

ROBB EVANS & ASSOCIATES LLC

Temporary Receiver of

**Homeland Financial Services, National Support Services, LLC, United Debt Recovery, LLC,
Freedom First Financial, LLC, Prosper Financial Solutions,
USA Debt Co, LLC, aka USADEBT.CO.COM and
Monitor of Nationwide Support Services, Inc.**

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**Federal Trade Commission v. Dennis Connelly, et al.
CASE No. SACV 06-701 DOC (RNBx)**

**Report of Temporary Receiver's and Monitor's Activities for the
Period August 10, 2006 Through August 31, 2006**

Filed September 14, 2006

FILED

2006 SEP 14 PM 3:20

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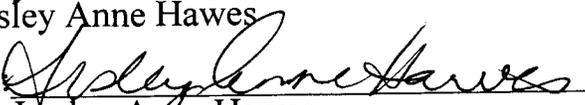
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11 FEDERAL TRADE COMMISSION,
12 Plaintiff,
13 v.
14 DENNIS CONNELLY, et al.,
15 Defendants.

CASE NO. SACV-06-701 DOC
(RNBx)

**REPORT OF TEMPORARY
RECEIVER'S AND MONITOR'S
ACTIVITIES FOR THE PERIOD
AUGUST 10, 2006 THROUGH
AUGUST 31, 2006**

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17 Robb Evans and Robb Evans & Associates LLC as Temporary Receiver of
18 Homeland Financial Services, Inc. and other related and affiliates entities and as
19 Monitor of Nationwide Support Services, Inc. hereby submits its Report of
20 Temporary Receiver's and Monitor's Activities August 10, 2006 Through August
21 31, 2006.

22 Dated: September 14, 2006

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ROBB EVANS and ROBB EVANS & ASSOCIATES LLC.
Temporary Receiver of
Homeland Financial Services, Inc., et al.
&
Monitor of
Nationwide Support Services, Inc.

REPORT OF TEMPORARY RECEIVER'S & MONITOR'S ACTIVITIES
AUGUST 10, 2006 THROUGH AUGUST 31, 2006

This report covers the activities of the Temporary Receiver¹ and the Monitor¹ since the inception of the temporary receivership and the appointment of the Monitor. This is the first Report to the Court on the progress of the Temporary Receiver and the Monitor. It does not constitute an audit of financial condition and is intended only to provide information for use by the Court in assessing the progress of the Temporary Receiver and the Monitor.

RECEIVERSHIP DEFENDANTS AND AFFILIATED ENTITIES

Summary of Fees Collected from Consumers and Results of Business Operations

Set forth later in this report are complete details of fees collected by the Receivership Defendants and affiliated entities from consumers, and discussions of the results of business operations. In brief summary, from November 2001 through June 2006 this group collected \$41.4 million from consumers as fees for debt negotiation services. The fees arose from 17,842² consumers contracting (through September 30, 2005) to have 97,002 debts (mostly credit cards) totaling \$495 million negotiated by the group to obtain reduced settlement amounts.

From November 15, 2001 through September 30, 2005, 12,706 debts with original balances of \$60.7 million were settled for \$35.5 million. The settlements averaged 58.5% of the original balance indicating the entire consumer benefit was \$25.2 million before taxes for discharge of indebtedness, compared to the \$41.4 million paid by all consumers for fees.

The settled debt balance of \$60.7 million was 12.3% of the \$495 million total debts turned over for negotiation. During the same period, the database shows that consumers cancelled

¹ Reference to the Temporary Receiver and the Monitor in this report means the Temporary Receiver, the Monitor, the Temporary Receiver's and the Monitor's deputies, staff, and counsel.

² All data, except fees, are maintained and were furnished by employees responsible for the GoldMine database, now under the control of the monitored entity, Nationwide Support Services, Inc. The GoldMine database is a relational database designed to manage a sales process by organizing customer service issues, and current and past sales activities, with embedded forecasts and pipeline reporting. The system has received some additional custom modifications giving it added features and functionality.

negotiation services for debts totaling \$349.9 million, or 70.7% of the \$495 million turned-over debts.

Robina Capital Inc. dba Prosper Financial Solutions (Prosper) with Ownership by Joanne Garneau

Custody, Control and Possession

On August 10, 2006, the Temporary Receiver entered the business premises of Prosper at 1031 Calle Recodo, San Clemente, CA. The Temporary Receiver secured the business premises by changing the locks and took custody, control, and possession of all assets and documents on the business premises. The Temporary Receiver completed a photographic inventory of receivership assets and attempted to obtain pertinent information from all employees on site. Two telemarketing employees refused to provide information and left the premises. The remaining employees were cooperative.

Soon after the Temporary Receiver took control of the premises, Art Garneau, spouse of Joanne Garneau, arrived and identified himself as one of the owners. Joanne Garneau arrived shortly thereafter and identified herself as the other owner. The Temporary Receiver served both with a copy of the Temporary Restraining Order. Both were cooperative although they declined to discuss the operations of the business until they conferred with their attorney.

Prosper was previously a fictitious business name of defendant Joanne Garneau, aka Joanne Torkelson. The corporate documents found at the premises included a "Certificate of Business: Fictitious Firm Name" filed April 4, 2005 with Clark County Nevada, which stated that Prosper later became a fictitious business name of Robina Capital Inc. (Robina). A search of the Nevada Secretary of State's records showed Robina filed for Articles of Incorporation on August 22, 2002. Officers listed are Joanne Garneau, President and Art Garneau, Secretary/Treasurer.

Under Tab 1 is a summary of cash receipts and cash disbursements of Prosper. The summary details that between September 20, 2002 and June 30, 2006, in addition to certain other receipts, Prosper received commission income totaling approximately \$4.2 million. Prosper received commission income from Homeland Financial Services, Inc. and Financial Liberty Services, LLC totaling approximately \$3,617,000, of which approximately \$322,000 was received by Joanne Garneau as a sole proprietor and approximately \$3,295,000 was received by Robina. Homeland Financial Services, Inc. and Financial Liberty Services, LLC are companies equally owned by Dennis Connelly and Wade Torkelson and are discussed in subsequent sections of this report.

From the commissions, approximately \$2.7 million was paid to companies substantially or wholly owned by Joanne Garneau and Art Garneau, including Headlands Resources, Inc.

(discussed in a later section of this report), approximately \$535,000 was paid as in-house sales commissions, and the remainder was paid for other purposes.

Currently, Prosper is receiving commission income from Nationwide Support Services, Inc., the monitored entity that became operative on October 1, 2005 and is discussed in a later section of this report. Between October 1, 2005 and June 30, 2006, Prosper received commission income totaling approximately \$565,000 from Nationwide Support Services, Inc.

Business Operations

Prosper is in the debt settlement business. It settles primarily credit card debt, but also works on other types of unsecured debt as well. In telemarketing scripts located on site, Prosper refers to itself as both the “largest debt settlement company” and “one of the largest debt settlement companies” in the nation. In actuality, Prosper is a company promoting debt settlement programs, enrolling customers, and receiving commissions from service providers. For the enrolled consumers, debt negotiation and other service functions are now performed by Nationwide Support Services, Inc., and previously were performed by companies owned by Dennis Connelly and Wade Torkelson.

Prosper generates consumer leads from its website and purchases other leads from companies specializing in debt consolidation leads. Leads are reviewed by both Ms. Garneau and the sales manager, and are then assigned to telemarketers. The telemarketers use detailed scripts in their sales efforts with prospects and are instructed to follow them verbatim. These scripts are refined periodically and are tailored to counter objections raised by potential clients. Ms. Garneau and the sales manager reportedly closely monitor the telemarketers.

This appears to be a high-pressure sales environment. The Temporary Receiver noted that the sales goal for the month of August 2006 was \$3,500,000 in consumer debt. Telemarketers that do not reach assigned goals are replaced. The goals are \$87,500 minimum debt enrollment or five consumers per telemarketer per week. If goals are not met for a particular week, the telemarketers are required to make up the difference the following week. If, by the end of the third week, the telemarketers have not met the cumulative \$262,500 in consumer debt or 15 consumers, they are terminated.

The sales manager is paid a salary of \$75,000 per year. In addition, he is paid a monthly bonus incentive program based on a percentage of the total debt enrolled for the month. Bonuses are progressive and start at 0.05% for the first \$2.9 million, 0.075% for the next \$500,000, and 0.10% for the next \$1.5 million.

All telemarketers are paid \$350.00 per week for their first 30 days of employment. After 30 days, they are paid solely on commission at 1.25% of debt enrollment plus periodic bonus incentive programs.

