

**ROBB EVANS OF
ROBB EVANS & ASSOCIATES LLC
Receiver of I Works, Inc., et al. and
the Assets of Jeremy Johnson**

11450 Sheldon Street
Sun Valley, California 91352-1121
Telephone No.: (818) 768-8100
Facsimile No.: (818) 768-8802

**Federal Trade Commission v. Jeremy Johnson, I Works, Inc., et al.
CASE No. 2:10-CV-02203-MMD-GWF**

Notice of Motion and Motion for Order:

- (1) Approving and Authorizing Payment of Receiver's and Professionals' Fees and Expenses from December 1, 2013 Through April 30, 2014; and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

**Memorandum of Points and Authorities in Support Thereof
Declaration of Gary Owen Caris in Support Thereof
Declaration of Brick Kane in Support Thereof**

Filed June 20, 2014

1 RANDOLPH L. HOWARD (Nev. SBN 006688)
rhoward@klnevada.com
2 KOLESAR & LEATHAM, CHTD.
400 South Rampart Boulevard, Suite 400
3 Las Vegas, NV 89145
Telephone: (702) 362-7800
4 Direct: (702) 889-7752
Facsimile: (702) 362-9472

5 GARY OWEN CARIS (Cal. SBN 088918)
gcaris@mckennalong.com
6 LESLEY ANNE HAWES (Cal. SBN 117101)
lhawes@mckennalong.com
7 MCKENNA LONG & ALDRIDGE LLP
300 South Grand Avenue, 14th Floor
8 Los Angeles, CA 90071-3124
Telephone: (213) 688-1000
9 Facsimile: (213) 243-6330

10 Attorneys for Receiver
11 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**
12 **LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION,
16

17 Plaintiff,

18 v.

19 JEREMY JOHNSON, individually, as officer
20 of Defendants I Works, Inc., etc., et al.,

21 Defendants.
22
23
24
25
26
27
28

Case No. 2:10-CV-02203-MMD-GWF

**NOTICE OF MOTION AND MOTION
FOR ORDER (1) APPROVING AND
AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS'
FEES AND EXPENSES FROM
DECEMBER 1, 2013 THROUGH APRIL
30, 2014; AND (2) GRANTING RELIEF
FROM LOCAL RULE 66-5
PERTAINING TO NOTICE TO
CREDITORS; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT THEREOF**

1 PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC
2 (“Receiver”), the Receiver pursuant to the Court’s Preliminary Injunction Order issued February
3 10, 2011, hereby moves the Court for an order for the following relief:

4 1. An order approving and authorizing payment of receivership fees and expenses
5 incurred for the five-month period from December 1, 2013 through April 30, 2014 (“Expense
6 Period”), including payment of the fees of the Receiver, the Receiver’s deputies, agents, staff and
7 professionals, and reimbursement of costs incurred during the Expense Period in the total sum of
8 \$350,026.78. The fees of the Receiver, his deputies, agents and staff total \$71,377.57 and the
9 Receiver’s expenses total \$21,646.94 during the Expense Period. The Receiver’s legal fees and
10 expenses total \$257,002.27 during the Expense Period, including fees of \$237,243.60 and
11 expenses of \$15,946.46 incurred to the Receiver’s lead counsel McKenna Long & Aldridge LLP
12 for a total of \$253,190.06, expenses of the Receiver’s local counsel in Nevada, Kolesar &
13 Leatham, Chtd., in the sum of \$507.64, and fees in the amount of \$2,446.25 and expenses in the
14 amount of \$858.32 for services of the Receiver’s special litigation and real estate counsel in Utah,
15 Hatch, James & Dodge, P.C.; and

16 2. An order deeming notice of this Motion to be sufficient under Local Civil Rule 66-
17 5 based on the service of the notice of the filing of this Motion and the Motion on all parties and
18 service of the notice of the filing of the Motion on all known non-consumer creditors of the estate
19 concurrent with the filing of this Motion with the Court, but not the tens of thousands of potential
20 consumer creditors of the estate.

21 This Motion is made pursuant to Local Civil Rules 7-2 and 66-5 and is based upon this
22 notice of motion and motion, the separate notice of filing of the Motion served concurrently
23 herewith, the accompanying memorandum of points and authorities and the Declarations of Brick
24 Kane and Gary Owen Caris in support hereof, the separate Appendix of Exhibits filed
25 concurrently herewith in support hereof, any reply, upon the pleadings, files and records of the
26 Court in this case of which the Receiver requests the Court take judicial notice, including without
27 limitation the Report of Temporary Receiver’s Activities filed February 8, 2011 (Doc. No. 127)
28 and the Report of Receiver’s Financial Reconstruction dated January 31, 2012 and four volumes

1 of supporting Appendices filed on February 3, 2012 (Doc. Nos. 464, 465-468), the Order
2 Granting Motion for Order Clarifying Preliminary Injunction Order and for Further Instructions
3 Regarding Scope of Receivership Defendants under Preliminary Injunction Order and Report of
4 Receiver's Financial Reconstruction and Granting Relief from Local Rule 66-5 Pertaining to
5 Notice to Creditors After Hearing ("Clarifying Order") entered March 25, 2013 and upon all other
6 pleadings and documentary evidence as may be presented to the Court by the Receiver.

7
8 Dated: June 20, 2014

Respectfully submitted,

9
10 RANDOLPH L. HOWARD
KOLESAR & LEATHAM, CHTD.

11 MCKENNA LONG & ALDRIDGE LLP
12 GARY OWEN CARIS
LESLEY ANNE HAWES

13
14 By: /s/ Gary Owen Caris

15 Gary Owen Caris
16 Lesley Anne Hawes

17 Attorneys for Receiver
18 **ROBB EVANS OF ROBB EVANS &
19 ASSOCIATES LLC**

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 On January 13, 2011, the Receiver was appointed Temporary Receiver over I Works, Inc.
4 ("I Works"), numerous other Corporate Defendants as defined in the Temporary Restraining
5 Order and over the assets of defendant Jeremy Johnson (collectively the "Receivership
6 Defendants"). Pursuant to the Preliminary Injunction Order entered February 10, 2011
7 ("Preliminary Injunction"), the Receiver has been appointed permanent receiver over the
8 Receivership Defendants. On March 25, 2013, the Court issued the Clarifying Order which
9 clarified the scope of the Receivership Defendants and receivership property as including over 60
10 additional entities and assets of individuals based on overwhelming proof that those assets and
11 entities were beneficially owned by Jeremy Johnson and/or were subsidiaries, affiliates,
12 successors and assigns of the named Corporate Defendants.

13 During the almost three years that the receivership has been pending, the Receiver has
14 filed six prior fee motions which in the aggregate cover the period from the inception of the
15 receivership through November 30, 2013. Five of the prior fee motions have been granted as
16 requested, except that the Receiver's counsel modified one prior fee motion to reduce the fees
17 sought by the Receiver's lead counsel, McKenna Long & Aldridge LLP, by \$2,000. The sixth fee
18 motion covering the expense period from August 1, 2013 through and including November 30,
19 2013 was filed by the Receiver on February 26, 2014. No responses or oppositions to that
20 motion have been filed, and the motion remains pending for the Court's determination. This is the
21 Receiver's seventh motion for approval and payment of fees and expenses, covering a five-month
22 period from December 1, 2013 through April 30, 2014 ("Expense Period").

23 In addition to the Receiver's fee motions, which contain a comprehensive summary of the
24 Receiver's activities in the case during the period covered by each motion as well as a financial
25 report regarding the receipts and expenses of the receivership estate, the Receiver has filed two
26 reports in the case. The Report of Temporary Receiver's Activities ("First Report") was filed
27 February 8, 2011 prior to the hearing on the Preliminary Injunction and reported on the Receiver's
28 initial findings and investigation into I Works and \$50.4 million in net profits transferred from the

1 I Works enterprise to or for the benefit of Jeremy Johnson. The Report of Receiver's Financial
2 Reconstruction ("Second Report") was filed on February 3, 2012 and detailed an additional \$51.4
3 million in funds from payment processing transferred to or for the benefit of Jeremy Johnson
4 through a complex web of entities and persons to conceal and remove valuable assets of the
5 receivership estate from the reach of the Receiver and the creditors of Jeremy Johnson and the
6 other named Receivership Defendants. Based on the Receiver's findings in the Second Report
7 and his ongoing investigation, the Receiver filed a Motion to Clarify to confirm the status of those
8 numerous entities and assets nominally held by third parties but beneficially owned and
9 controlled by Jeremy Johnson, which was granted by the Court after extensive briefing and
10 evidence through the Clarifying Order.

11 A large number of the persons and entities covered by the Clarifying Order have been
12 referred to as the "Todd Vowell Parties" since Todd Vowell is the nominal owner and/or manager
13 of the entities. The Todd Vowell Parties appealed the Clarifying Order, but thereafter entered
14 into extensive settlement negotiations with the Receiver to resolve their disputes and address the
15 Receiver's claims to the assets of the Todd Vowell Parties. Those negotiations culminated in a
16 detailed settlement agreement with the Todd Vowell Parties which was approved by the Court
17 during the Expense Period and implemented by the Receiver after Court approval, as addressed
18 hereafter. The Receiver also continued his administration and in some cases liquidation of assets
19 subject to the Clarifying Order.

20 During this Expense Period, the Receiver made additional recoveries for the estate totaling
21 approximately \$827,000.00 from a number of sources, including the completion of the sales of
22 three real properties, collection of rental receipts from properties being administered by the estate,
23 receipt of payments due under the settlement reached in a prior period with Mountain Financial,
24 turnover of funds from Sunfirst Bank accounts and additional proceeds from the Court-approved
25 liquidation of an investment by Orange Cat Investments. As detailed in the Motion and in the
26 Receiver's and counsel's billing records, the Receiver also filed a number of other motions to
27 approve sales of assets during the current Expense Period which remain pending as are motions
28 filed in a prior expense period to approve a sale of the Three Woodsvew Properties and to

1 approve a proposed settlement with the Peterson Parties concerning Paradise Ranch. In addition,
2 the Receiver continued negotiations with Destiny Davis concerning real property in Las Vegas,
3 Nevada subject to a claim by the Receiver, and the Court approved that settlement on an
4 emergency motion filed by the Receiver in May 2014, just after the end of the Expense Period,
5 which resulted in a payment to the estate of \$625,000. If the pending motions are granted, the
6 Receiver anticipates the combined recoveries for the estate from the Destiny Davis settlement and
7 the matters subject to the pending motions to be nearly \$2 million.

8 The Receiver's investigation of and efforts to recover additional receivership property
9 have continued with two depositions conducted by the Receiver of Jeremy Johnson and Duane
10 Fielding. The Receiver's discovery also included an attempt to depose Ryan Anderson, a
11 business associate of Jeremy Johnson who owns the landscape company LandTrends that
12 provides landscape services at the 529 S. Woodsvie Circle residence, and a production of
13 tangible things, specifically precious metals, by Success Multimedia, LLC through its
14 representative Ryan Gardner.

15 In addition to significant activities by the Receiver in the administration and in some
16 instances liquidation of the estate's interests in receivership assets, during this Expense Period the
17 Receiver filed nine motions in the main receivership case, four responses or oppositions to
18 motions filed by Jeremy Johnson and an informal response to an informal filing by Jason Vowell,
19 and three sets of reply papers to oppositions filed by Jeremy Johnson and Sharla Johnson to
20 motions by the Receiver. The Receiver's counsel also prepared for and argued before the Court
21 of Appeals for the Ninth Circuit on February 3, 2014 at a lengthy oral argument on the appeals of
22 the Clarifying Order filed by Sharla Johnson, Zibby, LLC, Zibby Flight Services, LLC, and
23 Orange Cat Investments, LLC and by Duane Fielding, Network Agenda, LLC, Anthon Holdings
24 Corp., Rotortrends, Inc., iPrerogative, LLC, SLI, LLC and Trigger, LLC. The Clarifying Order
25 was affirmed in its entirety by the Court of Appeals as to all appealing parties.

