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11 Attorneys for Receiver
12 Thomas A. Seaman

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 v.

19 STEVE CHEN, USFIA, INC.,
20 ALLIANCE FINANCIAL
GROUP, INC., AMAUCTION, INC.,
21 ABORELL MGMT I, LLC, ABORELL
22 ADVISORS I, LLC, ABORELL
REIT II, LLC, AHOME REAL
23 ESTATE, LLC, ALLIANCE
24 NGN, INC., APOLLO REIT I, INC.,
APOLLO REIT II, LLC, AMKEY, INC.,
25 US CHINA CONSULTATION
ASSOCIATION, and QUAIL RANCH
26 GOLF COURSE, LLC,

27 Defendants.
28

Case No. 2:15-cv-07425 RGK PLA

**TWENTY-FOURTH INTERIM
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS, LLP,
GENERAL COUNSEL TO THE
RECEIVER FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES**

Date: September 26, 2022
Time: 9:00 a.m.
Ctrm.: 850
Judge: Hon. R. Gary Klausner

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general
2 counsel to Thomas A. Seaman ("Receiver"), the Court-appointed permanent receiver
3 for Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc.,
4 Aborell Mgmt. I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real
5 Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC,
6 Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC,
7 and their subsidiaries and affiliates (collectively, "Receivership Entities"), hereby
8 submits this Twenty-Fourth interim application for approval and payment of fees and
9 reimbursement of expenses ("Application"). This Application covers the period from
10 January 1, 2022, through June 30, 2022 ("Twenty-Fourth Application Period"), and
11 seeks interim approval of \$89,962.20 in fees and \$609.68 in expenses, and an order
12 authorizing the Receiver to pay, on an interim basis, 80% of fees incurred \$71,969.76
13 and 100% of the costs (\$609.68).

14 I. INTRODUCTION

15 This receivership involves a complex and wide ranging group of enterprises
16 and assets funded with the fruits of the fundraising scheme at the heart of the action
17 filed by the Securities and Exchange Commission ("Commission"). The Receiver
18 was appointed on a temporary basis on September 29, 2015, and on a permanent
19 basis on October 6, 2015.

20 The appointment orders confer broad duties, responsibilities, and powers on
21 the Receiver that are designed to allow him to secure, preserve, and protect the assets
22 of the Receivership Entities, investigate and recover sums transferred to third parties,
23 conduct a forensic accounting and analysis of the Receivership Entities' financial
24 transactions, review and analyze investor claims, and maximize the amount
25 ultimately available for distribution to investors. The appointment orders authorized
26 the Receiver to engage counsel to assist him in the performance of his duties. The
27 Receiver determined that experienced, qualified counsel was critical due to the size
28

1 and complexity of the receivership estate. Accordingly, the Receiver engaged Allen
2 Matkins to assist with ongoing legal issues facing the receivership estate.

3 This fee application should be read in conjunction with the Receiver's Twenty-
4 Fifth Interim Report, which describe in detail the Receiver's and Allen Matkins'
5 activities during the Twenty-Fourth Application Period. This Application seeks
6 interim approval of \$89,962.20 in fees for a total of 111 hours worked, and payment
7 on an interim basis of 80% of that amount, or \$71,969.76. The work performed is
8 described task-by-task in Exhibit A and is broken down into the following
9 categories:

Matter	Hours	Amount
Asset Investigation/Recovery	1.4	\$1,036.35
Reporting	5.1	\$4,113.90
Pending Litigation	4.5	\$2,809.35
Claims	53.9	\$43,873.65
Distribution	46.1	\$38,128.95
TOTAL	111.00	\$89,962.20

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16 Allen Matkins has worked diligently and efficiently to assist the Receiver with
17 the remaining legal issues and tasks facing the receivership estate. The firm's work
18 has allowed the Receiver to recover, preserve and protect the substantial value of
19 receivership estate assets and to monetize the recovered non-cash assets, which has
20 resulted in the Receiver recovering gross receipts of \$79,256,373.09. Importantly,
21 during this period, Allen Matkins was successful in negotiating a stipulated
22 resolution of the IRS present and future claims against the Receivership Entities,
23 which will allow for the distributions to finally be made to the investors. The checks
24 to investors started being distributed in early July, 2022.

25 Accordingly, Allen Matkins requests to be compensated on an interim basis
26 for its work.

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1 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

2 **A. Categories and Descriptions of Work**

3 **1. Asset Investigation**

4 Allen Matkins' work during this period consisted of providing legal support to
5 the Receiver in connection with his efforts to recover cash held in a safe deposit box.
6 In addition, Allen Matkins conferred with the Receiver as to the work required to
7 recover funds held by the State of California Treasurer. The reasonable and
8 necessary fees for work in this category total \$1,036.35.

9 **2. Reporting**

10 Allen Matkins' work in this category consisted of providing legal support and
11 assistance to the Receiver with regard to the Receiver's interim reports and
12 recommendations. This work included drafting and editing portions of the report and
13 communications with the SEC. In addition, Allen Matkins worked to draft a letter to
14 Congresswoman Chu to seek assistance with the IRS. The reasonable and necessary
15 fees for work in this category total \$4,113.90.

16 **3. Pending Litigation**

17 Allen Matkins' work in this category relates to the pending state court
18 litigation matters brought by investors against the Receivership Entities. While these
19 State Court cases are stayed, the Superior Court judge has continued to require
20 periodic status reports from the Plaintiffs and the Receiver. Once the below
21 described distribution process has been concluded, these actions will become moot
22 and the Receiver anticipates the cases will be dismissed. The reasonable and
23 necessary fees for work in this category total \$2,809.35.

24 **4. Claims**

25 The primary claims issues during the Twenty Fourth Application Period, were
26 the inability to gain the cooperation of the IRS to review tax returns and to ascertain
27 whether the receivership estate would be liable for taxes based on the existing and
28 prospective claims of the IRS and the FTB.

1 The Court approved the Receiver's recommendation to allow claims totaling
2 approximately \$80 million. With this large number of claimants and the existence of
3 an equally large sum of money to pay these claims, the delays in the distribution
4 process have resulted in a significant number of ongoing inquiries from investors
5 seeking information regarding the status of the case and the timing of distributions.
6 Allen Matkins refers the vast majority of such inquiries to the Receiver's office,
7 however, some claimant inquiries were handled by Allen Matkins during this period.

8 The vast majority of Allen Matkins work during this period has been directed
9 toward resolving the numerous complex tax issues and claims by the Internal
10 Revenue Service ("IRS") and California Franchise Tax Board ("FTB"), arising out of
11 pre-receivership and post-receivership tax returns. The resolution of the IRS's and
12 FTB's tax claims has been the condition precedent that has held up Receiver's
13 distribution to investors and creditors. As discussed herein and the Receiver's
14 Report, the issues regarding the IRS and FTB have finally been resolved and the
15 Receiver is finally able to make distributions (although, the tax returns have still not
16 been processed.)

