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Attorneys for Receiver for Defendants
AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS,
LLC; AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS
CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
MANAGEMENT, LLC

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;
AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE,
LLC; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC;
ROBERT J. JESENİK; BRIAN A. OLIVER;
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

DECLARATION OF RONALD F.
GREENSPAN IN SUPPORT OF RECEIVER'S
REQUEST FOR APPROVAL OF
EIGHTEENTH INTERIM FEE
APPLICATION



I, Ronald F. Greenspan, the duly appointed Receiver for the Receivership Entity, declare as follows:

1. I am over 18 year of age and otherwise competent to testify.
2. I make this declaration in support of the Receiver's Request for Approval of Eighteenth Interim Fee Application.
3. The September 30, 2020 Report of the Receiver [Dkt. 860] is incorporated herein by reference in Exhibit A. Exhibit A sets forth several ways in which the report can be obtained.
4. Attached as Exhibit B is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by the Receiver, for the period of July 1, 2020 through September 30, 2020. The Receiver is employed as a Senior Managing Director of FTI, which bills and collects for the Receiver's time as well as that of FTI professionals utilized by the Receiver. Also included in Exhibit B is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by FTI Consulting, Inc. ("FTI"), for the period of July 1, 2020 through September 30, 2020.
5. Attached hereto as Exhibit C is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by Snell & Wilmer ("Snell"), for the period of July 1, 2020 through September 30, 2020, together with the accompanying Certification.
6. Attached hereto as Exhibit D is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Entity, by Schwabe Williamson & Wyatt ("Schwabe"), for the period of July 1, 2020 through September 30, 2020, together with the accompanying Certification.
7. Attached hereto as Exhibit E is a true and accurate copy of the summary invoice

for professional services rendered on behalf of the Receivership Entity, by Parsons Farnell & Grein, LLP (“Parsons Farnell”), for the period of July 1, 2020 through September 30, 2020, together with the accompanying Certification.

8. I have read the entirety of the Eighteenth Interim Fee Application.

9. To the best of my knowledge, information and belief formed after reasonable inquiry, the Eighteenth Interim Fee Application and all fees and expenses therein are true and accurate and comply with the Billing Instructions For Receivers In Civil Actions Commenced By The U.S. Securities And Exchange Commission (the “Billing Instructions”).

10. To the best of my knowledge, information and belief formed after reasonable inquiry, all fees contained in the Eighteenth Interim Fee Application are consistent with the rates previously approved by the Court and the Commission Staff, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

11. It is my opinion that the time spent, services performed, hourly rates charged, and expenses incurred by the Receiver and each of the professional service firms were incurred in the best interests of the Receivership Entity and were indeed essential for the Receiver to discharge the Court-ordered duties and responsibilities. With respect to each litigation matter, I certify that each action is likely to produce a net economic benefit to the estate, based on review of: (i) the legal theories upon which the action was based, including issues of standing; (ii) the likelihood of collection on any judgment which might be obtained; and, (iii) alternative methods of seeking relief, such as the retention of counsel on a contingency basis.

12. To the best of my knowledge, information and belief formed after reasonable inquiry, neither the Receiver nor any of the professional firms has included any amount for which reimbursement is sought for the amortization of the cost of any investment, equipment, or

capital outlay (except to the extent that any such amortization is included within the allowable amounts set forth in the Billing Instructions).

13. To the best of my knowledge, information and belief formed after reasonable inquiry, in seeking reimbursement for a service justifiably purchased or contracted for from a third party, the Receiver requests reimbursement only for the amount billed to the Receivership by the third-party vendor and paid to such vendor.

14. To the best of my knowledge, information and belief formed after reasonable inquiry, with the exception of the Billing Instructions, the Receiver has not entered into any agreement, written or oral, expressed or implied, with any person or entity concerning the amount of compensation to be paid from the Receivership Entity, or any sharing thereof, except that the Receiver's fees shall be paid to FTI.

15. Prior to the filing of the Receiver's Motion for Approval of the Eighteenth Interim Fee Application, the detailed invoices of FTI, Snell, Schwabe, and Parsons Farnell were submitted to the Commission Staff for review and approval.

I declare under penalty of perjury under the laws of the state of Oregon that the foregoing statements and those contained in the attached exhibits, are true and correct to the best of my knowledge, information and belief.

Dated this 17th day of December, 2020.

/s/ Ronald Greenspan

Ronald F. Greenspan, Receiver

EXHIBIT A

EXHIBIT

B

RONALD F. GREENSPAN

COURT-APPOINTED RECEIVER FOR

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES**

(the “Receivership Entity”)

Summary of Activities for Ronald F. Greenspan (the Receiver) and FTI Consulting, Inc.

For professional services rendered and expenses incurred in connection with the Aequitas Receivership matter from July 1, 2020 through September 30, 2020 (the “Application Period”), as described below:

Asset Disposition

- Continued to explore potential disposition of remaining assets, including interest in Portland Seed Fund
- Began planning of the Lux settlement implementation

Business Operations

- Maintained oversight over the day-to-day operations of the Receivership Entity, the Qualified Settlement Fund, and remaining Aequitas staff and contractors
- Continued bank account management duties with respect to the control of the remaining 21 bank accounts
- Managed daily operational matters including, but not limited to:
 - Planning Receivership operations
 - Managing daily operational and financial issues related to active portfolios of receivables (collections, servicing, compliance etc.) in which the Receivership Entity has an interest – gross cash collections from the receivables were approximately \$414 thousand during the Application Period
 - Working with Union Bank on maintaining account collateralization in the form of surety bond for Receivership deposits at Union Bank following drastic changes in the economic conditions due to COVID-19 pandemic
 - Reviewing and addressing daily correspondence from employees, service providers, investors, and various other parties

- Conducting weekly status call with Receivership staff and contractors, including addressing and responding to necessary COVID-19 protocols issued by the government and providing updates and guidance to the employees on ongoing Receivership matters
- Provided guidance to accounting team regarding integration of distribution data into GreatPlains accounting system
- Addressed various third-party invoices for operational purposes
- Maintained and updated the Receivership websites

Case Administration

- Performed activities related to organizing and coordinating the work of the Receivership team
- Monitored and reviewed media coverage of the case

Cash Management

- Continued to monitor cash balances, accounts payable, and accounts receivable, including cash activity related to the implementation of the Court-approved first distribution
- Worked closely with Receivership treasury staff and managed daily cash activities, including reviewing invoices, approving transactions, and signing/releasing checks and wires
- Coordinated various ad-hoc cash management related matters