26 The Receiver also filed pleadings in and completed negotiations with the parties in the
27 related litigation against Arvin Lee Black, II ("Black") and Sole Group, LLC ("Sole Group")
28 which have resulted in a stipulated resolution of the litigation as to almost all parties. The

1 Receiver filed an application for entry of default judgments against Black and Sole Group which
2 is pending.

3 The services rendered by the Receiver, his deputies, staff and counsel during this Expense
4 Period have been extensive, necessary and appropriate under the circumstances. The services
5 have preserved and realized significant value for the estate and its creditors.

6 **II. SUMMARY OF RECEIVER'S AND PROFESSIONALS' SERVICES AND**
7 **ACTIVITIES DURING THE EXPENSE PERIOD**

8 The fees and expenses for which the Receiver seeks approval, and the services rendered
9 by the Receiver and his counsel during this Expense Period, are summarized hereafter and
10 described in detail in the billing records attached to the supporting Declarations of Brick Kane
11 and Gary Owen Caris.

12 The Receiver seeks payment of the Receiver's fees and expenses summarized in the
13 Administrative Expenses and Fund Balance spreadsheet ("Financial Summary") attached as
14 Exhibit 1 to the Declaration of Brick Kane in support of this Motion and detailed in the billing
15 summaries set forth in the separate Appendix of Exhibits as Exhibits 2 through 6. During the
16 Expense Period, the Receiver has incurred fees for the Receiver and his deputies of \$34,287.10,
17 Senior Staff fees of \$33,432.10, Information Technology (IT) fees of \$2,323.07, and Support
18 Staff fees of \$1,335.30, for total Receiver fees of \$71,377.57 for the period. The Receiver has
19 incurred Receiver's expenses of \$21,646.94. The primary component of the Receiver's expenses
20 consists of expenses for investigative search costs.

21 The Receiver has incurred fees and expenses for the services of the Receiver's attorneys,
22 including the Receiver's lead counsel, McKenna Long & Aldridge LLP ("McKenna Firm"), and
23 the Receiver's local counsel, Kolesar & Leatham Chtd. ("Kolesar Firm"). During the current
24 Expense Period, the Receiver specifically has incurred attorneys' fees of \$237,243.60 and costs of
25 \$15,949.46 to the McKenna Firm, costs of \$507.64 to the Kolesar Firm, and legal fees of
26 \$2,446.25 and costs of \$858.32 to the Receiver's special litigation and real estate counsel in Utah,
27 Hatch, James & Dodge, P.C. ("Hatch Firm") for total legal fees and costs in this period of
28 \$257,002.27. The redacted billing records describing the services of the McKenna Firm, the

1 Kolesar Firm and the Hatch Firm are attached as Exhibits 7 through 13 to the separate Appendix
2 of Exhibits filed in support of this motion.

3 The redacted invoices for both the Receiver and his counsel provide detailed, itemized
4 descriptions of the extensive services rendered during the Expense Period which have helped to
5 achieve over \$19.2 million in recoveries for the estate as of the end of the Expense Period. The
6 key activities during the Expense Period and services of the Receiver and counsel are summarized
7 below.

8 A. Implementation of Todd Vowell Parties Settlement After Court Approval

9 Under the Clarifying Order, the assets of the Todd Vowell and Sheree Vowell
10 (collectively the "Vowells") and numerous entities which the Receiver contends were nominally
11 owned and controlled by Todd Vowell and included in the Todd Vowell Parties are receivership
12 property subject to the Receiver's administration. The Clarifying Order left for later
13 determination the disposition of the Motion to Clarify as it pertained to the entities Virgin
14 Properties, LLC ("Virgin Properties"), Liahona Academy for Youth, LLC ("Liahona Academy
15 for Youth"), and Executive Car Sales, Inc. ("Executive Car Sales") (collectively referred to herein
16 as the "Virgin Properties Group"). In November 2013, the Receiver completed negotiations with
17 those parties to reach separate comprehensive settlements with the Todd Vowell Parties and the
18 Virgin Properties Group. The Court granted the Receiver's motion for approval of those
19 settlements by order entered on December 11, 2014 (Doc. No. 1303).

20 The implementation of the Todd Vowell Parties Settlement and the related Virgin
21 Properties Group Settlement required many activities by the Receiver and counsel. In addition to
22 the settlement agreements themselves, there were sixteen additional documents to be executed by
23 the parties, including a promissory note, modification to a promissory note, multiple deeds of
24 trust, multiple grant deeds, multiple subordination, non-disturbance and attornment agreements
25 and multiple withdrawals of lis pendens. Numerous documents were to be recorded and required
26 title insurance for the estate's interests in the properties being transferred to the estate and/or
27 deeds of trust and other recorded interests obtained by the estate. The Receiver and his counsel
28 addressed title insurance issues with the title company which assisted in the recording of many of

1 the documents. The implementation of the settlements has also involved the Receiver's
2 calculation of payments and monitoring of receipt of funds from the settling parties.

3 With respect to the Todd Vowell Parties appeal, the Receiver obtained extensions of the
4 deadline to file his Respondent's Brief in light of the pending settlement. The Receiver's counsel
5 sought an additional extension of the filing deadline based on the pending motion for approval of
6 the settlement, and when the Court approved the Todd Vowell Parties Settlement in December
7 2013, the Todd Vowell Parties dismissed their appeal of the Clarifying Order with prejudice.

8 B. Ninth Circuit Appeals of the Clarifying Order by Sharla Johnson and Related
9 Entities and Duane Fielding and Related Entities

10 The appeal of the Clarifying Order by Sharla Johnson, Zibby, Zibby Flight, Orange Cat,
11 Fielding and by the Fielding-related entities Anthon Holdings, Network Agenda, SLI, Trigger,
12 iPrerogative and Rotortrends involved numerous persons and entities as to which different
13 evidence was presented in this Court in support of the entry of the order and different grounds
14 supported the Court of Appeals affirming the Court's ruling. The Sharla Johnson-related
15 appellants filed extensive opening and reply briefs, citing dozens of authorities, as well as
16 extensive excerpts of record that both the Receiver and the FTC nevertheless supplemented with
17 their respective respondent's briefs. The Fielding-related appellants filed their own separate
18 appellant's brief and excerpts of record.

19 Preparation for oral argument in the Ninth Circuit also required extensive work by the
20 Receiver's counsel during this Expense Period. The Receiver's counsel had to review all briefing
21 by the parties and the key authorities cited in the briefs. The Receiver's counsel had to anticipate
22 potential areas of questioning and coordinate oral argument with the FTC, since the Court's
23 instructions prior to the hearing required the Receiver and the FTC to divide the 15 minutes in
24 allotted time between the two counsel for the respondents.

25 Although a total of 30 minutes was scheduled for the oral argument, the Sharla Johnson
26 and Fielding appeals were set near the end of the morning court calendar, and oral argument
27 allowed by the Court exceeded the time allotted to each side. On April 8, 2014, the Ninth Circuit
28 issued its decision affirming the Clarifying Order as to all appellants.

1 C. Administration and/or Sale of Receivership Assets

2 During the current Expense Period, the Receiver filed four motions for authorization to
3 sell real properties concerning properties which the Receiver had been previously granted the
4 right to list and market. Of those four motions, two have been granted with orders entered by the
5 Court authorizing the Receiver to sell the Arrowhead Trail residence and the two vacant lots
6 located in Chamberlain Ranch. Those sales have closed, and the net proceeds in the aggregate
7 sum of over \$412,000 have been paid to the receivership estate. The other two sale motions
8 involving the Boulder Mountain Property and a condominium located in Salt Lake City have not
9 been opposed and remain pending for Court determination.

10 The Receiver filed an additional motion to authorize the Receiver to sell the property
11 located at 2988 Kings Court Lane to a third party. The Kings Court Property was the former
12 residence of defendant Loyd Johnston, as to which the receivership estate held a deed of trust and
13 on which the Receiver completed a foreclosure, taking title to the property on behalf of the estate.
14 The buyer of the Kings Court Property had designated the property as the downleg of her 1031
15 tax-free exchange, and because of a tax lien on the Kings Court Property, the Receiver had to
16 delay seeking approval of the sale of that property until the redemption period had passed. The
17 Receiver's counsel filed an emergency motion to approve the sale, and defendant Jeremy Johnson
18 filed an opposition to the motion to which the Receiver filed a reply. The Court granted the
19 Receiver's motion to approve that sale, and the estate obtained net sale proceeds of \$240,979.03
20 from the sale.

21 The Receiver has also been administering and attempting to sell a houseboat located on
22 Lake Powell known as the "Animal House" pursuant to a prior order of the Court issued in
23 August 2011. After attempting to market the houseboat through a private broker for over two
24 years without success, the Receiver filed a motion for authorization to conduct a public auction of
25 the houseboat, which was unencumbered. The Court granted the Receiver's motion, and the
26 houseboat was recently sold at auction with the estate expected to receive net proceeds from the
27 sale in excess of \$100,000 after commissions.

1 With respect to the Paradise Ranch property located in Hurricane, Utah, in a prior expense
2 period the Receiver filed a motion for approval of a settlement with Brent and Loretta Peterson
3 and Paradise Ranch Development, LLC (Utah) ("Peterson Parties") regarding that property (Doc.
4 No. 1198). The motion was opposed by defendant Jeremy Johnson. Later, Johnson filed a
5 motion to "release" the Paradise Ranch property from the receivership estate and sell it to Johnson
6 or an investment group with which he was affiliated. During this Expense Period, the Receiver
7 filed an opposition to Johnson's motion to release Paradise Ranch from the receivership. Both
8 motions remain pending, and while those motions are pending, the Receiver has continued to
9 collect rents from the tenants at the property, has extended the vacate dates for the tenants and has
10 continued to administer that asset while the Court considers the motions.

11 Another motion filed in a prior expense period that remains pending is the Receiver's
12 motion for approval of proposed sales of the Three Woodsvew Properties (Doc. No.1189)
13 ("Woodsvew Sale Motion"). The Woodsvew Sale Motion was opposed by Jeremy Johnson.
14 That motion has been fully briefed and is subject to determination by the Court. The Receiver
15 was contacted by the proposed buyers of the Three Woodsvew Properties who indicated that they
16 were likely to terminate the sale contracts and forfeit their deposits to the estate, and the Receiver
17 filed a pleading so advising the Court during this Expense Period.

18 During the current Expense Period, the Receiver also filed a motion asking the Court for
19 permission to take possession, custody and control of Johnson's residence located at 529 S.
20 Woodsvew Circle. The grounds for the motion included the fact that Sharla Johnson and her
21 children had moved out of the property and that the Johnsons were allowing a commercial
22 enterprise, specifically a retreat facility, to use the property for its commercial purposes and that
23 third parties were occupying the premises in connection with that commercial activity. Johnson
24 vigorously opposed that motion, and the Receiver filed detailed reply papers. Thereafter, Johnson
25 filed a series of motions to which the Receiver had to respond, including two separate motions to
26 strike the declarations of the Receiver's sales agent, James Fales, and the Receiver's counsel, Gary
27 Owen Caris, and a motion to replace Fales as the Receiver's broker. Those motions, along with

28

1 the Receiver's motion to take custody, control and possession of the 529 S. Woodsvie property,
2 are also pending.

3 The Receiver made repeated demands on defendant Fielding and counsel for Rotortrends
4 for compliance with the Clarifying Order and Preliminary Injunction. The Receiver's demands
5 were met with a refusal to turn over the 1996 Robinson helicopter and the amount of insurance
6 proceeds Fielding obtained for another aircraft. Fielding and Rotortrends failed to comply with
7 the Receiver's turnover demands, and the 1996 Robinson helicopter was destroyed in a crash. The
8 Receiver is continuing to investigate the disposition of insurance proceeds from these aircraft and
9 is evaluating the estate's potential claims against Fielding and others associated with Rotortrends,
10 including its counsel.

11 The sales of assets have required the Receiver and his counsel to work together on the
12 documentation and review of the sale agreements, address issues in the preliminary title reports
13 and address the appropriate terms and conditions of the sales which vary depending on the
14 circumstances of the sale, the nature of the asset, and time constraints that may affect the sale.
15 The sales also require discussions, negotiation and coordination by the Receiver and/or his
16 counsel with the buyer or the buyer's attorney or sales agent as well as any broker for the estate,
17 as applicable.