The sale process involves a potential client preparing a “Client Personal Information” form, an “Income and Expense Worksheet”, and a “Client Creditor Worksheet” and submitting them to the telemarketer along with copies of creditor statements to be settled. A settlement plan is then drafted for the consumer’s approval using 53% of the outstanding debt as the settlement amount. Prosper’s claims of actual settlements vary between 20% and 60% of the outstanding debt and reductions in monthly payments of 30%. Ms. Garneau chose to use a settlement rate of 53% in calculating the settlement savings to insure there are sufficient funds available for settlements. Some of the Prosper telemarketers and some Prosper materials stated the 53% figure included a 15% settlement fee. However, Ms. Garneau stated that in a typical settlement plan, the total debt is discounted to 53% and a 15% fee is added to create the settlement amount. Effective January 1, 2006, the 15% fee was processed by NoteWorld California, Inc. (NoteWorld), an ACH processor contracted with Nationwide Support Services, Inc. NoteWorld is discussed in a later section. Half of the 15% fee (as collected) was forwarded to and recorded by Robina as commission income. The other half (as collected) was forwarded to and recorded by Nationwide Support Services, Inc. as fee income. NoteWorld deposits all consumer payments reserved for settlements into a trust account at Bank of America. (See Nationwide Support Services, Inc. in a subsequent section for more detail.)

According to scripts found at Prosper’s offices, potential clients are told that dealing with Prosper is far superior to alternatives that include bankruptcy, using the equity in their residence for debt consolidation, or using not-for-profit consumer credit counselors. While Prosper does acknowledge the consumer’s credit will suffer while they are in the program, Prosper states that the impact on the individual’s credit is less severe by contracting with Prosper and that the consumer’s FICO credit score will immediately improve when all of the debt is settled. However, creditors are required by law to factually report the status of accounts and payment history. Individuals dealing with Prosper typically will see their credit deteriorate due to the length of delinquency. In some instances, the accounts will be shown as assigned for collection or charged off. In some instances, consumer accounts were not delinquent when they entered the program but became so under Prosper’s instruction to cease payments.

Consumers with equity in their residences were discouraged from using equity loans to pay off debt. Prosper’s sales script warned consumers they might run up credit card debt again, and it was not a safe idea to pay off unsecured debt with secured debt on a residence. Prosper makes it clear that when the debt is settled, it is the consumer’s responsibility to communicate with credit reporting agencies to have the settled accounts shown as zero balance and to have the charge-offs removed.

A “Welcome Packet” is sent to the consumer upon the consumer’s decision to enter the debt settlement program. Among other documents, the packet contains “Cease and Desist letters for Creditors”, “Power of Attorney for Creditors”, and a “Letter of Hardship for Creditors”. The consumers are instructed to complete the forms and send them to each of

the creditors by certified mail. The return receipt is to be sent to the consumer for his records. The Power of Attorney authorizes Prosper to act on the consumer's behalf.

Consumers are instructed to cease making payments and are advised that the settlement process will begin within seven to ten days. In actuality, the settlement process begins when the consumers mail the Cease and Desist letters. Consumers are given a script to read to creditors that refers all callers to the Prosper processing department.

The initial documentation given to consumers states that unless contacted by a creditor to discuss settlement, Prosper will take no action to settle accounts until the trust account balance reaches a level Prosper feels is sufficient, generally 40% to 50% of a single debt. In the interim, Prosper continues to collect commission payments on the 15% fee balance, while debt grows due to late charges and possible increased default interest. Many creditors initiate litigation or arbitration during this period. Prosper trivializes the process by stating it is similar to responding to a traffic ticket. Prosper states that it will aid in the defense of a client should this occur. One located script stated that Prosper owned a legal firm that would come to the aid of the client should creditors violate their consumer rights. According to Joanne Garneau, that script and claim have not been used for two years.

If a creditor does file suit against a consumer, the only support Prosper provides is copies of documents showing that the client is in a settlement program and recordings of conversations Prosper had with the creditor. Prosper's script indicates that it is extremely remote that the creditor will prevail in the action and if they do, it is "no big deal." Prosper states that the creditor cannot collect against the consumer's house until they move or die.

While the disclosure states that Prosper will not begin settlement negotiations without sufficient trust account balances, there are written complaints from clients alleging that is not what they were told. There is also internal correspondence that indicates an employee believed settlement discussions would begin immediately.

The following is a sample of complaints from three consumers to Prosper:

- NH³ wrote that he did not have the creditor letters in his hands in seven to ten days as promised. The letters finally arrived more than three weeks after he called to locate them. During that time creditors were calling daily. The legal department did not handle the arbitration letters as promised. No status follow up was done as promised. Creditor calls handled by Prosper were not made available online for his review. The settlement that was completed was at 71%, a figure he was able to duplicate on his own prior to dealing with Prosper. NH believes that with Prosper fees, interest, and penalties he could have paid the full amount to the credit card companies.

³ Names of consumers are limited to initials.

- PR wrote that she has been in the program for three years and paid over \$4,000 in fees. Only two accounts were settled in that period, with four remaining. One of the accounts settled was for \$9,000 and she entered the program with only a \$7,000 balance on the account. Of the four remaining, three creditors have filed suits and the balances continue to grow. She has missed work to deal with the lawsuits and her credit has been seriously impaired.
- KS wrote stating that she wanted to be removed from the program because none of her accounts has been settled after one year. She says that she was under the impression that her accounts were always being negotiated but was told that negotiations would not begin until the balance in her trust account reached a certain level. The Prosper employee she dealt with was under the impression they would be negotiated as well, but was corrected by the account services department.

Summary of Sales and Negotiation Activity

During the period from September 2002 through September 30, 2005, the GoldMine data shows that Prosper accepted for negotiation 6,090 debts totaling \$32.0 million. The data also shows that during the same period, 790 debts with original balances totaling \$4.8 million were settled for \$2.6 million. The settlements averaged 54.2% of the original balances indicating the entire consumer benefit was \$2.2 million before taxes for discharge of indebtedness, compared to the \$3.6 million commission income collected by Prosper from the fees paid by consumers (see earlier section of this report).

The settled debt balance of \$4.8 million was 15.0% of the \$32.0 million total debts turned over for negotiation. During the same period, the database shows that consumers cancelled negotiation services for debts totaling \$12.3 million, or 38.4% of the \$32.0 million turned-over debts.

Entities Equally Owned by or Associated with Dennis Connelly and Wade Torkelson

Custody, Control and Possession of Connelly and Torkelson Entities

On August 10, 2006, the Temporary Receiver entered business premises at 4425 Jamboree Road, Suite 140, Newport Beach, CA, which were the offices of Nationwide Support Services and the Receivership Defendants excluding Prosper, Freedom First Financial, LLC and USA Debt Co., LLC. Neither Dennis Connelly nor Wade Torkelson was present. The Temporary Receiver met with the person in charge of the accounting department and the accounting manager and obtained control of the electronic and hard copy accounting and business records (including off-site records) of the Receivership Defendants owned or associated with Dennis Connelly and Wade Torkelson. All personnel were cooperative and assisted the Temporary Receiver with the duties required by the District Court Order.

Homeland Financial Services, Inc. (Homeland)

Homeland was formed on November 15, 2001 with four original shareholders: Dennis Connelly (45%), Wade Torkelson (45%), Monique Farinha (5%), the ex-spouse of Mr. Torkelson, and Kelli Rundle (5%). Ms. Farinha and Ms. Rundle later released their ownership interest in Homeland. Their release of the 10% ownership interest in Homeland is discussed in detail in a later section.

In addition to about 15 outside debt settlement promotion companies, including Prosper, Homeland also had an in-house sales department of about 12 people to promote its debt settlement programs. Its back-end operation included customer service and debt negotiation and had a work force of about 50 to 60 people at the peak of the operation. The program enrollment agreements were between the participating consumers and Homeland. At the end of July 2004, Homeland ceased its operations and transferred its entire work force to National Support Services, LLC. Homeland paid 30% of the cash it received after August 1, 2004 to Financial Liberty Services, LLC for all services, including debt negotiation services, provided by National Support Services, LLC.

Homeland charged its consumers a service fee computed at 12% to 13% of the total debt outstanding at the date of the enrollment agreement. The up-front fee, which was about 40% of the service fee, was payable in the first two to three months and the remainder was due in eight to 12 monthly installments. Between November 15, 2001 (date of inception) and June 30, 2006, Homeland received total fees of approximately \$28.6 million from consumers, of which approximately \$7.6 million was paid as commissions and approximately \$5.4 million was paid to or for the benefit of Dennis Connelly, Wade Torkelson and companies owned by either of them.

