnover on whether the Fifth Amendment privilege against self-incrimination is a defense to refusing to produce alleged personal laptops that may contain incriminating evidence; meeting with J. Perlman (Receiver) and G. Garno discussing case law on the 5th Amendment privilege in the context of a motion to compel turnover of laptops	1.20hr \$210.00/hr	\$252.00

06/01/18	CBH	Attention to additional turnover letters; update chart; receipt and review of FTC's discovery to Ramsey and Pillonato; calendar response deadlines; attention to documents received from AMEX.	1.00hr \$125.00/hr	\$125.00
06/02/18	GMG	Work on contempt motion (2.); work on interim report (5.)	7.00hr \$410.00/hr	\$2,870.00
06/03/18	JEP	Work on interim report; direct follow up on open items.	3.00hr \$425.00/hr	\$1,275.00
06/03/18	MB	Continue legal research for motion to compel turnover on whether the Fifth Amendment protects defendant from producing his laptop	2.00hr \$210.00/hr	\$420.00
06/04/18	JEP	Research and draft First Interim Report. Edit same. Receipt of multiple checks to Receiver from PNC and Roth Firm. Notify team. Deposit. Research re source of Ramsey house payments. Follow up on Diamond Exchange purchases and contact re deposits and jewelry held. Obtain information about complaint by Boca Raton office landlord and direct immediate response.	9.50hr \$425.00/hr	\$4,037.50
06/04/18	GMG	Review Roth letter re turnover of funds (.2); work on interim report (4.5); continue reviewing disclosures by defendants (.5); finalize motion for turnover and order to show cause (.5); meet with receiver (1.); call with E. Mendelsohn re motion for turnover (.2).	6.90hr \$410.00/hr	\$2,829.00
06/04/18	MKS	Review final disclosures from Pillonato and Ramsey and entities; Provide information regarding subpoenaed documents and bank information for Receivers's Report; Send Freeze and TRO to T.G. Wentworth; Communicate with T.G.Wentworth; Diamond exchange Turnover demand; Receipt and review correspondence and document production from EVO payments; First Data research and contact witness Tammy Serrano; Edit Interim Report.	8.20hr \$355.00/hr	\$2,911.00
06/04/18	HLH	Research interview targets and related communications	0.60hr \$360.00/hr	\$216.00
06/04/18	MB	Continue preparing motion to compel turnover and for an order to show cause	1.80hr \$210.00/hr	\$378.00
06/04/18	MB	Continue preparing interim report	3.00hr \$210.00/hr	\$630.00
06/04/18	JPB	Meet with M. Bild and J. Perlman to discuss revisions to Receiver's Preliminary Report.	0.40hr \$210.00/hr	\$84.00
06/04/18	CBH	Receipt and review of documents from Evo; organization; receipt and review of financial statements; save in system; send demand letters to JP Wentworth and Diamond Exchange; update chart; review of pending litigation for defendants; meeting with M. Streeter and G. Garno regarding same.	1.00hr \$125.00/hr	\$125.00
06/05/18	JEP	Review and provide comments to proposed Molina stipulation on PI. Draft Receivers's Report.	8.80hr \$425.00/hr	\$3,740.00