Claims Administration and Objections

- Continued to work closely with Receivership employees to research and analyze existing investor documentation to update the claims database, with a particular focus on former Income Opportunity Capital investors' transactions
- Coordinated issuance of replacement NODs to a subset of investors
- Responded to various inquiries and ad-hoc requests from investors and their counsel
- Continued to implement the claims process as mandated in the Claims Procedures Order and monitored additional related activities
- Analyzed filed claims, gathered information and conducted research related to various claim matters in preparation for the second interim distribution. Discussed specific claims treatment with counsel and within the team
- Worked closely with counsel on various claims review and potential objections matters
- The FTI Data & Analytics group performed the following tasks:

- Identified, compiled, and reviewed addresses for parties to be included in the second distribution; reconciled undeliverable address information; worked on preparation of information to implement second distribution
- Reviewed investor litigation group membership and updated database records based on information provided by legal counsel
- Integrated necessary data update and prepared replacement NODs for a subset of investors
- Provided analytical support and prepared custom demand letters in connection with the “net winner” claw back efforts
- Maintained and updated “net winner” demand letter status
- Reviewed and revised data to uphold its integrity and continued to implement various quality control measures
- Discussed solutions and improved claim data integration process, provided analytical support for the proposed second distribution
- Performed updates to investor data to analyze availability and reliability of tax ID information and to continue to update distribution plan calculations based on tax ID groupings
- Researched and discussed tax ID verification procedures and process
- Participated in calls and meetings with the rest of the Receivership team to discuss distribution preparation and progress
- Prepared, reviewed, and performed investment transfers when identified
- Maintained database of investor information and filed claims; updated back-end data tables for flexibility of functionalities in the database; worked with IBAT to supplement IBAT investor information in the database; performed various analyses of investor data for the benefit of Receivership operations, claims process, and distribution plan execution
- Performed ad hoc analyses and produced various data reports per requests from third parties

Distribution Plan

- On May 15, 2020, the Receiver filed the Motion to Approve Classification, Allowance of the Amount of Claims for Certain Claimants (Administrative Claims, Convenience Class Claims, and Former-Employment Claims), and Approving Distributions to Those Claimants [Dkt 835], which was approved by the Court on June 1, 2020 [Dkt 838]. Subsequent tasks performed related to this motion include, but not limited to:
 - Drafting cover letter and designing distribution checks for the distributions on Allowed Administrative Claims and Allowed Convenience Class Claims

- Executing the second phase of the first-round distributions totaling approximately \$136,500 (consisting of 731 checks) mailed to claimants on account of their Court-approved Allowed Administrative Claims and Allowed Convenience Class Claims
- Prepared for the second distribution of approximately \$74.1 million that covers 2,056 claims across seven different claim classes, including the majority of Defrauded Investors. Tasks included but are not limited to:
 - Working with counsel on drafting and editing the second distribution motion
 - Performing necessary updates to distribution plan calculations, determining allowed claims and proposed distribution amounts, developing detailed exhibits and planning various logistical matters
 - Calculating impacts of the investor tort settlement agreements on the investor distributions
 - Verifying information related to distribution recipients and reconciling any discrepancies in recipient data
 - Maintaining and updating the distribution FAQs and other related content of the Receivership websites
- Responded to inquiries from investors and investor counsel regarding various distribution related matters

Employee Retention / Matters

- Addressed employee management and retention plan matters:
 - Considered future employee retention plans aimed at achieving efficient staffing levels going forward while facilitating retention of key staff
 - Prepared retention analyses; reviewed, approved, and communicated employee retention plans and agreements
 - Communicated to certain employees on work transition and future involvement
 - Continued to apprise staff regarding progress of the Receivership and next steps and to answer questions

Insurance Matters

- Communicated with counsel on post-mediation settlement and release related matters
- Reviewed, discussed, and approved modified insurance settlement agreement

Investor Communications

- Communicated with various investor groups and individual investors and their legal counsel on an ad hoc basis as necessary
- Performed requested data analyses and responded to numerous investor and counsel inquiries, including those related to investors' settlements with third parties and matters related to the distribution plan

Litigation Consulting

- Discussed case strategies and evaluated necessary or desirable actions with counsel
- Gathered information, developed analyses, and worked with counsel to develop pleadings and various communications related to ongoing and potential Receivership litigation matters
- Planned, researched, and prepared demand letters related to "net winner" claw backs; provided analytical and logistical support to counsel
- Assisted counsel in finalizing revised settlements with certain third parties

Negotiations with Key Counterparties

- Worked with counsel on finalizing settlement agreements with various investor groups, insurance carriers and other parties
- Reviewed and approved final agreements

Status Reports

- Collected data and prepared analyses required for the Receiver's quarterly status report and as necessary to comply with the reporting requirements outlined in the Final Receivership Order
- Drafted the Receiver's report for 2Q-2020 and filed with the Court on August 5, 2020. The 196-page report provided a detailed overview of the Receivership Entity status and operations, including an exhibit containing an entity-level and consolidated report of cash receipts and disbursements
- Prepared for and provided a separate case update to the SEC staff

Tax Issues

- Discussed, reviewed and signed state tax returns
- Researched, reviewed, and discussed assumptions and information necessary for Receivership Entity tax matters, including tax reporting requirement and distribution related tax reporting matters
- Participated in discussions with Receivership tax staff and tax counsel, including tax strategy, and provided input and oversight as needed

Wind-Down of Operation

- Discussed and reviewed office wind-down planning, including short-term office rental options, IT transition, and other related wind-down matters

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR (Receiver)

Summary of Professional Fees and Expenses for Ronald F. Greenspan
For the Period July 1, 2020 Through September 30, 2020

Professional Fees	\$33,247.00
Expenses	<u>\$0.00</u>
Total	<u><u>\$33,247.00</u></u>

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC, AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the "Receivership Entity")

Case No. 3:16-cv-00438-JR - (Receiver)

Summary of Professional Fees for Ronald F. Greenspan
For the Period July 1, 2020 Through September 30, 2020

Professional	Title	Rate	Hours	Total
Greenspan, Ronald F	Sr Managing Dir	\$825	40.3	\$33,247.00
Total Hours and Fees			40.3	\$33,247.00
<u>For Informational Purposes Only:</u>				
Total Billing Rate Discount				\$18,941.00
Additional Written Off Professional Fees			3.6	\$4,662.00
Total Discounts and Reductions			3.6	\$23,603.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of Professional Fees By Activity for Ronald F. Greenspan
For the Period July 1, 2020 Through September 30, 2020**

