

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**EMPIRE HOLDINGS GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,**

Defendants.

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: **Civil Action**
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: **No. 2:24-cv-04949-WB**
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**RECEIVER, KEVIN DOOLEY KENT’S MOTION FOR APPROVAL
OF FOURTH INTERIM FEE APPLICATION WITH INCORPORATED
MEMORANDUM OF LAW FOR THE PERIOD
MARCH 1, 2025 THROUGH OCTOBER 31, 2025**

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Date: November 11, 2025

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I. INTRODUCTION

Following the entry of the September 20, 2024 Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief (ECF No. 19) (the “TRO Order”), Kevin Dooley Kent, in his capacity as Temporary Receiver (the “Receiver”), assumed control of Empire Holdings Group LLC d/b/a Ecommerce Empire Builders d/b/a Storefunnels.net (hereinafter “EEB”) and its existing business operations, and thereafter assumed control of/began exercising his duties with respect to nonparty entities Star Active Sports LLC (“Star Active”), Empire Partner Network LLC (“Empire Partner”), Atlas Fund Limited Partnership (“Atlas Fund”), Atlas Fund Trust (“Atlas Trust”), and Atlas Fund Land Trust (“Atlas Land”) (collectively, the “Atlas Entities”) after identifying the nonparty entities as Receivership Entities in October 2024. The TRO Order was subsequently extended by the Stipulated Preliminary Injunction entered on November 8, 2024 (“Stipulated PI”) (ECF No. 49), which extended the Receiver’s duties set forth in the TRO Order.

Understandably, and as is typical for receiverships such as this, the weeks following the entry of the TRO Order were intense, with the Receiver, his Counsel and support staff at Clark Hill PLC (“Clark Hill,” “Law Firm,” or “Counsel”), and his Accountants at Alvarez & Marsal Disputes and Investigations, LLC (“A&M” or “Accountant”) (collectively, the “Retained Personnel”) devoting a significant amount of time to carrying out the Receiver’s duties. As explained in detail in the Receiver’s First Interim Fee Application (ECF No. 54), the complexities of EEB’s operations resulted in significant time and effort expended by the Receiver and his Retained Personnel during the first six weeks of the Receivership in maintaining the business operations for existing EEB customers, which was exacerbated by the fact that EEB does not have a physical office location, operates entirely by Cloud-based/electronic means through various

platforms, and has contractors all over the world. The nature of these international online business operations also made data and fact gathering complex and time-consuming. After the first six weeks of the Receivership—and as shown in the Receiver’s previously-filed Written Status Reports and Interim Fee Applications (ECF Nos. 70, 72)—the time and effort expended by the Receiver and his Retained Personnel reduced significantly, as the Receiver and his Retained Personnel devoted the majority of their time focusing on shutting down EEB’s business operations, factual and asset preservation and investigation, handling tax-related and accounting issues, and addressing customer inquiries.

On May 8, 2025, this Court entered the Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief (the “Permanent Injunction”) (ECF No. 78), in which the Federal Trade Commission and Defendants stipulated “to resolve all matters in dispute in this action between them.” Permanent Injunction at 1. Among other things, the Permanent Injunction formally names Empire Realty Holdings LLC (“Empire Realty”) as an additional Receivership Entity, and orders the Receiver to “take the necessary steps to wind down the businesses of the Receivership Entities, liquidate assets, and pay any net proceeds to the Commission to satisfy the monetary judgment[.]” *Id.* at 15 § VII. “In carrying out these duties,” the Permanent Injunction authorizes and directs the Receiver to, *inter alia*, “[t]ake any and all steps that the Receiver concludes are appropriate to wind down the affairs of the Receivership Entities. . . . continue to collect, marshal, and take custody, control, and possession of all the funds, property, premises, accounts, documents, mail, and other assets of, or in the possession or under the control of the Receivership Entities, wherever situated, . . . [s]ell the nonliquidated assets of the Receivership Estate using commercially reasonable procedure without further order of the Court[.]” and “[p]erform all acts necessary or advisable to complete an accurate accounting of assets of the

Receivership Estate, and prevent unauthorized transfer, withdrawal, or misapplication of said assets.” *Id.* § VII ¶¶ A-B, F, L.¹

Accordingly, pursuant to Section VIII, Paragraph C of the Permanent Injunction, the Receiver now submits this Fourth Interim Fee Application for the period March 1, 2025 through October 31, 2025 (the “Fourth Reporting Period”), moving for approval of payment of fees and expenses invoiced by the Receiver, his Law Firm Clark Hill, and his Accountant A&M during the Fourth Reporting Period. As is apparent from the Receiver’s Fourth and Fifth/Final Written Status Reports (ECF Nos. 86-87) and the bills submitted in connection herewith, the Receiver and his Retained Personnel have devoted their time during this reporting period to liquidating the assets of the Receivership Estate, handling tax-related and accounting issues, creating and facilitating the non-consumer creditor claims process, completing an accurate accounting of the assets of the Receivership Estate, and winding down the Receivership Estate. Additionally, pursuant to Section VIII, Paragraph E of the Permanent Injunction, the Receiver requests a holdback of \$200,000.00 in funds as a reserve to cover additional fees and costs related to future actions of the Receiver and his agents to conclude the Receivership. If any of the \$200,000.00 “remain[s] in the reserve funds after the payment of fees and expenses approved by the Court” pursuant to a future fee application, the remainder of said funds will “be immediately paid to the [FTC] or its designated agents.” Permanent Injunction § VIII ¶ E.

¹ It is the Receiver’s understanding that the terms of the Preliminary Injunction—specifically with regard to the Receiver’s rights and obligations—remain in full effect, as the Permanent Injunction only states that it has modified “[t]he asset freeze authorized by the Stipulated Preliminary Injunction.” (ECF No. 78 § V ¶ F). Indeed, the Permanent Injunction provides that while winding down the affairs of the Receivership Entities, the Receiver shall “[c]ontinue to exercise full control over the Receivership Entities[,] continue to collect, marshal, and take custody, control and possession” of assets of the Receivership Entities, and “continue to have full control over the management and personnel of the Receivership Entities.” (*Id.* § VII ¶¶ A-C).

II. BACKGROUND OF APPOINTMENT

On September 18, 2024, the Federal Trade Commission (“FTC”) filed a Complaint for Permanent Injunction, Monetary Judgment, and Other Relief against Defendants EEB and Peter Prusinowski (“Prusinowski”), alleging that Defendants violated Section 5(a) of the FTC Act, 15 U.S.C. § 45(a); the FTC’s Trade Regulation Rule entitled “Disclosure Requirements and Prohibitions Concerning Business Opportunities (“Business Opportunity Rule”), 16 C.F.R. Part 437; and the Consumer Review Fairness Act (“CRFA”), 15 U.S.C. § 45b. *See* ECF No. 1 ¶ 1. The FTC alleges that “Defendants deceptively market and sell ecommerce business opportunities and self-study programs by falsely claiming that consumers will generate substantial income from online stores that are ‘powered by artificial intelligence; and Defendants’ ‘proven’ strategies.” *Id.* ¶ 2. The FTC alleges that Defendants falsely promised consumers significant earnings when, in reality, the promised profits never materialize, thereby leaving clients with failed businesses that generate little, if any, profits, while Defendants enrich themselves. *Id.* The FTC also alleges that Defendants use non-disparagement clauses which violate the Consumer Review Fairness Act, and that Defendants failed to provide statements and disclosure documents required by the Business Opportunity Rule. *Id.* ¶ 3. The FTC alleges that “[s]ince 2021, Defendants have deceived consumers out of at least \$14.3 million. *Id.* ¶ 4.²

Along with its Complaint, the FTC filed an Emergency Motion for Temporary Restraining Order with an Asset Freeze and Other Equitable Relief, and an Order to Show Cause Why a Preliminary Injunction Should Not Issue (“Motion for TRO”). (ECF No. 2). In its Motion for TRO, the FTC sought the appointment of a receiver. The FTC also filed its Recommendation for

² The Receiver and his Retained Personnel have determined that EEB reported revenue and purported operating expenses of approximately \$21.8 million and \$17.3 million, respectively, from May 16, 2018 through August 31, 2024, and, based on available accounting records, nearly all funds generated by EEB were transferred to/for the benefit of Prusinowski after payment of purported expenses.

Temporary Receiver that same day, proposing the appointment of Kevin Dooley Kent as Receiver. (ECF No. 8). The supporting materials submitted therewith set forth the following rates for the Receiver, Law Firm, and Accountant, which provided substantial discounts from their standard 2024 rates, and represent even greater discounts from their 2025 rates:

<u>The Receiver</u>	
Name	Rate
Kevin Dooley Kent	\$722.50

<u>The Law Firm</u>	
Clark Hill PLC	
Name/Position	Rate
Senior Counsel (Megan Guernsey)	\$633.25
Member (Robin Weiss) ³	\$562.50
Associates	\$292.50–\$436.50
Paraprofessionals	\$270.00

<u>The Accountant</u>	
Alvarez & Marsal Disputes and Investigations, LLC	
Name/Position	Rate
Michael Shanahan, Managing Director	\$750.00
Managing Directors	\$850.00
Senior Director	\$635.00
Director	\$575.00
Manager	\$490.00
Senior Associate	\$450.00
Associate	\$350.00

See id. Ex. A.

On September 20, 2024, based upon the FTC’s recommendation, the Court entered the TRO Order which appointed Kevin Dooley Kent as Receiver. (ECF No. 19). The TRO Order authorized the Receiver to “[c]hoose, engage, and employ attorneys, accountants, appraisers, and

³ Robin Weiss was promoted from Senior Attorney to Member at Clark Hill effective January 1, 2025. Nonetheless, her hourly rate remains the same.

other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by [the TRO] Order.” TRO Order § XII ¶ F.⁴ The Receiver engaged the Law Firm and Accountant to provide professional services as permitted by the TRO Order, at the rates set forth in Exhibit A to the Recommendation for Temporary Receiver. *See* ECF No. 8 Ex. A.

The TRO Order and Stipulated PI both provide that “the Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the Assets now held by, in the possession or control of, or which may be received by, the Receivership Entities.” TRO Order § XVIII; Stipulated PI § XIX. The Permanent Injunction likewise provides that the Receiver shall “[c]ontinue to be entitled to reasonable compensation for the performance of the Receiver’s duties pursuant to th[e Permanent Injunction], including duties performed by the Receiver’s agents, including accountants and lawyers, and for the cost of actual out-of-pocket expenses incurred by them, from the assets of the Receivership Estate, at the hourly rate previously agreed to by the Receiver.” Permanent Injunction § VII ¶ M. The Permanent Injunction further provides that “[n]o later than 14 days after submission of the Final Report, the Receiver shall file an application for payment of compensation and expenses associated with his performance of his duties as Receiver.” *Id.* § VIII ¶ C. Moreover, “[w]ith Court approval, the Receiver may hold back funds for a specified period as a reserve to cover additional fees and costs related to actions to be addressed in a supplemental application.” *Id.* ¶ E.

⁴ The Receiver’s appointment and authority to engage his Retained Personnel was extended by the Stipulated PI. *See* Stipulated PI § XIII ¶ F.

In light of the foregoing, the Receiver submits this Fourth Interim Fee Application seeking (1) reasonable compensation for the fees and out-of-pocket expenses incurred by the Receiver, Law Firm, and Accountant for the period March 1, 2025 through October 31, 2025, for the Court's consideration and approval, and (2) approval to hold back \$200,000.00 in funds as a reserve to cover additional fees and costs related to future actions of the Receiver and his agents to conclude the Receivership. As is apparent from the Receiver's Written Status Reports submitted to the Court during the Fourth Reporting Period (ECF Nos. 86-87)⁵ and from the corresponding invoices, the Receiver and his Retained Personnel's time devoted to this matter has remained limited to matters required to liquidate assets and wind down the Receivership Estate.

III. ASSETS, EXPENSES, AND LIABILITIES OF THE RECEIVERSHIP ESTATE

A. Assets

As of November 10, 2025, the total balance in the Receivership Accounts is \$893,186.53. This balance is the result of the wire and transfer activity set forth below.

Since the opening of the Receivership Accounts through November 10, 2025, the Receivership Accounts have received:⁶ (a) \$610,672.41 in funds from Schwab from the EEB account on 10/1/24; (b) \$0.07 cents in Preauthorized ACH Credit from PayPal in connection with the Receiver's set up of a PayPal account in an attempt to pay back-office staff through that platform; (c) \$77,000.00 from Gordon Rees on 10/7/24; (d) \$51,945.01 from TD Bank from the EEB accounts on 10/10/24; (e) \$613,202.79 in funds from Schwab from the Atlas Fund account 10/18/24; (f) \$10,211.26 in funds from TD Bank from the Empire Partner account on 11/12/24; (g) \$18,642.00 from Gordon Rees on 11/12/24; (h) \$2,711.91 from PayPal on 12/4/24; (i) an

⁵ The Receiver's Fourth and Fifth/Final Written Status Reports to the Court (ECF Nos. 86-87) are attached hereto as Exhibits A and B, respectively, and are both incorporated by reference as if fully set forth herein.

⁶ In or about August 2025, the Receiver opened an interest-bearing Receivership savings account to hold the bulk of the Receivership Assets, aside from those needed to cover routine expenses.

additional \$971.75 in remaining funds from the Schwab Atlas Fund account on 12/9/24;⁷ (j) \$1,908.73 from Stripe on 1/21/25; (k) \$341.76 in funds from Schwab from the EEB account on 1/21/25; (l) \$181.96 from Audible on 1/23/25;⁸ (m) \$145,010.00 from the sale of the Rolex watches, coins, and other items in the safe deposit box pursuant to the Permanent Injunction, divided between two equal payments on 5/19/25 and 5/21/25; (n) \$100.00 on 6/12/25 for a safety deposit box refund from TD Bank; (o) \$39,720.25 from Stripe on 6/16/25, representing the balance in the Storefunnels Stripe Account; (p) \$2,994.30 in attorney fees from Stripe on 7/7/25, awarded in connection with the Receiver's Motion to Enforce Stripe's compliance with turning over the Storefunnels Stripe Account balance to the Receivership Account; (q) a \$5,937.79 check from TD Bank for the balance of the Empire Realty account upon account closure, which was deposited on 10/7/25; (r) a \$4,227.19 check from TD Bank for the balance of the Empire Partner account upon account closure, which was deposited on 10/22/25; (s) \$0.04 from Google on 10/24/25 as a credit for an attempted payment; (t) \$178.30 in total interest credited on 8/29/25, 9/30/25, and 10/31/25; and (u) \$224,606.49 in connection with the sale of the Constitution Ave Property on 11/5/25, as discussed further below.^{9,10} As noted in the Fifth/Final Written Status Report, additional/potential assets include the balance in Empire Partner's PayPal account (\$216.45 as of 7/25/25), which the

⁷ This is from a trade that was requested when the Receiver submitted his initial request for liquidation and transfer of the account, but which did not go through until later.

⁸ The Receiver and his agents do not definitively know what the \$181.96 from Audible is specifically for but believe that it relates to the sale of an EEB book.

⁹ This excludes transactions that cancelled one another out—*e.g.*, withdrawals and deposits totaling 19 cents each to verify the Receiver's PayPal account on December 17, 2024 and refunds for failed wire transfers to back-office staff that were re-initiated after the funds were returned.

¹⁰ While the Receiver previously identified a potential \$95,000 shareholder loan as an asset in the Receiver's Accounting (ECF No. 53), the Receiver's Accountant was unable to locate any support for this loan balance outside of QuickBooks. Accordingly, the loan was reclassified as an equity distribution on the 2024 tax return for Empire Holdings.

Receiver's counsel will continue with limited efforts to attempt to collect from PayPal with the assistance of PayPal's counsel. *See* Ex. B, ECF No. 87 at 3-4, 14.

The Receiver closed the sale of the Constitution Ave Property at Keller Williams in Doylestown, PA on November 5, 2025. *See* Ex. B, ECF No. 87 at 4-6 (discussing the Constitution Ave Property, the Receiver and his agents' efforts to sell the Property, and plans for the sale closing on November 5, 2025). The Receiver accepted a cash offer of \$356,000.00 for the Property. After reductions for (a) payment of state and local transfer taxes (\$3,560.00), (b) payoff of the mortgage for the property (\$110,303.81), (c) payment of commissions (\$17,800.00), (d) payment of various other miscellaneous closing-related costs and fees including notary fees, certifications, etc. (\$1,345.91), (e) payment of a \$600.00 closing cost credit for clean-up of miscellaneous items inadvertently left in the attic of the Property, and (f) the application of credits for taxes and HOA payments made by the Receiver covering time periods after the sale (\$2,216.21), the net sale proceeds of \$224,606.49 were wired to the Receivership Account in connection with the sale closing for the Property on November 5, 2025.

B. Expenses

The Receiver paid the following in professional fees and expense reimbursements on May 12, 2025, in connection with the Court's approval of the Receiver's Third Interim Fee Application: (a) \$5,274.25 to Clark Hill PLC for professional fees incurred by the Receiver; (b) \$45,068.85 to Clark Hill PLC for professional fees incurred by the Receiver's counsel; (c) \$786.25 to Clark Hill PLC for expenses incurred by the Receiver's counsel; (d) \$37,846.50 to A&M for professional fees incurred by them in their role as the Receiver's accountants; and (e) \$27.48 to A&M for expenses incurred by the Receiver's accountants.

Additional administrative expenses through November 10, 2025 include the following: (a) \$81.02 in total payments to GoDaddy for domain/email address renewals (four payments of \$9.71

made on 3/3/25, 3/18/25, 4/22/25, and 4/23/25, and one payment of \$42.18 made on 10/16/25); (b) \$1,175.00 paid to the prior tenant of the Constitution Ave Property on 4/14/25, in resolution of the dispute over his Security Deposit; (c) \$150.00 paid to TD Bank on 5/2/25 for the safe deposit box (\$100 of which was subsequently returned following the closure of the safe deposit box); (d) \$1,900.00 paid to Barlow Consulting on 7/10/25, for EEB's 401K Plan Administration and Termination; (e) \$157.35 paid to Nickett Landscaping on 8/20/25, for lawn maintenance services for the Constitution Ave Property; (f) \$4,632.00 in total payments to DConstruct DiSigns LLC, for home improvement services for the Constitution Ave Property (via three checks payments made on 9/2/25, 9/14/25, and 9/18/25); (g) \$997.50 paid to Olden Carpet and Flooring on 9/16/25, for carpet replacement for the Constitution Ave Property;¹¹ (h) \$359.73 paid to SafeCo Insurance, the prior Constitution Ave Property insurance policy, on 10/13/25 to resolve an unaddressed, outstanding remaining balance for coverage during the Receivership period; (i) \$973.15 in total payments to WSFS for various bank fees; (j) \$12,819.86 in total mortgage payments for the Constitution Ave Property (including principal, interest, and escrow); (k) \$189.72 in total water bills paid to North Wales Water Authority for the Constitution Ave Property; (l) \$297.61 in total sewer bills paid to Bucks County Water and Sewer Authority for the Constitution Ave Property; and (m) \$1,456.60 in total HOA payments for the Constitution Ave Property, which includes \$434.85 in monthly HOA fees and \$125.50 for past lawn mowing services before after the previous tenant moved out and before Nickett Landscaping was engaged. *See also* Ex. A, ECF No. 86 at 13-14; Ex. B, ECF No. 87 at 14-15.

¹¹ The total cost of carpet replacement was \$1,995.00. The Receiver had to pay an initial deposit of \$997.50 to Olden Carpet & Flooring via credit card. That expense is included on Clark Hill's invoice.