17 Leading up to the resolution of our dispute with the IRS, Allen Matkins
18 provided legal guidance and assistance to the Receiver in an effort to expedite the
19 IRS' review of tax returns. We continued our research and analysis of a variety of
20 tax issues and work on a variety of approached to gain the cooperation of the IRS.

21 Allen Matkins' tax counsel has worked directly with personnel at the IRS to try
22 to expedite the review of tax returns through the established procedures (i.e. prompt
23 determination and prompt assessment). She also made considerable efforts to
24 contact different folks at the IRS both locally as well as in Washington, to try to gain
25 their cooperation and to encourage the IRS to conform with Directive 137, whereby
26 the IRS would subordinate its present or future claims to the claims of investor
27 claimants.

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1 In addition, Allen Matkins pursued the IRS through interaction with
2 Congresswoman Judy Chu. We wrote a comprehensive letter and then pursued the
3 matter with Congresswoman Chu's staff. This led to direct contact with the IRS.

4 While some progress was being made, we could not get any firm commitment
5 from the IRS as to how we could resolved these issues. Ultimately, we decided to
6 file a Motion to Modify the Distribution Plan and served the IRS. As discussed
7 below, this finally resulted in negotiations as to resolve the primary issue with the
8 IRS. The reasonable and necessary fees for work in this category total \$43,873.65.

9 **5. Distribution**

10 Allen Matkins' work in this category involved addressing the unique tax issues
11 and developing an amended plan of distribution which would allow for the maximum
12 distribution to investors while addressing any possible present or future claims of the
13 IRS or FTB. There was significant overlap with the work described above as to
14 Claims. In some cases, the work crossed over and so billing entries in each category
15 were split (i.e. certain time entries were split between the "Claims" and
16 "Distribution" matters.) The motion to amend the Distribution Plan was successful
17 in that it prompted the IRS to appear and negotiate a stipulation in which the
18 Receiver and Receivership Entities are protected from the IRS present and future
19 claims. Once the stipulation with the IRS was completed and Distribution Plan was
20 amended, Allen Matkins worked with the Receiver and claimants to address issues
21 related to distributions. The reasonable and necessary fees for work in this category
22 total \$38,128.95.

23 **B. Summary of Expenses Requested for Reimbursement**

24 Allen Matkins requests the Court approve reimbursement of \$609.68 in out-of-
25 pocket costs. These costs reflect Court Filing Fees, Messenger/FedEx Fees, Postage,
26 and Duplication for the 6 month period.

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1 and employ attorneys and others to investigate and, where appropriate, institute,
2 pursue, and prosecute all claims and causes of action of whatever kind and nature.
3 *See* TRO, Part XI; PI Order, Part XI.

4 As previously reported, the Receiver determined that experienced, qualified
5 counsel was necessary due to the size and complexity of the receivership estate and
6 engaged Allen Matkins pursuant to the authority granted to him. Allen Matkins has
7 submitted a detailed fee application which describes the nature of the services
8 rendered, and the identity and billing rate of each individual performing each task.
9 *See* Exhibit A.

10 Allen Matkins has endeavored to staff matters as efficiently as possible while
11 remaining cognizant of the complexity of issues presented. The request for fees is
12 based on Allen Matkins' customary billing rates charged for comparable services
13 provided in other matters, less a 10% discount.

14 The work performed by Allen Matkins over the 6 month Application Period
15 was essential to carrying out the Receiver's Court-ordered duties. Allen Matkins has
16 worked diligently to preserve and protect the assets of the receivership estate,
17 investigate and recover sums transferred to third parties, and maximize the funds
18 available for ultimate distribution to investors. Moreover, Allen Matkins seeks
19 payment of only 80% of fees incurred on an interim basis in recognition of the fact
20 that its work in assisting the Receiver is ongoing. Payment of the proposed 20%
21 holdback will be sought at the conclusion of the receivership. Allen Matkins' fees
22 are fair and reasonable and should be approved and paid on an interim basis.

23 IV. CONCLUSION

24 Allen Matkins, therefore, respectfully requests the Court enter an Order:

- 25 1. Approving Allen Matkins' fees, on an interim basis, of \$89,962.20;
- 26 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
27 \$71,969.76, from the assets of the Receivership Entities;

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1 3. Approving Allen Matkins' costs in the amount of \$609.68, and
2 authorizing and directing the Receiver to reimburse such costs in full; and

3 4. For such other and further relief as the Court deems appropriate.
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5 Dated: August 26, 2022

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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7 By: /s/ David R. Zaro

8 DAVID R. ZARO
9 Attorneys for Receiver
10 THOMAS A. SEAMAN
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EXHIBIT A

07/07/22 16:03:24 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 04/19/22
 Proforma Number: 1170515

Matter #: 375323.00002

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: General Receivership

Client/Matter Joint Group # 375323-1

Client Matter Number:

Disbursements for Matter 375323.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
01/06/22	2761142	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	2.10	WO	HD	TR	_____
03/02/22	2756674	MSNGR – Federal Express - Ship To: Ms Judy Chu, U S Congresswo - 27th District, California	0.00	28.07	WO	HD	TR	_____
04/04/22	2759590	BW – Duplication - Black & White Copies	159.00	23.85	WO	HD	TR	_____
04/05/22	2759690	BW – Duplication - Black & White Copies	115.00	17.25	WO	HD	TR	_____
04/06/22	2759761	BW – Duplication - Black & White Copies	1.00	0.15	WO	HD	TR	_____
04/22/22	2761958	BW – Duplication - Black & White Copies	455.00	68.25	WO	HD	TR	_____
04/22/22	2767384	MSNGR – Messenger - Nationwide Legal LLC - USDC/ROYBAL FEDERAL/CENTRAL DISTRICT OF CA	0.00	75.65	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
		0.00		\$0.00
	Subtotal Fees			\$0.00
	Discount			0.00
	Total Fees			0.00
	Total Disbursements			215.32

Attorney Billing Instructions

07/07/22 16:03:24 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,588.40	0.00	1,588.40	215.32	0.00	215.32	190,772.69	156,627.00	34,145.69
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,318.62	383.22	935.40
Billed	0.00	0.00	0.00	3,078.35	2,762.10	316.25	155,540.07	155,540.07	33,930.37
Collected	0.00	0.00	0.00	3,078.35	2,762.10	316.25	189,470.44	155,540.07	33,930.37
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	215.32	0.00	215.32						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