18 The Receiver has continued to supervise and administer the EZ Livin trailer park in
19 Arizona. The Receiver also continues to monitor the liquidation of the Marathon investment tied
20 up in the MF Global bankruptcy, an investment which was authorized to be liquidated in 2011.

21 The Receiver and its counsel also had to address certain raw land located in Hurricane,
22 Utah titled to New Horizons Finance, Inc. At the end of the prior expense period, the Receiver
23 discovered that the property had been conveyed by Andy Johnson to Ryan Anderson. Title to the
24 property was subsequently restored to New Horizons Finance, Inc. based on demands by the
25 Receiver's counsel. A lis pendens has been recorded against that property and the Receiver is
26 evaluating that property.

1 D. Depositions and Subpoenas

2 The Receiver, through counsel, conducted two depositions during this Expense Period in
3 St. George, Utah, specifically depositions of Jeremy Johnson and Duane Fielding. The
4 depositions were taken on consecutive days to minimize travel expenses.

5 The depositions required significant preparation. The deposition of Jeremy Johnson, a
6 copy of the transcript of which is on file with the Court, focused on investigating multiple assets
7 that the Receiver contends may constitute receivership property based on the source of funding
8 and circumstances surrounding their acquisition and/or disposition. The deposition of Duane
9 Fielding addressed two aircraft titled to Rotortrends and the insurance proceeds related to one of
10 those aircraft. The Receiver's investigation into these assets is continuing.

11 The Receiver's deposition of Johnson was not concluded, and the Receiver requested that
12 Johnson appear for his continued deposition. After the exchange of several e-mails, Johnson
13 agreed and a deposition date in April 2014 was scheduled by the parties. Counsel for the
14 Receiver had to postpone that deposition date because of an urgent issue that arose in another
15 matter, and despite his prior agreement to appear, Johnson later refused to agree to appear for a
16 rescheduled deposition date. After the end of the Expense Period, the Receiver filed a motion to
17 compel Jeremy Johnson to appear for his continued deposition which is scheduled for hearing
18 before Magistrate Judge Foley on July 2, 2014.

19 The Receiver attempted to serve Ryan Anderson with a deposition subpoena. Ryan
20 Anderson is a friend of Johnson's and is affiliated with the company LandTrends which provides
21 landscaping services for the 529 S. Woodview property. Despite many attempts to serve the
22 subpoena, the Receiver's process server was not able to serve the prospective witness. The
23 Receiver will continue to seek his deposition at a later date.

24 The Receiver served a subpoena for the production of tangible things on Success
25 Multimedia, LLC located near Salt Lake City, Utah. The Receiver sought the production of
26 certain precious metals by that entity so that they could be inspected, inventoried and appraised.
27 Counsel for the Receiver obtained an appraiser to conduct the inspection, which was supervised
28 by local counsel from the Hatch Firm. The Receiver has made demands on Success Multimedia,

1 LLC for additional information and production of what the Receiver believes to be the additional
2 precious metals that should have been included in the production and is developing strategies to
3 address Success Multimedia's failure to comply with those demands.

4 E. Pending Lawsuits Filed by Receiver

5 The Receiver filed suit against numerous third parties arising out of a fraudulent scheme
6 perpetrated by Sole Group and Black by which millions of dollars in receivership assets were
7 transferred to Black and Sole Group (Case No. 2:12-cv-01860-MMD-GWF). The Receiver
8 asserted fraudulent transfer claims against Black, his spouse Atia Black and Sole Group and a
9 declaratory relief claim against the remaining defendants to attempt to sort out the rights, claims
10 and interests the estate and those parties have in any assets of Black, Atia Black and Sole Group
11 in light of the Black/Sole Group fraudulent scheme. Black entered into a plea agreement in a
12 criminal indictment against him in federal court in Utah arising out of the fraudulent scheme.

13 During the Expense Period, the Receiver completed discussions with the non-defaulted
14 parties to this action and entered into a stipulation which resolves the action in its entirety as to
15 the non-defaulted parties. The Court recently approved the stipulation and entered the order
16 resolving the matter as to the non-defaulted parties. During the Expense Period, the Receiver
17 prepared and filed an application for entry of default judgments against Black and Sole Group
18 which are pending before the Court. The Receiver has dismissed his claims against Todd Vowell,
19 Kombi Capital, Fishhook Partners and Paydirt Capital, Inc. pursuant to the Todd Vowell Parties
20 Settlement.

21 F. Other Court Filings, Motions, and Responses

22 During this Expense Period, the Receiver's counsel filed nine motions seeking substantive
23 relief, most of which were lengthy and detailed and some of which sought multiple items of relief
24 as described above. In addition to the nine motions, the Receiver filed four oppositions to
25 motions filed by Jeremy Johnson and three replies to Johnson's oppositions to motions filed by
26 the Receiver. The Receiver also filed a motion for approval of a stipulation with the FTC and the
27 Federal Deposit Insurance Corporation ("FDIC") for the turnover of funds totaling over \$15,000
28 to the receivership estate by the FDIC from Sunfirst Bank accounts.

1 The Receiver also filed a fee motion during this period covering the four-month expense
2 period of August 1, 2013 through November 30, 2013. That motion was not opposed. The
3 motion is pending before the Court for determination.

4 G. Ongoing Administrative and Other Activities by the Receiver and Counsel

5 The Receiver's services and those of his counsel include numerous other administrative
6 and legal activities during this Expense Period. The Receiver's deputies and staff respond to
7 inquiries from creditors, taxing authorities and others, prepare and reconcile the Receiver's
8 accounting records for the case, address tax issues concerning the estate, deal with banks and
9 other financial institutions which may have receivership funds or documentation for accounts of
10 Receivership Defendants and perform other similar administrative tasks. The Receiver's
11 deputies and staff respond to and cooperate with law enforcement inquiries and activities as
12 required under the Preliminary Injunction. The Receiver's counsel responds to inquiries received
13 from creditors and others, including taxing authorities, files notices of pending actions to protect
14 real estate assets if deemed appropriate, and also performs numerous other tasks in advising the
15 Receiver and rendering services as Receiver's counsel to protect the estate, pursue claim
16 enforcement, negotiate with various persons and entities that are the subject of potential claims by
17 the Receiver, enforce the Preliminary Injunction and otherwise advance the interests of the estate.

18 Numerous and varied issues arise in the supervision and administration of the estate by the
19 Receiver which are detailed in the billing records of the Receiver and counsel filed in support of
20 this Motion. The Receiver performs regular accounting and bank reconciliations for the
21 receivership accounts and through counsel provides copies of the monthly bank statements to the
22 parties pursuant to the Preliminary Injunction. The Receiver also maintains and updates creditor
23 lists for the case.

24 H. Costs

25 The primary costs incurred by the Receiver during this five-month Expense Period
26 concern investigative costs, as reflected in the Financial Summary attached as Exhibit 1 to the
27 Declaration of Brick Kane in support of this Motion. The costs incurred by the McKenna Firm
28 consist primarily of costs incurred for the transcripts of the depositions and travel for those

1 depositions, process server fees for service of subpoenas, reproduction costs for service of
2 pleadings and research. These expenses are out-of-pocket expenses incurred by the McKenna
3 Firm to third parties and passed through to the Receiver without mark up or modification.

4 **III. THE FEES AND EXPENSES OF THE RECEIVER AND HIS PROFESSIONALS**
5 **SHOULD BE APPROVED**

6 It is a fundamental tenet of receivership law that expenses of administration incurred by
7 the receiver, including those of the receiver, its counsel and others employed by the receiver,
8 constitute priority expenses for which compensation should be paid from the assets of the
9 receivership. As explained in the leading treatise *Clark on Receivers*:

10 The obligations and expenses which the court creates in its
11 administration of the property are necessarily burdens on the
12 property taken possession of, and this, irrespective of the question
13 who may be the ultimate owner, or who may have the preferred
14 lien, or who may invoke the receivership. The appointing court
15 pledges its good faith that all duly authorized obligations incurred
16 during the receivership shall be paid.

17 2 Clark, Ralph Ewing, *A Treatise on the Law and Practice of Receivers* § 637, p. 1052 (3rd ed.
18 1992).

19 The Motion establishes that the Receiver, his deputies, staff and counsel rendered
20 extensive and complex services and obtained significant and excellent results for the receivership
21 estate during the Expense Period. *See Federal Trade Commission v. Capital Acquisitions &*
22 *Management Corp.*, 2005 U.S. Dist. LEXIS 18504 (N.D. Ill. August 26, 2005). The activities in
23 the receivership by both the Receiver and his counsel are wide-ranging and varied. The billing
24 rates charged in this case reflected in the billing records filed in support of the Motion for the
25 Receiver, the Receiver's members and senior accounting staff are discounted at 10% from the
26 rates charged by the Receiver's firm in private sector cases as of the time of the Receiver's
27 appointment. Because the Receiver does not raise the rates charged for its professionals during
28 the case, and because the Receiver established discounted rates in this case based on its 2010

1 private sector rates even though the Receiver did not commence work until January 2011, the
2 Receiver's overall rates in effect in this case are discounted materially more than 10% compared
3 to its current rates for 2014. The rates charged by the McKenna Firm for its attorneys and
4 paralegals are also discounted by 10% from the standard hourly billing rates charged as of 2011.

5 The McKenna Firm's hourly rates for its attorneys and paralegals increased in 2012, 2013,
6 and 2014 but the McKenna Firm continues to bill for the services rendered in this receivership at
7 a 10% discount off the 2011 billing rates for those attorneys and paralegals. The Receiver
8 submits the fees and expenses are reasonable in light of the services rendered and the results
9 obtained, and that the fees and expenses requested should be awarded in their entirety.

10 **IV. NOTICE OF THIS MOTION IS SUFFICIENT UNDER THE CIRCUMSTANCES**
11 **AND SHOULD BE APPROVED**

12 Local Civil Rule 66-5 provides for service of notice of the hearing on various motions by
13 a Receiver concerning the administration of the estate. That rule provides for service of the
14 notice of hearing on such motions on all creditors of the receivership estate. No hearing has been
15 set on this Motion and the provisions of Local Civil Rule 66-5 do not specifically apply.
16 Consistent with the Receiver's practices throughout the case which have previously been
17 approved by the Court, the Receiver has served a notice of filing of the Motion on the parties and
18 on all known non-consumer creditors of the estate to provide them notice and an opportunity to
19 be heard concerning the Motion.

20 In this case, there are believed to be an extremely large number of potential consumer
21 creditors who may have claims against the Receivership Defendants arising out of the business
22 operations of the Receivership Defendants prior to the Receiver's appointment, although the
23 precise number, identity and location of such consumer creditors have not been determined by the
24 Receiver at this time. Given the Receiver's determination that more than \$332.5 million in sales
25 revenues were generated by I Works and the related and affiliated entities, the number of
26 potential consumer creditors is likely in the tens of thousands. It is not realistically possible or
27 beneficial to the estate and its creditors for the Receiver to attempt to identify and serve the
28 potential consumer creditors with notice of this and other similar administrative motions, and the

1 expense and burden on the estate of attempting to effectuate such service would drain the estate's
2 resources and cause undue administrative expense.

3 Based on the foregoing, to the extent that Local Rule 66-5 applies to this Motion, the
4 Receiver seeks an order providing that the notice requirement of that rule shall be deemed
5 satisfied if notice of the filing of the Motion is given by serving copies of all motion papers on the
6 parties to the action and by serving copies of the notice of filing of the motion on all known non-
7 consumer creditors. The Receiver submits that such service provides sufficient notice and an
8 opportunity for hearing to the interested parties and should be approved as adequate. The Court's
9 authority, as a court of equity supervising a federal equity receivership, to issue such an
10 administrative order approving this form of notice has been previously detailed in the Receiver's
11 memoranda supporting many of the Receiver's prior motions and is summarized herein. *See* F.R.
12 Civ. P. 5(a) and (c) (authorizing the court to modify service procedures when numerous
13 defendants are involved in litigation); Local Rule 66-10 (receiver to administer receivership
14 estates "as nearly as may be in accordance with the practice in the administration of estates in
15 Chapter 11 bankruptcy case"); *In re First Alliance Mortgage Co.*, 269 B.R. 428, 442 (C.D. Cal.
16 2001) (referencing in dicta in the court's recitation of facts the bankruptcy court's order limiting
17 notice issued in that case); 11 U.S.C. section 102(1)(A) (defining the phrase "after notice and a
18 hearing" to mean "after such notice as is appropriate in the particular circumstances, and such
19 opportunity for hearing as is appropriate in the particular circumstances"); 11 U.S.C. section
20 105(a) and (d) (granting broad equitable powers to the court to issue orders "necessary or
21 appropriate to carry out the provisions" of title 11 including "prescribing such limitations and
22 conditions as the court deems appropriate to ensure the case is handled expeditiously and
23 economically"); and F. R. Bankr. P. 2002(m) (authorizing the court to enter "orders designating
24 the matters in respect to which, the entity to whom, and the form and manner in which notices
25 shall be sent except as otherwise provided by these rules").