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Asset Disposition</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	0.3	\$247.50
	Activity Total		0.3	\$247.50
<u>Case Administration</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	0.6	\$495.00
	Activity Total		0.6	\$495.00
<u>Claims Administration and Objections</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	1.1	\$907.50
	Activity Total		1.1	\$907.50
<u>Distribution Plan</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	16.5	\$13,612.50
	Activity Total		16.5	\$13,612.50
<u>Employee Retention/Matters</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	0.2	\$165.00
	Activity Total		0.2	\$165.00
<u>Insurance Matters</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	1.5	\$1,237.50
	Activity Total		1.5	\$1,237.50
<u>Investor Communications</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	1.3	\$1,072.50
	Activity Total		1.3	\$1,072.50
<u>Litigation Consulting</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	9.9	\$8,167.50
	Activity Total		9.9	\$8,167.50
<u>Negotiations with Key Counterparties</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	2.5	\$2,062.50
	Activity Total		2.5	\$2,062.50

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Status Reports (SEC and court)</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	6.0	\$4,950.00
	Activity Total		6.0	\$4,950.00
<u>Tax Issues</u>				
Greenspan, Ronald F	Sr Managing Dir	\$825	0.4	\$330.00
	Activity Total		0.4	\$330.00
TOTALS			40.3	\$33,247.50

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of Expenses By Expense Type for Ronald F. Greenspan
For the Period July 1, 2020 Through September 30, 2020**

Expense Type	Total
	\$0.00
Total Expenses	\$0.00

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR

Summary of FTI Consulting, Inc. Fees and Expenses
For the Period July 1, 2020 Through September 30, 2020

Professional Fees	\$505,900.00
Expenses	<u>\$0.00</u>
Total	<u><u>\$505,900.00</u></u>

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Professional Fees By Professional
For the Period July 1, 2020 Through September 30, 2020**

Professional	Title	Rate	Hours	Total
Foster, Charles	Managing Dir	\$660	12.1	\$7,986.00
Gotguelf, Larissa	Managing Dir	\$660	344.9	\$227,634.00
Allen, Jennifer	Senior Director	\$605	45.6	\$27,588.00
Chuck, Brenton	Senior Director	\$605	189.2	\$114,466.00
An, Yang	Sr Consultant	\$420	305.3	\$128,226.00
Total Hours and Fees			897.1	\$505,900.00
<u>For Informational Purposes Only:</u>				
Total Billing Rate Discount				\$85,381.00
Additional Written Off Professional Fees			46.10	\$34,185.50
Total Discounts and Reductions			46.10	\$119,565.50

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Fees By Activity and Professional
For the Period July 1, 2020 Through September 30, 2020**

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Asset Disposition</u>				
Gotguelf, Larissa	Managing Dir	\$660	4.4	\$2,904.00
	Activity Total		4.4	\$2,904.00
<u>Business Operations</u>				
Foster, Charles	Managing Dir	\$660	3.5	\$2,310.00
Gotguelf, Larissa	Managing Dir	\$660	15.3	\$10,098.00
	Activity Total		18.8	\$12,408.00
<u>Case Administration</u>				
Foster, Charles	Managing Dir	\$660	0.3	\$198.00
Gotguelf, Larissa	Managing Dir	\$660	1.0	\$660.00
	Activity Total		1.3	\$858.00
<u>Cash Management</u>				
Foster, Charles	Managing Dir	\$660	0.5	\$330.00
Gotguelf, Larissa	Managing Dir	\$660	7.5	\$4,950.00
	Activity Total		8.0	\$5,280.00
<u>Claims Administration and Objections</u>				
Foster, Charles	Managing Dir	\$660	0.8	\$528.00
Gotguelf, Larissa	Managing Dir	\$660	43.4	\$28,644.00
	Activity Total		44.2	\$29,172.00
<u>Data & Analytics Claims Administration and Objections</u>				
Allen, Jennifer	Senior Director	\$605	45.6	\$27,588.00
An, Yang	Sr Consultant	\$420	305.3	\$128,226.00
Chuck, Brenton	Senior Director	\$605	189.2	\$114,466.00
	Activity Total		540.1	\$270,280.00
<u>Distribution Plan</u>				
Foster, Charles	Managing Dir	\$660	0.4	\$264.00
Gotguelf, Larissa	Managing Dir	\$660	162.6	\$107,316.00
	Activity Total		163.0	\$107,580.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Fees By Activity and Professional
For the Period July 1, 2020 Through September 30, 2020**

<u>Activity/Professional</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>Employee Retention/Matters</u>				
Gotguelf, Larissa	Managing Dir	\$660	4.2	\$2,772.00
	Activity Total		4.2	\$2,772.00
<u>Investor Communications</u>				
Gotguelf, Larissa	Managing Dir	\$660	10.7	\$7,062.00
	Activity Total		10.7	\$7,062.00
<u>Litigation Consulting</u>				
Foster, Charles	Managing Dir	\$660	1.5	\$990.00
Gotguelf, Larissa	Managing Dir	\$660	50.2	\$33,132.00
	Activity Total		51.7	\$34,122.00
<u>Negotiations with Key Counterparties</u>				
Gotguelf, Larissa	Managing Dir	\$660	2.9	\$1,914.00
	Activity Total		2.9	\$1,914.00
<u>Status Reports (SEC and court)</u>				
Gotguelf, Larissa	Managing Dir	\$660	31.7	\$20,922.00
	Activity Total		31.7	\$20,922.00
<u>Tax Issues</u>				
Foster, Charles	Managing Dir	\$660	5.1	\$3,366.00
Gotguelf, Larissa	Managing Dir	\$660	2.9	\$1,914.00
	Activity Total		8.0	\$5,280.00
<u>Wind-Down of Operations</u>				
Gotguelf, Larissa	Managing Dir	\$660	8.1	\$5,346.00
	Activity Total		8.1	\$5,346.00
TOTALS			897.1	\$505,900.00

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS COMMERCIAL FINANCE, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN
RELATED ENTITIES (the "Receivership Entity")
Case No. 3:16-cv-00438-JR**

**Summary of FTI Consulting, Inc. Expenses By Expense Type
For the Period July 1, 2020 Through September 30, 2020**

Expense Type	Total
	\$0.00
Total Expenses	\$0.00

EXHIBIT

C

Ivan B. Knauer (Admitted *Pro Hac Vice*)
 SNELL & WILMER L.L.P.
 1101 Pennsylvania Avenue N.W., Ste. 312
 Washington DC, 20004
 Telephone: (202) 802-9770
 Email: iknauer@swlaw.com

Attorneys for Receiver and for Defendants
 AEQUITAS MANAGEMENT, LLC;
 AEQUITAS HOLDINGS, LLC;
 AEQUITAS COMMERCIAL FINANCE, LLC;
 AEQUITAS CAPITAL MANAGEMENT, INC.;
 AEQUITAS INVESTMENT MANAGEMENT, LLC

**IN THE UNITED STATE DISTRICT COURT
 FOR THE DISTRICT OF OREGON, PORTLAND DIVISION**

**SECURITIES AND EXCHANGE
 COMMISSION**

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC, et al

Defendants.

