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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

RICHARD VU NGUYEN, A/K/A
NGUYEN THANH VU, AND NTV
FINANCIAL GROUP, INC.,

Defendants,

and

MAI DO,

Relief Defendant.

Case No. SACV19-1174-SVW
(KESx)

**SECOND AND FINAL
APPLICATION FOR ALLOWANCE
AND PAYMENT OF FEES OF:**

**(1) JEFFREY BRANDLIN,
RECEIVER, AND BRANDLIN &
ASSOCIATES; AND**

(2) SMILEY WANG-EKVALL, LLP

DATE: October 2, 2023 ____

TIME: 1:30 p.m.

CTRM: 10A

First Street Courthouse
350 W. 1st Street,

Los Angeles, California

JUDGE: Hon. Stephen V. Wilson

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TABLE OF CONTENTS

	<u>Page</u>
I. GENERAL CASE BACKGROUND	1
A. The SEC Commenced Its Civil Enforcement Action and Sought the Appointment of the Receiver to Preserve and Recover Assets for the Benefit of the Investors NTV and the Defendants Defrauded	1
B. The Receiver Took Control of NTV's Assets, Obtained Turnover of Funds in Known Bank Accounts, and Liquidated the Remaining Investments in Brokerage Accounts to Preserve Value	2
C. The Job of the Receiver and His Professionals Was Made More Difficult and Time-Consuming Because of the Defendants' Failure to Cooperate and Their Deceitfulness.....	3
1. The Receiver Had to Create an Investor List from Documents Seized at NTV's Office	3
2. The Receiver Had to Obtain Documents from Banks and Financial Institutions Because the Defendants Did Not Maintain or Produce Them and, from the Documents Produced, Determined that the Defendants Had Lied, Forcing the SEC to Request an Expansion of the Asset Freeze to Cover Assets That Had Been Concealed.....	4
3. The Defendants Violated Court Orders to Disclose Their Assets and Dissipated \$315,000 in Refinance Proceeds Deposited Into a Concealed Bank Account	5
4. The Receiver and His Professionals Obtain a Court Order to Expand the Scope of the Receivership to Include Two Residential Properties Purchased with Investor Funds	6
5. The Receiver Sold the Three Real Properties	6
6. The Receiver Has Determined How Investor Funds Were Used and Has Increased the Amount Available for Distribution to Investors	7
D. The Claims Process Is Complete	8
II. THE FEES OF THE APPLICANTS	9

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1	A.	Summary of the Fees Requested.....	9
2	1.	Brandlin.....	9\
3	2.	SWE.....	9
4	B.	Case Administration	9
5	1.	Brandlin – General Case Administration.....	9
6	2.	Brandlin – Investor Presentation	10
7	3.	SWE.....	10
8	C.	Court Appearances	11
9	D.	Forensic Accounting.....	11
10	E.	Asset Freeze and Analysis/Liquidation	11
11	1.	Brandlin – Real Estate Evaluation	11
12	2.	SWE – Asset Analysis	12
13	F.	Investor Analysis/Claims	12
14	1.	Brandlin.....	12
15	2.	SWE.....	13
16	G.	Litigation	13
17	1.	Brandlin: Clawback Action	13
18	2.	Brandlin: Declaration Regarding the Forensic Accounting	13
19	3.	SWE.....	14
20	H.	Fee Applications.....	14
21	1.	Brandlin.....	14
22	2.	SWE.....	14
23	III.	Costs	15
24	IV.	MEMORANDUM OF POINTS AND AUTHORITIES	15
25	V.	CONCLUSION.....	16

**TO THE HONORABLE STEPHEN V. WILSON, UNITED STATES
DISTRICT JUDGE, AND ALL PARTIES IN INTEREST:**

Jeffrey Brandlin (the “Receiver”), the receiver appointed by the Court in the above-captioned action, his forensic accountants, Brandlin & Associates (the “Brandlin Firm” and, together with the Receiver, “Brandlin”), and his counsel, Smiley Wang-Ekvall (“SWE” and, together with the Receiver and the Brandlin Firm, the “Applicants”) submit their second and final application for allowance and payment of fees and costs for the period from November 1, 2021, through August 21, 2023. The Applicants are informed that the Securities & Exchange Commission has no objection to the relief sought in this application. In support of the application, the Applicants submit the following memorandum of points and authorities and the declarations of Jeffrey Brandlin and Kyra E. Andrassy in support thereof, and respectfully represent as follows:

I. GENERAL CASE BACKGROUND

A. The SEC Commenced Its Civil Enforcement Action and Sought the Appointment of the Receiver to Preserve and Recover Assets for the Benefit of the Investors NTV and the Defendants Defrauded

The Securities and Exchange Commission (“SEC”) filed a civil complaint against NTV Financial Group, Inc. (“NTV”), and its principal, Richard Nguyen, in June 2019. The SEC named Mai Do, who was at that time Mr. Nguyen’s fiancé and is now his wife, as a relief defendant because she received funds from NTV (Richard Nguyen and Mai Do are together referred to as the “Defendants”). The case was originally assigned to the Hon. Andrew Guilford, who has since retired.

1 **B. The Receiver Took Control of NTV's Assets, Obtained**
2 **Turnover of Funds in Known Bank Accounts, and**
3 **Liquidated the Remaining Investments in Brokerage**
4 **Accounts to Preserve Value**

5 By order entered on June 24, 2019, the Court granted the SEC's
6 motion for a temporary restraining order and appointed the Receiver as a
7 temporary receiver over the assets of NTV and Mr. Nguyen. The scope of
8 the receivership included all bank and brokerage accounts through which
9 investor funds flowed, including known bank accounts specifically listed in
10 the order. The Receiver and his counsel immediately took control of NTV's
11 business premises by changing the locks, redirecting the mail, taking an
12 inventory of the personal property at the location, reviewing the information
13 for leads on assets, and packing up the documents, computers, and other
14 records that remained at the location. Using information obtained from the
15 SEC, the Receiver immediately caused all of the banks and brokerage firms
16 where NTV and Richard Nguyen held accounts to be notified of the issuance
17 of the restraining order and the appointment of the Receiver and requested
18 that the banks turnover the funds on deposit to the Receiver. At that time,
19 NTV also had money invested in several brokerage accounts. After getting
20 additional information from the brokerage firms about how the money had
21 been invested, in order to minimize any further losses, the Receiver
22 instructed the brokerage firms to liquidate the investments and to remit the
23 proceeds to the Receiver. As a result of these efforts, the Receiver
24 collected \$457,460.

25 During this period, the Defendants stipulated to the entry of a
26 preliminary injunction and to the appointment of the Receiver as the
27 permanent receiver, and the Court approved that stipulation. That
28

1 stipulation marked the end of the Defendants' cooperation with the SEC and
2 the Receiver.

3 **C. The Job of the Receiver and His Professionals Was Made**
4 **More Difficult and Time-Consuming Because of the**
5 **Defendants' Failure to Cooperate and Their Deceitfulness**

6 At nearly every turn in the early days of this receivership, the
7 Defendants made things more difficult by not timely cooperating and, by our
8 estimation, lying to the Receiver and the SEC.

9 **1. The Receiver Had to Create an Investor List from**
10 **Documents Seized at NTV's Office**

11 In the early days of the case, because NTV did not use an on-line or
12 computerized accounting system to maintain investor records and Mr.
13 Nguyen was slow to provide any investor information to the Receiver, the
14 Receiver had to review the books and records that were seized in order to
15 compile a list of potential investors so that they could be given notice of the
16 appointment of the Receiver. Once the list was prepared, the Receiver
17 mailed the investors a letter in both English and Vietnamese that gave them
18 information about the receivership, the SEC's action, and directed them to a
19 website that the Receiver set up and maintains in order to provide current
20 information about the case.

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1 2. **The Receiver Had to Obtain Documents from Banks**
2 **and Financial Institutions Because the Defendants Did**
3 **Not Maintain or Produce Them and, from the**
4 **Documents Produced, Determined that the Defendants**
5 **Had Lied, Forcing the SEC to Request an Expansion of**
6 **the Asset Freeze to Cover Assets That Had Been**
7 **Concealed**

8 Although the Court ordered the Defendants to cooperate with the
9 Receiver, neither their cooperation nor accurate or truthful information was
10 forthcoming, forcing the Receiver to obtain information from banks and
11 financial institutions instead of being voluntarily provided with documents as
12 required by the Court's order. The Court also ordered the Defendants to
13 provide a detailed and complete schedule of all of their assets, including a
14 description of the sources of the assets. The schedule that they filed was
15 replete with misinformation, including lies about how real properties and two
16 luxury cars that they owned were acquired. Based on escrow files and bank
17 records obtained by service of subpoenas on third parties, the Receiver
18 determined that funds belonging to NTV funded the down payments for the
19 homes and the cars and some jewelry. In addition, when researching the
20 status of the real properties disclosed in this accounting, the Receiver
21 learned that the Defendants had recently listed one of the properties for
22 sale. The SEC and the Receiver notified their counsel that this was a
23 violation of the Court's asset freeze order and requested that they take the
24 house off the market, but they declined to do so.

25 Accordingly, the SEC was forced to move on an expedited basis for an
26 order to amend the asset freeze order to specifically include the additional
27 assets that were acquired with investor funds. The Receiver worked with
28

1 the SEC with respect to this filing and submitted a declaration in support of
2 it. Despite the evidence submitted with the application that showed that the
3 Defendants had lied about the source of funds used to acquire these assets,
4 Mr. Nguyen opposed the motion. At the initial hearing, the Court granted the
5 motion on a temporary basis and continued the matter for a final hearing in
6 order to give Mr. Nguyen additional time to obtain and review
7 documentation. The parties then stipulated to a further extension of the
8 hearing and, after much discussion, the expanded asset freeze order.

9 **3. The Defendants Violated Court Orders to Disclose**
10 **Their Assets and Dissipated \$315,000 in Refinance**
11 **Proceeds Deposited Into a Concealed Bank Account**

12 In the meantime, the SEC and the Receiver learned that the
13 accounting submitted by Mr. Nguyen and Ms. Do omitted fourteen different
14 bank and brokerage accounts. The Receiver also learned that early on in the
15 case, Ms. Do had refinanced a property and taken \$315,000 in cash out that
16 she deposited into a bank account in her name, at which time it became
17 subject to the asset freeze order. The account that she deposited them into
18 was an account that she had not disclosed and that neither the SEC nor the
19 Receiver was aware of and that appeared to have been opened for the
20 purpose of receiving and then distributing the refinance proceeds for various
21 personal purposes. Because of their blatant disregard for Court orders, the
22 SEC moved for an order to show cause why the Defendants should not be
23 held in contempt of Court. The Receiver prepared a detailed declaration in
24 support of that motion. The Defendants opposed that motion. Ultimately,
25 the Court ordered them to file declarations about their bank and brokerage
26 accounts and the disposition or whereabouts of certain assets. The
27
28

1 Receiver also served subpoenas on financial institutions to trace the funds
2 from the refinance.

3 **4. The Receiver and His Professionals Obtain a Court**
4 **Order to Expand the Scope of the Receivership to**
5 **Include Two Residential Properties Purchased with**
6 **Investor Funds**

7 After the Defendants were forced to provide additional disclosures, the
8 Receiver filed a motion to formally bring the two properties in Santa Ana,
9 fine jewelry, and the cars into the receivership estate because the assets
10 had been acquired with funds belonging to NTV. The Applicants then
11 learned that Mr. Nguyen and Ms. Do had sold the cars and jewelry, in
12 violation of Court orders. The Applicants also determined from documents
13 produced by various financial institutions that the funds from the refinance
14 had been completely dissipated. Mr. Nguyen and Ms. Do opposed this
15 motion and submitted evidentiary objections that were overruled. The Court
16 granted the motion, but since only the two real properties remained and the
17 cash from the sale of the cars and jewelry had been spent, only the two
18 homes were formally brought into the receivership estate.

19 **5. The Receiver Sold the Three Real Properties**

20 The Receiver then turned to administration of the estate. He obtained
21 Court approval to retain brokers to market an office condominium and the
22 two residential properties in Santa Ana as well as approval of the bidding
23 procedures for the sale of the three properties. The Receiver sold all three
24 properties, generating net proceeds of \$311,359 for the receivership estate.
25 Using the results of the forensic accounting performed by the Applicants, the
26 Receiver identified payments that were made with funds traceable to
27 investors for non-business purposes and, with Court approval, retained
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1 special litigation counsel on a contingency fee basis to pursue these actions.
2 Through August 15, 2023, these efforts had generated net recoveries of
3 \$469,412.64 for the receivership estate.

4 **6. The Receiver Has Determined How Investor Funds**
5 **Were Used and Has Increased the Amount Available**
6 **for Distribution to Investors**

7 With respect to the investors, the Receiver analyzed the bank records
8 to verify the amount each investor put in and the amount some of them
9 received from NTV. The Applicants have determined that NTV raised a total
10 of \$3,053,000 from non-insider investors and returned \$1,119,590 to
11 investors, leaving non-insider investors with a balance owed of \$1,933,410.¹

12 As set forth above, the Receiver obtained \$457,460.00 from bank
13 accounts and investment accounts. As a result of the efforts of the Receiver
14 and his professionals, the Receiver added \$311,359 from the recovery and
15 sale of real properties, and \$469,412.64 in net recoveries to date from
16 litigation.

17 By order entered on March 14, 2022, the Court previously allowed the
18 Receiver and his firm fees of \$221,206.25 and costs of \$1,142.81,
19 authorizing 80% of the fees to be paid at that time and all of the costs. The
20 amount remaining to be paid is \$44,241.25. The Court allowed SWE legal
21 fees of \$192,638.20 and costs of \$16,275.54, authorizing payment of 80% of
22 the legal fees at that time and all of the costs. The amount remaining to be
23 paid is \$38,527.64. As of August 15, 2023, and after payment of ordinary
24 expenses of the administration of the estate, the Receiver is holding
25 \$885,038.

26
27 ¹ These figures are based on the claims that were submitted to the Receiver and vary slightly from the Receiver's
28 earlier calculations based on his analysis of bank and brokerage statements. If the claim of the insider, Michelle
Nguyen, is included, then the total raised was \$3,055,200, the total paid out was \$1,164,135, and the net investment
would be \$1,888,865. Again, these figures are based on the claims submitted.

