Tripp Scott, P.A.
110 Southeast 6th Street
15th Floor
Fort Lauderdale, FL 33301
Telephone (954)-525-7500 * Fax (954) 761-8475
Tax ID 59-2624630

Federal Trade Commission

Date: May 31, 2026
Invoice No. 1-B
Account No. 221495.0001
Page: 1

RE: Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partner

Exhibit A

Interim Statement

Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partners & multiple entities

					Hours
04/15/2026	NDS	L120	A108	Conference with Elizbeth Scott w/FTC, firm litigation team (CAT/DAR/CDC/POL) regarding case/receivership	0.40
	CDC	L120	A104	Review of TRO, Receivership Order, and corresponding pleadings.	1.50
	CDC	L120	A108	Call with FTC and initial conference with legal team.	1.10
	CMT	L120	A104	Review of the temporary restraining order, the exhibits and all of the allegations contained in the complaint under seal in order to prepare to administer the receivership estate.	1.60
	CMT	L120	A109	Participation in the initial conference and meeting with the FTC attorneys and investigator in order to begin the receivership estate administration.	1.10
	SJD	L100	A107	Communicate (other outside counsel): Call with FTC forensics team and initial conference with legal team.	1.10
	SJD	L100	A104	Review/analyze: Order appointing receiver.	0.50
	SJD	L100	A104	Review/analyze: issues pertaining to forensic imaging, availability of physical drive vs cloud storage and doing general research on likely CRM systems.	0.60
04/16/2026	NDS	L100	A102	Assisted counsel with research regarding Coral Spring locksmiths, contacted several for coordination of services to secure property, confirmed order	0.40
	NDS	L210	A102	Assisted counsel with researching Southern District requirements for receiver bonds, retrieved local forms and summarized procedures	0.30
	CDC	L210	A104	Review voluminous documents/filings including all pertinent declarations.	2.40
	NDS	B200	A108	Call with locksmith for rescheduling	0.10
	CMT	L120	A103	Preparation of notices to the parties being served with the freeze order and preparation of other notices of the receivership proceeding. Review of additional pleadings that need to be prepared.	0.70

Federal Trade Commission
May 31, 2026
Account No: 221495-0001
Statement No: 1

Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partners & multiple entities

					Hours
	CMT	L120	A103	Participation and continual meeting and telephone communications with the two attorneys and the investigator for the FTC and meeting throughout the day and into the evening with respect to arranging for the raid on the defendants' facility, arranging for the simultaneous service of the freeze order and other communications in connection with the beginning of the administration of the estate.	8.10
	LXS	L110	A104	Analysis of pending items prior to taking possession of business premises in Coral Springs, coordination with local law enforcement resources, and analysis of operative court order with FTC personnel	1.50
	SJD	L100	A107	Communicate (other outside counsel): Meeting in staging area conference room with FTC to go through plan for transition, imaging of devices, and triaging potential ESI sources.	3.80
04/17/2026	NDS	B200	A101	Assisted counsel with preparing materials for incursion	0.20
	CMT	L120	A109	Participation in ongoing meetings with the two attorneys and the investigator for the FTC to coordinate the raid on the facility, to deal with issues with respect to service of the freeze order and multiple other receivership estate administrative issues. No time billed for "down time" in the meeting as an accommodation.	6.90
04/18/2026	CMT	L120	A105	Worked to coordinate the receiver's team's participation in the raid in order to secure assets and intellectual property.	0.40
	CMT	L120	A109	Travel twice to the business location on University Dr. in Coral Springs to determine what assets were being removed. Participation in multiple communications with local police authorities and the US Marshal representative as to possible removal of assets.	2.80
04/20/2026	CDC	L110	A109	Attend raid of premises and inveestigate/review pertinent documents	10.30
	NDS	B210	A109	Appear for/attend raid of defendant's business, assisted with various task including but not limited locating pertinent business information, employee information, securing building, etc.	8.00
	NDS	B210	A109	Return to defendant's business for counsel assistance and monitoring of FTC investigation	2.40
	CMT	L120	A109	Participation in meeting with the receiver's team to prepare for the US Marshal service raid. Meeting with the US marshals and working with the team to prepare for the raid. Following the raid, work with the FTC team of lawyers, the investigator and the IT forensic team to gather information, communicate with counsel for the defendants, to communicate with the CTA for the defendants, and gather information for the receivers. Work to have the removed computers returned. Work on multiple communications in order to gather assets of the estate.	10.40
	LXS	L110	A109	Attendance at subject business premises to secure documents, assets, and other business property with federal and local law enforcement plus travel to and from	4.00
	DAR	B110	A109	Prepare for, travel to/from and execute premises seizure and	

					Hours
				inspection.	10.20
04/21/2026	DAR	B120	A105	Preserve document, email comm/ w/ CMT/PL re same.	0.20
	DAR	B120	A105	Team meeting w/ receiver.	0.50
	CMT	L120	A109	Participation in meetings at the business location of the defendants with the Federal Trade Commission attorneys and investigator in order to complete the examination of documents and gathering of information. Work with the Federal Trade Commission IT professionals to help gather all of the computer and cloud information. Communication with the attorneys for the defendants in order to gather all of the IT information that is needed.	3.40
	CMT	L120	A108	Participation in multiple communications with the local and general counsel for the defendants in order to gain the information needed to evaluate the defendants' business operations. Work in communications to obtain the return of the remaining computers. Work on communications to gain access to the employee information and to gain access to the customer information.	1.70
	DAR	B120	A108	T/c communications with Paychex re account access and control.	0.90
	CMT	L120	A105	Participation in team meeting in order to assign tasks to the team members in order for the Receiver to be able to fully analyze on a prompt basis the business operations in order to make a determination if the business operation should continue.	0.70
	CMT	L120	A104	Review of the financial information provided by the accountant for the defendants in order to determine the profitability an ongoing viability of the defendants.	0.60
	DAR	B120	A108	T/c to FTC investigator re bank account documents.	0.10
	CDC	L110	A106	Internal strategy conference with legal team and receiver.	0.70
	DAL	L120	A105	Strategy meeting with POL, CMT, SJD, CDC, DAR	0.70
	DAL	L120	A104	Review of TRO & Receivership Duties (DE 13)	0.20
	JDP	L100	A109	Appear for/attend meeting regarding Receivership, task delegation	0.70
	DAL	C200	A102	Research & Preparation of memorandum re HIPAA Compliance, Receivership responsibilities	2.10
04/22/2026	DAR	B110	A108	T/c w/ FTC attorney re unsealed order status.	0.20
	NDS	B210	A104	Receipt/review of employee list for American Collective LP, communications re data	0.20
	DAR	B120	A105	Meeting w/ receiver & CMT re claims process and classification.	0.30
	JDP	L100	A110	Manage data/files Compile employee list spreadsheet	0.20
	DAR	B120	A108	Telephone call w/ Mitch Glass, accountant.	0.70
	DAR	B120	A102	Internet research on CJ Pagnanelli.	0.50
	CDC	L110	A108	Communications with prior counsel for Innovative and retrieval of pertinent inventory.	1.10
	CDC	L110	A105	Communications regarding industry and strategy.	1.20
	CMT	L120	A104	Review of information from Mitchell Glass, CPA, dealing with books and records of the company as well as access to electronically stored information. Review of multiple emails	

					Hours
				from contractors and vendors from the entities in receivership and preparation of responses.	2.70
	DAR	B110	A107	Status conference w/ receiver & FTC personnel.	0.70
	CMT	L120	A104	Review of the expert report as part of the complaint in order to support the receiver's determination to cease business operations.	0.90
	CMT	L120	A108	Participation in virtual conference with the Federal Trade Commission team in order to review facts and figures in connection with the determination as to whether the business operation should be closed.	0.60
	CMT	L120	A103	Communication with representative of the car Center in order to draft the response to be given by the car Center to those calling booking for information. Additional work in drafting language for the receiver's website.	1.10
	DAL	C200	A102	Research & Preparation of memorandum re HIPAA Compliance, Receivership responsibilities	3.50
	CDC	L120	A104	Review, analyze, and summarize lease agreement.	0.70
	DAR	B120	A108	T/c & email comm w/ M. Glass re case administration and available documents/access.	0.70
04/23/2026	DAR	B110	A108	T/c(s) w/ M. Glass, J. Hayes re W-4 forms and accounting practices.	0.50
	JDP	L190	A109	Appear for/attend Attend meeting with Salesforce regarding obtaining CRM data	0.40
	CMT	L120	A108	Participation in virtual conference with Salesforce in order to obtain customer information	0.20
	CMT	L120	A104	Continuous work in attempting to locate assets, locate financial information, complete analysis of whether the business should be continued by the receiver. Communications with auctioneer with respect to a sale of furniture and equipment. Communications with the video installer for the security cameras. Work on language to be used for the website in the event of a termination of the business by the receiver. Review of issues involving the hedge fund or hedge funds that are providing funding to the company's.	4.70
	CMT	L120	A108	Participation in virtual conference with the attorney for Equitable on the response to the TRO.	0.20
	CMT	L120	A108	Participation in virtual conference with Josh Spoont, the local legal counsel for innovative, on operational issues and assistance with strategy for dealing with operations on a short-term basis.	0.80
	CDC	L110	A105	Correspondence with Receiver.	1.20
	DAL	C200	A102	Legal Research & Memorandum re HIPAA Regulations and Compliance	5.30
	CDC	L110	A105	Call with receiver and innovative's prior counsel.	0.90
	AJD	B100	A102	Investigated and prepared EIN information for C. Tatelbaum.	2.50
	DAR	B110	A107	Follow up email to A. Gollwitzer re missing mobile phones and other outstanding issues.	0.50
04/24/2026	CMT	L120	A104	Continuous work in legal and factual analysis in connection with the decision to be made by the receiver with respect to the continuation of or part of the business operations. Review of	