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

V. CONCLUSION

For the foregoing reasons, it is respectfully requested that the Court grant relief as requested in the Motion.

Dated: June 20, 2014

Respectfully submitted,

RANDOLPH L. HOWARD
KOLESAR & LEATHAM, CHTD.

MCKENNA LONG & ALDRIDGE LLP
GARY OWEN CARIS
LESLEY ANNE HAWES

By: /s/ Gary Owen Caris
Gary Owen Caris
Lesley Anne Hawes

Attorneys for Receiver
**ROBB EVANS OF ROBB EVANS &
ASSOCIATES LLC**

1 RANDOLPH L. HOWARD (Nev. SBN 006688)
rhoward@klnevada.com
2 KOLESAR & LEATHAM, CHTD.
400 South Rampart Boulevard, Suite 400
3 Las Vegas, NV 89145
Telephone: (702) 362-7800
4 Direct: (702) 889-7752
Facsimile: (702) 362-9472

5 GARY OWEN CARIS (Cal. SBN 088918)
gcaris@mckennalong.com
6 LESLEY ANNE HAWES (Cal. SBN 117101)
lhawes@mckennalong.com
7 MCKENNA LONG & ALDRIDGE LLP
300 South Grand Avenue, 14th Floor
8 Los Angeles, CA 90071-3124
Telephone: (213) 688-1000
9 Facsimile: (213) 243-6330

10 Attorneys for Receiver
11 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**
12 **LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION,
16
17

18 Plaintiff,

19 v.

20 JEREMY JOHNSON, individually, as officer
of Defendants I Works, Inc., etc., et al.,

21 Defendants.
22
23

Case No. 2:10-CV-02203-MMD-GWF

**DECLARATION OF GARY OWEN
CARIS IN SUPPORT OF MOTION FOR
ORDER (1) APPROVING AND
AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS'
FEES AND EXPENSES FROM
DECEMBER 1, 2013 THROUGH APRIL
30, 2014; AND (2) GRANTING RELIEF
FROM LOCAL RULE 66-5
PERTAINING TO NOTICE TO
CREDITORS**

24
25 I, Gary Owen Caris, declare:

26 1. I am an attorney at law duly licensed to practice before all courts of the State of
27 California and I have been admitted to practice *pro hac vice* before the United States District
28

1 Court for the District of Nevada in the subject litigation. I am a partner in the firm of McKenna
2 Long & Aldridge LLP ("McKenna Firm") and am one of the attorneys primarily responsible for
3 representing Robb Evans of Robb Evans & Associates LLC, the Receiver in this matter
4 ("Receiver"). I have personal knowledge of the matters set forth in this declaration and if I were
5 called upon to testify in these matters, I could and would competently testify thereto.

6 2. This declaration is submitted in support of the Receiver's seventh fee motion. The
7 motion seeks, among other relief, approval and authorization for payment of the Receiver's legal
8 fees and expenses for the five-month period from December 1, 2013 through April 30, 2014
9 ("Expense Period"). The legal fees and expenses incurred during the Expense Period total
10 \$257,002.27, including fees of \$237,243.60 and expenses of \$15,946.46 incurred to the McKenna
11 Firm for a total of \$253,190.06, expenses of the Receiver's local counsel in Nevada, Kolesar &
12 Leatham, Chtd. ("Kolesar Firm"), in the sum of \$507.64, and fees of \$2,446.25 and expenses of
13 \$858.32 for the total sum of \$3,304.57 for the services of the Receiver's special litigation counsel
14 in Utah, Hatch, James & Dodge, P.C. ("Hatch Firm").

15 3. The McKenna Firm is lead counsel for the Receiver in this case. The McKenna
16 Firm and the Kolesar Firm coordinated their activities so that the Kolesar Firm as local counsel
17 was primarily responsible for assisting the Receiver in obtaining copies of pleadings from the
18 Court, assisting the Receiver in filing and service of pleadings and assisting the McKenna Firm in
19 complying with the Court's local rules and procedures. The amounts incurred to the Kolesar
20 Firm for these services over the Expense Period have been very modest. The Hatch Firm is
21 located in Salt Lake City, Utah. During this Expense Period, the Hatch Firm has assisted the
22 Receiver in connection with a production of tangible things, specifically precious metals, by a
23 third party pursuant to subpoena. The Hatch Firm supervised the on-site production of the
24 precious metals, including the inventory and appraisal of same. The precious metals were
25 originally scheduled to be produced in February 2014, and the production had to be rescheduled
26 when the witness failed to appear despite service of a subpoena. In addition, the Hatch Firm has
27 provided the Receiver advice and assistance in addressing the acreage owned by Paradise Ranch
28 Development, LLC located in Hurricane, Utah, including addressing an extension of the date for

1 tenants to vacate the property based on the pendency of the motion to approve the Receiver's
2 proposed settlement with the Peterson Parties which has not been resolved.

3 4. Attached to the Appendix of Exhibits as Exhibits 7 through 11, inclusive, are true
4 and correct copies of the detailed, redacted time records of the McKenna Firm for the Expense
5 Period. Attached to the Appendix of Exhibits as Exhibits 12 and 13, respectively, are the billing
6 records of the Kolesar Firm and the Hatch Firm for the Expense Period. The time records,
7 Exhibits 7 through 13, as well as the time records for the Receiver, his deputies, accountants and
8 staff, have been redacted by my firm where appropriate to preserve descriptions containing
9 confidential, sensitive, tactical, strategic, attorney-client privileged and/or attorney work-product
10 information. In particular, as detailed in the fee motion, the Receiver is still investigating a large
11 number of entities and individuals comprising and/or associated with the Receivership
12 Defendants, and the Receiver has redacted information in the time entries that the Receiver deems
13 confidential or sensitive, tactical or strategic information related to his ongoing investigation and
14 potential litigation activities that could be compromised if disclosed at this time.

15 5. The McKenna Firm was primarily responsible for implementing the Todd Vowell
16 Parties Settlement and the Receiver's settlement with Virgin Properties, LLC, Liahona Academy
17 for Youth, LLC and Executive Car Sales, Inc. (collectively the "Virgin Properties Group") after
18 the Court issued its order approving those settlements in December 2013. The implementation of
19 the Todd Vowell Parties Settlement and the related Virgin Properties Group Settlement required
20 many activities by the Receiver and counsel. In addition to the settlement agreements
21 themselves, there were sixteen additional documents prepared or revised by my firm and to be
22 executed by the parties, including a promissory note, modification to a promissory note, multiple
23 deeds of trust, multiple grant deeds, multiple subordination, non-disturbance and attornment
24 agreements and multiple withdrawals of lis pendens. Numerous documents were to be recorded
25 and required title insurance for the estate's interests in the properties being transferred to the
26 estate and/or deeds of trust and other recorded interests obtained by the estate. My firm was
27 primarily responsible for addressing title insurance issues with the title company which assisted in
28 the recording of many of the documents.

1 6. With respect to the Todd Vowell Parties' appeal, my firm obtained extensions of
2 the deadline to file the Receiver's Respondent's Brief in light of the pending settlement with the
3 Todd Vowell Parties. I thereafter sought an additional extension of the filing deadline based on
4 the pending motion for approval of the settlement. After the Court approved the Todd Vowell
5 Parties Settlement in December 2013, the Todd Vowell Parties dismissed their appeal of the
6 Clarifying Order with prejudice.

7 7. The appeal of the Clarifying Order by Sharla Johnson, Zibby, Zibby Flight,
8 Orange Cat, Fielding and by the Fielding-related entities Anthon Holdings, Network Agenda,
9 SLI, Trigger, iPrerogative and Rotortrends involved numerous persons and entities as to which
10 different evidence was presented in this Court in support of the entry of the order and different
11 grounds supported the Court of Appeals affirming the Court's ruling. The Sharla Johnson-related
12 appellants filed extensive opening and reply briefs, citing dozens of authorities, as well as
13 extensive excerpts of record that both the Receiver and the FTC nevertheless supplemented with
14 their respective respondent's briefs. The Fielding-related appellants filed their own separate
15 appellant's brief and excerpts of record.

16 8. As lead counsel for the Receiver, I argued the two appeals on behalf of the
17 Receiver in the Ninth Circuit. My preparation for oral argument in the Ninth Circuit required
18 extensive work during this Expense Period. I had to review all briefing by the parties and the
19 key authorities cited in the briefs. I had to anticipate potential areas of questioning and coordinate
20 oral argument with the FTC, since the Court's instructions prior to the hearing required the
21 Receiver and the FTC to divide the 15 minutes in allotted time between the two counsel for the
22 respondents.

23 9. Although a total of 30 minutes was scheduled for the oral argument, the Sharla
24 Johnson and Fielding appeals were set near the end of the morning court calendar, and oral
25 argument allowed by the Court exceeded the time allotted to each side. On April 8, 2014, the
26 Ninth Circuit issued its decision affirming the Clarifying Order as to all appellants.

27 10. During the current Expense Period, my firm prepared and filed five motions for
28 approval of sales of real property assets on behalf of the Receiver. My firm also prepared and

1 filed a motion for approval for the Receiver to conduct a public auction of the "Animal House"
2 houseboat. Defendant Jeremy Johnson opposed one of these six sale motions, and my firm
3 prepared and filed a reply to that opposition. Two of the real property sale motions as well as the
4 motion to sell the Animal House houseboat have been granted.

5 11. My firm prepared and filed three additional motions during the Expense Period,
6 including a motion by the Receiver for authorization from the Court to take possession, custody
7 and control of the Johnson house located at 529 S. Woodsvie Circle, a motion to approve a
8 stipulation for turnover of additional funds by the Federal Deposit Insurance Corporation from
9 accounts at SunFirst Bank, and a fee motion.

10 12. My firm also prepared oppositions and responses to four motions filed by Jeremy
11 Johnson. Those motions included a motion by Johnson to "release" the Paradise Ranch property
12 from the receivership estate, two motions to strike declarations by the Receiver and counsel in
13 support of the Receiver's motion for authorization to take possession of the 529 S. Woodsvie
14 property, and a motion to replace the Receiver's real estate sales agent, James Fales.

15 13. The Receiver previously filed suit against numerous third parties arising out of a
16 fraudulent scheme perpetrated by Sole Group, LLC ("Sole Group") and Arvin Lee Black, Jr.
17 ("Black") by which millions of dollars in receivership assets were transferred to Black and Sole
18 Group (Case No. 2:12-cv-01860-MMD-GWF). The Receiver asserted fraudulent transfer claims
19 against Black, his spouse Atia Black, and Sole Group and a declaratory relief claim against the
20 remaining defendants to attempt to sort out the rights, claims and interests the estate and those
21 parties have in any assets of Black, Atia Black and Sole Group in light of the Black/Sole Group
22 fraudulent scheme. Black entered into a plea agreement in a criminal indictment against him in
23 federal court in Utah arising out of the fraudulent scheme.

24 14. During the Expense Period, the Receiver completed discussions with the non-
25 defaulted parties to the Black/Sole Group action and entered into a stipulation which resolves the
26 action in its entirety as to the non-defaulted parties. The Court recently approved the stipulation
27 and entered the order resolving the matter as to the non-defaulted parties. During the Expense
28 Period, the Receiver prepared and filed an application for entry of default judgments against

1 Black and Sole Group which are pending before the Court. The Receiver has dismissed his
2 claims against Todd Vowell, Kombi Capital, Fishhook Partners and Paydirt Capital, Inc. pursuant
3 to the Todd Vowell Parties Settlement.

