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 EIGHTEENTH 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 Eighteenth 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 April 1, 2026, through June 30, 2026. Attached as **Exhibit 1** is the Receiver's Fund Accounting Report for the most recent quarter ending September 30, 2026.[1]

During the time covered by this Motion, among other things, the Receiver reviewed claims submitted through the claims process, continued to field calls and emails from investors, and maintained the Receiver's website.

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**."

The Receiver filed her Quarterly Status Report during the time period covered (Doc. 255) (the "**Quarterly Status Reports**"), which contains information regarding the Receiver's efforts regarding the claims process. The

[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.

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 fifteen Quarterly Fee Applications (Docs. 82, 89, 106, 123, 143, 155, 168, 174, 178, 185, 195,200, 208, 217, 225, 232). 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), May 25, 2023 (Doc. 157), September 6, 2023 (Doc. 170), September 27, 2023 (Doc. 172), December 8, 2023 (Doc. 176), April 29, 2024 (Doc. 181), January 30, 2025 (Doc. 191), July 14, 2025 (Docs. 203 and 204), October 15, 2025 (Doc. 214), March 9, 2026 (Doc. 226), April 28, 2026

(Doc. 230), . The Magistrate has recommended the approval of the Sixteenth Motion for Fees (Doc. 238). The motion remains pending before the district court.

As shown in the Quarterly Status Report, the Professionals have provided services and incurred expenses to progress the establishment of the claims process. 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 July 1, 2026 through September 30, 2026, in the amount of **$4,025.00.** The standard hourly rate the Receiver charges clients in private litigation is $475. 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 her 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]

For the time covered by this motion, the work of the Receiver focused on analyzing claims submitted by investors and drafting the Claims Determination Motion. These activities of the Receiver are set forth in detail in the Quarterly Status Reports. 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 July 1, 2026, through September 30, 2026, are as follows:

[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
Receiver's Time and Fees for Services Rendered

Activity Category	Hours Expended	Fee Amount
AAR	0.8	$280.00
Case Administration	0.6	$210.00
Claims	6.9	$3,535.00
TOTAL	**7.2**	**$4,025.00**

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

The Receiver requests the Court award JND fees for fees related to claims and costs incurred from July 1, 2026, through September 30, 2026, in the amount of **$2,330.00**:

Professional	**Position**	**Yrs. Exp.**	**Billed Hours**	**Rate**	**Total**
Nicole D. Newlon (NDN)	Partner	20	1.0	$350.00	$350.00
Mary Gura (MG)	Paralegal	13	.3	$150.00	$45.00
Fees					$395.00
Disbursements					$1,935.00
Total			1.3		$2,330.00

A categorization of the fees and costs for which JND seeks reimbursement is attached as **Exhibit 3**. JND advanced these costs for the E-Hounds platform monthly fees and expenses related to the Receiver's website.

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 Quarterly Status Reports, 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 sold the available assets of the Receivership and has reached a settlement regarding the last asset of the Receivership. Additionally, the Receiver has completed her review of the claims submitted by aggrieved investors and has kept in communication with those investors and the SEC. Further, the Receiver has submitted her Claims Determination Motion with the Court.

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	$4,025.00
Johnson, Newlon & DeCort	$2,330.00

RECEIVER'S CERTIFICATION

The Receiver has reviewed this Eighteenth 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 previously approved by this Court. 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

LOCAL RULE 3.01(g) CERTIFICATION

The Receiver has conferred with 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 November 9, 2026, 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)
nnewlon@jnd-law.com
JOHNSON, NEWLON & DECORT, P.A.
3242 Henderson Blvd., Ste 210
Tampa, Florida 33609
T: (813) 699-4859/F: (813) 235-0462
Secondary: kdonlon@jnd-law.com;
bwalker@jnd-law.com
Counsel for Receiver Katherine Donlon

EXHIBIT 1

PDR CPAs + ADVISORS

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 July 1, 2026 to September 30, 2026 and from inception to September 30, 2026, 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
October 20, 2026

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 7/01/2026 to 9/30/2026

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 7/01/2026):			$ 262,673.05
	Increases in Fund Balance:			
Line 2	Business Income	2,149.38		
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):		2,149.38	264,822.43
	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			
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		-	-
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)			-
Line 13	**Ending Balance (As of 9/30/2026)**			264,822.43