**CERTIFICATION OF IVAN B. KNAUER
 IN SUPPORT OF RECEIVER'S
 MOTION FOR APPROVAL OF FEE
 APPLICATION**

No. 3:16-cv-00438-JR

I, Ivan B. Knauer, certify as follows:

1. Attached is a true and accurate copy of the summary invoice for professional services rendered on behalf of the Receivership Estate, by Snell & Wilmer L.L.P., for the period of July 1, 2020 through September 30, 2020.

2. I have reviewed the summary invoice as well as the underlying time entries and other supporting data.

3. To the best of my knowledge, information and belief formed after reasonable inquiry, the summary invoice and all fees and expenses therein are true and accurate and comply with the Billing Instructions For Receivers In Civil Actions Commenced By The U.S. Securities And Exchange Commission (the "Billing Instructions").

4. To the best of my knowledge, information and belief formed after reasonable inquiry, all fees contained in the summary invoice are consistent with the rates previously approved by the Court and the Commission Staff, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

5. To the best of my knowledge, information and belief formed after reasonable inquiry, Snell & Wilmer L.L.P. has not included any amount for which reimbursement is sought for the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the allowable amounts set forth in the Billing Instructions).

6. To the best of my knowledge, information and belief formed after reasonable inquiry, in seeking reimbursement for a service justifiably purchased or contracted for from a third party, Snell & Wilmer L.L.P. requests reimbursement only for the amount billed to Snell & Wilmer L.L.P. by the third-party vendor and paid to such vendor.

DATED this 16th day of October, 2020.

/s/ Ivan B. Knauer

Ivan B. Knauer

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT
MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the “Receivership Entity”)

Case No. 3:16-cv-00438-JR

SUMMARY OF WORK PERFORMED BY SNELL & WILMER L.L.P.

July 1, 2020 through September 30, 2020

This Summary describes professional services rendered and expenses incurred in connection with the Aequitas Receivership matter from July 1, 2020 through September 30, 2020, as described in more detail below. Also provided below is a breakdown by billing codes, in conformity with the SEC billing guidelines.

- Performed ongoing legal work in support of the Receiver’s efforts to respond to ongoing regulatory investigations, requirements, and other litigation-related requests.

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT
MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the “Receivership Entity”)

Case No. 3:16-cv-00438-JR

**SUMMARY OF PROFESSIONAL FEES AND EXPENSES
PERFORMED BY SNELL & WILMER L.L.P.**

July 1, 2020 through September 30, 2020

Professional Fees	\$877.50
Expenses	\$0.00
TOTAL	\$877.50

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT
MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the “Receivership Entity”)

Case No. 3:16-cv-00438-JR

SUMMARY OF PROFESSIONAL FEES PERFORMED BY SNELL & WILMER L.L.P.

July 1, 2020 through September 30, 2020

Name	Title	Hours	Rate	Fees
I.B. Knauer	Partner	1.30	\$675.00	\$877.50

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT
MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the "Receivership Entity")

Case No. 3:16-cv-00438-JR

SUMMARY OF SNELL & WILMER L.L.P. FEES BY TASK AND PROFESSIONAL
July 1, 2020 through September 30, 2020

B110 Case Administration

Name	Title	Hours	Rate	Fees
I.B. Knauer	Partner	1.30	\$675.00	\$877.50
TOTAL				\$877.50

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC,
 AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT
 MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
 (the "Receivership Entity")

Case No. 3:16-cv-00438-JR

SUMMARY OF SNELL & WILMER L.L.P. FEES BY ACTIVITY CODE

July 1, 2020 through September 30, 2020

01 SEC Enforcement Action

Name	Title	Hours	Rate	Fees
I.B. Knauer	Partner	1.30	\$675.00	\$877.50

18 Federal (non-SEC)

Name	Title	Hours	Rate	Fees
I.B. Knauer	Partner	0	\$675.00	\$0.00

AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC,
AEQUITAS CAPITAL MANAGEMENT, INC., AEQUITAS INVESTMENT
MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES
(the “Receivership Entity”)

Case No. 3:16-cv-00438-JR

SUMMARY OF SNELL & WILMER L.L.P. EXPENSES

July 1, 2020 through September 30, 2020

Expense Type	Total
Hotels	\$0.00
Airfare	\$0.00
Meals	\$0.00
Transportation	\$0.00
Parking	\$0.00
TOTAL	\$0.00

Troy Greenfield, OSB #892534
Email: tgreenfield@schwabe.com
Alex I. Poust, OSB #925155
Email: apoust@schwabe.com
Lawrence R. Ream (Admitted Pro Hac Vice)
Email: lream@schwabe.com
SCHWABE, WILLIAMSON & WYATT, P.C.
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
Telephone: 503-222-9981
Facsimile: 503-796-2900

Attorneys for Receiver for Defendants AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC; AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT MANAGEMENT, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;
AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE,
LLC; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC;
ROBERT J. JESENIK; BRIAN A. OLIVER;
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

CERTIFICATION OF LAWRENCE R. REAM
IN SUPPORT OF RECEIVER'S MOTION
FOR APPROVAL OF EIGHTEENTH
INTERIM FEE APPLICATION

I, Lawrence R. Ream, certify as follows:

1. Attached as Exhibit 1 is a true and accurate copy of the summary invoice for

PAGE 1 - CERTIFICATION OF LAWRENCE R. REAM IN SUPPORT OF
RECEIVER'S MOTION FOR APPROVAL OF EIGHTEENTH
INTERIM FEE APPLICATION
(JULY 1, 2020 THROUGH SEPTEMBER 30, 2020)

professional services rendered and expenses incurred on behalf of the Receivership Estate, by Schwabe Williamson & Wyatt, for the period of July 1, 2020 through September 30, 2020.