Homeland contracted with Vanco as the ACH (automated clearing house) processor for fees and debt settlement funds received from its consumers. However, in late 2003 Homeland returned all debt settlement funds to its consumers and requested that the consumers make the settlement payments directly to the creditors upon settlement of debt.

Financial Liberty Services, LLC (Financial Liberty)

Financial Liberty, a Nevada limited liability company, equally owned by Messrs. Connelly and Torkelson, commenced its operations in August 2004. Financial Liberty is the sole member of a California limited liability company formed on July 14, 2004, National Support Services, LLC.

Unlike Homeland's, the program enrollment agreements were between the participating consumers and the outside debt settlement promotion companies. However, the fees were received by Financial Liberty through Vanco or NoteWorld.

Financial Liberty, a non-operating entity, recorded the fees received from consumers and the commissions paid to debt settlement promotion companies, and funded the entire operations of its wholly-owned subsidiary, National Support Services, LLC.

Between August 1, 2004 and June 30, 2006, Financial Liberty received total fees of approximately \$12.7 million from consumers, of which approximately \$5.0 million was paid as commissions to debt settlement promotion companies and approximately \$3.3 million was paid to Dennis Connelly, Wade Torkelson and companies owned by them.

Pursuant to a Purchase Agreement dated October 17, 2005, Nationwide Support Services, Inc. purchased Financial Liberty. The consideration was a \$1,560,000 promissory note, for which Nationwide Support Services, Inc. obtained Financial Liberty's future servicing rights under the support services agreements with (1) Prosper Financial Solutions, (2) Debt Management Systems, a company located in Florida, and (3) Help With Debt, a company located in New Hampshire. Nationwide Support Services, Inc. is discussed in a later section.

National Support Services, LLC (NSS)

On August 1, 2004, NSS, the wholly owned subsidiary of Financial Liberty, assumed the work force of Homeland and purchased the equipment and furniture of Homeland at their carrying value of \$303,951.07, which remains unpaid by NSS. In addition, Homeland loaned funds to NSS and paid certain operating expenses of NSS, which totaled \$460,769.82 and remains unpaid by NSS. In total, NSS owes \$764,720.89 to Homeland.

On July 19, 2005 NSS entered into a servicing agreement to be effective August 1, 2005 with NoteWorld. Unlike Vanco, NoteWorld would not only provide the regular ACH processing for fees collected from the consumers but would also hold the debt settlement funds deposited by the consumers in a trust account. For such services, NoteWorld charged a fee of \$7.50 per consumer per month, which was to be paid by the consumer. In addition to the \$7.50 NoteWorld monthly processing fee, a consumer would also pay a \$5.00 monthly banking fee to Financial Liberty through NoteWorld.

Between August 1, 2004 and June 30, 2006, NSS made payments totaling approximately \$800,000 to or for the benefit of Dennis Connelly and Wade Torkelson.

As described previously, on October 17, 2005 Financial Liberty, the parent of NSS, sold its future servicing rights under three support services agreements to Nationwide Support Services, Inc., which is discussed in more detail in a later section. On October 1, 2005, NSS had a work force of about 25 to 30 people, of which 17 to 20 people were doing customer service and debt negotiations, six people were in the accounting department and the remainder (including Wade Torkelson, Dennis Connelly and his spouse) were in administration. On December 24, 2005, NSS retained 10 people in the administration, accounting and data processing departments, and terminated the rest of its work force. On the same day, the terminated work force, including people performing customer service and

debt negotiations, were hired by Headlands Resources, Inc. (Headlands), a company formed on January 27, 2003 and owned by Joanne Garneau and Art Garneau.

In summary, after December 24, 2005, the customer service and debt negotiation functions of both NSS and Nationwide Support Services, Inc. were carried out by the ex-NSS work force who were now on the payroll of Headlands and leased to Nationwide Support Services, Inc. For such services, NSS paid \$60,000 to Nationwide Support Services, Inc. in 2006. According to Ms. Garneau, Headlands was formed as a human resources company to combine employees of Nationwide Support Services, Inc. and Prosper who could then enjoy such benefits as group medical insurance at cheaper rates than if they were employed by separate entities.

Also, NSS sold its office equipment and office supplies to Nationwide Support Services, Inc. for \$44,000 on April 30, 2006.

Freedom First Financial, LLC (Freedom First) / Nationwide Debt Services, LLC (NDS)

Anthony Fusco was the initial and only owner of NDS, a Connecticut limited liability company formed on March 18, 2004. Messrs. Connelly and Torkelson together held a 50% ownership interest and a company owned by Mr. Fusco held the other 50% ownership interest in Freedom First, a Connecticut limited liability company that commenced operations on January 1, 2004. On April 18, 2005, a Membership Interest Transfer Agreement was executed between Anthony Fusco and Messrs. Connelly and Torkelson. Consequently, Messrs. Connelly and Torkelson became the equal owners of NDS and Anthony Fusco became the owner of Freedom First.

Homeland and Financial Liberty paid commissions to Freedom First totaling approximately \$432,000 between January 1, 2004 and April 17, 2005, the period in which Messrs. Connelly and Torkelson together held a 50% ownership interest, and approximately \$253,000 between April 18, 2005 and June 30, 2006, the period in which Mr. Fusco was the owner.

Homeland and Financial Liberty paid commissions to NDS of approximately \$13,000 between May 20, 2004 and April 17, 2005, the period in which Mr. Fusco was the sole owner, and approximately \$88,000 between April 18, 2005 and June 30, 2006, the period in which Messrs. Connelly and Torkelson were the equal owners.

Between April 18, 2005 and June 30, 2006, NDS made contract fee payments totaling \$9,307.12 to Dennis Connelly and Wade Torkelson.

The operating expenses of NDS were paid by NSS. As of June 30, 2006, the amount due from NDS to NSS was \$91,569.13.

USA Debt Co., LLC (USA Debt)

USA Debt is a Wyoming limited liability company formed in December 2004 and equally owned by Anthony Fusco and Sophia Licon. On January 1, 2005 Sophia Licon signed a support services agreement with Financial Liberty. Between March 4, 2005 and January 27, 2006, Financial Liberty paid commissions to USA Debt totaling approximately \$34,000. The Temporary Receiver inspected the premises of USA Debt in Pomona CA., and confirmed it operated as a sales office using the name Care First Financial. USA Debt assigns new customers to Capital Support Services, LLC, (Capital Support), which operates in New Jersey (with one employee in the Pomona office of USA Debt). Capital Support provides all customer support and debt negotiation services. Since the inception of the temporary receivership, USA Debt has stopped all sales activity. Capital Support is continuing with customer support and debt negotiation services. The Temporary Receiver is gathering additional data about the operations of USA Debt.

United Debt Recovery, LLC (United)

As discussed previously, Monique Farinha and Kelli Rundle together held a 10% ownership interest in Homeland at its inception. On July 27, 2004, Monique Farinha, Kelli Rundle, and United, a Nevada limited liability company equally owned by Monique Farinha and Kelli Rundle, entered into a General Release and an Asset Purchase Agreement with Homeland. In exchange for Farinha and Rundle releasing their ownership interests in Homeland, United acquired from Homeland its in-house sales office with a sales force of about 12 people and certain office equipment. In addition, on August 23, 2004, United sublet the office space at 2151 Michelson Drive in Irvine from Homeland.

United borrowed its operating funds from Homeland, Financial Liberty, and NSS. Homeland wrote off its receivables due from United of \$292,029.59 at December 31, 2004, while Financial Liberty and NSS still carry on their books receivables due from United in the amounts of approximately \$124,000 and \$8,500, respectively.

United ceased its operations around February 2005. Homeland and Financial Liberty paid commissions to United, through offsetting inter-company debts, totaling approximately \$723,000 between August 19, 2004 and June 30, 2006.

Summary of Fees Received from Consumers

Under Tab 2 is a summary of fees received from consumers, commissions paid, and payments to certain defendants. The summary indicates that between November 15, 2001 (inception of Homeland) and June 30, 2006, the group of companies equally owned by Messrs. Connelly and Torkelson received fees from consumers totaling approximately \$41.4 million, of which approximately \$12.6 million was paid as commissions to debt settlement promotion companies. Approximately \$9.6 million from the \$41.4 fees paid by consumers

was paid to or for the benefit of Dennis Connelly, Wade Torkelson and companies owned by either of them.

Of the \$12.6 million total commission payments, approximately \$3.6 million was paid to Prosper, approximately \$432,000 was paid to Freedom First before April 18, 2005 when it was owned by Messrs. Connelly and Torkelson, approximately \$88,000 was paid to NDS after April 18, 2005 when it was owned by Messrs. Connelly and Torkelson, and approximately \$723,000 was paid to United.