1 A snapshot of the results of the Receiver's administration of the estate
2 through August 15, 2023, is as follows:

3 Amount recovered from bank accounts and liquidation of investments	\$457,460
4 Amount realized from the sale of the three real properties, net of expenses of sale	\$311,359
5 Clawback litigation net recoveries to date	\$469,412.64
6 Miscellaneous deposits	\$1,660
7 Less costs of the receivership, including professional fees and costs paid to date, locksmith fees, website hosting fees, postage, etc.	<\$355,188>
8 Ending Cash balance as of August 15, 2023	\$884,703

9
10 **D. The Claims Process Is Complete**

11 In March 2022, the Court approved the Receiver's proposed claim
12 procedures. The Receiver then distributed the claim packages to investors
13 and creditors, with a claims bar date of August 15, 2022. Investors,
14 including an insider, filed claims with a net investment of \$1,891,065 after
15 discrepancies were resolved. If the insider's claim is excluded, the net
16 investment was \$1,933,410.

17 At present and including the fees and costs of the Applicants as set
18 forth in this Application and as estimated through the end of the
19 receivership, the Receiver is estimating a return to investors of
20 approximately 40.66% of their net investment. Had the Receiver not been
21 appointed and the funds on hand distributed to investors outside of a
22 receivership, the investors would have received a return of approximately
23 23.66% of their net investment.² The Receiver's motion for authorization to
24 make a distribution to investors is being filed concurrently with this
25 Application.

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27
28 ² This is calculated by dividing the funds and investments in bank and brokerage accounts as of the date of the Receiver's appointment, totaling \$457,460, by the total net investments of the investors, which is \$1,933,410.

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1 **II. THE FEES OF THE APPLICANTS**

2 **A. Summary of the Fees Requested**

3 **1. Brandlin**

4 From November 1, 2021, through August 21, 2023, Brandlin has
5 incurred fees totaling \$132,019. These fees reflect a 22% discount off of
6 their normal hourly rates. In addition, the Receiver and his firm are
7 voluntarily reducing their fees by \$15,000 as a courtesy and to increase the
8 amount available for investors. Thus, the total amount the Receiver and his
9 firm are seeking in this Application is \$117,019, resulting in a total discount
10 off of their normal rates of 31%.

11 The Standardized Fund Accounting Report for the term of the
12 receivership, which is required by the SEC to be attached to the fee
13 application, is provided as Exhibit "1" and Brandlin's invoice is attached as
14 Exhibit "2."

15 **2. SWE**

16 From November 1, 2021, through August 21, 2023, SWE has incurred
17 legal fees of \$27,388.35 and costs of \$5,098.61. These fees reflect a 10%
18 discount off of their normal hourly rates. In addition, SWE is voluntarily
19 reducing its fees by \$5,000 as a courtesy and to increase the amount
20 available for investors. Thus, the total amount SWE is seeking in this
21 Application is \$27,486.96. SWE's invoice is attached as Exhibit "3."

22 **B. Case Administration**

23 **1. Brandlin – General Case Administration**

24 Brandlin incurred \$2,158.00 in fees in this category for 4.9 hours of
25 work during the Application Period analyzing the treatment of parties who
26 permitted Richard Nguyen to trade within their accounts and whether they
27 should be treated the same as investors who put money into NTV. Brandlin
28

1 also incurred some time communicating with the SEC about the case and
2 about the calculation of the disgorgement figures for the defendants.

3 Brandlin also fielded routine inquiries from investors that it has not
4 billed for and that are not reflected in the attached invoice.

5 **2. Brandlin – Investor Presentation**

6 Brandlin incurred fees of \$16,345.50 for 31.65 hours of work preparing
7 for and hosting an investor presentation. In December 2021, Brandlin
8 hosted a Zoom meeting with the investors where he presented the findings
9 from the forensic accounting. In preparation for that meeting, Brandlin
10 prepared a Power Point presentation to educate the investors about what
11 happened with the money that they had invested, what actions the Receiver
12 was taking to recover funds, and what the Receiver estimated the return
13 would be. Investors were also given an opportunity to present questions.
14 The Power Point was then posted on the receivership website for any
15 investors unable to attend the Zoom meeting.

16 **3. SWE**

17 SWE incurred \$5,896.80 in fees in this category for 15.5 hours of work
18 assisting the Receiver with preparation of the status report, preparing for an
19 investor meeting, and assisting the SEC with determining the amount of
20 investor losses in this case. SWE also fields communications from investors
21 with questions about the status of the case and the next steps and does not
22 charge for routine investor communications. In addition, where the services
23 in this category are more administrative in nature than they are legal, SWE
24 has not charged for those services. Of the 15.5 hours incurred in this
25 category, 4.30 were at no charge to the estate.

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1 **C. Court Appearances**

2 Brandlin incurred \$1,300.00 in fees for 2.5 hours in connection with
3 this attendance in Court for the first interim fee application and the motion for
4 approval of the claim procedures, both of which were granted.

5 **D. Forensic Accounting**

6 Brandlin incurred \$38,922 in fees for 74.85 hours of work completing a
7 forensic accounting. Because NTV maintained no accounting system, the
8 Receiver had to reconstruct the books and records from bank records,
9 brokerage statements, and credit card statements in order to identify
10 investors, quantify the amounts they put in and received back, and how NTV
11 used their funds. These efforts resulted in bringing the two residential
12 properties into the estate and formed the basis for the clawback actions that
13 the Receiver successfully pursued. In addition, because neither Richard
14 Nguyen nor Mai Do have cooperated with the Receiver or the SEC, they
15 also formed the basis for the declaration that the Receiver has prepared at
16 the request of the SEC to quantify the amount of the disgorgement
17 judgments that the SEC is in the process of seeking against Richard Nguyen
18 and Mai Do. These efforts are a critical component of a receivership and
19 formed the basis for the increased return to investors.

20 **E. Asset Freeze and Analysis/Liquidation**

21 **1. Brandlin – Real Estate Evaluation**

22 Brandlin incurred \$832.00 for 1.6 hours of work in connection with
23 accounting issues related to the real property transactions and to determine
24 how the amounts recovered should be credited against the amounts to be
25 disgorged by the Defendants.

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1 **2. SWE – Asset Analysis**

2 SWE incurred fees of \$2,917.80 for 6.80 hours of work in the asset
3 analysis category in this application period filling in gaps in the financial
4 records by issuing subpoenas to financial institutions for the production of
5 documents. These records were important to the clawback actions because
6 they assisted the Receiver and his special litigation counsel in identifying
7 payments that NTV made on debts owed by Richard Nguyen or Mai Do for
8 which NTV was not liable.

9 **F. Investor Analysis/Claims**

10 **1. Brandlin**

11 Brandlin incurred \$19,105.25 in fees for 39.70 hours of work in this
12 category in connection with the establishment and approval of the
13 Receiver's claim procedures. The Receiver utilized the forensic accounting
14 to assist in the preparation of pre-filled out claim forms that investors could
15 simply sign if they agreed with the figures, which most did. This made the
16 claims process more efficient. As claims came in, the Receiver logged and
17 reviewed them and reached out to investors to resolve discrepancies
18 between the Receiver's calculations and the investor's records. All disputes
19 were resolved informally.

20 Once the claims were reviewed, the Receiver analyzed them to
21 determine the best distribution methodology. Because many investors had
22 received some distributions but there were significant differences in the
23 amounts, the Receiver determined that the rising tide methodology was the
24 preferred method.

25 This process was critical to the preparation of the motion to distribute
26 funds and the calculations that support that motion.

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1 **2. SWE**

2 SWE incurred \$15,941.25 in fees for \$47.60 hours of work in this
3 category in connection with the completion of the motion to approve the
4 proposed claim procedures, which the Court granted in March 2022. SWE
5 then incurred fees in connection with service of the notice of the deadline to
6 submit claims and the claims packages, responding to investor inquiries
7 regarding the claim process, and assisting the Receiver with resolution of
8 discrepancies between the receivership records and filed claims. SWE also
9 incurred fees in connection with the preparation of the motion to approve the
10 distribution to investors that is being set concurrently with this Application.
11 SWE did not charge for fielding question from investors about the claim
12 forms or for performing purely administrative tasks in connection with the
13 claim process.

14 **G. Litigation**

15 **1. Brandlin: Clawback Action**

16 Brandlin spent \$7,478 in fees for 16.20 hours of work in this category
17 providing information requested by special litigation counsel in connection
18 with their clawback actions, evaluating settlement offers and formulating
19 counteroffers, and reviewing and approving settlement agreements. As set
20 forth above, the clawback actions generated substantial recoveries for the
21 estate.

22 **2. Brandlin: Declaration Regarding the Forensic**
23 **Accounting**

24 Brandlin incurred \$49,400 in fees for 95 hours of work in connection
25 with the calculation and allocation of the disgorgements by Richard Nguyen
26 and Mai Do and his preparation of a declaration to support that. Because
27 the SEC's efforts to resolve its claims against Richard Nguyen and Mai Do
28

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1 informally have been rebuffed, the Receiver understands that the SEC is in
2 the process of preparing a motion to establish their liability and to fix their
3 disgorgement and penalty amounts. Because the Receiver had
4 reconstructed NTV's books records, rather than recreate the wheel, the SEC
5 has utilized the Receiver's knowledge to assist it with its calculations. The
6 time spent in this category was to provide the required detailed backup for
7 the figures in the Receiver's analysis and then to put these figures into the
8 form of a declaration. Because of the number of accounts and the volume of
9 transactions, providing the detail was not an easy effort but it is a necessary
10 one in order to avoid providing a basis for objection by Richard Nguyen or
11 Mai Do. The Receiver understands that this declaration is nearly complete
12 and expects that it will be useful to the resolution of the claims in the
13 underlying litigation by the SEC against Richard Nguyen and Mai Do.

14 **3. SWE**

15 SWE incurred \$2,632.50 in fees for 5 hours of work assisting the
16 Receiver with his declaration on the forensic accounting that is intended to
17 be used by the SEC to fix the amount of the disgorgement judgment against
18 Richard Nguyen and Mai Do.

19 **H. Fee Applications**

20 **1. Brandlin**

21 Brandlin spent 12.4 hours of work in this category coding billing entries
22 and monitoring the amount of time and fees incurred in connection with this
23 case. As required by the SEC, the Applicants have not charged for time
24 incurred in connection with fee applications.

25 **2. SWE**

26 SWE incurred 9.90 hours in this category in connection with the first
27 interim fee application. In accordance with the SEC's Billing Guidelines,
28

1 SWE has not charged the receivership estate for time incurred in this
2 category and is not charging for preparation of this Application.

3
4 **III. Costs**

5 SWE incurred expenses of \$5,098.61, mostly in connection with the
6 service of notices, the claims packages, and publication of the notice of the
7 deadline to submit claims. SWE also incurred fees in connection with
8 translators in order to translate communications into Vietnamese or English,
9 as necessary. SWE also incurred the cost of the translator who participated
10 in the Zoom investor meeting in order to translate the Receiver's
11 presentation into Vietnamese in real time.

12
13 **IV. MEMORANDUM OF POINTS AND AUTHORITIES**

14 It is a general rule that the fees and expenses of a receivership are a
15 charge against the property administered. *See Gaskill v. Gordon*, 27 F.3d
16 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of
17 the Receiver and of his or her professionals. Decisions about the timing and
18 amount of an award are committed to the sound discretion of the Court. *See*
19 *SEC v. Elliot*, 953 F.2d 15690, 1577 (11th Cir. 1992).

20 In determining whether to allow fees, courts consider "the time, labor
21 and skill required . . . in the proper performance of the duties imposed by the
22 court upon the receivers, the fair value of such time, labor and skill
23 measured by conservative business standards, the degree of activity,
24 integrity and dispatch with which the work is conducted and the result
25 obtained." *Coskery v. Roberts & Mander Corp.*, 200 F.2d 150, 154 (3d Cir.
26 1952). No single factor is dispositive and a reasonable fee is based on all of
27 the circumstances of the receivership.

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1 The Applicants have provided necessary services to NTV's investors,
2 although it is an unfortunate reality that the Defendants' pattern of
3 deceitfulness increased the costs of the receivership. Despite their efforts to
4 thwart the Receiver's efforts, the Receiver was able to bring two properties
5 into the receivership estate for the benefit of investors, to prevent further
6 investment losses in the brokerage accounts by promptly liquidating the
7 accounts, and to recover hundreds of thousands of dollars in personal
8 expenses that were paid by NTV using investor funds. The Receiver's
9 efforts have increased the distribution to investors by approximately 16%.

10 The Applicants have submitted detailed invoices that describe the
11 nature of the services rendered and the identity and billing rate of the
12 professionals performing each task. The efforts of the Applicants have
13 together resulted in the recovery of additional assets for the benefit of the
14 investors and will provide a mechanism for a partial recovery for the
15 investors who were defrauded by NTV. The Applicants are mindful that
16 work in federal equity receiverships is a public service, and because of that
17 and in order to provide additional funds to investors, they have agreed to a
18 voluntary reduction of their fees by \$15,000 for the Receiver and his firm and
19 by \$5,000 for SWE. This is in addition to the discounted hourly rates that
20 they have charged for their services throughout the case.

21
22 **V. CONCLUSION**

23 WHEREFORE, the Applicants respectfully request that this Court enter
24 its order:

25 1. Allowing \$117,019.00 in fees to the Receiver and the Brandlin
26 Firm on a final basis for the period from November 1, 2021, through August
27 21, 2023;

2. Allowing \$22,388.35 in fees and \$5,098.61 in costs to SWE on a final basis for the period from November 1, 2021, through August 21, 2023;

3. Authorizing the payment of the above amounts as well as the heldback amounts of \$44,241.25 for Brandlin and \$38,527.64 for SWE; and

4. For such further relief as the Court may deem necessary and appropriate.

Respectfully submitted,

DATED: September 1, 2023 SMILEY WANG-EKVALL, LLP

By: /s/ Kyra E. Andrassy
Kyra E. Andrassy
Counsel for Jeffrey E. Brandlin,
Receiver

DECLARATION OF JEFFREY E. BRANDLIN

I, Jeffrey E. Brandlin, declare as follows:

1. I know the facts contained in this declaration to be true of my own personal knowledge and, if called as a witness, could and would competently testify with respect thereto.