C. Potential Liabilities (Non-Consumer Creditor Claims)

As reported in the Fifth/Final Written Status Report, the Receivership Estate's potential liabilities are with respect to non-consumer creditor claim submissions that have been acknowledged and accepted by the Receiver, which total \$152,212.12 and consist of: (1) \$143,165.00 in total claims submitted by AMEX; (2) a \$1,100.00 claim submitted by Paul Morana/Morana Enterprises; and (3) a \$7,947.12 claim submitted by Jijo William Nadar. *See* Section IV, *supra*. Pursuant to Section VIII of the Permanent Injunction and the notice that the Receiver sent via electronic mail to the claimants immediately following submission of the Fifth/Final Report to the Court on October 28, 2025, these claimants have until November 25, 2025 to file objections to the Receiver's distribution of funds to (1) pay the costs and expenses of administering the Receivership Estate (including compensation and expense reimbursement for the Receiver and his personnel), and then (2) pay all remaining funds to the FTC to reduce the monetary judgment award entered against Defendants in this action, subject to the \$200,000.00 that the Receiver is requesting the Court's approval to hold back as reserve funds to cover additional fees and costs related to future actions of the Receiver and his agents to conclude the Receivership. The Receiver will only pay these claims on behalf of the Receivership Estate if the Court, after reviewing the Fifth/Final Report and any timely submitted objections, orders the Receiver to do so. *See* Permanent Injunction § VIII ¶ D.

IV. CURRENT AND PREVIOUS BILLINGS

The total fees incurred by the Receiver for the Fourth Reporting Period are \$23,987.00. The total fees incurred by the Law Firm for the Fourth Reporting Period are \$122,584.35, while

the Law Firm's expenses total \$1,783.10.¹² The total fees incurred by the Accountant for the Third Reporting Period are \$49,092.50, while the Accountant's expenses total \$0.30.

This is the fourth interim fee application for approval of fees and expenses of the Receiver, Law Firm, and Accountant. A summary of the prior interim fee applications in this matter are as follows:

	Fees	Expenses	Status
First Interim Fee Application for the Period September 20, 2024 through October 31, 2024, filed November 19, 2024 (ECF No. 54)			
Receiver	\$112,782.25	\$0.00	Approved 12/18/24 (ECF No. 64)
Law Firm	\$283,322.69	\$6,176.56	
Accountant	\$153,203.00	\$0.00	
Second Interim Fee Application for the Period November 1, 2024 through December 31, 2024, filed February 4, 2025 (ECF No. 70)			
Receiver	\$21,169.25	\$0.00	Approved 2/20/25 (ECF No. 71)
Law Firm	\$92,451.80	\$5,094.72	
Accountant	\$54,285.00	\$31.76	
Third Interim Fee Application for the Period January 1, 2025 through February 28, 2025, filed April 10, 2025 (ECF No. 72)			
Receiver	\$5,274.25	\$0.00	Approved 5/5/25 (ECF No. 76)
Law Firm	\$45,068.85	\$786.25	
Accountant	\$37,846.50	\$27.48	

As evidence of the time and effort the Receivership has required, and in support of the fee compensation and expense reimbursement sought herein, the Receiver is submitting herewith the following exhibits for the Court's review and consideration:^{13,14}

¹² The Receiver has excluded an \$11.44 expense for a business meal which was inadvertently included on Clark Hill's bill, reducing the expenses sought from \$1,794.54 to \$1,783.10.

¹³ Consistent with the Court's November 21, 2024 Order (ECF No. 58) regarding the Receiver's Motion to Seal billing records submitted in connection with the Receiver's First Interim Fee Application (ECF No. 56), the Receiver is attaching redacted billing records in support of this Fourth Interim Fee Application, in which billing narratives describing privileged strategy and work product have been redacted. The Receiver can provide fully unredacted versions of the billing records under seal and/or submit them for *in camera* review, should the Court so request.

¹⁴ Due to the Government shutdown, the FTC has not reviewed the billing records submitted in connection with this Motion and, upon information and belief, will not be able to review this Motion until the Government reopens.

- Exhibit “C”—Summary of Legal Professional Time of the Receiver;
- Exhibit “D”—Summary of Legal Professional & Paraprofessional Time and Expenses of the Receiver’s Counsel; and
- Exhibit “E”—Summary of Accounting Professional & Paraprofessional Time and Expenses.

These exhibits, as well as the narrative descriptions in this Application, evidence the time and labor employed in this matter.

The following is a breakdown of the Receiver’s hours and fees for the Fourth Reporting Period:¹⁵

Name/Position	Hourly Rate	Hours	Fee Amount
Kevin Dooley Kent, Receiver	\$722.50	33.20	\$23,987.00

The following is a breakdown of the Law Firms’ hours and fees for the Fourth Reporting Period, broken down by biller:¹⁶

Name/Position	Hourly Rate	Hours	Fee Amount
Robin Weiss, Member	\$562.50	66.10	\$37,181.25
Stephen M. Wolf, Member	\$562.50	1.30	\$731.25
Vanessa Huber, Associate	\$436.50	134.90	\$58,883.85
Madison Mull, Associate	\$300.00	8.20	\$2,460.00
Justin Russell, Paralegal	\$270.00	84.70	\$22,869.00
Ching Chew, Litigation Project Manager	\$270.00	1.70	\$459.00
Totals		314.10	\$122,584.35

¹⁵ This table excludes 2.3 hours that are not being charged to the Receivership Estate.

¹⁶ This table excludes hours that are not being charged to the Receivership Estate—2.5 hours for Robin Weiss, 4.2 hours for Vanessa Huber, 0.1 hours for Justin Russell, and 10.4 hours for Ching Chew.

The following is a breakdown of the Accountant's hours and fees for the Fourth Reporting Period, broken down by biller:

Name/Position	Hourly Rate	Hours	Fee Amount
Michael Shanahan, Managing Director (Forensic Analysis Team)	\$750.00	2.30	\$1,725.00
Tracy Gosau, Director (Forensic Analysis Team)	\$575.00	12.10	\$6,957.50
Amee Mehta, Senior Associate (Forensic Analysis Team)	\$450.00	10.00	\$4,500.00
Sean Menendez, Managing Director (Tax Team)	\$850.00	8.20	\$6,970.00
Emilio Martinez, Managing Director (Tax Team)	\$850.00	0.50	\$425.00
Jennifer Palacios, Senior Director (Tax Team)	\$635.00	25.50	\$16,192.50
Adalys Alvarez, Senior Associate (Tax Team)	\$450.00	2.50	\$1,125.00
Drew Herring, Senior Associate (Tax Team)	\$450.00	19.75	\$8,887.50
Christopher Exarhos, Associate (Tax Team)	\$350.00	5.80	\$2,030.00
Daneil Ayala, Associate (Tax Team)	\$350.00	0.80	\$280.00
Totals		87.45	\$49,092.50

V. REQUEST FOR COMPENSATION FOR FEES AND EXPENSES

This Court has the power to award fees to the Receiver for his services and for expenses he incurred in the performance of his duties. *See 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.”); *see also Securities & Exch. Comm’n v. Elliot*, 953 F. Supp. 1560 (11th Cir. 1992) (noting that the receiver is entitled to compensation for faithful performance of his duties). This Court has discretion to determine compensation to be awarded to a court-appointed receiver and his counsel and “may consider all of the factors involved in a particular receivership in determining the appropriate fee.” *Gaskill v. Gordon*, 27 F.3d 248, 253 (7th Cir. 1994). The Third Circuit has stated that relevant considerations include “the time and labor required . . . in the proper performance of the duties imposed by the court upon the receivers, the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained.” *United States v. Larchwood Gardens, Inc.*, 404 F.2d 1108, 1110 (3d Cir. 1968) (citing *United States v. Code Products Corp.*, 362 F.2d 669, 673 (3d Cir. 1966)); *see also Securities & Exch. Comm’n v. W.L. Moody & Co.*, 374 F. Supp. 465, 483, 485 (S.D. Tex. 1974), *aff’d*, 519 F. 2d 1087 (5th Cir. 1975) (explaining that a “basic consideration is the nature and complexity of the legal problems confronted and the skill necessary to resolve them” and that “[t]ime spent cannot be ignored.”); *Fed. Trade Comm’n v. AI Janitorial Supply Corp.*, 2020 WL 887386, at *4 (N.D. Ill. Feb. 24, 2020) (quoting *U.S. S.E.C. v. Wealth Mgmt. LLC*, 2011 WL 4479518, at *1 (E.D. Wis. Sept. 26, 2011)) (“[C]ourts evaluate fee awards by considering (1) ‘the time records presented,’ (2) ‘the benefits to the receivership estate,’ and (3) ‘the quality of the work performed.’”). Moreover, courts have recognized that the fees and expenses incurred in the

beginning of a receivership will not necessarily be typical of future fee applications, due to the extent of initial start-up work required to secure and liquidate the assets and to wind up the business entities. *See Gordon v. Dadante*, 2008 WL 1805787, at *11 (N.D. Ohio Apr. 18, 2008) (recognizing that, with receivership, as is “common in cases of this nature, the bulk of the effort—and expense—is frontloaded.”).

Under these standards—and given the time and effort the Receiver and his Retained Personnel have devoted to this matter, as shown in detail in the Receiver’s Fourth and Fifth/Final Written Status Reports (ECF Nos. 86-87)—the Receiver has adequately demonstrated that the amount of fees requested is appropriate. The Receiver has attempted to maximize cost savings as much as possible by, for example, assigning professionals and paraprofessionals with the lowest billable rate appropriate for the task at issue. The Receiver and his counsel have utilized non-billing administrative personnel where appropriate—*e.g.*, utilizing non-billing staff to assist with change of address procedures, the preparation/handling of all mailed-out formal correspondence, and communicating with service providers to the extent possible, having non-billing staff oversee repairs performed at the Constitution Ave Property, and having lower-billing personnel manage the Receivership inbox and coordinate the payment of expenses.

Moreover, as reflected in the Summary of Time and Expenses submitted by the Receiver, Law Firm, and Accountant set forth in Section IV, *supra*, the time and effort expended by the Receiver and his Retained Personnel has continued to decline on average as compared to the time and effort expended during the Second and Third Reporting Periods. Indeed, as courts have recognized, *see Gordon*, 2008 WL 1805787, at *11, the Receiver and his Retained Personnel had to perform various time-consuming tasks immediately following the Receiver’s appointment to, *inter alia*, secure Receivership Assets and Documents and investigate, take control of, and manage

EEB's business operations, in accordance with the TRO Order. After the Receiver shut down EEB's business operations, A&M completed its initial accounting analysis, and Storefunnels was shut down/transferred to Simvol, the Receiver and his Retained Personnel have been able to—and continue to—expend less time and effort on this matter generally. And following the entry of the Permanent Injunction, the Receiver and his Retained Personnel have focused their efforts on matters necessary to winding down the Receivership.

The Receiver and his Law Firm have never sought compensation for any pre-appointment time, and the Receiver has continued to write off certain fees incurred since his appointment, as indicated by the “No Charge” entries and/or time entries showing 0.0 hour totals on the Receiver and Law Firm's bills submitted with this Application. Additionally, the Receiver and his Retained Personnel are handling this matter at substantially discounted billing rates, with the Receiver and the Law Firm operating at a 10-15% discount from their standard 2024 rates (now a 15.5-38% discount from their standard 2025 rates), and the Accountant operating at a 26-38% discount from their standard 2024 rates (now a 29-41% discount from their standard 2025 rates).

Based on the foregoing, the Receiver respectfully submits that the compensation sought by the Receiver and his Retained Personnel is reasonable and warranted.

VI. REQUEST FOR HOLDBACK OF RESERVE FUNDS FOR FUTURE ACTIONS TO CONCLUDE RECEIVERSHIP

Finally, as noted above and pursuant to Section VIII, Paragraph E of the Permanent Injunction, the Receiver requests the Court's approval to hold back \$200,000.00 as a reserve to cover additional fees and costs related to future actions of the Receiver and his agents to conclude the Receivership. Such future actions will consist of the Accountant's work to complete the accounting and 2025/2026 tax returns of the Receivership Entities, followed by the work of the Receiver and his agents (including the Accountants) to wind down the Receivership Entities. Due

to the anticipated timing of future work to be performed (particularly the filing of 2026 tax returns and subsequent wind down of the Receivership Entities), the Receiver requests approval to hold back the \$200,000.00 in reserve funds for up to two (2) years. The Receiver believes that this will allow him and his agents adequate time to fully conclude the Receivership and then subsequently move for the approval of a Final Fee Application upon the conclusion of all work performed by the Receiver, Law Firm, and Accountant. And if circumstances permit the Receiver to submit the Final Fee Application sooner, he will do so.

VII. CONCLUSION

WHEREFORE, the Receiver respectfully requests that the Court grant this Motion for Approval of the Fourth Interim Fee Application for the Time Period March 1, 2025 through October 31, 2025, and thereby authorize the following:

1. Payment to Clark Hill PLC in the amount of \$23,987.00, representing fees incurred for the Receiver's services performed between March 1, 2025 and October 31, 2025;
2. Payment to Clark Hill PLC in the amount of \$122,584.35, representing fees incurred for the Receiver's counsel's services performed between March 1, 2025 and October 31, 2025;
3. Payment to Clark Hill PLC in the amount of \$1,783.10, representing expenses incurred by Clark Hill PLC between March 1, 2025 and October 31, 2025;
4. Payment to Alvarez & Marsal Disputes and Investigations, LLC in the amount of in the amount of \$49,092.50, representing fees incurred for the Receiver's Accountant's services performed between March 1, 2025 and October 31, 2025; and
5. Payment to Alvarez & Marsal Disputes and Investigations, LLC in the amount of \$0.30, representing expenses incurred by the Receiver's Accountants between March 1, 2025 and October 31, 2025.

Respectfully Submitted,

Dated: November 11, 2025

s/ Robin S. Weiss
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*Attorneys for Receiver,
Kevin Dooley Kent*

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**EMPIRE HOLDING GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,**

Defendants.

Civil Action

No. 2:24-cv-04949-WB

CERTIFICATION OF RECEIVER, KEVIN DOOLEY KENT

Pursuant to 28 U.S.C. § 1746, I hereby certify as follows:


1. I, Kevin Dooley Kent, (the “Receiver” or “Applicant”), in support of the Receiver Kevin Dooley Kent’s Motion for Approval of Fourth Interim Fee Application for the Period March 1, 2025 through October 31, 2025 (“the Application”), hereby certify as follows:

- (a) I have read the Application;
- (b) To the best of my knowledge, information, and belief formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate;
- (c) All fees contained in the Application are based on the rates listed in the Applicant’s fee schedule and such fees are reasonable, necessary, and commensurate with the skill and experience for the activity performed; and
- (d) In seeking reimbursement for a service which the Applicant 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 Applicant requests reimbursement only for the amount billed to the Applicant by the third party vendor and paid by the Applicant to such vendor. With regard to any like services performed by the Receiver or his staff, the Receiver certifies that he is not making a profit on such reimbursable service.

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

Dated: 11/11/25



Kevin Dooley Kent, Receiver

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**EMPIRE HOLDINGS GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,**

Defendants.

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: **Civil Action**
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: **No. 2:24-cv-04949-WB**
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ORDER

AND NOW, this _____ day of _____ 2025, upon consideration of Receiver Kevin Dooley Kent’s Motion for Approval of Fourth Interim Fee Application for the Period March 1, 2025 through October 31, 2025, it is hereby **ORDERED** and **DECREED** that the Motion is **GRANTED**. It is **FURTHER ORDERED** as follows:

1. The Receiver’s Fourth Interim Fee Application is **APPROVED**.
2. Payment to Clark Hill PLC in the amount of \$23,987.00, representing fees incurred for the Receiver’s services performed between March 1, 2025 through October 31, 2025 is **APPROVED** and may be paid by the Receiver at this time.
3. Payment to Clark Hill PLC in the amount of \$122,584.35, representing fees incurred for the Receiver’s counsel’s services performed between March 1, 2025 through October 31, 2025 is **APPROVED** and may be paid by the Receiver at the time.
4. Payment to Clark Hill PLC in the amount of \$1,783.10, representing expenses incurred by Clark Hill PLC between March 1, 2025 through October 31, 2025 is **APPROVED** and may be paid by the Receiver at this time.

5. Payment to Alvarez & Marsal Disputes and Investigations, LLC in the amount of \$49,092.50, representing fees incurred for the Receiver's accountant's services performed between March 1, 2025 through October 31, 2025 is **APPROVED** and may be paid by the Receiver at this time.

6. Payment to Alvarez & Marsal Disputes and Investigations, LLC in the amount of \$0.30, representing expenses incurred by the Receiver's accountant between March 1, 2025 through October 31, 2025, is **APPROVED** and may be paid by the Receiver at this time.

7. The Receiver is hereby authorized to hold back \$200,000.00 in funds for up to two (2) years from the date of this Order, to serve as a reserve to cover additional fees and costs related to future actions of the Receiver and his agents to conclude the Receivership, as contemplated in Section VIII, Paragraph E of the Permanent Injunction Order (ECF No. 78).

8. Absent any timely submitted objections to the Receiver's Fifth/Final Written Status Report (ECF No. 87), and after (a) payment of the fees and expenses set forth in Paragraphs 2-6 above and (b) holding back the reserve funds pursuant to Paragraph 7 above, the Receiver shall transfer the remaining balance of funds in the Receivership Account to the Federal Trade Commission or its designated agent to reduce the monetary judgment entered in this matter, pursuant to Section VIII, Paragraph D of the Permanent Injunction Order (ECF No. 78).

BY THE COURT:

, U.S.D.J.

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDINGS GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,

Defendants.

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: Civil Action
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: No. 2:24-cv-04949-WB
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RECEIVER KEVIN DOOLEY KENT'S FOURTH WRITTEN STATUS REPORT

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Date: July 30, 2025

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I. INTRODUCTION

Following the entry of the September 20, 2024 Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief (ECF No. 19) (the “TRO Order”), Kevin Dooley Kent, in his capacity as Temporary Receiver (the “Receiver”), assumed control of Empire Holdings Group LLC d/b/a Ecommerce Empire Builders d/b/a Storefunnels.net (hereinafter “EEB”) and its existing business operations, and thereafter assumed control of/began exercising his duties with respect to nonparty entities Star Active Sports LLC (“Star Active”), Empire Partner Network LLC (“Empire Partner”), Atlas Fund Limited Partnership (“Atlas Fund”), Atlas Fund Trust (“Atlas Trust”), and Atlas Fund Land Trust (“Atlas Land”) (collectively, the “Atlas Entities”) after identifying the nonparty entities as Receivership Entities in October 2024. The TRO Order was subsequently extended by the Stipulated Preliminary Injunction entered on November 8, 2024 (the “Preliminary Injunction”) (ECF No. 49), which extended the Receiver’s duties set forth in the TRO Order.

On May 8, 2025, this Court entered the Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief (the “Permanent Injunction”) (ECF No. 78), in which the Federal Trade Commission and Defendants stipulated “to resolve all matters in dispute in this action between them.” Permanent Injunction at 1. Among other things, the Permanent Injunction formally names Empire Realty Holdings LLC (“Empire Realty”) as an additional Receivership Entity, and orders the Receiver to “take the necessary steps to wind down the businesses of the Receivership Entities, liquidate assets, and pay any net proceeds to the Commission to satisfy the monetary judgment[.]” *Id.* at 15 § VII. “In carrying out these duties,” the Permanent Injunction authorizes and directs the Receiver to, *inter alia*, “[t]ake any and all steps that the Receiver concludes are appropriate to wind down the affairs of the Receivership Entities. . . . continue to

collect, marshal, and take custody, control, and possession of all the funds, property, premises, accounts, documents, mail, and other assets of, or in the possession or under the control of the Receivership Entities, wherever situated, . . . [s]ell the nonliquidated assets of the Receivership Estate using commercially reasonable procedure without further order of the Court[.]" and "[p]erform all acts necessary or advisable to complete an accurate accounting of assets of the Receivership Estate, and prevent unauthorized transfer, withdrawal, or misapplication of said assets." *Id.* § VII ¶¶ A-B, F, L.¹

Pursuant to the Permanent Injunction and the Court's May 8, 2025 Order directing the Receiver to file "status reports on the docket beginning on July 30, 2025, and continuing every ninety (90) days thereafter, until the final resolution of this matter" (ECF No. 79), the Receiver submits this Fourth Status Report setting forth the steps the Receiver and his agents have taken/plan to take to wind down the Receivership Estate, sell the assets of the Receivership Estate, and to complete an accurate accounting of the assets of the Receivership Estate since the Receiver's Third Written Report & Third Interim Fee Application ("Third Status Report") (ECF No. 72) and entry of the Permanent Injunction. With regard to historical events that took place prior to the entry of the Permanent Injunction, the Receiver incorporates herein by reference his former status reports and fee applications.