The \$9.6 million total payments to or for the benefit of Dennis Connelly, Wade Torkelson and companies owned by either of them were made in the form of salary, employee advances, various fees, and payment of American Express credit card charges.

During the period from November 15, 2001 through September 30, 2005 the GoldMine data shows that the group of companies equally owned by Messrs. Connelly and Torkelson or associated with them (not including Prosper) accepted for negotiation 90,912 debts totaling \$463 million. The data also shows that during the same period, 11,916 debts with original balances totaling \$55.9 million were settled or completed for \$32.9 million. The settlements averaged 58.9% of the original balances indicating the entire consumer benefit was \$23.0 million before taxes for discharge of indebtedness, compared to the \$36.4 million paid by all consumers (excluding consumers enrolled through Prosper) for fees.

The settled debt balance of \$55.9 million was 12.1% of the \$463 million debts turned over for negotiation. During the same period, the GoldMine database shows that consumers cancelled negotiation services for debts totaling \$337.6 million, or 72.9% of the \$463 million turned-over debts.

THE MONITORED ENTITY

Nationwide Support Services, Inc. (Nationwide)

Nationwide is a California corporation formed on May 6, 2005 and equally owned by Joanne Garneau and her spouse, Art Garneau. It commenced its operations on October 1, 2005 and began to collect service fees from consumers under the support services agreements with Prosper Financial Solutions, Debt Management Systems (a third-party company in Florida), and Help With Debt (a third-part company located in New Hampshire), all of which had been purchased from Financial Liberty as mentioned previously. Nationwide also received fees from consumers solicited by SDS West and Solve Debts, companies located in California. Nationwide secured the additional business through the efforts of its owner and its Chief Operating Officer.

Between October 1, 2005 and December 31, 2005, the fees received by Nationwide from consumers were processed by NoteWorld but through the bank account of Financial

Liberty, as there was no servicing agreement between NoteWorld and Nationwide prior to January 1, 2006. The servicing agreement between NoteWorld and Nationwide became effective January 1, 2006 for all fees paid by consumers who enrolled into the debt settlement programs after January 1, 2006. The commission portions of the fees were ACH credited to the bank accounts of the five debt settlement promotion companies (see previous paragraph) including Prosper.

The remaining fees, and the \$7.50 NoteWorld processing fee paid by each consumer each month and the \$5.00 monthly banking fee paid by each consumer each month, was ACH credited to accounts for the benefit of Nationwide. The \$7.50 NoteWorld processing fee was subsequently ACH debited back to NoteWorld and the \$5.00 banking fee was subsequently transferred first to a Financial Liberty bank account and ultimately paid evenly to Messrs. Connelly and Torkelson, as called for under the October 17, 2005 Purchase Agreement between Nationwide and Financial Liberty.

The service fee charged by Nationwide is computed at 15% of the total debt outstanding at the enrollment of the debt settlement program. About 35% to 40% of the fee is to be paid in the first three months. The amount of the monthly payment factors in total debt, the expected final settlement amount (set at 53% of total debts), the amount of the service fee, and the settlement period (ranging from 36 months to 45 months depending on the magnitude of the expected final settlement amount). The remainder of the service fee, after the first three months, is to be paid as part of the next 12 monthly installments.

For example, if the total debt is \$20,000, then the service fee is \$3,000 ($\$20,000 \times 15\%$). The expected final settlement amount is \$10,600 ($\$20,000 \times 53\%$ settlement rate). The total amount to be paid by a consumer in a 36-month settlement period = $\$10,600 + \$3,000 = \$13,600$. The monthly payment for 36 months is \$377 ($\$13,600$ divided by 36).

In summary, if a consumer enrolled into the program with debts totaling \$20,000, he or she would pay \$389.50 a month ($\$377 + \7.50 NoteWorld processing fee + $\$5.00$ Nationwide banking fee) for 36 months. Payments would be applied as follows:

- Payments for the first three months totaling \$1,168.50 would be applied entirely to service fee.
- Payments for the subsequent 4th to 15th months total \$4,674, of which \$2,010 would be applied to service fee and \$2,664 (25% of the total settlement payment) would be reserved for settlement payments.
- Payments for the subsequent 16th to 36th months total \$8,179.50, of which \$262.50 would be applied to service fee and \$7,917 (75% of the total settlement payment) would be reserved for settlement payments.

In general, when the reserved settlement payments reached 40% to 53% of the smallest debt amount among all debts, negotiation for settlement with the creditor occurred.

Operations of Nationwide

Joanne Garneau told the Monitor that she decided to purchase the servicing rights from Financial Liberty, and take over all debt negotiation services, primarily because of service issues. Ms. Garneau said Financial Liberty provided an inferior level of customer service and an inconsistent and inefficient debt negotiation process. Employees meeting with the Monitor confirmed the evaluation of service provided by Financial Liberty.

Nationwide, through Headlands and Innovative Staffing Resources, a non-related third party, employs between 37 and 42 staff members, including a Chief Operating Officer and a Director of Client Services.

The customer service section includes a supervisor and 10 to 12 representatives. This section completes the welcome and follow-up calls to the customers, answers inbound questions, and transfers callers to debt negotiators when necessary. New employees receive classroom training and refer to and follow a detailed manual. The manual covers procedures, elements of debt mediation, how to complete entries to the GoldMine database and the NoteWorld program, and a script to follow for going over the welcome packet with new customers. The software system sets follow-up dates for the initial and periodic calls by the representatives and produces a list of past due action dates. A recent printout of follow-up dates showed that none was past due.

The debt negotiation section includes a supervisor and 10 to 12 debt mediators. This section is responsible for setting a debt negotiation strategy with the customers and reviewing each customer's debt situation and mediation progress every 30 days. New employees receive classroom training, refer to and follow a detailed manual, and work alongside an experienced mediator for a few days. The manual covers how to complete a debt negotiation strategy and steps for the 30-day review. The software system sets follow-up dates for the strategy session and the 30-day reviews, and produces a list of past due action dates. A recent printout of follow dates showed the experienced negotiators were current and only new negotiators under training had delinquent follow-up dates.

Currently, the debt negotiators are limited to 450 customers, who usually have about 2,500 to 3,000 debts. The debt negotiation supervisor believes that limit may need to be reduced to 1,500 to 2,000 debts in the future when customers have accumulated more funds for settlement. The settlement target is about 60 settled debts per negotiator per month.

The balance of the staff is spread between two more experienced customer representatives that help customers respond to or deal with legal issues, 11 to 12 staff for database entry and record keeping, and two information technology staff members.

Activity and Results

The Monitor has reviewed data from the GoldMine database and focused on activity, including sign-ups, negotiations, cancellations, and other activity, for the period January 1, 2006 through August 10, 2006. Whenever possible, the Monitor has attempted to compare and confirm data with reports from NoteWorld and reports prepared and furnished by Nationwide management.

The GoldMine data shows that Nationwide has signed up or accepted 19,088 debts totaling \$123.7 million from 2,647 consumers since January 1, 2006. As of August 10, 2006, 85% of the debts by number and dollar amount remain classified as active. Debts totaling \$11.9 million, or 9.6% of the total accepted, are classified as cancelled, with another \$2.0 million (1.6%) pending cancellation. The cancellation percentage data by debt matches the cancellation data by number of customers furnished by management. The cancellation ratio is well below the 72.9% reported for the Receivership Defendants excluding Prosper, and the 38.4% for consumers enrolled through Prosper. Nationwide has attempted to address prior service and negotiation complaints and issues, and improve practices and procedures. However, cancellation rates and activity need to be confirmed with a longer history before completing a final evaluation and confirmation of the current indicated cancellation rate of 11.2%.

Settlement activity for the 19,088 debts signed up in 2006 is meager, with 364 debts totaling \$646,313, or about one-half of one percent (.522%) of the original debt amount. There has also been settlement activity on older debt that totals \$7.5 million, which is discussed below.