2. I am the permanent receiver appointed with respect to NTV Financial Group, Inc. and certain assets and bank accounts held by or for the benefit of Richard Nguyen and Mai Do. I am also the founding partner of Brandlin & Associates (the "Firm"), which I obtained Court approval to retain as the estate's forensic accountants. I make this declaration in support of the second and final fee application for my fees and the Firm's fees (the "Application") for the period from November 1, 2021, through August 21, 2023. Unless otherwise defined in this declaration, all terms defined in the Application are incorporated herein by this reference.

3. Attached hereto as Exhibit "1" is the Schedule of Cash Receipts and Disbursements for the period from November 1, 2021, through the present.

4. In the ordinary course of its business, the Firm keeps a record of all time expended by its professionals and para-professionals in the rendering of professional services on a computerized billing system as follows: At or near the time the professional services are rendered, attorneys and other professionals of the Firm record (a) the description of the nature of the services performed, (b) the duration of the time expended, and (c) the client/matter name or number by either: (1) writing such information on a time sheet, or (2) inputting such information directly into the Firm's computer billing system. For the professionals who record their time using written time sheets, the information contained in the time sheets is

SMILEY WANG-EKVALL, LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Tel 714 445-1000 • Fax 714 445-1002

1 then transcribed into the Firm's computer billing system. The Firm's
2 computer billing system keeps a record of all time spent on a client/matter,
3 the professional providing the services and a description of the services
4 rendered. The Firm's computer billing system automatically multiplies the
5 time expended by each professional by the respective professional's billing
6 rate to calculate the amount of the fee. The Firm conducts its business in
7 reliance on the accuracy of such business records.

8 5. I have reviewed my bill and the entries for the Firm and attach a
9 true and correct copy of the entries as Exhibit "2."

10 6. It is the Firm's usual practice to allocate work and assignments in
11 an efficient manner to achieve an effective result. As demonstrated in the
12 Application, the practice has been followed in this case. In some cases,
13 such allocation is not feasible, so for tasks that are purely secretarial in
14 nature and that require no particular expertise, we have reduced the billing
15 rate to the lowest rate charged by the Firm, regardless of which professional
16 performed the task.

17 7. Because this is a receivership, we have discounted our normal
18 hourly rates by an average of 22%. In addition, mindful that receiverships
19 are a form of public service and to increase the amount available to
20 investors, my counsel and I have each agreed to a voluntary fee reduction. I
21 have agreed to a \$15,000 reduction. Thus, the total discount off of our
22 normal rates is 31%.

23 8. To the best of my knowledge, information and belief, the facts

24 \\
25 \\
26 \\
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28

1 set forth in the Application are true and correct.

2 I declare under penalty of perjury under the laws of the United States
3 of America that the foregoing is true and correct.

4 Executed on this 31st day of August 2023, at Los Angeles, California.

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7 JEFFREY E. BRANDLIN
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DECLARATION OF KYRA E. ANDRASSY

I, Kyra E. Andrassy, declare as follows:

1. I am a partner with Smiley Wang-Ekvall, LLP, attorneys of record for Jeffrey E. Brandlin, Receiver. I am licensed to practice before this Court and the courts of the State of California. I know each of the following facts to be true of my own personal knowledge, except as otherwise stated and, if called as a witness, I could and would competently testify with respect thereto. I make this declaration in support of the second and final application ("Application") for fees in the receivership of NTV Financial Group, Inc. Unless otherwise defined in this declaration, all terms defined in the Application are incorporated herein by this reference.

2. Attached hereto as Exhibit "3" is a true and correct copy of the Firm's invoice from November 1, 2021, through August 21, 2023.

3. In the ordinary course of its business, the Firm keeps a record of all time expended by its professionals and para-professionals in the rendering of professional services on a computerized billing system as follows: At or near the time the professional services are rendered, attorneys and other professionals of the Firm record (a) the description of the nature of the services performed, (b) the duration of the time expended, and (c) the client/matter name or number by either: (1) writing such information on a time sheet, or (2) inputting such information directly into the Firm's computer billing system. For the professionals who record their time using written time sheets, the information contained in the time sheets is then transcribed into the Firm's computer billing system. The Firm's computer billing system keeps a record of all time spent on a client/matter, the professional providing the services and a description of the services rendered. The Firm's computer billing system automatically multiplies the

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1 time expended by each professional by the respective professional's billing
2 rate to calculate the amount of the fee. The Firm conducts its business in
3 reliance on the accuracy of such business records.

4 4. It is the Firm's usual practice to allocate work and assignments in
5 an efficient manner to achieve an effective result. As demonstrated in the
6 Application, the practice has been followed in this case. In addition, we do
7 not charge for routine communications with investors or for other purely
8 administrative tasks.

9 5. Because this is a receivership, we have discounted our normal
10 hourly rates by 10%. In addition, mindful that receiverships are a form of
11 public service and to increase the amount available to investors, the
12 Receiver and I have each agreed to a voluntary fee reduction. I have
13 agreed to a \$5,000 reduction.

14 6. To the best of my knowledge, information and belief, the facts
15 set forth in the Application are true and correct.

16 I declare under penalty of perjury under the laws of the United States
17 of America that the foregoing is true and correct to the best of my
18 knowledge.

19 Executed on this 1st day of September, 2023, at Costa Mesa,
20 California.

21
22 /s/ Kyra E. Andrassy

23 Kyra E. Andrassy
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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 11-6.2

The undersigned counsel, counsel of record for Jeffrey E. Brandlin, Receiver, certifies that this application contains 4,341 words, which complies with the word limit of L.R. 11-6.1.

DATED: September 1, 2023 SMILEY WANG-EKVALL, LLP

By: /s/ Kyra E. Andrassy

Kyra E. Andrassy
Michael L. Simon
Counsel for Jeffrey E. Brandlin,
Receiver

SMILEY WANG-EKVALL, LLP
3200 Park Center Drive, Suite 250
Costa Mesa, California 92626
Tel 714 445-1000 • Fax 714 445-1002

EXHIBIT "1"

STANDARDIZED FUND ACCOUNTING REPORT for {Name of Fund} - Cash Basis

Receivership; Civil Court Docket No.

Reporting Period MM/DD/YYYY to MM/DD/YYYY or Final Report Dated MM/DD/YYYY

11/01/2021 - 08/15/2023

FUND ACCOUNTING (See Instructions):				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of MM/DD/YYYY): 11/01/2021			\$1,020,092.13
	Increases in Fund Balance:			
Line 2	Business Income			
Line 3	Cash and Securities	\$1,020,092.13		
Line 4	Interest/Dividend Income	\$9,772.12		
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation	\$201.83		
Line 7	Third-Party Litigation Income	\$239,454.03		
Line 8	Miscellaneous - Other			\$1,269,520.11
	Total Funds Available (Lines 1 - 8):			
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals	\$348,604.90	\$3,431.67	
Line 10b	Business Asset Expenses			
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees	\$32,780.40		
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses			
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			\$384,816.97
	Total Disbursements for Receivership Operations			
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator.....			
	Independent Distribution Consultant (IDC).....			
	Distribution Agent.....			
	Consultants.....			
	Legal Advisers.....			
	Tax Advisers.....			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses			
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator.....			
	IDC.....			
	Distribution Agent.....			
	Consultants.....			
	Legal Advisers.....			
	Tax Advisers.....			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice/Publishing Approved Plan.....			
	Claimant Identification.....			
	Claims Processing.....			
	Web Site Maintenance/Call Center.....			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursements for Distribution Expenses Paid by the Fund			
Line 12	Disbursements to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other:			
	Total Funds Disbursed (Lines 9 - 11):			
Line 13	Ending Balance (As of MM/DD/YYYY): 08/15/2023			\$884,703.14

STANDARDIZED FUND ACCOUNTING REPORT for {Name of Fund} - Cash Basis

Receivership; Civil Court Docket No.

Reporting Period MM/DD/YYYY to MM/DD/YYYY or Final Report Dated MM/DD/YYYY

11/01/2021 - 08/15/2023

Line 14	Ending Balance of Fund – Net Assets:			
Line 14a	Cash & Cash Equivalents			
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund – Net Assets	Cash		\$885,037.84

OTHER SUPPLEMENTAL INFORMATION:				
		Detail	Subtotal	Grand Total
Line 15	Report of Items NOT To Be Paid by the Fund:			
	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 15a	Plan Development Expenses Not Paid by the Fund:			
	1. Fees:			
	Fund Administrator.....			
	IDC.....			
	Distribution Agent.....			
	Consultants.....			
	Legal Advisers.....			
	Tax Advisers.....			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses Not Paid by the Fund			
Line 15b	Plan Implementation Expenses Not Paid by the Fund:			
	1. Fees:			
	Fund Administrator.....			
	IDC.....			
	Distribution Agent.....			
	Consultants.....			
	Legal Advisers.....			
	Tax Advisers.....			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice/Publishing Approved Plan.....			
	Claimant Identification.....			
	Claims Processing.....			
	Web Site Maintenance/Call Center.....			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. FAIR Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund			
Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			
Line 16	Disbursements to Court/Other Not Paid by the Fund:			
Line 16a	Investment Expenses/CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund:			
Line 17	DC & State Tax Payments			
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period.....			
Line 18b	# of Claims Received Since Inception of Fund.....			
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period.....			
Line 19b	# of Claimants/Investors Paid Since Inception of Fund.....			

Receiver:

 By: Jeffrey E. Brandlin
 (signature)

Jeffrey E. Brandlin

(printed name)

President - Brandlin & Associates

(title)

8/31/2023

Date: _____

EXHIBIT "2"

Brandlin Associates
#3132
NTV Financial Group, Inc.

Detailed Fees
10/28/21 - 8/22/23

	A	B	C	D	E	F	G	H	I	J	K	L
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								HRS		Gross Fees		Discounted Fees	
								Totals	274.80	\$ 169,084.50		\$ 132,019	

No.	Date	Person	Initial	Code	Classification	Classification Description	Time	Amount	Gross Rate	Discounted	
										Rate	Fees
1	11/22/21	Bell, David	DRB	O	NTV Investor Presentation	Prepared initial draft of NTV Investor Presentation (12 page PowerPoint) (11/22/21). Preparation of various charts and schedules to include in the presentation. Discussions with Jeff Brandlin regarding initial draft.	7.50	\$ 4,462.50	595.00	\$ 505	\$ 3,788
2	11/23/21	Brandlin, Jeff	JEB	D	Forensic Accounting	Review dec of Maria Rodriguez re funds raised from investors, tracing deposits into various brokerage & bank accounts, tracing transfers between bank & brokerage accounts, identifying the nature of other receipts - Advisory fees, Merchant bankcard, construction, etc. Also traced the payments 7 transfers out of the bank accounts into brokerage accounts, used by D's for personal use, cash, non-investor related, credit card payments, West Coast Escrow and unknown. Also reviewed the amounts under capitalized in the brokerage accounts based on Investor deposits.	4.60	\$ 2,990.00	650.00	\$ 520	\$ 2,392
3	11/24/21	Bell, David	DRB	O	NTV Investor Presentation	Updated NTV Investor Presentation (11/24/21). Created additional slide for the presentation. Discussions with Jeff Brandlin. Revised bullet points, slide order and other.	5.50	\$ 3,272.50	595.00	\$ 520	\$ 2,860
4	11/24/21	Brandlin, Jeff	JEB	P	Investor Claim Forms	Review, edit and discuss with Kyra the Order approving Claim Forms, Bar Date for Claims, Summary Claims Procedures & Dec of JEB re same and reconciling amounts presented to the NTV Summary Excel file.	2.70	\$ 1,755.00	650.00	\$ 520	\$ 1,404
5	11/25/21	Brandlin, Jeff	JEB	P	Investor Claim Forms	Reviewed & analyzed investor net investments to streamline preparation of claims.	2.60	\$ 1,690.00	650.00	\$ 520	\$ 1,352
6	11/25/21	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	2.60	\$ 1,690.00	650.00	\$ 520	\$ 1,352
7	11/26/21	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Draft Declaration for the SEC regarding losses attributable to Richard Nguyen. Began preparing supporting exhibits.	6.70	\$ 4,355.00	650.00	\$ 520	\$ 3,484
8	11/26/21	Brandlin, Jeff	JEB	D	Forensic Accounting	Revise declaration & supporting schedules re Net Losses Associated with Richard Nguyen & Mai Do prepared at the request of the SEC. Note there were 3-4000 transactions to be reviewed & considered, 30 different categories of revenues and expenses to be identified summarized & reconciled to the Receivership sources & uses activity. Adjusted amounts for recoveries received to-date and balanced to the cash on hand.	6.50	\$ 4,225.00	650.00	\$ 520	\$ 3,380
9	11/27/21	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Modify declaration & supporting schedules re Net Losses Associated with Richard Nguyen & Mai Do. Note there were 30 different categories of revenues and expenses to be identified summarized & reconciled to the sources & uses of the receivership activity adjusted for the recoveries received to date and balanced to the cash on hand.	7.90	\$ 5,135.00	650.00	\$ 520	\$ 4,108
10	11/28/21	Brandlin, Jeff	JEB	D	Forensic Accounting	Reviewed money transfers between bank and brokerage accounts. Investigated multiple categories of transactions between Defendant's personal and business-related accounts. Refined schedules, footnotes, schematics and other. The nature of the work was evolving and ongoing for investigation purposes.	6.70	\$ 4,355.00	650.00	\$ 520	\$ 3,484
11	11/29/21	Bell, David	DRB	O	NTV Investor Presentation	Updated NTV Investor Presentation (11/29/21). Discussions with Jeff Brandlin & Kyra Andrassy. Revised presentation as requested.	2.50	\$ 1,487.50	595.00	\$ 520	\$ 1,300
12	11/29/21	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Review dec for Doug Miller and review with DRB to craft all the supporting data to support amount to be disgorged by Richard Nguyen.	2.30	\$ 1,495.00	650.00	\$ 520	\$ 1,196
13	11/29/21	Brandlin, Jeff	JEB	O	NTV Investor Presentation	Prepare edit & discuss ppt presentation with DRB. Review and edit and reconcile amounts to supporting excel files. Zoom call with counsel & DRB to go over ppt. Do a "dry run" in anticipation of webinar on 12/2/21.	4.60	\$ 2,990.00	650.00	\$ 520	\$ 2,392
14	11/30/21	Bell, David	DRB	O	NTV Investor Presentation	Updated NTV Investor Presentation (11/30/21). Discussions with Jeff Brandlin & Kyra Andrassy. Revised presentation as requested. Finalized presentation and Jeff Brandlin notes to the presentation.	2.25	\$ 1,338.75	595.00	\$ 520	\$ 1,170