¹ It is the Receiver's understanding that the terms of the Preliminary Injunction—specifically with regard to the Receiver's rights and obligations—remain in full effect, as the Permanent Injunction only states that it has modified "[t]he asset freeze authorized by the Stipulated Preliminary Injunction." (ECF No. 78 § V ¶ F). Indeed, the Permanent Injunction provides that while winding down the affairs of the Receivership Entities, the Receiver shall "[c]ontinue to exercise full control over the Receivership Entities[,] continue to collect, marshal, and take custody, control and possession" of assets of the Receivership Entities, and "continue to have full control over the management and personnel of the Receivership Entities." (*Id.* § VII ¶¶ A-C).

II. CONTROL, MANAGEMENT, AND SALE OF RECEIVERSHIP ASSETS

A. Receivership Bank Account

Pursuant to Section XII, Paragraph O of the TRO Order and Section XIII, Paragraph O of the Permanent Injunction, the Receiver has continued to maintain a centralized Receivership Account with WSFS Bank (the “Receivership Account”), through which he has continued to receive the transfer of funds and has made payments and disbursements as necessary for the administration of the Receivership Estate. As of July 25, 2025, the balance in the Receivership Account was \$671,150.10.

The Receiver secured the transfer of funds from Stripe (\$39,720.25) to the Receivership Account, that Stripe failed to turn over to the Receiver until the Court ordered it to do so. (*See* ECF No. 81). Pursuant to the Court’s June 12, 2025 Order (*see* ECF No. 83), Stripe also turned over \$2,994.30 in attorney fees to the Receiver that his counsel accrued in connection with his Motion to Enforce Stripe’s compliance with turning over the aforementioned funds to the Receivership Account. Additionally, as discussed in further detail in Section II.C.4, *infra*, the Receiver secured the full payment of funds (\$145,010.00) from the sale of the contents of Defendants’ safe deposit box and four Rolex watches pursuant to Section IV, Table 1 of the Permanent Injunction. (*See* ECF No. 78 § IV ¶¶ C-D). The Receiver also continues to make payments and disbursements from the Receivership Account as necessary or advisable to carry out his duties, in accordance with the Permanent Injunction. (*See id.* § IV ¶ H).

The wire and transfer activity for the Receivership Account is set forth in greater detail in Section V, *infra*.

B. Empire Partner Assets

1. TD Bank Account

The Empire Partner TD Bank Account (x8811) has continued to receive funds since the transfer of the balance of that account to the Receivership Account. As of July 25, 2025, the balance in the account was \$4,221.51. The Receiver intends to arrange for the transfer of these funds to the Receivership Account.

2. PayPal Account

As of July 25, 2025, the balance in Empire Partner's PayPal account was \$216.45.

C. Empire Realty Assets

1. Constitution Ave Property

Empire Realty owns a townhome located at 6 Constitution Avenue, Doylestown, PA 18901 (the "Constitution Ave Property"). Peter Prusinowski turned over the keys to the Constitution Ave Property to the Receiver as directed by the Permanent Injunction.

As of July 30, 2025, the mortgage balance for the Constitution Ave Property, held by Mr. Cooper, is \$108,484.39. The Receiver continues to pay the monthly mortgage on the Constitution Ave Property, which is \$1,186.08 per month. The Receiver also continues to pay HOA fees (\$144.95 per month) and water and sewer bills for the Constitution Ave Property. *See* Section V.B, *infra*.

The previous insurance policy for the Constitution Ave Property was in Peter Prusinowski's name and expired on July 15, 2025. Accordingly, the Receiver secured a new insurance policy through Foremost Insurance, with a total one-year premium of \$7,069.00, to be paid out of the mortgage escrow account. Additionally, the Receiver requested and obtained the 2025 Real Estate Tax Bill from the Doylestown Township Tax Collector totaling \$3,054.10, which he likewise submitted to the mortgage company for payment out of escrow.

After receiving complaints from the HOA regarding lawn maintenance, and to ensure the Constitution Ave Property remains in presentable condition, the Receiver solicited quotes from several local landscaping companies for grass cutting services and ultimately entered into a maintenance agreement with Nickett Landscaping. Nickett Landscaping is providing mowing and general lawn maintenance services for the Constitution Ave Property at a cost of \$29.50 per week (plus tax). On July 28, 2025, Nickett invoiced the Receiver \$126.08 for its services to date.

Additionally, as previewed in the Receiver's Third Status Report, the Receiver agreed to return half of the security deposit (\$1,175.00) to the previous tenant of the Constitution Ave Property. On April 15, 2025, following the tenant's execution of a letter acknowledging the agreement reached as to the amount to be returned to him and releasing any claims against the Receiver, the Receivership Entities, and Peter and Kellie Prusinowski with regard to any disputes arising from or relating to the Lease Agreement, the Receiver mailed a check for \$1,175.00 to the tenant, of which he confirmed receipt two days later.

Meanwhile, the Receiver is preparing to sell the Constitution Ave. Property, and has selected a realtor. On July 25, 2025, the Receiver filed a Motion for Approval of Stipulated Order Regarding the Receiver's Sale of Real Property (ECF No. 84), which the Court approved and entered on July 28, 2025 (ECF No. 85). The Receiver is now taking steps to initiate the sales process in earnest.

2. TD Bank Account

In addition to the Constitution Ave Property, Empire Realty holds a bank account with TD Bank. As of July 25, 2025, there was a balance of \$5,937.79 in Empire Realty's TD Bank Account (x8762). The Receiver intends to arrange for the transfer of these funds to the Receivership Account.

D. Storefunnels Stripe Account

As previously reported, the Storefunnels Stripe Account continued to collect Storefunnels subscription payments for individuals who had active websites on Storefunnels. Stripe paused payouts on the account pursuant to the TRO Order and Stipulated PI, but in accordance with discussions between Stripe's counsel and the Receiver's counsel, Stripe allowed the Storefunnels subscription payments to continue to process and accrue in the Storefunnels Stripe account.

In accordance with plans discussed in the Second Written Report & Second Interim Fee Application, after Storefunnels was shut down on January 31, 2025, the Receiver's counsel contacted Stripe's counsel requesting that Stripe transfer the accrued funds in the Storefunnels Stripe account to the Receivership Account. And as discussed in the Third Status Report, Receiver's counsel sent numerous follow-up requests to Stripe's counsel on the status of the transfer request, but Stripe never confirmed that it would transfer the accrued funds or that it had initiated the transfer. (*See* ECF No. 72 at 9-10, 15-16). Accordingly, on May 30, 2025, the Receiver filed a Motion to Enforce Stripe's Compliance with the Preliminary Injunction and Permanent Injunction, requesting that the Court order Stripe to transfer the balance of the Storefunnels Stripe Account (\$39,720.25) to the Receivership Account or Stripe would be subject to a contempt citation. (ECF No. 80). On June 4, 2025, this Court granted the Receiver's Motion and ordered Stripe to transfer the funds to the Receiver within 10 days. (*See* ECF No. 81). Counsel for Stripe confirmed the initiation of the transfer within the 10-day timeframe, and on June 16, 2025, the funds were received into the Receivership Account.

The Receiver's Motion to Enforce Stripe's Compliance with the Preliminary Injunction and Permanent Injunction also included a request that Stripe pay attorney fees to the Receiver for the Receiver's counsel's time spent in connection with the Motion, which the Court granted on June 12, 2025 following Receiver's counsel's submission of a Declaration evidencing the time

spent and costs incurred in connection with the Motion (totaling \$2,994.30). (See ECF Nos. 82-83). Counsel for Stripe subsequently initiated the transfer of \$2,994.30 in attorney fees and, on July 3, 2025, the funds were received into the Receivership Account.

E. Safe Deposit Box

As previously reported, the Receiver took possession of the keys to the Safe Deposit Box located at the TD Bank in Jamison, Pennsylvania, and inventoried the contents thereof, which included assets such as Rolex watches, gold and silver bullion, and gold and silver coins.

Pursuant to Section IV, Paragraphs C-D of the Permanent Injunction, on May 19, 2025, the Receiver, Mr. Prusinowski, and Michael Leven, an appraiser from Bucks County Rare Coin & Precious Metals LLC (“Bucks County Rare Coin”), met at the TD Bank in Jamison, Pennsylvania to have the contents of the safe deposit box appraised in order for the Receiver to determine the total value of all contents therein, and to determine which items totaled to \$10,000.00 (that Mr. Prusinowski could keep pursuant to Table 1 of the Permanent Injunction). Mr. Leven appraised each item in the safe deposit box, which collectively totaled \$155,000.00.² Mr. Prusinowski was permitted to keep three \$20 UNC Detail Saint Gold Bars, three 10oz 999 Silver Bars, and six 1oz 999 Silver Bars, which were collectively valued at \$9,990.00. The Receiver sold the rest of the items, totaling \$145,010.00, to Bucks County Rare Coin. Bucks County Rare Coin made half of this payment in person via check, and paid the balance by wire transfer to the Receivership Account two days later.

² This total includes the appraisal of the four Rolex watches that are also listed in Table 1 of the Permanent Injunction. One of the four Rolexes was in the safe deposit box, and the other three Mr. Prusinowski brought to TD Bank to surrender to the Receiver. The appraisal for the four Rolexes collectively totaled \$18,000.00.

III. MANAGEMENT, ANALYSIS, AND SHUTDOWN OF EEB BUSINESS OPERATIONS

The Receiver provided significant detail about his management, analysis, and shutdown of EEB Business Operations in his prior written reports and fee applications. To the extent certain wind-down actions were already reported and completed, they will not be repeated here. Instead, the Receiver incorporates his prior written reports and fee applications in this regard.

A. EEB Social Media Accounts and Website Domains

In his First Written Report and previous interim fee applications submitted to the Court, the Receiver detailed the efforts he and his agents had taken to gain control over, preserve, and deactivate EEB's social media accounts. (*See* ECF No. 38 at 18-20; ECF No. 54 at 25-26, 47-48). The Receiver has also previously reported the steps he and his agents have taken to post a notice on EEB website domains about the instant action and the receivership, as well as renewing website domain subscriptions. (*See* ECF No. 54 at 35-36; ECF No. 72 at 20-21). Those discussions are incorporated herein by reference. The Receiver is currently evaluating his options with regard to the potential shutdown of Empire's social media accounts and website. This includes the possibility of selling the website domains, including <https://ecommerceempirebuilders.com/> and <https://empireplr.com>.

B. Receivership Website

The Receiver continues to update the Receivership Website to provide updates regarding important developments to consumers and members of the public.

C. Accounting and Tax-Related Matters

A&M is continuing to provide tax-related services for the Receivership Entities on a going-forward basis. A&M will be preparing 2024 and 2025 tax returns for the Receivership Entities,

where applicable, and will ultimately assist the Receiver with the ultimate wind-down of these entities.

D. EEB's 401K Plan

Brad Barlow of Barlow Consulting, Inc. has historically served as the Third-Party Administrator for EEB's 401K Plan ("the Plan") and prepared the annual 5500 EZ's for the Plan at a rate of \$450.00 per year. Mr. Barlow was never paid for his services for 2022 and 2023, and was owed \$900.00 by EEB.

After speaking with Mr. Barlow, the Receiver determined that it was most prudent for the Receivership Estate to bring the Plan account with Barlow Consulting up-to-date, so he would be willing to perform further work, and to engage Mr. Barlow to both prepare the 2024 and 2025 5500 EZ's and shut down the Plan. The Receiver paid Mr. Barlow a total of \$1,900.00 for his services, consisting of \$450.00 per year of 401K Plan Administration (2022 through 2025), and \$100.00 for termination of the Plan.

IV. NON-CONSUMER CREDITOR CLAIMS

As noted in the Receiver's Third Status Report (ECF No. 72), the Receiver identified potential liabilities related to potential claims of creditors in connection with losses incurred by, *inter alia*, payment processors through the processing of customer chargebacks, AMEX through the non-payment of credit card bills, former service providers with outstanding balances, and former EEB contractors seeking payment for work performed prior to the entry of the TRO Order and appointment of the Receiver. In this regard—and because several of these creditors had inquired into whether there would be a claims process through which they could submit claims, the Receiver and his counsel conferred with counsel for the FTC, and established a non-consumer

creditor claims process in which entities and individuals who claim they are owed payments by the Receivership Entities were given the opportunity to submit a claim for repayment.³

On May 16, 2025, the Receiver and his agents issued a Non-Consumer Creditor Notice of Claims Procedure and Claims Bar Date, with a claim form, to every non-consumer creditor known to the Receiver that may have a potential claim against the Receivership Estate.⁴ The Receiver also posted a copy of the Notice and claim form on the Receivership Website. The Notice advised claimants to complete and return the claim form with any supporting documentation to the Receiver by the Claims Bar Date of June 16, 2025, if they believed they are owed money from the Receivership Entities. The Notice further advised that the Receiver would review all timely submitted claims and notify claimants within thirty (30) days as to whether the Receiver accepts or rejects the claim. Additionally, the Notice informed recipients that an acceptance of their claim would *not* be a guarantee that any distributions of the Receivership Estate would be made to them; rather, it would only serve as an acknowledgment of the existence and amount of their claim, and that the Receiver would identify the existence and amount of all known claims in his Final Report that will be submitted to the Court in accordance with Section VIII of the Permanent Injunction. Finally, the Notice advised that, pursuant to Section VIII, Paragraph B of the Permanent Injunction, the Receiver will mail copies of the Final Report with a notice informing claimants that they may file objections with the Court as to the payment of any assets of the Receivership Entities

³ Because the Receiver understands that the FTC historically handles consumer redress, the claims process that the Receiver and his counsel established is exclusively for any entity/individual that was *not* an EEB customer and that claims it is owed payment by any of the Receivership Entities.

⁴ Specifically, notice was sent out to the following entities/individuals: American Express, PayPal, Stripe Inc., Wave, Morana Enterprises LLC/Paul Morana, Ads with Finesse/Travis Bryant, Closer Secrets, Swiat LLC/Steve Swiat, Empire Tax Advisors/Angela Smith, Network Merchants LLC (NMI), Cedars Business Services LLC, Ecommerce 4 Team, Authorize.net, Landry and Jacobs LLC, American Coriadus International LLC, Creditors Adjustment Bureau, Khalid Angelo Manalundong, Rubeena Kousar, Sheldon Garwood, Ali Akbar Hussain Gulsan, Tareq Alrefae, Ruben Hernandez, Arianne Franco, Ruby Gull, Laraib Ahmed Siddiqui, Muhannad Adeel Iqbal, Kasib Kamil, Abdul Ghaffar, Muhammad Arsalan, Jijo William Nadar, Haya Kamil, Owais Ali Awan, Nadine Chu, and Nicole Thea Ferraren.

to satisfy the Receiver's costs and expenses and the monetary judgment within 28 days from the date of the mailing of the Final Report, and absent a valid objection, Section VIII, Paragraph D of the Permanent Injunction directs the Court to "(1) [p]ay the reasonable costs and expenses of administering the Receivership, including compensation of the Receiver and the Receiver's personnel . . . and the actual out-of-pocket costs incurred by the Receiver in carrying out his duties; [and] (2) [p]ay all remaining funds to the Commission or its designated agent to reduce the monetary judgment of [\$9,786,124.61]."

The Receiver received timely submitted claims from American Express and two former EEB contractors, Paul Morana/Morana Enterprises LLC⁵ and Jijo William Nadar.⁶ On July 1, 2025, the Receiver notified each of the three claimants as to his determination of their claims. Specifically, the Receiver acknowledged and accepted: (1) a total of \$143,165.00 in submitted claims from American Express, consisting of separate claims submitted for each of the seven Amex business credit cards that were used in connection with EEB's business operations, for charges incurred up to the date of the entry of the TRO;⁷ (2) the claim for \$1,100.00 submitted by Mr. Morana/Morana Enterprises, for outstanding payment for services performed prior to the entry of the TRO and Asset Freeze; and (3) the claim for \$7,947.12 submitted by Mr. Nadar, for outstanding payments for services performed prior to the entry of the TRO and Asset Freeze. In confirming their claims, the Receiver reiterated that his acceptance of the claims only serves as an acknowledgement of the existence and amount of the claims, is *not* a guarantee that any

⁵ Paul Morana was one of four former EEB 1099 contractors, and he specifically handled automation. (*See* ECF No. 38 at 21 n.20). Mr. Morana submitted a claim on behalf of himself and his entity, Morana Enterprises LLC, as his compensation was paid directly to his entity.

⁶ Jijo William Nadar was one of EEB's back-office personnel and was one of two people that was specifically in charge of assisting EEB customers with placing the customers' advertisements, primarily on Facebook and Instagram, with the goal of bringing in orders for the customers.

⁷ The Receiver rejected portions of AMEX's claim for charges that post-dated the entry of the TRO.

distributions will be made to the claimants, and is not binding on the Court or the parties to the case. Pursuant to Section VIII of the Permanent Injunction, the Receiver will serve these claimants with his Final Report and notify them that they have 28 days to file objections to the distribution of funds to (1) pay the costs and expenses of administering the Receivership Estate (including compensation and expense reimbursement for the Receiver and his personnel), and then (2) pay all remaining funds to the FTC to reduce the monetary judgment award entered against Defendants in this action.

V. ASSETS, EXPENSES, AND LIABILITIES OF THE RECEIVERSHIP ESTATE

A. Assets

As of July 25, 2025, the balance in the Receivership Account was \$671,150.10. This balance is the result of the wire and transfer activity set forth below.

Between the close of the Third Reporting Period (February 28, 2025) and July 25, 2025 (the “Fourth Reporting Period”), the Receivership Account has received: (a) \$145,010.00 from the sale of the Rolex watches, coins, and other items in the safe deposit box pursuant to the Permanent Injunction, divided between two equal payments on 5/19/25 and 5/21/25; (b) \$100.00 on 6/12/25 for a safety deposit box refund from TD Bank; (c) \$39,720.25 from Stripe on 6/16/25, representing the balance in the Storefunnels Stripe Account; and (d) \$2,994.30 in attorney fees from Stripe on 7/7/25, awarded in connection with the Receiver’s Motion to Enforce Stripe’s compliance with turning over the Storefunnels Stripe Account balance to the Receivership Account.

Additional assets/potential assets include: (a) the balance in the Empire Partner TD Bank Account (\$4,221.51 as of 7/25/25); (b) the balance in Empire Partner’s PayPal account (\$216.45

as of 7/25/25); (c) the balance in Empire Realty's TD Bank Account (\$5,937.79 as of 7/25/25); and (d) the Constitution Ave Property, less what is owed on the mortgage.⁸

B. Expenses

Administrative expenses for the Fourth Reporting Period total \$101,413.79. The Receiver paid the following in professional fees and expense reimbursements on May 12, 2025, in connection with the Court's approval of the Receiver's Third Interim Fee Application (ECF No. 76): (a) \$5,274.25 to Clark Hill PLC for professional fees incurred by the Receiver; (b) \$45,068.85 to Clark Hill PLC for professional fees incurred by the Receiver's counsel; (c) \$786.25 to Clark Hill PLC for expenses incurred by the Receiver's counsel; (d) \$37,846.50 to A&M for professional fees incurred by them in their role as the Receiver's accountants; and (e) \$27.48 to A&M for expenses incurred by the Receiver's accountants.