Nationwide Sign Up and Settlement Activity and Current Consumer Status

SIGN UP ACTIVITY			SETTLEMENT ACTIVITY RELATED TO SIGN UPS			
Sign-Up Date	Total # of Debts	Original Debt Amount	Approximate Settlement Date	Total # of Debts	Settlement by \$ Amount	% of Original Debt
1/1/2006	2,301	\$ 14,616,259.22	Jan-06	NA	NA	NA
2/1/2006	2,655	17,181,110.89	Feb-06	1	\$ 1,300.00	0.008%
3/1/2006	2,955	19,034,101.87	Mar-06	5	12,810.70	0.067%
4/1/2006	2,397	14,500,617.19	Apr-06	9	29,485.44	0.203%
5/1/2006	2,441	15,844,439.91	May-06	17	80,781.06	0.510%
6/1/2006	2,593	18,158,861.63	Jun-06	5	4,388.20	0.024%
7/1/2006	2,313	15,573,820.78	Jul-06	20	71,011.60	0.456%
8/1/2006	1,433	8,794,170.91	Aug-06	307	446,536.19	5.078%
	<u>19,088</u>	<u>\$123,703,382.40</u>		<u>364</u>	<u>\$646,313.19</u>	<u>0.522%</u>

Consumer Status	Total # of Debts	% By #	Original Debt Amount	% By \$
Abandoned	210	1.10%	\$ 1,263,478.62	1.02%
Active	16,231	85.03%	105,995,388.32	85.69%
Cancelled	1,616	8.47%	11,913,364.46	9.63%
Hold	98	0.51%	655,076.05	0.53%
Pending Cancellation	359	1.88%	2,019,101.35	1.63%
Settled	362	1.90%	646,313.19	0.52%
Completed *	2	0.01%	11,898.56	0.01%
Suspend	210	1.10%	1,198,761.86	0.97%
	<u>19,088</u>	<u>100.00%</u>	<u>\$123,703,382.40</u>	<u>100.00%</u>

(*Completed means the number of consumers that have settled all of their debts.)

Activity on Pre-January Debts

In addition to the 19,088 debts signed up since January 2006, Nationwide also administers active debts that existed prior to January 1, 2006 from some Receivership Defendants, affiliated entities, and Nationwide. From these prior enrollments, there are an additional 14,787 debts totaling \$75.3 million that belong to about 1,700 customers. During the period from January 1, 2006 through August 10, 2006, the GoldMine database shows total settlements of 1,952 debts with original balances totaling \$7.5 million. The settlements include 364 debt balances totaling \$646,313 settled for Nationwide's 2006 customers. This total does not include settlements of \$1.3 million made directly by customers.

Comments about Nationwide Settlement Activity

The Monitor has observed the operations and procedures in the customer service and debt negotiation areas. The manuals, training, and operating procedures appear to be functioning as designed and the current level of service seems to meet the company-designed goals and requirements. As noted, the number and amount of debt settlements on the customers signed up since January 2006 is meager. Company officers and employees point out that consumers have been accumulating settlement funds only for the past four months, and are just beginning to have sufficient funds available to negotiate one or more debts.

A list prepared August 20, 2006 from the GoldMine database has 249 customers that have deposited at least \$1,500 with NoteWorld and such amount represents at least 40% of the balance of one of the consumer's debts. This is the dollar amount and ratio that company officers and employees say is needed to effectively begin and settle a debt negotiation. Another 175 customers have saved between \$1,000 and \$1,500 and should be at the required level within a few months. The negotiators are contacting creditors of the customers with funds available. The negotiation supervisor closely monitors this list.

Comments and Observations about Potential Operational Problems and Staffing Issues

Provided Nationwide follows its own developed policies and procedures, and continues to manage the activities of its debt negotiators, the number and percentage of debt settlements should increase substantially over the next year. However, Nationwide will need to evaluate whether 450 customers for each negotiator is too many, especially as available settlement funds increase. It is apparent that presently the negotiators are focusing on settling the enrollments prior to January 2006. As settlement funds increase each month, a greater number of the 16,231 active debts enrolled after January 1, 2006 will be ready for negotiation and settlement.

Additionally, and most important, with about 2,500 new debts assigned each month, and about 600 (assuming the goal is reached) debts settled each month, Nationwide will continue to experience an *exponential* growth of customers and assigned debts. Using the company's workload calculations, Nationwide will need to locate, hire and train at least one additional debt negotiator each month for the increased volume of assigned debts, plus additional negotiators to replace turnover, and to accommodate increased activity as available settlement funds increase. Considering all possible increased negotiating requirements, Nationwide could need two or three new debt negotiators each month. As the number of customers grows, Nationwide will also need an increased number of customer service representatives.

If appropriate staff levels are not maintained, the rate and volume of debt settlements and the quality and effectiveness of the customer service staff will be far below what the debt service sales entities promised to the consumers, and what Nationwide has committed to complete.

Comments and Observations about Potential Financial Shortfalls and Financial Issues

The Monitor believes the current schedule of collecting fees compared to Nationwide's commitment to complete debt negotiations and settlements is creating an unsupportable and risky financial imbalance. Nationwide must evaluate the financial impact of its commitment to continue staff expense for debt negotiation and settlement for an additional 21 to 24 months (or longer) after the consumer fees are fully paid during the first 15 months. Based on the Nationwide's expected rate of accumulated settlement funds, 75% of the consumers' five or six debts will not be negotiated and settled until after the first 15 months.

Without new customers, it is difficult to project how the current customers will have their debts settled after the fees are fully collected within 15 months. However, it is not financially sound to use fees from *new* customers to pay the expense of debt negotiation for the *prior, fully paid* customers. Such a practice will create a critical financial liability and may cause Nationwide to be unable to complete the negotiations and settlements to which it has

committed. As of June 30, 2006, with more than 75% of the debt negotiations and settlements not completed, the cash balance of Nationwide was approximately \$161,000. It appears, based on the current financial condition, that fees from future customers must provide much of the funds to pay the future expenses required for the current 2,500 customers.

The Monitor recommends that Nationwide complete its own evaluation of its fee collection arrangement and prepare an alternate fee collection schedule that matches fee payments more closely with the actual staff expense for the entire negotiation and debt settlement process.

Summary of Fees Received from Consumers

Under Tab 3 is a summary of fees received from consumers and certain payments. The summary indicates that between October 1, 2005 and June 30, 2006, in addition to the \$60,000 services fees received from NSS, Nationwide received fees from consumers totaling approximately \$5.0 million. From those receipts, approximately \$2.7 million was paid as commissions, approximately \$602,000 was paid to Headlands, \$254,000 was paid to Marbrisa Equities, LLC, and approximately \$17,000 was paid to Joanne and Art Garneau for expense reimbursements. Additionally, \$503,000 was paid to Financial Liberty as principal-only payments on the \$1,560,000 promissory note, and \$44,000 was paid to NSS to purchase certain office equipment and office supplies.

Of the \$2.7 million commissions paid, approximately \$565,000 was paid to Prosper and \$2.1 million was paid to four other unrelated companies.

As discussed above, on December 24, 2005 Headlands hired part of the workforce of NSS. The \$602,000 payment from Nationwide to Headlands was to pay the staffing cost.

Marbrisa Equities, LLC (Marbrisa) is a company 99% owned by Garneau Family Trust. The \$254,000 payment to Marbrisa was recorded by Nationwide as management service expenses.

For the \$1,560,000 promissory note due from Nationwide to Financial Liberty as described previously, all payments made by Nationwide were applied as principal reductions only. In addition to the \$503,000 payment as of June 30, 2006, Nationwide also made additional payments of \$240,563 as of August 1, 2006.

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CERTAIN NON-DEFENDANT COMPANIES CONNECTED TO DENNIS CONNELLY AND WADE TORKELSON

Citi Trust Mortgage, LLC (CTM)

Dennis Connelly and Wade Torkelson were planning to engage in the reverse mortgage business by selling the names of the qualified applicants to the fund providers for a fee. Consequently, they formed a Delaware company, Citi Trust Mortgage, LLC, on December 9, 2005. Since the reverse mortgage business requires a real estate license, Mr. Sean O’Sullivan was also involved.

In January and March of 2004, Mr. Torkelson and Mr. Connelly each paid \$124,000 into CTM’s bank account. The signatories of the bank account were Wade Torkelson and Donna Green, the sister of Mr. Connelly.

The state of California denied CTM’s foreign-corporation registration application due to the word “Trust” used in CTM and CTM never became operative.

Federal Reverse Mortgage, Inc. (FRM)

Federal Reverse Mortgage, Inc. was formed on May 17, 2006 in Delaware and it was approved as a foreign corporation in California. FRM has an account at Wells Fargo Bank, previously with three authorized signers, Dennis Connelly, Wade Torkelson and Donna Green, a sister of Dennis Connelly. Wells Fargo Bank informed the Receiver’s office that on August 10, 2006, Dennis Connelly went to the branch office to remove Wade Torkelson and himself as authorized signers, leaving Donna Green as the sole authorized signer on the account.

As shown in the detail below, Wade Torkelson purchased a Cashier’s Check for \$63,500 at 2:40 p.m. and Donna Green (now apparently the sole authorized signer) withdrew \$5,000 cash at 3:22 p.m.

On August 4, 2006, \$233,817.94 was transferred, through an official check, from CTM’s bank account to FRM’s Wells Fargo account. Operations of FRM have not yet commenced.