Brandlin Associates
#3133
NTV Financial Group, Inc.
Detailed Fees
10/28/21 - 8/22/23

	A	B	C	D	E	F	G	H	I	J	K	L
513	15	11/30/21	Hogan, Natalie	NH	P	Investor Claim Forms	Reviewed investors and creditors claims process. Reconciled amounts to supporting excel files.	2.30	\$ 345.00	150.00	\$ 125	\$ 288
514	16	12/1/21	Brandlin, Jeff	JEB	D	Forensic Accounting	Continued research & substantiation regarding Net Losses attributable to Richard Nguyen and Mai Do. Note there were 3-4000 transactions to be reviewed & considered, 30 different categories of revenues and expenses to be identified summarized & reconciled to the Receivership sources & uses activity. Adjusted amounts for recoveries received to-date and balanced to the cash on hand.	4.90	\$ 3,185.00	650.00	\$ 520	\$ 2,548
515	17	12/1/21	Brandlin, Jeff	JEB	D	Forensic Accounting	Continued research & substantiation regarding Net Losses attributable to Richard Nguyen and Mai Do. Note there were 3-4000 transactions to be reviewed & considered, 30 different categories of revenues and expenses to be identified summarized & reconciled to the Receivership sources & uses activity. Adjusted amounts for recoveries received to-date and balanced to the cash on hand.	3.25	\$ 2,112.50	650.00	\$ 520	\$ 1,690
516	18	12/2/21	Bell, David	DRB	O	NTV Investor Presentation	Assisted Jeff Brandlin with preparing for the NTV Investor Presentation. Pre-call with Kyra Andrassy. Reviewed notes.	0.70	\$ 416.50	595.00	\$ 520	\$ 364
517	19	12/2/21	Bell, David	DRB	O	NTV Investor Presentation	Assisted Jeff Brandlin with the NTV Presentation (Zoom Meeting 6:00PM - 7:00PM). Controlled screen and presentation pages.	1.00	\$ 595.00	595.00	\$ 520	\$ 520
518	20	12/2/21	Brandlin, Jeff	JEB	O	NTV Investor Presentation	Prep for Investor Webinar, scheduled for 12/2/21 (~3.7hrs). Update various ppt schedules, finalize script and various meeting with DRB re changes and correction (~ 2.6). CCW Kyra Andrassy to review presentation and work out last minute kinks (.5). Finalize script and present the webinar to investors (~ 1.5hrs).	7.60	\$ 4,940.00	650.00	\$ 520	\$ 3,952
519	21	12/3/21	Brandlin, Jeff	JEB	D	Forensic Accounting	Reconciliation of monies diverted by Richard Vu & Mai Do.	2.40	\$ 1,560.00	650.00	\$ 520	\$ 1,248
520	22	12/6/21	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Finalize JEB declaration for disgorgement. Conversion to PDF, linked and traced list of disgorgement items to supporting exhibits. Transmitted declaration & exhibits to Doug Miller.	2.60	\$ 1,690.00	650.00	\$ 520	\$ 1,352
521	23	12/13/21	Brandlin, Jeff	JEB	E	Litigation / Preferences	Consider and respond to Watches of Switzerland's proposal to settle for \$20K on \$78K claim plus interest.	0.70	\$ 455.00	650.00	\$ 520	\$ 364
522	24	12/13/21	Brandlin, Jeff	JEB	E	Litigation / Preferences	Develop detailed analysis of Mai Do's activity and use of NTV investor funds for Clawback litigation.	2.30	\$ 1,495.00	650.00	\$ 520	\$ 1,196
523	25	12/27/21	Brandlin, Jeff	JEB	E	Litigation / Preferences	Discussion with various counsel regarding proposed counter offer to Watches of Switzerland. No counter offer made after debated consideration.	0.30	\$ 195.00	650.00	\$ 520	\$ 156
524	26	12/28/21	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Analysis based on Doug Miller's email on Richard Nguyen's disgorgement & the inclusion and strategy to incorporate Mai Do's disgorgement in same declaration, as well as including pre-judgment interest for each.	2.40	\$ 1,560.00	650.00	\$ 520	\$ 1,248
525	27	1/5/22	Bell, David	DRB	Q	Richard Nguyen Declaration	Reviewed and assisted Jeff Brandlin with Jeffrey E. Brandlin Declaration. Performed research, assisted in tracing and verifying amounts and other.	3.50	\$ 2,082.50	595.00	\$ 520	\$ 1,820
526	28	1/5/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Total due \$78K + \$16K of prejudgment interest. Decline to drop to 95% of \$65K. Proposed \$90K.	0.40	\$ 260.00	650.00	\$ 520	\$ 208
527	29	1/11/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	CCW Kyra re treatment of disgorgement amounts from Richard Nguyen & Mai Do based on Doug Miller's email.	0.50	\$ 325.00	650.00	\$ 520	\$ 260
528	30	1/11/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Review of Post Judgment Agreement with Michelle Nguyen.	0.50	\$ 325.00	650.00	\$ 520	\$ 260
529	31	1/12/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	CCW Doug Miller (.4) Kyra Andrassy (.1) re disgorgement amounts for Richard Nguyen & Mai Do.	0.50	\$ 325.00	650.00	\$ 520	\$ 260
530	32	1/12/22	Hogan, Natalie	NH	P	Investor Claim Forms	Continued review of investor net investment documents to facilitate claim form participation.	2.20	\$ 330.00	150.00	\$ 125	\$ 275
531	33	1/17/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Modified JEB declaration & supporting schedules (Net Losses Associated with Richard Nguyen & Mai Do) per the request of the SEC.	2.20	\$ 1,430.00	650.00	\$ 520	\$ 1,144
532	34	1/13/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Reconciliation of monies diverted by Richard Vu & Mai Do.	2.20	\$ 1,430.00	650.00	\$ 520	\$ 1,144

Brandlin Associates
#3134
NTV Financial Group, Inc.

Detailed Fees
10/28/21 - 8/22/23

	A	B	C	D	E	F	G	H	I	J	K	L
533	35	1/24/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Modify declaration & supporting schedules re Net Losses Associated with Richard Nguyen & Mai Do prepared at the request of the SEC. Note there were 3-4000 transactions to be reviewed & considered, 30 different categories of revenues and expenses to be identified summarized & reconciled to the Receivership sources & uses activity adjusted for the recoveries received to date and balanced to the cash on hand.	2.60	\$ 1,690.00	650.00	\$ 520	\$ 1,352
534	36	1/14/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	2.30	\$ 1,495.00	650.00	\$ 520	\$ 1,196
535	37	1/25/22	Hogan, Natalie	NH	P	Investor Claim Forms	Continued review of investor net investment documents to facilitate claim form participation.	2.40	\$ 360.00	150.00	\$ 125	\$ 300
536	38	1/31/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	CCW Doug Miller re issues on draft Dec for RN & MD's disgorgements. CCWs with Kyra Andrassy & David Bell re joint & several, commingling, common access, common control, common benefit concept & how to establish; NTV judgment & why difference.	2.30	\$ 1,495.00	650.00	\$ 520	\$ 1,196
537	39	2/1/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Review of various stipulations & interrogatories to obtain testimony & establish a joint & several, commingling, common access, common control, common benefit concept and relationship between Mai Do & Richard Nguyen. Modify draft dec.	3.30	\$ 2,145.00	650.00	\$ 520	\$ 1,716
538	40	2/1/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	3.40	\$ 2,210.00	650.00	\$ 520	\$ 1,768
539	41	2/2/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Modify Exhibit I and the PJI schedules for changes in presentation, etc.	4.10	\$ 2,665.00	650.00	\$ 520	\$ 2,132
540	42	2/2/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Obtain & modify the signatories on the bank & brokerage accounts and update Excel file & schedule for the draft declaration. Forensic accounting of changes to the summary sched & related supporting schedules.	4.30	\$ 2,795.00	650.00	\$ 520	\$ 2,236
541	43	2/3/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Review edits & make modifications to dec based on Kyra's and David Bell's edits & comments. Modify the dec & supporting schedules.	3.10	\$ 2,015.00	650.00	\$ 520	\$ 1,612
542	44	2/3/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Investigated "Other" non-investor activity. Non-investor activity totaled \$1.4M. Traced amounts and attempted to further identify or add specificity to transactions that was previously unknown.	3.70	\$ 2,405.00	650.00	\$ 520	\$ 1,924
543	45	2/4/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Continued Investigating "Other" non-investor activity. Traced amounts and attempted to further identify or add specificity to transactions that was previously unknown.	5.70	\$ 3,705.00	650.00	\$ 520	\$ 2,964
544	46	2/4/22	Brandlin, Jeff	JEB	I	Fee Application	Review & finalize fee app & execute declaration - no charge.	0.30	\$ 195.00	650.00	\$ -	\$ -
545	47	2/4/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Final edits & circulation of draft to Kyra Andrassy & David Bell.	1.90	\$ 1,235.00	650.00	\$ 520	\$ 988
546	48	2/5/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	3.10	\$ 2,015.00	650.00	\$ 520	\$ 1,612
547	49	2/5/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Reconciliation of monies diverted by Richard Vu & Mai Do.	3.20	\$ 2,080.00	650.00	\$ 520	\$ 1,664
548	50	2/9/22	Brandlin, Jeff	JEB	I	Fee Application	NTV Fee Application - no charge.	0.60	\$ 390.00	650.00	\$ -	\$ -
549	51	2/9/22	Brandlin, Jeff	JEB	P	Investor Claim Forms	Review edit & execute the draft proposed Claims Review Process.	3.20	\$ 2,080.00	650.00	\$ 520	\$ 1,664
550	52	2/10/22	Brandlin, Jeff	JEB	H	Real Estate Evaluation	Cash accounting and forensic analysis on sale of assets (Real Estate).	1.60	\$ 1,040.00	650.00	\$ 520	\$ 832
551	53	2/10/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	3.20	\$ 2,080.00	650.00	\$ 520	\$ 1,664
552	54	2/11/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	3.30	\$ 2,145.00	650.00	\$ 520	\$ 1,716
553	55	2/11/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Modify declaration & supporting schedules re Net Losses Associated with Richard Nguyen & Mai Do prepared at the request of the SEC. Note there were 3-4000 transactions to be reviewed & considered, 30 different categories of revenues and expenses to be identified summarized & reconciled to the Receivership sources & uses activity adjusted for the recoveries received to date and balanced to the cash on hand.	3.60	\$ 2,340.00	650.00	\$ 520	\$ 1,872
554	56	2/12/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Reconciliation of monies diverted by Richard Vu & Mai Do.	2.10	\$ 1,365.00	650.00	\$ 520	\$ 1,092
555	57	2/14/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Finalize declaration, supporting schedules & recalculate the PJI based on change in dates and send to Doug Miller for review & approval.	2.10	\$ 1,365.00	650.00	\$ 520	\$ 1,092
556	58	2/16/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Final memo & calculations to Kyra Doug Miller & David Bell with hand edits & modified summary and supporting exhibits.	3.70	\$ 2,405.00	650.00	\$ 520	\$ 1,924

Brandlin Associates
#3135
NTV Financial Group, Inc.