4 15. I conducted two depositions during this Expense Period on behalf of the Receiver,
5 specifically depositions of Jeremy Johnson and Duane Fielding. Both of the depositions were
6 conducted in St. George, Utah. The depositions were taken on consecutive days to minimize
7 travel expenses.

8 16. The depositions required significant preparation. The deposition of Jeremy
9 Johnson, a copy of the transcript of which is on file with the Court, focused on investigating
10 multiple assets that the Receiver contends may constitute receivership property based on the
11 source of funding and circumstances surrounding their acquisition and/or disposition. The
12 deposition of Duane Fielding addressed two aircraft titled to Rotortrends and the insurance
13 proceeds related to one of those aircraft. The Receiver's investigation into these assets is
14 continuing.

15 17. The Receiver's deposition of Johnson was not concluded, and I requested in
16 writing that Johnson arrange to appear for his continued deposition. After the exchange of
17 several e-mails, Johnson agreed, and a deposition date in April 2014 was scheduled by the parties.
18 I had to postpone that deposition because of an urgent issue that arose in another matter, and
19 despite his prior agreement to appear, Johnson later refused to agree to appear for a rescheduled
20 deposition date. After the end of the Expense Period, my firm filed a motion to compel Jeremy
21 Johnson to appear for his continued deposition which is scheduled for hearing before Magistrate
22 Judge Foley on July 2, 2014.

23 18. My firm attempted to serve Ryan Anderson with a deposition subpoena. Ryan
24 Anderson is a friend of Johnson's and is affiliated with the company LandTrends which provides
25 landscaping services for the 529 S. Woodsvew property. Despite many attempts to serve the
26 subpoena, our process server was not able to serve the prospective witness. The Receiver will
27 continue to seek his deposition at a later date.

28

1 19. My firm served a subpoena for the production of tangible things on Success
2 Multimedia, LLC located near Salt Lake City, Utah. The subpoena required the production of
3 certain precious metals by that entity so that they could be inspected, inventoried and appraised.
4 My firm obtained an appraiser to conduct the inspection, which was supervised by the Receiver's
5 local counsel, the Hatch Firm. My firm later made demands on Success Multimedia, LLC for
6 additional information and production of what the Receiver believes to be the additional precious
7 metals that should have been included in the production. The Receiver is developing strategies to
8 address Success Multimedia's failure to comply with those demands.

9 20. My firm also performed a number of other legal activities during this Expense
10 Period. My firm responded to inquiries received from creditors and others, including taxing
11 authorities, filed notices of pending actions to protect real estate assets if deemed appropriate, and
12 also performed numerous other tasks in advising the Receiver and rendering services as
13 Receiver's counsel to protect the estate, pursue claim enforcement, negotiate with various persons
14 and entities that are the subject of potential claims by the Receiver, enforce the Preliminary
15 Injunction and otherwise advance the interests of the estate.

16 21. The costs incurred by the McKenna Firm consist primarily of costs incurred for the
17 transcripts of the depositions and travel for those depositions, process server fees for service of
18 subpoenas, reproduction costs for service of pleadings and research. These expenses are out-of-
19 pocket expenses incurred by the McKenna Firm to third parties and passed through to the
20 Receiver without mark up or modification.

21 22. The rates charged by the McKenna Firm for its attorneys and paralegals are
22 discounted by 10% from the standard hourly billing rates charged as of 2011. The McKenna
23 Firm's hourly rates for its attorneys and paralegals generally increased in 2012, 2013 and 2014,
24 but the McKenna Firm continues to bill for the services rendered in this receivership at a 10%
25 discount off the 2011 billing rates for those attorneys and paralegals.

26 23. I am a partner of the McKenna Firm and am familiar with the methods and
27 procedures used to create, record and maintain billing records for the firm's clients. The billing
28 summaries attached to the Appendix of Exhibits as Exhibits 7 through 11, inclusive, are prepared

1 from computerized time records prepared contemporaneously with the services rendered by each
2 attorney and paralegal billing time to this matter. These computerized records are prepared in the
3 ordinary course of business by the attorneys and paralegals employed by the firm who have a
4 business duty to accurately record their time spent and services rendered on the matters on which
5 they perform work. The time records are transferred into a computerized billing program that
6 generates monthly invoices under the supervision of the firm's accounting department. Based
7 upon my experience with the firm, I believe the McKenna Firm's methods and procedures for
8 recording and accounting for time and services for its clients are reliable and accurate.

9 24. I have over 34 years' experience as a business and commercial litigator and also
10 have extensive experience as a bankruptcy attorney representing creditors in Chapter 11 and
11 Chapter 7 bankruptcy cases. For more than fifteen years I have also specialized in representing
12 receivers in federal equity receiverships. I believe my firm's rates and the amount incurred by the
13 Receiver for the services rendered during the Expense Period are reasonable and appropriate
14 based on the nature of the services rendered, the quality and amount of services provided, the
15 complexity of the issues involved and other factors under the circumstances, including the results
16 obtained.

17 I declare under penalty of perjury that the foregoing is true and correct and that this
18 declaration was executed this 20th day of June 2014 at Los Angeles, California.

19
20 /s/ Gary Owen Caris
21 GARY OWEN CARIS
22
23
24
25
26
27
28

1 RANDOLPH L. HOWARD (Nev. SBN 006688)
rhoward@klnevada.com
2 KOLESAR & LEATHAM, CHTD.
400 South Rampart Boulevard, Suite 400
3 Las Vegas, NV 89145
Telephone: (702) 362-7800
4 Direct: (702) 889-7752
Facsimile: (702) 362-9472

5 GARY OWEN CARIS (Cal. SBN 088918)
gcaris@mckennalong.com
6 LESLEY ANNE HAWES (Cal. SBN 117101)
lhawes@mckennalong.com
7 MCKENNA LONG & ALDRIDGE LLP
300 South Grand Avenue, 14th Floor
8 Los Angeles, CA 90071-3124
9 Telephone: (213) 688-1000
Facsimile: (213) 243-6330

10 Attorneys for Receiver
11 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**
12 **LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION,
16
17 Plaintiff,

18 v.

19 JEREMY JOHNSON, individually, as officer
20 of Defendants I Works, Inc., etc., et al.,

21 Defendants.
22
23
24

Case No. 2:10-CV-02203-MMD-GWF

**DECLARATION OF BRICK KANE IN
SUPPORT OF MOTION FOR ORDER (1)
APPROVING AND AUTHORIZING
PAYMENT OF RECEIVER'S AND
PROFESSIONALS' FEES AND
EXPENSES FROM DECEMBER 1, 2013
THROUGH APRIL 30, 2014; AND (2)
GRANTING RELIEF FROM LOCAL
RULE 66-5 PERTAINING TO NOTICE
TO CREDITORS**

25
26 I, Brick Kane, declare:

27 1. I am the President and Chief Operating Officer of Robb Evans & Associates LLC
28 and a deputy to the Receiver Robb Evans of Robb Evans & Associates LLC ("Receiver"), the

1 Receiver over the Corporate Defendants as defined in the Preliminary Injunction Order and
2 Clarifying Order, defined below, and over the assets of Jeremy Johnson ("Johnson") (collectively
3 the Corporate Defendants and Johnson are referred to herein as the "Receivership Defendants"). I
4 am one of the members of Robb Evans & Associates LLC with primary responsibility for the
5 daily administration, supervision and management of the receivership estate. I have personal
6 knowledge of the matters set forth in this declaration or I have gained knowledge of these matters
7 through other members and deputies of the Receiver during my supervision and management in
8 this matter. If called upon to testify as to these matters I could and would competently testify
9 thereto.

10 2. The Receiver was appointed originally as temporary receiver pursuant to the
11 Court's Order (Doc. No. 19) ("TRO") issued January 13, 2011. Thereafter, pursuant to the Court's
12 Preliminary Injunction Order issued February 10, 2011, the Receiver became permanent receiver
13 in this matter.

14 3. I am one of the deputies to the Receiver who has been responsible for the
15 supervision and administration of the receivership estate and for the Receiver's review and
16 investigation of assets and analysis of financial and business records relevant to the receivership
17 and the Receiver's exercise of his powers and duties under the TRO and Preliminary Injunction
18 Order. I personally participated in the preparation and review of the Receiver's initial Report of
19 Temporary Receiver's Activities January 13, 2011 Through February 4, 2011 which was filed
20 with the Court on February 8, 2011 (Doc. No. 127) ("First Report") and the Report of Receiver's
21 Financial Reconstruction dated January 31, 2012 ("Second Report") filed with the Court on
22 February 3, 2012 along with four volumes of Appendices of Exhibits to the Second Report (Doc.
23 Nos. 464, 465-468). I personally participated in the review and evaluation of many of the
24 documents and records upon which the information contained in the Receiver's First Report and
25 Second Report are based. I attended and/or read the transcripts of all of the depositions
26 conducted by the Receiver to date in this case and I attended two confidential witness interviews
27 on behalf of the Receiver. I was extensively involved in the drafting and revision of the Second
28

1 Report and in the drafting, revisions or review of the more than 100 tabs (exhibits) to the Second
2 Report.

3 4. The Receiver's First Report reported on the Receiver's initial findings and
4 investigation into I Works and \$50.4 million in net profits transferred from the I Works enterprise
5 to or for the benefit of Jeremy Johnson. The Second Report was filed on February 3, 2012 and
6 detailed an additional \$51.4 million in funds from payment processing transferred to or for the
7 benefit of Jeremy Johnson through a complex web of entities and persons. The result of these
8 transfers was that valuable assets of the receivership estate were concealed from the Receiver and
9 hidden apparently to try to remove them from the reach of the Receiver and the creditors of
10 Jeremy Johnson and the other named Receivership Defendants. Based on the Receiver's findings
11 in the Second Report and his ongoing investigation, the Receiver filed a Motion to Clarify to
12 confirm the status of those numerous entities and assets nominally held by third parties but
13 beneficially owned and controlled by Jeremy Johnson. The Motion to Clarify was granted by the
14 Court after extensive briefing, evidence and oral argument conducted on March 19, 2013 through
15 the Order Granting Motion for Order Clarifying Preliminary Injunction Order and for Further
16 Instructions Regarding Scope of Receivership Defendants under Preliminary Injunction Order
17 and Report of Receiver's Financial Reconstruction and Granting Relief from Local Rule 66-5
18 Pertaining to Notice to Creditors After Hearing ("Clarifying Order") entered March 25, 2013.
19 Substantial activities of the Receiver and his counsel during this Expense Period have involved
20 further investigation and location of receivership assets, the disposition of receivership assets, and
21 the implementation of the Court's Clarifying Order.

22 5. Total funds collected during this period from all sources were \$827,721.18. Total
23 receipts during the case exceed \$19.2 million as of the end of the current Expense Period. After
24 the end of the current Expense Period, the estate also recovered an additional \$625,000 pursuant
25 to a settlement with Destiny Davis approved by the Court based on an emergency motion filed by
26 the Receiver in May 2014, bringing total receipts in the case to over \$19.8 million.

27 6. This declaration is submitted in support of the Receiver's seventh fee motion. The
28 Receiver seeks payment of the Receiver's fees and expenses summarized in the Administrative

1 Expenses and Fund Balance spreadsheet (“Financial Summary”) attached hereto as Exhibit 1 and
2 detailed in the redacted billing summaries which are attached as Exhibits 2 through 6 in the
3 Appendix of Exhibits filed in support of this motion as well as the Receiver’s counsel’s fees and
4 expenses described in the accompanying Declaration of Gary Owen Caris and Exhibits 7 through
5 13 of the Appendix of Exhibits in support of the current fee motion. The Receiver seeks an order
6 approving and authorizing payment of receivership fees and expenses incurred for the period
7 from December 1, 2013 through April 30, 2014 (“Expense Period”), including payment of the
8 fees of the Receiver, the Receiver’s deputies, agents, staff and professionals, and reimbursement
9 of costs incurred during the Expense Period in the total sum of \$350,026.78. The fees of the
10 Receiver, his deputies, agents and staff total \$71,377.57 and the Receiver’s expenses total
11 \$21,646.94 during the Expense Period. During the Expense Period, the Receiver has incurred
12 fees for the Receiver and his deputies of \$34,287.10, Senior Staff fees of \$33,432.10, Information
13 Technology fees of \$2,323.07, and Support Staff fees of \$1,335.30. The Receiver’s expenses
14 during the Expense Period primarily consisting of expenses for investigative search costs and
15 expenses to obtain production of documents from third parties.