Additional administrative expenses during the Fourth Reporting Period include the following: (a) \$38.84 in total payments to GoDaddy for domain/email address renewals (four payments of \$9.71 made on 3/3/25, 3/18/25, 4/22/25, and 4/23/25); (b) \$1,175.00 paid to the prior tenant of the Constitution Ave Property on 4/14/25, in resolution of the dispute over his Security Deposit; (c) \$150.00 paid to TD Bank on 5/2/25 for the safe deposit box (\$100 of which was subsequently returned following the closure of the safe deposit box); (d) \$1,900.00 paid to Barlow Consulting on 7/10/25, for EEB's 401K Plan Administration and Termination; (e) \$688.25 in total payments to WSFS for various bank fees; (f) \$7,189.10 in total mortgage payments for the Constitution Ave Property; (g) \$143.06 in total water bills paid to North Wales Water Authority for the Constitution Ave Property; (h) \$219.46 in total sewer bills paid to Bucks County Water and

⁸ While the Receiver previously identified a potential \$95,000 shareholder loan as an asset in the Receiver's Accounting (ECF No. 53), the Receiver's Accountant has been unable to locate any support for this loan balance outside of Quickbooks. Based on information currently available, the Receiver's Accountant anticipates reclassifying this loan as an equity distribution for tax purposes.

Sewer Authority for the Constitution Ave Property; and (i) \$906.75 in total HOA payments for the Constitution Ave Property.

C. Potential Liabilities (Non-Consumer Creditor Claims)

The Receivership Estate’s potential liabilities are with respect to non-consumer creditor claim submissions and total \$152,212.12, broken down as follows: (1) \$143,165.00 in total claims submitted by American Express, representing charges incurred on seven EEB business credit cards up to the date of the entry of the TRO; (2) a \$1,100.00 claim submitted by Paul Morana/Morana Enterprises, representing outstanding payment for services performed prior to the entry of the TRO; and (3) a \$7,947.12 claim submitted by Jijo William Nadar, representing outstanding payments for services performed prior to the entry of the TRO.

VI. CONCLUSION

In summary, the Receiver will continue to take steps to wind down and dissolve the Receivership Estate pursuant to his duties set forth in Section VII of the Permanent Injunction.

Respectfully Submitted,

Dated: July 30, 2025

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDING GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,

Defendants.

Civil Action

No. 2:24-cv-04949-WB

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the Receiver Kevin Dooley Kent's Fourth Written Status Report was filed and served on all counsel of record via the Court's Electronic Filing System pursuant to Fed. R. Civ. P. 5(b).

Dated: July 30, 2025

s/ Robin S. Weiss _____
Robin S. Weiss, Esq.
Attorney for Receiver, Kevin Dooley Kent

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDINGS GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,

Defendants.

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: Civil Action
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RECEIVER KEVIN DOOLEY KENT'S FIFTH/FINAL WRITTEN STATUS REPORT

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Date: October 28, 2025

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I. INTRODUCTION

Following the entry of the September 20, 2024 Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief (ECF No. 19) (the “TRO Order”), Kevin Dooley Kent, in his capacity as Temporary Receiver (the “Receiver”), assumed control of Empire Holdings Group LLC d/b/a Ecommerce Empire Builders d/b/a Storefunnels.net (hereinafter “EEB”) and its existing business operations, and thereafter assumed control of/began exercising his duties with respect to nonparty entities Star Active Sports LLC (“Star Active”), Empire Partner Network LLC (“Empire Partner”), Atlas Fund Limited Partnership (“Atlas Fund”), Atlas Fund Trust (“Atlas Trust”), and Atlas Fund Land Trust (“Atlas Land”) (collectively, the “Atlas Entities”) after identifying the nonparty entities as Receivership Entities in October 2024. The TRO Order was subsequently extended by the Stipulated Preliminary Injunction entered on November 8, 2024 (the “Preliminary Injunction”) (ECF No. 49), which extended the Receiver’s duties set forth in the TRO Order.

On May 8, 2025, this Court entered the Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief (the “Permanent Injunction”) (ECF No. 78), in which the Federal Trade Commission and Defendants stipulated “to resolve all matters in dispute in this action between them.” Permanent Injunction at 1. Among other things, the Permanent Injunction formally names Empire Realty Holdings LLC (“Empire Realty”) as an additional Receivership Entity, and orders the Receiver to “take the necessary steps to wind down the businesses of the Receivership Entities, liquidate assets, and pay any net proceeds to the Commission to satisfy the monetary judgment[.]” *Id.* at 15 § VII. “In carrying out these duties,” the Permanent Injunction authorizes and directs the Receiver to, *inter alia*, “[t]ake any and all steps that the Receiver concludes are appropriate to wind down the affairs of the Receivership Entities. . . . continue to

collect, marshal, and take custody, control, and possession of all the funds, property, premises, accounts, documents, mail, and other assets of, or in the possession or under the control of the Receivership Entities, wherever situated, . . . [s]ell the nonliquidated assets of the Receivership Estate using commercially reasonable procedure without further order of the Court[.]" and "[p]erform all acts necessary or advisable to complete an accurate accounting of assets of the Receivership Estate, and prevent unauthorized transfer, withdrawal, or misapplication of said assets." *Id.* § VII ¶¶ A-B, F, L.¹

Pursuant to Section VIII of the Permanent Injunction,² the Receiver now submits this Fifth and Final Status Report (the "Final Report"), setting forth (1) "the steps taken to dissolve the Receivership Estate"; (2) "an accounting of the Receivership Estate's finances and total assets"; and (3) "a description of what other actions, if any, must be taken to wind down the Receivership." *Id.* § VIII ¶ A. The Receiver additionally anticipates requesting a hold back of funds with his upcoming Fourth Interim Fee Application as a reserve to cover additional fees and costs related to future actions of the Receiver and his agents to conclude the Receivership. Regarding historical events that have taken place prior to the filing of the Receiver's Fourth Status Report (ECF No. 86), the Receiver incorporates herein by reference all former status reports and fee applications.

¹ It is the Receiver's understanding that the terms of the Preliminary Injunction—specifically with regard to the Receiver's rights and obligations—remain in full effect, as the Permanent Injunction only states that it has modified "[t]he asset freeze authorized by the Stipulated Preliminary Injunction." ECF No. 78 § V ¶ F. Indeed, the Permanent Injunction provides that while winding down the affairs of the Receivership Entities, the Receiver shall "[c]ontinue to exercise full control over the Receivership Entities[,] continue to collect, marshal, and take custody, control and possession" of assets of the Receivership Entities, and "continue to have full control over the management and personnel of the Receivership Entities." *Id.* § VII ¶¶ A-C.

² Following the entry of the Permanent Injunction, the Court subsequently entered a separate Order directing the Receiver to file "status reports on the docket beginning on July 30, 2025, and continuing every ninety (90) days thereafter, until the final resolution of this matter." ECF No. 79. The terms of the Permanent Injunction require the Receiver to set forth "a description of what other actions, if any, must be taken to wind down the Receivership" within this Final Report. The Receiver thus anticipates filing future status reports addressing only these additional wind-up matters. In accordance with Section VIII, Paragraph C of the Permanent Injunction, the Receiver will be filing a Fourth Interim Fee Application within 14 days from the submission of this Final Report, and also plans to file a supplemental fee application with the Court's approval (*see* Permanent Injunction § VIII ¶ E).

II. CONTROL, MANAGEMENT, AND SALE OF RECEIVERSHIP ASSETS

A. Receivership Bank Account

Pursuant to Section XII, Paragraph O of the TRO Order and Section XIII, Paragraph O of the Permanent Injunction, the Receiver has continued to maintain a centralized Receivership Account with WSFS Bank (the “Receivership Account”), through which he has continued to receive the transfer of funds and has made payments and disbursements as necessary for the administration of the Receivership Estate. As of October 24, 2025, the balance in the Receivership Account was \$668,653.10. The wire and transfer activity for the Receivership Account is set forth in greater detail in Section V, *infra*.

B. Empire Partner Assets

1. TD Bank Account

The Empire Partner TD Bank Account (x8811) continued to receive nominal funds since the transfer of the balance of that account to the Receivership Account. As of September 22, 2025, the balance in the account was \$4,227.19. In early September, the Receiver requested that TD Bank close the account and transfer the balance of the account to the Receivership Account. On September 25, 2025, TD Bank closed the account and, on October 17, 2025, TD Bank mailed a check to the Receiver in the amount of \$4,227.19 (the account balance upon closure). The check was deposited into the Receivership Account on October 22, 2025.

2. PayPal Account

As reported in the Fourth Status Report, the balance in Empire Partner’s PayPal account was \$216.45. Receiver’s counsel contacted PayPal’s counsel requesting that PayPal transfer the account balance to the Receivership Account. On October 28, 2025, PayPal’s counsel advised that a check for the account balance (now \$216.74) was mailed to the Receiver on October 9. As of the date of this filing, the check has not yet been received. In the event the check is not received,

Receiver's counsel will continue with limited efforts to work with PayPal's counsel to collect the Empire Partner PayPal account balance.

C. Empire Realty Assets

1. Constitution Ave Property

Empire Realty owns a townhome located at 6 Constitution Avenue, Doylestown, PA 18901 (the "Constitution Ave Property"). Peter Prusinowski turned over the keys to the Constitution Ave Property to the Receiver as directed by the Permanent Injunction.

As reported in the Receiver's Fourth Status Report, the Receiver secured an insurance policy for the Constitution Ave Property through Foremost Insurance, following the July 15, 2025 expiration of the prior insurance policy that was in Peter Prusinowski's name. The Receiver's insurance policy has a total one-year premium of \$7,069.00 that is to be paid out of the mortgage escrow account. The Receiver also requested and obtained the 2025 Real Estate Tax Bill from the Doylestown Township Tax Collector totaling \$3,054.10, which he likewise submitted to the mortgage company for payment out of escrow. Additionally, after receiving complaints from the HOA regarding lawn maintenance, and to ensure the Constitution Ave Property remains in presentable condition, the Receiver entered into a maintenance agreement with Nickett Landscaping to provide mowing and general lawn maintenance services for the Constitution Ave Property at a cost of \$29.50 per week (plus tax). Nickett has invoiced the Receiver a total of \$284.84 for its services to date.

As of October 24, 2025, the mortgage balance for the Constitution Ave Property, held by Mr. Cooper, is \$107,319.28. The Receiver continues to pay the monthly mortgage on the Constitution Ave Property, which recently increased from \$1,186.08 per month to \$2,222.34 to account for additional insurance and tax costs and replenishing the escrow account. The Receiver also continues to pay HOA fees (\$144.95 per month) and water and sewer bills for the Constitution

Ave Property. *See* Section V.B, *infra*. On October 27, 2025, Mr. Cooper advised that the mortgage payoff amount (including escrow advances of \$2,412.12) is \$110,303.81, which is good through November 12, 2025.

Meanwhile, the sale process is underway for the Constitution Ave. Property. On July 25, 2025, the Receiver filed a Motion for Approval of Stipulated Order Regarding the Receiver's Sale of Real Property (ECF No. 84), which the Court approved and entered on July 28, 2025 (ECF No. 85). The Receiver thereafter engaged Julie Short of Berkshire Hathaway HomeServices Fox & Roach as his agent ("Seller's Agent") to list and sell the Constitution Ave Property via private sale, at five percent (5%) commission, to be split equally between the Seller's Agent and Buyer's Agent.

The Seller's Agent toured the Constitution Ave Property and provided recommendations regarding minor improvements to be made to optimize resale value and salability. The Receiver promptly proceeded with certain minor cosmetic improvements per the Seller's Agent's recommendations, including replacing the upstairs carpets, repairing broken kitchen cabinets, repairing and re-painting upstairs doors and trim, replacing a broken light fixture, power washing the back yard patio and siding, replacing rotted trim around the back sliding door, and having the property deep cleaned. The carpet removal and installation was performed by Olden Carpet & Flooring at a cost of \$1,995.00, and the remainder of the work was performed by DConstruct DiSigns LLC, both of whom provided competitive quotes for performance of the requested work. The Receiver and his counsel handled the initial decision-making regarding repairs, and the repairs were then coordinated and overseen by non-billing support staff from the Receiver's Law Firm.

After home repairs were completed, the Seller's Agent arranged for listing photographs to be taken. The Seller's Agent recommended a listing price of \$365,000.00 based upon comparable recently sold homes in the neighborhood. The listing went live on September 28, 2025. Seven (7)

showings took place within the first week of listing, and two offers were received. Ultimately, the Receiver proceeded with the more competitive cash offer of \$356,000.00. The buyer waived inspections. The sale is scheduled to close on November 5, 2025, at Keller Williams in Doylestown, PA.

2. TD Bank Account

In addition to the Constitution Ave Property, Empire Realty held a bank account with TD Bank (x8762). As of September 25, 2025, the balance in the account was \$5,937.79. On September 25, 2025, at the Receiver's request, TD Bank closed the account and mailed a check to the Receiver in the amount of \$5,937.79 (the account balance upon closure). The check was deposited into the Receivership Account on October 7, 2025.

III. MANAGEMENT, ANALYSIS, AND SHUTDOWN OF EEB BUSINESS OPERATIONS

The Receiver provided significant detail about his management, analysis, and shutdown of EEB Business Operations in his prior written reports and fee applications. To the extent certain wind-down actions were already reported and completed, they will not be repeated here. Instead, the Receiver incorporates his prior written reports and fee applications in this regard.

A. EEB Social Media Accounts and Website Domains

In his First Written Report and previous interim fee applications submitted to the Court, the Receiver detailed the efforts he and his agents had taken to gain control over, preserve, and deactivate EEB's social media accounts (Instagram, YouTube, Facebook, TikTok, and Spreaker). *See* ECF No. 38 at 18-20; ECF No. 54 at 25-26, 47-48. The Receiver has also previously reported the steps he and his agents have taken to post a notice on EEB website domains about the instant action and the receivership, as well as renewing website domain subscriptions. *See* ECF No. 54 at 35-36; ECF No. 72 at 20-21. Those discussions are incorporated herein by reference.

On October 6, 2025, the Receiver notified the FTC and defense counsel that he and his agents planned to permanently shut down and/or delete EEB's social media accounts as part of his duties to "wind down the affairs of the Receivership Entities" pursuant to Section VII, Paragraph A of the Permanent Injunction, and to let the Receiver know no later than October 8 of any questions or concerns regarding the shutdown plan. After receiving no such questions or concerns from the parties, the Receiver's agents proceeded with the shutdown plan. The details of the Receiver's agents' efforts to shut down each social media account are as follows:

- Instagram (@ecommerce.empire.builders): The Receiver's agents permanently deleted this account on October 14, 2025. Deletion of this account required Peter Prusinowski's assistance, as login authentication codes were sent to Mr. Prusinowski's cellphone.
- YouTube (@ecommerce.empire.builders): The Receiver's agents permanently deleted this account on October 27, 2025. Deletion of this account required Mr. Prusinowski's assistance, as login authentication codes were sent to Mr. Prusinowski's cellphone.
- Facebook (@Ecommerce Empire Builders): The Receiver's agents have not yet been able to delete this Facebook page. As reported in prior status reports, this is not a standalone "account" but rather a Facebook page run and operated by EEB personnel through their own individual Facebook accounts, therefore the Receiver's agents oversaw James Zeller, the individual who had full administrative control over the page, deactivate the page in October 2024. *See* ECF No. 54 at 26 n.17, 28-29, 48. The Receiver's agents reached out to Mr. Zeller on October 13, 2025, requesting his assistance with permanently deleting the Facebook page, and followed up again on October 22 after not having received any response. To date, Mr. Zeller has not responded. The Receiver's agents will continue to reach out to Mr. Zeller; if Mr. Zeller does not respond, the Receiver notes that the Facebook page has been deactivated since October 2024 and has not been accessible to the public since then.
- X/Twitter (@OffPetterPru): The Receiver's agents permanently deleted this account on October 27, 2025. Deletion of this account required Peter Prusinowski's assistance, as login authentication codes were sent to Mr. Prusinowski's cellphone.
- TikTok (@ecomm.empire.builders): The Receiver's agents have not been able to log into the TikTok account because login authentication codes only are sent to peter@ecommerceempirebuilders.com, which the Receiver no longer has access to. While the Receiver's agents temporarily renewed the subscriptions for peter@ecommerceempirebuilders.com and its associated website domain, ecommerceempirebuilders.com, in an attempt to re-access the email to obtain the TikTok login authentication code, the email address does not appear to receive any

emails and thus such attempts have not been successful. The Receiver's agents are now attempting to troubleshoot these issues directly with TikTok support.

- Spreaker (Ecommerce Empire Builders Podcast): The Receiver's agents permanently deleted this account on October 13, 2025.

As for Empire's website domains, the domain <https://ecommerceempirebuilders.com/> was temporarily renewed as part of the Receiver's agent's efforts to shut down the social media accounts, as noted above; however, the website is not publicly accessible because a pop-up from the website operator (Clickfunnels) was put in place in response to notification of the TRO and Stipulated PI, which prevents access to the website altogether. As for the domain <https://empireplr.com>, the domain has expired and thus the former, alternative EEB website no longer exists; the domain now only displays a miscellaneous landing page. Accordingly, the Receiver does not plan to take any further action with regard to the website domains.

B. Receivership Website

The Receiver continues to update the Receivership Website to provide updates regarding important developments to consumers and members of the public. The Receiver plans to maintain and continue to post updates to the Receivership Website through the date of the final payment of all Receivership Assets to the FTC.

C. Accounting and Tax-Related Matters

A&M is continuing to provide tax-related services for the Receivership Entities on a going-forward basis. On September 15, 2025, the Receiver signed, and A&M subsequently submitted, the 2024 tax returns for EEB and Atlas Fund.³ A&M will be preparing 2025 tax returns for the

³ A&M has confirmed that tax returns only need to be filed for EEB and Atlas Fund. Empire Partner has been, and will continue to be, filed with Peter Prusinowski's personal tax returns. Empire Realty is encompassed within Atlas Fund's tax returns because Atlas Fund is Empire Realty's sole member and Empire Realty is considered a disregarded entity under Atlas Fund; therefore, Atlas Fund is viewed as directly owning Empire Realty's assets. A&M has advised that the remaining Receivership Entities (Atlas Trust, Atlas Land, and Star Active) need not file tax returns.

Receivership Entities, where applicable, and will ultimately assist the Receiver with the ultimate wind-down of these entities.

D. EEB's 401K Plan

Brad Barlow of Barlow Consulting, Inc. has historically served as the Third-Party Administrator for EEB's 401K Plan ("the Plan") and prepared the annual 5500 EZ's for the Plan at a rate of \$450.00 per year. Mr. Barlow was never paid for his services for 2022 or 2023 and was owed \$900.00 by EEB. As reported in the Fourth Status Report, the Receiver engaged Mr. Barlow to both prepare the 2024 and 2025 5500 EZ's and shut down the Plan and, in accordance therewith, paid Mr. Barlow a total of \$1,900.00 for his services (\$450.00 per year of 401K Plan Administration (2022 through 2025), and \$100.00 for termination of the Plan).