Detailed Fees
10/28/21 - 8/22/23

	A	B	C	D	E	F	G	H	I	J	K	L
557	59	2/15/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	1.70	\$ 1,105.00	650.00	\$ 520	\$ 884
558	60	3/8/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Follow up on Mai Do's banking relationships with the various banks. Provide accounts, bank names and addresses so EC&J could serve the banks to see if we could attach one of her bank accounts.	1.70	\$ 1,105.00	650.00	\$ 520	\$ 884
559	61	3/10/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Prep & participation on CCW Doug Miller @ SEC re Dec re unjust enrichment for Richard Vo & Mai Do.	2.20	\$ 1,430.00	650.00	\$ 520	\$ 1,144
560	62	3/14/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Research and reconciliation of Mai D's starting point. Review prior calcs and reconcile the difference between \$704,200 & \$772,911.	3.70	\$ 2,405.00	650.00	\$ 520	\$ 1,924
561	63	3/14/22	Brandlin, Jeff	JEB	B	Court Appearance	Travel to and attend hearing with Judge Wilson.	2.50	\$ 1,625.00	650.00	\$ 520	\$ 1,300
562	64	3/15/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Updated NTV Consolidated file (Excel workbook) with details regarding investigation of "other" non-investor transactions / amounts.	4.10	\$ 2,665.00	650.00	\$ 520	\$ 2,132
563	65	3/15/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Continued updating NTV Consolidated file (Excel workbok) with additional references, formatting and linkage of new schedules. The workbook includes 30+ tabs, various formulas, and other.	4.20	\$ 2,730.00	650.00	\$ 520	\$ 2,184
564	66	3/29/22	Hogan, Natalie	NH	E	Litigation / Preferences	Review of the Richard Vu's & Mai Do's bank accounts to find their Social Security numbers to execute a search of bank accounts so we can levy against any accounts located.	1.40	\$ 210.00	150.00	\$ 125	\$ 175
565	67	4/6/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up with Doug Miller re Dec on Mai Do & Richard Vu's disgorgement reconciliation. CCW Doug re reconciliation for Mai Do. Review calcs & reply.	2.70	\$ 1,755.00	650.00	\$ 520	\$ 1,404
566	68	4/7/22	Brandlin, Jeff	JEB	A	Administrative	Modify calc of Mai Do's disgorgement for professional fees recovery. Prepare ETC for B&A, SWE, etc. & record on updated schedule & circulate to Doug Miller.	1.70	\$ 1,105.00	650.00	\$ 520	\$ 884
567	69	4/28/22	Hogan, Natalie	NH	E	Litigation / Preferences	Complete W-9 for NTV Watches of Switzerland settlement - no charge.	0.30	\$ 45.00	150.00	\$ -	\$ -
568	70	5/3/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Watches of Switzerland Settlement agreement review & execution, completion of W-9.	0.40	\$ 260.00	650.00	\$ 520	\$ 208
569	71	5/4/22	Brandlin, Jeff	JEB	A	Administrative	PCW H re current location of Richard Vu & Mai Do so they could be served. Emailed information to Byron Moldo & Sonia Singh.	0.20	\$ 130.00	650.00	\$ 520	\$ 104
570	72	7/5/22	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	Review updated Claims' Package.	0.75	\$ 487.50	650.00	\$ 520	\$ 390
571	73	7/6/22	Hogan, Natalie	NH	F	Investor Analysis / Claims	Review updated Claims' Package & research updated addresses for some of the managed account clients for Kyra.	1.60	\$ 240.00	150.00	\$ 125	\$ 200
572	74	8/5/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Coordinate with Sonia Singh and the process server to serve Mai Do the court's exam order based on input from Hung Nguyen on August 12 at the mortuary.	0.60	\$ 390.00	650.00	\$ 520	\$ 312
573	75	8/9/22	Hogan, Natalie	NH	E	Litigation / Preferences	Coordinating with Nguyen & the process server to serve Mai Do @ John Dinh's mother's funeral.	0.30	\$ 45.00	150.00	\$ 125	\$ 38
574	76	8/10/22	Hogan, Natalie	NH	E	Litigation / Preferences	Coordination of Mai Do service.	0.30	\$ 45.00	150.00	\$ 125	\$ 38
575	77	8/10/22	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	PCW investor re current location of Richard Vu & Mai Do so they could be served. Emailed information to Byron Moldo & Sonia Singh.	0.40	\$ 260.00	650.00	\$ 520	\$ 208
576	78	8/22/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Review the release for Eurolux. Execute agreement and get notarized.	0.80	\$ 520.00	650.00	\$ 520	\$ 416
577	79	9/13/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	PCW re current location of Richard Vu & Mai Do so they could be served. Emailed information to Byron Moldo & Sonia Singh.	0.20	\$ 130.00	650.00	\$ 520	\$ 104
578	80	9/13/22	Brandlin, Jeff	JEB	A	Administrative	CCW Doug Miller re status and claim against Richard Vu & Mai Do.	0.80	\$ 520.00	650.00	\$ 520	\$ 416
579	81	9/19/22	Brandlin, Jeff	JEB	E	Litigation / Preferences	Follow up with counsel re serving Richard & Mai Do.	0.50	\$ 325.00	650.00	\$ 520	\$ 260
580	82	10/24/22	Hogan, Natalie	NH	P	Investor Claim Forms	Reviewed and evaluated investor claim responses (i.e., confirmations received with exceptions).	2.20	\$ 330.00	150.00	\$ 125	\$ 275
581	83	10/24/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Reviewed reconciliation of funds diverted by Richard Nguyen & Mai Do.	2.30	\$ 1,495.00	650.00	\$ 520	\$ 1,196
582	84	11/1/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Updated NTV Consolidated file (Excel workbook) with details regarding investigation and impact of litigation recoveries.	2.60	\$ 1,690.00	650.00	\$ 520	\$ 1,352
583	85	11/2/22	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	3.10	\$ 2,015.00	650.00	\$ 520	\$ 1,612
584	86	11/3/22	Brandlin, Jeff	JEB	P	Investor Claim Forms	Preparation (1.5) & participation (.3) on CCW with Kyra, David Bell re status on Investor Claims, issues, translation of the reply letter, etc., and next steps.	1.80	\$ 1,170.00	650.00	\$ 520	\$ 936
585	87	11/3/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Updated NTV Consolidated file - Sources & Uses tab.	2.40	\$ 1,560.00	650.00	\$ 520	\$ 1,248

Brandlin Associates
#3136
NTV Financial Group, Inc.
Detailed Fees
10/28/21 - 8/22/23

	A	B	C	D	E	F	G	H	I	J	K	L
586	88	11/3/22	Bell, David	DRB	P	Investor Claim Forms	Conference call with Jeff Brandlin and Kyra Andrassy regarding Investor Claims status, issues, reply letter translation and other.	0.30	\$ 178.50	595.00	\$ 505	\$ 152
587	89	11/4/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Analyzed forensic accounting performed to date. Revised workpaper documentation, cleared open items / notes, and other.	2.90	\$ 1,885.00	650.00	\$ 520	\$ 1,508
588	90	11/7/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Continued analysis of electronic and hardcopy documentation. Compared documents to the NTV Consolidated file (Excel workbook).	2.20	\$ 1,430.00	650.00	\$ 520	\$ 1,144
589	91	11/14/22	Brandlin, Jeff	JEB	D	Forensic Accounting	Revisit file to ensure accurate findings and conclusions based on the totality of information processed to date.	1.90	\$ 1,235.00	650.00	\$ 520	\$ 988
590	92	1/9/23	Brandlin, Jeff	JEB	E	Litigation / Preferences	Follow up with ECJ and the status of the clawback litigation and service on Mai Do.	0.75	\$ 487.50	650.00	\$ 520	\$ 390
591	93	2/16/23	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	Update Clawback schedule & respond to Kelly Bower's request for info on the total collections received for NTV. Track down sources of Brokerage account proceeds. Reconcile to status report fund reports. Forward data to Kyra.	1.80	\$ 1,170.00	650.00	\$ 520	\$ 936
592	94	2/23/23	Brandlin, Jeff	JEB	E	Litigation / Preferences	Review the data file for the SEC disgorgement memo in prep for call with Doug Miller to catch up and complete this phase of the Receivership. Webex call with Doug to go over the schedules and refresh his understanding of the options and approach. Update schedule for updated Clawback results from Sonia and replace the clawback supporting schedule. F/U with Sonia re EC&J's out of pocket costs.	3.75	\$ 2,437.50	650.00	\$ 520	\$ 1,950
593	95	3/1/23	Brandlin, Jeff	JEB	D	Forensic Accounting	Responding to Doug Miller's questions about "No Bank Data", "Trading Commissions" and other sources of cash other than Investors and credit card deposits from Pho Mo Restaurant. Provided the deposits by bank by classification. See details in the 3-1-23 email to Doug.	2.70	\$ 1,755.00	650.00	\$ 520	\$ 1,404
594	96	3/17/23	Brandlin, Jeff	JEB	A	Administrative	Investigate options to limit NTV's cash balances at East West to less than \$4250K. Review CDARS & ICS options - no charge.	0.75	\$ 487.50	650.00	\$ -	\$ -
595	97	4/4/23	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	Review of the options for distributions - Rising Tide & Net Investment - and concluded on Rising Tide. Prepare worksheet for the computation and review calcs with David Bell.	2.70	\$ 1,755.00	650.00	\$ 520	\$ 1,404
596	98	4/6/23	Brandlin, Jeff	JEB	A	Administrative	Zoom call with Doug Miller to clarify the nature of the Merchant Bank transactions, cash deposits & withdrawals & PhoMo Restaurant net Receipts.	0.75	\$ 487.50	650.00	\$ 520	\$ 390
597	99	4/25/23	Brandlin, Jeff	JEB	E	Litigation / Preferences	PCW Doug Miller re payment schedule for Michele Nguyen.	0.40	\$ 260.00	650.00	\$ 520	\$ 208
598	100	4/25/23	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Prepare schedule for Doug Miller re NTV Business Expenses detail and eliminate IRS, SBE, Media Spends, etc., from totals, in support of Doug Miller's memo re Disgorgement from RN & MD.	1.90	\$ 1,235.00	650.00	\$ 520	\$ 988
599	101	4/25/23	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Prepare schedule for Doug Miller re Transfer to Bank & Transfers to Brokerage to explain for his memo to SEC as to or amounts to be disgorged by RN & MD.	2.20	\$ 1,430.00	650.00	\$ 520	\$ 1,144
600	102	4/26/23	Hogan, Natalie	NH	P	Investor Claim Forms	Reviewed and evaluated investor claim responses (i.e., confirmations received with exceptions).	2.10	\$ 315.00	150.00	\$ 125	\$ 263
601	103	4/26/23	Brandlin, Jeff	JEB	D	Forensic Accounting	Edit schedule for additions business expenses and reduce total by \$100K on schedule supporting Doug Miller's memo re NTV Business Expenses detail. Review detail repetitive payments to James & Kimiko Miller. Payments relate to Note due on sale of 17th Street property to NTV Financial.	2.20	\$ 1,430.00	650.00	\$ 520	\$ 1,144
602	104	4/27/23	Brandlin, Jeff	JEB	Q	Richard Nguyen Declaration	Follow up on and document the transactions comprising the details of RN & MD's disgorgement claim.	2.10	\$ 1,365.00	650.00	\$ 520	\$ 1,092
603	105	6/13/23	Bell, David	DRB	F	Investor Analysis / Claims	Reviewed Jeff Brandlin's Rising Tide Calculation. Discussion with Jeff Brandlin regarding analysis and methodology. Read Rising Tide literature.	1.75	\$ 1,041.25	595.00	\$ 520	\$ 910
604	106	6/20/23	Bell, David	DRB	F	Investor Analysis / Claims	Recalculated Rising Tide Calculation. Formatted workpaper and work steps.	1.50	\$ 892.50	595.00	\$ 520	\$ 780
605	107	6/21/23	Brandlin, Jeff	JEB	E	Litigation / Preferences	Follow up on the Mai Do & Michele Nguyen claims.	0.60	\$ 390.00	650.00	\$ 520	\$ 312
606	108	6/29/23	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	Review Rising Tide Calculations for the Investors' claims (4.1). Discuss results with David Bell & Kyra Andrassy (.5).	4.60	\$ 2,990.00	650.00	\$ 520	\$ 2,392
607	109	6/29/23	Bell, David	DRB	F	Investor Analysis / Claims	Presented Rising Tide calculation to Jeff Brandlin.	0.30	\$ 178.50	595.00	\$ 520	\$ 156
608	110	7/6/23	Brandlin, Jeff	JEB	A	Administrative	PCW Kyra Andrassy & David Bell regarding NTV Managed Accounts.	0.20	\$ 130.00	650.00	\$ 520	\$ 104

Brandlin Associates
#3137
NTV Financial Group, Inc.

Detailed Fees
10/28/21 - 8/22/23

	A	B	C	D	E	F	G	H	I	J	K	L	
609	111	7/6/23	Bell, David	DRB	A	Administrative	Teleconference with Jeff Brandlin and Kyra Andrassy regarding treatment of Managed Accounts.	0.20	\$ 119.00	595.00	\$ 520	\$ 104	
610	112	7/11/23	Bell, David	DRB	F	Investor Analysis / Claims	Prepared memo on Rising Tide calculation for Jeff Brandlin, Kyra Andrassy and Michael Simon. Discussed investors "in" and "out" of the money, and investors that returned claim forms after the claim date (8/15/22).	0.60	\$ 357.00	595.00	\$ 520	\$ 312	
611	113	7/11/23	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	Discussions with David Bell and counsel regarding Rising Tide Calculation.	0.60	\$ 390.00	650.00	\$ 520	\$ 312	
612	114	7/12/23	Bell, David	DRB	F	Investor Analysis / Claims	Revised Rising Tide calculation based on email discussions with Kyra Andrassy and Michael Simon.	0.50	\$ 297.50	595.00	\$ 520	\$ 260	
613	115	8/10/23	Brandlin, Jeff	JEB	A	Administrative	Zoom call with Doug Miller & Kyra Andrassy re status and next steps.	0.30	\$ 195.00	650.00	\$ 520	\$ 156	
614	116	8/10/23	Brandlin, Jeff	JEB	F	Investor Analysis / Claims	Zoom call with Kyra & Michael Simon re status and approach to motion to distribute & finalize the Receivership. Discussion of Michele Nguyen payout, etc. Contact Steve Mitnick re discounting of Michele Nguyen's settlement.	0.30	\$ 195.00	650.00	\$ 520	\$ 156	
615	117	8/14/23	Bell, David	DRB	F	Investor Analysis / Claims	Updated Rising Tide Calculation (investor no. 58) based on exchange with counsel.	0.50	\$ 297.50	595.00	\$ 520	\$ 260	
616	118	8/21/23	Bell, David	DRB	I	Fee Application	Preparation of Brandlin & Associates 2nd Fee Application. Categorized and formatted time entries. No Charge.	7.50	\$ 4,462.50	595.00	\$ -	\$ -	
617													
618								274.80	\$ 169,084.50				\$ 132,019.00

EXHIBIT "3"

Smiley Wang-Ekvall, LLP
3200 Park Center Drive, Suite 250
Costa Mesa, CA 92626
Phone: 714-445-1000

Jeffrey E. Brandlin, CPA, CFF/CIRA, CM&AA -
Receiver for NTV Financial Group et al.
12100 Wilshire Blvd., Suite 1120
Los Angeles, CA 90025

August 21, 2023
Our File: BRA02.0001
Invoice # 27669

RE: NTV Financial, Inc.