16 7. The Receiver’s legal fees and expenses total \$257,002.27 during the Expense
17 Period, including fees and expenses incurred to the Receiver’s lead counsel McKenna Long &
18 Aldridge LLP in the sum of \$253,190.06, expenses of the Receiver’s local counsel in Nevada,
19 Kolesar & Leatham, Chtd., in the sum of \$507.64, and fees and expenses of the Receiver’s special
20 litigation counsel in Utah, Law Offices of Hatch, James & Dodge, A Professional Corporation, in
21 the sum of \$3,304.57. Many of the costs incurred during the five months of this Expense Period
22 by both the Receiver and the McKenna Firm pertain to the Receiver’s asset-related discovery and
23 investigation. The Financial Summary attached hereto as Exhibit 1 summarizes the categories of
24 expenses incurred in connection with the Receiver’s activities and services.

25 8. This receivership involves an extremely complex web of corporate and other
26 entities and is exceptionally complicated from an accounting standpoint. The receivership estate
27 is also complex because of the large number and varied nature of the assets subject to the
28 Receiver’s administration.

1 9. During the Expense Period, the Court issued an order approving the Receiver's
2 settlement with the Todd Vowell Parties and the related settlement with Virgin Properties, LLC
3 ("Virgin Properties"), Liahona Academy for Youth, LLC ("Liahona Academy for Youth"), and
4 Executive Car Sales, Inc. ("Executive Car Sales") (collectively referred to herein as the "Virgin
5 Properties Group"). The implementation of the settlements involved significant legal work to
6 complete and execute all of the related transactional documents, including a note, deeds of trust,
7 grant deeds and other documents. The implementation of the settlements also involved the
8 Receiver's calculation of payments and monitoring of receipt of funds from the settling parties.

9 10. During the current Expense Period, the Receiver filed multiple motions for
10 approval of sales of real properties concerning properties which the Receiver had been previously
11 granted the right to list and market. Two of the four motions have been granted, with orders
12 entered by the Court authorizing the Receiver to sell the Arrowhead Trail residence and the two
13 vacant lots located in Chamberlain Ranch. Those sales have closed, and the net proceeds in the
14 aggregate sum of over \$412,000 have been paid to the receivership estate. The other two sale
15 motions involving the Boulder Mountain Property and a condominium located in Salt Lake City
16 have not been opposed and remain pending for Court determination.

17 11. The Receiver filed an additional motion to authorize the Receiver to sell the real
18 property located at 2988 Kings Court Lane to a third party. The Kings Court Property was the
19 former residence of defendant Loyd Johnston, as to which the receivership estate held a deed of
20 trust and on which the Receiver completed a foreclosure, taking title to the property on behalf of
21 the estate. The buyer of the Kings Court Property had designated the property as the downleg of
22 her 1031 tax-free exchange, and because of a tax lien on the Kings Court Property, the Receiver
23 had to delay seeking approval of the sale of that property until the redemption period had passed.
24 The Receiver's counsel filed an emergency motion to approve the sale, and defendant Jeremy
25 Johnson filed an opposition to the motion to which the Receiver filed a reply. The Court granted
26 the Receiver's motion to approve that sale, and the estate obtained net sale proceeds of
27 \$240,979.03 from the sale.

28

1 12. The Receiver has also administered and attempted to sell a houseboat located on
2 Lake Powell known as the "Animal House" pursuant to a prior order of the Court issued in
3 August 2011. After attempting to market the houseboat through a private broker for over two
4 years without success, the Receiver filed a motion for authorization to conduct a public auction of
5 the houseboat, which was unencumbered. The Court granted the Receiver's motion, and the
6 houseboat was recently sold at auction, with the estate expected to receive net proceeds from the
7 sale in excess of \$100,000 after commissions.

8 13. With respect to the Paradise Ranch property located in Hurricane, Utah, in a prior
9 expense period the Receiver filed a motion for approval of a settlement with Brent and Loretta
10 Peterson and Paradise Ranch Development, LLC (Utah) ("Peterson Parties") regarding that
11 property (Doc. No. 1198). The motion was opposed by defendant Jeremy Johnson. Later,
12 Johnson filed a motion to "release" the Paradise Ranch property from the receivership estate and
13 sell it to Johnson or an investment group with which he was affiliated. During this Expense
14 Period, the Receiver filed an opposition to Johnson's motion to release Paradise Ranch from the
15 receivership. Both motions remain pending, and while those motions are pending, the Receiver
16 has continued to collect rents from the tenants at the property, has extended the vacate dates for
17 the tenants and has continued to administer that asset while the Court considers the motions.

18 14. Another motion filed in a prior expense period that remains pending is the
19 Receiver's motion for approval of proposed sales of the Three Woodsvie Properties (Doc.
20 No.1189) ("Woodsvie Sale Motion"). The Woodsvie Sale Motion was opposed by Jeremy
21 Johnson. That motion has been fully briefed and is subject to determination by the Court. The
22 Receiver was contacted by the proposed buyers of the Three Woodsvie Properties who
23 indicated that they were likely to terminate the sale contracts and forfeit their deposits to the
24 estate, and the Receiver filed a pleading so advising the Court during this Expense Period.

25 15. The sales of assets have required the Receiver and his counsel to work together on
26 the documentation and review of the sale agreements, address issues in the preliminary title
27 reports and address the appropriate terms and conditions of the sales which vary depending on the
28 circumstances of the sale, the nature of the asset, and time constraints that may affect the sale.

1 The sales also require discussions, negotiation and coordination by the Receiver and/or his
2 counsel with the buyer or the buyer's attorney or sales agent as well as any broker for the estate,
3 as applicable.

4 16. During the current Expense Period, the Receiver also filed a motion asking the
5 Court for permission to take possession, custody and control of Johnson's residence located at 529
6 S. Woodsvie Circle. The grounds for the motion included the fact that Sharla Johnson and her
7 children had moved out of the property and that the Johnsons were allowing a commercial
8 enterprise, specifically a retreat facility, to use the property for its commercial purposes and that
9 third parties were occupying the premises in connection with that commercial activity. Johnson
10 vigorously opposed that motion, and the Receiver filed detailed reply papers. Thereafter, Johnson
11 filed a series of motions to which the Receiver had to respond, including two separate motions to
12 strike the declarations of the Receiver's sales agent, James Fales, and the Receiver's counsel, Gary
13 Owen Caris, and a motion to replace Fales as the Receiver's broker. Those motions, along with
14 the Receiver's motion to take custody, control and possession of the 529 S. Woodsvie property,
15 are also pending.

16 17. The Receiver made repeated demands on defendant Fielding and counsel for
17 Rotortrends for compliance with the Clarifying Order and Preliminary Injunction. The Receiver's
18 demands were met with a refusal to turn over the 1996 Robinson helicopter and the amount of
19 insurance proceeds Fielding obtained for another aircraft. Fielding and Rotortrends failed to
20 comply with the Receiver's turnover demands, and the 1996 Robinson helicopter was destroyed in
21 a crash. The Receiver is continuing to investigate the disposition of insurance proceeds from
22 these aircraft and is evaluating the estate's potential claims against Fielding and others associated
23 with Rotortrends, including its counsel.

24 18. The Receiver's services and those of its counsel include numerous other
25 administrative and legal activities during this Expense Period. The Receiver's deputies and staff
26 respond to and cooperate with law enforcement inquiries and activities as required under the
27 Preliminary Injunction. The Receiver's deputies and staff respond to inquiries from creditors,
28 taxing authorities and others, prepare and reconcile the Receiver's accounting records for the

1 case, address tax issues concerning the estate, deal with banks and other financial institutions
2 which may have receivership funds or documentation for accounts of Receivership Defendants
3 and perform other similar administrative tasks. The Receiver through counsel provides copies of
4 the monthly bank statements to the parties pursuant to the Preliminary Injunction. The Receiver
5 maintains and updates creditor lists for the case. The numerous and varied issues that arise in the
6 supervision and administration of the estate by the Receiver are reflected in the billing records of
7 the Receiver and counsel filed in support of this Motion.

8 19. The billing rates charged in this case reflected in the billing records filed in
9 support of the Motion for the Receiver, the Receiver's members and senior accounting staff are
10 discounted at 10% from the rates charged by the Receiver's firm in private sector cases as of the
11 time of the Receiver's appointment. Because the Receiver does not raise the rates charged for its
12 professionals during the case, and because the Receiver established discounted rates in this case
13 based on its 2010 private sector rates even though the Receiver did not commence work until
14 January 2011, the rates being charged for the Receiver, the Receiver's members and senior
15 accounting staff are not only 10% below the firm's current 2014 rates but overall the rates in
16 effect in this case are discounted materially more than 10%.

17 20. In this case, there are an unknown but believed to be a very large number of
18 consumer creditors who may have claims against the Receivership Defendants arising out of the
19 business operations of the Receivership Defendants prior to the Receiver's appointment. The
20 identity and location of such consumer creditors have not been determined by the Receiver at this
21 time. Given the Receiver's determination that more than \$332.5 million in sales revenues was
22 generated by I Works and the related and affiliated entities, the amount of consumer creditors
23 could number in the tens of thousands. It is not realistically possible or beneficial for the estate
24 for the Receiver to attempt to serve the potential consumer creditors with this and other similar
25 administrative motions, and the expense and burden on the estate of attempting to effectuate such
26 service would drain the estate's resources and cause undue administrative expense.

27 21. As a member of Robb Evans & Associates LLC, I am familiar with the methods
28 and procedures used by the Receiver and his staff and employees to record the time spent

1 rendering services to receivership estates over which Robb Evans or Robb Evans & Associates
2 LLC have been appointed. The records included as Exhibits 2 through 6 of the Appendix of
3 Exhibits filed in support of this motion are regularly prepared by the members, staff and
4 employees of Robb Evans & Associates LLC at or about the time of the services rendered and
5 each of whom has a business duty to accurately record the information regarding their services set
6 forth in these records. The records are reviewed by the Receiver's accounting staff and
7 summarized in the Receiver's Financial Summary, Exhibit 1 attached hereto. Based upon my
8 experience with Robb Evans & Associates LLC, I believe the Receiver's methods and procedures
9 for recording and accounting for time and services for the receivership estates over which Robb
10 Evans or Robb Evans & Associates LLC have been appointed are reliable and accurate.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed this 9 day of June 2014 at Sun Valley, California.