Mr. Barlow subsequently prepared all necessary documentation, which the Receiver signed on July 20, 2025. On July 31, 2025, Mr. Barlow forwarded to the Receiver confirmation that the 2025 5500 EZ had been electronically filed. Receiver's counsel subsequently forwarded all executed documentation to Peter Prusinowski and his counsel for their records.

IV. NON-CONSUMER CREDITOR CLAIMS

As noted in the Receiver's Third Status Report (ECF No. 72), the Receiver identified potential liabilities related to potential claims of creditors in connection with losses incurred by, *inter alia*, payment processors through the processing of customer chargebacks, AMEX through the non-payment of credit card bills, former service providers with outstanding balances, and former EEB contractors seeking payment for work performed prior to the entry of the TRO Order and appointment of the Receiver. In this regard—and because several of these creditors had inquired into whether there would be a claims process through which they could submit claims, the Receiver and his counsel conferred with counsel for the FTC, and established a non-consumer

creditor claims process in which entities and individuals who claim they are owed payments by the Receivership Entities were given the opportunity to submit a claim for repayment.⁴

As reported in the Fourth Status Report, on May 16, 2025, the Receiver and his agents issued a Non-Consumer Creditor Notice of Claims Procedure and Claims Bar Date, with a claim form, to every non-consumer creditor known to the Receiver that may have a potential claim against the Receivership Estate.⁵ The Receiver also posted a copy of the Notice and claim form on the Receivership Website. The Notice advised claimants to complete and return the claim form with any supporting documentation to the Receiver by the Claims Bar Date of June 16, 2025, if they believed they are owed money from the Receivership Entities.

The Receiver received timely submitted claims from American Express (“AMEX”) and two former EEB contractors, Paul Morana/Morana Enterprises LLC and Jijo William Nadar. Details regarding each of the three claimants, their claim submissions, and the Receiver’s determination as to their claims, are set forth below.⁶

⁴ Because the Receiver understands that the FTC historically handles consumer redress, the claims process that the Receiver and his counsel established is exclusively for any entity/individual that was *not* an EEB customer and that claims it is owed payment by any of the Receivership Entities.

⁵ Specifically, notice was sent out to the following entities/individuals: American Express, PayPal, Stripe Inc., Wave, Morana Enterprises LLC/Paul Morana, Ads with Finesse/Travis Bryant, Closer Secrets, Swiat LLC/Steve Swiat, Empire Tax Advisors/Angela Smith, Network Merchants LLC (NMI), Cedars Business Services LLC, Ecommerce 4 Team, Authorize.net, Landry and Jacobs LLC, American Coriadus International LLC, Creditors Adjustment Bureau, Khalid Angelo Manalundong, Rubeena Kousar, Sheldon Garwood, Ali Akbar Hussain Gulsan, Tareq Alrefae, Ruben Hernandez, Arianne Franco, Ruby Gull, Laraib Ahmed Siddiqui, Muhannad Adeel Iqbal, Kasib Kamil, Abdul Ghaffar, Muhammad Arsalan, Jijo William Nadar, Haya Kamil, Owais Ali Awan, Nadine Chu, and Nicole Thea Ferraren.

⁶ In accordance with the terms of the Permanent Injunction, the Receiver is sending the filed copy of this Final Report to the three non-consumer creditors, with a notice informing them that “any objections to paying any assets of the Receivership Entities to satisfy the Receiver’s costs and expenses and the monetary judgment set forth in th[e Permanent Injunction] must be submitted to the Court and served by mail upon the Receiver and the parties within 28 days of the mailing of the Final Report.” Permanent Injunction § VIII ¶ B.

A. American Express

American Express (“AMEX”) was the credit card company through which EEB had seven active business credit cards that it used in connection with its business operations. *See* ECF No. 72 at 14. On May 21, 2025, AMEX submitted seven separate claims for each of the seven business credit cards, collectively totaling \$153,255.80, for charges incurred up to the date of the entry of the TRO and Asset Freeze. The seven claims are broken down as follows: (1) \$51,205.34 claim submitted for Business Platinum Card x2007; (2) \$14,477.84 claim submitted for Business Gold Card x2002; (3) \$900.00 claim submitted for Business Gold Card x2005; (4) \$12,723.69 claim submitted for Business Gold Card x2008; (5) \$24,753.66 claim submitted for Business Gold Card x2003; (6) \$24,555.08 claim submitted for Business Gold Card x2000; and (7) \$24,640.19 claim submitted for Business Gold Card x4001. AMEX attached credit card statements for each business credit card in support of its stated amounts for each claim.

Upon review of the claim submissions and credit card statements submitted therewith, Receiver’s counsel observed that the \$51,205.34 claim submitted for Business Platinum Card x2007 included \$7,679.90 in charges that were incurred *after* the entry of the September 20, 2024 TRO and Asset Freeze. Because the Receiver placed AMEX on notice of the TRO and Asset Freeze the day the Order was entered, advised that no further charges should be permitted after that date, and explained in multiple follow-up communications with AMEX that any additional purchases, interest charges, late fees, or card renewal fees after the entry of the TRO and Asset Freeze were prohibited by the TRO and Asset Freeze (and later the Stipulated PI), Receiver’s counsel determined that the \$7,679.90 in charges incurred after the entry of the TRO and Asset Freeze were improperly included in AMEX’s claim submission for Business Platinum Card x2007. Therefore, on July 1, 2025, Receiver’s counsel sent a letter to AMEX’s counsel explaining the foregoing, advising that the Receiver calculated \$41,114.54 to be the appropriate claim amount for

Business Platinum Card x2007, and requesting that AMEX's counsel respond with whether AMEX agrees or disagrees with the Receiver's adjusted claim calculation. The letter further advised that the Receiver acknowledged and accepted the submitted claims for all six other business credit cards, and that acceptance of the claims only serves as an acknowledgement of the existence and amount of the claims and is *not* a guarantee that any payments will in fact be made.

On July 3, 2025, AMEX's counsel sent a response letter advising that AMEX agreed with the Receiver's adjusted claim calculation of \$41,114.54 for Business Platinum Card x2007. Accordingly, the Receiver has acknowledged and accepted a total of **\$143,165.00** in submitted claims from AMEX.

B. Paul Morana/Morana Enterprises LLC

Paul Morana was one of four former EEB 1099 contractors, and he specifically handled automation. *See* ECF No. 38 at 21 n.20. On June 4, 2025, Mr. Morana submitted a claim on behalf of himself and his entity Morana Enterprises LLC (as his compensation was paid directly to his entity), in the total amount of \$1,100.00 for an outstanding payment for services performed prior to the entry of the TRO and Asset Freeze. In support of his claim, Mr. Morana attached (1) the January 1, 2024 Consulting Agreement he entered into with Mr. Prusinowski (on behalf of EEB), which terms provide for EEB to pay Mr. Morana a flat monthly rate of \$1,100.00, and (2) an October 1, 2024 invoice for \$1,100.00 for Mr. Morana's work performed in September 2024.

On July 1, 2025, Receiver's counsel sent a letter to Mr. Morana informing him that the Receiver acknowledged and accepted his claim, and further advising that acceptance of his claim only serves as an acknowledgement of the existence and amount of the claim and is *not* a guarantee that any payments will in fact be made. Accordingly, the Receiver has acknowledged and accepted Mr. Morana/Morana Enterprises LLC's submitted claim for **\$1,100.00**.

C. Jijo William Nadar

Jijo William Nadar was one of EEB's back-office personnel and, specifically, was one of two people that were in charge of assisting EEB customers with placing the customers' advertisements, primarily on Facebook and Instagram, with the goal of bringing in orders for the customers. *See* ECF No. 38 at 22. On May 27, 2025, in response to the Notice of Claims Procedure and Claims Bar Date, Mr. Nadar sent Receiver's counsel a PDF containing compiled screenshots of conversations with prior EEB personnel regarding issues with past compensation payments to Mr. Nadar, followed by Mr. Nadar's own notes regarding the payment issues. On May 28, 2025, Receiver's counsel requested that Mr. Nadar complete and submit the Non-Consumer Creditor Claim Form, as well as provide information as to: (1) each invoice he sent to EEB, (2) the date and amount of each invoice, (3) whether each invoice was paid, (4) the date(s) the invoices were paid, (5) the amount paid per each invoice, and (6) confirmation pages showing the invoice payments, so that the Receiver could better understand the nature of Mr. Nadar's purported claim. On May 29, 2025, Mr. Nadar sent Receiver's counsel a completed Claim Form with additional, miscellaneous documentation in support of his claim. The submitted Claim Form specified that Mr. Nadar's total claim was \$7,947.12, representing outstanding payment for services performed.⁷

Based upon a review of Mr. Nadar's claim submission and all supporting documentation submitted therewith, and back-and-forth communications with Mr. Nadar regarding the supporting documentation, Receiver's counsel determined that Mr. Nadar's claim appeared to have merit. Therefore, on July 1, 2025, Receiver's counsel sent a letter to Mr. Nadar informing him that the

⁷ Mr. Nadar was one of the EEB back-office personnel that the Receiver continued making payments to in October 2024, pursuant to an agreed-upon reduced payment schedule, in order to continue business operations for then-existing EEB customers up and until the Receiver's formal shutdown of EEB business operations on October 31, 2024. *See* ECF No. 38 at 26-27. Mr. Nadar was also one of the several back-office personnel that the Receiver's agents experienced significant difficulty successfully wiring payment to, *see id.* at 27-28, due to Mr. Nadar residing abroad and the security measures imposed by both the Receiver's bank and Mr. Nadar's bank.

Receiver acknowledged and accepted his claim for \$7,947.12, but made clear that the Receiver's acceptance of his claim only serves as an acknowledgement of the existence and amount of the claim and is *not* a guarantee that any payments will in fact be made to him.⁸

V. ASSETS, EXPENSES, AND LIABILITIES OF THE RECEIVERSHIP ESTATE

A. Assets

As of October 24, 2025, the balance in the Receivership Account was \$668,653.10. This balance is the result of the wire and transfer activity set forth below.

Between the close of the Fourth Reporting Period (July 25, 2025) and October 24, 2025 (the "Fifth Reporting Period"), the Receivership Account has received: (a) a \$5,937.79 check from TD Bank for the balance of the Empire Realty account upon account closure, which was deposited on 10/7/25; and (b) a \$4,227.19 check from TD Bank for the balance of the Empire Partner account upon account closure, which was deposited on 10/22/25. Additional assets/potential assets include the balance in Empire Partner's PayPal account (\$216.45 as of 7/25/25), and the Constitution Ave Property, less what is owed on the mortgage.⁹

B. Expenses

Administrative expenses for the Fifth Reporting Period total \$12,763.08. The Receiver paid the following administrative expenses during the Fifth Reporting Period: (a) \$157.35 paid to Nickett Landscaping on 8/20/25, for lawn maintenance services for the Constitution Ave Property; (b) \$4,632.00 in total payments to DConstruct DiSigns LLC, for home improvement services for

⁸ Considering the significant difficulty the Receiver's agents experienced with wiring payment to Mr. Nadar in late 2024, in the event the Court directs the Receiver to make payment to Mr. Nadar for his submitted claim amount, it may be a costly effort for the Receiver's agents to expend time attempting to make another likely difficult payment to Mr. Nadar.

⁹ While the Receiver previously identified a potential \$95,000 shareholder loan as an asset in the Receiver's Accounting (ECF No. 53), the Receiver's Accountant was unable to locate any support for this loan balance outside of Quickbooks. Accordingly, the loan was reclassified as an equity distribution on the 2024 tax return for Empire Holdings.

the Constitution Ave Property (via three checks payments made on 9/2/25, 9/14/25, and 9/18/25); (c) \$997.50 paid to Olden Carpet and Flooring on 9/16/25, for carpet replacement for the Constitution Ave Property;¹⁰ (d) \$359.73 paid to SafeCo Insurance, the prior Constitution Ave Property insurance policy, on 10/13/25 to resolve an unaddressed, outstanding remaining balance for coverage during the Receivership period; (e) \$42.18 paid to GoDaddy on 10/16/25 for domain/email address renewals;¹¹ (f) \$268.90 in total payments to WSFS for miscellaneous bank fees; (g) \$5,630.76 in total mortgage payments for the Constitution Ave Property (including principal, interest, and escrow); (h) \$46.66 in water bills paid to North Wales Water Authority for the Constitution Ave Property; (i) \$78.15 in total sewer bills paid to Bucks County Water and Sewer Authority for the Constitution Ave Property; and (j) \$549.85 in total HOA payments for the Constitution Ave Property, which includes \$434.85 in monthly HOA fees and \$125.50 for past lawn mowing services before after the previous tenant moved out and before Nickett Landscaping was engaged.

C. Potential Liabilities (Non-Consumer Creditor Claims)

The Receivership Estate's potential liabilities are with respect to non-consumer creditor claim submissions that have been acknowledged and accepted by the Receiver, which total \$152,212.12 and consist of: (1) \$143,165.00 in total claims submitted by AMEX; (2) a \$1,100.00 claim submitted by Paul Morana/Morana Enterprises; and (3) a \$7,947.12 claim submitted by Jijo William Nadar. *See* Section IV, *supra*. Pursuant to Section VIII of the Permanent Injunction and the notice that the Receiver will send to the claimants following submission of this Report to the

¹⁰ The total cost of carpet replacement was \$1,995.00. The Receiver had to pay an initial deposit of \$997.50 to Olden Carpet & Flooring via credit card. That expense will appear as an expense on a future fee application.

¹¹ The Receiver has also subsequently paid for temporary domain/email address renewals, via credit card, as part of his agent's efforts to shut down the social media accounts as reported in Section III.A, *supra*. These credit card expenses will also appear as expenses on a future fee application.

Court, these claimants will have 28 days to file objections to the Receiver's distribution of funds to (1) pay the costs and expenses of administering the Receivership Estate (including compensation and expense reimbursement for the Receiver and his personnel), and then (2) pay all remaining funds to the FTC to reduce the monetary judgment award entered against Defendants in this action, subject to any necessary reserves set forth in the Receiver's upcoming Fifth Interim Fee Application. The Receiver will only pay these claims on behalf of the Receivership Estate if the Court, after reviewing this Final Report and any timely submitted objections, orders the Receiver to do so. *See* Permanent Injunction § VIII ¶ D.

VI. REMAINING ACTIONS TO WIND DOWN RECEIVERSHIP

Finally, additional anticipated wind-down actions are limited and include the following:

- Completing the sale of the Constitution Ave Property and notifying all service providers and insurers of the sale;
- Filing future tax returns for the Receivership Entities for 2025 and potentially 2026, if applicable;
- Taking further action to attempt to shut down EEB's TikTok account and Facebook page;
- Collecting any remaining assets of the Receivership Entities, including the funds from the Empire Partner PayPal account; and
- Winding down the Receivership Entities and filing final state and federal tax returns for same.

VII. CONCLUSION

In summary, the Receiver will continue to take steps to wind down and dissolve the Receivership Estate pursuant to his duties set forth in Section VII of the Permanent Injunction.

Respectfully Submitted,

Dated: October 28, 2025

s/ Robin S. Weiss
Robin S. Weiss, Esquire
Vanessa L. Huber, Esquire
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*Attorneys for Receiver,
Kevin Dooley Kent*

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDING GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,

Defendants.

Civil Action

No. 2:24-cv-04949-WB

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the Receiver Kevin Dooley Kent's Fifth/Final Written Status Report was filed and served on all counsel of record via the Court's Electronic Filing System pursuant to Fed. R. Civ. P. 5(b).

Dated: October 28, 2025

s/ Robin S. Weiss _____
Robin S. Weiss, Esq.
Attorney for Receiver, Kevin Dooley Kent

EXHIBIT C



Kevin Dooley Kent
Two Commerce Square
2001 Market Street
Suite 2620
Philadelphia, PA 19103
kkent@clarkhill.com

Invoice: 1656708
Date: 11/07/2025
Client: 0L5848
Matter: 0501765

Matter Name: Empire Holdings Group LLC, et al.

LEGAL SERVICES RENDERED AND COSTS ADVANCED THROUGH OCTOBER 31, 2025

Total Fees:	\$	23,987.00
Total Due This Invoice:	\$	23,987.00



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FOR LEGAL SERVICES RENDERED in connection with the above matter.

TIME AND FEE SUMMARY

Name	Initials	Rate	Hours	Amount
Kevin Kent	KK	\$722.50	33.20	23,987.00
Kevin Kent	KK	\$0.00	2.30	0.00
Total			35.50	\$ 23,987.00

DETAIL OF LEGAL SERVICES

Date	Initials	Description	Hours
03/05/25	KK	Update from FTC re settlement. Email to R. Weiss re same.	0.10
03/12/25	KK	Emails with R. Weiss re Wyoming compliance filing.	0.10
03/19/25	KK	Multiple emails re accounts and domains (.2 NO CHARGE).	0.20
03/21/25	KK	Meeting and emails with R. Weiss and V. Huber re Constitution Ave property, wrap up action items, [REDACTED]	0.60
03/24/25	KK	Emails with R. Weiss re Constitution Avenue Property.	0.10
03/26/25	KK	Emails with R. Weiss re Constitution Ave. property.	0.10
03/26/25	KK	Emails with R. Weiss re Clickfunnels account.	0.10
03/28/25	KK	Update from R. Weiss re Constitution Avenue Property and emails with R. Weiss re next steps re same.	0.30
03/31/25	KK	Review and revise draft email to A. Weyne re 6 Constitution Ave. Emails with R. Weiss re same.	0.20
04/02/25	KK	Review Charle Schwab statement of transfer and email to R. Weiss re questions re same.	0.10
04/02/25	KK	Emails with R. Weiss and V. Huber re Constitution Ave property issues.	0.10



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04/04/25	KK	Emails with R. Weiss re tenant issues re Constitution Ave property.	0.10
04/07/25	KK	Review and suggest revisions to draft third status report.	0.70
04/07/25	KK	Emails with R. Weiss re tenant issues re Constitution Ave property.	0.20
04/08/25	KK	Review draft motion to stay and related order. Emails with R. Weiss re same.	0.30
04/10/25	KK	Review draft proposed stipulation and order. Emails with V. Huber re same.	0.20
04/11/25	KK	Review Order on motion to stay.	0.10
04/11/25	KK	Review and comment on draft settlement agreement with tenant. Emails with V. Huber re same.	0.20
04/14/25	KK	Emails with V. Huber re settlement payment for tenant dispute and write check for same (.2 NO CHARGE).	0.20
04/15/25	KK	Emails with V. Huber and 6 Constitution Ave tenant re settlement.	0.10
04/18/25	KK	Review and approve draft correspondence to claimant.	0.10
04/25/25	KK	Phone call with R. Weiss re discussion with defendants' counsel re automobiles.	0.10
05/02/25	KK	Review filed motion re permanent injunction and correspondence from FTC re same. emails with R. Weiss and V. Huber re plan for claims process following same.	0.20
05/06/25	KK	Multiple correspondences with Court, parties' counsel, and R. Weiss re continuing jurisdiction.	0.30
05/08/25	KK	Review order to prepare for conference with Court. Emails with R. Weiss re same. Phone call with R. Weiss re issues warranting extending case opening. Telephonic hearing with court re same.	1.00
05/09/25	KK	Review Court Order.	0.20
05/11/25	KK	Emails with R. Weiss re issues for meeting with defendant re personalty and safe deposit box.	0.20



