

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Case No: 6:21-cv-694-CEM-DCI

HARBOR CITY CAPITAL CORP., et al.,

Defendants,

and

CELTIC ENTERPRISES, LLC and
TONYA L. MARONEY

Relief Defendants.

**RECEIVER'S UNOPPOSED SIXTH QUARTERLY FEE
APPLICATION FOR ORDER AWARDING FEES AND
REIMBURSEMENT OF COSTS TO RECEIVER
AND HER PROFESSIONALS**

Katherine C. Donlon, the Court-appointed Receiver over the corporate Defendants and Relief Defendant Celtic Enterprises, LLC (the “**Receiver**” and the “**Receivership**” or “**Receivership Estate**”) pursuant to the Court’s Order dated November 8, 2021 (Doc. 75) (the “**Order Appointing Receiver**”), respectfully submits this Sixth Quarterly Fee Application to the Court for the entry of an order awarding fees and the

reimbursement of costs to the Receiver and her professionals. This Application covers all fees and costs incurred from January 1, 2023 through March 31, 2023. Attached as **Exhibit 1** is the Receiver's Fund Accounting Report.¹

During the time covered by this Motion, among other things, the Receiver and her counsel have done the following:

- As it relates to the most significant asset of the Receivership, 143 Lansing Island Drive, the following occurred:
 - Continued efforts to resolve the ongoing issues relating to the pending foreclosure of the 143 Lansing Island Drive property, including efforts to resolve the demand for attorney's fees and interest asserted by the foreclosure attorneys in an effort to move forward with respect to sale of property;
 - Drafted and filed an Opposition to the Emergency Motion for Extension of Time to Respond to Receiver's Motion to Determine Interest and Fees and attend hearing on same;
 - Drafted and filed a Motion for Clarification and Other Relief as to Court Order;
 - Drafted and filed a reply to Benworth's response to Order to Show Cause;
 - Drafted and filed an Emergency Motion for Clarification and Other Relief.

¹ The Securities and Exchange Commission ("SEC" or the "**Commission**") provided the Receiver with detailed Billing Instructions for Receivers in Civil Actions Commenced by the Commission (the "**Billing Instructions**"). The Accounting Report is one of the requirements contained in the Billing Instructions.

- Communicate with title agent regarding satisfaction of liens;
- In April 2023, mediated with Benworth and reached an agreement regarding the sale of the Property. The sale of the Property closed on April 28, 2023.
- Fielded calls/inquiries regarding former Harbor City employee George Santos and investigated same;
- Review of bank statements and indexing of transfers between accounts;
- Issued subpoenas to Ring Central, Slack Technologies, and Microsoft Corporation and review objections to same;
- Continued to field telephone calls and emails from investors and maintained the Receiver's website www.harborcityreceivership.com

Case Background and Status

As of the date of filing this Application, the Court has appointed Katherine C. Donlon as Receiver over the assets of the following entities:

- (1) Defendants Harbor City Capital Corp., Harbor City Ventures, LLC, HCCF-1, LLC, HCCF-2, LLC, HCCF-3, LLC, HCCF-4, LLC, HCCF-5, LLC, Harbor City Digital Ventures, Inc., and HCC Media Funding, LLC (“collectively “**Harbor City defendants**” or the “**defendants**”); and
- (2) Relief defendant Celtic Enterprises, LLC (“**Celtic**” or “**relief defendant**”).

The foregoing corporate defendants and relief defendant are referred to as the “**Receivership Entities.**”

On May 1, 2023, the Receiver filed her Sixth Quarterly Status Report (Doc. 152) (the “**Quarterly Status Report**”), which contains information

regarding the case background and status; the recovery of assets; financial information about Receivership Entities; the Receiver's proposed course of action regarding assets in the Receivership Estate; the potential establishment of a claims process; and related (and/or contemplated) litigation involving Receivership Entities. The Quarterly Status Report addresses all activity that resulted in the fees and costs sought in this motion.

Professional Services Rendered and Costs Incurred

The Order Appointing Receiver authorizes the Receiver to “solicit persons and entities (‘Retained Personnel’) to assist her in carrying out the duties and responsibilities described in this Order” and states that the “Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates,” subject to approval by the Court. *See* Doc. 72-1 ¶55. The Order Appointing Receiver also specifically authorized the Receiver to retain Nicole D. Newlon of Johnson, Newlon & DeCort, P.A. (“**JND**”) to provide legal services. *See* Doc. 72-1 ¶2. The Order Appointing Receiver requires that the Receiver obtain the Court’s authorization of the retention of any Retained Personnel, other than counsel mentioned. *See* Doc. 72-1 ¶ 54. The Receiver has previously filed five Quarterly Fee Applications on January 31, 2022 (Doc 82), May 24,

2022 (Doc. 89), August 15, 2022 (Doc. 106), November 14, 2022 (Doc. 123), and February 16, 2023 (Doc. 143). The Court approved these fee applications on May 26, 2022 (Doc. 92), August 25, 2022 (Doc. 107), October 25, 2022 (Doc 119), January 13, 2023 (Doc. 135), and May 4, 2023 (Doc. 154)(Report and Recommendation awaiting approval).

As shown in the Quarterly Status Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and recover assets, and analyze records to determine potential litigation. These services are for the benefit of aggrieved investors, creditors, and other interested parties.

I. The Receiver.

The Receiver requests the Court award her fees for the professional services rendered from January 1, 2023 through March 31, 2023, in the amount of \$12,810.00. The standard hourly rate the Receiver charges clients in private litigation is \$425. However, the Receiver agreed, for purposes of her appointment as the Receiver, that her hourly rate would be reduced to \$350, representing nearly an eighteen percent discount off the standard hourly rate which she charges clients in comparable matters. This

rate was set forth in the Receiver's submission to the SEC. *See* Doc. 60, Ex. 1.

The Receiver commenced services upon her appointment. The Receiver has billed his time for these activities in accordance with the Billing Instructions, which request that this motion contain a narrative of each "business enterprise or litigation matter" for which outside professionals have been employed. The Billing Instructions identify each such business enterprise or litigation matter as a separate "project." Further, the Billing Instructions request that time billed for each project be allocated to one of several Activity Categories.² At this early stage of the

² The Activity Categories set forth by the Commission in the Billing Instructions are as follows: (1) Asset Analysis and Recovery, which is defined as identification and review of potential assets including causes of action and non-litigation recoveries; (2) Asset Disposition, which is defined as sales, leases, abandonment and related transaction work (where extended series of sales or other disposition of assets is contemplated, the Billing Instructions provide that a separate category should be established for each major transaction); (3) Business Operations, which is defined as issues related to operation of an ongoing business; (4) Case Administration, which is defined as coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.; (5) Claims Administration and Objections, which is defined as expenses in formulating, gaining approval of and administering any claims procedure; and (6) Employee Benefits/Pensions, which is defined as review issues such as severance, retention, 401K coverage and continuance of pension plan. The Billing Instructions provide that time spent preparing motions for fees may not be charged to the Receivership Estate. In accordance with these instructions, the Receiver created an additional Activity Category for work on fees motions and has accounted for time spent on such work but has not charged any amount for that work.