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 7/01/2026 to 9/30/2026

3		Detail	Subtotal	Grand Total
Line 14	**Ending Balance of Fund - Net Assets:**			
Line 14a	Cash & Cash Equivalents			264,822.43
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			264,822.43
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 15a	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 15b	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 Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 15c	Tax Admistrator Fees & Bonds Not Paid by the Fund:			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	**Disbursements to Court/Other Not Paid by the Fund:**			
Line 16a	Investment Expenses/CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund		-	
Line 17	**DC & State Tax Payments**			
Line 18	**No of Claims**			
	# 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:
By: _____
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 9/30/2026

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (as of 1/1/2022)			$ -
	Increases in Fund Balance:			
Line 2	Business Income	2,149.38		
Line 3	Cash and Securities*	159,442.91		
Line 4	Interest/Dividend Income			
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation	360,881.30		
Line 7	Third-Party Litigation Income	75,000.00		
Line 8	Miscellaneous - Other			
	Total Funds Available (Line 1 - 8):		597,473.59	597,473.59
	Decreases in Fund Balance:			
Line 9	**Disbursements to Investors**			
Line 10	**Disbursements for Receivership Operations**			
Line 10a	Disbursements to Receiver or Other Professionals	258,972.51		
Line 10b	Business Asset Expenses	73,632.65		
Line 10c	Personal Asset Expenses	46.00		
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		332,651.16	332,651.16
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)			332,651.16
Line 13	**Ending Balance (As of 9/30/2026)**			264,822.43

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 9/30/2026

FUND ACCOUNTING (See Instructions):		Detail	Subtotal	Grand Total
Line 14	**Ending Balance of Fund - Net Assets:**			
Line 14a	Cash & Cash Equivalents			264,822.43
Line 14b	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund - Net Assets			264,822.43
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 15a	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 15b	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 Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses Not Paid by the Fund		-	
Line 15c	Tax Admistrator Fees & Bonds Not Paid by the Fund:			
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund			-
Line 16	**Disbursements to Court/Other Not Paid by the Fund:**			
Line 16a	Investment Expenses/CRIS Fees			
Line 16b	Federal Tax Payments			
	Total Disbursements to Court/Other Not Paid by the Fund		-	
Line 17	**DC & State Tax Payments**			
Line 18	**No of Claims**			
	# 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:
By: _____
Title
Date _____

EXHIBIT 2

INVOICE

Invoice # 12394
Date: 10/20/2026

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
3242 Henderson Blvd., Ste. 210
Tampa, Florida 33609

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	07/16/2026	Telephone call with A. Schiff regarding status of corporate defendants.	KD	0.20	$350.00	$70.00
Service	07/17/2026	Review Wyoming and Nevada websites for corporate status of receivership entities; forward same to A. Schiff.	KD	0.60	$350.00	$210.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	0.8	$350.00	$280.00
		Subtotal	**$280.00**
		Total	**$280.00**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12394	10/20/2026	$280.00	$0.00	$280.00

Outstanding Balance	**$280.00**
Total Amount Outstanding	**$280.00**

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

Payment is due upon receipt.

Johnson, Newlon & DeCort, P.A.

INVOICE

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Invoice # 12394
Date: 10/20/2026

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INVOICE

Invoice # 12395
Date: 10/20/2026

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
3242 Henderson Blvd., Ste. 210
Tampa, Florida 33609

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

Harbor City - Receiver - (CASE - Case Administration)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	07/06/2026	Review criminal docket and filings regarding Maroney's guilty plea; email to U.S. Attorney regarding same; email to A. Schiff regarding status update.	KD	0.60	$350.00	$210.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	0.6	$350.00	$210.00
		Subtotal	**$210.00**
		Total	**$210.00**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12395	10/20/2026	$210.00	$0.00	$210.00
			Outstanding Balance	**$210.00**
			Total Amount Outstanding	**$210.00**

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Tampa, FL 33609

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Date: 10/20/2026

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INVOICE

Invoice # 12396
Date: 10/20/2026

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
3242 Henderson Blvd., Ste. 210
Tampa, Florida 33609

Donlon-00012-Harbor City - Receiver - (CLAIMS - Claims Process)