					Hours
				secured transactions to determine if the assets are subject to security interests and liens. Review of issues with to the authority of the receiver to reject the Coral Springs facility lease. Communications with subcontract debtors with respect to their ongoing operations for the benefit of the companies that are subject to the receivership order.	3.20
	CDC	L110	A108	Call with Glenn McLellan.	0.70
	CDC	L110	A108	Call with CJ.	0.60
	DAR	B120	A108	Teleconference w/ FTC representatives re status and discovery.	1.10
	NDS	B210	A104	Receipt/review of QuickBook invites (x3) for the American Collective LP / Health Plan Administrators LLC / Innovative Partners LP accounts	0.20
	NDS	B210	A108	Communications with Mitchell Glass re Quickbooks accounts	0.20
	CMT	L120	A108	Multiple communications with service providers in order to deal with the issue of the continuity of service pending a determination by the receiver as to moving forward.	0.60
	CDC	L110	A108	Call with FTC.	1.10
	CDC	L110	A108	Call with FirstHealth.	0.30
	NDS	L100	A104	Reviewed, preserved numerous case filings and pertinent documents relating to TRO and subject entities	0.40
	DAL	C200	A102	Research: HIPAA Compliance Requirements, Preparation of Memorandum on same	1.50
	CDC	L110	A103	Internal communications with Receiver and co-counsel, including preparing summary of calls with Glenn McLellan and CJ Pagnanelli.	4.10
	DAL	C200	A102	Research: Receiver's obligations as to existing lease	1.80
	CDC	L110	A104	Conduct research into similar case dockets.	1.30
	CDC	L110	A108	Calls with Josh Spoont.	0.90
	DAR	B110	A102	Research secured transaction registry to determine priority and validity of creditor filing, email findings and recommendations to receiver.	1.00
	JHW	L120	A105	Strategy discussions with counsel re: next steps in analyzing profitability of receivership entities.	0.60
	JHW	L120	A110	Searched FL secured transaction registry for all Defendants' names.	0.20
	AJD	B240	A102	Contacted private parties in order to obtain documents from the IRS confirming the EINs from certain entities; contacted the IRS re. same; prepared correspondence to C. Tatelbaum and D. Ray re. same.	2.80
	JHW	L120	A108	Meeting with FTC re: next steps in freezing Defendants' accounts and attending injunction hearing.	1.10
04/25/2026	CMT	L120	A103	Preparation of notice to be placed on the website and sent to customers in accordance with FTC guidelines as to what action they can take as a result of the litigation.	0.90
	CMT	L120	A104	Review and filing of several hundred email communications in order to make sure that all communications have been responded to and appropriately categorized and filed. No time charge for administrative work as an accommodation.	
04/27/2026	CMT	K505	A109	Travel to the business facilities to conduct a meeting with Paul	

					Hours
				Fisher of Fisher auctions in order to assess the benefits of scheduling an auction sale at the premises for all of the office furniture, computer equipment and other office machinery that is there. At the same time, review of paper documents that need to be preserved and stored.	2.20
	CMT	L120	A104	Review of the financial statements and other financial records for the defendants provided by Texas counsel.	0.70
	JDP	L100	A110	Manage data/files Gather and review member lists for American Collective / Innovative Partners	0.20
	DAL	C200	A102	Finalization and submission of HIPAA memorandum to POL, CMT	1.70
	CMT	L120	A104	View of all of the information from the data obtained to date in order to determine how best to notify customers and by what means. Review of additional information concerning the use of call center's to provide information to customers.	0.90
	CMT	K504	A104	Review of legal and practical issues involving the demand to all of the banks for the turnover of funds and how to make sure they are properly allocated to the appropriate defendant entity once received.	0.30
	CDC	L110	A108	Communications with Nathan Hightower.	0.30
	CDC	L110	A104	Review balance sheet.	0.30
	CDC	L110	A108	Call with Josh Spoont.	0.20
	CDC	L110	A105	Internal discussions with co-counsel for Receiver.	0.50
	DAR	B110	A103	Draft correspondence to secured creditors identified in FL secured transaction registry, coordinate service of same.	0.90
	JHW	L120	A103	Drafted email update for victims with fillable form; emails with counsel re: same.	0.50
	JHW	L120	A103	Reviewed Receivership Order to review banks' obligations to deliver funds; drafted letter to banks directing funds to be transferred to Receiver.	1.70
	JHW	L120	A108	Calls with Vista Bank re: setting up treasury services for receivership accounts.	0.20
	NSP	L110	A104	(Innovative Partner/Shokry): review file; meeting with Chuck Tatelbaum	0.90
04/28/2026	DAR	B120	A108	Attend teleconference w/ team and FTC representatives.	0.50
	CMT	L120	A108	Participation in virtual conference with the FTC team in order to review the notice to customers, strategy with respect to ongoing benefits and preparation for the preliminary injunction hearing.	0.80
	CMT	L120	A108	Possible communications with new counsel for the defendants in order to review documents and information that has not been supplied but has been requested.	0.40
	CMT	L120	A103	Work in revising the notice to customers for the website and email blast in view of the suggestions from the FTC.	0.30
	CMT	K505	A108	Communications with an additional auctioneer in order to plan strategy for the sale of the furniture and office equipment.	0.20
	DAR	B120	A108	Research Omar Kasani, confer w/ AD, t/c w/ Kasani.	0.80
	CMT	K504	A104	Review of financial information from the QuickBooks accounts and otherwise in order to identify other assets that may be recoverable by the Receiver. Communications to counsel for the defendants in order to obtain information concerning the	

					Hours
				identity of assets.	1.20
	CDC	L110	A108	Call with FTC.	0.70
	CDC	L110	A104	Correspondence with Receiver and co-counsel for Receiver.	0.80
	CDC	L110	A108	Communications with Josh Spoont and coordination of PayChex.	0.70
	CMT	K504	A104	Review of the defendants' financial records that were provided by counsel in order to determine if there are any additional assets to be immediately recovered by the Receiver. Work on multiple communications to counsel for the defendants in order to learn the identity of the depositories of the two money market accounts.	0.80
	JHW	B110	A110	Set up Vista Bank login for bank accounts.	0.20
	JHW	L120	A103	Final revisions to bank letter template demanding sworn information and transfer of funds.	0.20
	JHW	L120	A108	Attended strategy meeting with FTC's counsel.	0.70
	JHW	L120	A108	Drafted email to Court re: potential cancellation of preliminary injunction hearing.	0.40
	JHW	L120	A103	Reviewed/revised draft website update regarding notice to consumers of health insurance.	0.40
	AJD	B240	A102	Drafted correspondence to Omar Kasani and looked into who else we could contact to obtain documentation from the IRS re. EINs.	1.90
04/29/2026	CMT	L440	A103	Review of all pleadings in conjunction with the TRO hearing scheduled for April 29. Preparation of a detailed list of documents and information that the defendants have not provided to the Receiver.	0.80
	CMT	L120	A103	Review of multiple communications from the former CPA which deals with the financial records and bank account records in order to determine the correct accounting for funds in the various money market accounts to BankUnited. Detailed review of QuickBooks entries for justification.	1.20
	CMT	K505	A108	Multiple communications with Stempler auctions in order to arrange for a sale of the furniture, office equipment and other assets located at the Coral Springs facility.	0.20
	JDP	B110	A109	Appear for/attend Receivership office breach, assessment, and security of site location.	8.90
	CDC	L110	A104	Review FTC's response to the motion for continuance.	0.20
	CDC	L110	A104	Review of agreements and correspondence with call centers.	0.80
	CMT	L400	A109	Call with the Federal Trade Commission attorneys in order to prepare for the hearing on luminary injunction and participating at the hearing with the court.	2.60
	CMT	L400	A109	Participation in the meeting with the Federal Trade Commission attorneys following the court hearing in order to prepare for the following contempt hearing.	0.40
	CMT	L120	A108	Detailed communication with representatives of the venture capital group that provided funding to the business operations.	0.20
	CDC	L110	A104	Internal communications with Receiver and Receiver's counsel regarding bank accounts, etc.	0.60
	CDC	L110	A108	Correspondence with First Health (including supplemental review and analysis of terms of Receivership Agreement) regarding termination letters.	1.40

					Hours
	JHW	L120	A103	Finalized multiple bank letters re: payment of funds to Receiver.	0.60
	AJD	B240	A102	Contacted O. Kasani and searched for correspondence from the IRS indicating the correct EIN for Health Plan Administrators, LLC.	1.50
	CDC	L450	A109	Travel to and attend hearing on motion for preliminary injunction.	1.50
04/30/2026	DAR	B110	A108	Teleconference w/ potential CPA for receivership retention.	0.60
	CMT	L120	A108	Participation in virtual conference with prospective accounting firm in order to review all of the issues for the engagement of accounting professionals to monitor the Receiver's operations and provide an engagement proposal.	0.60
	CMT	L120	A108	Extended telephone communication with the attorney for the private equity fund the claims to be a secured creditor that advance funds for the commissions.	0.30
	CMT	L120	A103	Work on revisions to the notice to customers in accordance with the meeting held with the FTC attorneys.	0.20
	JDP	L100	A109	Appear for/attend Meet with auction company for office inspection, and oversee moving of sensitive documents to Tripp Scott office	2.70
	CMT	L120	A103	Work on the final draft of the notice to customers that will be posted on the receiver's website and sent by an email blast. Review of accompanying documents to the notice. Review of the list of recipients of the email blast notice.	1.20
	CMT	K504	A103	Multiple communications with former counsel for the defendants in order to obtain additional information concerning the computers that were removed from the premises.	0.90
	DAR	B120	A103	Draft template motion for contempt of TRO.	3.30
	CMT	L450	A109	Preparation for the contempt hearing in order to be able to provide evidence to the court if needed. Attendance at contempt hearing at the Court.	2.20
	CMT	L220	A103	Work on adding all of the details in the Motion to compel and motion for contempt for failure to deliver documents and information. Finalizing the draft of the motion.	0.80
	AJD	B240	A111	Contacted O. Kasani and searched for correspondence from the IRS indicating the correct EIN for Health Plan Administrators, LLC.	0.60
	CDC	L110	A109	Attend hearing (including travel) on sua sponte motion for sanctions.	2.00
	CDC	L110	A104	Communications with Receiver and Receiver's counsel.	1.10
	NSP	L110	A102	Legal research (1.6) and preparation of memorandum of law regarding: the power of a federal court to compel a party to comply with a temporary restraining order, and to issue a contempt Order (1.5)	3.10
05/01/2026	JDP	L140	A103	Draft/revise Create database and input data for all outstanding demands needed and requested for Receivers from involved parties.	0.20
	CMT	L120	A108	Multiple communications with the attorney for the private equity lender with respect to the inappropriate financing statement filings.	0.30