POST-RECEIVERSHIP WITHDRAWALS FROM CERTAIN RECEIVERSHIP DEFENDANTS & RELATED ENTITIES

The table below lists withdrawals from bank accounts after this Court issued the Temporary Restraining Order. In addition to these withdrawals, Wade Torkelson⁴, withdrew \$160,606 from his company, TLT Development.

⁴ Mr. Torkelson’s assets were not frozen until August 11th at 5:30 p.m.

Payee	Date	Time	Amount	Bank	Remitter	Purchaser Signer
Ryan Connelly	08/10/06	12:46 PM	\$ 15,000.00	Cal Bank & Trust	Financial Liberty	Dennis Connelly
Diane Paoletti	08/10/06	12:46 PM	8,500.00	Cal Bank & Trust	Dennis Connelly	Dennis Connelly
Kelli Rundle	08/10/06	12:46 PM	25,600.00	Cal Bank & Trust	Dennis Connelly	Dennis Connelly
Myrna Diamond	08/10/06	12:46 PM	58,200.00	Cal Bank & Trust	Financial Liberty	Dennis Connelly
Cash	08/10/06	1:02 PM	9,976.00	Cal Bank & Trust	Financial Liberty	Dennis Connelly
Engine Ready	08/10/06	1:03 PM	50,000.00	Cal Bank & Trust	Financial Liberty	Richard Wade Torkelson
Monique Farinha	08/10/06	1:05 PM	48,000.00	Cal Bank & Trust	Financial Liberty	Richard Wade Torkelson
Web Creators	08/10/06	2:40 PM	63,500.00	Wells Fargo Bank	Federal Reverse Mortgage Inc.	Richard Wade Torkelson
Cash	08/10/06	3:22 PM	5,000.00	Wells Fargo Bank	Federal Reverse Mortgage Inc.	Donna Green (1)
Wells Fargo	08/11/06	9:31 AM	49,183.85	Cal Bank & Trust	Financial Liberty	Richard Wade Torkelson (2)
Dean Steward	08/11/06	3:21 PM	100,000.00	Wells Fargo Bank	Federal Reverse Mortgage Inc.	Donna Green (1)
Dean Steward	09/11/06		(100,000.00)	Wells Fargo Bank	Federal Reverse Mortgage Inc.	Donna Green (3)
Scott Austin	08/11/06	3:21 PM	46,500.00	Wells Fargo Bank	Federal Reverse Mortgage Inc.	Donna Green (1)
Apple Store	08/13/06	5:02 PM	<u>4,000.00</u>	Bank of America	TLT Development	Richard Wade Torkelson
Total			<u>\$ 383,459.85</u>			

(1) Dennis Connelly's sister

(2) Funds used to pay off auto loan for Dennis Connelly per bank officer.

(3) Dennis Connelly took the Cashier's Check back to Wells Fargo and deposited back to the account on 9/11/06

Respectfully submitted,

/s/

Robb Evans & Robb Evans & Associates LLC
Temporary Receiver & Monitor

TAB 1

**ROBINA CAPITAL INC.
 dba PROSPER FINANCIAL SOLUTIONS AND EQUALLY OWNED BY JOANNE GARNEAU
 AND ART GARNEAU
 (Under Temporary Receivership of Robb Evans and Robb Evans & Associates LLC)
 AND JOANNE GARNEAU dba PROSPER FINANCIAL SOLUTIONS (for Certain Commission
 Income and Expenses Only)**

**SUMMARY OF CASH RECEIPTS AND CASH DISBURSEMENTS
 PERIOD FROM SEPTEMBER 20, 2002 (COMMENCEMENT OF OPERATIONS OF PROSPER FINANCIAL SOLUTIONS AS A
 SOLE PROPRIETORSHIP) TO JUNE 30, 2006**

	Period From Sep. 20, 2002 to Note Dec. 31, 2002	2003	2004	2005	2006 Jun. 30, 2006	Total
CASH RECEIPTS:						
Commissions received from affiliated companies:						
Homeland Financial Services, Inc.	1 \$ 38,814.31	\$ 950,800.75	\$ 1,078,543.79	\$ 208,540.30	\$ 294.00	\$ 2,276,993.15
Financial Liberty Services, LLC	-	-	121,993.79	962,279.55	256,373.82	1,340,647.16
Nationwide Support Services, LLC	-	-	-	71,424.70	494,010.37	565,435.07
Subtotal, commissions received from affiliated companies	<u>38,814.31</u>	<u>950,800.75</u>	<u>1,200,537.58</u>	<u>1,242,244.55</u>	<u>750,678.19</u>	<u>4,183,075.38</u>
Rent reimbursements received from affiliated companies:						
Headlands Resources, Inc.	-	-	21,699.60	28,325.00	27,350.00	77,374.60
fx N Stuff	-	-	2,400.00	2,400.00	-	4,800.00
Subtotal, rent reimbursements received from affiliated companies	<u>-</u>	<u>-</u>	<u>24,099.60</u>	<u>30,725.00</u>	<u>27,350.00</u>	<u>82,174.60</u>
Others	-	28,476.16	6,068.99	8,613.25	5,310.50	48,468.90
TOTAL CASH RECEIPTS	<u>\$ 38,814.31</u>	<u>\$ 979,276.91</u>	<u>\$ 1,230,706.17</u>	<u>\$ 1,281,582.80</u>	<u>\$ 783,338.69</u>	<u>\$ 4,313,718.88</u>

**ROBINA CAPITAL INC.
 dba PROSPER FINANCIAL SOLUTIONS AND EQUALLY OWNED BY JOANNE GARNEAU
 AND ART GARNEAU
 (Under Temporary Receivership of Robb Evans and Robb Evans & Associates LLC)
 AND JOANNE GARNEAU dba PROSPER FINANCIAL SOLUTIONS (for Certain Commission
 Income and Expenses Only)**

**SUMMARY OF CASH RECEIPTS AND CASH DISBURSEMENTS
 PERIOD FROM SEPTEMBER 20, 2002 (COMMENCEMENT OF OPERATIONS OF PROSPER FINANCIAL SOLUTIONS AS A
 SOLE PROPRIETORSHIP) TO JUNE 30, 2006**

		Period From Sep. 20, 2002 to Note Dec. 31, 2002	2003	2004	2005	Period From Jan. 1, 2006 to Jun. 30, 2006	Total
CASH DISBURSEMENTS:							
Payments to affiliated companies:							
Headlands Resources, Inc.	1	\$ -	\$ (176,479.54)	\$ (466,852.64)	\$ (652,605.00)	\$ (368,331.12)	\$ (1,664,268.30)
De Palma Regency Inc.		-	-	(340,825.48)	(429,342.75)	(217,229.32)	(987,397.55)
fx N Stuff		-	(42,000.00)	(10,250.00)	-	-	(52,250.00)
Marbrisa Equities, LLC		-	-	(10,000.00)	-	(30,000.00)	(40,000.00)
Financial Liberty Services, LLC	1	-	-	(3,719.12)	-	-	(3,719.12)
Subtotal, payments to affiliated companies		-	(218,479.54)	(831,647.24)	(1,081,947.75)	(615,560.44)	(2,747,634.97)
In-house sales commissions		-	(243,639.91)	(171,410.11)	(63,284.75)	(56,976.99)	(535,311.76)
Insurance premium payments for the benefit of Joanne Garneau		-	(4,614.69)	(9,385.24)	(9,677.16)	(1,424.92)	(25,102.01)
Others	1	(38,814.31)	(468,061.14)	(217,806.74)	(98,936.09)	(63,159.68)	(886,777.96)
TOTAL CASH DISBURSEMENTS		<u>\$ (38,814.31)</u>	<u>\$ (934,795.28)</u>	<u>\$ (1,230,249.33)</u>	<u>\$ (1,253,845.75)</u>	<u>\$ (737,122.03)</u>	<u>\$ (4,194,826.70)</u>

Note 1:

Joanne Garneau was operating her business also under the name of Prosper Financial Solutions, which received commissions of \$322,248.98 from Homeland Financial Services, Inc. (Homeland) between September 20, 2002 and May 15, 2004. For the purpose of reporting all commission income

**ROBINA CAPITAL INC.
 dba PROSPER FINANCIAL SOLUTIONS AND EQUALLY OWNED BY JOANNE GARNEAU
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 Income and Expenses Only)**

**SUMMARY OF CASH RECEIPTS AND CASH DISBURSEMENTS
 PERIOD FROM SEPTEMBER 20, 2002 (COMMENCEMENT OF OPERATIONS OF PROSPER FINANCIAL SOLUTIONS AS A
 SOLE PROPRIETORSHIP) TO JUNE 30, 2006**

Period From	Period From	Total
Sep. 20, 2002	Jan. 1, 2006	
to	to	
Note Dec. 31, 2002	Jun. 30, 2006	
2003	2005	
2004	2006	

received from Homeland by Prosper Financial Solutions, the \$322,248.98 income and the related expenses are included together with those of Robina Capital Inc., also doing business under the name of Prosper Financial Solutions with the initial receipt of commission income from Homeland on May 1, 2003.