13 
14 _____
15 BRICK KANE
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1

EXHIBIT 1

Robb Eyzas & Assoc LLC, Receiver of IWorks Inc.
 Administrative Expense and Fund Balance
 From Inception (January 13, 2013) to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
Motion to Clarify/Exhibit A Ass									
Corporate Bank Accounts									
COPO Administration LLC	137.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	137.00
DBA Somebesch	12.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12.90
Dudley Group/Elite Debit	0.00	0.00	15,021.93	0.00	0.00	0.00	0.00	15,021.93	15,021.93
EZ Living RV Park	397.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	397.66
Fishhook Partners LLC	136.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	136.85
Fiadine Investments LP	31.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31.00
Kats LLC	1,374.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,374.97
Kombi Capital LP	515.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	515.51
Lishona Holdings	29.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	29.59
Online Weight Loss	19.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19.33
Paradise Ranch Development LLC	3,011.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,011.24
Paydirt LP	127.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	127.93
Paydirt Properties LLC	174.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	174.00
Powder Monkeys	99,883.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	99,883.00
Rotorheads Inc.	8,198.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,198.17
SRLA Association	38.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	38.00
Sumneret Ranch LLC	77.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	77.09
T Aggeret Management LLC	90.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	90.04
TODCO Services LLC	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00
Treadstone Partners LP	191.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	191.55
Triple Seven, L.P.	0.00	35,347.18	0.00	0.00	0.00	0.00	0.00	0.00	35,347.18
Total Corporate Bank Accounts	114,545.83	35,347.18	15,021.93	0.00	0.00	0.00	0.00	15,021.93	164,914.94
127 Hollister St. SMA, CA - Sale	1,292,745.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,292,745.70
620 E. Main Insurance Payment	94,983.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	94,983.56
620 E. Main St. Rockville- Sale	0.00	149,196.49	0.00	0.00	0.00	0.00	0.00	0.00	149,196.49
647 Arrowhead Trail - Sale	0.00	0.00	0.00	390,957.93	0.00	0.00	0.00	390,957.93	390,957.93
2988 S Kings Ct-Sale	0.00	0.00	0.00	0.00	0.00	240,979.03	0.00	240,979.03	240,979.03
Chamberlain Ranch Lot Sales	0.00	0.00	0.00	32,055.60	0.00	0.00	0.00	32,055.60	32,055.60
J. Haden Loan	1,500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,500.00
J. Haden Settlement	65,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65,000.00
Mountain Financial LLC	26,000.00	26,000.00	6,500.00	6,500.00	6,500.00	6,500.00	6,500.00	32,500.00	84,500.00
Folkertus/PD/C Order Proceeds	0.00	6,812,227.82	0.00	0.00	0.00	0.00	0.00	0.00	6,812,227.82
Sumneret Settlement	0.00	0.00	0.00	22,085.62	0.00	0.00	0.00	22,085.62	22,085.62
Touchpoint Stipulation	0.00	74,518.76	0.00	0.00	0.00	0.00	0.00	0.00	74,518.76
Rental Receipts									
5 S 500 W #1106 Rent Receipts	1,200.00	2,400.00	600.00	600.00	600.00	600.00	0.00	2,400.00	6,000.00
505 Woodview Circle Deposit	2,500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,500.00
505 Woodview Cir Rent	4,500.00	3,723.58	0.00	0.00	0.00	0.00	0.00	0.00	8,223.58
647 Arrowhead Rent Receipts	5,462.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,462.80
EZ Livin Rent Receipts	29,227.00	23,322.00	5,343.00	6,383.00	5,963.00	5,723.00	6,093.00	29,305.00	82,054.00

Robb Eyma & Assoc LLC, Receiver of iWorks Inc
Administrative Expense and Fund Balance
 From inception (January 1, 2013) to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
Pendise Ranch LLC Rent	32,326.72	24,817.50	6,000.00	8,735.00	9,318.00	8,955.00	10,950.00	43,958.00	101,102.22
Total Rental Receipts	75,216.52	54,263.08	11,943.00	15,718.00	15,881.00	15,278.00	17,043.00	75,863.00	205,342.60
Miscellaneous Receipts									
Government Tax Refunds	2.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.02
Miscellaneous Refunds	22.76	0.00	0.00	0.00	0.00	0.00	283.44	283.44	306.20
Sale of Paint Booth	2,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,000.00
Virgin Properties LLC	19,665.94	0.00	0.00	0.00	0.00	5,000.00	5,000.00	10,000.00	29,665.94
Total Miscellaneous Receipts	21,690.72	0.00	0.00	0.00	0.00	5,000.00	5,283.44	10,283.44	31,974.16
Total Motion to Clarify/Exhibit A As	1,691,682.33	7,151,553.33	33,464.93	487,317.15	22,381.00	267,757.03	28,826.44	809,746.55	9,652,982.21
Frozen Corporate Accounts									
American Express Corp Account	49,133.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	49,133.15
Cardify Payment Solutions Inc.	2,410.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,410.45
Cloud Nine Marketing	40,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	40,000.00
Deveret First Credit Union	14,960.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14,960.20
Discover Financial Services	215,814.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	215,814.49
ETrad Financial	471.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	471.45
Hilton Sparkle and Shine LLC	6,838.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,838.25
Kinco Metals Inc.	10,398.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,398.33
Manhuat E-Solutions	5,329.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,329.45
MF Global Inc	35,836.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35,836.38
Mountain America Federal Credit	9,383.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,383.29
PowerPay, LLC	8,836.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,836.76
Sun First Bank 121003347	16,008.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16,008.44
The Village Bank	109,303.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	109,303.33
US Alliance Group (First Data)	178,397.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	178,397.75
WFB #5172 Elite Debit	1.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.56
Wells Fargo Little CC	136,732.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	136,732.30
WFB 200004-245829 CPA	326.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	326.27
WFB 796-2804824 Zibby	3,916.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,916.67
Zions Bank	16,231.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16,231.58
Other	83,466.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	83,466.01
Total Frozen Corporate Accounts	943,796.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	943,796.11
FDIC SunFirst Account Receipts Settlements/Distributions	1,460,650.27	11,414.52	0.00	0.00	0.00	0.00	0.00	0.00	1,472,064.79
Amber Lyn Shares	10,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,000.00
Backman Ranch LLC Distribution	1,000,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,000,000.00
Cynegy Data Payments									

Robb Evans & Assoc LLC, Receiver of iWorks Inc.
 Administrative Expense and Fund Balance
 From Inception (January 13, 2010) to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
DJM Reserve Funds	1,305,897.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,305,897.48
JRB Reserve Funds	188,924.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	188,924.97
Anthony Holdings Reserve Funds	638,003.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	638,003.87
Jet Processing Reserve Funds	61,544.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	61,544.46
Total Cytogy Data Payments	2,194,370.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,194,370.78
Marathon Investments Inc.	27,835.00	24,792.09	0.00	0.00	9,346.44	0.00	0.00	9,346.44	61,973.53
The Metropolitan Benefit Group	29,510.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	29,510.90
Repayment from Browz LLC	120,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	120,000.00
Total Settlements/Distributions	3,381,716.68	24,792.09	0.00	0.00	9,346.44	0.00	0.00	9,346.44	3,415,855.21
Proceeds From Sale of Assets									
Auction Proceeds	169,922.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	169,922.21
Coin, Metal & Jewelry	393,246.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	393,246.82
Real Property Sale Proceeds									
103 Acres Vacant Land	137,875.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	137,875.02
11 W 700 S Ephraim, UT	253,041.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	253,041.94
575 E 30 N Ephraim, UT	72,102.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	72,102.00
Beryl Vacant Land	3,376.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,376.30
Brockman Mountain LLC	200,629.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200,629.40
Richfield, UT Property	35,982.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35,982.86
Sale of Mendon Trailer Park	236,682.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	236,682.37
Washington County Acreage	321,264.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	321,264.09
Total Real Property Sale Proceeds	1,254,953.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,254,953.98
Sale of Aircraft	1,521,426.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,521,426.61
Sale of Automobiles	42,627.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	42,627.00
Total Proceeds From Sale of Assets	3,382,176.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,382,176.62
New Horizons Finance/Kevin Pilo	134,862.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	134,862.05
SLL LLC	31,558.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31,558.47
Rent Receipts									
392 W 400 S Manui, UT	1,145.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,145.00
43N 100W	600.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	600.00
575 N 30 N Ephraim, UT	3,190.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,190.00
Mendon Court Trailer Park. Rents	43,941.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	43,941.90
Total Rent Receipts	48,876.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	48,876.90
Miscellaneous Income									
COBRA Premiums	4,459.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,459.84

Robb Evans & Assoc LLC, Receiver of IWorks Inc.
Administrative Expense and Fund Balance
 From Inception (January 13, 2010) to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
Commissions	1,464.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,464.31
Insurance Premium Refund	0.00	4,218.00	0.00	0.00	0.00	0.00	0.00	0.00	4,218.00
Petty Cash	121.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	121.00
Refunds	6,694.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,694.90
Tax Refunds	9,952.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,952.85
Other	26,561.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26,561.00
Total Miscellaneous Income	49,253.90	4,218.00	0.00	0.00	0.00	0.00	0.00	0.00	53,471.90
Car Wash Receipts	47,727.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	47,727.06
Interest Income	9,141.46	10,519.72	2,483.46	1,801.68	1,555.04	1,720.03	1,056.98	8,628.19	28,289.37
Total Income	11,181,441.85	7,202,497.66	35,950.39	459,118.83	33,282.48	269,486.06	29,893.42	827,721.18	19,211,660.69
Expense									
Motion to Clarify/Exhibit A Assets									
Virgin River Property									
Title Policy Insurance	0.00	0.00	0.00	0.00	0.00	0.00	1,517.00	1,517.00	1,517.00
Total Virgin River Property	0.00	0.00	0.00	0.00	0.00	0.00	1,517.00	1,517.00	1,517.00
340 N County Ln #29									
Electricity/Sewer	0.00	0.00	0.00	0.00	689.40	0.00	0.00	689.40	689.40
Total 340 N County Ln #29	0.00	0.00	0.00	0.00	689.40	0.00	0.00	689.40	689.40
5 S 500 W #1105									
Locksmith Services	0.00	0.00	0.00	0.00	0.00	0.00	81.42	81.42	81.42
HOA Fees	3,668.91	692.46	230.82	249.00	249.00	249.00	249.00	1,226.82	5,588.19
Lien Related Legal Fees	737.91	0.00	0.00	0.00	0.00	0.00	0.00	737.91	737.91
Lien Related Legal Costs	37.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	37.09
Total 5 S 500 W #1105	4,443.91	692.46	230.82	249.00	249.00	249.00	330.42	1,308.24	6,444.61
505 Woodview Circle									
Cleaning Services	0.00	1,900.00	0.00	0.00	0.00	0.00	0.00	0.00	1,900.00
Electricity/Water/sewer	0.00	0.00	0.00	0.00	985.90	521.79	0.00	1,507.69	1,507.69
Maintenance & Repairs	0.00	1,059.00	0.00	0.00	0.00	0.00	0.00	0.00	1,059.00
Pool Maintenance	0.00	0.00	324.13	148.75	0.00	190.96	0.00	663.86	663.86
Security Deposit Refund	0.00	0.00	0.00	1,500.00	0.00	0.00	0.00	1,500.00	1,500.00
Total 505 Woodview Circle	0.00	2,959.00	324.13	1,648.75	985.90	712.77	0.00	3,671.55	6,630.55
573 S. Woodview Cir.									
Electricity/Water/Sewer	0.00	0.00	5,353.05	760.85	0.00	1,130.97	0.00	7,244.87	7,244.87
Residential Gas	0.00	0.00	136.61	645.15	258.48	0.00	0.00	1,040.24	1,040.24
Total 573 S. Woodview Cir.	0.00	0.00	5,489.66	1,406.00	258.48	1,130.97	0.00	8,285.11	8,285.11