07/07/22 16:03:25 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 01/27/22
 Proforma Number: 1170515

Matter #: 375323.00003

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Asset Investigation & Recovery

Client/Matter Joint Group # 375323-1

Client Matter Number:

Fees for Matter 375323.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
06/15/22	8864914	Call with Receiver related to background and recovery of state of California assets, recovery process, timing and follow-up regarding receipt of funds.	Zaro, David	0.40	334.80	334.80	WO	HD	TR
06/20/22	8867793	Analyze issues and advise Receiver re: recovery of funds held in frozen safe deposit box	Fates, Edward (Ted)	0.70	450.45	785.25	WO	HD	TR
06/20/22	8871553	Follow-up on Receiver request for safe deposit funds with counsel and work on strategy.	Zaro, David	0.30	251.10	1,036.35	WO	HD	TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.70	837.00	585.90
001665	Fates, Edward (Ted)	0.70	643.50	450.45
		<u>1.40</u>		<u>\$1,036.35</u>
Subtotal Fees				\$1,036.35
Discount				0.00
Total Fees				1,036.35
Total Disbursements				0.00

07/07/22 16:03:25 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15
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Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,036.35	1,036.35	0.00	418,399.02	417,694.86	704.16
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	5,952.42	5,952.42	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	410,945.67	410,945.67	704.16
Collected	0.00	0.00	0.00	0.00	0.00	0.00	411,649.83	410,945.67	704.16
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	1,036.35	1,036.35	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

07/07/22 16:03:26 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 04/19/22
 Proforma Number: 1170515

Matter #: 375323.00004

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Reporting

Client/Matter Joint Group # 375323-1

Client Matter Number:

Fees for Matter 375323.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/11/22	8692525	Call with Receiver related to report/AUSA-SEC cooperation (.4).	Zaro, David	0.40	334.80	334.80	WO	HD	TR	_____
02/09/22	8724267	Follow-up on emails from Receiver, counsel and investors, reporting and communications as to the receivership status.	Zaro, David	0.30	251.10	585.90	WO	HD	TR	_____
02/25/22	8744243	Emails with Receiver and counsel related to draft report and accounting, review Receiver's draft report.	Zaro, David	0.30	251.10	837.00	WO	HD	TR	_____
03/01/22	8743171	Revisions to Receiver's 24th interim report	Fates, Edward (Ted)	0.60	386.10	1,223.10	WO	HD	TR	_____
03/01/22	8748068	Work on revisions to the Receiver report and Receiver fee application, several emails with Receiver and counsel regarding accounting and report, further revisions to same.	Zaro, David	0.80	669.60	1,892.70	WO	HD	TR	_____
03/02/22	8749023	Work on final revisions to the Receiver's 24th Receiver Report, address accounting and tax narrative (.6). Emails/work on letter to Congresswoman Chu related to	Zaro, David	1.20	1,004.40	2,897.10	WO	HD	TR	_____

07/07/22 16:03:26 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Fees for Matter 375323.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		assistance with IRS (.6).						
03/03/22	8750873	Further revisions to/finalize Receiver's report and recommendations (.4). Call/email with counsel related to final of report and accounting (.4).	Zaro, David	0.80	669.60	3,566.70	WO	HD TR
03/04/22	8749174	Meet and confer with SEC counsel re: 24th interim report	Fates, Edward (Ted)	0.20	128.70	3,695.40	WO	HD TR
03/09/22	8754529	Follow-up with counsel as to SEC meet/confer related to Receiver Report, applications.	Zaro, David	0.30	251.10	3,946.50	WO	HD TR
03/11/22	8757943	Email and call with Receiver related to report/SEC meet and confer.	Zaro, David	0.20	167.40	4,113.90	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	4.30	837.00	3,599.10
001665	Fates, Edward (Ted)	0.80	643.50	514.80
		<u>5.10</u>		<u>\$4,113.90</u>
Subtotal Fees				\$4,113.90
Discount				0.00
Total Fees				4,113.90
Total Disbursements				0.00

Attorney Billing Instructions

- | | |
|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL | <input type="checkbox"/> Hold |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> Transfer All |

07/07/22 16:03:26 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	5,787.90	5,787.90	0.00	87,265.35	87,265.35	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,342.48	3,342.48	0.00
Billed	0.00	0.00	0.00	5,401.35	5,401.35	0.00	77,290.47	77,290.47	0.00
Collected	0.00	0.00	0.00	5,401.35	5,401.35	0.00	77,290.47	77,290.47	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	5,787.90	5,787.90	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

07/07/22 16:03:27 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 04/19/22
 Proforma Number: 1170515

Matter #: 375323.00007

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Pending Litigation

Client/Matter Joint Group # 375323-1

Client Matter Number:

Fees for Matter 375323.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/01/22	8715676	Call from attorney representing investors in pending state court action re: status of receivership and stay of litigation against entities	Fates, Edward (Ted)	0.30	193.05	193.05	WO	HD	TR	_____
02/07/22	8720012	Advise on issues re: status conference in Geng v. Chen matter in state court	Fates, Edward (Ted)	0.30	193.05	386.10	WO	HD	TR	_____
02/07/22	8743753	Review Geng v. Chen disputed matter docket (0.1); Confer with counsel re: upcoming status conference and prepare for same (0.2); Prepare updated status conference brief and file same.	Hsu, Tim	0.70	403.20	789.30	WO	HD	TR	_____
02/08/22	8722628	Prepare for and attend status conference for Geng v. Chen matters; Provide update to counsel; Prepare/file notice of ruling.	Hsu, Tim	0.90	518.40	1,307.70	WO	HD	TR	_____
06/02/22	8851489	Advise on issues relating to status report and status conference in Geng v. Chen state court action	Fates, Edward (Ted)	0.30	193.05	1,500.75	WO	HD	TR	_____
06/02/22	8854396	Work with counsel to address the report to the superior court, hearing, review of status conference statement.	Zaro, David	0.60	502.20	2,002.95	WO	HD	TR	_____

07/07/22 16:03:27 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

Fees for Matter 375323.00007.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/02/22	8884703	Review and assess status of Geng v. Chen matter, and confer with T.Fates re: same (0.2); Prepare and submit further status report (0.4).	Hsu, Tim	0.60	345.60	2,348.55	WO	HD	TR	_____
06/03/22	8884756	Prepare for and attend status conference for Geng v. Chen matter; Provide update to counsel re: same.	Hsu, Tim	0.80	460.80	2,809.35	WO	HD	TR	_____

Disbursements for Matter 375323.00007 (Pending Litigation)