					Hours
	CMT	L220	A103	Work in reviewing memorandum of law and other factual materials in order to finalize the motion to compel and for contempt for the failure to provide information and documents.	0.70
	CMT	L120	A103	Work on communications with the Coral Springs office landlord concerning the continued use of the space and dealing with the rent obligation.	0.20
	CMT	L120	A103	Work in dealing with the issue of the termination of the benefits agreement by First Health/Aetna and working to have it restored.	0.60
	DAR	B120	A107	Video conference w/ counsels for TRO defendants.	0.40
	CMT	L210	A108	Participation in virtual conference with the attorneys for the defendants as a meet and confer in order to obtain the information that will be documented in the Motion to compel.	0.40
	DAR	B110	A108	T/c w/ AD & former CPA re missing documents.	0.20
	NDS	B210	A104	Receipt/review of Innovative and American Collective members list (x4), preserved the same	0.30
	JDP	L100	A110	Manage data/files Create claim spreadsheet and input data from claim form	4.30
	CDC	L110	A108	Call with defense counsel.	0.40
	CDC	L110	A104	Correspondence with defense counsel.	0.40
	CDC	L110	A104	Review capybara agreements and communications re same.	0.30
	CDC	L110	A103	Communications with First Health.	0.40
	CDC	L110	A108	Call with Glenn McLellan.	0.40
	CDC	L110	A108	Call with Josh Spoont.	0.60
	CDC	L110	A105	Communications with Receiver and Receiver's counsel.	1.40
	AJD	B240	A102	Drafted correspondence to M Glass and and J. Hayes and attended call with J. Hayes; searched google drive folder provided to the firm by J. Hayes. (+.5)	3.60
	DAR	L250	A103	Draft/revise template motion to compel production in compliance w/ relevant court orders.	3.80
	JHW	L120	A105	Emails with counsel re: demands made to banks for sworn account information and wired funds.	0.20
	JHW	L120	A105	Strategy discussions with counsel re: responses to victim inquiries about cancellation of policies; website updates.	0.80
	JHW	L120	A103	Reviewed/revised Motion to Compel/Contempt against Receivership Entities for violation of TRO.	1.00
	NSP	L110	A102	Additional research; edit/finalize memorandum of law regarding: the power of a federal court to compel a party to comply with a temporary restraining order, and to issue a contempt Order.	1.60
05/02/2026	CDC	L110	A103	Communications with Josh Spoont re outstanding items, receivership status, g-suite accounts, etc.	1.10
05/03/2026	CMT	L300	A104	Review of the interrogatories propounded by the FTC to the defendants in order to determine what information will be beneficial to the Receiver in the administration of the estate. Review of the deposition notices served by the FTC in order to determine what question should be raised on behalf of the Receiver for the benefit of the estate.	0.60
	CMT	L120	A103	Review of issues raised by new counsel for the defendants concerning the Receiver's operation of the business of the	

					Hours
				defendants. Draft detailed response as to the Receiver's position concerning the business operation based upon the lack of any credible information from management.	0.30
05/04/2026	JDP	L100	A110	Manage data/files Send e-mail communication to all identified employees of Innovative Partners/American Collective	0.30
	CDC	L110	A104	Review of communications with defendant's counsel and receiver's counsel.	0.50
	CDC	L110	A108	Call with Nathan Hightower	0.20
	CDC	L120	A105	Conference with receiver and co-counsel.	0.60
	DAR	L100	A105	Attend status conference w/ receiver & CMT procedures.	0.30
	CMT	L300	A104	Extensive review and analysis of all of the documents and information claimed to be provided to the receiver by the defendants in order to substantiate the Motion to compel. Review of communications with counsel for the defendants on the failure to fully comply with the TRO. Review of recently provided financial information on the part of Ahmed. Preparation for hearing on the motion to compel.	4.70
	DAR	L100	A105	Communicate (in firm) w/ AD re document production from CPA/bookkeepers.	0.10
	JDP	B100	A101	Plan and prepare for meeting with previous employees answering emails/documenting contact information regarding retrieving personal items left in office.	0.60
	CDC	L110	A103	Communications with Glenn McLellan.	1.30
	CDC	L110	A104	Review financials.	1.20
	CDC	L110	A104	Review agent agency admin important info spreadsheet and correspond re same.	2.50
	AJD	C200	A111	Searched for EINs.	0.70
	JHW	L120	A105	Litigation strategy meeting re: next steps in obtaining funds from banks and missing information from Defendants.	0.30
	JHW	L120	A105	Emails with counsel re: obtaining frozen assets from banks.	
05/05/2026	NDS	B210	A108	Receipt/review communications re receivership service for TRO; Communicate (other external) w/ABC Legal for verification	0.20
	CMT	L120	A104	Continuous work in reviewing the information provided by counsel for the defendants in order to consider withdrawing the motion to compel. More detailed review of bank information provided and other financial statement information provided in order to see if there has been compliance with the receivership order. Communications with bank representatives who are responding to the receivership order with respect to transferring funds and supplying documents.	2.40
	NDS	B210	A105	Communicate (in firm) w/attorneys regarding required entity records, for facilitating bank accounts	0.30
	CMT	L120	A108	Participation in virtual conference with the FTC team on obtaining email in another document account information for the defendants.	0.20
	CMT	L120	A104	Review of pending litigation pending in other courts were Innovative is the plaintiff in order to determine how best to proceed and whether former counsel should be engaged.	0.30
	CMT	L120	A108	Communications with three vendors of the receivership entities	

					Hours
				in order to determine the extent of ongoing agreements that need to be administered in the receivership estate.	0.40
	CMT	K505	A104	Identifying vehicles that may be assets of the estate. Review of issues with respect to storage and possible auction sale of vehicles that are part of the receivership estate.	0.40
	CDC	L110	A104	Review communications with defense counsel.	0.30
	CDC	L110	A104	Review innovative receiver email account and provide responses to pertinent questions relating to billing practices.	0.90
	CDC	L110	A104	Review of filings, including motion to unfreeze funds to pay attorney's fees and preliminary injunction.	0.70
	CDC	B110	A104	Communications with receiver and co-counsel regarding status of case, including re banks and outstanding invoices.	0.50
	CDC	L110	A104	Review engagement letter and case dockets of pending cases.	0.90
	JDP	L140	A103	Draft/revise Prepare mailing list for physical mailers to potential claimants	6.40
	DAR	B130	A108	Communicate w/ Vista Bank representative(s) re opening of new receivership accounts and transfer facilitation.	0.60
	JHW	L120	A105	Emails with counsel re: documents received from banks in response to Receiver's demand letters.	0.30
	JHW	B120	A108	Emails/call with Vista Bank and internally re: additional documents needed to create bank accounts for HPA and Papyrus Green.	0.40
	JHW	B210	A105	Emails/discussions with Office Services and staff re: mailing Receivership documents to victims who did not receive emails.	0.50
	AJD	B240	A102	Drafted email correspondence to D. Ray re. missing information, attended meeting with FTC.	1.70
	NSP	L120	A102	Conference with Chuck Tatelbaum (0.2); legal research (1.4)	1.60
05/06/2026	CMT	L210	A104	Review of the pleadings of the plaintiff and the defendant in connection with the preliminary injunction and the request for fees in order to prepare for the hearing.	0.30
	NDS	L210	A104	Receipt/review/preserved service records for the TRO served on 28 entities; communications re the same	0.20
	JDP	L140	A103	Draft/revise Prepare mailing list for physical mailers to potential claimants	1.20
	CMT	B310	A104	Review of multiple communications from claims processors and other vendors to the entities prior to the appointment of the Receiver in order to determine the extent that any hole claims that need to be paid immediately to continue service.	0.90
	CMT	K505	A108	Double communications with the attorney for the defendants on making arrangements to have the surrender of the BMW vehicle to the Receiver while being able to secure the vehicle at the same time.	0.40
	CMT	K505	A103	Work on additions and revisions to the motion for authority to sell assets at public auction. Review of issues as to what to do with respect to the two creditors that claim a potential security interest in some of the assets.	0.40
	NDS	B210	A105	Discussion (in firm) with attorney re: productions received, key information, strategy for identification of add'l entities/party involvement	0.20
	CMT	K505	A104	Participation in multiple communications in order to arrange for the delivery of the BMW vehicle to the receiver for sale. Review	

					Hours
				of current insurance on the vehicle to make sure it is fully insured. Work in coordinating with the auctioneer for the secure storage of the vehicle.	0.60
	CMT	L120	A104	Review of legal research on whether the invocation of the Fifth Amendment can stop or preclude discovery in the civil action. Review of research on whether a corporation can invoke the Fifth Amendment privilege. Review of strategy to force the corporate defendants and to responding to asset location and asset existence discovery.	0.40
	CDC	L110	A104	Communications with Angela Mirabella.	0.20
	CDC	L450	A109	attend status conference hearing.	0.70
	CMT	L450	A109	Participation in status conference/hearing with the Court on attorneys' fees for the defendants and the sale of assets.	0.70
	CMT	L120	A108	Participation in virtual conference with the FTC attorney team in order to discuss the use of special counsel and discussion of pursuing downline affiliated or captive entities.	0.60
	CDC	L110	A104	Communications with defendants' counsel.	0.40
	CDC	L110	A103	Communications with Premier Administrative Solutions.	0.50
	CDC	L110	A104	Internal communications with co-counsel.	0.30
	CDC	L120	A108	Conference with FTC.	0.70
	DAR	B130	A103	Draft/revise motion to sell receivership property at auction.	3.60
	JHW	B120	A105	Emails with counsel re: requesting banks to wire funds to Receiver accounts.	0.30
	JHW	B120	A105	Emails with counsel re: recovery of corporate vehicles/insurance.	0.30
	JHW	L120	A103	Reviewed/revised Receiver's draft Motion to Authorize the sale of personal property at auction.	0.30
	JHW	B120	A108	Call with Esquire Bank re: wire of Innovative and American Collective funds to Receiver.	0.20
	NSP	L110	A102	Continued legal research and preparation of Memorandum of Law re assertion of 5th Amendment rights in civil case.	3.50
05/07/2026	CMT	K505	A104	Final work in coordinating the surrender of the BMW for the auction.	0.20
	CMT	L120	A108	Multiple communications dealing with issues raised by former employees seeking to retrieve their personal property from the office facility.	0.40
	CMT	K525	A104	Work in determining the extent of any potential tax obligation for employee withholdings. Work to have W-2 and 1099 form sent to the terminated employees and subcontractors. Work to have the federal tax 940 and 941 returns filed for 2026.	0.60
	NDS	B210	A104	Reviewed/analyzed numerous correspondence and invoices related to business operation invoices/expenses, segregated invoices, prepared comprehensive record/report for tracking and processing; correspondence re the same	2.40
	NDS	B210	A104	Reviewed/analyzed correspondence received from Mr. Glass, created record of monthly vendor expenses for Innovative Partners and American Collective, to assist counsels to determine required business servcies	0.70
	CMT	L120	A104	Detailed review of the two separate engagement letters from the outside accounting firm to represent the receivership estate. Draft communication to the FTC seeking approval for	