2. I have reviewed the summary invoice as well as the underlying time entries and other supporting data.

3. To the best of my knowledge, information and belief formed after reasonable inquiry, the summary invoice and all fees and expenses therein are true and accurate and comply with the Billing Instructions For Receivers In Civil Actions Commenced By The U.S. Securities And Exchange Commission (the “Billing Instructions”).

4. To the best of my knowledge, information and belief formed after reasonable inquiry, all fees contained in the summary invoice are consistent with the rates previously approved by the Court and the Commission Staff, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

5. To the best of my knowledge, information and belief formed after reasonable inquiry, Schwabe Williamson & Wyatt has not included any amount for which reimbursement is sought for the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the allowable amounts set forth in the Billing Instructions).

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6. To the best of my knowledge, information and belief formed after reasonable inquiry, in seeking reimbursement for a service justifiably purchased or contracted for from a third party, Schwabe Williamson & Wyatt requests reimbursement only for the amount billed to Schwabe Williamson & Wyatt by the third-party vendor and paid to such vendor.

Dated this 17th day of December, 2020.

/s/ Lawrence R. Ream

Lawrence R. Ream, on behalf of Schwabe
Williamson & Wyatt

EXHIBIT 1

(Eighteenth Interim Fee Application -
July 1, 2020 through September 30, 2020)

EXHIBIT

D

Schwabe Williamson & Wyatt

Summary of professional services rendered and expenses incurred in connection with the Aequitas Receivership matter for this Eighteenth Application Period from July 1, 2020 through September 30, 2020, as summarized below:

Asset Analysis Recovery and Disposition

During this Eighteenth Application Period, Schwabe had extensive communications with the Receiver, the Receiver's professionals and the remaining Aequitas employees regarding various issues related to the Receivership Estate's claims against net winners and others. Work included an analysis of various net winner assertions, including inability to pay, corporate dissolution and other purported defenses. Schwabe was involved in extensive communications directly with net winners, as well as with counsel and other professionals acting on behalf of net winners. Schwabe assisted in processing net winner recoveries, which involved communications directly with net winners, as well as with counsel and other professionals acting on behalf of net winners. Schwabe prepared form demand letters and related documents, settlement agreements, and took other actions to process net winner recoveries. Schwabe reviewed data and communicated with the Receiver and other members of the Receiver's team regarding progress and strategy. Schwabe prepared settlement agreements and assisted in securing payments to the Receivership. Schwabe assisted the Receiver in analyzing legal arguments raised by counsel and advised the Receiver regarding the efficacy of those arguments.

Case Administration

As general counsel to the Receiver, Schwabe consults with the Receiver regarding the day-to-day issues that arise in the administration of this Receivership case. Work performed includes:

- Communicate with other federal authorities regarding possible fraud against Aequitas investors.
- Coordinate requests for conflict waivers regarding non-Aequitas and non-defendant targets of the Receivership.
- Coordinating internal task management.
- Responding to inquiries from creditors, investors, investor groups, and legal counsel related to Receivership issues, questions, or disputes, including requests regarding the pending and upcoming Court-approved distributions.
- Assist the Receiver with the various tax related issues for the Qualified Settlement Fund ("QSF"), entity tax return and other tax related issues.
- Preparing for and participating in conference calls with the Receiver and his various professionals regarding the division of tasks for efficiency and avoidance of duplication.
- Assist and advise the Receiver regarding a third-party, non-Receivership data breach issue, procedural issues, distribution related issues, consolidated database access and related issues, litigation and projected recoveries, and other administrative matters, disputes and demands.

- Preparing for and participating in discussions and conference calls with the Receiver and the SEC Staff on numerous Receivership issues, including for example, implementation and other issues related to the Court-approved distribution plan, class action related issues and insurance coverage issues.
- Assisting in the preparation of the Receiver's mandatory interim reports.
- Reviewing and responding to inquiries from the Press.
- Researching and drafting memorandum regarding issues that arise in the ordinary course of the Receivership.

Claims Administration

Schwabe continues to assist the Receiver with issues related to the administration of claims and the claims process, including the following efforts:

- Schwabe communicated with multiple counsel for investors regarding the motion to approve the second distribution and specifics of the anticipated distribution.
- Schwabe assisted the Receiver in resolving the scheduling of certain claims and addressing data issues necessary to facilitate the second round of distributions.
- Schwabe worked on obtaining a stipulation from certain plaintiff investor groups and in addressing issues related to their request for revised notices of determination ("NOD") regarding claim aggregation.
- Schwabe addressed issues relating to the tort claim settlement in the context of the second contemplated distribution process, including anticipated timing and the logistics of the second round of distributions.
- Researched, analyzed and advised the Receiver regarding various state and federal law issues raised by counsel for net winners and other defendant targets.
- Schwabe communicated with counsel regarding a clerical error regarding the claims of an affiliated entity and the manner in which the error would be corrected by the Court.
- Schwabe drafted the pleadings necessary to correct the clerical error regarding the affiliated entities and resolve an instance where accounts were not aggregated.
- Schwabe communicated with the Receiver regarding issues related to possible whistleblower claims.
- Schwabe reviewed and responded to emails and participated in telephone calls with the Receiver and the Receivership professionals regarding claims questions, including issues related to competing claims for the same proceeds and other claims issues.
- Schwabe responded to numerous telephone calls and emails from claimants with questions related to their specific claim classification, treatment, and the calculation of their distribution under the second distribution motion approved by the Court.
- Schwabe analyzed draft provisions and comments addressing issues related to the tort claims settlement.
- Schwabe analyzed and advised the Receiver regarding various tax issues related to the contemplated distribution process, including reporting requirements, withholding obligations, bundling payments, and other legal research regarding the QSF.

- Schwabe assisted the Receiver and the Receivership professionals in analyzing various claims, including disputed claims, updated NOD issues, omnibus claim classification, allowance, and other claimant related issues.
- Schwabe communicated with various interested investors, counsel, registered investment advisors, and other parties regarding issues and questions related to the settlement of claims litigation.