Receivership, no separate matters have been commenced to warrant billing as a separate project.

For the time covered by this motion, the work of the Receiver and JND focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and analyzing investor information for an eventual claims process and possible litigation. These activities of the Receiver are set forth in detail in the Quarterly Status Report. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as **Exhibit 2**. The Receiver's time and fees for services rendered for each Activity Category from January 1, 2023 through March 31, 2023, are as follows:

Receivership
Receiver's Time and Fees for Services Rendered

Activity Category	Hours Expended	Fee Amount
Asset Analysis and Recovery	13.2	\$4,620.00
Asset Disposition	20.4	\$7,140.00
Business Operations	.9	\$315.00
Case Administration	2.1	\$735.00
TOTAL	36.6	\$12,810.00

II. Johnson, Newlon & DeCort P.A. (“JND”)

The Receiver requests the Court award JND fees for professional services rendered and costs incurred from January 1, 2023 through March 31, in the amounts of \$20,841.50 and \$9,358.50, respectively. A categorization and summary of all fees and costs for which JND seeks reimbursement is attached as Exhibit 3.

As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, JND’s attorneys and paralegals have agreed to reduce their standard rates as provided in the fee schedule attached as Exhibit 4. JND began providing services upon the appointment of the Receiver. The activities of JND for the time covered by this motion are set forth in the Quarterly Status Report. JND has billed time for these activities in accordance with the Billing Instructions. As discussed above, at this stage of the Receivership, the work of the Receiver and JND is focused on continuing their investigation of the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing assets for the Receivership, and analyzing investor information for the eventual claims process and possible litigation. JND’s time and fees for services rendered on this matter for each Activity Category are as follows:

Receivership
JND's Time and Fees for Services Rendered

Activity Category	Hours Expended	Fee Amount
Asset Analysis and Recovery	8.5	\$2,275.00
Asset Disposition	51.0	\$16,241.50
Case	6.1	\$2,115.00
Business Operations	1.4	\$210.00
Total	67.0	\$20,841.50

A summary of the professionals' hours rendered during the time covered by this Motion is set forth below.

Professional	Position	Yrs. Exp.	Billed Hours	Rate	Total
Nicole D. Newlon (NDN)	Partner	18	52	\$350.00	\$18,200.00
Alison Bowlby (AB)	Associate	1	8.7	\$195.00	\$1,696.50.00
Michelle Patel (MBP)	Paralegal	18	6.3	\$150.00	\$945.00
Fees			50.5		\$20,841.50
Disbursements					\$9,358.50
Total					\$30,200.00

In addition to these legal fees, JND advanced costs of \$9,358.50 as summarized below. Much of the expenses are related to the utilities and upkeep on 143 Lansing Drive.

Costs	Total
Utilities/Upkeep for 143 Lansing Island Drive	\$6,467.14
E-Hounds Platform Fees	\$1,785.00
K-Tek Website Fees	\$600.00
Wire Fee	\$15,00
Process Server	\$300.00
Overnight Deliveries	\$191.36
Total	\$9,358.50

MEMORANDUM OF LAW

It is well settled that this Court has the power to appoint a receiver and to award the receiver and those appointed by her fees and costs for their services. *See, e.g., S.E.C. v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties); *Donovan v. Robbins*, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) (“[T]he receiver diligently and successfully discharged the responsibilities placed upon him by the Court and is entitled to reasonable compensation for his efforts.”); *S.E.C. v. Custable*, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); *S.E.C. v. Mobley*, 1317RCC, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 2000) (court awarded reasonable fees for the receiver and his professionals); *see also* Doc. 11 ¶ 16. The determination of fees to be awarded is largely within the discretion of the trial court. *See Monaghan v. Hill*, 140 F.2d 31, 34 (9th

Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and her Professionals, the Court should consider the circumstances surrounding the Receivership. *See Elliot*, 953 F.2d at 1577.

In determining the reasonableness of fees, the Court must calculate the lodestar, which is the “number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). This is in part based on the nature and extent of the services rendered and the value of those services. *See Grant v. George Schumann Tire & Battery Co.*, 908 F.2d 874, 877-78 (11th Cir. 1990) (bankruptcy fee award case addressing the issue of attorney’s fees generally before considering specific requirements in the bankruptcy context). Additionally, the Court should consider the twelve factors set forth in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974), a case involving an award of attorneys’ fees under federal civil rights statutes, as incorporated by the Eleventh Circuit in *Grant*, a bankruptcy case, are as follows: (1) the time and labor required; (2) the novelty and difficulty of the questions presented; (3) the skill required to perform the legal services properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee for similar work in the

community; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or by the circumstances; (8) the amount involved and results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. Based on the information provided herein as well as the Receiver's First Quarterly Status Report, the Receiver believes that the Court when considering these factors and the work accomplished during this quarter of the Receivership will determine that the Receiver's motion for fees is reasonable and should be granted.

A receiver and the team she assembles is entitled to reasonable compensation and courts have looked at several factors in determining reasonableness: (1) the results achieved by the receiver; (2) the ability, reputation and other professional qualities of the receiver; (3) the size of the estate and its ability to afford the expenses and fees; and (4) the time required to conclude the receivership. *SEC v. W.L. Moody & Co*, 374 F. Supp. 465, 480-484 (S.D. Tex. 1974). In this case, the Receiver and her counsel have continued investigating, locating, preserving and/or liquidating assets for the benefit of defrauded investors. Additionally, the

Receiver has kept in communication with the defrauded investors and various regulators investigating the fraud.

Here, because of the nature of this case, it is necessary for the Receiver to employ attorneys experienced and familiar with financial frauds, federal receiverships, securities, banking, and finance. Further, to perform the services required and achieve the results obtained to date, the skills and experience of the Receiver and the Professionals in the areas of fraud, securities, computer and accounting forensics, and financial transactions are indispensable.

As discussed above, the Receiver and JND have discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the attorneys and paralegals are at or below those charged by attorneys and paralegals of comparable skill from other law firms in the Middle District of Florida.

While the Receiver is sensitive to the need to conserve the Receivership Entities' assets, she believes the fees and costs expended to date are reasonable, necessary, and benefited the Receivership. Notably, the Commission has no objection to the relief sought in this motion. *Custable*, 1995 WL 117935 at *7 (“In securities law receiverships, the

position of the SEC in regard to the awarding of fees will be given great weight.”).

CONCLUSION

Under the Order Appointing Receiver, the Receiver, among other things, is authorized and empowered to engage professionals to assist her in carrying out her duties and obligations. The Order Appointing Receiver further provides that she apply to the Court for authority to pay herself and her Professionals for services rendered and costs incurred. In exercising her duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interests of the Receivership.