					Hours
				the engagement of counsel for the Receiver.	0.40
	CMT	K504	A104	Responding to multiple communications in connection with the surrender of personal property located at the office facilities in Coral Springs, and the determination with respect to personal ownership.	0.70
	NDS	B210	A108	Communication (other external) with Steven Wernikoff regarding entity financials 2	0.20
	DAR	B130	A108	T/c w/ mover, coordinate pickup of estate assets (computers).	0.20
	JDP	L100	A109	Appear for/attend Coordinate employee personal item retrieval at Coral Springs site.	2.90
	JDP	L100	A109	Research obtaining title for vehicle turned over to Receivership - Visit Tag office	3.30
	CDC	L110	A103	Various communications with vendors, including CIX Health and Premier Administrative Services and Paychex.	1.20
	CDC	L110	A104	Review filings, including Stipulated Preliminary Injunction and Order Granting Motion to Sell Property.	0.40
	CDC	L110	A104	Internal communications with receiver and co-counsel.	0.60
	CDC	L110	A104	Review additional financials and related docs.	0.90
	CDC	L110	A103	Correspondence with FTC.	0.20
	NDS	B210	A108	Receipt/review of messages from Bank of America regarding production, facilitation of account creation	0.30
	NDS	B210	A108	Receipt/review of multiple messages from Fidelity regarding account access/business records, facilitation of account creation	0.40
	NDS	B210	A108	Receipt/review of messages from Esquire Bank regarding demand response, reviewed statement for compliance; reported deficient record production to attorney	0.40
	DAR	B130	A108	T/c w/ auctioneer re asset disposition & sale procedures.	0.30
	JHW	L120	A105	Reviewed paralegal's spreadsheet of outstanding invoices to be paid; emails with counsel re: same.	0.20
05/08/2026	DAR	B120	A108	Confer w/ CMT re auction and fixture removal, email comm w/ auctioneer.	0.20
	NDS	L320	A108	Receipt/review of emails providing Notice/information re Nuvei Technologies Inc. productions; reviewed contents/preserved records received	0.60
	NDS	L320	A108	Communication exchange with John Atchley w/Davis Polk re Nuvei Technologies Inc. production	0.20
	CMT	L210	A103	Review of proposed engagement letters and other materials with respect to the engagement of accountants for the Receiver. Draft motion for the appointment of accountants for the Receiver and the proposed order.	0.60
	CMT	K522	A104	Further and more detailed review of financial information in asset lists being provided by the defendants in order to determine what additional is needed. Draft communications to counsel for the defendants with respect to deficiencies and issues found with the extent of the production to date.	1.70
	CMT	L210	A103	Review of court dockets for all proceedings where one of the entities subject to the receivership order is currently involved. Draft notices of appearance and notices of stay to be filed in all of the cases where a receivership defendant is a party.	1.30
	NDS	L320	A108	Add'l with communications with John Atchley re Nuvei Tech	

					Hours
				production	0.40
	NDS	L320	A110	Receipt of credentials for Nuvei Tech productions; facilitated retrieval of over 300 documents, preserved; updated master records	0.40
	CDC	L110	A104	Correspondence with co-counsel and receiver.	0.40
	CMT	L120	A108	Communications with prior attorney for the corporate defendants and review of procedures for resolving the disputed or unpaid claims.	0.30
	CMT	L120	A104	Review of case law on the issue of whether a receiver appointed by the federal court can waive the attorney-client privilege.	0.40
	CMT	L210	A103	Finalization of the filing of notices of the stay of proceedings in all cases where there is pending litigation involving the corporate defendants.	0.40
	NSP	L110	A102	Legal research re: whether Court appointed Receiver can waive attorney-client privilege.	1.50
05/09/2026	JHW	L120	A104	Reviewed research re: receiver's waiver of attorney-client privilege.	0.10
05/11/2026	NDS	B210	A104	Receipt/review of Receivership invoices (x3); updated account of and preservation of records; provided updated record to attorneys	0.40
	CMT	L120	A108	Participation in the initial telephone conference with attorneys from the Department of Justice.	0.30
	CMT	L120	A108	Setting up procedures for additional communications from victims in order to effectively respond to questions, deal with payments and be responsive. Participation in communications with attorneys handling victims issues.	1.20
	CMT	K504	A104	Review of financial statements of defendant entities in order to identify loans and accounts receivable.	0.40
	CMT	K504	A104	Preparation of communication to the general counsel for the Broward County Tax Collector's office in order to obtain a paper title for the vehicle to be sold at auction.	0.20
	CDC	L110	A104	Correspondence with co-counsel for receiver regarding strategy.	0.40
	CDC	L110	A103	Correspondence with Premier.	0.30
	CDC	L110	A103	Correspondence with Michael Loder.	0.20
	CDC	L190	A104	Review case filings and orders, including Order Granting Motion to Employ Accounting Professionals, motion to release funds, Order expediting response to motion to modify preliminary injunction,	0.50
	JHW	B210	A105	Emails with counsel re: Innovative invoices to be paid.	0.20
	JHW	L120	A105	Discussions with paralegal re: obtaining login information for Paychex from Defendants.	0.20
05/12/2026	CMT	L210	A104	Review of additional litigation found be filed in the Circuit Court for Palm Beach County where Ahmed is the plaintiff. Communication from the attorney for one of the defendants. Preparation of notice of appearance and suggestion of stay for the Palm Beach County Case. Review of issues with respect to an additional Broward County Circuit Court case where the stay	

					Hours
				should also be applicable.	0.60
	CMT	L210	A104	Review of financial statements provided by the defendants with respect to pending litigation. Work in creating a search of the courts of the three S. Florida counties in order to determine if there is other litigation involving any of the defendants in the receivership action.	0.40
	DAR	L100	A109	Appear for/attend legal team status meeting.	0.80
	DAR	L100	A109	Appear for/attend Teams Meeting with accounting team.	0.90
	CMT	L120	A105	Dissipation in receivership team meeting and order to go over 20 action items for current and next steps.	0.70
	CMT	L120	A108	Participation in virtual meeting with the FTC team on next steps and a possible special enrollment opportunity.	0.40
	NDS	B210	A109	Appeared for/attended receivership strategy conference regarding actions items, including but not limited to entity business business operations and financials, deposition, assets and identification of, etc.	0.70
	NDS	B210	A109	Appeared for/attended starategy conference with Kaufman Rossin (accountant) and attorneys regarding receivership/management of entity business operations, finanicals, assets, identification of, reporting, etc.	0.90
	CDC	L120	A108	Conference with Kaufman Rossin.	0.90
	CDC	L110	A103	Correspond with prior counsel.	0.20
	CDC	L120	A105	Internal meeting.	0.80
	CDC	L110	A103	Correspondence re Clear Tec and research into same.	0.60
	CDC	L110	A104	Review of various internal correspondence from innovative receiver inbox.	1.10
	CDC	L110	A102	Continued review and investigations into state court cases involving Innovative.	0.90
	CMT	L120	A108	Participation in virtual conference with the Kaufman Rossin team on assignments for the accounts for the Receiver.	0.90
	NDS	C100	A101	Started review of productions records, for identification of records to send to account for analysis; initiated share file and added business financial	0.40
	JHW	L120	A105	Strategy discussions internally re: waiving attorney-client privilege post-Receivership.	0.20
	JHW	L120	A105	Attended litigation strategy meeting with counsel to discuss outstanding action items.	0.80
	JHW	L120	A108	Attended meeting with Kaufman Rossin re: accounting functions for receivership.	0.90
	JHW	L120	A103	Revised/edited Receiver's Response to Defendants' Motion to Modify PI to Release Funds for Attorney Fees, including additional research and drafting argument.	1.60
	JHW	B210	A108	Call/emails with Vista Bank re: setting up insured sweep accounts for receivership entities and authorizing Kaufman Rossin's access to accounts.	0.20
	JHW	B210	A108	Returning call from member asking about health plan benefits.	0.10
05/13/2026	CMT	K509	A108	Responding to three separate requests for documents and information from claimants where legal issues are involved.	0.40
	CMT	K512	A104	Review of termination provisions of the lease for the office facilities in Coral Springs. Draft communication to the landlord for the voluntary termination of the lease and the waiver of	