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
02/07/22	2751421	BW – Duplication - Black & White Copies	135.00	20.25	WO	HD	TR	_____
02/07/22	2753283	FILING – Nationwide Legal, LLC - LOS ANGELES COUNTY SUPERIOR COURT, STATUS REPORT REGARDING PENDING RECEIVERSHIP	0.00	39.20	WO	HD	TR	_____
02/07/22	2753284	MSNGR – Nationwide Legal, LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA, Deliver Courtesy	0.00	46.50	WO	HD	TR	_____
02/07/22	2754850	POST – Postage - RICOH -5 Large Envelopes	0.00	9.80	WO	HD	TR	_____
02/08/22	2751529	BW – Duplication - Black & White Copies	25.00	3.75	WO	HD	TR	_____
02/08/22	2753277	FILING – Nationwide Legal, LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA, NOTICE OF RULING RE FEBRUARY 8, 2022 STATUS CONFERENCE	0.00	39.20	WO	HD	TR	_____
06/02/22	2768552	BW – Duplication - Black & White Copies	105.00	15.75	WO	HD	TR	_____
06/02/22	2770827	FILING – Nationwide Legal, LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA, STATUS REPORT REGARDING PENDING RECEIVERSHIP	0.00	64.20	WO	HD	TR	_____
06/02/22	2770828	MSNGR – Nationwide Legal, LLC - LOS ANGELES	0.00	87.55	WO	HD	TR	_____

07/07/22 16:03:27 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

Disbursements for Matter 375323.00007 (Pending Litigation)

Trans Date	Index	Type	Quantity	Amt		
06/02/22	2771024	SUPERIOR COURT OF CALIFORNIA, Deliver Courtesy MSNGR – Federal Express - Ship To: Lynn Chao - Law Offices of Lynn Chao	0.00	16.22	WO	HD TR
06/02/22	2771025	MSNGR – Federal Express - Ship To: Long Liu - Liu Law Firm	0.00	35.72	WO	HD TR
06/02/22	2771208	MSNGR – Federal Express - Ship To: Alan R. Polsky - THE POLSKY LAW FIRM	0.00	16.22	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	837.00	502.20
001665	Fates, Edward (Ted)	0.90	643.50	579.15
002055	Hsu, Tim	3.00	576.00	1,728.00
		<u>4.50</u>		<u>\$2,809.35</u>
Subtotal Fees				\$2,809.35
Discount				0.00
Total Fees				2,809.35
Total Disbursements				394.36

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	3,203.71	2,809.35	394.36	35,392.88	34,983.00	409.88
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	950.40	950.40	0.00

07/07/22 16:03:27 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

Billed	0.00	0.00	0.00	3,172.95	3,172.95	0.00	31,223.25	31,223.25	15.52
Collected	0.00	0.00	0.00	3,172.95	3,172.95	0.00	31,238.77	31,223.25	15.52
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	3,203.71	2,809.35	394.36						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 04/19/22
 Proforma Number: 1170515

Matter #: 375323.00008

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Claims

Client/Matter Joint Group # 375323-1

Client Matter Number:

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/06/22	8687519	Evaluate tax issues. TC with Zaro and email with IRS regarding tax issues.	Kraus, Katherine	0.90	627.75	627.75	WO	HD	TR	_____
01/06/22	8690437	Evaluate status/emails with counsel and Receiver related to the tax issues, follow-up thereon (.5). Email with investor claimant as to the claims and IRS (.2).	Zaro, David	0.70	585.90	1,213.65	WO	HD	TR	_____
01/07/22	8691447	Follow-up to assess Receiver tax counsel, account evaluation of tax issues, strategy for dealing with IRS, returns, prompt determination and assessment (.4). Call with tax counsel related to strategy and approach, email related to the same (.5). Email with claimant Mendes/counsel, IRS related to taxes (.2).	Zaro, David	1.10	920.70	2,134.35	WO	HD	TR	_____
01/10/22	8691493	Emails with counsel, assess IRS response to tax counsel and assess next steps, then call with Receiver counsel (.6). Call with investor claimant, follow-up with Receiver related to claim (.2).	Zaro, David	0.80	669.60	2,803.95	WO	HD	TR	_____
01/14/22	8696050	Several emails/calls with Receiver/tax counsel as to IRS communications and	Zaro, David	0.40	334.80	3,138.75	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered strategy.	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/18/22	8696543	TC with Leonard Brown (IRS) regarding income tax issues.	Kraus, Katherine	0.80	558.00	3,696.75	WO	HD	TR	_____
01/18/22	8699055	Several emails with IRS and tax counsel related to tax return.	Zaro, David	0.40	334.80	4,031.55	WO	HD	TR	_____
01/19/22	8700131	Review options and issues related to the IRS in light of the IRS response to returns and expedited review (.4). Several calls related to claims and timing as to the claims (.3).	Zaro, David	0.70	585.90	4,617.45	WO	HD	TR	_____
01/20/22	8699327	Email with Leonard Brown (IRS) regarding tax issues.	Kraus, Katherine	0.20	139.50	4,756.95	WO	HD	TR	_____
01/21/22	8699945	Email with IRS (Leonard Brown) regarding income tax issues.	Kraus, Katherine	0.20	139.50	4,896.45	WO	HD	TR	_____
01/24/22	8704924	Evaluate IRS response and follow-up emails with counsel related to taxes and Receiver concerning IRS claim, follow-up as to next steps.	Zaro, David	0.80	669.60	5,566.05	WO	HD	TR	_____
01/25/22	8703807	Conference with Zaro re. tax issues.	Kraus, Katherine	0.20	139.50	5,705.55	WO	HD	TR	_____
01/25/22	8705169	Follow-up on claimant call as to the claim and distribution issues (.2). Conferences with the Receiver and tax counsel related to tax returns/IRS claims, follow-up (.4).	Zaro, David	0.60	502.20	6,207.75	WO	HD	TR	_____
01/27/22	8714167	Call/email with Receiver and tax counsel related to IRS and response/approach.	Zaro, David	0.40	334.80	6,542.55	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/28/22	8714332	Emails with investor claimants and communications regarding alternative approaches to the IRS to secure IRS responses to return (.4). Email with Receiver related to the returns and next steps (.2).	Zaro, David	0.60	502.20	7,044.75	WO	HD	TR	_____
01/31/22	8711475	Email with IRS regarding tax issues.	Kraus, Katherine	0.20	139.50	7,184.25	WO	HD	TR	_____
01/31/22	8714394	Evaluate email communications with Receiver and tax counsel related to the IRS, approach to expedite review, email to Mr. Brown, follow-up call with Receiver (.7). Call with several investor claimants and counsel related to claims issues and follow-up (.4).	Zaro, David	1.10	920.70	8,104.95	WO	HD	TR	_____
02/02/22	8716902	Review IRS correspondence. Email with Zaro.	Kraus, Katherine	0.40	279.00	8,383.95	WO	HD	TR	_____
02/02/22	8720151	Email/voicemail related to the claims and IRS proof of claim (.3). Review IRS claims, call with Receiver and follow-up with tax counsel (.8).	Zaro, David	1.10	920.70	9,304.65	WO	HD	TR	_____
02/03/22	8720154	Emails with Receiver and tax counsel to follow-up on the Receiver tax returns, IRS proof of claim and analysis of Receiver response (.5). Brief research/analysis as to Receiver tax liability (.4).	Zaro, David	0.90	753.30	10,057.95	WO	HD	TR	_____
02/04/22	8719186	TC and email with IRS.	Kraus, Katherine	0.30	209.25	10,267.20	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/10/22	8724592	TC and email with IRS.	Kraus, Katherine	0.60	418.50	10,685.70	WO	HD	TR	_____
02/10/22	8726984	Meeting with tax counsel and follow-up email related to the tax claims of IRS and resolution (.4). Emails with counsel related to the tax issues, prompt assessment and follow-up (.4).	Zaro, David	0.80	669.60	11,355.30	WO	HD	TR	_____
02/11/22	8725783	TC with IRS.	Kraus, Katherine	0.30	209.25	11,564.55	WO	HD	TR	_____
02/11/22	8727005	Work with Receiver on approach to enlisting the assistance of Congressman to address IRS continued delays.	Zaro, David	0.40	334.80	11,899.35	WO	HD	TR	_____
02/14/22	8727295	Reach out to IRS. TC with Zaro.	Kraus, Katherine	0.40	279.00	12,178.35	WO	HD	TR	_____
02/14/22	8729982	Emails/calls with Receiver and tax counsel related to the further responses from IRS, follow-up regarding same (.4).	Zaro, David	0.40	334.80	12,513.15	WO	HD	TR	_____
02/15/22	8730013	Research/analysis of the tax issues, commence work on the draft letter to congress person and follow-up (.9). Conference with Receiver concerning strategy to address the IRS issues and follow-up (.3).	Zaro, David	1.20	1,004.40	13,517.55	WO	HD	TR	_____
02/16/22	8730259	Email with IRS.	Kraus, Katherine	0.10	69.75	13,587.30	WO	HD	TR	_____
02/17/22	8734019	Email/call with tax counsel as to IRS responses related to taxes, follow-up.	Zaro, David	0.30	251.10	13,838.40	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/21/22	8734268	Review several emails from investor claimants in USFIA, then draft response email related to claims matters.	Zaro, David	0.40	334.80	14,173.20	WO	HD	TR	_____
02/22/22	8735509	Several emails with claimants/Receiver counsel and call with Receiver related to payment of claims/IRS issues, follow-up.	Zaro, David	0.30	251.10	14,424.30	WO	HD	TR	_____
02/23/22	8736825	Work on the draft letter to Rep. Chu as to the Internal Revenue Service and request for assistance (.7). Revise letter related to IRS/Rep. Chu, follow-up email with Receiver/counsel (1.1).	Zaro, David	1.80	1,506.60	15,930.90	WO	HD	TR	_____
02/24/22	8736671	Revisions to letter to Congresswoman Chu regarding issues with IRS and review of receivership entity tax returns, confer with counsel re: same	Fates, Edward (Ted)	0.50	321.75	16,252.65	WO	HD	TR	_____
02/24/22	8743783	Further work/revisions to the draft letter to Congresswomen Chu, follow-up thereon with email communications to/from Receiver and counsel (.6). Several emails and analysis of regulations, follow-up call with Receiver (.8).	Zaro, David	1.40	1,171.80	17,424.45	WO	HD	TR	_____
02/25/22	8744180	Analysis of Receiver's emails, constructive trust research, alternative approach to IRS claim and prospective motion.	Zaro, David	0.60	502.20	17,926.65	WO	HD	TR	_____
02/28/22	8740633	Revise letter to Judy Chu.	Kraus, Katherine	1.00	697.50	18,624.15	WO	HD	TR	_____
02/28/22	8744358	Call with Receiver related to the IRS issues, alternative strategy, motion (.3). Emails	Zaro, David	2.20	1,841.40	20,465.55	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		with tax counsel related to the IRS, follow-up with Receiver counsel regarding strategy (.4). Analysis of Department of Justice tax directive, revise letter to Congresswoman, follow-up email to Receiver/counsel (.9). Conference with the Receiver to review letter, revisions, strategy and approach to letter, motion, follow-up (.6).								
03/01/22	8748071	Revise draft letter, review related emails as to claims/IRS engagement, follow-up emails and call with counsel.	Zaro, David	1.10	920.70	21,386.25	WO	HD	TR	_____
03/02/22	8749036	Several calls from investors related to claims (.2). Email related to letter to Congresswoman Chu regarding IRS issues (.2).	Zaro, David	0.40	334.80	21,721.05	WO	HD	TR	_____
03/03/22	8750880	Research/analysis and further revisions to draft of the Receiver's distribution plan amendment and follow-up (.9). Call with investor claimant (.1). Follow-up on letter seeking assistance with agency (.2).	Zaro, David	1.20	1,004.40	22,725.45	WO	HD	TR	_____
03/04/22	8752159	Several emails/analysis of issues and work on draft of the memorandum of points and authorities, including research regarding constructive trust matters, follow-up.	Zaro, David	2.60	2,176.20	24,901.65	WO	HD	TR	_____
03/09/22	8754523	Call with investor claimant related to claims (.2). Call as to the IRS tax claim with counsel, follow-up (.2).	Zaro, David	0.40	334.80	25,236.45	WO	HD	TR	_____
03/14/22	8759314	Call with Receiver related to the amended plan (.2). Email related to IRS collection issues (.2).	Zaro, David	0.40	334.80	25,571.25	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/17/22	8762347	Call from claimant related to claim status and follow-up (.2). Call with tax counsel related to the IRS and collection issues (.4).	Zaro, David	0.60	502.20	26,073.45	WO	HD	TR	_____
03/18/22	8762414	Email and TC with Zaro. Email and TC with Chu and Brown (IRS).	Kraus, Katherine	1.10	767.25	26,840.70	WO	HD	TR	_____
03/18/22	8767446	Call with tax counsel and email to Receiver as to IRS claims, collection agency, follow-up as to tax returns and IRS.	Zaro, David	0.80	669.60	27,510.30	WO	HD	TR	_____
03/25/22	8770480	Email with Zaro re. tax issues.	Kraus, Katherine	0.20	139.50	27,649.80	WO	HD	TR	_____
03/25/22	8777200	Several emails/call regarding IRS communications as to prompt assessment and prompt determination (.4). Call/email related to IRS response, follow-up on congress person (.3).	Zaro, David	0.70	585.90	28,235.70	WO	HD	TR	_____
03/29/22	8777389	Several emails related to IRS tax issues with Congresswoman Chu's office (.4). Follow-up conference with tax counsel as to next steps (.2).	Zaro, David	0.60	502.20	28,737.90	WO	HD	TR	_____
03/31/22	8782249	Call with Receiver related to claims issues and IRS communications (.2). Call with IRS related to Receiver's tax returns and follow-up (.2). Call/emails with tax counsel and Receiver (.4).	Zaro, David	0.80	669.60	29,407.50	WO	HD	TR	_____
04/01/22	8786560	Several emails/calls with Receiver related to the IRS claims, letter response (.4). Follow-up on the IRS responses and the prompt determination/assessment requests	Zaro, David	0.70	585.90	29,993.40	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered (.3).	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/04/22	8787181	Emails/calls related to records for IRS and follow-up as to the IRS request for information (.7). Work on draft letter to the IRS related to records/communications and follow-up (1.0).	Zaro, David	1.70	1,422.90	31,416.30	WO	HD	TR	_____
04/07/22	8791103	Calls with Receiver and follow-up with the Internal Revenue Service related to tax returns and calls to IRS, assess strategy.	Zaro, David	0.70	585.90	32,002.20	WO	HD	TR	_____
04/12/22	8793239	Call/email with the Receiver related to the IRS claim/distribution plan, motion to amend, dispute with IRS claim.	Zaro, David	0.30	251.10	32,253.30	WO	HD	TR	_____
04/13/22	8793308	Review several emails related to the Receiver's amended plan, motion and follow-up (.2). Conference call, follow-up with Receiver and SEC counsel related to amended plan (.4).	Zaro, David	0.60	502.20	32,755.50	WO	HD	TR	_____
04/14/22	8797493	Call with Receiver and SEC counsel related to the motion to amend the plan, meet and confer, follow-up regarding same.	Zaro, David	0.40	334.80	33,090.30	WO	HD	TR	_____
04/19/22	8801462	Emails related to the California Franchise Tax Board claims, pending notice review document and follow-up with Receiver.	Zaro, David	0.40	334.80	33,425.10	WO	HD	TR	_____
05/02/22	8817568	Follow-up emails concerning Congressperson Chu and the IRS, the Receiver's notion to amend/IRS service.	Zaro, David	0.40	334.80	33,759.90	WO	HD	TR	_____
05/04/22	8818901	Call regarding IRS collection agency notices and Receiver responses (.3). Call	Zaro, David	0.50	418.50	34,178.40	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		with investor claimant as to claims status and timing of distribution (.2).								
05/09/22	8820974	Email with IRS re. tax issues.	Kraus, Katherine	0.50	348.75	34,527.15	WO	HD	TR	_____
05/11/22	8824204	Email and voicemail with various IRS representatives regarding tax issues.	Kraus, Katherine	0.80	558.00	35,085.15	WO	HD	TR	_____
05/24/22	8840748	Research constructive trust and proposed solution to IRS claim and lien priority (.8). Follow-up with tax counsel regarding IRS response to motion to amend and outstanding claim, further address possible settlement with IRS and strategy, follow-up on the amended motion (1.40) Call with the IRS counsel related to claim settlement (.2).	Zaro, David	2.40	2,008.80	37,093.95	WO	HD	TR	_____
05/29/22	8848235	Evaluate the IRS revisions to draft stipulation, and several emails to Receiver and counsel related to response.	Zaro, David	0.60	502.20	37,596.15	WO	HD	TR	_____
05/31/22	8848529	Follow-up on the Department of Justice/IRS response/revisions to the stipulation, call related to the Receiver response.	Zaro, David	0.40	334.80	37,930.95	WO	HD	TR	_____
06/01/22	8851852	Several emails with DOJ and call with Receiver related to the DOJ/IRS stipulation, SEC approval and follow-up (.8). Email with the SEC counsel and follow-up (.4). Follow-up on local rules/district court rules related to hearing/Stipulation (.6). Work on draft of the order and Court filing (.8).	Zaro, David	2.60	2,176.20	40,107.15	WO	HD	TR	_____
06/02/22	8854399	Several emails, call with tax counsel related to IRS stipulation, waiver of	Zaro, David	0.60	502.20	40,609.35	WO	HD	TR	_____