WHEREFORE, Katherine C. Donlon, the Court-appointed Receiver, respectfully requests that this Court award the following sums and direct that payment be made from the Receivership assets:

Katherine C. Donlon, Receiver	\$12,810.00
Johnson, Newlon & DeCort	\$30,200.00

LOCAL RULE 3.01(g) CERTIFICATION

Undersigned counsel for the Receiver has conferred with defendant counsel for the SEC and is authorized to represent to the Court that the SEC does not object to the relief requested in this motion.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on May 16, 2023, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court through the CM/ECF system, which served counsel of record.

/s/ Nicole D. Newlon

NICOLE D. NEWLON (FBN: 832391)

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Secondary: kdonlon@jclaw.com;

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Counsel for Receiver Katherine Donlon

RECEIVER'S CERTIFICATION

The Receiver has reviewed this Sixth Quarterly Fee Application for Order Awarding Fees, Costs, and Reimbursement of Costs to Receiver and Her Professionals (the "**Application**").

To the best of the Receiver's knowledge, information, and belief formed after reasonable inquiry, the Application and all fees and expenses herein are true and accurate and comply with the Billing Instructions provided to the Receiver by the Securities and Exchange Commission.

All fees contained in the Application are based on the rates listed in the fee schedule, attached as Exhibit 4. Such fees are reasonable, necessary,

and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

The Receiver has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth in the Billing Instructions for photocopies and facsimile transmission).

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Application were incurred in the best interests of the Receivership Estate. With the exception of the Billing Instructions and the Court-approved engagements described above, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity

concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

s/ Katherine C. Donlon
Katherine C. Donlon

EXHIBIT 1



Oldsmar / Tampa / St. Petersburg

727-785-4447

813-498-1294

727-784-5491 Fax

www.pdr-cpa.com

REPORT OF STANDARDIZED FUND ACCOUNTING REPORT

Katherine C Donlon As Receiver for
Harbor City Capital Corp, et. al.
Tampa, FL

We have compiled the standardized fund accounting report for the period of January 1, 2023 to March 31, 2023 and from inception to March 31, 2023, included in the accompanying prescribed form (Civil Court Docket No 6:21-cv-694-CEM-DCI). We have not audited or reviewed the accompanying standardized fund accounting report and accordingly, do not express an opinion or any assurance about whether the standardized fund accounting report is in accordance with the form prescribed by the Civil Court Docket No. (6:21-cv-694-CEM-DCI)

Consolidated Harbor City Capital Corp, et al Receivership is responsible for the preparation and fair presentation of the standardized fund account report in accordance with requirements prescribed by the Civil Court Docket No 6:21-cv-694-CEM-DCI and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the standardized fund accounting report.

Our responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist consolidated Harbor City Capital Corp, et al Receivership in presenting financial information in the form of a standardized fund accounting report without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the standardized fund accounting report.

This standardized fund accounting report is presented in accordance with the requirements of the Civil Court Docket No. 6:21-cv-694-CEM-DCI, which differ from accounting principles generally accepted in the United States of America. This report is intended solely for the information and use of the Civil Court Docket No 6:21-cv-694-CEM-DCI and is not intended and should not be used by anyone other than this specified party.

Oldsmar, Florida
April 28, 2023

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period 01/01/2023 to 03/31/2023

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 01/01/2023):			,939.61
	Increases in Fund Balance:			
Line 2	Business Income			
Line 3	Cash and Securities			
Line 4	Interest Dividend Income			
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation			
Line 7	Third-Party Litigation Income			
Line 8	Miscellaneous - Other			
	Total Funds Available (Line 1 - 8):		-	,939.61
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals			
Line 10b	Business Asset Expenses	3.4		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses	-		
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		3.4	3.4
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 Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses			
Line 11b	Distribution Plan Implementation Expenses:			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	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)			3.4
Line 13	Ending Balance (As of 03/31/2023)			,886.16

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period 01/01/2023 to 03/31/2023

FUND ACCOUNTING (See Instructions):	Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:		
Line 14a	Cash Cash Equivalents		,886.16
Line 14b	Investments		
Line 14c	Other Assets or Uncleared Funds		
	Total Ending Balance of Fund - Net Assets		,886.16
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 1 a	Plan Development Expenses Not Paid by the Fund		
	1. Fees:		
	Fund Administrator		
	IDC		
	Distribution Agent		
	Consultants		
	Legal Advisors		
	Tax Advisors		
	2. Administrative Expenses		
	3. Miscellaneous		
	Total Plan Development Expenses Not Paid by the Fund	-	
Line 1 b	Plan Implementation Expenses Not Paid by the Fund		
	1. Fees:		
	Fund Administrator		
	IDC		
	Distribution Agent		
	Consultants		
	Legal Advisors		
	Tax Advisors		
	2. Administrative Expenses		
	3. Investor Identification:		
	Notice Publishing Approved Plan		
	Claimant Identification		
	Claims Processing		
	Web Site Maintenance Call Center		
	4. Fund Administrator and		
	Miscellaneous		
	6. Federal Account for Investor Restitution		
	(FAIR) Reporting Expenses		
	Total Plan Implementation Expenses Not Paid by the Fund	-	
Line 1 c	Tax Administrator Fees and 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		
	of Claims Received This Reporting Period		
	of Claims Received Since Inception of Fund		
Line 19	No of Claimants/Investors:		
Line 19a	of Claimants Investors Paid This Reporting Period		
	of Claimants Investors Paid Since Inception of Fund		

Receiver:

 Title
 Date

Standardized Fund Accounting Report for
Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
Reporting Period Since Inception to 03/31/2023

FUND ACCOUNTING (See Instructions):	Detail	Subtotal	Grand Total
Line 1	Beginning Balance (as of 11/1/2022)		-
	Increases in Fund Balance:		
Line 2	Business Income	-	
Line 3	Cash and Securities	1,944,291	
Line 4	Interest Dividend Income		
Line 5	Business Asset Liquidation		
Line 6	Personal Asset Liquidation		
Line 7	Third-Party Litigation Income		
Line 8	Miscellaneous - Other		
	Total Funds Available (Line 1 - 8):	1,944,291	1,944,291
	Decreases in Fund Balance:		
Line 9	Disbursements to Investors		
Line 10	Disbursements for Receivership Operations		
Line 10a	Disbursements to Receiver or Other Professionals	9,801.8	
Line 10b	Business Asset Expenses	3,490	
Line 10c	Personal Asset Expenses		
Line 10d	Investment Expenses		
Line 10e	Third-Party Litigation Expenses		
	1. Attorney Fees		
	2. Litigation Expenses		
	Total Third-Party Litigation Expenses	-	
Line 10f	Tax Administrator Fees and Bonds		
Line 10g	Federal and State Tax Payments		
	Total Disbursements for Receivership Operations	13,691.8	13,691.8
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 Advisors		
	Tax Advisors		
	2. Administrative Expenses		
	3. Miscellaneous		
	Total Plan Development Expenses		
Line 11b	Distribution Plan Implementation Expenses:		
	1. Fees:		
	Fund Administrator		
	IDC		
	Distribution Agent		
	Consultants		
	Legal Advisors		
	Tax Advisors		
	2. Administrative Expenses		
	3. Investor Identification:		
	Notice Publishing Approved Plan		
	Claimant Identification		
	Claims Processing		
	Web Site Maintenance Call Center		
	4. Fund Administrator Bond		
	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)		13,691.8
Line 13	Ending Balance (As of 03/31/2023)		,886.16