TAB 2

**A GROUP OF COMPANIES EQUALLY OWNED BY TWO INDIVIDUAL DEFENDANTS, DENNIS CONNELLY AND WADE TOR KELSON
(Under Temporary Receivership of Robb Evans and Robb Evans & Associates LLC)**

**SUMMARY OF FEES RECEIVED FROM CONSUMERS, COMMISSIONS PAID, AND PAYMENTS TO CERTAIN DEFENDANTS
PERIOD FROM NOVEMBER 15, 2001 TO JUNE 30, 2006**

	Homeland Financial Services, Inc. (11/15/01 to 06/30/06)	Financial Liberty Services, LLC (08/01/04 to 06/30/06)	National Support Services, LLC (08/01/04 to 06/30/06) (Note 1)	Nationwide Debt Services, LLC (04/18/05 to 06/30/06) (Note 2)	Total (11/15/01 to 06/30/06)
Fees Received from Consumers:					
11/15/01 to 12/31/01	\$ 1,321.20	\$ -	\$ -	\$ -	\$ 1,321.20
2002	1,158,956.96	-	-	-	1,158,956.96
2003	10,975,736.01	-	-	-	10,975,736.01
2004	14,083,783.66	2,283,004.50	-	-	16,366,788.16
2005	2,390,261.86	8,993,649.38	-	-	11,383,911.24
01/01/06 to 06/30/06	<u>5,505.43</u>	<u>1,472,396.72</u>	<u>-</u>	<u>-</u>	<u>1,477,902.15</u>
Total fees received from consumers	<u>\$28,615,565.12</u>	<u>\$ 12,749,050.60</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 41,364,615.72</u>
Commissions Paid during the Period:					
Prosper Financial Solutions (Note 3)	\$ (2,276,993.15)	\$ (1,340,647.16)	\$ -	\$ -	\$ (3,617,640.31)
United Debt Recovery, LLC (Note 4)	(27,500.00)	(695,402.47)	-	-	(722,902.47)
Freedom First Financial, LLC (Note 2)	(155,157.03)	(529,914.05)	-	-	(685,071.08)
Nationwide Debt Services, LLC (Note 2)	(12,911.50)	(88,168.73)	-	-	(101,080.23)
Other debt settlement companies and individual sales representatives	<u>(5,083,421.62)</u>	<u>(2,376,995.95)</u>	<u>-</u>	<u>-</u>	<u>(7,460,417.57)</u>
Total commissions paid during the period	<u>\$ (7,555,983.30)</u>	<u>\$ (5,031,128.36)</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ (12,587,111.66)</u>

A GROUP OF COMPANIES EQUALLY OWNED BY TWO INDIVIDUAL DEFENDANTS, DENNIS CONNELLY AND WADE TORKELESON (Under Temporary Receivership of Robb Evans and Robb Evans & Associates LLC)

**SUMMARY OF FEES RECEIVED FROM CONSUMERS, COMMISSIONS PAID, AND PAYMENTS TO CERTAIN DEFENDANTS
PERIOD FROM NOVEMBER 15, 2001 TO JUNE 30, 2006**

	Homeland Financial Services, Inc. (11/15/01 to 06/30/06)	Financial Liberty Services, LLC (08/01/04 to 06/30/06)	National Support Services, LLC (08/01/04 to 06/30/06) (Note 1)	Nationwide Debt Services, LLC (04/18/05 to 06/30/06) (Note 2)	Total (11/15/01 to 06/30/06)
Payments during the Period to Two Individual Defen- dants and Compa- nies Owned by Either of Them in the Forms of Salary, Various Fees and Advances:					
Dennis Connelly and his companies (Note 5)	\$ (3,296,074.80)	\$ (1,709,013.43)	\$ (418,239.35)	\$ (4,653.56)	\$ (5,427,981.14)
Wade Torkelson and his company (Note 6)	<u>(2,136,063.32)</u>	<u>(1,617,253.81)</u>	<u>(375,913.46)</u>	<u>(4,653.56)</u>	<u>(4,133,884.15)</u>
Total payments to Dennis Connelly, Wade Torkel- son and companies owned by either of them	<u>\$ (5,432,138.12)</u>	<u>\$ (3,326,267.24)</u>	<u>\$ (794,152.81)</u>	<u>\$ (9,307.12)</u>	<u>\$ (9,561,865.29)</u>

Notes:

1. National Support Services, LLC is the wholly-owned subsidiary of Financial Liberty Services, LLC.
2. Before April 18, 2005, Nationwide Debt Services, LLC (NDS) was wholly-owned by Anthony Fusco, while Freedom First Financial, LLC (Freedom First) was 50% owned by Dennis Connelly and Wade Torkelson together and 50% owned by a company of Anthony Fusco. On April 18, 2005, a Membership Interest Transfer Agreement was executed between Anthony Fusco and Messrs. Connelly and Torkelson and consequently, Messrs. Connelly and Torkelson became the equal owners of NDS and Anthony Fusco became the ultimate owner of Freedom First.

Of the \$685,071.08 commissions paid to Freedom First by Homeland Financial Services, Inc. (Homeland) and Financial Liberty Services, LLC (Financial Liberty), \$431,950.46 was paid between January 1, 2004 and April 17, 2005, the period in which Messrs. Connelly and Torkelson together held a 50% ownership interest, and \$253,120.62 was paid between April 18, 2005 and June 30, 2006, the period in which Mr. Fusco was the ultimate owner.

A GROUP OF COMPANIES EQUALLY OWNED BY TWO INDIVIDUAL DEFENDANTS, DENNIS CONNELLY AND WADE TORKELSON (Under Temporary Receivership of Robb Evans and Robb Evans & Associates LLC)

**SUMMARY OF FEES RECEIVED FROM CONSUMERS, COMMISSIONS PAID, AND PAYMENTS TO CERTAIN DEFENDANTS
PERIOD FROM NOVEMBER 15, 2001 TO JUNE 30, 2006**

Homeland Financial Services, Inc. (11/15/01 to 06/30/06)	Financial Liberty Services, LLC (08/01/04 to 06/30/06)	National Support Services, LLC (08/01/04 to 06/30/06) (Note 1)	Nationwide Debt Services, LLC (04/18/05 to 06/30/06) (Note 2)	Total (11/15/01 to 06/30/06)
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Of the \$101,080.23 commissions paid to NDS by Homeland and Financial Liberty, \$12,911.50 was paid between May 20, 2004 and April 17, 2005, the period in which Mr. Fusco was the sole owner, and \$88,168.73 was paid between April 18, 2005 and June 30, 2006, the period in which Messrs. Connelly and Torkelson were the equal owners.

- Prosper Financial Solutions is the business name used under the operations of both Joanne Garneau as a sole proprietor, and Robina Capital Inc., a company equally owned by Joanne Garneau, mother of Wade Torkelson, and her spouse, Art Garneau.

Of the \$3,617,640.31 commissions paid to Prosper Financial Solutions by Homeland and Financial Liberty, \$322,248.98 was paid to Joanne Garneau as a sole proprietor and \$3,295,391.33 was paid to Robina Capital Inc.

- Monique Farinha, ex-spouse of Wade Torkelson, and Kelli Rundle released their 10% ownership interests in Homeland on July 27, 2004 and became the owners of United Debt Recovery, LLC, which took over the in-house sales force of Homeland. United Debt Recovery, LLC ceased its operations in February 2005.
- See Exhibit 1 for detail.
- See Exhibit 2 for detail.