				Hours
			cleanup charges.	0.30
NDS	C100	A101	Continued review of productions records, for identification of records to send to account for analysis; appended sharefile with additonal business financials and statements	0.30
NDS	C100	A108	Correspondence w/Kaufman Rossi regarding business financials and action items/task	0.30
CMT	K512	A104	Additional review of the office lease and addendum as well as other materials in order to determine that the receivership estate may have no responsibility. Review of legal issues involved with the tenancy by the receivership entities without a lease. Draft notice to the landlord of potential settlement.	1.20
CMT	K504	A108	Multiple communications with the general counsel for the tax collector of Broward County Florida with respect to obtaining a title to the vehicle to be sold at auction. Preparation of document package needed in order to obtain the paper title for the vehicle to be sold at auction.	0.80
CMT	L120	A108	Participation in virtual conference with Steven Wernikoff in order to gain additional facts and information concerning the operations of the various businesses.	0.40
CDC	L110	A108	Prepare for and conduct call with Mike Lober, and prepare summary of same.	1.10
CDC	L120	A104	Review of Judge Leibowitz's order in Innovative's adjacent federal court litigation and correspond with plaintiff's counsel regarding same.	0.40
CMT	K525	A104	Review of available materials and communications with attorneys for the receivership entities with respect to prior tax returns for the entities.	0.40
CMT	L120	A104	Review of court records in the three S. Florida Cos. in order to determine if there is other litigation involving any of the defendants in the FTC action where there is litigation pending an action needs to be taken on behalf of the Receiver.	0.70
CDC	L110	A104	Correspondence regarding various state court litigation.	0.50
CDC	L110	A104	Review spreadsheets containing summaries of regulatory complaints.	0.70
CDC	L110	A103	Correspondence re Paychex and with Paychex.	0.90
CDC	L110	A104	Review of Palm Beach and Broward dockets pertaining to Bottley litigation and correspond with his counsel re same.	0.60
NDS	B210	A108	Receipt/review of multiple messages from Kevin Brooks w/Esquire regarding records/accounts, preserved Statement; responded to inquires	0.30
JDP	L140	A109	Appear for/attend Visit county tax collectors office to obtain vehicle title	1.80
DAR	L210	A103	Draft/revise response in opposition to motion to unfreeze assets.	3.30
JHW	L120	A103	Continued researching and revising Response to Defendants' Motion to Unfreeze Assets for payment of attorney's fees.	1.50
JHW	B210	A110	Reviewed outstanding invoices and paid invoices, including communications with various vendors to obtain wire instructions.	1.60
JHW	B210	A108	Emails with Vista Bank and with Kaufman Rossin re: setting up KR's access to accounts.	0.20

					Hours
05/14/2026	NDS	B210	A108	Communicate (other external) with Elise w/ABC legal re service invoices, relayed information to counsel	0.20
	CMT	L300	A104	Review of areas of inquiry to be included in the notice of deposition of the designated representatives of each of the defendant entities.	0.30
	CMT	K509	A108	Telephone conference with the attorney representing the venture capital firm the claims to be a $3 million plus secured creditor on status of the proceeding.	0.20
	JDP	L120	A104	Review/analyze Gather data regarding enrollment status of clients and state of residence via provided spreadsheet data.	1.30
	CMT	L120	A104	Reviewing facts and documents in order to determine the interrelationship of Prosperity Health L LC to the corporate defendants and the individual defendants in order to determine if it should be part of the receivership proceeding.	0.90
	CMT	L120	A104	The review of corporate records with the Secretary of State of Florida and other issues with respect to the disposition of assets of a Florida LLC that has been voluntarily dissolved.	0.40
	CMT	L330	A103	Review and augment the designated areas of inquiry for the corporate defendant representatives for the notices of deposition to BE served in accordance with Federal Rule 30(b)(6). Preparation of communication to counsel for the corporate defendants providing the list of areas of inquiry for the notice of deposition.	0.60
	CDC	L110	A104	Review of communications regarding Prosperity.	0.30
	CDC	L120	A105	Confer with Receiver and co-counsel regarding claims handling, including correspondence with Premier.	0.80
	CDC	L110	A108	Correspondence regarding accounting, including calls with Mitchell Glass.	0.40
	CDC	L110	A103	Prepare 30(b)(6) areas of inquiry for depositions of entities and confer re same.	1.40
	CDC	L120	A105	Internal communications regarding depositions and information needed.	0.40
	CDC	L120	A104	Communications regarding Paychex and review of spreadsheet containing pertinent information regarding operations.	0.70
	DAR	L120	A108	Communicate (other external) w/ CMT & FTC team re objection to fee motion.	0.20
	NDS	L330	A103	Drafted Subpoenas on Corporate Representatives for Innovative, Health Plan Administrators, Papyrus and American Collective	1.20
	DAR	L210	A103	Revise response in opposition to motion to unfreeze assets and coordinate filing.	0.50
	JHW	B210	A108	Reviewed voicemails from victims and returned calls; strategy emails with counsel re: answering questions of victim.	0.40
	JHW	L120	A105	Discussions with counsel re: outstanding litigation items and task list.	0.90
	JHW	B210	A108	Multiple calls and emails with Paychex re: obtaining portal access and statements for receivership entities.	0.30
05/15/2026	NDS	B210	A108	Communications with Mr Brooks w/Equitable regarding accounts	0.10
	NDS	L330	A103	Revised Subpoenas for deposition on Corporate Rep's of	

					Hours
				Entities (Innovative/American Collective/HPA/Papyrus) in accordance with attorney request	0.20
	CMT	L300	A103	Work on finalization of the discovery that will be filed against the corporate defendants in order to obtain missing information concerning the operation of the various businesses. Communicating with counsel for the defendants with respect to the need for a response involving the absence of information being provided to the Receiver.	0.70
	CMT	L210	A103	Review of law and facts in order to formulate the necessary support for a motion to add Prosperity Health, LLC to the receivership proceeding. Draft motion to add Prosperity Health LLC to the receivership proceeding.	0.90
	CMT	L120	A108	Participation in virtual conference with the attorney for Fidelity Investments with respect to the disposition of an account that has been seized.	0.40
	CMT	L120	A104	Ongoing legal and factual review of the issues surrounding the possibility of bringing other entities and the individuals within the purview of the receivership order.	0.60
	CDC	L110	A103	Review/revise subpoenas and forward same to defense counsel.	0.40
	CDC	L110	A103	Correspondence re Clear Tec.	0.30
	CDC	L110	A108	Correspondence with defense counsel regarding pending discovery and depositions, including internal communications with co-counsel regarding same.	0.40
	NDS	B210	A105	Conferred with attorney Ray regarding case, productions	0.20
	NDS	B210	A105	Communicate (in firm) with attorney Wahba re pending Receivership expenses	0.20
	JHW	B210	A110	Paid several outstanding invoices, including calls/emails with multiple entities re: obtaining updated balances for invoices.	1.00
	JHW	L120	A103	Drafted letter for consumer to present to healthcare.gov regarding termination of health plans.	0.40
05/16/2026	CMT	L120	A104	Detailed review of lease and amendment as well as financing statement filings in Florida in order to see if the landlord has rights to assets. Review of issues relating to the dissolution of Prosperity Health as the tenant.	0.80
05/18/2026	CMT	L210	A103	Additional work to obtain additional information on Prosperity Health LLC and to augment the motion to bring the entity into the receivership estate.	0.70
	CMT	K512	A104	Additional review of all agreements with the Coral Springs office facility landlord and corporate filings in order to deal with claims of the landlord in owning personal property.	0.40
	DAR	L110	A104	Review landlord lease & confer with CMT regarding provisions of same.	0.60
	NDS	B210	A104	Review/analyze Entity Financial Statements for identification of vehicle assets, reported finding to attorney	0.20
	JDP	L140	A110	Manage data/files Review and document claim forms on master spreadsheet	0.60
	CMT	L120	A104	Review of all available financial information, corporate recording data and communications in order to substantiate the need to bring Safe Guard Management, LLC into the	

					Hours
				receivership proceeding.	0.80
	CDC	L110	A103	Communications with Receiver and co-counsel re pending issues.	0.90
	CDC	L110	A108	Communications with defense counsel.	0.70
	NDS	B210	A104	Receipt/retrieved/preserved records received from Bank of America	0.30
	DAR	L110	A104	Review/analyze document recovered to date, inventory same, investigate suspected equity stake holders.	2.60
	DAR	L110	A104	Investigate corporate formation history of receivership entities and affiliated entities/persons.	2.50
	JHW	B210	A110	Attempted to log into various platforms with login credentials provided by defense counsel.	0.50
	JHW	P250	A104	Internal meetings re: assistance with various receivership projects.	1.00
05/19/2026	NDS	B210	A104	Reviewed/installed business cost reimbursement receipts master report for processing	0.20
	CMT	L120	A104	Additional review of sworn financial statements in order to create additional areas of inquiry for the informal discovery.	0.40
	NDS	B210	A108	Receipt/review of correspondence from ABC legal regarding account balance; contacted Elise Davila w/ABC regarding the same	0.20
	NDS	B210	A104	Review/analyze communications from Woodforest Bank regarding Receivership demand; contacted Sophia Garza regarding account/records	0.30
	DAR	L120	A108	Attendance at conference w/ FTC team.	0.90
	NDS	B210	A104	Receipt/review of American Van Lines - Invoice #602253, for moving office contents; preserved records for AP	0.20
	NDS	B210	A102	Research communications received from entity banks providing access to account records, facilitated creation of credentials for counsel access to records Chase and Bank United	0.60
	NDS	B210	A101	Work on updating master inventory of records of demands/production request with pertinent information to assist with timelines, etc. for counsel preparation of motions to compel	0.40
	NDS	B210	A104	Receipt/review of Bank United correspondence, preserved produced records FOR 12 accounts, analyzed Statement/summary, comparisons to Summary produced to FTC; updated inventory records with pertinent information	0.60
	NDS	B210	A109	Appear for/attend conference with FTC, Receiver, and counsel's regarding actions items, including but not limited to deposition strategy for Corporate reps', expanding Receivership for newly identified entities, newly identified business accounts, etc.	0.80
	CDC	L110	A108	Correspond with co-counsel regarding pending actions and various individuals in preparation for call with FTC.	0.30
	CDC	L110	A108	Call with FTC.	0.90
	CMT	L120	A108	Dissipation in virtual conference with the FTC legal team with respect to net steps and moving forward on various items to recover assets.	0.90
	CMT	L120	A108	Dissipation and telephone conference with the attorney for the	