**Standardized Fund Accounting Report for
 Katherine C Donlon as Receiver for Harbor City Capital Corp et al. - Cash Basis
 Receivership; Civil Court Case No: 6:21-cv-694-CEM-DCI
 Reporting Period Since Inception to 03/31/2023**

FUND ACCOUNTIN (See Instructions):		Detail	Subtotal	Grand Total
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash Cash Equivalents			,886.16
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			,886.16
OTHER SUPPLEMENTAL INFORMATION:		Detail	Subtotal	Grand Total
Report of Items Not To Be Paid by the Fund				
Line 15	Disbursements for Plan Administration Expenses Not Paid by the Fund:			
Line 1 a	Plan Development Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses Not Paid by the Fund		-	
Line 1 b	Plan Implementation Expenses Not Paid by the Fund			
	1. Fees:			
	Fund Administrator			
	IDC			
	Distribution Agent			
	Consultants			
	Legal Advisors			
	Tax Advisors			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance Call Center			
	4. Fund Administrator ond			
	. Miscellaneous			
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 1 c	Tax Administrator Fees onds 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			
	of Claims Received This Reporting Period			
	of Claims Received Since Inception of Fund			
Line 19	No of Claimants/Investors:			
Line 19a	of Claimants Investors Paid This Reporting Period			
	of Claimants Investors Paid Since Inception of Fund			

Receiver:
 y:
 Title
 Date

EXHIBIT 2



INVOICE

Invoice # 6990
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00007-Harbor City - Receiver - AAR (Asset Analysis and Recovery)

Harbor City - Receiver - AAR (Asset Analysis and Recovery)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/06/2023	Emails with I. Stanley-Becker (.2)	KD	0.20	\$350.00	\$70.00
Service	01/09/2023	Emails with A. Klausner regarding Nations Best (.2); initial review of bank statements (.2).	KD	0.40	\$350.00	\$140.00
Service	01/10/2023	Telephone call with I. Stanley-Becker (.2); confer with N. Newlon regarding same (.1); review and revise Liquidation Plan (.4).	KD	0.70	\$350.00	\$245.00
Service	01/11/2023	Telephone call and emails with I. Stanley-Becker (.3).	KD	0.30	\$350.00	\$105.00
Service	01/12/2023	Review Harbor City records regarding timeline for G. Santos (3.1); respond to media requests (.4); emails with B. Tau and A. Kaczynski (.3); telephone call and emails with I. Stanley-Becker (.3).	KD	4.10	\$350.00	\$1,435.00
Service	01/13/2023	Communicate with A. Johnson regarding outstanding issues (.5); continue review of E-Hounds platform regarding same (.7).	KD	1.20	\$350.00	\$420.00
Service	01/15/2023	Emails with C. Hallowell (.1).	KD	0.10	\$350.00	\$35.00
Service	01/16/2023	Emails with A. Johnson regarding payroll payments (.2).	KD	0.20	\$350.00	\$70.00
Service	01/17/2023	Emails with I. Stanley-Becker (.2); review Washington Post stories (.2); review payroll records (.6); confer with A. Johnson (.8).	KD	1.80	\$350.00	\$630.00

Invoice # 6990 - 05/15/2023

Service	01/18/2023	Telephone call and emails with A. Johnson (.4); continue review of Google records (.6).	KD	1.00	\$350.00	\$350.00
Service	01/19/2023	Telephone call and emails with M. Gold (.2); emails with I. Stanley-Becker (.1).	KD	0.30	\$350.00	\$105.00
Service	01/24/2023	Emails with A. Johnson and N. Newlon regarding Qualcan investment (.2).	KD	0.20	\$350.00	\$70.00
Service	01/25/2023	Emails with A. Johnson regarding Washington Post story (.2); review Harbor City email records (.4).	KD	0.60	\$350.00	\$210.00
Service	01/26/2023	Continue review of Harbor City email records (.6).	KD	0.60	\$350.00	\$210.00
Service	02/02/2023	Confer with N. Newlon and M. Patel regarding obtaining documents from Slack and other third-party accounts (.2)	KD	0.20	\$350.00	\$70.00
Service	02/08/2023	Emails with A. Johnson regarding subpoenas (.1)	KD	0.10	\$350.00	\$35.00
Service	03/08/2023	Confer with N. Newlon regarding subpoenas (.2).	KD	0.20	\$350.00	\$70.00
Service	03/13/2023	Emails with L. McDonough (.2).	KD	0.20	\$350.00	\$70.00
Service	03/15/2023	Communicate with L. McDonough (.5).	KD	0.50	\$350.00	\$175.00
Service	03/28/2023	Communicate with A. Johnson and N. Newlon regarding subpoenas (.3).	KD	0.30	\$350.00	\$105.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	13.2	\$350.00	\$4,620.00
		Subtotal	\$4,620.00
		Total	\$4,620.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6722	02/14/2023	\$1,715.00	\$0.00	\$1,715.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6990	05/15/2023	\$4,620.00	\$0.00	\$4,620.00
Outstanding Balance				\$6,335.00
Total Amount Outstanding				\$6,335.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.



INVOICE

Invoice # 6991
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00008-Harbor City - Receiver - (ASDIS - Asset Disposition)

Harbor City - Receiver - (ASDIS - Asset Disposition)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/03/2023	Confer with N. Newlon regarding Benworth's request for extension (.1).	KD	0.10	\$350.00	\$35.00
Service	01/04/2023	Review Benworth's Emergency Motion for Extension (.2); review and revise Opposition to Motion for Extension (.3); confer with N. Newlon regarding same (.2); review Court's order setting hearing on motion (.1).	KD	0.80	\$350.00	\$280.00
Service	01/05/2023	Confer with N. Newlon regarding hearing on emergency motion for extension to respond to motion to determine interest and fees (.3).	KD	0.30	\$350.00	\$105.00
Service	01/10/2023	Execute agreement to extend closing date (.1); confer with G. Baum regarding same (.1); review Benworth's opposition to motion to determine interest (.2).	KD	0.40	\$350.00	\$140.00
Service	01/11/2023	Review and revise appellate brief (.5).	KD	0.50	\$350.00	\$175.00
Service	01/18/2023	Email to J. Maroney regarding Mercedes (.1).	KD	0.10	\$350.00	\$35.00
Service	01/30/2023	Telephone call to G. Baum regarding closing date (.1); review Court's Order to Show Cause regarding Benworth (.3); confer with N. Newlon regarding same (.2).	KD	0.60	\$350.00	\$210.00
Service	01/31/2023	Telephone call to G. Baum regarding Order to Show Cause (.2); communicate with N. Nicole and title company regarding Order to	KD	0.50	\$350.00	\$175.00