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05/14/25	KK	Phone call with R. Weiss re action items re wind up and order approving settlement.	0.30
05/15/25	KK	Review materials re claims process, creditor notices. Emails with V. Huber re same.	0.20
05/15/25	KK	Emails and phone call with R. Weiss re coin appraiser, dispute raised by defendant re coins, settlement implementation and related tasks.	0.40
05/16/25	KK	Review information for surrender of assets and appraisal of coins and bullion. Meet with J. Russel re safe deposit box issues.	0.40
05/16/25	KK	Review draft confirmation of surrender of assets regarding gold and coins.	0.10
05/17/25	KK	Emails with R. Weiss and appraiser.	0.10
05/19/25	KK	Correspondences and phone calls with J. Russell re bank issues.	0.60
05/19/25	KK	Emails with defendant and R. Weiss re final injunction activities.	0.20
05/19/25	KK	Round trip travel to Jamison for meeting with appraiser and defendant.	1.80
05/19/25	KK	Meeting with P. Prusinowski and Bucks County Rare Coin to review safe deposit box. Correspondences with R. Weiss and V. Huber during same. meeting with bank re close out issues.	1.20
05/20/25	KK	Emails with J. Russell re coin proceeds, closing bank accounts, and related tasks.	0.30
05/21/25	KK	Meeting with R. Weiss et al. re action items following permanent injunction.	1.00
05/22/25	KK	Emails with R. Weiss re real estate issues.	0.10
05/27/25	KK	Review Amex's claims.	0.10
05/27/25	KK	Email from overseas claimant; emails with V. Huber re follow-up.	0.10
05/29/25	KK	Review draft motion to enforce order against Stripe. Emails with V. Huber re same. review and execute related affidavit.	0.60



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05/30/25	KK	Phone call with R. Weiss re claims process and assets.	0.50
06/01/25	KK	Email to TD Bank re closing accounts.	0.10
06/02/25	KK	Further emails with TD Bank re account and SD box closure.	0.10
06/02/25	KK	Emails with TD Bank re account and SD box closure.	0.10
06/04/25	KK	Review order re stripe. Review correspondence to Stripe's counsel re same.	0.10
06/05/25	KK	Review and execute agreement re maintenance of landscaping at property. Emails with A. Winner re same.	0.20
06/06/25	KK	Emails with V. Huber re Stripe.	0.10
06/06/25	KK	Emails with A. Winner re property maintenance.	0.10
06/09/25	KK	Emails re payment re property upkeep (.2 NO CHARGE).	0.20
06/10/25	KK	Review motion for sale of real property and emails with R. Weiss re potential adjustments to same. phone call with R. Weiss re same.	0.50
06/12/25	KK	Review order re stripe (.1 NO CHARGE).	0.10
06/12/25	KK	Correspondences with bank re SD box and account closure.	0.10
06/23/25	KK	Email from creditor claiming to handle 401k issues. Emails with V. Huber and R. Weiss re follow-up.	0.10
06/24/25	KK	Emails re creditor claims.	0.10
06/25/25	KK	Meeting with R. Weiss and V. Huber [REDACTED]	0.30
06/27/25	KK	Discuss 401 tax and wrap up issues with R. Weiss.	0.20
06/27/25	KK	Emails and phone call with WSFS re savings account for receivership funds. Emails with J. Russell re same.	0.20



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06/28/25	KK	Review and execute bank documents for opening savings account for longer term funds holding for receivership estate. Emails with WSFS re same.	0.40
06/30/25	KK	Review and revise draft letters re claim determination. Emails with V. Huber and R. Weiss re same.	0.50
06/30/25	KK	Emails with R. Weiss re insurance for real property and status of sale process for same.	0.30
07/01/25	KK	Meeting with R. Weiss re claims issues and tax issues re real estate sale.	0.20
07/01/25	KK	Emails with R. Weiss re content of responses to claims submissions.	0.10
07/03/25	KK	Review AmEx updated position re creditor claim.	0.10
07/05/25	KK	Review tax analysis re real property sale from A&M.	0.10
07/07/25	KK	Emails with R. Weiss and A&M re tax returns for receivership entities.	0.20
07/08/25	KK	Emails with R. Weiss and A&M re tax issues and property sale.	0.20
07/08/25	KK	Meeting with R. Weiss re tax issues.	0.10
07/09/25	KK	Review materials from 401(k) consultant to Empire. Write checks for same.	0.20
07/09/25	KK	Emails with R. Weiss and insurance broker re replacement policy for real property.	0.10
07/09/25	KK	Meeting with counsel and A&M re tax issues re various receivership entities.	0.70
07/10/25	KK	Multiple emails with R. Weiss and insurance broker re coverage for realty. Phone call with R. Weiss re optimal coverage.	0.30
07/10/25	KK	Emails with J. Russell re new account to hold funds and set up re same.	0.20
07/11/25	KK	Review and execute documents for new account. Emails with WSFS re same.	0.20



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07/11/25	KK	Emails with R. Weiss and broker re insurance. Review insurance documents. execute coverage application.	0.30
07/16/25	KK	Review insurance invoice and emails with J. Russell re same.	0.10
07/20/25	KK	Review and execute Empire Holdings 401K materials including those re taxes and termination of plan. Emails with R. Weiss and J. Russell re same.	0.50
07/22/25	KK	Review materials from mortgage company. Emails with R. Weiss and V. Huber re strategy re same.	0.20
07/23/25	KK	Discuss mortgage issues with R. Weiss.	0.10
07/24/25	KK	Review and approve draft letter to mortgage company. Emails with V. Huber re same.	0.10
07/28/25	KK	Review and revise draft fourth status report and emails with V. Huber re same.	0.50
07/28/25	KK	Review order re sale of real property.	0.10
07/28/25	KK	Emails with V. Huber and R. Weiss wrap up plan for social media.	0.10
07/29/25	KK	Emails with R. Weiss and V. Huber re authorization to begin wind down of social media accounts.	0.10
07/30/25	KK	Emails with J. Russell and WSFS re fund for saving account to earn more interest,.	0.20
07/31/25	KK	Emails with R. Weiss re Constitution Avenue property expenses / taxes / mortgage.	0.10
08/05/25	KK	Update post office forwarding for Empire Realty, complete form re same.	0.20
08/07/25	KK	Review materials and approve payment re property maintenance.	0.10
08/08/25	KK	Phone call with R. Weiss re title search. Emails with J. Russell re property maintenance payments (.2 NO CHARGE).	0.20
08/15/25	KK	Review R. Weiss memo re likely needed expenses / repairs, etc. for Constitution Avenue property in advance of sale. [REDACTED]	0.30



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08/17/25	KK	Multiple correspondences with R. Weiss re issues re sale of Const. Ave. property.	0.20
08/18/25	KK	Review and execute listing agreement with Const. Ave. property. Emails with R. Weiss re same.	0.40
08/20/25	KK	Emails with R. Weiss re sales process for Const. Ave. property.	0.10
08/20/25	KK	Emails with FTC re TD Bank issues and CRM data.	0.20
08/22/25	KK	Emails with A. Winner and PECO re Const Ave property.	0.20
08/24/25	KK	Review R. Weiss summary [REDACTED]	0.10
08/26/25	KK	Emails with R. Weiss re property improvement estimates.	0.10
08/26/25	KK	Phone call with PECO re Const. Ave.	1.30
09/02/25	KK	Review and approve invoice for home repairs for Const. Ave Property. Make payment for same. Emails with R. Weiss re same.	0.20
09/03/25	KK	Emails with R. Weiss re Const. Ave. Mortgage.	0.10
09/09/25	KK	Review correspondence from TD bank re closure of account. Emails with R. Weiss and J. Russell re same. review email with TD bank re same and account closures.	0.40
09/10/25	KK	Emails with V. Huber and R. Weiss [REDACTED]	0.10
09/10/25	KK	Emails re TD accounts and payments for real estate matters.	0.10
09/11/25	KK	Review correspondences with TD Bank re accounts.	0.20
09/12/25	KK	Phone call and correspondences with R. Weiss re real property sale and improvements.	0.40
09/13/25	KK	Write checks for property related maintenance.	0.10



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09/15/25	KK	Review and execute tax returns. Emails with A&M re same. Emails with R. Weiss and V. Huber re same and next steps with defendant P. Prusinowski.	1.00
09/16/25	KK	Review materials re property improvements and discuss same with R. Weiss. Emails with R. Weiss re property issues. Execute checks for same.	0.50
09/18/25	KK	Execute vendor payments and analyze invoices.	0.10
09/19/25	KK	Attend post office meeting re change of address with explanation of final order and issues re Empire Realty.	0.50
09/28/25	KK	Review Constitution Ave. listing.	0.10
10/01/25	KK	Multiple emails with realtor and R. Weiss re offer and impending offers on 6 Constitution Ave.	0.30
10/03/25	KK	Review and execute sales agreement for Const. Ave. property. Correspondences with R. Weiss re same.	0.40
10/03/25	KK	Review multiple offers for Const. Ave. property and realtor thoughts on same. Phone call with R. Weiss re offers. Follow-up correspondences from realtor and R. Weiss.	1.00
10/06/25	KK	Review materials re Empire Realty TD Bank account closing, emails with J. Russell re same and funds from account.	0.20
10/06/25	KK	Emails with V. Huber re shut-down of all remaining social media.	0.10
10/07/25	KK	Emails with J. Russell re Empire Realty funds and invoices related to property.	0.10
10/08/25	KK	Review account statement and USPS notification.	0.10
10/13/25	KK	Emails with MK Mull and J. Russell re actions re shut down of remaining social media sites.	0.20
10/14/25	KK	Multiple correspondences with V. Huber and M. Mull re operational shut down issues re websites and social media.	0.20
10/16/25	KK	Review notice of closing for Const Ave property (.1 NO CHARGE).	0.10



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10/16/25	KK	Correspondences with bank and R. Weiss re closing account checks and mail forwarding.	0.20
10/17/25	KK	Review checklist of issues to address for closing and emails with R. Weiss re same. multiple correspondences with agents re title and closing.	0.20
10/19/25	KK	Emails with R. Weiss and J. Short re issues for closing.	0.20
10/20/25	KK	Emails with R. Weiss re issues to address re sale and mortgage.	0.20
10/23/25	KK	Emails with realtor re Empire Realty details for closing. (.2 NO CHARGE)	0.20
10/24/25	KK	Emails with realtor and J. Russell re closing issues.	0.10
10/26/25	KK	Emails with R. Weiss re asset disposition (.1 NO CHARGE).	0.10
10/27/25	KK	Review and revise fifth status report and emails with V. Huber re same.	0.60
10/28/25	KK	Meeting with V. Huber re additional adjustments to status report.	0.40
10/28/25	KK	Multiple correspondences with realtor re closing issues.	0.10
10/30/25	KK	Correspondences with agent re closing for 6 Constitution Ave property.	0.10
10/31/25	KK	Review updated closing notice for 6 Constitution Ave property and correspondence re same.	0.10

Total 35.50

TASK SUMMARY

	Hours	Amount
L110 - Fact Investigation/Development	0.5	361.25
A101 - Plan and prepare for	0.5	361.25
L120 - Analysis/Strategy	33.3	22,469.75
A103 - Draft/revise	0.2	144.50
A104 - Review/analyze	14.4	10,042.75
A105 - Communicate (in firm)	13.0	8,453.25
A107 - Communicate (outside counsel)	0.8	578.00



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A108 - Communicate (other external)	1.9	1,083.75
A109 - Appear for/attend	3.0	2,167.50
L140 - Document/File Management	0.2	144.50
A104 - Review/analyze	0.2	144.50
L160 - Settlement/Non-Binding ADR	0.1	72.25
A104 - Review/analyze	0.1	72.25
L190 - Other Case Assess, Develop, Adm	1.4	939.25
A108 - Communicate (other external)	1.3	939.25
A110 - Manage data/files	0.1	0.00
	<u>35.5</u>	<u>\$23,987.00</u>

EXHIBIT D



Kevin Dooley Kent
Two Commerce Square
2001 Market Street
Suite 2620
Philadelphia, PA 19103
kkent@clarkhill.com

Invoice: 1656670
Date: 11/07/2025
Client: 0L5848
Matter: 0501765

Matter Name: Empire Holdings Group LLC, et al.

LEGAL SERVICES RENDERED AND COSTS ADVANCED THROUGH OCTOBER 31, 2025

Total Fees:	\$	122,584.35
Total Expenses:		1,794.54
Total Due This Invoice:	\$	124,378.89



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FOR LEGAL SERVICES RENDERED in connection with the above matter.

TIME AND FEE SUMMARY

Name	Initials	Rate	Hours	Amount
Robin Weiss	RW	\$562.50	66.10	37,181.25
Robin Weiss	RW	\$0.00	2.50	0.00
Stephen M. Wolf	SMW	\$562.50	1.30	731.25
Vanessa Huber	VH	\$436.50	134.90	58,883.85
Vanessa Huber	VH	\$0.00	4.20	0.00
Madison Mull	MM	\$300.00	8.20	2,460.00
Justin Russell	JR	\$270.00	84.70	22,869.00
Justin Russell	JR	\$0.00	0.10	0.00
Ching Chew	CC	\$270.00	1.70	459.00
Ching Chew	CC	\$0.00	10.40	0.00
			Total	314.10 \$ 122,584.35

DETAIL OF LEGAL SERVICES

Date	Initials	Description	Hours
03/03/25	VH	Review and revise email responses to Empire customer inquiries sent to Receivership email address and send revised email responses to J. Russell.	0.30
03/03/25	VH	Review letter from Cedars Business Services regarding Empire's outstanding amount owed to Paya Services, draft letter to Cedars Business Services regarding notice of receivership and prohibition on attempts to collect on outstanding Paya Services debt, and send draft letter to R. Weiss for review.	0.50
03/03/25	VH	Email correspondence with T. Gosau and R. Weiss regarding treatment of negative balances in Amex and Stripe accounts.	0.10
03/03/25	RW	Communicate with V. Huber and T. Gosau regarding plan for and handling of debts owed to Stripe and AMEX (0.1); Review notice from Cedars Business Services regarding amounts owed to Paya Services Inc. and communicate with team regarding plan for handling same (0.1).	0.20



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03/04/25	MM	Correspondence with former customer regarding update of the matter.	0.10
03/04/25	JR	Update potential creditor list and email to R. Weiss regarding same.	0.20
03/04/25	JR	Review of receivership inbox and draft responses to inquiries.	0.20
03/05/25	VH	Revise and finalize letters to Paya Services and Cedars Business Services and coordinate mailing of same with mailroom.	0.30
03/05/25	VH	Review and revise notice letter to Cedars Business Services, draft notice letter to Paya Services, and send draft letter to Paya to R. Weiss for review.	0.60
03/05/25	VH	Confer with R. Weiss regarding letter to debt collector for Paya Services and notice of receivership letter to Paya Services.	0.10
03/05/25	VH	Email correspondence with R. Weiss regarding Paya Services and emails with P. Prusinowski regarding same.	0.20
03/05/25	VH	Email correspondence with R. Weiss, J. Russell, and C. Chew regarding considerations and method for providing access to Empire training videos to former Empire customers requesting access to such.	0.10
03/05/25	JR	Review WSFS account, download and forward statement to R. Weiss, K. Kent, V. Huber, M. Mull, A. Grier, R. McAuliffe, G. Christiansen, and S. McBrearty.	0.20
03/05/25	JR	Review receivership inbox and draft responses to inquiries from customers and forward to V. Huber for review.	0.70
03/05/25	JR	Review amex statements and emails to/from R. Weiss regarding amex statements.	0.20
03/05/25	RW	Communicate with V. Huber regarding plan for follow-up regarding Paya (0.1); Email P. Prusinowski regarding Paya Services debt (0.1); Review proposed letter to Cedars Business Services regarding debt collection letter and notice of receivership and email v. Huber regarding same (0.1); Review various American Express bills and email J. Russell regarding same (0.1).	0.40
03/06/25	VH	Review and revise email responses to Empire customer inquiries sent to Receivership email address, send revised email responses to J. Russell, and confer with J. Russell regarding same.	0.30



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03/06/25	VH	Review email from Cedars Business Services responding to Receiver's notice letter and confirming debt collection efforts have ceased.	0.10
03/06/25	JR	Assemble draft responses regarding master list of email inquiry responses for receivership inbox.	0.70
03/06/25	JR	Begin review of draft response regarding empire receiver email.	0.10
03/06/25	JR	Phone call with V. Huber regarding response list	0.10
03/07/25	VH	Review and revise notice letter to NMI and send updated draft to M. Mull.	0.30
03/07/25	RW	Review email from Cedar Financial advising they are ceasing all collection activities in light of our notice and Stipulated PI (0.1); Review notice regarding AMEX dispute through Stripe and email K. Kent and V. Huber regarding same (0.1); Communicate with team regarding plan for providing App Member Pro access to subscribers (0.1); Review proposed final order and email K. Kent, V. Huber, A. Grier, and R. McAuliffe regarding same (0.6); Call with V. Huber regarding App Members Pro video access (0.1); Review response from Alvarez and Marsal team regarding tax concerns for keeping Empire active in Wyoming (0.1).	0.80
03/07/25	VH	Review preserved documents and data from App Members Pro to identify all content that was provided to Empire customers and email R. Weiss, J. Russell, and C. Chew regarding same.	0.90
03/07/25	VH	Review documents and emails regarding Charles Schwab tax documents and email R. Weiss and T. Gosau regarding same.	0.20
03/07/25	VH	Confer with R. Weiss regarding preserved content from App Members Pro to share with former Empire customers who have requested said content.	0.10
03/07/25	VH	Email correspondence with R. Weiss regarding Stripe notification of disputed charge from former Empire customer.	0.10
03/07/25	VH	Email correspondence with R. Weiss and K. Kent regarding American Express initiating dispute with Stripe.	0.10
03/07/25	VH	Email correspondence with R. Weiss and M. Mull regarding Paya Services and NMI.	0.20
03/07/25	VH	Telephone call with former Empire customer regarding status of case.	0.10



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03/07/25	VH	Review email correspondence from T. Gosau regarding tax team advisement on maintaining active entity status for Empire Holdings in Wyoming.	0.10
03/07/25	MM	Draft Notice of Receivership to NMI.	0.30
03/07/25	MM	Correspondence with R. Weiss and V. Huber regarding Notice of Receivership to NMI.	0.10
03/10/25	RW	Call with P. Prusinowski regarding tax filings; Email T. Gosau regarding same.	0.20
03/10/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/11/25	VH	Draft email to counsel for Stripe regarding notifying of the two customer payment disputes and informing Stripe that processing disputes and debiting same from the Empire Stripe account is prohibited by the Stipulated Preliminary Injunction, send draft email to R. Weiss for review, and send finalize email to counsel for Stripe.	0.50
03/11/25	VH	Email correspondence with C. Chew regarding copying all preserved data from App Members Pro to be shared with former Empire customers requesting access to training videos.	0.10
03/11/25	VH	Review email correspondence from R. Weiss and T. Gosau regarding taxes and accounting done for the Receivership entities.	0.10
03/11/25	VH	Confer with R. Weiss regarding how to address notification from Stripe regarding former Empire customer dispute filed with American Express and resultant notification of debiting the Stripe account because of dispute.	0.20
03/11/25	VH	Review prior email correspondence with counsel for Stripe, confer with R. Weiss regarding same, and send follow up emails to counsel for Stripe regarding prior correspondence.	0.30
03/11/25	RW	Call with V. Huber regarding American Express charge-back.	0.30
03/11/25	RW	Review email from T. Gosau regarding accounting; Email P. Prusinowski regarding same.	0.10
03/11/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00