					Hours
				Coral Springs landlord in order to try to reach a settlement of open disputes.	0.30
	CMT	K505	A103	Work in preparing the documentation necessary to transfer the title for the sale of the BMW vehicle.	0.20
	NDS	B210	A108	Receipt/retrieved/preserved American Express records	0.30
	JDP	L100	A110	Manage data/files Review/respond to claim emails inbox for tracker records processing.	1.80
	NDS	B210	A108	Receipt/retrieved/preserved Chase account records	0.30
	DAR	L110	A104	Review electronically stored documents to determine state of production.	2.20
	CDC	L110	A103	Communicate with defense counsel and prepare formal questions to be answered in lieu of depositions.	1.90
	CDC	L110	A108	Communications with defense counsel regarding pending information.	0.60
	JHW	L120	A110	Attended meeting with Defendants' counsel to attempt to resolve two-factor authentication issues for Google workspace logins; continued resolving log-in issues including changing recovery phone number and email address for google accounts.	0.90
	JHW	B210	A110	Paid subscriptions for Quickbooks accounts to restore access; emails with Kaufman Rossin re: same.	0.40
	JHW	B210	A110	Internal meeting regarding assistance with action items.	0.30
	JHW	L120	A108	Attended meeting with FTC's attorneys re: outstanding litigation items and next steps.	0.90
	JHW	L120	A104	Reviewed document production from Defendants to determine access to website management, phone management systems, and Google Suite Access; emails with Defendants' counsel re: same.	1.40
	JHW	B120	A105	Strategy emails with counsel re: banks' non-compliance with demand letters requesting wiring of funds to Receiver.	0.40
05/20/2026	NDS	B210	A108	Receipt/retrieved/preserved Credit Reports for Ahmed and Armani Shokry	0.20
	CMT	L120	A104	Additional review of all financial information in order to substantiate the Receiver's position that Safe Guard Management, LLC should be included as a receivership entity. Review of court orders as to procedures. Draft notice to the attorneys for the defendant of the receiver's taking charge of the assets of Safe Guard Management, LLC.	1.20
	CMT	L120	A104	Review in detail of the provisions of this stipulated preliminary injunction and other orders in order to determine the responsibility of the Receiver and his professionals with respect to submitting fee requests and status reports to the court as well as what is necessary for the required accounting. No time billed as an accommodation for administrative housekeeping work.	
	NDS	B210	A104	Receipt/review/analyze Woodforest National Bank's Sworn Statement, updated records	0.30
	DAR	L140	A105	Confer w/ N. Santoro on document indexing and availability.	0.20
	CDC	L110	A108	Prepare for and communicate with OC in Motiwalla federal court case.	0.40
	CDC	L110	A108	Communications with counsel for Premier.	0.70

					Hours
	CDC	L110	A104	Internal communications with receiver and co-counsel.	1.20
	JHW	B210	A110	Paid outstanding invoices.	0.60
	JHW	L120	A105	Strategy emails with counsel re: requesting court authority to bring Safe Guard into receivership.	0.40
	JHW	B210	A108	Attended call with FTC's counsel and IT re: exporting Google Suite admin account data.	0.80
	JHW	L120	A105	Meeting with counsel re: strategy for responses to Premier of outstanding questions.	1.20
05/21/2026	NDS	B210	A108	Communicate (other external) with Alex Fasano w/Fidelity re the production	0.20
	NDS	B210	A108	Call with Tina w/Bank of America regarding our subpoenas records	0.30
	JDP	L100	A109	Appear for/attend Meet moving company at Coral Springs office to facilitate moving of computers to our office per FTC request.	1.40
	NDS	B210	A105	Communicate (in firm) with attorney Tatelbaum regarding information obtain from Bank of America, provided drafted email to Bank of America regarding our subpoena/their production	0.30
	NDS	B210	A110	Receipt/review of correspondence and Demand issued to Paynote by Seamless, updated report	0.20
	NDS	L330	A104	Reviewed District Court requirements forms for subpoenas w/depositions; created subpoena form for the same	0.40
	NDS	L330	A103	Conducted web search for Miguel Salazar, prior employee, reviewed business records; prepared subpoena for deposition	0.30
	NDS	L330	A103	Conducted web search for Travis Bracewell, prior employee, reviewed business records; prepared subpoena for deposition	0.30
	NDS	L330	A105	Discussion with attorneys regarding case depositions, handling and preparing for	0.20
	NDS	B300	A108	Call with Joseph Crescenzo w/Woodforest Bank regarding customer contacts and chargebacks	0.30
	NDS	L330	A103	Revised subpoenas for Deposition on Miguel Salazar and Travis Bracewell to include additional deposition information; finalized for service; correspondence re the same	0.30
	NDS	L330	A108	Communication exchange with FTC regarding login credentials from returned computers; preserved records from Innovative.	0.20
	RFB	L300	A104	Review/analyze: Review of Discovery Docs from Innovative for purposes of summarizing same.	5.30
	CDC	L110	A104	Internal correspondence regarding action items, including review of invoices, Order on Prosperity Motion, and setting depositions.	0.80
	JHW	L120	A105	Emails with counsel re: work performed by Defendants' pre-receivership hired attorney and payment of invoice.	0.20
	JHW	B120	A108	Emails with FTC re: Paynote by Seamless response to FTC's TRO letter.	0.20
	JHW	B120	A108	Revised draft letter to Paynote by Seamless to recover frozen funds and emails with contact person re: same.	0.40
	JHW	L120	A108	Reviewed draft supboenas for depositions to Salazar and Bracewell; emails with FTC re: same.	0.30
	JHW	B210	A108	Call with consumer re: explaining receivership process and providing alternatives for enrollment; emails with counsel re:	

					Hours
				same.	0.50
	JHW	B120	A104	Reviewed spreadsheets with logins provided by FTC and attempted some logins (Caryn Health, Ring Central).	0.50
05/22/2026	NDS	B310	A108	Communication (other external) with Joe Cresdenzo w/Woodforest Bank regarding handling of customer contacts and chargebacks	0.30
	RFB	L300	A104	Review/analyze discovery docs from Innovative for purposes of summarizing same.	1.90
	NDS	L330	A108	Receipt/review of Return of Service on Travis Bracewell subpoena, updated records; relayed information to attorneys	0.20
	DAR	B110	A105	Status meeting with receiver and attorney team.	0.60
	DAR	B110	A108	Teams meeting w/ K&R accounting team re procedures and status of retention.	0.70
	NDS	L330	A108	Receipt/review of service update of subpoena on Miguel Salazar; informed counsel of the same	0.10
	NDS	B210	A108	Receipt/review of correspondence from JP Morgan Chase re production, responded to their request for extension	0.20
	CMT	L120	A105	Participation in team conference in order to coordinate obtaining the information that is being withheld by management of the defendant entities and third parties.	0.60
	CMT	L120	A108	Participation in virtual conference with the outside accounting team for the Receiver in order to assign tests, coordinate efforts, and respond to questions dealing with the engagement.	0.70
	JHW	L120	A105	Discussions with counsel re: outstanding litigation items and missing information from Defendants' counsel.	0.60
	JHW	L120	A108	Strategy meeting with Kaufman Rossin re: setting up accounting processes for receivership entities and missing data/information needed.	0.70
	JHW	L120	A108	Call/emails with Vista Bank re: HPA receivership account and setting up Kaufman Rossin with access to IntraFi sweep accounts.	0.20
05/23/2026	CMT	K512	A104	Final review of Coral Springs lease. Draft notice of termination sent to the attorney for the landlord.	0.30
	CMT	L120	A104	Initial review of the information provided by the attorney for the defendants in lieu of deposition testimony.	0.40
	CMT	K512	A108	Written and telephonic communications with the attorney for the landlord in order to facilitate the termination of the Coral Springs office facility lease.	0.20
05/24/2026	JHW	B210	A108	Emails with FTC IT re: logging into IP and AC Gmail accounts.	0.10
05/25/2026	DAR	C200	A102	Research waiver of attorney client privilege by appointed fiduciaries under federal and state law, client property rights in legal files as property under FL & CA law.	2.40
05/26/2026	CDC	L110	A104	Review Defendant's REPLY in Support of Motion To Modify Preliminary Injunction.	0.30
	CDC	L110	A104	Review internal correspondence relating to action items and investigation.	1.10
	CDC	L110	A103	Revise letter to MSK law firm.	0.60

					Hours
	NDS	B210	A108	Receipt/review of 4 emails from Woodforest Bank, preserved produced records, responded to the same	0.30
	CMT	L120	A108	Participation in virtual meeting with counsel for the defendants on adding entities to the receivership estate.	0.30
	CMT	L120	A104	Detailed review of all available materials and financial on the two entities to be added to the receivership estate in order to preapre for any hearings.	1.90
	CDC	L110	A104	Correspondence with Paychex, including review of pertinent attachments.	0.40
	CDC	L110	A104	Internal correspondence regarding additional receivership entities.	0.40
	CDC	L120	A104	Review informal discovery responses from defense counsel and confer re same.	1.40
	JDP	L100	A109	Appear for/attend Visit Coral Springs office and survey location after Auction	1.40
	JHW	B210	A110	Approved ACH Payments.	0.10
	JHW	B210	A108	Emails with Kaufman Rossin re: following up on outstanding action items; multiple emails with Paychex; resolved outstanding issues with Quickbooks and emails/calls with Vista Bank re: same.	2.50
	AJD	P210	A104	Reviewed Letter re. demand to cease activity of MSK.	0.30
	JHW	B210	A108	Emails with Chargeback Gurus re: post-receivership services rendered.	0.10
	JHW	B120	A105	Emails with counsel re: business conducted by Prosperity Health and Receiver's position of bringing SafeGaurd into receivership.	0.30
	JHW	L120	A103	Reviewed and revised draft Correspondence and Litigation Hold letter to Mitchell Silberberg & Knupp.	0.20
	JHW	B100	A105	Emails with counsel and PR administrator re: providing website and update to new consumers on additional spreadsheet.	0.30
05/27/2026	DAR	L100	A109	Teams meeting w/ FTC, prepare summary email to all personnel.	1.00
	NDS	B210	A104	Review/analyze Bank of America records for identification of accounts ending 8159, 9424; provided findings to counsel	0.40
	DAR	L100	A105	Confer w/ JW re outstanding issues (real property)	0.20
	DAR	L100	A105	Confer w/ CMT re outstanding issue with secondary office space.	0.20
	DAR	L300	A103	Draft/revise notice and demand letter to California law firm, coordinate service of same by fed ex & email.	0.60
	NDS	B210	A102	Research potential new business address of defendants, provided findings to counsel for further investigation	0.40
	NDS	B210	A104	Review/analyze produced records, work on segregating financial records for accountant	0.60
	NDS	B210	A108	Finalized sharefile financial records for accountants and provided the same	0.20
	CDC	L210	A104	Review response to motion to add Prosperity as a Receivership entity.	0.20
	CDC	L110	A103	Communications with Dane Leitner regarding state court matters.	0.60
	CDC	L110	A108	Prepare for and conduct call with Premier; follow up email to Premier regarding project plan.	1.30