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered claims/jurisdiction.	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/09/22	8863753	Several emails/call with claimants as to the IRS stipulation (.2).	Zaro, David	0.20	167.40	40,776.75	WO	HD	TR	_____
06/15/22	8864983	Address call from the IRS regarding congressional inquiry and the response, evaluate the status of returns and prepare for call with IRS (1.1). Call with IRS and counsel related to IRS response to Receiver returns and audits (.3). Call to Mr. Seaman related to the IRS and responses/next steps (.4).	Zaro, David	1.80	1,506.60	42,283.35	WO	HD	TR	_____
06/16/22	8867714	Call with Receiver and counsel related to IRS refund, follow-up thereon (.3). Call to address prompt assessment issues with tax counsel (.2).	Zaro, David	0.50	418.50	42,701.85	WO	HD	TR	_____
06/17/22	8867727	Emails with IRS and follow-up with Receiver related to the IRS/returns (.4). Call to Receiver related to IRS, returns and prompt assessment (.2).	Zaro, David	0.60	502.20	43,204.05	WO	HD	TR	_____
06/21/22	8873183	Emails with counsel and Receiver, follow-up to address 4810 forms and email communications with the IRS, follow-up regarding same.	Zaro, David	0.80	669.60	43,873.65	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	45.20	837.00	37,832.40
001665	Fates, Edward (Ted)	0.50	643.50	321.75
002372	Kraus, Katherine	8.20	697.50	5,719.50

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
		53.90		\$43,873.65
Subtotal Fees				\$43,873.65
Discount				0.00
Total Fees				43,873.65
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,074.60	1,074.60	0.00	46,287.45	46,287.45	0.00	290,620.26	290,620.26	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	11,213.19	11,213.19	0.00
Billed	0.00	0.00	0.00	26,574.93	26,574.93	0.00	231,509.25	231,509.25	0.00
Collected	0.00	0.00	0.00	26,574.93	26,574.93	0.00	231,509.25	231,509.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	47,263.95	47,263.95	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

07/07/22 16:03:28 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
SEAMAN, THOMAS (Receiver)
1 Park Plaza, Suite 580
Irvine, CA 92614

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 04/19/22
 Proforma Number: 1170515

Matter #: 375323.00010

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Distribution

Client/Matter Joint Group # 375323-1

Client Matter Number:

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/01/22	8745064	Advise on potential amendment to distribution plan to subordinate IRS tax claims and related issues	Fates, Edward (Ted)	0.40	257.40	257.40	WO	HD	TR	_____
03/01/22	8748080	Analysis of issues related to the distribution plan and proposed amendment to the plan (.7). Draft motion to amend plan, draft amended plan, and points and authorities (1.6)	Zaro, David	2.30	1,925.10	2,182.50	WO	HD	TR	_____
03/02/22	8749018	Work on draft of the Receiver's amended distribution plan, research related to subordination issues and IRS claims (1.4). Call with Receiver re: amended distribution plan (.2).	Zaro, David	1.60	1,339.20	3,521.70	WO	HD	TR	_____
03/09/22	8754527	Conference with tax counsel related to terms of amended plan for distribution/subordination.	Zaro, David	0.40	334.80	3,856.50	WO	HD	TR	_____
03/14/22	8887884	Work on the plan amendment and the memorandum of points and authorities/motion to amend the plan, follow-up regarding same (1.8).	Zaro, David	1.80	1,506.60	5,363.10	WO	HD	TR	_____

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/15/22	8758503	Revisions to motion to amend distribution plan and proposed amended plan	Fates, Edward (Ted)	0.70	450.45	5,813.55	WO	HD	TR	_____
03/15/22	8760008	Work on the memorandum of points and authorities related to the motion to amend the distribution plan and follow-up (1.1). Call with Receiver and emails related to amended plan terms/motion (.5).	Zaro, David	1.60	1,339.20	7,152.75	WO	HD	TR	_____
03/16/22	8761635	Analysis of Receiver comments to draft brief, research/analysis of the issues related to constructive trust, revise document (2.2). Conference with the Receiver, follow-up with regard to the plan/amendment (.4). Further revisions/research related to the constructive trust, follow-up emails to Receiver/counsel re: amended plan/motion (1.2).	Zaro, David	3.80	3,180.60	10,333.35	WO	HD	TR	_____
03/17/22	8762350	Work on the issues related to amended plan/reserve and emails with Receiver related to reserve amount (.6). Emails with counsel and Receiver related to reserves (.2). Work on the declaration of Receiver to support motion (.8).	Zaro, David	1.60	1,339.20	11,672.55	WO	HD	TR	_____
03/18/22	8767443	Work on draft of the Receiver's declaration in support of the motion to amend the Distribution Plan, follow-up thereon (.4). Revise Receiver declaration, evaluate judicial notice and emails with the Receiver and counsel related to declaration and tax issues (1.2).	Zaro, David	2.60	2,176.20	13,848.75	WO	HD	TR	_____
03/21/22	8767588	Draft further revisions to Seaman declaration in support of the amended	Zaro, David	2.60	2,176.20	16,024.95	WO	HD	TR	_____

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		plan/motion (1.4). Work on further revisions and incorporate Receiver comments into the Plan amendment, memorandum of points and authorities, follow-up (1.2).								
03/22/22	8767674	Calls/emails with the Receiver to address the further revisions to the amended plan/revisions (.3). Emails/call related to form of order, SEC meet/confer and hearing/IRS notice (.3).	Zaro, David	0.60	502.20	16,527.15	WO	HD	TR	_____
03/23/22	8772113	Evaluate Receiver email, IRS letters and follow-up responses, email to congresswoman (.7). Finalize declaration of the Receiver, call with Receiver and follow-up (.4). Call with Receiver related to the IRS amended plan and SEC meet/confer (.2).	Zaro, David	1.30	1,088.10	17,615.25	WO	HD	TR	_____
03/24/22	8772175	Call/email with the Receiver related to amended plan, SEC meet/confer.	Zaro, David	0.30	251.10	17,866.35	WO	HD	TR	_____
04/12/22	8793240	Call/email with the Receiver related to the IRS claim/distribution plan, motion to amend, dispute with IRS claim.	Zaro, David	0.30	251.10	18,117.45	WO	HD	TR	_____
04/18/22	8798559	Call related to the motion to amend the plan of distribution (.2). Email to claimant related to distribution plan amendment (.2).	Zaro, David	0.40	334.80	18,452.25	WO	HD	TR	_____
04/20/22	8803285	Work on final version of amended distribution plan, follow-up (.5). Call/email with Receiver related to amended plan (.2).	Zaro, David	0.70	585.90	19,038.15	WO	HD	TR	_____
04/21/22	8803296	Work to finalize the amended plan, notice/brief and Receiver declaration (.6).	Zaro, David	1.20	1,004.40	20,042.55	WO	HD	TR	_____

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		all with counsel related to notice to IRS, and research notice issues as to IRS (.6).								
04/22/22	8808552	Further revisions to briefs and address notice, filing issues as to amended plan, call with Receiver and counsel (.4). Revise draft of the order on amended plan (.4). Email/call with Receiver related to IRS communications (.4).	Zaro, David	1.20	1,004.40	21,046.95	WO	HD	TR	_____
04/26/22	8804421	Respond to inquiry from counsel for investors re: distributions	Fates, Edward (Ted)	0.20	128.70	21,175.65	WO	HD	TR	_____
04/28/22	8810874	Evaluate communications with the IRS and Congresswoman Chu, follow-up letter/email to Congresswoman to enlist assistance.	Zaro, David	0.70	585.90	21,761.55	WO	HD	TR	_____
05/03/22	8817597	Evaluat means to engage the IRS and call with claimant related to the status of distribution plan (.3). Follow-up with Receiver and tax counsel as to IRS communications, next steps (.3).	Zaro, David	0.60	502.20	22,263.75	WO	HD	TR	_____
05/04/22	8818900	Emails and meeting with tax counsel as to strategy related to the Amended Plan/IRS engagement (.4). Emails with counsel and Receiver as to collection notices from IRS, address the Receiver's response (.5).	Zaro, David	0.90	753.30	23,017.05	WO	HD	TR	_____
05/06/22	8822619	Call/email with the Receiver and tax counsel related to the amended plan.	Zaro, David	0.40	334.80	23,351.85	WO	HD	TR	_____
05/11/22	8825056	Email/call with tax counsel related to IRS response and emails (.4). Call with Receiver related to the tax issues, the IRS response, motion to amend and strategy	Zaro, David	1.70	1,422.90	24,774.75	WO	HD	TR	_____