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03/12/25	RW	Review submission to receivership inbox regarding business activities of A. Gulshan and P. Prusinowski and forward same to FTC.	0.10
03/12/25	RW	Review Wyoming secretary of state website to ascertain corporate status of Empire; Prepare proposed email to counsel regarding same for K. Kent and V. Huber review.	0.30
03/12/25	VH	Review, compile, and send Atlas Fund Trust formation documents to T. Gosau for Atlas accounting and tax purposes.	0.20
03/12/25	JR	Review receivership inbox and stipulation petition and forward inquiry to R. Weiss, V. Huber, K. Kent, and M. Mull for review.	0.60
03/12/25	JR	Review box shared folder regarding questionnaire and review questionnaire and update summary spreadsheet.	0.20
03/12/25	JR	Download and forward Amex statements to P. Prusinowski and G. Christiansen and Forward Amex email to P. Prusinowski and G. Christiansen for review.	0.20
03/12/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/12/25	VH	Confer with R. Weiss regarding preparation of third written report.	0.20
03/13/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/14/25	JR	Download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.20
03/14/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/17/25	RW	Meet with R. McAuliffe to discuss current case status and plans for rental property and claims process (0.3); Review consumer inquiry regarding status and V. Huber response to same (0.1).	0.40
03/17/25	VH	Confer with J. Russell regarding emails sent to customers from Empire email address and respond to Empire customer email inquiry regarding case updates and status.	0.30



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03/17/25	JR	Review, download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.20
03/17/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/18/25	RW	Communicate with P. Prusinowski regarding Celsius claim and email expiration.	0.10
03/18/25	JR	Review and submit payment regarding GoDaddy domain renewal.	0.30
03/18/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/19/25	VH	Email correspondence with M. Mull regarding responding to Empire customer inquiry on case status.	0.10
03/19/25	VH	Telephone call with former Empire customer regarding inquiry on case status and updates.	0.20
03/19/25	JR	Review WSFS account and GoDaddy account and email to R. Weiss, V. Huber, and K. Kent regarding renewal payment.	0.20
03/19/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/20/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/21/25	VH	Zoom call with K. Kent and R. Weiss regarding planned course of action for payments for Constitution Ave property and general action items in furtherance of receivership.	0.50
03/21/25	VH	Email correspondence with R. Weiss and K. Kent regarding payments for the Constitution Ave property owned by Empire Realty.	0.30
03/21/25	VH	Confer with R. Weiss regarding facts underlying payments for Constitution Ave property and strategy and considerations for course of action regarding same.	0.30
03/21/25	RW	Call with P. Prusinowski regarding 6 Constitution Ave property bills.	0.30



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03/21/25	RW	Review and respond to email from P. Prusinowski regarding security deposit, mortgage and other house obligations; Review invoices; Email K. Kent and V. Huber regarding plan for handling same.	0.30
03/21/25	JR	Review accounts and submit payments regarding 6 Constitution Avenue property, emails to/from R. Weiss regarding accounts payments; and calendar payment deadlines	1.30
03/21/25	JR	Review, download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.10
03/21/25	RW	Meet with K. Kent and V. Huber to discuss plan for handling issues with Constitution Ave property.	0.50
03/21/25	RW	Call with V. Huber regarding plan for addressing tenant issues.	0.30
03/21/25	RW	Call and email with S. Wolf regarding security deposit issue; Emails to team regarding payments of outstanding balances for Constitution Ave property and visit to property.	0.40
03/21/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	1.00
03/24/25	VH	Review email correspondence from S. Wolf, R. Weiss, and K. Kent regarding [REDACTED]	0.10
03/24/25	JR	Review WSFS account, approve positive pay, and email to K. Kent and R. Weiss regarding approval of positive pay regarding payments for 6 Constitution Avenue property.	0.20
03/24/25	JR	Review, download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.10
03/24/25	SMW	Review and analysis of Lease, communications, and PA Landlord Tenant Act [REDACTED]	1.10
03/24/25	RW	Review email and analysis from S. Wolf [REDACTED]; Communicate with W. Myers regarding site visit; Email P. Prusinowski regarding same; Email K. Kent and V. Huber regarding plan for site visit and potential changing of locks.	0.30



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03/25/25	CC	Transferred folder contents from one directory to another per request of V. Huber (1.0 - NO CHARGE).	0.40
03/26/25	VH	Email correspondence with R. Weiss regarding clickfunnels subscription renewal.	0.10
03/26/25	MM	Correspondence with two former customers regarding status of case.	0.20
03/26/25	RW	Review email from P. Prusinowski regarding Clickfunnels subscription renewal and email team regarding same.	0.10
03/26/25	RW	Review and coordinate options and timing for 6 Constitution Ave visit.	0.30
03/26/25	JR	Review Clickfunnels invoice and email to Clickfunnels regarding payment methods.	0.30
03/26/25	JR	Review, download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.10
03/26/25	RW	Emails with team regarding Clickfunnels renewal to keep website up.	0.10
03/27/25	RW	Travel to and from 6 Constitution Avenue property, inspect property in response to tenant security deposit demand, and meet with locksmith to change locks.	2.60
03/28/25	SMW	Review and revise letter to tenant regarding security deposit.	0.20
03/28/25	VH	Review and revise draft letter to former tenant of Constitution Ave property regarding security deposit and breaches of certain provisions of lease agreement and send updated draft to R. Weiss, K. Kent, and S. Wolf for review.	0.40
03/28/25	VH	Review copy of all preserved contents of Members Pro training courses, cull out irrelevant and/or immaterial contents, and send folder of contents to J. Russell to create iManage Share secure link to send to former Empire customers who have requested access to same.	1.50
03/28/25	VH	Email correspondence with R. Weiss regarding revisions to letter to former tenant of Constitution Ave property regarding security deposit and breaches of certain provisions of lease agreement.	0.10



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03/28/25	RW	Review and analyze lease agreement [REDACTED] (0.6); Prepare letter to tenant regarding damage to property and decision not to return security deposit (1.3); Prepare email to K. Kent., V. Huber and S. Wolf regarding same (0.2).	2.10
03/28/25	JR	Review receivership inbox regarding inquires.	0.50
03/31/25	VH	Review email correspondence from R. Weiss and K. Kent regarding payment for continued rental of safe deposit box.	0.10
03/31/25	RW	Review V. Huber email to Stripe regarding transfer from Storefunnels account.	0.10
03/31/25	VH	Email counsel from Stripe regarding following up on status of responding to prior inquiries made in early February.	0.10
03/31/25	RW	Email P. Prusinowski regarding status of personal taxes.	0.10
03/31/25	JR	Download and forward Amex statements to P. Prusinowski and G. Christiansen.	0.20
03/31/25	RW	Review, revise and finalize letter to tenant regarding security deposit; Email A. Grier and R. McAuliffe to provide update on same.	0.50
04/01/25	JR	Review WSFS account regarding transactions and wire transfers and emails to/from V. Huber regarding wire payments and transactions.	0.50
04/01/25	JR	begin review of Receivership inbox regarding inquires.	1.00
04/01/25	JR	review WSFS account, download and forward statement to R. Weiss, K. Kent, V. Huber, M. Mull, A. Grier, R. McAuliffe, G. Christiansen, and S. McBrearty.	0.30
04/01/25	JR	review account and pay Mortgage and HOA fee for 6 Constitution Ave property.	0.60
04/01/25	JR	Empire Holdings Matter - Members Pro - Trainings	0.20
04/01/25	VH	Draft Third Written Report to the Court (5.7) and Motion for Approval of Third Interim Fee Application (0.6 NO CHARGE).	5.70



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04/01/25	VH	Confer with J. Russell regarding Receivership bank account activity during Third Reporting Period for reference in Third Status Report to the Court.	0.20
04/01/25	VH	Confer with R. Weiss regarding preparation of third written status report and fee application.	0.20
04/02/25	VH	Review Constitution Ave former tenant's response to Letter regarding his security deposit and confer with R. Weiss and K. Kent regarding considerations for responding to same.	0.20
04/02/25	VH	Email correspondence with K. Kent and R. Weiss regarding letter from Charles Schwab dated December 2024 but received just now regarding the transfer of funds from the Atlas Fund account to the Receivership Account.	0.10
04/02/25	JR	Continue review of receivership inbox and draft responses regarding inquires and forward to V. Huber for review.	0.60
04/02/25	JR	review WSFS Account regarding ACH Positive Pay.	0.20
04/02/25	RW	Review response from tenant regarding position on security deposit and email K. Kent and V. Huber regarding same.	0.10
04/02/25	VH	Finish drafting Third Written Report to the Court and send draft to R. Weiss for review.	3.60
04/03/25	VH	Review and revise draft email responses to customer email inquiries and send updated email responses to J. Russell.	0.70
04/03/25	RW	Review email from co-signer on tenant's lease and email K. Kent and V. Huber regarding same (0.1); Call with V. Huber regarding same (0.4).	0.50
04/03/25	VH	Review emails regarding Constitution Ave former tenant requesting return of security deposit and confer with R. Weiss regarding strategy for responding to same.	0.40
04/03/25	JR	Review and update Third Status Report.	1.50
04/03/25	JR	review WSFS account regarding approval of Positive Pay regarding ACH payment.	0.20
04/03/25	RW	Review and revise third status report.	0.80



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04/03/25	VH	Review and revise third status report (1.9) and third interim fee application (NO CHARGE 0.4) and send updated draft to J. Russell to update account balance numbers for various accounts referenced therein.	1.90
04/03/25	VH	Review and propose redactions to privileged billing narratives in bills to be submitted in connection with Third Interim Fee Application and send bills with proposed redactions to R. Weiss for review (NO CHARGE 0.8).	0.80
04/04/25	VH	Review and revise draft response email to former tenant of Constitution Ave property and send revised response email to R. Weiss.	0.30
04/04/25	VH	Review email from T. Gosau regarding summary of A&M work performed during Third Reporting Period for inclusion in Third Status Report to the court.	0.10
04/04/25	VH	Review Constitution Ave former tenant's response to R. Weiss email proposal for security deposit and confer with R. Weiss regarding same.	0.10
04/04/25	VH	Review email correspondence from R. Weiss and K. Kent regarding strategy for responding to Constitution Ave former tenant's request for return of security deposit and confer with R. Weiss regarding same.	0.30
04/04/25	VH	Email correspondence with T. Gosau regarding clarification of named grantors of Atlas Fund Trust for tax documentation purposes.	0.10
04/04/25	JR	phone call with V. Huber and continue to review and update of Draft 3rd Status Report and forward update draft to V. Huber and R. Weiss.	1.80
04/04/25	JR	review Draft responses re Empire Receiver Email and email to V. Huber.	0.20
04/04/25	RW	Communicate with K. Kent and V. Huber regarding plan for address tenant security deposit.	0.20
04/04/25	RW	Email A. Grier and R. McCauliffe regarding issues with former tenant.	0.10
04/04/25	RW	Send response email to tenant regarding security deposit.	0.10
04/04/25	VH	Review and revise draft Third Status Report and send updated draft to R. Weiss for review.	1.60
04/04/25	VH	Confer with J. Russell regarding PayPal account balance amount to be reported in Third Status Report to the court.	0.10



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04/04/25	VH	Confer with J. Russell regarding consumer questionnaires submitted as of January 1, 2025 for inclusion and reference in Third Status Report to the court.	0.10
04/07/25	VH	Draft letter to former Constitution Ave tenant enclosing security deposit check and memorializing agreement to same and send draft letter to R. Weiss for review.	1.00
04/07/25	VH	Review email correspondence from R. Weiss and K. Kent regarding plan for resolution of security deposit issue with former Constitution Ave tenant.	0.10
04/07/25	MM	Correspondence with one former customer regarding status of the case.	0.10
04/07/25	JR	Download and forward Fidelity statement to P. Prusinowski and G. Christiansen.	0.20
04/07/25	JR	review water bill for 6 Constitution Ave and calendar deadline.	0.30
04/07/25	JR	emails to/from V. Huber and R. Weiss regarding Draft 3rd Status Report and Fee Application.	0.30
04/07/25	JR	Review receivership inbox regarding inquiries and issue responses to consumers.	0.50
04/07/25	RW	Email K. Kent regarding plan for agreement regarding security deposit; Email former tenant regarding plan for payment of same.	0.20
04/07/25	RW	Review and revise status report.	1.60
04/07/25	VH	Revise and finalize redacted bills to be submitted in connection with third interim fee application and send bills to K. Kent for review (NO CHARGE 0.4).	0.40
04/07/25	VH	Review and revise draft Third Status Report (1.1) and Third Interim Fee Application (NO CHARGE 0.1) and send updated draft to K. Kent for review.	1.10
04/07/25	RW	Review and revise proposed redactions for fee application (0.6 - NO CHARGE).	0.60



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04/07/25	VH	Email correspondence with K. Kent and J. Russell regarding revisions to account balances stated in draft Third Status Report to the court and correspondence with K. Kent regarding execution of declaration in support of fee application.	0.30
04/07/25	VH	Confer with R. Weiss regarding revisions to Third Status Report to the court.	0.10
04/08/25	VH	Draft letter to Landry and Jacobs collection agency responding to their attempt to collect debt on behalf of Authorize.net and send draft letter to R. Weiss for review.	0.30
04/08/25	VH	Review and revise letter to former Constitution Ave tenant memorializing agreement to return half of security deposit and send updated draft to K. Kent and R. Weiss for review.	0.90
04/08/25	VH	Revise and finalize letter to Landry and Jacobs collection agency responding to their attempt to collect debt on behalf of Authorize.net, email letter to collection agency, and coordinate mailing copy of letter with mailroom.	0.20
04/08/25	RW	Review demand regarding Authorize.net; Review proposed letter from V. Huber regarding same.	0.10
04/08/25	VH	Review Landry and Jacobs collection agency's response to letter regarding prohibition on collection attempts and confer with R. Weiss regarding same.	0.10
04/08/25	VH	Review email notice from collection agency seeking to collect on behalf of Authorize.net and email R. Weiss and K. Kent regarding responding to same.	0.30
04/08/25	RW	Review and revise proposed letter to tenant with settlement agreement and email V. Huber regarding same.	0.80
04/08/25	JR	review and forward email regarding Formal Demand for Payment from Landry and Jacobs, LLC to R. Weiss, V. Huber, M. Mull, and K. Kent.	0.30
04/08/25	RW	Communicate with V. Huber regarding plan for letter to tenant and resolution for same.	0.10
04/08/25	VH	Confer with R. Weiss regarding finalizing Third Status Report, and revisions to letter to former Constitution Ave tenant regarding agreement to return half of the security deposit.	0.20



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04/08/25	RW	Review proposed motion for stay and consent for same; Email team regarding same.	0.10
04/09/25	JR	review WSFS account regarding positive pay approval.	0.20
04/10/25	VH	Confer with J. Russell regarding plan for issuance of security deposit check to former Constitution Ave tenant upon tenant's execution of acknowledgement and agreement of same.	0.10
04/10/25	VH	Revise and finalize third status report and third interim fee application and all accompanying documents and send all finalized documents to L. Doyle for filing (NO CHARGE 0.2 FOR FEE APPLICATION)	0.40
04/10/25	VH	Review the FTC's consent motion to stay deadlines while settlement is reviewed by the Commission.	0.10
04/10/25	VH	Email correspondence with K. Kent regarding Receiver's certification for Third Interim Fee Application (NO CHARGE 0.1).	0.10
04/10/25	VH	Email correspondence with FTC regarding consent to proposed motion to stay.	0.10
04/11/25	VH	Revise and finalize letter to former Constitution Ave tenant and cosigner regarding agreement and acknowledgement to return half of security deposit and send same to former tenant and cosigner.	0.30
04/11/25	VH	Email correspondence with K. Kent regarding draft letter to former Constitution Ave tenant regarding agreement and acknowledgement to return half of security deposit.	0.10
04/11/25	VH	Email correspondence with Constitution Ave cosigner regarding letter regarding agreement and acknowledgement to return of half of security deposit.	0.10
04/11/25	JR	Review, download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.20
04/14/25	VH	Email correspondence with M. Mull regarding response to Empire customer inquiry about potential refunds.	0.10
04/14/25	VH	Email correspondence with K. Kent re check to be issued to former Constitution Ave tenant for return of half of security deposit.	0.10



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04/14/25	VH	Email correspondence with K. Kent re archiving data in Relativity database, review Stipulated Preliminary Injunction in light of same, and email FTC regarding intent to archive data.	0.40
04/14/25	JR	Download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.30
04/14/25	JR	update transaction ledger regarding settlement payment to A. Wayne.	0.10
04/15/25	VH	Review and create final signed copy of letter to former Constitution Ave tenant and coordinate mailing of same with security deposit check with J. Russell.	0.10
04/15/25	VH	Email correspondence with the FTC and IG360 re archiving documents and data that are in Relativity database.	0.10
04/15/25	MM	Correspondence with two former customers regarding potential refunds and status of case.	0.20
04/15/25	VH	Review documentation regarding the Atlas entities' received from Lodmell and email T. Gosau to confirm facts regarding Atlas Fund Trust and Atlas Fund Land Trust summarized by A&M's Tax Team.	0.20
04/15/25	JR	issue responses to consumer inquiries.	0.60
04/15/25	JR	assemble check and letter and send to A. Weyne.	0.40
04/16/25	VH	Email correspondence with former Constitution Ave tenant regarding delivery of security deposit check and signed copy of letter acknowledging and agreeing to same.	0.10
04/17/25	VH	Email correspondence with counsel from Stripe regarding follow up on status of inquires sent to Stripe back in February.	0.10
04/18/25	VH	Email correspondence with C. Chew regarding uploading recent court filings to the Receivership website.	0.20
04/18/25	VH	Email correspondence with K. Kent and R. Weiss regarding responding to Empire customer inquiry for status update.	0.60
04/18/25	CC	Maintained and updated the Empire Holdings Group Receivership website with relevant case documents, add new contents, and ensuring all updates were properly linked and accessible to the public.	0.70



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04/22/25	JR	review and submit payment regarding GoDaddy domain renewal.	0.30
04/24/25	VH	Confer with J. Russell regarding sending all emails sent out to customers from Receivership email address to former Empire customer inquiring about same, and strategy for compressing and sending all Empire training videos to former Empire customers who are requesting access to same.	0.20
04/25/25	RW	Call with K. Kent regarding P. Prusinowski vehicle trade-in request and call and leave message for A. Grier regarding same.	0.10
04/25/25	VH	Confer with R. Weiss regarding planned course of action for resolution of security deposit check issue raised by former Constitution Ave tenant.	0.10
04/25/25	RW	Call with A. Grier and R. McAuliffe regarding P. Prusinowski's request to sell vehicle.	0.20
04/25/25	RW	Review email from A. Weyne regarding check issue and call with V. Huber regarding same.	0.10
04/25/25	VH	Review email correspondence from former Constitution Ave tenant regarding issues with security deposit check and email K. Kent, R. Weiss, and J. Russell regarding same.	0.10
04/25/25	JR	review WSFS account regarding payment issues and emails to/from V. Huber and A. Santiago regarding check payment issues.	0.30
04/28/25	VH	Email correspondence with WSFS bankers regarding information to relay to former Constitution Ave tenant regarding depositing of security deposit check.	0.10
04/28/25	JR	emails to/from A. Maldonado regarding check issue.	0.30
04/29/25	VH	Email correspondence with former Constitution Ave tenant regarding deposit of security deposit check.	0.10
04/29/25	JR	review records and forward documents to T. Gosau regarding Empire Q1 25 Accounting.	1.10
04/30/25	VH	Confer with J. Russell regarding approval of positive pay for Constitution Ave security deposit check and discussion of potentially opening account with higher interest rate.	0.20