					Hours
	CDC	L110	A104	Prepare for and conduct call with defense counsel.	0.50
	CDC	L120	A108	Prepare for and conduct call with FTC.	0.90
	CDC	L110	A104	Correspondence with FTC.	0.40
	CDC	L110	A103	Review and provide answers to Receiver's questions.	0.90
	CDC	L120	A104	Numerous internal communications with co-counsel for Receiver regarding various matters, including action items.	1.70
	CDC	L110	A104	Review agency spreadsheet.	0.40
	NDS	B210	A104	Review/analyze Shorky property records, analyzed business statements related to	0.90
	JHW	B210	A110	Approved ACH payment.	0.10
	JHW	L120	A108	Emails with Paychex re: confirmation of American Collective payroll records.	0.10
	JHW	L120	A104	Reviewed Defendants' informal responses to potential deposition topics; provided analysis of follow-up questions and outstanding information still needed from Defendants' counsel.	1.10
	JHW	L120	A105	Emails with counsel re: discussing progress and action items on several pending litigation issues.	0.40
	JHW	B120	A108	Meeting with Premier and counsel re: insight into Premier's operations, including post-call discussions/emails with counsel of action items.	1.00
	JHW	L120	A108	Attended update call with FTC re: Defendants' informal discovery responses.	0.80
	JHW	L120	A108	Call with Defendants' counsel re: conferral on informal discovery requests; post-call communications with counsel re: same.	0.80
05/28/2026	NDS	B210	A104	Review/analyze Shorky property tax records, payment information for identification of business accounts	0.30
	NDS	B210	A108	Communicate (other external) with accountant Christine Vives regarding entity financials	0.20
	NDS	B210	A105	Communicate (in firm) with attorney Cohen re Innovative Partners / American Data Active Customer lists received, issues with	0.20
	NDS	B210	A109	Appear for/attend conference with attorneys and Kaufman Rossin team regarding various items relating to business transactions, including but not limited to suspicious transactions	0.40
	NDS	B210	A109	Appear for/attend conference with attorney Wahba and Christine VIves and Silvana Robles w/Kaufman Rossin regarding business entity account standings, processing of accounts payables, handling of, etc.	1.00
	NDS	B210	A105	Receipt/review/preserved photos from Coral Springs office walk through w/Owner	0.20
	CMT	L210	A103	Review of all of the data gathered for the Safe Guard affiliated entity. Preparation of motion to include Safe Guard as a receivership entity.	0.80
	CMT	L120	A108	Participation in virtual conference with the accounting firm representing the receiver. Review of transactions and disbursements after the temporary restraining order was entered for potential recovery.	0.60
	CMT	L120	A104	Work in gathering information and materials with respect to Ahmed Shokry's related entities and actions that he has taken	

					Hours
				in violation of the temporary restraining order for potential recoveries.	1.10
	DAR	B110	A109	Appear for/attend Teams meeting w/ accounting team.	0.50
	CDC	L110	A108	Communications with Josh Spoont.	0.50
	CDC	L120	A104	Review bank activity.	0.70
	NDS	B210	A104	Receipt/review of Fidelity messages (x2) and correspondence (x2) regarding entity accounts; preserved production records, updated internal reports	0.40
	NDS	B210	A101	Work on updating accessibility and credentials for JP Morgan Chase re entity productions; internal correspondence with attorney regarding the same	0.30
	JDP	L100	A109	Appear for/attend Visit Coral Springs office to meet with building owner about property	1.20
	JHW	B210	A108	Logins with IT team to re-route IP/AC websites to Receiver's website.	0.30
	JHW	B210	A108	Call with Premier's counsel re: shutting down of AC/IP phone lines; discussions internally re: same and how to resolve issue.	0.30
	JHW	B210	A108	Status update meeting with Kaufman Rossin on financial analysis.	0.60
	JHW	B210	A105	Emails with paralegal re: updating annual reports for four receivership entities.	0.20
	JHW	B210	A110	Attended Bill.com training with KR and discussions re: frozen bank accounts transferred to Receiver.	1.10
	JHW	B210	A105	Discussions with counsel on multiple outstanding litigation items.	0.90
	JHW	B120	A108	Emails with FTC re: proper contact person at Seamless to receive legal notice; forwarded Seamless demand letter to additional individuals.	0.20
	JHW	B210	A111	Transfer of funds between IP account and HPA/Papyrus on recommendation of KR and emails internally re: same.	0.20
	JHW	B120	A103	Began revising/editing Receiver's Expedited Motion for Appointment of Receiver for Safe Guard Management.	0.60
	CDC	L110	A104	Review spreadsheets from Premier re member lists.	0.50
	CDC	L110	A103	Internal correspondence with receiver and co-counsel regarding action items (pending and future).	2.20
05/29/2026	NDS	B210	A104	Assisted counsels with review/analysis of case correspondence (several dozens), meeting agendas and notes, created report of strategic task and actions items, to assist receivership team; correspondence w/team relating to	2.20
	CDC	L110	A108	Prepare for and conduct call with Premier.	0.70
	CDC	L120	A104	Communications with co-counsel for receiver re strategy and action items.	0.40
	JHW	B210	A110	Approved ACH payment.	0.10
	JHW	L120	A103	Continued revising/editing draft Motion to include Safe Guard Management in receivership; emails with Defendants' counsel re: conferral on motion.	1.70
	JHW	B120	A108	Continued accessing various logins and websites provided by Defendants' counsel; resumed operations of Ring Central; discussions with counsel re: litigation action items.	1.90
	JHW	L120	A108	Meeting with Premier's team to discuss getting business up and running and additional items needed from them.	0.40

Federal Trade Commission
May 31, 2026
Account No: 221495-0001
Statement No: 1

Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partners & multiple entities

				Hours	
JHW	B210	A108	Voicemail and email with Caryn Health's counsel re: scheduling meeting to address Receiver's access.	0.10	
JHW	B210	A108	Emails with Kaufman Rossin re: quickbooks issue and funding of all 4 entities.	0.10	
CDC	L210	A104	Review/revise Motion to Add Safeguard as a receivership entity.	0.50	
			For Current Services Rendered	479.10	267,837.50
			Courtesy Discount		-107,135.00
			Net Fees after Courtesy Discount		160,702.50

Recapitulation

Timekeeper	Hours	Rate	Total
Charles M. Tatelbaum	123.40	$825.00	$101,805.00
Alex J. Diaz-Thomas	17.40	400.00	6,960.00
David A. Ray	54.80	700.00	38,360.00
Jeremy D. Perkins	41.20	275.00	11,330.00
Nikeisha S.W. Pryor	12.20	525.00	6,405.00
David A. Levine	16.80	475.00	7,980.00
Jennifer H. Wahba	51.90	500.00	25,950.00
Richard F. Borrello	7.20	175.00	1,260.00
Corey D. Cohen	100.60	500.00	50,300.00
Lexy Semino	5.50	420.00	2,310.00
Seth J. Donahoe	6.00	600.00	3,600.00
Nicole D. Santoro	42.10	275.00	11,577.50

Total Current Work 160,702.50

Balance Now Due $160,702.50

Tripp Scott, P.A.
110 Southeast 6th Street
15th Floor
Fort Lauderdale, FL 33301
Telephone (954)-525-7500 * Fax (954) 761-8475
Tax ID 59-2624630

Federal Trade Commission

Date: May 31, 2026
Invoice No. 1-A
Account No. 221495.0001
Page: 1

RE: Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partner

Interim Statement

Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partners & multiple entities

					Hours
04/15/2026	POL	P280	A107	Various emails and phone conferences with counsel and with FTC re: serving subpoenas and issuing freeze orders	1.80
	POL	K501	A104	Review of sealed filings received from FTC and Order re: Receivership; confer with counsel and legal team to ensure that team is ready to assist FTC with seizing assets.	2.70
04/16/2026	POL	P280	A108	Various phone calls and communication with Receivership team re: coordinating efforts with FTC to seize assets (1.7); communication with various law enforcement agencies to assist with raid (1.4); communication with Judge Singhal re need to seek assistance from US marshals (.7)	3.80
	POL	K501	A108	Various extended conference calls with law enforcement to assist with FTC to seize assets of party under Receivership order and confer with counsel re: various safety concerns and strategies to ensure no danger. Communicate (other external)	3.40
	POL	K501	A108	Various calls with counsel re: strategy in working with FTC and US Marshal's office to seize and protect assets	1.80
04/21/2026	POL	K501	A109	On-site inspection and visit of offices and meeting with FTC lawyers re: status of receivership	2.40
	POL	K501	A105	communication with legal team re: open items and next steps in connection with gather information relating to companies' operations	1.90
	POL	K501	A104	review of materials received from FTC re: background investigation and review of multiple emails from counsel for defendants re: production or records and compliance with TRO	2.30
	POL	K501	A108	communication with federal judge re: status and timing of unsealing record and update legal counsel re: same	0.40
04/22/2026	POL	K501	A105	Various emails and communications with legal team and with	