06/05/18	TVV	Attention to first interim report; Pull account of production materials.	8.60hr \$400.00/hr	\$3,440.00
06/05/18	GMG	Review proposed stipulated PI for motion and Perfect Online image (.6); call with FTC re same (x3) (.8); work on interim report (6.); review hearing notice re motion to compel turnover (.1); exchange emails with Roth re turnover (.3); begin reviewing cases for turnover hearing (.5).	8.30hr \$410.00/hr	\$3,403.00
06/05/18	MKS	Edit and finalize for filing Receiver's Interim Report.	9.20hr \$355.00/hr	\$3,266.00
06/05/18	MB	Continue preparing interim report and assembling exhibits for filing this evening	9.00hr \$210.00/hr	\$1,890.00
06/05/18	JPB	Meet with M. Bild to discuss revisions to Receiver's Preliminary Report. Review exhibits and proof draft.	1.90hr \$210.00/hr	\$399.00
06/05/18	BPB	Review of scripts gathered at Boca office for purpose of identifying relevant business entities.	1.50hr \$230.00/hr	\$345.00
06/05/18	BPB	Conference with M. Streeter regarding details related to interviews of M. Pocker and D. Carver.	0.30hr \$230.00/hr	\$69.00
06/05/18	BPB	Analysis of communication from J. Perlman regarding R. Diaz.	0.50hr \$230.00/hr	\$115.00
06/05/18	CBH	Attention to exhibits in Receiver's report; multiple meetings regarding same; request maps of locations from FTC; meeting with M. Streeter regarding same; scan report to T. Van Vliet; final preparation and filing notice of additional entities as defendants; meeting with G. Garno regarding preliminary injunction hearing; final preparation and filing receiver's interim report.	3.10hr \$125.00/hr	\$387.50
06/06/18	JEP	Review Interim Report, edit for corrected version and file. Prepare for hearing, review files, pleadings. Review PI entered today. Attend hearing.	10.50hr \$425.00/hr	\$4,462.50
06/06/18	GMG	Prepare notice re additional receivership entities (.4); review supplemental brief filed by FTC (.6); research 5th Amendment issues re hearing on motion for turnover (2.5); prepare for PI hearing (1.); attend hearing (3.); prepare corrected interim report (1.).	11.00hr \$410.00/hr	\$4,510.00
06/06/18	TVV	Corrections to report; Telephone conference with Jonathan Perlman, Esq.	0.80hr \$400.00/hr	\$320.00
06/06/18	MB	Legal research on whether a receiver is a state actor for purposes of the Fifth Amendment	1.30hr \$210.00/hr	\$273.00
06/06/18	MB	Review Amended Interim Report for references to Defendant Michael Pocker; prepare summary of Pocker references for preliminary injunction hearing	1.40hr \$210.00/hr	\$294.00
06/06/18	MB	Attend Preliminary Injunction Hearing with J. Perlman and G. Garno	3.30hr \$210.00/hr	\$693.00
06/06/18	CBH	Final preparation, review of and filing receiver's corrected report; attention to hearing; pull calendar and call JA regarding hearing on calendar.	1.00hr \$125.00/hr	\$125.00

06/07/18	GMG	Review order on motion to compel (.2); review NOA (.1); review proposed PI submitted to the court (.5); review PI (.5).	1.30hr \$410.00/hr	\$533.00
06/07/18	TVV	Receipt, review and respond emails from opposing counsel regarding court Orders.	0.40hr \$400.00/hr	\$160.00
06/07/18	MKS	Follow up with J.G. Wentworth; Review mail received at Boca Raton and Deerfield location.	1.10hr \$355.00/hr	\$390.50
06/08/18	GMG	Review order to show cause (.1); exchange emails with Roth re turnover (.2); exchange emails with FTC re turnover (.2); review notice of compliance (.2); attention to issues re recent customer payments and refunds (.4).	1.10hr \$410.00/hr	\$451.00
06/08/18	TVV	Attention to apparent use of domain names post takedown.	1.40hr \$400.00/hr	\$560.00
06/08/18	MKS	National Business listing issue; Telephone conference with victim Dr. Janelle Beckford.	1.40hr \$355.00/hr	\$497.00
06/11/18	JEP	Review and respond/direct team on follow up re obtaining control over last gmail accounts. Victim Janale Beckford interview summary, identification of issues regarding June charges and refunds in violation of stay apparently by Wells Fargo merchant processor, emails re same from support@nationalbusinesslistings.com. Directed follow up and shut downs of same. Review Public Reputation complaints and Small Business Solutions complaints and research and follow up same. Receipt of check from Chase, deposit same. Review Chase and other bank responses to demand for information with TRO, direct responses.	5.20hr \$425.00/hr	\$2,210.00
06/11/18	GMG	Attention to issues re document protocol (.4); attention to issues re consumer interviews with post receivership business activity (.4); attention to matters re production by third parties (.4); attention to issues re consumer calls and possible new entities (.4).	1.60hr \$410.00/hr	\$656.00
06/11/18	MKS	Follow up with Wells Fargo regarding Dr. Beckford and NBL charges; Assist FTC with 12,500.00 release to Diaz's attorney; Continue to follow up regarding NBL and research operations.	6.10hr \$355.00/hr	\$2,165.50
06/12/18	JEP	Meet with team and discuss various time sensitive matters. Identify possible additional asset freeze violations and accounts subject to freeze, follow up in shutting same down. Direct analysis of all property at Boca and Deerfield locations and develop plan for liquidation, and vacation of properties to reduce expense and to seek return of deposits. Work on plan to collect and analyze bank records with M. Streeter and H. Heather. Direct re communications with Yates, demands for return of property, preparation and setting of his deposition. Communications with FTC re possible additional defendants.	3.80hr \$425.00/hr	\$1,615.00
06/12/18	GMG	Review order to show cause (.2); exchange emails re Yates (.3); review responses by third parties to turnover demands (.3); review 5th amendment law (.3).	1.10hr \$410.00/hr	\$451.00