Robb Evans & Assoc LLC, Receiver of [Works Inc.
Administrative Expense and Fund Balance
 From Inception January 13, 2013 to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
647 Arrowhead Dr.									
Oversight Advertising	0.00	0.00	0.00	447.56	0.00	445.86	0.00	893.42	893.42
Pool Maintenance	0.00	0.00	29.75	152.72	0.00	0.00	0.00	182.47	182.47
Gas & Propane	0.00	0.00	39.44	23.40	0.00	0.00	0.00	62.84	62.84
Cleaning Services	0.00	766.68	0.00	0.00	0.00	0.00	0.00	766.68	766.68
Landscape Services	0.00	1,300.00	0.00	0.00	0.00	0.00	0.00	1,300.00	1,300.00
Locksmith Services	0.00	86.00	0.00	0.00	0.00	0.00	0.00	86.00	86.00
Power/Water/Sewer	0.00	50.00	38.17	312.99	361.63	0.00	0.00	712.79	762.79
Total 647 Arrowhead Dr.	0.00	2,202.68	107.36	936.67	361.63	445.86	0.00	1,851.52	4,054.20
1749 E. Boulder Mountain									
Natural Gas	0.00	0.00	0.00	0.00	50.64	145.48	0.00	196.12	196.12
HOA Dues	0.00	395.00	0.00	121.00	0.00	0.00	121.00	240.00	635.00
Electricity	131.00	420.00	89.00	343.09	57.70	60.92	0.00	550.71	1,101.71
Maintenance & repairs	0.00	770.00	0.00	0.00	0.00	0.00	1,070.00	1,070.00	1,840.00
Mortgage Payments	0.00	12,965.40	1,852.20	1,852.20	1,910.34	1,910.34	1,983.62	9,508.70	22,474.10
Security & Alarm	90.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	90.00
Water/Sewer/Garbage	42.11	359.47	58.61	62.86	0.00	55.28	56.46	233.21	634.79
Total 1749 E. Boulder Mountain	263.11	14,905.87	1,998.81	2,378.15	2,018.68	2,172.02	3,230.68	11,788.74	26,971.72
2988 S. Kings Court Lane									
Electricity	0.00	0.00	0.00	311.91	0.00	361.08	0.00	672.99	672.99
Locksmith Services	0.00	155.01	0.00	0.00	0.00	0.00	0.00	155.01	155.01
Pool Maintenance	0.00	626.62	348.69	150.74	0.00	130.67	0.00	630.10	1,256.72
Repairs & Maintenance	0.00	2,761.42	0.00	0.00	0.00	0.00	0.00	2,761.42	2,761.42
Water/Sewer/Garbage	300.00	395.50	116.90	55.05	55.55	59.24	55.55	342.29	1,037.79
Total 2988 S. Kings Court Lane	300.00	3,938.55	465.59	517.70	55.55	550.99	55.55	1,645.38	5,883.93
3265 E. Old Pioneer Rd.									
Property Taxes	579.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	579.67
Total 3265 E. Old Pioneer Rd.	579.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	579.67
EZ Livin MHP									
Church Rental Increase	221.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	221.50
Deposit Refund	200.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200.00
Electricity	2,713.71	2,686.20	753.37	940.71	1,022.88	862.99	641.99	4,223.94	9,623.85
Fees & Permits	526.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	526.54
Garbage & Refuse Services	1,139.99	1,150.80	250.47	318.14	255.47	257.26	267.50	1,346.84	3,639.65
Monthly Sewer Reduction	90.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	90.00
On-Site Manager Fees	2,600.00	2,600.00	650.00	650.00	650.00	650.00	650.00	3,250.00	8,450.00
Monthly Garbage Reduction	125.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	125.00

Robb Evans & Assoc LLC, Receiver of Woods Inc.
 Administrative Expense and Fund Balance
 From Inception January 13, 2013 to April 30, 2014

Component/Defendant Asset Exp.	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
Aircraft Expenses									
Advertising for Sale	9,311.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,311.61
Aircraft Fuel	2,361.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,361.43
Broker Fee	1,595.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,595.30
Insurance Premiums	89,094.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	89,094.00
Registration Fees	6,010.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,010.00
Relocation Services	15,923.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15,923.95
Repairs & Maintenance	166,218.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	166,218.98
Security Guard Services	29,700.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	29,700.00
Storage	28,530.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28,530.12
Title Searches	410.00	0.00	0.00	0.00	0.00	0.00	35.00	35.00	445.00
Total Aircraft Expenses	349,155.39	0.00	0.00	0.00	0.00	0.00	35.00	35.00	349,190.39
Appraisals/B.O.V.									
Annoned Car Service & Storage	44,626.58	2,500.00	2,100.00	0.00	0.00	0.00	0.00	2,100.00	49,226.58
Auction Related Expenses	12,389.96	0.00	0.00	0.00	0.00	1,228.40	0.00	1,228.40	13,598.36
Automobile Expenses	19,300.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19,300.00
Business Taxes	22,919.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22,919.55
Health Insurance Premium	4,140.00	141.00	0.00	0.00	0.00	100.00	0.00	100.00	4,381.00
Houseboat Expenses	168.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	168.54
Boat Moorage	55,478.61	3,818.38	965.04	0.00	964.44	1,945.17	0.00	3,874.65	63,171.64
Insurance Premiums	21,570.00	4,125.00	0.00	0.00	0.00	0.00	0.00	0.00	25,695.00
Maintenance & Repairs	860.75	3,988.29	7,361.74	0.00	0.00	6.00	0.00	7,367.74	12,216.78
Personal Watercraft Insurance	1,165.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,165.25
Secured Lender Loan Payments	63,513.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	63,513.26
Total Houseboat Expenses	142,587.87	11,931.67	8,326.78	0.00	964.44	1,951.17	0.00	11,242.39	165,761.93
Locksmith Services									
New Horizons Finance Inc.	2,075.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,075.44
Office Moveout/Cleaning	1,136.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,136.30
Real Properties									
Mendon Court Trailer Park	1,693.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,693.50
127 Hollister Ave. Santa Monica	21,495.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21,495.75
302 W. Hilton Dr.	26,227.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	26,227.00
43 N 100 E Ephraim, UT	28,016.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28,016.37
11 W 700 S Ephraim, UT	299.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	299.93
529 Wood View Cr. SG, UT	7,778.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,778.63
575 E 30 N Ephraim, UT	23,741.00	6,984.00	3,295.00	0.00	3,295.00	0.00	0.00	6,590.00	36,915.00
620 E. Main Rockville, UT	15,507.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15,507.30
1140 E. Fort Pierce Dr. #36	7,254.11	612.30	0.00	0.00	0.00	0.00	0.00	0.00	7,866.41
249 E. Takemede St. SG, UT	432.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	432.99
1792 S. Blackridge Dr. SG, UT	3,647.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,647.38
	1,659.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,659.00

Robb Evans & Assoc LLC, Receiver of IWorks Inc.
Administrative Expense and Fund Balance
 From inception (January 13, 2010) to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
Consulting Services									
Property Title Searches	2,432.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,432.50
Property & Liability Insurance	6,515.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,515.00
Title Insurance	116,228.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	116,228.29
Total Real Properties	263,941.25	7,196.30	3,295.00	0.00	3,295.00	0.00	0.00	6,590.00	277,727.55
Server Colocation Rent									
Storage Unit Rent	3,690.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,690.00
Total Corporate/Defendant Asset Exp.	6,217.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,217.34
Receiver Fees & Expenses									
Receiver Fees									
Receiver									
R. Evans	3,888.00	97.20	0.00	0.00	0.00	0.00	0.00	0.00	3,985.20
B. Kane	225,750.00	13,225.00	850.00	675.00	1,825.00	475.00	1,375.00	5,200.00	244,175.00
K. Johnson	177,111.90	1,266.30	0.00	94.50	0.00	0.00	1,039.50	1,134.00	179,512.20
V. Miller	203,877.70	19,580.40	4,857.30	7,408.80	4,951.80	6,237.00	3,156.30	26,611.20	252,069.30
S. Kishnani	37.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	37.80
A. Jen	29,994.30	2,438.10	359.10	548.10	94.50	56.70	283.50	1,341.90	33,774.30
Total Receiver	642,639.70	36,607.00	6,066.40	8,726.40	6,871.30	6,768.70	5,854.30	34,287.10	713,553.80
Senior Staff									
M. Lin	189.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	189.00
L. Lee	125,949.60	1,209.60	94.50	75.60	189.00	170.10	56.70	585.90	127,745.10
F. Jen	286,824.50	15,271.20	0.00	0.00	94.50	0.00	2,192.40	2,286.90	314,382.60
P. Chung	691,815.60	52,504.20	7,900.20	1,757.70	3,931.20	1,417.50	774.90	15,781.50	760,101.30
C. Callahan	69,533.10	9,846.90	1,530.90	2,022.30	453.60	907.20	1,171.80	6,063.80	85,465.80
C. DeCilus	107,514.00	11,340.00	3,042.00	1,953.00	1,017.00	1,287.00	828.00	8,127.00	126,981.00
J. Dabbin	35,855.00	470.00	10.00	15.00	5.00	50.00	135.00	215.00	36,540.00
W. Wolf	7,831.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,831.00
N. Wolf	8,775.00	695.00	35.00	45.00	260.00	5.00	5.00	350.00	9,820.00
Total Senior Staff	1,344,286.80	91,336.90	12,612.60	5,868.60	5,950.30	3,836.80	5,163.80	33,432.10	1,469,055.80
Information Technology									
E. Roop	71,300.00	11,887.50	0.00	275.00	225.00	1,025.00	75.00	1,600.00	84,787.50
K. Chapin	4,507.00	632.10	204.06	88.72	190.75	186.31	53.23	723.07	5,882.17
Total Information Technology	75,807.00	12,519.60	204.06	363.72	415.75	1,211.31	128.23	2,323.07	90,668.67
Support Staff									
Total Receiver Fees	2,114,917.30	142,216.40	19,188.16	15,285.52	13,453.45	12,089.61	11,360.83	71,377.57	2,328,511.27

Robb Evans & Assoc LLC, Receiver of Woods Inc.
Administrative Expense and Fund Balance
 From Inception (January 13, 2010) to April 30, 2014

	Previously Reported and Approved	Previously Reported 8/1/13-11/30/13 Pending Approval	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	12/1/13-4/30/14	TOTAL
Receiver Expenses									
Bank & Wire Fees	716.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	716.00
Bond Premiums	300.00	0.00	100.00	0.00	0.00	0.00	0.00	100.00	400.00
Investigative Search Costs	8,952.28	17,045.01	10,150.00	0.00	197.18	0.00	10,347.18	0.00	34,344.47
Occupancy & Equipment Rental	27,491.72	1,571.56	1,498.77	1,184.40	2,318.76	1,977.64	1,797.44	8,777.01	37,840.29
Office Telephone & Supplies	5,674.04	539.53	126.54	113.16	125.04	116.42	75.95	6,790.68	557.11
Postage & Delivery	16,412.35	1,218.30	374.96	146.39	172.52	218.91	70.20	982.98	18,613.63
Retained Employee Services	864.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	864.00
Small Equipment & Supplies	1,576.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,576.72
Subpoena/ Document Reproduction	18,517.46	2,150.93	0.00	0.00	0.00	0.00	0.00	0.00	20,668.39
Tax Return Preparation	63,963.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	63,963.32
Travel Expenses	29,225.27	178.54	0.00	0.00	394.14	488.52	0.00	882.66	30,286.47
Total Receiver Expenses	173,693.16	22,723.87	12,250.27	1,443.95	3,010.46	2,998.67	1,943.59	21,644.94	218,063.97
Legal Fees & Costs									
Hatch, James & Dodge	17,110.50	10,082.50	0.00	200.00	1,211.25	1,085.00	0.00	2,446.25	29,639.25
Legal Fees	769.30	1,832.17	137.19	0.00	1.33	719.80	0.00	838.32	3,459.79
Legal Costs	17,879.80	11,914.67	137.19	200.00	1,212.58	1,754.80	0.00	3,304.57	31,099.04
Total Hatch, James & Dodge									
Kolesar & Leatham CHTD.	2,004.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,004.95
Legal Fees	5,522.14	156.16	0.00	141.56	183.02	138.21	44.85	507.64	6,185.94
Legal Costs	7,527.09	156.16	0.00	141.56	183.02	138.21	44.85	507.64	8,190.89
Total Kolesar & Leatham CHTD.									
McKenna Long & Aldridge	2,762,030.75	279,571.50	43,155.90	59,914.35	61,135.20	28,615.95	44,422.20	237,243.60	3,278,865.85
Legal Fees	231,189.55	15,434.90	7,274.57	(41.32)	5,963.64	2,011.55	738.02	15,946.46	262,570.91
Legal Costs	2,993,240.30	295,006.40	50,430.47	59,873.03	67,098.84	30,627.50	45,160.22	253,190.06	3,541,436.76
Total McKenna Long & Aldridge									
Total Legal Fees & Costs	3,018,667.19	307,077.23	50,567.66	60,214.59	68,494.44	32,520.51	45,205.07	257,002.27	3,582,726.69
Total Receiver Fees & Expenses	5,307,257.65	472,017.50	82,006.09	76,944.06	84,958.35	47,608.79	58,509.49	350,026.78	6,129,301.93
Total Expense	7,099,447.86	621,777.10	953,112.72	115,621.52	111,327.91	73,159.87	87,074.74	1,340,286.76	9,001,521.72
Net Transactions	6,580,720.56	(917,162.33)	(343,497.31)	196,326.19	(512,575.59)				10,210,138.97
Fund Balance	4,141,993.99								