Statement of account for services rendered through August 21, 2023

Previous Balance **\$ 0.00**

Professional Services

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/04/2021	KEA	01 - Asset Analysis and Recovery Meeting with Receiver re forensic accounting/sources and uses and information required	1.00	\$ 526.50/hr	\$ 526.50
11/04/2021	KEA	01 - Asset Analysis and Recovery Review bank records re missing items and prepare document requests for subpoenas to Bank of America and Chase	0.90	\$ 526.50/hr	\$ 473.85
11/08/2021	JH	01 - Asset Analysis and Recovery Preparation of subpoenas and document requests re JPMorgan and Bank of America; notice of same	1.00	\$ 238.50/hr	\$ 238.50
11/09/2021	JH	01 - Asset Analysis and Recovery Finalize subpoenas and coordinate service	0.30	\$ 238.50/hr	\$ 71.55
11/18/2021	JH	01 - Asset Analysis and Recovery Preparation of correspondence to Bank of America re response to subpoena	0.40	\$ 238.50/hr	\$ 95.40

11/18/2021	KEA	01 - Asset Analysis and Recovery Review Bank of America letter in response to subpoena	0.10	\$ 526.50/hr	\$ 52.65
11/30/2021	KEA	01 - Asset Analysis and Recovery Exchange of correspondence with Bank of America re extension of time to respond to the subpoena	0.10	\$ 526.50/hr	\$ 52.65
11/30/2021	JH	01 - Asset Analysis and Recovery Update chart re responses to subpoenas	0.10	\$ 238.50/hr	\$ 23.85
12/06/2021	KEA	01 - Asset Analysis and Recovery Review Chase production re unknown account and prepare correspondence to D. Bell re same	0.20	\$ 526.50/hr	\$ 105.30
01/12/2022	KEA	01 - Asset Analysis and Recovery Telephone call with Bank of America re documents missing from December production	0.10	\$ 526.50/hr	\$ 52.65
01/12/2022	KEA	01 - Asset Analysis and Recovery Review BofA document production in reference to subpoena to identify documents not produced	0.40	\$ 526.50/hr	\$ 210.60
01/12/2022	KEA	01 - Asset Analysis and Recovery Second phone call with Bank of America re additional documents missing from December production	0.20	\$ 526.50/hr	\$ 105.30
01/20/2022	KEA	01 - Asset Analysis and Recovery Review Bank of America production and forward same to Receiver	0.30	\$ 526.50/hr	\$ 157.95
01/20/2022	KEA	01 - Asset Analysis and Recovery Telephone call with J. Brandlin re Bank of America production	0.20	\$ 526.50/hr	\$ 105.30
02/01/2022	KEA	01 - Asset Analysis and Recovery Review and revise most recent Brandlin declaration re disgorgement	0.40	\$ 526.50/hr	\$ 210.60
02/01/2022	KEA	01 - Asset Analysis and Recovery Review Exhibit 1 to declaration and propose additional changes to declaration	0.30	\$ 526.50/hr	\$ 157.95
02/14/2022	KEA	01 - Asset Analysis and Recovery Review correspondence from Fiserv re Bank of America subpoena and need to issue one to Wells Fargo, which processed merchant services account	0.10	\$ 526.50/hr	\$ 52.65
02/14/2022	JH	01 - Asset Analysis and Recovery	0.30	\$ 238.50/hr	\$ 71.55

		Preparation of subpoena to Wells Fargo Merchant Services			
02/22/2022	JH	01 - Asset Analysis and Recovery Coordinate service of subpoena and prepare notice of service re same	0.20	\$ 238.50/hr	\$ 47.70
10/31/2022	KEA	01 - Asset Analysis and Recovery Telephone call with J. Brandlin re clawback actions	0.20	\$ 526.50/hr	\$ 105.30
		01 - Asset Analysis and Recovery Totals	4.50	@ \$ 526.50/hr	\$ 2,369.25
			2.30	@ \$ 238.50/hr	\$ 548.55
			6.80		\$ 2,917.80
11/02/2021	KEA	04 - Case Administration Telephone call with Receiver re status report and meeting with investors	0.10	\$ 526.50/hr	\$ 52.65
11/03/2021	KEA	04 - Case Administration Revise status report re forensic accounting figures	0.30	\$ 526.50/hr	\$ 157.95
11/03/2021	KEA	04 - Case Administration Prepare correspondence to Receiver re status report for completion	0.10	\$ 526.50/hr	\$ 52.65
11/04/2021	KEA	04 - Case Administration Review revised accounting and prepare correspondence to D. Bell with questions re same	0.30	\$ 526.50/hr	\$ 157.95
11/08/2021	KEA	04 - Case Administration Revise status report for NTV based on updated accounting	0.40	\$ 526.50/hr	\$ 210.60
11/09/2021	KEA	04 - Case Administration Telephone call with Receiver re investor call	0.30	\$ 526.50/hr	\$ 157.95
11/13/2021	KEA	04 - Case Administration Prepare updated information for website re investor meeting (no charge)	0.20	\$ 0.00/hr	No Charge
11/15/2021	KEA	04 - Case Administration Review updated SFAR and exchange of correspondence with D. Bell re same	0.10	\$ 526.50/hr	\$ 52.65
11/15/2021	KEA	04 - Case Administration Revise status report to incorporate	0.30	\$ 526.50/hr	\$ 157.95

		Receiver's changes			
11/22/2021	KEA	04 - Case Administration Update spreadsheets re litigation status and prepare correspondence to D. Bell re same	0.20	\$ 526.50/hr	\$ 105.30
11/22/2021	KEA	04 - Case Administration Exchange of correspondence re updates re chart re reserved fees and estimated distribution percentage	0.20	\$ 526.50/hr	\$ 105.30
11/22/2021	KEA	04 - Case Administration Further revise fifth status report re additional changes to figures	0.30	\$ 526.50/hr	\$ 157.95
11/22/2021	KEA	04 - Case Administration Prepare letter to investors re Zoom investor meeting	0.30	\$ 526.50/hr	\$ 157.95
11/22/2021	KEA	04 - Case Administration Revise investor presentation	0.40	\$ 526.50/hr	\$ 210.60
11/22/2021	KEA	04 - Case Administration Prepare letter to investor inquiring re case status (no charge)	0.20	\$ 0.00/hr	No Charge
11/24/2021	KEA	04 - Case Administration Exchange of various correspondence with interpreter re meeting next week (no charge)	0.20	\$ 0.00/hr	No Charge
11/29/2021	KEA	04 - Case Administration Review revised investor presentation in advance of run through	0.10	\$ 526.50/hr	\$ 52.65
11/29/2021	KEA	04 - Case Administration Telephone call with interpreter	0.20	\$ 526.50/hr	\$ 105.30
11/29/2021	KEA	04 - Case Administration Meeting to prepare for investor call	1.00	\$ 526.50/hr	\$ 526.50
11/30/2021	KEA	04 - Case Administration Review email with investor questions and forward to Receiver	0.10	\$ 526.50/hr	\$ 52.65
12/02/2021	KEA	04 - Case Administration Review investor questions and forward same to Receiver (no charge)	0.10	\$ 0.00/hr	No Charge
12/02/2021	KEA	04 - Case Administration Attendance at investor meeting	1.30	\$ 526.50/hr	\$ 684.45
12/02/2021	KEA	04 - Case Administration Run through of investor presentation	0.50	\$ 0.00/hr	No Charge
12/06/2021	KEA	04 - Case Administration	0.10	\$ 0.00/hr	No Charge

		Exchange of correspondence with investors re link to recorded meeting			
12/07/2021	KEA	04 - Case Administration Prepare claim motion and status report for SEC review before filing (no charge)	0.40	\$ 0.00/hr	No Charge
12/07/2021	KEA	04 - Case Administration Exchange of correspondence with investor who could not attend meeting re link to recorded meeting (no charge)	0.10	\$ 0.00/hr	No Charge
01/03/2022	KEA	04 - Case Administration Exchange of correspondence with investor re Zoom presentation link (no charge)	0.10	\$ 0.00/hr	No Charge
01/11/2022	KEA	04 - Case Administration Zoom meeting with Receiver re declaration re judgments against Nguyen and Do	0.50	\$ 526.50/hr	\$ 263.25
01/26/2022	KEA	04 - Case Administration Finalize fifth status report for filing and prepare service and filing instructions re same	0.20	\$ 526.50/hr	\$ 105.30
02/11/2022	KEA	04 - Case Administration Prepare correspondence to Andrew Logan re pleadings filed today for posting on website (no charge)	0.10	\$ 0.00/hr	No Charge
02/23/2022	KEA	04 - Case Administration Telephone call with investor re claim process (no charge)	0.10	\$ 0.00/hr	No Charge
03/08/2022	KEA	04 - Case Administration Prepare declaration of service on investors of status report and fee application notices	0.20	\$ 526.50/hr	\$ 105.30
03/14/2022	KEA	04 - Case Administration Telephone call with Doug Miller re overall case status and hearings today	0.20	\$ 526.50/hr	\$ 105.30
06/30/2022	KEA	04 - Case Administration Telephone call with investor re case status (no charge)	0.10	\$ 0.00/hr	No Charge
08/24/2022	KEA	04 - Case Administration Exchange of correspondence with investor re communication from NTV Capital (no charge)	0.10	\$ 0.00/hr	No Charge
08/24/2022	KEA	04 - Case Administration Telephone call with investor re late	0.10	\$ 526.50/hr	\$ 52.65

		claim and re claim for managed account			
08/24/2022	KEA	04 - Case Administration Exchange of correspondence with J. Brandlin re investor who moved	0.10	\$ 0.00/hr	No Charge
08/25/2022	KEA	04 - Case Administration Telephone call with investor re missing claim form	0.10	\$ 0.00/hr	No Charge
09/20/2022	KEA	04 - Case Administration Exchange of correspondence with investor re case status	0.10	\$ 0.00/hr	No Charge
09/26/2022	KEA	04 - Case Administration Exchange of correspondence with investor re confirmation of receipt of claim and re estimated distribution	0.10	\$ 0.00/hr	No Charge
09/28/2022	KEA	04 - Case Administration Telephone call with investor re tax issue on managed account	0.20	\$ 526.50/hr	\$ 105.30
10/12/2022	KEA	04 - Case Administration Review email from investor with statement and forward to Receiver's office (no charge)	0.10	\$ 0.00/hr	No Charge
10/17/2022	KEA	04 - Case Administration Exchange of correspondence with investor re claim and distribution process (no charge)	0.10	\$ 0.00/hr	No Charge
10/19/2022	KEA	04 - Case Administration Further exchange of correspondence with counsel for investor re anticipated distribution (no charge)	0.10	\$ 0.00/hr	No Charge
11/09/2022	KEA	04 - Case Administration Exchange of correspondence with investor re claims and distribution status (no charge)	0.10	\$ 0.00/hr	No Charge
11/15/2022	KEA	04 - Case Administration Review and revise Brandlin declaration re bank and brokerage accounts for SEC filing re R. Nguyen	0.50	\$ 526.50/hr	\$ 263.25
12/09/2022	KEA	04 - Case Administration Exchange of correspondence with investor re case status (no charge)	0.10	\$ 0.00/hr	No Charge
12/14/2022	KEA	04 - Case Administration Exchange of correspondence with investor re estimated distribution timing (no charge)	0.10	\$ 0.00/hr	No Charge

12/27/2022	KEA	04 - Case Administration Exchange of correspondence with investor re estimated timing of distributions	0.10	\$ 0.00/hr	No Charge
01/09/2023	KEA	04 - Case Administration Exchange of correspondence with D. Bell re issues to resolve before making final distribution	0.10	\$ 526.50/hr	\$ 52.65
01/09/2023	KEA	04 - Case Administration Meeting with Receiver re estimated timing of distributions and loose ends to tie up	0.30	\$ 526.50/hr	\$ 157.95
01/25/2023	KEA	04 - Case Administration Telephone call with investor re estimated timeframe for distributions	0.10	\$ 0.00/hr	No Charge
01/25/2023	MLS	04 - Case Administration Review correspondence from K. Bui re case status	0.10	\$ 0.00/hr	No Charge
01/26/2023	MLS	04 - Case Administration Prepare correspondence to T. Bui re case status	0.10	\$ 0.00/hr	No Charge
01/26/2023	KEA	04 - Case Administration Exchange of correspondence with Receiver's office re pending litigation and effect on timing of distributions	0.10	\$ 526.50/hr	\$ 52.65
01/27/2023	KEA	04 - Case Administration Exchange of correspondence with investor forwarding same prewritten email from defendant (no charge)	0.10	\$ 0.00/hr	No Charge
03/09/2023	KEA	04 - Case Administration Exchange of correspondence with investor re case status	0.10	\$ 0.00/hr	No Charge
03/10/2023	TWE	04 - Case Administration Confer with investor M. W. regarding status of case (no charge)	0.30	\$ 0.00/hr	No Charge
03/15/2023	KEA	04 - Case Administration Exchange of correspondence with counsel for investors re status of case	0.10	\$ 526.50/hr	\$ 52.65
04/19/2023	KEA	04 - Case Administration Meeting with investor re case status	0.20	\$ 526.50/hr	\$ 105.30
04/25/2023	KEA	04 - Case Administration Telephone call with D. Miller re info needed for disgorgement judgment	0.10	\$ 526.50/hr	\$ 52.65

04/25/2023	KEA	04 - Case Administration Telephone call with Doug Miller re status of resolution of SEC action	0.10	\$ 526.50/hr	\$ 52.65
05/01/2023	KEA	04 - Case Administration Telephone call with D. Miller re initial distribution motion and re Richard Nguyen issue	0.20	\$ 526.50/hr	\$ 105.30
06/06/2023	KEA	04 - Case Administration Telephone call with Kelly Bowers re distribution motion and anticipated timing of same (no charge)	0.10	\$ 0.00/hr	No Charge
06/14/2023	KEA	04 - Case Administration Telephone call with Receiver re rising tide analysis and status of distribution motion	0.30	\$ 526.50/hr	\$ 157.95
06/15/2023	KEA	04 - Case Administration Meeting to review distribution calculations	0.50	\$ 526.50/hr	\$ 263.25
06/16/2023	KEA	04 - Case Administration Prepare language to update receivership website	0.20	\$ 526.50/hr	\$ 105.30
08/09/2023	KEA	04 - Case Administration Review translated emails from R. Nguyen to investors and forward to SEC	0.20	\$ 526.50/hr	\$ 105.30
08/10/2023	KEA	04 - Case Administration Review status of disbursement motion and what remains to complete	0.30	\$ 526.50/hr	\$ 157.95
08/10/2023	KEA	04 - Case Administration Meeting with Receiver re distribution motion and amount to be distributed	0.30	\$ 526.50/hr	\$ 157.95
08/10/2023	KEA	04 - Case Administration Meeting with Doug Miller to discuss final Brandlin declaration and status of distribution motion	0.30	\$ 526.50/hr	\$ 157.95
04 - Case Administration Totals			11.20	@ \$ 526.50/hr	\$ 5,896.80
			4.30	@ \$ 0.00/hr	\$ 0.00
			15.50		\$ 5,896.80
11/22/2021	KEA	05 - Claims Administration/Objections Prepare creditor letter re claim form	0.30	\$ 526.50/hr	\$ 157.95
11/22/2021	KEA	05 - Claims Administration/Objections	0.50	\$ 526.50/hr	\$ 263.25