06/12/18	MKS	Review Chase issue and follow up regarding additional entities; Telephone conference with V. Yates; Follow up with Jonathan Perlman, Esq.; Draft Ex A to Yates Subpoena; Review Bank of America turnover issue and confirm all new entities served on financial instructions; Telephone conference with FTC regarding Bank of America asset freeze violation and bank account sources for deposits.	5.20hr \$355.00/hr	\$1,846.00
06/12/18	TVV	Attention to interviews to be set; Receipt, review and respond of emails from receiver and Maxine Streeter, Esq. regarding same.	0.40hr \$400.00/hr	\$160.00
06/12/18	MB	Legal research on compelling defendant to turn over laptop is not testimonial for Fifth Amendment purposes	0.30hr \$210.00/hr	\$63.00
06/12/18	CBH	Meeting with M. Streeter regarding additional letters to banks regarding turnover/freeze; send letters; update chart; receipt and review of trial order; calendar.	1.30hr \$125.00/hr	\$162.50
06/13/18	JEP	Review order to show cause on corporate disclosure statement of yesterday; review Molina corporate disclosure; review and calendar scheduling order received from court. Continue working on plan for analysis of value of assets at business premises, and vacation of premises. Continue working on demanding documents, sworn response and transfer of monies from financial institutions. Phone conference with team. Phone conference with FTC, make arrangements to give access to CRM, direct follow-up with IT professional on cost. Go over possible additional asset freeze violations. Go over transfers and possible expansion of Receivership.	5.80hr \$425.00/hr	\$2,465.00
06/13/18	GMG	Review 5th Amendment case law forwarded by the receiver (2.); exchange emails with FTC (.3); conference call with FTC (1.); review scheduling order (.2); conference call with Google's counsel re stay (.3).	3.80hr \$410.00/hr	\$1,558.00
06/13/18	MKS	Conference call with FTC; Numerous telephone conference with Chase Bank regarding document production and records to be produced from correspondence; Investigate AT&T new service matter sent to Fairway Boca Raton address; Numerous calls with banks regarding records statement required under oath.	5.30hr \$355.00/hr	\$1,881.50
06/13/18	TVV	Conference with FTC and Leadership team.	1.00hr \$400.00/hr	\$400.00
06/14/18	JEP	Review motion for extension of time to answer, order denying same, review Diaz answer. Discuss progress on freezing funds. Draft case memo of progress and issues. Direct progress on Yates issues and property and interview.	2.00hr \$425.00/hr	\$850.00
06/14/18	GMG	Review documents re possible claims against BOA merchant accounts (1.5); exchange emails with A. Cove re 5th Amendment briefing (.3); call with J. Schneider re BAMS (.2)	2.00hr \$410.00/hr	\$820.00
06/14/18	MKS	Telephone conference with A. Cohen and email exchange; Draft Ex A to Yates Deposition; Telephone conference with BB&T regarding sworn statement; Telephone conference with Chase regarding sworn statement.	0.90hr \$355.00/hr	\$319.50

06/14/18	CBH	Attention to documents received from Chase and Wells Fargo; download (.6); preparation of subpoena and exhibit for V. Yates and D. Mendoza; meeting with M. Streeter regarding same; send demand letters to Onpoint Media and Technologic USA.	2.00hr \$125.00/hr	\$250.00
06/15/18	JEP	Analysis of Connective Management entity. Discuss with team and FTC for additional information. Work with accountant on filings with IRS and related issues. Work on analysis to determine whether additional entities should be added to case. Meet with GG re same. Phone call with FTC. Work on analysis of claims against third parties, discuss with GG.	3.60hr \$425.00/hr	\$1,530.00
06/15/18	GMG	Exchange emails with FTC re briefing schedule (.5); review motion for extension of time (.2); review order re same (.1); review amended motion for extension of time (.2); review Diaz answer (.4); review information re merchant accounts and bank information (1.); exchange emails with J. Schneider re merchant account claims (.3); continue reviewing merchant processing documents (2.); review corrective management documents (.3); call with FTC (.4); review order (.1).	5.50hr \$410.00/hr	\$2,255.00
06/18/18	JEP	Review order on discovery motions. Update chart of money flows through various parties. Further analysis on whether to include All Star Data LLC as receivership entity based on transfers, ownership/control by Ramsey, assumption of lease as lessee from Pocker/Modern Spotlight for 550 Fairway Drive site.	2.60hr \$425.00/hr	\$1,105.00
06/18/18	GMG	Exchange emails with FTC re 5th amendment briefing schedule (.3); exchange emails with J. Schneider re BOA merchant services (.4).	0.70hr \$410.00/hr	\$287.00
06/18/18	MKS	Review correspondence from Green Dot.	0.50hr \$355.00/hr	\$177.50
06/18/18	CBH	Attention to documents from Green Dot and return of Fed Ex from Onpoint; meeting with M. Streeter regarding same; attention to discovery order.	0.50hr \$125.00/hr	\$62.50
06/19/18	JEP	Attend to issues regarding discovery, analysis of information provided in response to turnover and information demands, docusign review and follow up per sam, including issuance of additional turnover demand.	1.60hr \$425.00/hr	\$680.00
06/19/18	GMG	Review discovery order.	0.10hr \$410.00/hr	\$41.00
06/19/18	CBH	Sent demand letter to docusign; meeting with M. Streeter regarding same.	0.40hr \$125.00/hr	\$50.00