A GROUP OF COMPANIES EQUALLY OWNED BY DENNIS CONNELLY AND WADE TORKELSON

**SUMMARY OF PAYMENTS TO DENNIS CONNELLY
PERIOD FROM JANUARY 1, 2002 TO JUNE 30, 2006**

Periods	Homeland Financial Service, Inc.			Financial Liberty Services, LLC			National Support Services, LLC		Nationwide Debt Services, LLC		Total
	Dennis Connelly	DK Ventures	Adman Investments	Dennis Connelly	DK Ventures	Adman Investments	Dennis Connelly	Dennis Connelly	Dennis Connelly	Dennis Connelly	
Year 2002	\$ 41,348.52	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 41,348.52
Year 2003	255,716.95	351,000.00	-	-	-	-	-	-	-	-	606,716.95
Year 2004	851,516.83	1,142,000.00	85,000.00	-	178,262.31	567,117.31	-	-	-	-	2,823,896.45
Year 2005	-	-	529,000.00	6,860.00	7,692.31	577,500.00	315,738.47	-	-	-	1,436,790.78
01/01/06 to 06/30/06	-	-	40,492.50	123,600.00	-	247,981.50	102,500.88	4,653.56	4,653.56	4,653.56	519,228.44
Total	\$ 1,148,582.30	\$ 1,493,000.00	\$ 654,492.50	\$ 130,460.00	\$ 185,954.62	\$ 1,392,598.81	\$ 418,239.35	\$ 418,239.35	\$ 4,653.56	\$ 4,653.56	\$ 5,427,981.14
Year 2002:											
Salary, W-2	\$ 28,700.00										
Various fees	12,648.52										
	<u>\$ 41,348.52</u>										
Year 2003:											
Salary, W-2	\$ 85,940.63										
Various fees	169,776.32	\$ 351,000.00									
	<u>\$ 255,716.95</u>	<u>\$ 351,000.00</u>									
Year 2004:											
Salary, W-2	\$ 99,692.33										
Advances	15,000.00										
Various fees	719,000.00	\$ 1,142,000.00	\$ 85,000.00								
AMEX	17,824.50	-	-								
	<u>\$ 851,516.83</u>	<u>\$ 1,142,000.00</u>	<u>\$ 85,000.00</u>								
						\$ 178,262.31	\$ 567,117.31				
						<u>\$ 178,262.31</u>	<u>\$ 567,117.31</u>				

A GROUP OF COMPANIES EQUALLY OWNED BY DENNIS CONNELLY AND WADE TORKELSON

**SUMMARY OF PAYMENTS TO WADE TORKELSON
PERIOD FROM JANUARY 1, 2002 TO JUNE 30, 2006**

Periods	Homeland Financial Service, Inc.			Financial Liberty Services, LLC			National Support Services, LLC		Nationwide Debt Services, LLC		Total
	Wade Torkelson	TLT Development	Total	Wade Torkelson	TLT Development	Total	Wade Torkelson	Total	Wade Torkelson	Total	
Year 2002	\$ 14,300.99	\$ -	\$ 14,300.99	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,300.99
Year 2003	176,044.33	60,000.00	236,044.33	-	-	-	-	-	-	-	236,044.33
Year 2004	156,211.50	1,140,014.00	1,296,225.50	-	552,980.00	552,980.00	-	-	-	-	1,849,205.50
Year 2005	-	549,000.00	549,000.00	-	640,192.31	640,192.31	281,408.79	-	-	-	1,470,601.10
01/01/06 to 06/30/06	-	40,492.50	40,492.50	-	424,081.50	424,081.50	94,504.67	4,653.56	-	-	563,732.23
Total	\$ 346,556.82	\$ 1,789,506.50	\$ 2,136,063.32	\$ -	\$ 1,617,253.81	\$ 1,617,253.81	\$ 375,913.46	\$ 4,653.56	\$ -	\$ -	\$ 4,133,884.15

Year 2002:

Salary, W-2	\$ 4,051.41
Various fees	10,249.58
	<u>\$ 14,300.99</u>

Year 2003:

Salary, W-2	\$ 86,590.63
Various fees	89,453.70
	\$ 60,000.00
	<u>\$ 176,044.33</u>
	<u>\$ 60,000.00</u>

A GROUP OF COMPANIES EQUALLY OWNED BY DENNIS CONNELLY AND WADE TORKELSON

**SUMMARY OF PAYMENTS TO WADE TORKELSON
PERIOD FROM JANUARY 1, 2002 TO JUNE 30, 2006**

Periods	Homeland Financial Service, Inc.		Financial Liberty Services, LLC		National Support Services, LLC		Nationwide Debt Services, LLC		Total
	Wade Torkelson	TLT Development	Wade Torkelson	TLT Development	Wade Torkelson	TLT Development	Wade Torkelson	TLT Development	
Year 2004:									
Salary, W-2	\$ 114,115.43								
Advances	30,000.00								
Various fees	815.00	\$ 1,140,014.00		\$ 552,980.00					
AMEX	11,281.07	-		-					
	<u>\$ 156,211.50</u>	<u>\$ 1,140,014.00</u>		<u>\$ 552,980.00</u>					
Year 2005:									
Salary, W-2					\$ 221,153.94				
Various fees		\$ 549,000.00		\$ 640,192.31					
AMEX		-		-	60,254.85				
		<u>\$ 549,000.00</u>		<u>\$ 640,192.31</u>	<u>\$ 281,408.79</u>				
01/01/06 to 06/30/06:									
Salary		\$ 40,492.50		\$ 424,081.50	\$ 86,538.44				\$ 4,653.56
Various fees		-		-	-				-
AMEX		<u>\$ 40,492.50</u>		<u>\$ 424,081.50</u>	<u>7,966.23</u>				<u>\$ 4,653.56</u>

TAB 3

NATIONWIDE SUPPORT SERVICES, INC.
(A California Corporation Equally Owned by Joanne Garneau and
Art Garneau and Monitored by Robb Evans and Robb Evans &
Associates LLC)

SUMMARY OF FEES RECEIVED FROM CONSUMERS AND AFFILIATE, COMMISSIONS PAID, AND
PAYMENTS TO DEFENDANT PROSPER FINANCIAL SOLUTIONS AND TO OTHER AFFILIATE
PERIOD FROM OCTOBER 1, 2005 (COMMENCEMENT OF OPERATIONS) TO JUNE 30, 2006

	Period from Oct. 1, 2005 to Dec. 31, 2005	Period from Jan. 1, 2006 to Jun. 30, 2006	Total
Fees received from consumers	<u>\$ 335,850.54</u>	<u>\$ 4,680,062.30</u>	<u>\$ 5,015,912.84</u>
Service fees received from National Support Services, LLC, the wholly-owned subsidiary of Financial Liberty Services, LLC, a company equally owned by defendants Dennis Connelly and Wade Torkelson	<u>\$ -</u>	<u>\$ 60,000.00</u>	<u>\$ 60,000.00</u>
Commission Payments:			
Robina Capital Inc., dba Prosper Financial Solutions, a defendant	\$ (21,125.04)	\$ (544,310.03)	\$ (565,435.07)
Four other unrelated companies	<u>(10,655.81)</u>	<u>(2,090,022.81)</u>	<u>(2,100,678.62)</u>
Total commission payments	<u>\$ (31,780.85)</u>	<u>\$ (2,634,332.84)</u>	<u>\$ (2,666,113.69)</u>
Payments to Affiliates:			
Headlands Resources, Inc., a California corporation owned by Joanne Garneau and Art Garneau, for staffing cost	\$ (23,947.93)	\$ (578,548.09)	\$ (602,496.02)
Marbrisa Equities, LLC, a company 99% owned by Garneau Family Trust, for management services	-	(254,000.00)	(254,000.00)
Art Garneau, expense reimbursements	(1,849.83)	(12,111.78)	(13,961.61)
Joanne Garneau, expense reimbursements	<u>(554.47)</u>	<u>(2,464.49)</u>	<u>(3,018.96)</u>
Total payments to affiliates	<u>\$ (26,352.23)</u>	<u>\$ (847,124.36)</u>	<u>\$ (873,476.59)</u>
Principal-only payments of the \$1,560,000 promissory note arising from purchase of future serving rights on three support services agreements from Financial Liberty Services, LLC	<u>\$ -</u>	<u>\$ (503,000.00)</u>	<u>\$ (503,000.00)</u>
Payments to National Support Services, LLC for the purchase of office equipment and office supplies	<u>\$ -</u>	<u>\$ (44,000.00)</u>	<u>\$ (44,000.00)</u>

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is **444 South Flower Street, Los Angeles, California 90071.**

On September 14, 2006, I served the **REPORT OF TEMPORARY RECEIVER'S AND MONITOR'S ACTIVITIES FOR THER PERIOD AUGUST 10, 2006 THROUGH AUGUST 31, 2006** on the interested parties in this action via e-mail and by placing a **true copy/original** thereof, enclosed in a sealed envelope, all charges paid, addressed as follows:

SEE ATTACHED MAILING LIST.

I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for pick up and delivery by Federal Express.

The foregoing sealed envelope was placed for pick up and delivery this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with all charges thereon fully paid with Federal Express at Los Angeles, California, in the ordinary course of such business.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(FEDERAL) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed at the office of a member of the bar of this Court at whose direction the service was made.

Executed on September 14, 2006 at Los Angeles, California.



Signature

Pamela A. Coates

Print Name

MAILING LIST

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