		Show Cause and requirements for closing (.3).				
Service	02/01/2023	Review and revise motion for clarification regarding closing on house (.4); confer with N. Newlon regarding same (.3).	KD	0.70	\$350.00	\$245.00
Service	02/08/2023	Emails with S. Toth and M. Patel regarding deposit for 143 Lansing Island (.2); confer with N. Newlon regarding communications with H. Alvarez (.2).	KD	0.40	\$350.00	\$140.00
Service	02/10/2023	Emails and telephone call with G. Baum regarding status update on closing (.2).	KD	0.20	\$350.00	\$70.00
Service	02/14/2023	Review Benworth's Response to Court's Order to Show Cause (.3); telephone call with G. Baum regarding extension of closing date (.2).	KD	0.50	\$350.00	\$175.00
Service	02/15/2023	Review Benworth's Opposition to Motion for Clarification (.3); review and execute paperwork to extend closing date and listing agreement (.2); review and revise Receiver's Reply to Benworth's Opposition to Order to Show Cause (.5); confer with N. Newlon regarding filings (.2); emails with G. Zimmerman regarding closing documents (.2).	KD	1.40	\$350.00	\$490.00
Service	02/16/2023	Review Benworth's Amended Response (.3); confer with N. Newlon regarding same, propose interim resolution, possible motion to strike, and communications with Benworth counsel (.6).	KD	0.90	\$350.00	\$315.00
Service	02/17/2023	Telephone call with G. Baum regarding offer on house (.2)	KD	0.20	\$350.00	\$70.00
Service	02/18/2023	Confer with G. Baum regarding new offer on house (.2).	KD	0.20	\$350.00	\$70.00
Service	02/20/2023	Confer with N. Newlon regarding house offer (.1).	KD	0.10	\$350.00	\$35.00
Service	02/23/2023	Telephone call with lender underwriter regarding 143 Lansing Island (.1); telephone call with G. Baum regarding status of discussions with mortgage holder and closing (.2); telephone call with H. Alvarez regarding efforts to escrow funds in dispute (.3).	KD	0.60	\$350.00	\$210.00
Service	02/24/2023	Telephone call with H. Alvarez regarding escrow (.2); confer with N. Newlon regarding closing (.2).	KD	0.40	\$350.00	\$140.00
Service	02/27/2023	Telephone call with G. Baum regarding	KD	0.20	\$350.00	\$70.00

		closing (.2).				
Service	02/28/2023	Telephone call with F. Fawcett, Real Title, regarding closing (.3); emails with F. Fawcett regarding payoffs (.2); confer with N. Newlon regarding proposal to Benworth for closing (.3).	KD	0.80	\$350.00	\$280.00
Service	03/02/2023	Telephone call with F. Fawcett (.2); draft letter to F. Fawcett proposing closing with escrow (.3); emails with F. Fawcett regarding acceptance by underwriter (.2); communicate with counsel for Benworth regarding proposal (.2); confer with N. Newlon regarding same (.2); review pre-HUD (.2); telephone call to mortgage lender regarding closing issues (.2).	KD	1.50	\$350.00	\$525.00
Service	03/02/2023	Emails with F. Fawcett regarding efforts to resolve issues with Benworth (.2).	KD	0.20	\$350.00	\$70.00
Service	03/06/2023	Telephone call with G. Baum regarding water (.2); emails with M. Patel regarding same (.1); emails with F. Fawcett regarding status update (.1).	KD	0.40	\$350.00	\$140.00
Service	03/07/2023	Telephone call with F. Fawcett (.1); forward payoffs to F. Fawcett (.1).	KD	0.20	\$350.00	\$70.00
Service	03/08/2023	Initial review of conditional payoff and settlement offer from counsel for Benworth (.2).	KD	0.20	\$350.00	\$70.00
Service	03/09/2023	Confer with G. Baum regarding closing extension (.2).	KD	0.20	\$350.00	\$70.00
Service	03/10/2023	Telephone call with A. Johnson regarding status update (.2).	KD	0.20	\$350.00	\$70.00
Service	03/10/2023	Telephone call with G. Baum (.2); telephone call with F. Fawcett (.1); telephone call with H. Alvarez (.3); telephone call with S. Leventhal (.2).	KD	0.80	\$350.00	\$280.00
Service	03/13/2023	Research regarding obligations to pay default interest (.9); draft Emergency Amended Motion for Clarification (2.6); confer with N. Newlon and S. Johnson regarding same (.4); telephone call with F. Fawcett regarding status update (.1); email to opposing counsel on 3.01 conferral (.1); emails with H. Alvarez (.2).	KD	4.50	\$350.00	\$1,575.00
Service	03/14/2023	Confer with A. Bowlby regarding research projects related to closing (.2); email to F. Fawcett regarding status update (.1).	KD	0.30	\$350.00	\$105.00
Service	03/15/2023	Review Benworth's opposition to Motion for	KD	0.80	\$350.00	\$280.00

		Clarification (.3); confer with N. Newlon regarding same (.2); draft communication to opposing counsel regarding same (.2); email to J. Maroney regarding Mercedes (.1).				
Service	03/16/2023	Telephone call with S. Leventhal (.2); review response from A. Read (.1); confer with N. Newlon regarding same (.3); review research from A. Bowlby (.2).	KD	0.80	\$350.00	\$280.00
Service	03/20/2023	Telephone call with F. Fawcett (.1); telephone call with G. Baum (.1).	KD	0.20	\$350.00	\$70.00
Service	03/28/2023	Confer with N. Newlon regarding buyer's deposit and contract language regarding same (.2).	KD	0.20	\$350.00	\$70.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	20.4	\$350.00	\$7,140.00
		Subtotal	\$7,140.00
		Total	\$7,140.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6723	02/14/2023	\$3,115.00	\$0.00	\$3,115.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6991	05/15/2023	\$7,140.00	\$0.00	\$7,140.00
			Outstanding Balance	\$10,255.00
			Total Amount Outstanding	\$10,255.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6991
Date: 05/15/2023



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INVOICE

Invoice # 6992
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00009-Harbor City - Receiver - (CASE - Case Administration)

Harbor City - Receiver - (CASE - Case Administration)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/12/2023	Email to investor TR (.1).	KD	0.10	\$350.00	\$35.00
Service	01/13/2023	Review Court's order on fees (.1); update website with pleadings (.2).	KD	0.30	\$350.00	\$105.00
Service	01/30/2023	Review bank statements and forward to PDR for fund accounting (.2).	KD	0.20	\$350.00	\$70.00
Service	02/01/2023	Review and revise quarterly status report (.5); confer with N. Newlon regarding same (.2); review fund accounting (.2).	KD	0.90	\$350.00	\$315.00
Service	02/17/2023	Telephone call with investor EL (.1).	KD	0.10	\$350.00	\$35.00
Service	03/15/2023	Update receivership website (.2).	KD	0.20	\$350.00	\$70.00
Service	03/23/2023	Telephone calls to investors (DB, LJ, SH and KT) (.3).	KD	0.30	\$350.00	\$105.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	2.1	\$350.00	\$735.00
Subtotal			\$735.00
Total			\$735.00