Harbor City - Receiver - (CLAIMS - Claims Process)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	07/09/2026	Continue working on claims distribution motion; emails with claimants (E.P., G.G., N.P., J.K., R.E., G.V., and D.M.) regarding distribution history.	KD	6.10	$350.00	$2,135.00
Service	07/10/2026	Review claim of R.A.; telephone call and email to same; emails with E.P. and N.P. regarding distribution information.	KD	0.90	$350.00	$315.00
Service	07/13/2026	Emails with E.P. and G.V. regarding claims (.2); revise spreadsheet (.2).	KD	0.40	$350.00	$140.00
Service	07/22/2026	Telephone call with investor B.H. regarding claims status.	KD	0.10	$350.00	$35.00
Service	07/28/2026	Emails with R.A. and D.M. regarding claims (.2); continue drafting claims determination motion (2.1).	KD	2.30	$350.00	$805.00
Service	08/12/2026	Revise and finalize motion to seal investor information (2); confer with N. Newlon regarding same (.1).	KD	0.30	$350.00	$105.00

Time Keeper	Quantity	Rate	Total
Katherine Donlon	10.1	$350.00	$3,535.00
		Subtotal	**$3,535.00**

Total	**$3,535.00**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12396	10/20/2026	$3,535.00	$0.00	$3,535.00
			Outstanding Balance	**$3,535.00**
			Total Amount Outstanding	**$3,535.00**

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EXHIBIT 3

INVOICE

Invoice # 12393
Date: 10/20/2026

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
3242 Henderson Blvd., Ste. 210
Tampa, Florida 33609

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

Harbor City - Legal Team - CASE (Case Administration)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	07/29/2026	Draft Quarterly Report.	NDN	0.30	$350.00	$105.00
Service	07/30/2026	Exchange emails re: filing quarterly report and update with edits (.2).	NDN	0.20	$350.00	$70.00

Time Keeper	Quantity	Rate	Total
Nicole D. Newlon	0.5	$350.00	$175.00
		Subtotal	**$175.00**
		Total	**$175.00**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
12393	10/20/2026	$175.00	$0.00	$175.00
			Outstanding Balance	**$175.00**
			Total Amount Outstanding	**$175.00**

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Johnson, Newlon & DeCort, P.A.

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Invoice # 12397
Date: 10/20/2026

Johnson, Newlon & DeCort, P.A.

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Tampa, FL 33609

Katherine Donlon
3242 Henderson Blvd., Ste. 210
Tampa, Florida 33609

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

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

Type	Date	Description	Quantity	Rate	Total
Expense	07/01/2026	Monthly receivership website hosting fees.	1.00	$50.00	$50.00
Expense	08/01/2026	Monthly receivership website hosting fees.	1.00	$50.00	$50.00
Expense	08/04/2026	E-Hounds Invoice No. 75238.	1.00	$595.00	$595.00
Expense	08/31/2026	E-Hounds Invoice No. 76943.	1.00	$595.00	$595.00
Expense	09/01/2026	Monthly receivership website hosting fees.	1.00	$50.00	$50.00
Expense	09/30/2026	E-Hounds Invoice No. 76954.	1.00	$595.00	$595.00

Time Keeper	Quantity	Rate	Total
		Subtotal	**$1,935.00**
		Total	**$1,935.00**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due

12397	10/20/2026	$1,935.00	$0.00	$1,935.00
			Outstanding Balance	**$1,935.00**
			Total Amount Outstanding	**$1,935.00**

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Invoice # 12398
Date: 10/20/2026

Johnson, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210
Tampa, FL 33609

Katherine Donlon
3242 Henderson Blvd., Ste. 210
Tampa, Florida 33609

Donlon-00006-Harbor City - Legal Team - CLAIMS (Claims Process)

Harbor City - Legal Team - CLAIMS (Claims Process)

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	07/13/2026	Communicate with a claimant regarding status of the claims process (.3).	MG	0.30	$150.00	$45.00
Service	07/30/2026	Review filing re: seal (.1).	NDN	0.10	$350.00	$35.00
Service	08/12/2026	Review and edit motion to file under seal claimant's information.	NDN	0.40	$350.00	$140.00

Time Keeper	Quantity	Rate	Total
Nicole D. Newlon	0.5	$350.00	$175.00
Mary Gura	0.3	$150.00	$45.00
		Subtotal	**$220.00**
		Total	**$220.00**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due

12398	10/20/2026	$220.00	$0.00	$220.00
			Outstanding Balance	**$220.00**
			Total Amount Outstanding	**$220.00**

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