		Finalize memorandum of points and authorities re claim procedure motion and exhibits to same			
11/29/2021	KEA	05 - Claims Administration/Objections Further revise claim procedure motion re additional detail	0.30	\$ 526.50/hr	\$ 157.95
12/05/2021	KEA	05 - Claims Administration/Objections Revise claim motion to incorporate J. Brandlin's comments and recirculate same for approval	0.20	\$ 526.50/hr	\$ 105.30
01/13/2022	KEA	05 - Claims Administration/Objections Finalize memorandum of points and authorities to incorporate SEC's comments and finalize for filing	0.30	\$ 526.50/hr	\$ 157.95
02/08/2022	KEA	05 - Claims Administration/Objections Finalize claim procedure motion/declaration/memorandum	0.30	\$ 526.50/hr	\$ 157.95
03/14/2022	KEA	05 - Claims Administration/Objections Prepare for claim procedures hearing today	0.50	\$ 526.50/hr	\$ 263.25
03/14/2022	KEA	05 - Claims Administration/Objections Attendance at hearing re fee application and claim procedures	2.00	\$ 526.50/hr	\$ 1,053.00
03/14/2022	KEA	05 - Claims Administration/Objections Travel to and prepare for hearing re fee application and claim procedures (no charge)	2.40	\$ 0.00/hr	No Charge
04/19/2022	KEA	05 - Claims Administration/Objections Prepare correspondence to J. Brandlin re notice of claims bar date	0.10	\$ 526.50/hr	\$ 52.65
05/09/2022	KEA	05 - Claims Administration/Objections Attention to issues re investor mailing list for claims notice	0.20	\$ 526.50/hr	\$ 105.30
05/11/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with Receiver's office re mechanics of claims preparation	0.30	\$ 526.50/hr	\$ 157.95

05/16/2022	KEA	05 - Claims Administration/Objections Telephone call with Receiver's office re merge with investor info and claim forms	0.20	\$ 526.50/hr	\$ 105.30
06/01/2022	KEA	05 - Claims Administration/Objections Review draft claim form and forward comments and changes to Receiver's office	0.40	\$ 526.50/hr	\$ 210.60
06/13/2022	KEA	05 - Claims Administration/Objections Finalize letter to investors and coordinate with Receiver's office re claim packages	0.20	\$ 526.50/hr	\$ 105.30
06/13/2022	KEA	05 - Claims Administration/Objections Prepare notice of claims bar date	0.20	\$ 526.50/hr	\$ 105.30
06/13/2022	KEA	05 - Claims Administration/Objections Prepare creditor listing with relevant taxing authorities	0.70	\$ 526.50/hr	\$ 368.55
06/14/2022	JH	05 - Claims Administration/Objections Preparation of correspondence re publication of notice in The OC Register	0.10	\$ 238.50/hr	\$ 23.85
06/14/2022	JH	05 - Claims Administration/Objections Correspondence to OC Register re proof of notice	0.20	\$ 238.50/hr	\$ 47.70
06/14/2022	KEA	05 - Claims Administration/Objections Review elements of claims package to prepare service instructions	0.30	\$ 526.50/hr	\$ 157.95
06/15/2022	JH	05 - Claims Administration/Objections Telephone conference with Hong at nguoi-viet.com	0.10	\$ 238.50/hr	\$ 23.85
06/15/2022	JH	05 - Claims Administration/Objections Email correspondence to Kim Hong at nguoi-viet.com	0.10	\$ 238.50/hr	\$ 23.85
06/15/2022	KEA	05 - Claims Administration/Objections Finalize claim information for investors	0.20	\$ 526.50/hr	\$ 105.30

06/15/2022	KEA	05 - Claims Administration/Objections Telephone call with Receiver's office re claim forms	0.10	\$ 526.50/hr	\$ 52.65
06/17/2022	KEA	05 - Claims Administration/Objections Review revised claims and prepare correspondence to Natalie re same	0.10	\$ 526.50/hr	\$ 52.65
06/20/2022	KEA	05 - Claims Administration/Objections Review file re managed account information	0.50	\$ 526.50/hr	\$ 263.25
06/21/2022	KEA	05 - Claims Administration/Objections Prepare language for website re claim process and deadline to submit claims	0.20	\$ 526.50/hr	\$ 105.30
06/23/2022	KEA	05 - Claims Administration/Objections Review claims returned today and coordinate with Jeff's office re best way to log same	0.20	\$ 526.50/hr	\$ 105.30
06/27/2022	KEA	05 - Claims Administration/Objections Prepare packages with letters re amended claim forms to 20 investors (no charge)	1.80	\$ 0.00/hr	No Charge
07/01/2022	KEA	05 - Claims Administration/Objections Telephone call with Natalie re procedure re disputed claims (no charge)	0.10	\$ 0.00/hr	No Charge
07/01/2022	KEA	05 - Claims Administration/Objections Prepare claim package for investor who moved	0.10	\$ 526.50/hr	\$ 52.65
07/05/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor K. Nguyen re claim package and address for claim (no charge)	0.10	\$ 0.00/hr	No Charge
07/05/2022	KEA	05 - Claims Administration/Objections Analysis of managed account list to ensure all potentially affected investors served	1.20	\$ 526.50/hr	\$ 631.80
07/06/2022	KEA	05 - Claims	0.20	\$ 526.50/hr	\$ 105.30

		Administration/Objections Prepare correspondence to Receiver re managed accounts issue re claims			
07/06/2022	KEA	05 - Claims Administration/Objections Telephone call with J. Brandlin and D. Bell re managed account list	0.20	\$ 526.50/hr	\$ 105.30
07/06/2022	KEA	05 - Claims Administration/Objections Prepare managed account service list (no charge)	0.90	\$ 0.00/hr	No Charge
07/06/2022	KEA	05 - Claims Administration/Objections Revise forms and letters re managed account holders	0.80	\$ 526.50/hr	\$ 421.20
07/07/2022	KEA	05 - Claims Administration/Objections Prepare correspondence to IT professional re search on imaged computers for four investor/creditor addresses	0.10	\$ 526.50/hr	\$ 52.65
07/19/2022	KEA	05 - Claims Administration/Objections Telephone call with investor K. Bui re claim procedure	0.10	\$ 0.00/hr	No Charge
07/25/2022	KEA	05 - Claims Administration/Objections Review proof of publication in Vietnamese publication (no charge)	0.10	\$ 0.00/hr	No Charge
07/29/2022	KEA	05 - Claims Administration/Objections Prepare draft of email to send in English and Vietnamese to investors to remind them of the claims bar date	0.20	\$ 526.50/hr	\$ 105.30
08/01/2022	KEA	05 - Claims Administration/Objections Prepare email to investors re upcoming claim deadline	0.10	\$ 526.50/hr	\$ 52.65
08/01/2022	KEA	05 - Claims Administration/Objections Prepare letter to investors as reminder re claims bar date	0.10	\$ 526.50/hr	\$ 52.65
08/01/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with	0.10	\$ 0.00/hr	No Charge

		investor Q. Duong re claim forms and instructions			
08/01/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor confirming receipt of claim (no charge)	0.10	\$ 0.00/hr	No Charge
08/02/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor re claim form questions	0.20	\$ 0.00/hr	No Charge
08/02/2022	KEA	05 - Claims Administration/Objections Telephone call with investor re confirmation of receipt of claim and re estimated timing of distribution (no charge)	0.10	\$ 0.00/hr	No Charge
08/04/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor who did not receive claim forms and forward her forms to complete (no charge)	0.10	\$ 0.00/hr	No Charge
08/08/2022	KEA	05 - Claims Administration/Objections Phone and email communications with investors re claims bar date (no charge)	0.30	\$ 0.00/hr	No Charge
08/09/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investors confirming receipt of claims (no charge)	0.10	\$ 0.00/hr	No Charge
08/10/2022	KEA	05 - Claims Administration/Objections Telephone call with investor re claim form and questions re accounting on same	0.50	\$ 0.00/hr	No Charge
08/10/2022	KEA	05 - Claims Administration/Objections Review bank records to respond to question from investor	0.30	\$ 526.50/hr	\$ 157.95
08/11/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor confirming receipt of claim form (no charge)	0.10	\$ 0.00/hr	No Charge
08/11/2022	KEA	05 - Claims	0.20	\$ 526.50/hr	\$ 105.30

		Administration/Objections Telephone call with investor re payments received and backup for same			
08/15/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor confirming receipt of claim	0.10	\$ 0.00/hr	No Charge
08/15/2022	KEA	05 - Claims Administration/Objections Telephone call with investor confirming receipt of claim (no charge)	0.10	\$ 0.00/hr	No Charge
08/22/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with investor re returned mail/claim form	0.10	\$ 0.00/hr	No Charge
08/26/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with D. Bell re claim review process and treatment of late-filed claims	0.10	\$ 526.50/hr	\$ 52.65
08/31/2022	KEA	05 - Claims Administration/Objections Telephone call with investor M. Tran re claim form	0.10	\$ 526.50/hr	\$ 52.65
08/31/2022	KEA	05 - Claims Administration/Objections Review claim form sent 8/25 by M. Tran and forward to Natalie Hogan	0.10	\$ 526.50/hr	\$ 52.65
09/06/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with two investors re claims process and confirmation of receipt	0.10	\$ 0.00/hr	No Charge
09/13/2022	KEA	05 - Claims Administration/Objections Strategize with Receiver's office re next steps in the claim process	0.10	\$ 526.50/hr	\$ 52.65
09/19/2022	KEA	05 - Claims Administration/Objections Review claims chart for forms returned and exchange of correspondence with N. Hogan and J. Brandlin re next steps	0.10	\$ 526.50/hr	\$ 52.65
10/07/2022	KEA	05 - Claims Administration/Objections	0.20	\$ 526.50/hr	\$ 105.30

		Review spreadsheet of returned and disputed claims			
10/11/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with N. Hogan re claims not filed	0.10	\$ 526.50/hr	\$ 52.65
10/24/2022	KEA	05 - Claims Administration/Objections Telephone call with J. Brandlin re resolution on disputed claim	0.10	\$ 526.50/hr	\$ 52.65
11/01/2022	KEA	05 - Claims Administration/Objections Exchange of correspondence with Natalie Hogan re four claim disputes; review draft email to investors	0.10	\$ 526.50/hr	\$ 52.65
11/03/2022	KEA	05 - Claims Administration/Objections Telephone call with Receiver and team re claim disputes and re distribution timing	0.30	\$ 526.50/hr	\$ 157.95
01/27/2023	KEA	05 - Claims Administration/Objections Analysis of whether it would be cost effective to object to the two remaining claims	0.20	\$ 526.50/hr	\$ 105.30
01/27/2023	KEA	05 - Claims Administration/Objections Prepare recommendation to Receiver re allowing the two disputed claims because the differences in amounts do not justify the cost of objecting	0.10	\$ 526.50/hr	\$ 52.65
01/31/2023	MLS	05 - Claims Administration/Objections Review correspondence from L. Cao re claim status	0.10	\$ 306.00/hr	\$ 30.60
03/10/2023	MLS	05 - Claims Administration/Objections Telephone conference with M. Watling re status of disbursements	0.10	\$ 306.00/hr	\$ 30.60
03/31/2023	KEA	05 - Claims Administration/Objections Prepare correspondence to Receiver re info needed on claims matrix to evaluate whether to use rising tide or net investment methods	0.10	\$ 526.50/hr	\$ 52.65

04/03/2023	KEA	05 - Claims Administration/Objections Review chart of percentage distributions to analyze most equitable distribution method	0.20	\$ 526.50/hr	\$ 105.30
04/03/2023	KEA	05 - Claims Administration/Objections Prepare correspondence to Receiver re recommendation to use rising tide distribution method	0.20	\$ 526.50/hr	\$ 105.30
04/04/2023	MLS	05 - Claims Administration/Objections Review and analysis of information re returned claims	0.10	\$ 306.00/hr	\$ 30.60
04/04/2023	KEA	05 - Claims Administration/Objections Exchange of correspondence with J. Brandlin re rising tide method and winning investors	0.10	\$ 526.50/hr	\$ 52.65
04/04/2023	MLS	05 - Claims Administration/Objections Review and analysis of amounts invested and received by investors for distribution motion	0.70	\$ 306.00/hr	\$ 214.20
04/04/2023	MLS	05 - Claims Administration/Objections Prepare motion for interim distribution	3.60	\$ 306.00/hr	\$ 1,101.60
06/14/2023	MLS	05 - Claims Administration/Objections Review and analysis of rising tide claims distributions	1.20	\$ 306.00/hr	\$ 367.20
06/15/2023	MLS	05 - Claims Administration/Objections Prepare motion to authorize interim distributions	0.90	\$ 306.00/hr	\$ 275.40
06/15/2023	MLS	05 - Claims Administration/Objections Review and analysis of Receiver's rising tide calculations for interim distribution motion	0.20	\$ 306.00/hr	\$ 61.20
06/15/2023	MLS	05 - Claims Administration/Objections Zoom meeting with J. Brandlin, D. Bell and K. Andrassy re interim distribution calculations and motion, and next steps	0.60	\$ 306.00/hr	\$ 183.60

06/15/2023	MLS	05 - Claims Administration/Objections Prepare correspondence to J. Brandlin and D. Bell re disputed claims and insider claims	0.20	\$ 306.00/hr	\$ 61.20
06/21/2023	MLS	05 - Claims Administration/Objections Review correspondence from D. Bell re rising tide calculations and analysis thereon	0.30	\$ 306.00/hr	\$ 91.80
06/22/2023	MLS	05 - Claims Administration/Objections Analysis of issues for rising tide calculations and prepare correspondence to D. Bell thereon	0.30	\$ 306.00/hr	\$ 91.80
06/27/2023	MLS	05 - Claims Administration/Objections Review correspondence from D. Bell re rising tide calculations and interim fee app, and prepare response	0.10	\$ 306.00/hr	\$ 30.60
06/29/2023	KEA	05 - Claims Administration/Objections Review two claims from investors with managed accounts to verify no objection	0.10	\$ 526.50/hr	\$ 52.65
06/29/2023	MLS	05 - Claims Administration/Objections Zoom meeting with D. Bell and J. Brandlin re rising tide calculations	0.60	\$ 306.00/hr	\$ 183.60
06/29/2023	KEA	05 - Claims Administration/Objections Meeting to review rising tide calculations	0.50	\$ 526.50/hr	\$ 263.25
07/13/2023	MLS	05 - Claims Administration/Objections Review correspondence from D. Bell re late-filed claims, analysis thereon, and prepare response	0.20	\$ 306.00/hr	\$ 61.20
08/07/2023	KEA	05 - Claims Administration/Objections Exchange of correspondence with D. Bell re allowing late-filed claim	0.10	\$ 526.50/hr	\$ 52.65
08/07/2023	MLS	05 - Claims Administration/Objections Review correspondence from D. Bell re M. Tran's claim form	0.10	\$ 306.00/hr	\$ 30.60
08/10/2023	MLS	05 - Claims	0.10	\$ 306.00/hr	\$ 30.60