06/20/18	JEP	Phone conference with potential counsel for claims against financial institution. Research claim, meet with G. Garno re same. Meet with M. Streeter re same. Meet to discuss success in having institutions transfer frozen funds to Receiver. Draft memos to file re same and circulate. Update website to reflect order to show cause and PI. Review and discuss initial disclosures by Modern Internet Marketing LLC, Modern Spotlight Group LLC, Modern Spotlight LLC, Michael Pocker, Ramsey, Pillonato. Review additional disclosures by financial institutions received today and direct follow up. Review and analysis of relationship between various third parties. Draft memo to team re same.	5.30hr \$425.00/hr	\$2,252.50
06/20/18	GMG	Conference call with J. Schneider re merchant services claims (1.); attention to issues re merchant processors (.5); finalize demand letter to merchant processors (.3); review 3rd party responses to turnover demands (.4)	2.20hr \$410.00/hr	\$902.00
06/20/18	MKS	Draft and finalize Merchant Demand letters; Draft and revised inventory; Review for Roth & Cohen; Review American Express production and prepared summary.	6.60hr \$355.00/hr	\$2,343.00
06/20/18	CBH	Send Advice Local documents to FTC; preparation of letters to merchant companies; meeting with M. Streeter and B. Silva regarding same.	1.00hr \$125.00/hr	\$125.00
06/21/18	GMG	Review various initial disclosures (.5); review documents and attention to issues re Amex (.5); review Allstar Data fact sheet (.2).	1.20hr \$410.00/hr	\$492.00
06/21/18	CBH	Meeting with E. Serres regarding trial deadlines; receipt of order striking initial disclosures.	0.40hr \$125.00/hr	\$50.00
06/22/18	GMG	Review order re striking of initial disclosures (.2); attention to issues re fee application (.1).	0.30hr \$410.00/hr	\$123.00
06/22/18	CBH	Attention to correspondence from Bank of America; attention to correspondence from American Express.	0.50hr \$125.00/hr	\$62.50
06/25/18	JEP	Communications regarding property at locations, inventory, requests for information from Ramsey counsel re same; communications regarding briefing schedule on 5th amendment issues. Review invoice from Kapila on tax advice and filing preparations for month of May.	1.10hr \$425.00/hr	\$467.50
06/25/18	GMG	Exchange emails with Roth re Ramsey inventory (.2); exchange emails with Cove re fifth amendment briefing (.3); begin drafting first interim fee application (2.); exchange emails with L. Johnson re fee application (.3); review BBT response to asset freeze demand (.2); review answer filed by Molina (.3).	3.30hr \$410.00/hr	\$1,353.00
06/26/18	GMG	Review various answers filed by multiple defendants (1.); continue working on fee application (1.5); review discovery requests to Pillonato and Ramsey (.4).	2.90hr \$410.00/hr	\$1,189.00

06/27/18	JEP	Communications re iPad and cell phones found at offices, direct attempts to determine if company property and/or reunite with owners. Communications with team re impact of new decision by SCT and 11th Circuit re third party claims. Review proposed orders, and Court's orders entered today on default against Aaron Michael Jones, Modern Source Media, Pointbreak Media, DCP Marketing., Review Diamond Exchange response and direct further inquiry re information.	1.50hr \$425.00/hr	\$637.50
06/27/18	MKS	Inventory of items found at Boca Raton office; Reach out to TV; Receive and review Affidavit and emails from the Diamond Exchange.	1.40hr \$355.00/hr	\$497.00
06/28/18	MKS	Handle Merchant (MC) processing with RBC; Numerous phone calls; Receipt and review emails regarding Diamond Exchange; Draft Response.	1.60hr \$355.00/hr	\$568.00
06/28/18	GMG	Review various motions and orders re defaults (.7); attention to issues re Diamond Exchange (.3).	1.00hr \$410.00/hr	\$410.00
06/28/18	MB	Call customer of Modern Source Media to discuss stopping monthly payments and to gather bank information	0.40hr \$210.00/hr	\$84.00
06/29/18	GMG	Exchange emails with FTC re fifth amendment brief (.2); review request for production to Molina (.2); review clerk's defaults (.3); exchange emails re mediation (.2).	0.90hr \$410.00/hr	\$369.00
		Total Legal Fees . . .	844.20	\$284,355.00