Detailed Statement of Account**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6724	02/14/2023	\$1,575.00	\$0.00	\$1,575.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6992	05/15/2023	\$735.00	\$0.00	\$735.00
Outstanding Balance				\$2,310.00
Total Amount Outstanding				\$2,310.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6992
Date: 05/15/2023



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INVOICE

Invoice # 6993
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00010-Harbor City - Receiver - (BUSIN- Business Operations)

Harbor City - Receiver - (BUSIN- Business Operations)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/14/2023	Attend to house expenses (.1).	KD	0.10	\$350.00	\$35.00
Service	01/20/2023	Attend to house expenses (.1).	KD	0.10	\$350.00	\$35.00
Service	02/10/2023	Attend to house expenses (.1).	KD	0.10	\$350.00	\$35.00
Service	02/14/2023	Confer with M. Patel regarding dumpster on property (.2).	KD	0.20	\$350.00	\$70.00
Service	02/15/2023	Confer with M. Patel regarding dumpster (.1).	KD	0.10	\$350.00	\$35.00
Service	03/06/2023	Confer with M. Patel regarding utilities issue on house (.1).	KD	0.10	\$350.00	\$35.00
Service	03/23/2023	Attend to payment of Micro-Clean invoice (.2).	KD	0.20	\$350.00	\$70.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	0.9	\$350.00	\$315.00
Subtotal			\$315.00
Total			\$315.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6725	02/14/2023	\$70.00	\$0.00	\$70.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6993	05/15/2023	\$315.00	\$0.00	\$315.00
Outstanding Balance				\$385.00
Total Amount Outstanding				\$385.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6993
Date: 05/15/2023



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INVOICE

Invoice # 6994
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00011-Harbor City - Receiver (WFEE Work on Fees Motion)

Harbor City - Receiver (WFEE Work on Fees Motion)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	02/14/2023	Draft motion for fees and circulate same to A. Johnson (2.1).	KD	2.10	\$350.00	\$735.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	2.1	\$350.00	\$735.00
Subtotal			\$735.00
Total			\$735.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6994	05/15/2023	\$735.00	\$0.00	\$735.00
Outstanding Balance				\$735.00
Total Amount Outstanding				\$735.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6994
Date: 05/15/2023



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EXHIBIT 3



INVOICE

Invoice # 6989
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00003-Harbor City - Legal Team - CASE (Case Administration)

Harbor City - Legal Team - CASE (Case Administration)

Services

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/09/2023	Draft Liquidation Plan.	NDN	2.90	\$350.00	\$1,015.00
Service	01/10/2023	Finalize liquidation plan and file (.3).	NDN	0.30	\$350.00	\$105.00
Service	01/30/2023	Draft Fifth Quarterly Status Report (1.9).	NDN	1.90	\$350.00	\$665.00
Service	02/01/2023	Edit Fifth Quarterly Status Report.	NDN	0.90	\$350.00	\$315.00
Service	02/15/2023	Work with Receiver on review of expenses for quarterly report (.1).	MBP	0.10	\$150.00	\$15.00
Services Subtotal						\$2,115.00

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	01/18/2023	Website expenses paid to KTEK Systems, Inc.	1.00	\$600.00	\$600.00
Expense	02/07/2023	E-Hounds Inv. 41831 (January)	1.00	\$595.00	\$595.00
Expense	02/09/2023	Wire fee incurred on incoming deposit received 7/26/22.	1.00	\$15.00	\$15.00
Expense	02/28/2023	E-Hounds Inv. 42612 - February 2023	1.00	\$595.00	\$595.00
Expense	03/31/2023	E-Hounds Inv. 43140 - March 2023	1.00	\$595.00	\$595.00

Expenses Subtotal \$2,400.00

Time Keeper	Quantity	Rate	Total
Nicole D. Newlon	6.0	\$350.00	\$2,100.00
Michelle B. Patel	0.1	\$150.00	\$15.00
Subtotal			\$4,515.00
Total			\$4,515.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6721	02/14/2023	\$1,507.00	\$0.00	\$1,507.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6989	05/15/2023	\$4,515.00	\$0.00	\$4,515.00
Outstanding Balance				\$6,022.00
Total Amount Outstanding				\$6,022.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6989
Date: 05/15/2023



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INVOICE

Invoice # 6995
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00004-Harbor City - Legal Team - BUSIN (Business Operations)

Harbor City - Legal Team - BUSIN (Business Operations)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	02/14/2023	Correspondence regarding dumpster on property.	MBP	0.60	\$150.00	\$90.00
Service	02/15/2023	Attention to dumpster issues (.1).	MBP	0.10	\$150.00	\$15.00
Service	02/17/2023	Payment of utilities for Lansing Island property; follow up call with RedBox+ regarding dumpster and negotiate price; confer with Receiver regarding same.	MBP	0.30	\$150.00	\$45.00
Service	03/06/2023	Call to City of Melbourne regarding water at property.	MBP	0.40	\$150.00	\$60.00

Time Keeper	Quantity	Rate	Total
Michelle B. Patel	1.4	\$150.00	\$210.00
Subtotal			\$210.00
Total			\$210.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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6995	05/15/2023	\$210.00	\$0.00	\$210.00	
				Outstanding Balance	\$210.00
				Total Amount Outstanding	\$210.00

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6995
Date: 05/15/2023



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INVOICE

Invoice # 6996
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00001-Harbor City - Legal Team - (AAR - Asset Analysis and Recovery)

Harbor City - Legal Team - (AAR - Asset Analysis and Recovery)

Services

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/10/2023	Review emails from Receiver and reporters regarding G. Santos.	NDN	0.20	\$350.00	\$70.00
Service	01/13/2023	Review additional messages from reporters regarding Santos and forward same to Receiver.	NDN	0.10	\$350.00	\$35.00
Service	01/17/2023	Address emails and telephone calls regarding G. Santos; email Receiver regarding same.	NDN	0.30	\$350.00	\$105.00
Service	01/30/2023	Exchange and review emails from C. Carlyle regarding extension on reply brief in state court (.2); review motion for extension filed by Benworth in state court (.1); review Court order regarding sale of property and stay of foreclosure proceeding (.3); forward order regarding sale of property to title agent for review and consideration of immediate sale (.1); draft notice of supplemental authority for filing Middle District of Florida Order in state court (.3); confer with Receiver regarding Court Order (.2).	NDN	1.20	\$350.00	\$420.00
Service	02/02/2023	Confer with N. Newlon regarding requests for recordings of meetings from Slack, Zoom, and others; email communication	MBP	0.60	\$150.00	\$90.00