Distribution Plan

Schwabe assisted the Receiver with issues related to the implementation of the Court-approved distribution plan, including the following efforts:

- Review emails from the Receiver and Receiver's professionals regarding claim reserve issues, including review of the claims reserve spreadsheet in advance of the filing of the second distribution motion.
- Review emails from the Receiver's professionals and internally regarding net winner and setoff issues from related distributions, review settlement agreements and resolve revisions to the settlement agreements and the distribution motion.
- Consulted with the Receiver and the Receiver's professionals regarding revisions to the exhibits and footnotes to the exhibits and prepare additional revisions to the motion and exhibits as issues arose or were determined.
-
- Researched and drafted memorandum regarding classification, tax, withholding, reporting, claim transfer, record date, setoff and other claim preservation issues, net winner and affiliated account issues, QSF issues, and other plan administration issues.
- Prepared for and participated in numerous conference calls with the Receiver, his various professionals and other interested parties regarding classification, claim determination, priority, payment, and other issues related to the second distribution motion.
- Consulted with the Receiver's professionals regarding certain settlements and related tax issues, including potential withholding on amounts going to foreign owners, questions regarding 2019 federal income tax return and cancellation of debt issues, potential state income tax issues stemming from allocation of cancellation of debt income, and issues related to the allocation of the class portion of the tort settlement.
- Consulted with the Receiver and the Receiver's professionals regarding allocating tort-sourced vs. contract-sourced distributions to class members, and the potential implications.
- Finalized and filed the notice, motion, declaration, proposed order, and other related documents to obtain Court approval of the Receiver's second classification, claim allowance and distribution motion related to administrative, convenience class, former employee, defrauded investor, creditor, individual defendant, and pass-through investor class claims.
- Schwabe assisted the Receiver in the drafting of the cover letters to be sent with the distribution checks and developing updated communications posted to the Receivership websites, including FAQ's regarding the second classification, allowance and distribution motion.

Litigation

Schwabe provides litigation-related services and advice to the Receiver for matters including general litigation issues, insurance issues, database issues, and issues related to the assertion and resolution of claims/disputes with investors, creditors and other interested parties, as partially detailed below. Work has included the following:

General Issues

- Review, evaluate and advise the Receiver regarding certain investor, litigation, and settlement issues related to implementation of the distribution plan.
- Review, evaluate and advise the Receiver regarding other litigation issues, including relief from the stay under seal to obtain Court approval to initiate new claims on behalf of the Receivership Estate.
- Extensive separate communications with counsel for the various plaintiff and other groups regarding settlement terms, the omnibus settlement approval process, and other plan related issues.
- Review file materials and work on settlement term sheets and related documents and draft the various pleadings, declaration and other supporting documentation in support of the omnibus motion to approve various settlements.
- Continue efforts to formalize the documentation of the various investor settlements, including process issues and extensive communications with investors' counsel in support of the omnibus settlements.
- Prepare notice, motion, memorandum, supporting declaration, order and other materials in support of various settlements. Prepared findings, recommendations and order in support of the various settlements and proposed limited judgment.
- Prepare motion to intervene and motion for protective order related to the pending criminal matter.
- Review and respond to various emails from Judge Simon in connection with procedural matters.
- Prepare comprehensive review of resolved, pending and potential litigation spreadsheet as requested by the Receiver.
- Continued assessment of additional claims against the remaining net winners and other recovery targets.
- Separate communications with the Receiver's insurance coverage counsel regarding various settlement related issues.
-
- Conduct research regarding various issues needed in defense of the Receiver's recovery and related litigation.

Insurance Issues

- Review file materials and information provided by the Receiver's data team, and prepare a summary of issues for the Receiver's consideration.

- Continued pursuit of amended and restated settlement agreements with defendant professional firms and plaintiff investor groups, including extensive communication with counsel, review of file materials and communication with the Receiver.
- Analyzed several drafts of settlement agreements amongst the Receivership, the insurers and the individual insureds.
- Addressed issues relating to the proposed scope of release amongst parties and communicate with the Receiver's insurance coverage counsel regarding strategy and other issues.
- Review insurance coverage pleadings and other file materials, and work on the primary settlement agreement to be executed by the insurance carriers, the individual insureds and the Receiver.
- Worked on issues for presentation to the mediator for resolution pursuant the terms of the mediator's proposal and communicated with coverage counsel and the Receiver in light of the preliminary indications from the mediator relating to the outstanding settlement issues.
- Prepared the motion, memorandum, declaration of the Receiver and other pleadings in support of the omnibus motion to approve settlement agreements.
- Extensive separate communications with counsel for the advisory board, counsel for insureds, and the SEC staff counsel regarding insurance coverage litigation matters.

Database & Investigation Issues

- Addressed issues relating to access to the consolidated database by the government and criminal defendants, involving extensive, separate communication with representatives of the U.S. Attorney's Office, receivership team members, representatives of FTI Tech and criminal defense counsel.
- Reviewed and revised drafts of the motion for protective order and the corresponding order, research and analysis of authorities governing the associated issues.
- Conducted Court searches and other materials related to the pending criminal matters.

Newman

- Received and reviewed the Court order granting reconsideration, affirming judgment and awarding fees.
- Communicated with the Receiver, the Receiver's professionals and co-counsel regarding the Court's rulings.
- Communicated with the Receiver, the Receiver's professionals and co-counsel regarding procedural issues, judgment debtor examinations and other post-judgment remedies.
- Drafted, revised and prepared the judgment consistent with the Court's determination.
- Consulted with the Receiver and the Aequitas team regarding potential settlement and related issues.

Former Officer and Other Litigation

- Reviewed file materials and revised the pleadings and other documents needed to initiate newly authorized litigation.
- Reviewed file materials and directed necessary research, in preparation for initiating both a federal court action and a necessary arbitration.
- Reviewed prior and conducted new uniform commercial code searches and reviewed the applicable commercial security agreement in preparation for the filing of a complaint and lodging an arbitration demand.
- Communicated with counsel for one of the defendant parties regarding an amended and restated settlement agreement negotiated with the professional firms and the plaintiff investor groups.
- In another matter, Schwabe analyzed the latest offer and supporting arguments proffered by a defendant target and communicated with the Receiver and the Receiver's professionals regarding the offer and purported defenses.
- Reviewed and communicate with the Receiver's professionals regarding the accumulated data and materials refuting the defendant's contentions.
- Communicated with counsel for the defendant party regarding the accumulated data and other materials refuting the defendant's claims.
- Analyzed additional claims against the defendant party.
- Communicated with the defendant's counsel regarding potential settlement and terms of resolution.

Schwabe

WILLIAMSON & WYATT®

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Mountain View, CA

TAX ID# IRS-93-1130272

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
Entity")**

Case No. 3:16-cv-00438-JR

**Summary of Professional Fees and Expenses for Schwabe, Williamson & Wyatt P.C.
For the Period July 1, 2020 through September 30, 2020**

Professional Fees	\$355,445.50
Expenses	<u>\$ 312.12</u>
Total	\$355,757.62

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

IOLTA PARTICIPANTS • PROCEEDS SUPPORT PUBLIC INTEREST OBJECTIVES OF THE LAW FOUNDATIONS.