**FEE SUMMARY:**

<b>Professional</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Jonathan E Perlman	208.50	\$425.00	\$88,612.50
Greg M Garno	112.50	\$410.00	\$46,125.00
Heather L Harmon	10.00	\$360.00	\$3,600.00
Theresa V Vliet	95.60	\$400.00	\$38,240.00
Jesus M Suarez	30.40	\$280.00	\$8,512.00
Maxine K Streeter	149.50	\$355.00	\$53,072.50
Benjamin P Bean	33.00	\$230.00	\$7,590.00
JP Bado	76.10	\$210.00	\$15,981.00
Michael Bild	82.20	\$210.00	\$17,262.00
Colleen B Hopkins	35.40	\$125.00	\$4,425.00
Carolyn Esser	11.00	\$85.00	\$935.00
<b>Total Legal Fees . . .</b>	<b>844.20</b>		<b>\$284,355.00</b>

**-- Costs --**

	Copies	717.62
	Postage	401.89
05/09/2018	Fedex Airbill No.772194070230 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772194111439 (10675-007) FedEx 6-189-63081	15.37
05/09/2018	Fedex Airbill No.772194138262 (10675-007) FedEx 6-189-63081	24.64
05/09/2018	Fedex Airbill No.772194233631 (10675-007) FedEx 6-189-63081	25.00
05/09/2018	Fedex Airbill No.772194262101 (10675-007) FedEx 6-189-63081	25.00
05/09/2018	Fedex Airbill No.772194289553 (10675-007) FedEx 6-189-63081	28.50
05/09/2018	Fedex Airbill No.772194326140 (10675-007) FedEx 6-189-63081	23.35
05/09/2018	Fedex Airbill No.772194347229 (10675-007) FedEx 6-189-63081	28.50
05/09/2018	Fedex Airbill No.772194590669 (10675-007) FedEx 6-189-63081	15.37
05/09/2018	Fedex Airbill No.772194864523 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772194887590 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772194907552 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772194925850 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772194945336 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772194962832 (10675-007) FedEx 6-189-63081	24.51
05/09/2018	Fedex Airbill No.772194989254 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772195798709 (10675-007) FedEx 6-189-63081	19.81
05/09/2018	Fedex Airbill No.772196482590 (10675-007) FedEx 6-189-63081	25.00
05/09/2018	Miscellaneous/Broward Century Locksmith 550 Parkway drive #104 change I	188.42
05/09/2018	Miscellaneous/Broward Century Locksmith 4730 NW 2nd ave #200 change	241.36
05/10/2018	Fedex Airbill No.772204289135 (10675-007) FedEx 6-189-63081	19.81