		Administration/Objections Prepare correspondence to D. Bell and J. Brandlin re claims distribution motion and fee applications			
08/10/2023	MLS	05 - Claims Administration/Objections Zoom meeting with Receiver, D. Bell and K. Andrassy re claims distribution motion	0.30	\$ 306.00/hr	\$ 91.80
08/14/2023	MLS	05 - Claims Administration/Objections Prepare correspondence to D. Bell re updated rising tide analysis	0.10	\$ 306.00/hr	\$ 30.60
08/14/2023	MLS	05 - Claims Administration/Objections Prepare memorandum of points and authorities in support of motion to make first and final distribution to investors using rising tide methodology	1.40	\$ 306.00/hr	\$ 428.40
08/15/2023	MLS	05 - Claims Administration/Objections Review correspondence from D. Bell re rising tide calculations and prepare response re clawback summary analysis	0.10	\$ 306.00/hr	\$ 30.60
08/15/2023	MLS	05 - Claims Administration/Objections Telephone conference with D. Bell re rising tide calculations	0.10	\$ 306.00/hr	\$ 30.60
08/15/2023	MLS	05 - Claims Administration/Objections Prepare motion for order authorizing receiver to make first and final distribution to investors	4.30	\$ 306.00/hr	\$ 1,315.80
08/16/2023	MLS	05 - Claims Administration/Objections Prepare motion for authority to make first and final distribution, and related relief	4.40	\$ 306.00/hr	\$ 1,346.40
08/17/2023	KEA	05 - Claims Administration/Objections Prepare letter to accompany motion to approve distribution	0.50	\$ 526.50/hr	\$ 263.25
08/17/2023	KEA	05 - Claims Administration/Objections Revise claim distribution motion	1.60	\$ 526.50/hr	\$ 842.40

08/17/2023	MLS	05 - Claims Administration/Objections Prepare declaration of J. Brandlin in support of motion for order authorizing first and final distribution to investors, and for related relief	2.10	\$ 306.00/hr	\$ 642.60
08/17/2023	MLS	05 - Claims Administration/Objections Revise motion for order authorizing the receiver to distribute the funds on hand using the rising tide methodology	0.50	\$ 306.00/hr	\$ 153.00
08/17/2023	MLS	05 - Claims Administration/Objections Prepare correspondence to J. Brandlin and D. Bell re distribution motion and related issues	0.10	\$ 306.00/hr	\$ 30.60
		05 - Claims	16.80	@ \$ 526.50/hr	\$ 8,845.20
		Administration/Objections Totals			
			7.50	@ \$ 0.00/hr	\$ 0.00
			0.50	@ \$ 238.50/hr	\$ 119.25
			22.80	@ \$ 306.00/hr	\$ 6,976.80
			47.60		\$ 15,941.25
11/10/2021	KEA	10 - Litigation Exchange of correspondence with D. Miller re Brandlin declaration re Nguyen motion	0.10	\$ 526.50/hr	\$ 52.65
12/03/2021	KEA	10 - Litigation Revise Brandlin declaration re amount that benefitted Richard Nguyen	1.10	\$ 526.50/hr	\$ 579.15
12/28/2021	KEA	10 - Litigation Review correspondence from D. Miller re Brandlin declaration and interest calculation	0.10	\$ 526.50/hr	\$ 52.65
01/06/2022	KEA	10 - Litigation Review revised Brandlin declaration re SEC claims against defendants and prepare correspondence to him re same	0.30	\$ 526.50/hr	\$ 157.95
01/07/2022	KEA	10 - Litigation Review sources and uses for Brandlin declaration re damages	0.30	\$ 526.50/hr	\$ 157.95
01/12/2022	KEA	10 - Litigation	0.40	\$ 526.50/hr	\$ 210.60

		Telephone call with D. Miller re disgorgement judgment amounts based on forensic accounting			
01/12/2022	KEA	10 - Litigation Telephone call with J. Brandlin re declaration re disgorgement	0.10	\$ 526.50/hr	\$ 52.65
01/20/2022	KEA	10 - Litigation Telephone call with J. Brandlin re docs produced by Bank of America and	0.20	\$ 526.50/hr	\$ 105.30
01/28/2022	KEA	10 - Litigation Telephone call with J. Brandlin re declaration and exhibits thereto	0.10	\$ 526.50/hr	\$ 52.65
01/28/2022	KEA	10 - Litigation Review and revise Brandlin declaration	0.60	\$ 526.50/hr	\$ 315.90
01/31/2022	KEA	10 - Litigation Telephone call with J. Brandlin re forensic accounting	0.80	\$ 526.50/hr	\$ 421.20
01/31/2022	KEA	10 - Litigation Review bank records produced to verify signatories on accounts for forensic accounting and determining roles of Do and Nguyen	0.40	\$ 526.50/hr	\$ 210.60
02/01/2022	KEA	10 - Litigation Telephone call with Receiver re Nguyen/Do disgorgement judgments and evidence of respective roles within NTV and review files to locate same	0.50	\$ 526.50/hr	\$ 263.25
		10 - Litigation Totals	5.00	@ \$ 526.50/hr	\$ 2,632.50
			5.00		\$ 2,632.50
11/02/2021	KEA	13 - Fee Applications Subcategorize time related to real properties to verify reasonableness (no charge)	1.20	\$ 0.00/hr	No Charge
12/28/2021	KEA	13 - Fee Applications Prepare Receiver's fee application (no charge)	2.30	\$ 0.00/hr	No Charge
01/03/2022	KEA	13 - Fee Applications Finalize draft of interim fee application for SWE (no charge)	1.80	\$ 0.00/hr	No Charge
01/13/2022	KEA	13 - Fee Applications Telephone call with D. Miller re fee	0.30	\$ 0.00/hr	No Charge

		apps			
02/04/2022	KEA	13 - Fee Applications Combine fee applications into one and revise factual background (no charge)	1.70	\$ 0.00/hr	No Charge
02/08/2022	KEA	13 - Fee Applications Complete compilation of the separate fee apps into one and revise narrative (no charge)	1.90	\$ 0.00/hr	No Charge
02/09/2022	KEA	13 - Fee Applications Prepare notice of hearing and Andrassy declaration re first interim joint fee app (no charge)	0.50	\$ 0.00/hr	No Charge
03/15/2022	KEA	13 - Fee Applications Prepare fee order (no charge)	0.20	\$ 0.00/hr	No Charge
		13 - Fee Applications Totals	9.90	@ \$ 0.00/hr	\$ 0.00
			9.90		\$ 0.00
Total Professional Services			84.80		\$ 27,388.35

Costs And Disbursements

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/22/2022	Service of Process- Service of Subpoena- Wells Fargo Merchant Services	\$ 189.39
	Attorney Service Totals	\$ 189.39
11/22/2021	Copies: Correspondence to Bank of America	\$ 3.20
11/22/2021	Copies: Correspondence to Khanh Nguyen in Response to Letter Received on 11/15/21	\$ 0.40
11/24/2021	Copies: Letter to NTV Investors	\$ 40.40
01/26/2022	Copies: Fifth Status Report of the Receiver	\$ 407.80
02/04/2022	Copies: First Interim Fee Apps of SWE and Receiver; Notice of Hearing on Fee Apps	\$ 60.80
02/11/2022	Copies: Notice of Motion and Motion re: Claims Procedures; First Interim Fee Application of SWE and Receiver; Notice of Hearings on Fee Application of SWE and Receiver	\$ 427.20
02/22/2022	Copies: Service of Notice of Subpoena	\$ 6.00
03/08/2022	Copies: Declaration of KEA re: Service on Investors of Status Report and Notice of Hearings	\$ 1.40
06/15/2022	Copies: Investor Claim Forms	\$ 320.00
06/15/2022	Copies: Creditor Claim Forms	\$ 14.00
06/28/2022	Copies: Revised Claim Forms	\$ 78.00

07/01/2022	Copies: Revised Claim Forms - Thuyen Ly & Trish Nguyen	\$ 3.60
07/07/2022	Copies: Additional Claim Forms and Instructions	\$ 44.80
08/01/2022	Copies: Letter Reminder to Investors to Submit Claims	\$ 40.00
	Copies Totals	\$ 1,447.60
11/22/2021	Postage: Correspondence to Bank of America via USPS Priority	\$ 8.70
11/22/2021	Postage: Correspondence to Khanh Nguyen in Response to Letter Received on 11/15/21	\$ 0.53
11/24/2021	Postage: Letter to NTV Investors	\$ 53.53
01/26/2022	Postage: Fifth Status Report of the Receiver	\$ 75.69
02/04/2022	Postage: First Interim Fee Apps of SWE and Receiver; Notice of Hearing on Fee Apps	\$ 32.10
02/11/2022	Postage: Notice of Motion and Motion re: Claims Procedures; First Interim Fee Application of SWE and Receiver; Notice of Hearings on Fee Application of SWE and Receiver	\$ 92.80
02/22/2022	Postage: Service of Notice of Subpoena	\$ 1.59
03/08/2022	Postage: Declaration of KEA re: Service on Investors of Status Report and Notice of Hearings	\$ 0.73
06/15/2022	Postage: Investor Claim Forms	\$ 73.00
06/15/2022	Postage: Creditor Claim Forms	\$ 7.42
06/28/2022	Postage: Revised Claim Forms	\$ 27.90
07/01/2022	Postage: Revised Claim Forms - Thuyen Ly & Trish Nguyen	\$ 1.06
07/07/2022	Postage: Additional Claim Forms and Instructions	\$ 10.22
08/01/2022	Postage: Letter Reminder to Investors to Submit Claims	\$ 57.00
	Mailing/Postage Totals	\$ 442.27
11/23/2021	Day Translations Invoice 103331	\$ 30.95
11/23/2021	Day Translation Invoice 103334	\$ 120.00
12/09/2021	Bank of America legal order processing	\$ 29.00
02/08/2022	Day Translations: Notice of hearing on Claims Procedure Motion translation English-Vietnamese	\$ 173.74
02/09/2022	Day Translations: Notice of hearing on Fee Apps translation English-Vietnamese	\$ 90.80
06/02/2022	Day Translations: Claim form	\$ 265.73
06/07/2022	Day Translations: Letter to investors to accompany claim	\$ 87.56
06/14/2022	Publication Fee: Southern CA News Group- Ad request	\$ 1,248.00
06/14/2022	Translation of notice of deadline to file claims	\$ 50.79
06/21/2022	Publishing Fees: Empire Printing Publishing	\$ 200.00
07/29/2022	Translation of investor email re claims deadline	\$ 18.30
11/21/2022	Day Translations: translation of an investor letter	\$ 20.18

Miscellaneous Totals		\$ 2,335.05
11/22/2021	Pacer Online Research	\$ 3.90
03/14/2022	Pacer Online Research	\$ 2.80
08/18/2022	Pacer Online Research	\$ 4.80
03/09/2023	Pacer Online Research	\$ 1.90
Pacer Fee Totals		\$ 13.40
03/14/2022	Uber for Kyra and Sharon to NTV hearing re claims procedure and fee application	\$ 13.96
Travel/Lodging Totals		\$ 13.96
12/01/2022	West Law Online Research (Strategic Acquisitions)	\$ 267.36
12/02/2022	West Law Online Research (Strategic Acquisitions)	\$ 389.58
West Law Totals		\$ 656.94
Total Costs and Disbursements		\$ 5,098.61
Total Current Charges		\$ 32,486.96
Summary Of Account		
Balance Forward		\$ 0.00
Total Current Charges		\$ 32,486.96
Less Payments And Credits		
	3/30/2022 Payment	(\$10,000.00)
	3/30/2022 Payment - Check	(\$170,386.10)
Balance Due		(\$ 147,899.14)

Notes:

Wire Transfer Instructions:
City National Bank
555 South Flower Street
Los Angeles, CA 90071
Routing Number: 122016066
Account Number: 023904985

Trust Account Summary

Billing Period: 11/01/2021 - 08/21/2023

Client: Brandlin, Jeffrey E. - Receiver for NTV Financial Group et al. | General Matter Trust

Total Deposits		Total Disbursements	Current Balance	
\$0.00		\$0.00	\$0.00	
Date	Transaction	Deposit	Disbursement	Balance
No activity for this billing period.				

User Hours Summary

Billing Period: 11/01/2021 - 08/21/2023

User Hour Totals

User Initials	User	Hours Billed	Rate/Hour	Amount Billed
KEA	Kyra E Andrassy	37.50	\$ 526.50	\$ 19,743.75
KEA	Kyra E Andrassy	21.20	\$ 0.00	\$ 0.00
JH	Janet Hogan	2.80	\$ 238.50	\$ 667.80
MLS	Michael L Simon	0.20	\$ 0.00	\$ 0.00
MLS	Michael L Simon	22.80	\$ 306.00	\$ 6,976.80
TWE	Timothy W Evanston	0.30	\$ 0.00	\$ 0.00
Totals		84.80		\$ 27,388.35

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626.

On 9/1/2023, I served true copies of the following document(s) described as
SECOND AND FINAL APPLICATION FOR ALLOWANCE AND PAYMENT OF FEES OF: (1) JEFFREY BRANDLIN & ASSOCIATES; AND (2) SMILEY WANG-EKVALL, LLP on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

(X) (BY COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")). Pursuant to United States District Court, Central District of California, Local Civil Rule 5-3, the foregoing document will be served by the court via NEF and hyperlinked to the document. On 9/1/2023, I checked the CM/ECF docket for this case and determined that the aforementioned person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated.

(X) (BY U.S. MAIL). I enclosed the document(s) in a sealed envelope or package and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Smiley Wang-Ekvall, LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Costa Mesa, California.

() (BY E-MAIL). By scanning the document(s) and then e-mailing the resultant pdf to the e-mail address indicated above per agreement. Attached to this declaration is a copy of the e-mail transmission.

() (BY FACSIMILE). I caused the above-referenced documents to be transmitted to the noted addressee(s) at the fax number as stated. Attached to this declaration is a "TX Confirmation Report" confirming the status of transmission. Executed on _____, at Costa Mesa, California.

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

(X) FEDERAL I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 1, 2023 at Costa Mesa, California.

/s/ James Chung

James Chung

BY COURT VIA NOTICE OF ELECTRONIC FILING ("NEF"):

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