ATTORNEY-CLIENT COMMUNICATION, PRIVILEGED AND CONFIDENTIAL.

Schwabe

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TAX ID# IRS-93-1130272

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
 Entity")**

Case No. 3:16-cv-00438-JR

**Summary of Professional Fees by Professional for Schwabe, Williamson & Wyatt P.C.
 For the Period July 1, 2020 through September 30, 2020**

Professional	Title	Hours	Rate	Amount
Lee, Andrew J	N/EQ Sh/holder	26.80	465.00	12,462.00
Soleimanpour, Alee	Associate	25.50	330.00	8,415.00
Poust, Alex	Shareholder	16.00	510.00	8,160.00
Bowman, Blake K	Associate	1.30	330.00	429.00
Eller, Dan	Shareholder	0.10	510.00	51.00
Fullerton, Emily S B	Associate	12.50	330.00	4,125.00
Parker, Joel A	Shareholder	0.20	490.00	98.00
Chapman, Julie M	Legal Assistant	1.00	230.00	230.00
Way, M John	N/EQ Sh/holder	33.40	465.00	15,531.00
Zunkel-DeCoursey, Jon	Associate	7.60	330.00	2,508.00
Ream, Lawrence R	Shareholder	237.80	510.00	121,278.00
Cotton, Sara C	N/EQ Sh/holder	2.90	465.00	1,348.50
Greenfield, Troy D	Shareholder	369.00	490.00	180,810.00
Total Hours/Fees		734.10		355,445.50

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

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TAX ID# IRS-93-1130272

**AEQUITAS MANAGEMENT, LLC, AEQUITAS HOLDINGS, LLC, AEQUITAS CAPITAL MANAGEMENT, INC.,
 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
 Entity")**

Case No. 3:16-cv-00438-JR

**Summary of Professional Fees by Task Code for Schwabe, Williamson & Wyatt P.C.
 For the Period July 1, 2020 through September 30, 2020**

Asset Analysis & Recovery – B101

Professional	Title	Rate	Hours	Amount
Troy D Greenfield	Shareholder	490.00	78.80	38,612.00
Task Total			78.80	38,612.00

Asset Disposition – B102

Professional	Title	Rate	Hours	Amount
Lawrence R Ream	Shareholder	510.00	0.90	459.00
Troy D Greenfield	Shareholder	490.00	0.90	441.00
Task Total			1.80	900.00

Ongoing Business Operations – B103

Blake K Bowman	Associate	330	1.3	429.00
Task Total			1.30	429.00

Case Administration – B105

Professional	Title	Rate	Hours	Amount
Dan Eller	Shareholder	510.00	0.10	51.00
Lawrence R Ream	Shareholder	510.00	21.30	10,863.00
Troy D Greenfield	Shareholder	490.00	71.40	34,986.00
Task Total			92.80	45,900.00

Claims Administration & Objections – B106

Professional	Title	Rate	Hours	Amount
Lawrence R Ream	Shareholder	510.00	37.20	18,972.00
Troy D Greenfield	Shareholder	490.00	75.10	36,799.00
Andrew J Lee	N/EQ Sh/holder	465.00	26.80	12,462.00
Alee Soleimanpour	Associate	330.00	25.50	8,415.00
Task Total			164.60	76,648.00

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

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 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the "Receivership
 Entity")**

Case No. 3:16-cv-00438-JR

**Summary of Professional Fees by Task for Schwabe, Williamson & Wyatt P.C.
 For the Period July 1, 2020 through September 30, 2020**

Receiver Plan & Analysis Issues – B108

Professional	Title	Rate	Hours	Amount
Lawrence R Ream	Shareholder	510.00	144.90	73,899.00
M John Way	N/EQ Sh/holder	465.00	33.40	15,531.00
Jon Zunkel-DeCoursey	Associate	330.00	7.60	2,508.00
Task Total			185.90	91,938.00

Litigation – B109

B109	Litigation			
Professional	Title	Rate	Hours	Amount
Alex Poust	Shareholder	510.00	16.00	8,160.00
Lawrence R Ream	Shareholder	510.00	33.50	17,085.00
Troy D Greenfield	Shareholder	490.00	142.80	69,972.00
Joel A Parker	Shareholder	490.00	0.20	98.00
Sara C Cotton	N/EQ Sh/holder	465.00	2.90	1,348.50
Emily S B Fullerton	Associate	330.00	12.50	4,125.00
Julie M Chapman	Legal Assistant	230.00	1.00	230.00
Task Total			208.90	101,018.50
Grand Total			734.10	355,445.50

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

IOLTA PARTICIPANTS • PROCEEDS SUPPORT PUBLIC INTEREST OBJECTIVES OF THE LAW FOUNDATIONS.

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 AEQUITAS INVESTMENT MANAGEMENT, LLC AND CERTAIN RELATED ENTITIES (the “Receivership
 Entity”)**

Case No. 3:16-cv-00438-JR

**Summary of Expenses for Schwabe, Williamson & Wyatt P.C.
 For the Period July 1, 2020 through September 30, 2020**

Expense Type	Quantity	Rate	Amount
Online Research	1	50.41	50.41
Copies/Print	5	0.15	0.75
Shipping charges	2	9.48	18.96
UCC Filing/Search	3	-	242.00
Total Expenses			312.12

TERMS: DUE AND PAYABLE UPON RECEIPT.

AMOUNTS UNPAID MORE THAN 30 DAYS AFTER INVOICING ARE SUBJECT TO A LATE PAYMENT CHARGE OF 9% PER ANNUM.

IOLTA PARTICIPANTS • PROCEEDS SUPPORT PUBLIC INTEREST OBJECTIVES OF THE LAW FOUNDATIONS.

ATTORNEY-CLIENT COMMUNICATION, PRIVILEGED AND CONFIDENTIAL.

EXHIBIT

E

MICHAEL E. FARNELL (Oregon Bar No. 922966)
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PARSONS FARNELL & GREIN, LLP
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Telephone: 503-222-1812
Facsimile: 503-274-7979

Attorneys for Receiver and for Defendants
AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS
CAPITAL MANAGEMENT, INC; AEQUITAS INVESTMENT
MANAGEMENT, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Case No: 3:16-cv-00438-JR

Plaintiff,

v.