05/10/2018	Fedex Airbill No.772204319083 (10675-007) FedEx 6-189-63081	29.44
05/10/2018	Fedex Airbill No.772204389540 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772204409269 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772204436983 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772204463060 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772204518531 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772204552375 (10675-007) FedEx 6-189-63081	25.00
05/10/2018	Fedex Airbill No.772204630487 (10675-007) FedEx 6-189-63081	25.00
05/10/2018	Fedex Airbill No.772204650136 (10675-007) FedEx 6-189-63081	28.50
05/10/2018	Fedex Airbill No.772204683540 (10675-007) FedEx 6-189-63081	28.50
05/10/2018	Fedex Airbill No.772204707930 (10675-007) FedEx 6-189-63081	23.35
05/10/2018	Fedex Airbill No.772205076467 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206053381 (10675-007) FedEx 6-189-63081	25.00
05/10/2018	Fedex Airbill No.772206068970 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206087493 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206104000 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206125970 (10675-007) FedEx 6-189-63081	24.51
05/10/2018	Fedex Airbill No.772206242048 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206263300 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206278781 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772206310593 (10675-007) FedEx 6-189-63081	28.50
05/10/2018	Fedex Airbill No.772206327176 (10675-007) FedEx 6-189-63081	28.50
05/10/2018	Fedex Airbill No.772206351273 (10675-007) FedEx 6-189-63081	24.64
05/10/2018	Fedex Airbill No.772206616340 (10675-007) FedEx 6-189-63081	32.95
05/10/2018	Fedex Airbill No.772206821723 (10675-007) FedEx 6-189-63081	19.81
05/10/2018	Fedex Airbill No.772203302346 (10675-007) FedEx 6-189-63081	11.41
05/10/2018	Fedex Airbill No.772204600885 (10675-007) FedEx 6-226-13781	24.64
05/11/2018	Fedex Airbill No.772214153198 (10675-007) FedEx 6-189-63081	28.50
05/11/2018	Fedex Airbill No.772214197874 (10675-007) FedEx 6-189-63081	28.50
05/11/2018	Fedex Airbill No.772214288574 (10675-007) FedEx 6-189-63081	25.00
05/11/2018	Fedex Airbill No.772215751588 (10675-007) FedEx 6-189-63081	18.30
05/11/2018	Fedex Airbill No.772216739561 (10675-007) FedEx 6-189-63081	24.64
05/11/2018	Fedex Airbill No.772216950230 (10675-007) FedEx 6-189-63081	11.41
05/11/2018	Fedex Airbill No.772217722091 (10675-007) FedEx 6-189-63081	11.41
05/15/2018	Fedex Airbill No.772241225172 (10675-007) FedEx 6-189-63081	24.64
05/15/2018	Fedex Airbill No.772241264000 (10675-007) FedEx 6-189-63081	28.50
05/15/2018	Fedex Airbill No.772241296050 (10675-007) FedEx 6-189-63081	18.30
05/15/2018	Fedex Airbill No.772241321824 (10675-007) FedEx 6-189-63081	24.64

05/16/2018	Filing Fees CA (10675-007) Clerk, US District Court	47.00
05/16/2018	Filing Fees RI (10675-007) Clerk, US District Court	47.00
05/16/2018	Fedex Airbill No.772246488163 (10675-007) FedEx 6-189-63081	28.50
05/16/2018	Fedex Airbill No.772246534589 (10675-007) FedEx 6-189-63081	25.00
05/16/2018	Fedex Airbill No.772251405578 (10675-007) FedEx 6-190-16446	42.49
05/17/2018	Courier Service (10675-007) Arrow Express Messenger Service 57164	65.00
05/17/2018	Fedex Airbill No.427954784769 (10675-007) FedEx 6-226-13781	12.79
05/18/2018	Filing Fees (10675-007) American Express XXXX-XXXXX6-49005	20.00
05/21/2018	Fedex Airbill No.772280432122 (10675-007) FedEx 6-226-13781	40.05
05/21/2018	Fedex Airbill No.772280465845 (10675-007) FedEx 6-226-13781	15.40
05/21/2018	Fedex Airbill No.772281107520 (10675-007) FedEx 6-226-13781	25.05
05/21/2018	Fedex Airbill No.772282098183 (10675-007) FedEx 6-226-13781	25.05
05/22/2018	Fedex Airbill No.772293724980 (10675-007) FedEx 6-226-13781	24.00
05/23/2018	Fedex Airbill No.772305229242 (10675-007) FedEx 6-226-13781	15.40
05/23/2018	Fedex Airbill No.772305252413 (10675-007) FedEx 6-226-13781	15.40
05/24/2018	Fedex Airbill No.427954787253 (10675-007) FedEx 6-226-13781	12.82
05/29/2018	Fedex Airbill No.772341732115 (10675-007) FedEx 6-226-13781	26.46
05/29/2018	Fedex Airbill No.77239198580 (10675-007) FedEx 6-226-13781	14.72
05/31/2018	Miscellaneous/E-hounds platform E-Hounds, Inc. 62312	1,190.00
06/01/2018	Fedex Airbill No.772374173886 (10675-007) FedEx 6-226-13781	27.44
06/01/2018	Fedex Airbill No.772375888586 (10675-007) FedEx 6-226-13781	24.81
06/04/2018	Fedex Airbill No.772389463121 (10675-007) FedEx 6-226-13781	24.81
06/04/2018	Fedex Airbill No.772389549234 (10675-007) FedEx 6-226-13781	24.81
06/06/2018	Parking (10675-007) Jonathan E. Perlman	8.00
06/07/2018	Fedex Airbill No.861744052466 (10675-007) FedEx 6-226-13781	53.97
06/07/2018	Fedex Airbill No.861744052477 (10675-007) FedEx 6-226-13781	19.21
06/11/2018	Miscellaneous/Google - Gmail active account (10675-007) American Express	194.82
06/12/2018	Fedex Airbill No.772459453900 (10675-007) FedEx 6-226-13781	24.70
06/12/2018	Fedex Airbill No.772459486442 (10675-007) FedEx 6-226-13781	24.70
06/12/2018	Fedex Airbill No.772459514696 (10675-007) FedEx 6-226-13781	28.57
06/14/2018	Fedex Airbill No.772478266267 (10675-007) FedEx 6-226-13781	19.85
06/15/2018	Fedex Airbill No.772494135478 (10675-007) FedEx 6-226-13781	11.43
06/19/2018	Fedex Airbill No.772515583391 (10675-007) FedEx 6-226-13781	28.50
06/20/2018	Fedex Airbill No.772527243831 (10675-007) FedEx 6-226-13781	24.64
06/20/2018	Fedex Airbill No.772527297095 (10675-007) FedEx 6-226-13781	24.64
06/20/2018	Fedex Airbill No.772527345701 (10675-007) FedEx 6-226-13781	27.25
06/20/2018	Fedex Airbill No.772527384411 (10675-007) FedEx 6-226-13781	25.00