		with Receiver regarding same; begin to draft correspondence requesting records.				
Service	02/02/2023	Review email from K. Donlon re: subpoena (.1); edit letter and subpoenas to online entities (Slack, Zoom, Teams, etc.) for purposes of collecting any available data (.6).	NDN	0.70	\$350.00	\$245.00
Service	02/03/2023	Continue drafting letters to Slack, Zoom, Microsoft Teams, and RingCentral requesting documents; confer with N. Newlon regarding same; finalize same.	MBP	1.30	\$150.00	\$195.00
Service	02/08/2023	Draft subpoenas to Zoom, Slack, RingCentral, and Microsoft.	MBP	0.70	\$150.00	\$105.00
Service	02/08/2023	Confer regarding funds held in trust for receivership property.	MBP	0.10	\$150.00	\$15.00
Service	02/08/2023	Review subpoenas to non-parties and execute same (.2).	NDN	0.20	\$350.00	\$70.00
Service	02/09/2023	Attention to wire for deposit on property.	MBP	0.10	\$150.00	\$15.00
Service	02/17/2023	Payment of utilities for Lansing Island property; follow up call with RedBox+ regarding dumpster and negotiate price; confer with Receiver regarding same.	MBP	0.30	\$150.00	\$45.00
Service	02/21/2023	Review and exchange emails with Slack regarding subpoena.	NDN	0.30	\$350.00	\$105.00
Service	02/22/2023	Conference call with Slack regarding subpoena and records including follow up email to Receiver regarding same (.6); review objections by Microsoft to subpoena (.3); review Zoom email regarding production and respond to same (.2).	NDN	1.10	\$350.00	\$385.00
Service	02/28/2023	Exchange emails with Zoom re: subpoena and discussion of same.	NDN	0.20	\$350.00	\$70.00
Service	03/02/2023	Conference call with Zoom attorney regarding subpoena.	NDN	0.20	\$350.00	\$70.00
Service	03/06/2023	Call to City of Melbourne regarding water at property.	MBP	0.40	\$150.00	\$60.00
Service	03/08/2023	Review and respond to email from Receiver regarding Slack/Zoom/Microsoft subpoenas and responses to same.	NDN	0.20	\$350.00	\$70.00
Service	03/27/2023	Exchange emails with Receiver regarding status of motions and contact Court regarding same.	NDN	0.20	\$350.00	\$70.00
Service	03/28/2023	Exchange emails with Receiver and SEC	NDN	0.10	\$350.00	\$35.00

regarding documents responsive to
subpoenas and status of same.

Services Subtotal **\$2,275.00**

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	02/03/2023	Overnight mail to RingCentral, Inc.	1.00	\$47.84	\$47.84
Expense	02/03/2023	Overnight mail to Slack Technologies, Inc.	1.00	\$47.84	\$47.84
Expense	02/03/2023	Overnight mail to Zoom Video Communications, Inc.	1.00	\$47.84	\$47.84
Expense	02/03/2023	Overnight mail to Microsoft Corp.	1.00	\$47.84	\$47.84
Expense	02/13/2023	Fee service of subpoena to Slack Technologies, Inc.	1.00	\$75.00	\$75.00
Expense	02/13/2023	Fee service of subpoena to Zoom Video Communications, Inc.	1.00	\$75.00	\$75.00
Expense	02/13/2023	Fee service of subpoena to RingCentral, Inc.	1.00	\$75.00	\$75.00
Expense	02/13/2023	Fee service of subpoena to Microsoft Corporation.	1.00	\$75.00	\$75.00
				Expenses Subtotal	\$491.36

Time Keeper	Quantity	Rate	Total
Nicole D. Newlon	5.0	\$350.00	\$1,750.00
Michelle B. Patel	3.5	\$150.00	\$525.00
			Subtotal
			\$2,766.36
			Total
			\$2,766.36

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6727	02/15/2023	\$8,053.03	\$0.00	\$8,053.03

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6996	05/15/2023	\$2,766.36	\$0.00	\$2,766.36
Outstanding Balance				\$10,819.39
Total Amount Outstanding				\$10,819.39

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6996
Date: 05/15/2023



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Or, [click here](#) if you're viewing on a computer or smartphone.



INVOICE

Invoice # 6997
Date: 05/15/2023

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
2802 N. Howard Avenue
Tampa, Florida 33607

Donlon-00002-Harbor City - Legal Team - ASDIS (Asset Disposition)

Harbor City - Legal Team - ASDIS (Asset Disposition)

Services

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	01/03/2023	Review email from A. Reed regarding extension (.1); confer with Receiver re same (.1); review response to motion to determine interest and attorneys' fees (.4)	NDN	0.60	\$350.00	\$210.00
Service	01/04/2023	Email A. Reed objecting to extension (.1); review emergency motion for extension (.2); draft opposition to emergency motion for extension, send to Receiver for review, edit same, and file (.8); review Court Order scheduling hearing on emergency motion (.1).	NDN	1.20	\$350.00	\$420.00
Service	01/05/2023	Attend hearing on emergency motion to extend deadline to respond to motion for relief regarding interest and attorneys' fees by mortgage holder.	NDN	0.50	\$350.00	\$175.00
Service	01/09/2023	Draft response in opposition to petition for writ of certiorari.	NDN	3.10	\$350.00	\$1,085.00
Service	01/10/2023	Draft opposition to petition for writ of certiorari.	NDN	6.10	\$350.00	\$2,135.00
Service	01/11/2023	Review edits to opposition to petition for writ of certiorari and finalize same.	NDN	0.80	\$350.00	\$280.00
Service	01/13/2023	Review appendix for filing in Florida Court of Appeal in response to petition for writ of	NDN	0.90	\$350.00	\$315.00

		certiorari.				
Service	01/13/2023	Final review of opposition to petition for writ of certiorari.	NDN	0.30	\$350.00	\$105.00
Service	01/23/2023	Review and respond to email regarding extension on response in support of petition for writ of certiorari in State Court (.1); review and respond to emails from H. Alvarez and C. Turner regarding sale of home (.2).	NDN	0.30	\$350.00	\$105.00
Service	01/24/2023	Research value of stock purchased by Harbor City in Qualcan/Mystic Holdings, Inc.; memo to N. Newlon regarding same.	MBP	0.50	\$150.00	\$75.00
Service	01/30/2023	exchange and review emails from C. Carlyle regarding extension on reply brief in state court (.2); review motion for extension filed by Benworth in state court (.1); review Court order regarding sale of property and stay of foreclosure proceeding (.3); forward order regarding sale of property to title agent for review and consideration of immediate sale (.1); draft notice of supplemental authority for filing Middle District of Florida Order in state court (.3); confer with Receiver regarding Court Order (.2).	NDN	1.20	\$350.00	\$420.00
Service	02/01/2023	Draft motion for clarification as to Order and Order to Show Cause, including exchange of emails from Benworth counsel, review of information from Title company, and conference with Receiver regarding same (4.7); exchange emails with other lienholders regarding release of lis pendens and/or payment of lien (.4); review and respond to email from C. Carlyle regarding Benworth extension on appeal and review motion to extend time on appeal (.4).	NDN	5.50	\$350.00	\$1,925.00
Service	02/08/2023	Review messages from H. Alvarez (.2); contact H. Alvarez regarding resolution to majority owner of mortgaged property (.4).	NDN	0.60	\$350.00	\$210.00
Service	02/09/2023	Review order from appellate court regarding extension (.1); review and exchange emails from underwriter and title agent regarding closing (.3).	NDN	0.40	\$350.00	\$140.00
Service	02/09/2023	Attention to wire for deposit on property.	MBP	0.10	\$150.00	\$15.00
Service	02/14/2023	Review Response filed by Benworth to Order to Show Cause and draft Reply to same.	NDN	9.20	\$350.00	\$3,220.00