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		(.3). Call with counsel for the SEC related to the DOJ and IRS response continuance (.4). Follow-up on district court rules related to continued hearing as to amended motion, next steps, email with counsel (.6).								
05/12/22	8828094	Work on the draft of application stipulation to continue motion, declaration and order (1.1). Call with counsel for the IRS and SEC related to the motion to amend (.4). Call with Receiver related to motion to amend (.3). Follow-up emails regarding motion, stipulation filing and next steps (.4).	Zaro, David	2.20	1,841.40	26,616.15	WO	HD	TR	_____
05/16/22	8832328	Follow-up on call/email with Receiver and counsel related to response of IRS-DOJ (.3). Evaluate prior communications and draft memorandum to counsel for IRS/DOJ as to IRS communications and follow-up (1.2).	Zaro, David	1.50	1,255.50	27,871.65	WO	HD	TR	_____
05/17/22	8832341	Review of court order and emails with SEC/IRS and the Receiver regarding plan amendment (.4). Call with Receiver as to further IRS communications, follow-up regarding same (.2).	Zaro, David	0.60	502.20	28,373.85	WO	HD	TR	_____
05/25/22	8840784	Several calls with the Receiver and counsel related to IRS stipulation regarding plan treatment.	Zaro, David	0.40	334.80	28,708.65	WO	HD	TR	_____
05/26/22	8847763	Analysis of plan and distribution issues, then prepare draft of stipulation with SEC and IRS as to IRS claim and distribution priorities.	Zaro, David	1.40	1,171.80	29,880.45	WO	HD	TR	_____

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/27/22	8847942	Revise draft of the stipulation related to IRS claims and amended plan motion, follow-up (1.4). Call with Receiver/counsel re: stipulation (.7). Several emails/calls with Receiver and then counsel for SEC/IRS as to terms of the sale (.5).	Zaro, David	2.60	2,176.20	32,056.65	WO	HD	TR	_____
06/01/22	8851885	Conferences with tax counsel and Receiver related to the Chen/USFIA distribution plan, follow-up.	Zaro, David	0.30	251.10	32,307.75	WO	HD	TR	_____
06/01/22	8867554	Advise on issues relating to interim distribution of receivership funds	Fates, Edward (Ted)	0.30	193.05	32,500.80	WO	HD	TR	_____
06/03/22	8858971	Evaluate the existing distribution plan, review issues concerning methods of distribution (.6). Follow-up call with Receiver related to the plan notice/distribution issues (.3).	Zaro, David	0.90	753.30	33,254.10	WO	HD	TR	_____
06/06/22	8858990	Research/analysis of the receiver obligations as to payments, method of payment as to overseas investors, confer with counsel as to plan issues.	Zaro, David	1.10	920.70	34,174.80	WO	HD	TR	_____
06/09/22	8863755	Several emails/call with claimants as to the IRS stipulation (.2). Follow-up re: Court as to the stipulation, timing, distribution requirements (.2).	Zaro, David	0.40	334.80	34,509.60	WO	HD	TR	_____
06/09/22	8887892	Follow-up re: Court as to the stipulation, timing, distribution requirements (.2).	Zaro, David	0.20	167.40	34,677.00	WO	HD	TR	_____
06/10/22	8863785	Several emails with the Receiver/counsel related to stipulation issues, notice and distribution process.	Zaro, David	0.40	334.80	35,011.80	WO	HD	TR	_____

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/14/22	8864907	Several investor calls related to distribution issues, timing and follow-up.	Zaro, David	0.40	334.80	35,346.60	WO	HD	TR	_____
06/15/22	8863079	TC with Susanne Larson and David Zaro re. tax issues.	Kraus, Katherine	0.50	348.75	35,695.35	WO	HD	TR	_____
06/15/22	8864995	Several calls with counsel and Receiver related to the timing, notice and process issues regarding distribution (.4). Evaluate Court's order approving the Stipulation with IRS/SEC And follow-up (.3). Call with Receiver and counsel related to the order and call realted to distrubiton of assets/overseas issues and follow-up (.4). Emails with the IRS/SEC related to the order (.3).	Zaro, David	1.40	1,171.80	36,867.15	WO	HD	TR	_____
06/16/22	8867703	Several emails/call with creditor and Receiver as to distribution and timing issues.	Zaro, David	0.30	251.10	37,118.25	WO	HD	TR	_____
06/21/22	8868524	Analyze and advise on issues relating to interim distributions to investors	Fates, Edward (Ted)	0.40	257.40	37,375.65	WO	HD	TR	_____
06/21/22	8873185	Work on the distribution issues/cost estimates (.3). Several emails and analysis of potential distribution issues/validation of recipients (.4).	Zaro, David	0.70	585.90	37,961.55	WO	HD	TR	_____
06/24/22	8874891	Email to the Receiver related to claimant inquiry and follow-up.	Zaro, David	0.20	167.40	38,128.95	WO	HD	TR	_____

Proforma Summary

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	43.60	837.00	36,493.20
001665	Fates, Edward (Ted)	2.00	643.50	1,287.00
002372	Kraus, Katherine	0.50	697.50	348.75
				\$38,128.95
Subtotal Fees				\$38,128.95
Discount				0.00
Total Fees				38,128.95
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,238.75	2,238.75	0.00	40,367.70	40,367.70	0.00	62,439.75	62,439.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	161.10	161.10	0.00
Billed	0.00	0.00	0.00	1,036.35	1,036.35	0.00	21,910.95	21,910.95	0.00
Collected	0.00	0.00	0.00	1,036.35	1,036.35	0.00	21,910.95	21,910.95	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	40,367.70	40,367.70	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

07/07/22 16:03:30 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
SEAMAN, THOMAS (Receiver)
1 Park Plaza, Suite 580
Irvine, CA 92614

07/07/22 16:03:31 PROFORMA STATEMENT FOR MATTER 375323.00011 (Thomas A. Seaman, Receiver for US Fine I) (Employment & Professional Services)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 01/27/22
 Proforma Number: 1170515

Matter #: 375323.00011

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Employment & Professional Services

Client/Matter Joint Group # 375323-1

Client Matter Number:

Fees for Matter 375323.00011.(Employment & Professional Services)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
03/03/22	8747965	Work on AM 23rd interim fee application	Fates, Edward (Ted)	0.30	193.05	193.05	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.30	643.50	193.05
		0.30		\$193.05
Subtotal Fees				\$193.05
Discount				0.00
Total Fees				193.05
Total Disbursements				0.00

Attorney Billing Instructions

- | | |
|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL | <input type="checkbox"/> Hold |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> Transfer All |

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; copies @ .15

07/07/22 16:03:31 PROFORMA STATEMENT FOR MATTER 375323.00011 (Thomas A. Seaman, Receiver for US Fine I) (Employment & Professional Services)

Account Summary – As Of 07/07/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	193.05	193.05	0.00	26,009.55	26,009.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	257.40	257.40	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	25,559.10	25,559.10	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	25,559.10	25,559.10	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	193.05	193.05	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614