06/20/2018	Fedex Airbill No.772527476596 (10675-007) FedEx 6-226-13781	24.64
06/20/2018	Fedex Airbill No.772527511065 (10675-007) FedEx 6-226-13781	28.50
	Total Costs	\$5,186.55
	Total Invoice	\$289,541.55

# Kapila/Mukamal

CPAs, Forensic and Insolvency Advisors  
 1000 S. Federal Highway, Suite 200  
 Fort Lauderdale, FL 33316

Phone - 954-761-1011 F - 954-761-1033 www.kapilamukamal.com  
 EIN #46-5394135

FTC V. POINTBREAK MEDIA, LLC, ET AL  
 C/O JONATHAN PERLMAN, RECEIVER  
 VIA EMAIL TO: JPERLMAN@GJB-LAW.COM;  
 ESERRES@JGB-LAW.COM

Invoice: 4504  
 05/31/2018  
 Client ID: 90131

For Professional Services Rendered Through May 31, 2018

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
05/15/2018	SRK	POINTBREAK/PILLO NATO - REVIEW ORDER GRANTING TRO AND AGARWAL DECLARATION.	0.80	456.00
05/15/2018	MMD	POINTBREAK - REVIEW RECEIVER ORDER AND T/C WITH J. PERLMAN RE SAME.	0.80	348.80
TAX SERVICES - PREPARE FORMS				
05/15/2018	KAF	RE: FTC V POINTBREAK MEDIA LLC (PERLMAN, RECEIVER) - SAVE DOCUMENTS PROVIDED BY E. SERRES AND BEGIN REVIEW, EMAILS WITH L. JOHNSON AND M. DAVIS RE: BANK ACCOUNT EIN FOR RECEIVER	0.40	124.00
05/23/2018	LJJ	T/C/W E. SERRES REGARDING VARIOUS QUESTIONS AND BEGIN GATHERING INFORMATION TO PREPARE FORMS 56	1.20	516.00
05/25/2018	LJJ	PREPARE ENGAGEMENT LETTER	0.60	258.00
05/25/2018	LJJ	READ PLEADINGS SUPPORTING RECEIVER APPOINTMENT, GATHER INFORMATION AND FL SECY OF STATE DOCUMENTATION WITH SUPPORTING INFORMATION CONCERNING RECEIVERSHIP ENTITIES. PREPARE RETENTION INFORMATION AND REVIEW NEED FOR FORMS 56, TRANSCRIPT REQUESTS AND POA FORMS WITH K JOHNSON	1.20	516.00
05/29/2018	LJJ	DRAFT TRANSMITTAL LETTERS TO ACCOMPANY TRANSCRIPT REQUESTS AND REVIEW PACKAGES FOR EACH RECEIVERSHIP ENTITY	2.60	1,118.00
05/29/2018	KJJ	PREPARED FORMS 56 & 2848 FOR ASSEMBLY (7 ENTITIES)	2.30	345.00
05/30/2018	KJJ	PREPARED FORMS 56, 4506-T, & 2848 FOR ASSEMBLY (7 ENTITIES)	3.00	450.00
05/31/2018	LJJ	EMAILS AND FOLLOW-UP FOR EINS AND ADDITIONAL RECEIVERSHIP ENTITIES.	0.60	258.00
05/31/2018	KJJ	ASSEMBLED FORMS 56, 4506-T, & 2848 (7 ENTITIES)	2.50	375.00



KapilaMukamal, LLP

Invoice #4504

6/20/2018

Page 2 of 2

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			16.00	4,764.80
EXPENSES				
05/31/2018	EXP	PRINTED COPIES - MAY (05/01/18 - 05/31/18)		176.85
05/31/2018	EXP	PACER - MAY 2018		0.50
			1,184.00	177.35
			Agreed 15% Public Service Discount	(714.72)
Total amount of this invoice				\$4,227.43

Invoice payable upon receipt. Thank you for this opportunity to be of service.