Service	02/15/2023	Finalize reply to response to order to show cause (2.6); exchange email with Receiver regarding opposition to to motion for clarification (.2); review Benworth's opposition to motion for clarification (.3); review filings in state appellate court regarding supplemental authority and reply to response to petition for writ (.2); make edits to response by Receiver and file response with exhibits (.7).	NDN	4.00	\$350.00	\$1,400.00
Service	02/16/2023	Communications with A. Read regarding reply, offer to settle, conferral regarding motion to strike; conferral regarding A. Read motion to strike; conferral regarding reply in support of motion for clarification; (1.1). Draft motion to strike (.3). Review amended response to motion for clarification and review changes between original motion and amended motion. (.5).	NDN	1.90	\$350.00	\$665.00
Service	02/16/2023	Confer with N. Newlon regarding Benworth note; review note and calculate interest due from date of default through in date of the receivership note and present day; memo to N. Newlon regarding same.	MBP	0.70	\$150.00	\$105.00
Service	02/21/2023	Review and respond to email regarding new offer on property.	NDN	0.40	\$350.00	\$140.00
Service	02/28/2023	Confer with K. Donlon and provide payoffs for liens for purposes of calculating proposal numbers to provide underwriter.	NDN	0.60	\$350.00	\$210.00
Service	03/01/2023	Exchange emails with Receiver regarding letter to underwriter regarding proposal to sell property and attach lien to proceeds, including edits of same (.2); contact lienholders for payoff information (.2); review and exchange emails with Receiver and forward proposal to mortgage holder. (.2).	NDN	0.60	\$350.00	\$210.00
Service	03/02/2023	Review and forward payoff information for property from one of the lienholders (.1); review and respond to email from Receiver regarding response to proposal (.1).	NDN	0.20	\$350.00	\$70.00
Service	03/03/2023	Review payoff information from HOA and forward to Receiver.	NDN	0.10	\$350.00	\$35.00
Service	03/08/2023	Review and forward to Receiver offer from Benworth Capital regarding disposition of property.	NDN	0.20	\$350.00	\$70.00
Service	03/13/2023	Review emergency motion and exchange emails with Receiver regarding relief	NDN	0.50	\$350.00	\$175.00

requested therein.						
Service	03/14/2023	Confer with Receiver regarding research on Benworth's mortgage default and their ability to obtain attorneys' fees (.3); conduct research regarding same (1.5); review prior pleadings (.3).	AB	2.10	\$195.00	\$409.50
Service	03/14/2023	Review response to emergency motion by Benworth and email from A. Read regarding same.	NDN	0.60	\$350.00	\$210.00
Service	03/15/2023	Continue to conduct research regarding the ability of a court to allow default interest when the default is caused by an SEC enforcement action.	AB	0.30	\$195.00	\$58.50
Service	03/15/2023	Review and respond to emails from Receiver regarding Benworth proposal and email to A. Read regarding same.	NDN	0.50	\$350.00	\$175.00
Service	03/16/2023	Continue to conduct research regarding the ability of a court to allow default interest when the default is caused by an SEC enforcement action.	AB	6.10	\$195.00	\$1,189.50
Service	03/16/2023	Review and respond to emails from Receiver regarding filing a reply and argument within same (.4); review email from A. Read regarding clarification on proposal (.1).	NDN	0.50	\$350.00	\$175.00
Service	03/17/2023	Discuss research findings with K. Donlon.	AB	0.20	\$195.00	\$39.00
Service	03/28/2023	Review contract regarding sale of property and inform Receiver of rights regarding cancellation and deposit.	NDN	0.20	\$350.00	\$70.00
					Services Subtotal	\$16,241.50

Expenses

Type	Date	Description	Quantity	Rate	Total
Expense	01/13/2023	Utilities paid to City of Melbourne for 143 Lansing Island Drive.	1.00	\$578.65	\$578.65
Expense	01/13/2023	Utilities paid for property located at 143 Lansing Island Drive.	1.00	\$684.04	\$684.04
Expense	01/18/2023	Down 2 Earth Services, LLC Inv. 7398	1.00	\$1,800.00	\$1,800.00
Expense	01/20/2023	Inv. 43371 paid to A Reliable Pool Service.	1.00	\$125.00	\$125.00
Expense	02/17/2023	Utilities paid to Florida Power & Light.	1.00	\$477.16	\$477.16

Invoice # 6997 - 05/15/2023

Expense	02/17/2023	Utilities paid to City of Melbourne.	1.00	\$180.25	\$180.25
Expense	02/17/2023	Extended service period charges paid to RedBox+ for dumpster rental at 143 Lansing Island.	1.00	\$500.00	\$500.00
Expense	02/27/2023	Utilities paid to Florida Power & Light for 143 Lansing Island Drive.	1.00	\$617.17	\$617.17
Expense	02/28/2023	Pool service Inv. 44075 paid to A Reliable Pools.	1.00	\$125.00	\$125.00
Expense	03/01/2023	Invoice 7550 paid to Down 2 Earth Services, LLC.	1.00	\$1,200.00	\$1,200.00
Expense	03/23/2023	Inv. 44778 paid to A Reliable Pool Service.	1.00	\$125.00	\$125.00
Expense	03/23/2023	Bill No. 12536629 paid to City of Melbourne.	1.00	\$54.87	\$54.87
				Expenses Subtotal	\$6,467.14

Time Keeper	Quantity	Rate	Total	
Alison Bowlby	8.7	\$195.00	\$1,696.50	
Nicole D. Newlon	41.0	\$350.00	\$14,350.00	
Michelle B. Patel	1.3	\$150.00	\$195.00	
			Subtotal	\$22,708.64
			Total	\$22,708.64

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6720	02/14/2023	\$37,609.46	\$0.00	\$37,609.46

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due	
6997	05/15/2023	\$22,708.64	\$0.00	\$22,708.64	
				Outstanding Balance	\$60,318.10
				Total Amount Outstanding	\$60,318.10

Please make all amounts payable to: Johnson, Newlon & DeCort, P.A.

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Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

INVOICE

Invoice # 6997
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EXHIBIT 4

JOHNSON, NEWLON & DeCORT, P.A.

PROPOSED RATES

<u>Professional</u>	<u>Range of Standard Rates</u>	<u>Proposed Rate</u>
Receiver	\$425	\$350
Partner	\$250-\$470	\$350
Associate	\$195-\$250	\$240
Paralegal	\$165-\$190	\$150