**CERTIFICATION OF
MICHAEL E. FARNELL IN SUPPORT
OF RECEIVER'S MOTION FOR
APPROVAL OF FEE APPLICATION**

AEQUITAS MANAGEMENT, LLC;
AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE,
INC.; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC;
ROBERT J. JESENİK; BRIAN A.
OLIVER; and N. SCOTT GILLIS,

Defendants.

I, Michael E. Farnell, certify as follows:

1. Attached is a true and accurate copy of the summary invoice for professional

Page 1 – CERTIFICATION OF MICHAEL E. FARNELL
IN SUPPORT OF RECEIVER'S MOTION FOR
APPROVAL OF FEE APPLICATION

services rendered on behalf of the Receivership Estate by Parsons Farnell & Grein, LLP, for the period from July 1, 2020 through September 30, 2020.

2. I have reviewed the summary invoice as well as the underlying time entries and other supporting data.

3. To the best of my knowledge, information and belief formed after reasonable inquiry, the summary invoice and all fees and expenses therein are true and accurate and comply with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the “Billing Instructions”).

4. To the best of my knowledge, information and belief formed after reasonable inquiry, all fees contained in the summary invoice are consistent with the rates previously approved by the Court and the Commission Staff, and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed.

5. To the best of my knowledge, information and belief formed after reasonable inquiry, Parsons Farnell & Grein, LLP has not included any amount for which reimbursement is sought for the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the allowable amounts set forth in the Billing Instructions).

6. To the best of my knowledge, information and belief formed after reasonable inquiry, in seeking reimbursement for a service justifiably purchased or contracted for from a

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third party, Parsons Farnell & Grein, LLP requests reimbursement only for the amount billed to Parsons Farnell & Grein, LLP by the third-party vendor and paid to such vendor.

DATED this 21st day of October, 2020.

s/ Michael E. Farnell
Michael E. Farnell, OSB #922996

AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
MANAGEMENT, LLC; AND CERTAIN RELATED ENTITIES
(the “Receivership Entity”)
Case No. 3:16-cv-00438-JR

**SUMMARY OF WORK PERFORMED BY PARSONS FARNELL & GREIN, LLP
July 1, 2020 through September 30, 2020**

This Summary describes professional services rendered and expenses incurred in connection with the Aequitas Receivership matter from July 1, 2020 through September 30, 2020, as described in more detail below. Also provided is a breakdown by billing codes, in conformity with the SEC billing guidelines.

Receivership Coverage Litigation and Proceedings

- Continued assessment of coverage strategies for the Receivership Entity in light of ongoing developments in SEC civil and criminal actions
- Continued post-mediation efforts to reach settlement of all issues between the Receiver, the insurers except Catlin Specialty Insurance Company, and the individual insureds
- Engaged in numerous revisions of settlement agreement between the Receiver, the insurers except Catlin Specialty Insurance Company, and the individual insureds, and analyzed latent issues regarding the same
- Finalized settlement agreement and prepare for its execution. As part of finalizing the settlement, negotiated additional terms regarding scope of releases, allocation of settlement payment, timing of payment, and condition of obtaining court approval. Additionally, briefed and had follow up conversations with mediator regarding the same
- Continued post-mediation discussions with Catlin Specialty Insurance Company and mediator regarding possibility of settlement
- Drafted and obtained consent from other parties on multiple joint status reports and filed same with the court

AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
MANAGEMENT, LLC; AND CERTAIN RELATED ENTITIES
(the “Receivership Entity”)
Case No. 3:16-cv-00438-JR

SUMMARY OF PARSONS FARNELL & GREIN, LLP FEES AND EXPENSES
July 1, 2020 through September 30, 2020

Receivership Coverage Litigation and Proceedings

Professional Fees	\$ 30,291.00
Expenses	<u>\$ 1,553.88</u>
TOTAL	<u>\$ 31,844.88</u>

AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
 AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
 MANAGEMENT, LLC; AND CERTAIN RELATED ENTITIES
 (the “Receivership Entity”)
 Case No. 3:16-cv-00438-JR

**SUMMARY OF PARSONS FARNELL & GREIN, LLP PROFESSIONAL FEES
 BY PROFESSIONAL AND MATTER
 July 1, 2020 through September 30, 2020**

Receivership Coverage Litigation and Proceedings

Name	Title	Hours	Rate	Fees
Jason M. Gauss	Associate	67.00	\$300.00	\$ 20,100.00
Kevin T. Sasse	Associate	17.60	\$240.00	\$ 4,224.00
Michael E. Farnell	Partner	15.60	\$382.50	\$ 5,967.00
TOTAL:		100.20		\$ 30,291.00

AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
 AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
 MANAGEMENT, LLC; AND CERTAIN RELATED ENTITIES
 (the “Receivership Entity”)
 Case No. 3:16-cv-00438-JR

**SUMMARY OF PARSONS FARNELL & GREIN, LLP PROFESSIONAL FEES
 BY TASK AND PROFESSIONAL
 July 1, 2020 through September 30, 2020**

Receivership Coverage Litigation and Proceedings

LA1 Asset Analysis and Recovery

Name	Title	Hours	Rate	Fees
Jason M. Gauss	Associate	67.00	\$300.00	\$ 20,100.00
Kevin T. Sasse	Associate	17.60	\$240.00	\$ 4,224.00
Michael E. Farnell	Partner	15.60	\$382.50	\$ 5,967.00
Total Asset Analysis and Recovery				<u>\$ 30,291.00</u>

AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC;
 AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT
 MANAGEMENT, LLC; AND CERTAIN RELATED ENTITIES
 (the “Receivership Entity”)
 Case No. 3:16-cv-00438-JR

SUMMARY OF PARSONS FARNELL & GREIN, LLP EXPENSES
July 1, 2020 through September 30, 2020

Receivership Coverage Litigation and Proceedings

Expense Type	Total
Legal Research – PACER Charges 4/1/2020 – 6/30/2020	\$ 3.00
JAMS, Inc. – Professional Services through July 31, 2020	\$ 1,413.33
Thomson Reuters – West Payment Center Legal Research through August 31, 2020	\$ 105.74
Thomson Reuters – West Payment Center Legal Research through September 30, 2020	\$ 31.81
TOTAL EXPENSES:	<u>\$ 1,553.88</u>

RECEIVER'S REPORT DATED September 30, 2020

The Receiver's September 30, 2020 report is nearly 200 pages in length and is not being reproduced with this filing.

The report can be found on the Court website under Docket #860.

The report can also be found on the website established by the Receiver for this matter at www.kccllc.net, under Court docket #860.

The report can also be obtained by email request to the Receiver's counsel, Larry Ream, at lream@schwabe.com.