# Kapila/Mukamal

CPAs, Forensic and Insolvency Advisors  
 1000 S. Federal Highway, Suite 200  
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Phone - 954-761-1011 F - 954-761-1033 www.kapilamukamal.com  
 EIN #46-5394135

FTC V. POINTBREAK MEDIA, LLC, ET AL  
 C/O JONATHAN PERLMAN, RECEIVER  
 VIA EMAIL TO: JPERLMAN@GJB-LAW.COM;  
 ESERRES@JGB-LAW.COM

Invoice: 4629

06/30/2018

Client ID: 90131

For Professional Services Rendered Through June 30, 2018

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
TAX SERVICES - PREPARE FORMS				
06/01/2018	LJJ	ADDRESS ADDITIONS TO RECEIVERSHIP, WORK WITH STAFF TO FINALIZE FORMS 56, TRANSCRIPT REQUESTS AND POWER OF ATTORNEY FOR TEN RECEIVERSHIP ENTITIES.	2.30	989.00
06/01/2018	KJJ	PREPARED, ASSEMBLED, AND FEDEXED FORMS 56, 4506-T, & 2848 (10 ENTITIES)	4.00	600.00
06/18/2018	LJJ	T/C/W E. SERRES, REVIEW MAILING, REVIEW AND TRANSMIT SUNBIZ DOCUMENTS FOR MAILINGS, REVISE LETTER, SCAN AND TRANSMIT FOR FORMS 56.	1.30	559.00
06/26/2018	LJJ	T/C/W E SERRES REGARDING TAX NOTICES	0.20	86.00
				2,234.00
				2,234.00
EXPENSES				
06/01/2018	EXP	FEDEX		72.45
06/01/2018	EXP	FEDEX		72.45
06/30/2018	EXP	PRINTED COPIES - JUNE (06/01/18 - 06/30/18)		92.70
				237.60
				237.60
Agreed 15% Public Service Discount				(335.10)
Total amount of this invoice				\$2,136.50

Invoice payable upon receipt. Thank you for this opportunity to be of service.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 18-61017-CIV-ALTONAGA/SELTZER**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**POINTBREAK MEDIA, LLC, et al.,**

Defendants.

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**ORDER GRANTING RECEIVER'S FIRST MOTION FOR AWARD OF  
PROFESSIONAL FEES AND REIMBURSEMENT OF EXPENSES**

**THIS CAUSE** came before the Court on Jonathan E Perlman, Esq., as Receiver (the "Receiver") for the Receivership Defendants, *First Motion for Award of Professional Fees and Reimbursement of Expenses* (the "Application") [ECF No. \_\_ ], filed on July 31, 2018. The Court has considered the Application, and being otherwise fully advised in the premises, it is

**ORDERED AND ADJUDGED** as follows:

1. The Receiver's First Fee Application is **APPROVED**.
2. The Receiver and Genovese Joblove & Battista, P.A.'s ("GJB") fees of \$284,355.00 and expenses of \$5,186.55 are **APPROVED**. The Receiver is authorized to pay GJB \$133,146.30, representing 45% of the approved fees (\$284,355.00) and 100% of expenses (\$5,186.55) earned through June 30, 2018. The remaining fees due to the Receiver and GJB of \$156,395.25, although approved, shall not be paid at this time.

3. KapilaMukamal, LLP's ("KM") fees of \$5,948.98 and expenses of \$414.95 are **APPROVED**. The Receiver is authorized to pay KM \$3,091.99, representing 45% of fees (\$5,948.98) and 100% of expenses (\$414.95) earned through June 30, 2018. The remaining fees due to KM of \$3,271.94, although approved, shall not be paid at this time.

4. The Receiver may at his discretion seek authorization from this Court to pay the above holdbacks at such time(s) as he deems appropriate.

**DONE and ORDERED** in Chambers at Miami-Dade County, Florida this \_\_\_\_ day \_\_\_\_\_, 2018.

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**CECILIA M. ALTONAGA**  
**UNITED STATES DISTRICT JUDGE**

cc: counsel or record