					Hours
	POL	K501	A105	FTC legal team and investigators re: on-going issues re: status of Receivership and claims against the defendants	3.40
				meeting with legal team and review of voluminous analysis and reports re: background investigation conducted by FTC	4.20
04/23/2026	POL	K501	A104	Review of voluminous materials received relating to the operations of companies in Receivership	3.70
	POL	K501	A107	various calls and communications with lawyers representing companies in Receivership and discuss overall next steps with legal counsel	2.60
04/24/2026	POL	K501	A104	Review of additional materials and information provided by counsel representing companies in Receivership and confer with counsel re: same.	1.80
04/27/2026	POL	K501	A104	Review of various emails and documents from counsel for the defendants and confer with legal team re: next steps	1.70
	POL	K501	A104	review of bank account applications and begin setting up secured system to have funds transferred and safeguarded as part of Receivership	1.10
	POL	K501	A104	receipt and review of preliminary injunction order and review of notifications from Court re: upcoming hearing on preliminary injunction	0.80
04/28/2026	POL	K501	A104	Receipt and review of various emails and filings by defense counsel and FTC counsel and phone conference with FTC counsel re: status of Receivership and status of information requested.	4.20
04/29/2026	POL	K501	A108	Meeting with FTC lawyers in advance of preliminary injunction hearing	1.80
	POL	K501	A104	receipt and review of various emails from counsel for the defendants in relation to preliminary injunction hearing and review of court's order re: denying extension of time for hearing	1.20
	POL	K501	A109	attend federal court proceedings on preliminary injunction	2.30
04/30/2026	POL	K501	A109	Meeting with FTC in advance of hearing on contempt hearings and attend hearing in federal court	2.40
	POL	K501	A104	review of requests for information send to defense counsel and discuss with legal team need to potentially file motion to compel	1.30
05/01/2026	POL	K501	A104	Review of motion to compel and confer with legal team re: strategy in dealing with on-going efforts to obtain passwords to access emails and computer servers	1.40
	POL	K501	A107	conference call with counsel for the defendants re: status of receipt of information and status of companies	0.60
	POL	K501	A104	review of discovery prepared by FTC in connection with video and pictures of activities taking place at defendants' offices	0.70
	POL	K501	A104	review of notifications sent to consumers and begin outlining appropriate response to consumers sending in inquiries re: status of plan and benefits	1.60

					Hours
05/04/2026	POL	K501	A104	Receipt and review of various materials submitted by defendants' attorneys and review of updates from FTC counsel re: negotiations for entry of preliminary injunction order	1.70
	POL	K501	A105	coordinate with litigation team necessary steps to ensure continuation of business and coordinate delivery of personal effects of former employees and communication with auctioneer re: steps to clear out property and turn property back over to landlord	2.10
05/05/2026	POL	K501	A104	Receipt and review of various bank forms and agreement and analyze the same in connection with setting up accounts to facilitate payment of bills	1.10
	POL	K501	A105	confer with counsel re: on-going efforts to enter preliminary injunction and review of issues re: defendants' compliance (or lack thereof) with ex-parte TRO	1.30
	POL	K501	A104	review of FTC's position re: unfreezing funds for defense costs and review of defendants' request for the same	0.90
	POL	K501	A104	continue to review of claims coming in from consumers and vendors re: non-payment issues	0.90
05/06/2026	POL	K501	A105	Conference call with counsel re: strategy for upcoming hearing and review of FTC's response to defendants' counsels' request for fees and prepare for status conference before Judge Singhal re: same	1.80
	POL	K501	A108	update with banks re: status of transfers of funds into Receivership estate and review of documentation to coordinate transfer of funds	1.10
	POL	K501	A107	conference call with FTC counsel re: issues relating to hiring of special counsel to pursue claims against third-parties and evaluate merits of the same	0.90
	POL	K501	A104	begin reviewing and analyzing potential third-party claims and fraudulent transferee claims to potentially assert	1.50
05/07/2026	POL	K501	A104	Receipt and review of various updates re: operations of company and emails being received from consumers and confer with counsel re: outside bills and invoices and payment of the same.	3.40
05/08/2026	POL	K501	A104	Receipt and review of updates from counsel re: on-going issues re: operation of businesses and review of various court orders and emails from opposing counsel re: on-going status of Receivership	1.80
	POL	K501	A104	receipt and review of motion filed by counsel for defendants re: lifting freeze to pay attorneys fees and discuss same with counsel	0.80
	POL	K501	A104	review of email from vendor re: request for payment	0.20
05/11/2026	POL	K501	A104	Review of latest updates from counsel re: on-going issues with Receivership and review of court order re: briefing schedule in connection with motion to lift freeze filed by Defendants' counsel.	1.40

					Hours
05/12/2026	POL	K501	A104	Review of materials received from banks re: opening additional accounts	0.90
	POL	K501	A108	conference call with KR re: project to assist with accounting for Receivership and outline protocols for engagement and review of protocols for accounting firms in Receiverships re: providing financial reporting	1.30
	POL	K501	A104	review of defendants' motion to unfreeze accounts for legal fees and discuss strategy with legal team for response to the same	1.20
05/13/2026	POL	K501	A105	Confer with counsel re: on-going operations, business issues and coordinating of setting up Receivership bank accounts; extended communications with banks re: protocols to ensure secure banking and receive training from Vista Bank re: secure deposit mechanism to protect assets of Receivership	3.80
	POL	K501	A104	receipt and review of update from auctioneer re: value of items and status of auction	0.40
05/14/2026	POL	K501	A105	Various meetings and communications with counsel re: on-going efforts to deal with consumer and vendor communications and issues relating to operations of company	1.90
	POL	K501	A104	review of FTC response to defense motion to unfreeze assets	0.80
	POL	K501	A104	analyze preliminary research re: affiliate companies and potentially asserting jurisdiction over said companies in Receivership	1.10
05/15/2026	POL	K501	A108	Confer with auctioneer re: status of auction and research potential reserves for vehicle being sold at auction and confer with legal counsel re: same	0.90
	POL	K501	A105	confer with legal team re: ensuring full compliance by defendants with mandates of preliminary injunction re: information re: operations of the business and review of multiple new communications from customers re: status of plan	1.70
	POL	K501	A104	review of issues re: potentially bringing in additional affiliate company into Receivership	0.80
	POL	K501	A108	continue to work with banks on setting up secure deposit mechanisms to transfer funds and to pay vendors and review of various invoices in advance of payment	0.40
05/18/2026	POL	K501	A105	Confer with counsel re: on-going issues re: operations of business and motion to include additional entity into Receivership; review and edit motion to include additional entity into receivership.	1.80
05/19/2026	POL	K501	A105	Confer with legal counsel re: open issues relating to non-parties to Receivership and lack of cooperation from defense counsel	0.80
	POL	K501	A108	update with FTC re: status and continue to gather information to control domains and phone numbers and continue to work on options for customers to shift customers into a different medical insurance plan	1.20

					Hours	
	POL	K501	A104	review of response from defense counsel in connection with notices of depositions and objections to including Prosperity into Receivership and discuss with counsel	0.90	
05/20/2026	POL	K501	A104	Review of various bills and invoices in connection with verifying transmittal of payment	0.60	
	POL	K501	A104	review of various court orders re: open issues before the court in connection with seeking additional parties to be included in receivership	1.30	
	POL	K501	A108	communication with customers inquiring about status of health plans and payments	1.40	
05/21/2026	POL	K501	A105	Work with team in connection with on-going efforts to pay bills, obtain operational control, confer with auctioneer re: process of selling remaining equipment.	3.10	
05/22/2026	POL	K501	A105	Confer with legal team re: open items owed to Receiver from Defendants	0.70	
	POL	K501	A104	review of areas of inquiry and compare to preliminary injunction	0.70	
	POL	K501	A108	conference call with accountants to discuss protocols for tracing funds and paying bills	0.80	
05/24/2026	POL	K501	A104	Receipt and review of additional information re: potential third-party transferee and review of underlying communications from third-party	0.70	
05/26/2026	POL	K501	A104	Review of records received from counsel and review of previous emails from counsel for the defendants and formulate follow-up questions re: same to internal team of counsel to continue to determine status of active customers and review of emails from customers re: status.	2.30	
05/27/2026	POL	K501	A105	Various updates with counsel re: on-going issues involving customer claims and evaluating benefit of retaining outside third party to assist with customer calls and administration of plan.	1.20	
05/28/2026	POL	K501	A104	Analyze and review potential arrangements with TPAs to keep providing services to customers and review of latest wave of emails from customers and review of draft statements to include in email blast to send to customers in connection with plan benefits.	1.40	
05/29/2026	POL	K501	A104	Review of latest bills and documents from vendors in connection with reinstituting call center and to provide service to customers on an interim basis; review of underlying contracts and agreements with third party vendors and various calls with customers calling re: status of service connected to discount medical plan; review of potential disclosure to send in email website re: services continuing to be provided.	2.30	
				For Current Services Rendered	114.60	97,410.00

Federal Trade Commission
May 31, 2026
Account No: 221495-0001
Statement No: 1

Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partners & multiple entities

	Hours
Courtesy Discount	-38,964.00
Net Fees after Courtesy Discount	58,446.00

Recapitulation

Timekeeper	Hours	Rate	Total
Paul O. Lopez	114.60	$850.00	$97,410.00

Total Current Work	58,446.00
Balance Now Due	$58,446.00

Due upon receipt

Tripp Scott, P.A.
110 Southeast 6th Street
15th Floor
Fort Lauderdale, FL 33301
Telephone (954)-525-7500 * Fax (954) 761-8475
Tax ID 59-2624630

Federal Trade Commission

Date: May 31, 2026
Invoice No. 1-C
Account No. 221495.0001
Page: 1

RE: Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partner

Interim Statement

Paul Lopez as Receiver for Defendants - FTC vs. Innovative Partners & multiple entities

Expenses

04/23/2026	P280	E124	Other (4175) Corey D Cohen = Reimbursement for Expenses Relating to Moving Services at Business Premises	783.65
04/23/2026	P280	E124	Federal Express: Invoice #9-273-55389 dated 4/28/26	40.83
04/23/2026	P280	E124	Federal Express: Invoice #9-273-55389 dated 4/28/26	57.75
04/27/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	42.74
04/27/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	37.02
04/29/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	29.07
04/29/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	29.07
04/29/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	34.78
04/29/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	29.07
04/29/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	29.07
04/29/2026	P280	E124	Federal Express: Invoice #9-283-84666 dated 5/5/26	29.07
05/04/2026	P280	E124	Other (4175) Corey D Cohen = Reimbursement for Parking	24.65
05/19/2026			Photocopies, 5 copies	1.25
05/19/2026	P280	E124	Federal Express: Invoice #9-313-21218 dated 5/26/26	55.38
05/26/2026	P280	E124	Federal Express: Invoice #9-321-38211 dated 6/2/26	69.73
			Total Expenses	1,293.13
			Total Current Work	1,293.13
			Balance Now Due	$1,293.13