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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, vs. **AlliedWallet, Inc., et al.**, Defendants.	No. 2:19-CV-4355 PLAINTIFF'S RECOMMENDATION FOR LIQUIDATING RECEIVER

In connection with the Joint Application for Entry of Stipulated Final Order for Permanent Injunction and Monetary Judgment Against Ahmad ("Andy") Khawaja, Alliedwallet, Inc., Allied Wallet, Ltd., GTBill, LLC, and GTBill Ltd., filed concurrently, Plaintiff Federal Trade Commission ("FTC") makes the following recommendation regarding the appointment of a liquidating receiver, as contemplated in the proposed Stipulated Final Order for Permanent Injunction and Monetary Judgment Against Ahmad ("Andy") Khawaja, Alliedwallet, Inc., Allied Wallet, Ltd., GTBill, LLC, and GTBill Ltd. (hereinafter, "Stipulated Final Order").

The FTC proposes that the Court appoint Stephen J. Donell, of FedReceiver, Inc., as liquidating receiver, as contemplated in the Stipulated Final Order.

Mr. Donell is qualified to serve as liquidating receiver and has expressed a willingness to do so. A copy of his qualifications is attached as Attachment A hereto. As reflected in Attachment A, Mr. Donell has extensive experience with receiverships and real property transactions. Mr. Donell's proposed fee schedule is attached hereto as Attachment B. The fee schedule for his proposed counsel is attached hereto as Attachment C. The fee schedule for the accountants he would retain, in the event such work became necessary, is attached hereto as Attachment D.

We are unaware of any conflicts of interests that would prevent Mr. Donell from acting as liquidating receiver in this matter.

Should the Court desire to consider additional options for liquidating receiver, the FTC can provide names of additional highly qualified candidates.

Respectfully submitted,

ALDEN ABBOTT
General Counsel

Dated: May 20, 2019



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PROOF OF SERVICE

Per Local Rules 5-3.2.1 and 5-3.1.2, I, Andrew Hudson, hereby declare that on May 20, 2019, I served the foregoing Plaintiff's Recommendation for Liquidating Receiver, and its attachments, on all parties in the manner specified below:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on May 20, 2019 in Washington, DC.

Andrew Hudson