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04/30/25	JR	review WSFS account regarding positive pay approval and review and update transaction ledger.	0.60
05/01/25	VH	Confer with R. Weiss regarding strategy for outreach to counsel for Stripe regarding demand for response to prior inquiries made in February.	0.10
05/01/25	VH	Email correspondence with counsel from Stripe following up again on prior requests and indicating intent to seek court intervention if Stripe does not respond by May 9.	0.20
05/01/25	JR	finalize cover letter and assemble packet for TD Bank.	0.60
05/01/25	JR	phone call with TD Bank regarding confirmation of address regarding payment of Safety Deposit Box, and draft cover letter.	0.80
05/01/25	JR	review and pay mortgage and HOA regarding 6 Constitution Ave property.	0.50
05/01/25	RW	Call with V. Huber regarding plan for Stripe follow-up regarding return of funds and chargebacks.	0.10
05/02/25	JR	review WSFS account regarding ACH positive pay and email to K. Kent and R. Weiss regarding ACH positive pay approval.	0.20
05/05/25	VH	Email correspondence with K. Kent and R. Weiss [REDACTED]	0.10
05/05/25	VH	Confer with R. Weiss [REDACTED]	0.30
05/05/25	VH	Email correspondence with R. Weiss and K. Kent regarding [REDACTED]	0.20
05/05/25	VH	Confer with R. Weiss and counsel for FTC [REDACTED]	0.50
05/05/25	MM	Correspondence with one former customer regarding refunds and case status.	0.10



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05/05/25	JR	review WSFS account regarding ACH Positive Pay approval and email to K. Kent and R. Weiss regarding ACH Positive Pay approval	0.20
05/05/25	JR	review for water bill regarding Payment Due re Water for 6 Constitution Ave property.	0.30
05/05/25	RW	Review email from clerk regarding proposed stipulated order and calls with V. Huber, A. Grier, and R. McAuliffe regarding same.	0.60
05/06/25	VH	Email correspondence with J. Russell and R. Weiss regarding water bill for Constitution Ave property.	0.10
05/06/25	JR	review WSFS account regarding positive pay approval.	0.20
05/06/25	JR	review WSFS Account regarding Statement; download and circulate statement	0.20
05/06/25	JR	review account for water bill payment	0.30
05/06/25	RW	Call with V. Huber regarding plan for status conference.	0.20
05/06/25	RW	Review email from Judge's chambers regarding potential relinquishment of jurisdiction, call with A. Grier and R. McAuliffe regarding same and respond to same.	0.30
05/06/25	RW	Communicate with P. Prusinowski and T. Gosau regarding tax issues.	0.10
05/06/25	RW	Review request for status conference and email V. Huber, K. Kent, A. Grier and R. McAuliffe regarding same.	0.10
05/06/25	VH	Review email correspondence from court deputy regarding intent to schedule telephone conference and email K. Kent, R. Weiss, and FTC and defense counsel regarding same.	0.10
05/06/25	VH	Confer with R. Weiss regarding scheduling court telephone conference and strategy and plan for same.	0.20
05/06/25	RW	Further communications with Court and parties regarding status conference availability and scheduling.	0.20
05/07/25	VH	Draft non-consumer creditor notice of claims bar date and creditor claim form and send drafts to R. Weiss for review.	1.40



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05/07/25	VH	Review potential non-consumer creditor list and update information therein.	0.30
05/07/25	VH	Email correspondence with C. Chew regarding adding recent court filings to Receivership Website.	0.10
05/07/25	JR	review and submit payment re Sewer for 6 Constitution Ave.	0.40
05/07/25	JR	review and download Stripe balance summaries and forward to A. Mehta for review regarding Empire Q1 25 Accounting.	0.50
05/07/25	RW	Phone calls with V. Huber regarding plan for creditor claims form and process.	0.40
05/07/25	VH	Confer with R. Weiss regarding strategy for establishing creditor claims process, action items for winding down receivership, and preparation for forthcoming court telephone conference regarding court's retention of jurisdiction over the action until the conclusion of the receivership.	0.40
05/08/25	VH	Review and revise notice of non-consumer creditor claims procedure and claims bar date and send updated draft to R. Weiss and K. Kent for review.	0.20
05/08/25	VH	Review email correspondence from K. Kent and R. Weiss regarding tax returns for receivership entities and plan for future tax filings for same.	0.10
05/08/25	RW	Review and revise notice of claims procedure and email V. Huber regarding same.	0.30
05/08/25	RW	Call with K. Kent in preparation for conference with court.	0.20
05/08/25	RW	Call with V. Huber regarding plan for notice of claims procedure.	0.20
05/08/25	VH	Confer with R. Weiss regarding debriefing court telephone status conference and strategy [REDACTED]	0.30
05/08/25	RW	Call with A. Grier regarding position on jurisdiction in advance of status conference.	0.20



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05/08/25	VH	Email correspondence with K. Kent and R. Weiss [REDACTED]	0.10
05/08/25	RW	Attend hearing and status conference on final order.	0.30
05/08/25	VH	Appear for and attend court telephone conference regarding court's retention of jurisdiction pursuant to stipulated permanent injunction.	0.30
05/09/25	JR	further review of Stripe account regarding balance summaries and forward to A. Mehta regarding Empire Q1 25 Accounting.	0.30
05/09/25	JR	review WSFS account regarding positive pay approval and review and update transaction ledger.	0.20
05/09/25	VH	Confer with R. Weiss regarding strategy and plan for sending notice of claims process to all non-consumer creditors and plan for informing former Empire customers of case resolution and information for FTC consumer redress.	0.10
05/09/25	RW	Communicate with G. Christiansen and K. Kent regarding property retrieval.	0.10
05/09/25	RW	Review order directing Receiver to file subsequent status reports.	0.10
05/12/25	VH	Confer with R. Weiss regarding timing for review, finalization, and mailing out of non-consumer creditor claims process forms.	0.10
05/12/25	VH	Email correspondence with K. Kent regarding review and revisions to non-consumer creditor claims process forms.	0.10
05/12/25	JR	review payments and send out payments as directed.	0.60
05/13/25	VH	Review stipulated permanent injunction and other documents regarding receivership assets, draft list of all receivership action items to wind down receivership duties pursuant to the terms of the permanent injunction, and send action items list to R. Weiss and J. Russell.	2.50
05/13/25	JR	meeting with R. Weiss and V. Huber regarding Receivership Action Items.	0.80
05/13/25	RW	Review permanent injunction order and defendants' disclosures and summarize same for K. Kent regarding asset transition and turnover.	0.20



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05/13/25	RW	Email V. Huber regarding preparation of list of materials to be turned over to Receiver or returned to P. Prusinowski.	0.10
05/13/25	RW	Email K. Kent and V. Huber regarding immediate action items.	0.10
05/13/25	RW	Meet with V. Huber and J. Russell to discuss permanent injunction and plan for wind down.	0.80
05/13/25	VH	Confer with R. Weiss re scheduling Zoom call to discuss all Receivership action items in light of the entry of the stipulated permanent injunction.	0.20
05/13/25	VH	Attend Zoom call with R. Weiss and J. Russell regarding all Receivership wind down action items pursuant to stipulated permanent injunction.	0.80
05/13/25	RW	Email A. Grier and R. McAuliffe seeking clarity regarding coins to be kept by P. Prusinowski and person to whom consumer redress inquiries should be directed.	0.10
05/13/25	RW	Review and assess permanent injunction order to ascertain applicable dates for reporting.	0.20
05/14/25	VH	Attend Teams call with R. Weiss and A. Grier regarding receivership wind down and post-settlement tasks.	0.90
05/14/25	RW	Call with K. Kent regarding wind-down actions and plan for receipt of items from P. Prusinowski and coins, and email P. Prusinowski's counsel regarding same.	0.20
05/14/25	RW	Confer with V. Huber regarding next steps for wind-down.	0.10
05/14/25	VH	Confer with R. Weiss regarding debriefing Teams call with A. Grier and discussion of strategy and next steps for receivership wind down action items.	0.10
05/14/25	RW	Call with A. Grier and V. Huber regarding remaining tasks and plan for same.	0.90
05/15/25	VH	Draft cover letter for non-consumer creditor claim forms to be sent out to all non-consumer creditors, send draft letter to R. Weiss for review, email R. Weiss regarding same, and confer with J. Russell regarding mail merge for same.	0.70



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05/15/25	VH	Review and revise cover letters for non-consumer creditor claims process recipients and confer with R. Weiss and J. Russell regarding same.	0.80
05/15/25	VH	Revise, finalize, and compile all non-consumer credit claims form documents to be sent out to all non-consumer creditors with cover letter and send compiled documents to J. Russell.	0.30
05/15/25	VH	Review and update information in list of all potential non-consumer creditors and email R. Weiss regarding same.	0.50
05/15/25	VH	Email correspondence with J. Russell, K. Kent, and R. Weiss regarding information about prospective appraiser for gold coins.	0.10
05/15/25	VH	Email correspondence with K. Kent regarding review and approval of non-consumer creditor claim form documents.	0.10
05/15/25	MM	Correspondence with one former customer regarding refunds.	0.10
05/15/25	JR	begin review and assembly regarding Non-Consumer Creditor Claims.	2.30
05/15/25	JR	review and submit payment regarding Water bill for 6 Constitution Ave.	0.30
05/15/25	JR	review WSFS account regarding positive pay approval.	0.30
05/15/25	JR	various Phone call with Bucks County Rare Coin and emails to/from K. Kent, R. Weiss and V. Huber.	0.80
05/15/25	JR	phone call with V. Huber regarding non-consumer claim packets.	0.20
05/15/25	RW	Follow-up with V. Huber regarding coin issues and claim forms.	0.20
05/15/25	RW	Further communications with team regarding safe deposit box review and appraisal at TD Bank.	0.10
05/15/25	VH	Confer with R. Weiss regarding issues with coins to be given to P. Prusinowski in accordance with the terms of the Permanent Injunction Order.	0.30
05/15/25	VH	Confer with M. Mull regarding overview of receivership wind down action items in light of permanent injunction order and plan for responding to former Empire customers regarding consumer redress.	0.30
05/15/25	RW	Review consumer inquiry regarding redress;	0.10



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05/16/25	VH	Review and revise confirmation of surrender of assets document and send updated draft to R. Weiss and K. Kent for review.	0.20
05/16/25	VH	Review finalized non-consumer creditor claims process packets to be sent out to all non-consumer creditors and email J. Russell regarding same.	0.30
05/16/25	VH	Review email correspondence from R. Weiss regarding Constitution Ave property insurance information.	0.10
05/16/25	VH	Confer with J. Russell regarding finalizing and sending out non-consumer creditor claim forms.	0.20
05/16/25	RW	Prepare confirmation of surrender of assets and communicate with team regarding plan and details for same.	0.70
05/16/25	JR	assemble letter regarding non-consumer credit claim packets to consumers and forward to V. Huber for review.	1.40
05/16/25	JR	finalize packets and issue emails to Consumers regarding claims forms and emails to/from office services regarding mailings.	2.00
05/16/25	JR	review WSFS account regarding positive pay approval and review and update transaction ledger.	0.30
05/16/25	JR	assemble mailing list for non-consumer claim packets for Office Services.	0.30
05/16/25	JR	phone call to T. Koch with TD Bank and Michael Rain Coin regarding meeting regarding Safe Deposit Box	0.40
05/16/25	RW	Call with K. Kent regarding plan for sale of real and personal property and meeting at TD Bank for appraisal.	0.40
05/19/25	VH	Draft email to Empire customers regarding Permanent Injunction and consumer redress, send draft email to R. Weiss and the FTC for review, and email C. Chew regarding uploading Permanent Injunction onto Receivership Website.	0.70
05/19/25	VH	Draft description of non-consumer creditor claims process and claims bar date to be added to Receivership Website along with claims process packet and send draft description to R. Weiss for review.	0.40
05/19/25	VH	Review and update Receivership wind down action items list.	0.20



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05/19/25	VH	Email correspondence with C. Chew regarding uploading of notice of non-consumer creditor claims process forms with description of same to the Receivership Website as well as various modifications and changes to the homepage of the website.	0.50
05/19/25	VH	Email correspondence with R. Weiss and J. Russell regarding Fidelity account notice of wire transfer and confirmation of same as account with assets to be transferred to the FTC pursuant to the Permanent Injunction.	0.20
05/19/25	VH	Confer with R. Weiss regarding updates and changes to be made to homepage of Receivership Website in light of current case status.	0.10
05/19/25	VH	Email correspondence with K. Kent and R. Weiss regarding coin appraisal and exchange and collection of receivership assets with P. Prusinowski.	0.10
05/19/25	VH	Confer with R. Weiss and K. Kent regarding P. Prusinowski's receivership assets to be given to the receiver, and confer with R. Weiss review of draft email to Empire customers and draft description of non-consumer creditor claims process to be added to receivership website.	0.20
05/19/25	JR	review fidelity account.	0.20
05/19/25	JR	review and forward draft confirmation of surrender to K. Kent and R. Weiss for review.	0.30
05/19/25	JR	assemble and forward all issued mass emails to customers to V. Huber.	0.20
05/19/25	JR	review WSFS account regarding positive pay approval and review and update transaction ledger.	0.20
05/19/25	RW	Emails with K. Kent and J. Russell regarding arrangements for safe deposit box.	0.30
05/20/25	VH	Review and update receivership wind down action items list and confer with R. Weiss regarding same.	0.40
05/20/25	JR	update wind-down action Items list	0.10
05/20/25	JR	review and prepare deposit regarding check payment.	0.40
05/20/25	JR	email to M. Levin regarding Wire Instructions regarding payment from appraisal.	0.20



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05/20/25	JR	update confirmation of surrender of assets, forward to P. Prusinowski and G. Christiansen,	0.40
05/21/25	VH	Review prior email correspondence with K. Kent and R. Weiss [REDACTED] and email R. Weiss and M. Mull regarding same.	0.30
05/21/25	MM	Zoom conference with K. Kent, R. Weiss, V. Huber, and J. Russell regarding winding receivership winding down.	0.80
05/21/25	VH	Email correspondence with C. Chew regarding changes and updates to be made to receivership website.	0.40
05/21/25	VH	Attend Zoom call with R. Weiss regarding review of receivership website and discussion of changes and updates to be made to same.	0.20
05/21/25	VH	Review Receivership bank account transaction ledger and confer with J. Russell to confirm transactions in same, and email T. Gosau regarding description of certain payments and deposits from receivership bank account for accounting purposes.	0.40
05/21/25	JR	update wind down memo	0.70
05/21/25	JR	Attend meeting to discuss wind-down tasks and plan.	1.00
05/21/25	VH	Review and update receivership wind down action items list.	0.30
05/21/25	RW	Meet with V. Huber to discuss updates to Receivership website.	0.20
05/21/25	VH	Attend Zoom call with K. Kent, R. Weiss, M. Mull, and J. Russell regarding overview of and strategy for all receivership wind down action items.	1.00
05/21/25	RW	Meet with K. Kent, V. Huber, M. Mull and J. Russell to discuss wind-down action items.	1.00
05/21/25	RW	Call with realtor regarding next steps.	0.30
05/21/25	RW	Call with potential realtor regarding Constitution Ave property.	0.50



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05/22/25	VH	Email correspondence with C. Chew regarding further updates and changes to Receivership website.	0.20
05/22/25	JR	review WSFS account and update transaction ledger	0.30
05/22/25	JR	update pdfs and records folder regarding non-consumer creditor claims.	0.50
05/22/25	RW	Communicate with team regarding and research options for lawn maintenance at Constitution Ave Property.	0.20
05/22/25	VH	Draft motion to enforce Permanent Injunction Order provision requiring Stripe to turn over Receivership assets.	3.10
05/22/25	VH	Confer with R. Weiss regarding motion to enforce Stripe's compliance with Preliminary and Permanent Injunctions.	0.10
05/23/25	MM	Correspondence with one former customer regarding Empire Holdings Group operations and continued outreach.	0.10
05/23/25	RW	Call with V. Huber regarding plan for motion to enforce and motion to sell real property.	0.30
05/23/25	VH	Draft motion to enforce Stripe's compliance with stipulated preliminary and permanent injunctions and send draft to R. Weiss for review.	2.00
05/23/25	VH	Begin drafting motion for approval of procedure for sale of Constitution Ave property.	1.30
05/23/25	VH	Draft affidavit of non-compliance to append to motion to enforce Stripe's compliance with court orders and send same to R. Weiss for review.	1.30
05/23/25	VH	Confer with R. Weiss regarding motion for approval of procedure for sale of Constitution Ave property and revisions to motion to enforce Stripe's compliance with court orders.	0.30
05/26/25	RW	Follow-up with A. Winner regarding status of locating landscaping company to address lawn at 6 Constitution Avenue property.	0.10
05/27/25	VH	Draft response to J. Nadar regarding deficient non-consumer creditor claim submission and send draft response to R. Weiss and K. Kent for review.	0.50



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05/27/25	VH	Review document submitted by J. Nadar for non-consumer creditor claims process and email R. Weiss and K. Kent regarding same.	0.40
05/27/25	VH	Review American Express's submitted non-consumer creditor claim submission, draft notes regarding same, and send notes to R. Weiss for review.	1.20
05/27/25	VH	Email correspondence with R. Weiss and J. Russell regarding access to consumer questionnaires to the FTC and review and compilation of submitted non-consumer creditor claims.	0.20
05/27/25	VH	Email correspondence with FTC counsel regarding access to consumer questionnaires submitted by former Empire customers.	0.10
05/27/25	JR	review box folder regarding access for R. McAuliffe and A. Grier regarding forward link to V. Huber.	0.30
05/27/25	RW	Review and assess non-consumer claim submission from Jijo Nadar and email team regarding same.	0.20
05/27/25	RW	Communicate with A. Winner regarding efforts to locate lawn care company to mow 6 Constitution Ave property.	0.10
05/27/25	VH	Draft argument section regarding Section 2001 in motion for approval of procedure for sale of Constitution Ave property and send draft to R. Weiss for review and further input.	1.50
05/28/25	RW	Review and revise motion to enforce against Stripe and email V. Huber regarding same.	0.30
05/29/25	VH	Review and analyze non-consumer creditor claim form and additional documentation submitted by J. Nadar and email R. Weiss and K. Kent regarding same.	0.90
05/29/25	VH	Review and update receivership wind down action items list.	0.20
05/29/25	VH	Review emails from J. Nadar regarding explanation of claim amount requested and additional documentation submitted in connection with same, and confer with R. Weiss regarding same and response thereto.	0.60
05/29/25	RW	Emails with V. Huber regarding proposed response to Jijo regarding deficiencies in claim form.	0.10



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05/29/25	RW	Call with V. Huber regarding motion to enforce against Stripe and response to Jijo.	0.50
05/29/25	VH	Review and revise motion to enforce Stripe's compliance with court orders and send updated draft to R. Weiss and K. Kent for review.	1.10
05/29/25	RW	Review updates to motion to enforce against Stripe and propose revisions to same.	0.10
05/29/25	VH	Confer with R. Weiss regarding revisions to motion to enforce Stripe's compliance with court orders.	0.10
05/29/25	VH	Email correspondence with K. Kent regarding motion to enforce Stripe's compliance with court orders.	0.10
05/29/25	VH	Confer with R. Weiss regarding inclusion of request for attorney fees in motion to enforce Stripe's compliance with court orders (NO CHARGE 0.2).	0.20
05/29/25	VH	Confer with K. Kent regarding request for attorney fees in motion to enforce Stripe's compliance with court orders (NO CHARGE 0.2).	0.20
05/30/25	RW	Call with V. Huber regarding amendments to motion to enforce against Stripe.	0.20
05/30/25	VH	Review and revise request for attorney fees in motion to enforce Stripe's compliance with court orders and send updated draft to R. Weiss for review (NO CHARGE 0.1).	0.10
05/30/25	VH	Revise and finalize motion to enforce Stripe's compliance with court orders and send same to L. Doyle for filing.	0.40
05/30/25	RW	Review updated motion to enforce against Stripe for failure to comply with TRO and PI.	0.10
05/30/25	VH	Confer with R. Weiss regarding revisions to request for attorney fees in motion to enforce Stripe's compliance with court orders (NO CHARGE 0.2).	0.20
06/02/25	VH	Review and update receivership wind down action items list.	0.30
06/02/25	VH	Email correspondence with K. Walsh and A. Winner regarding landscaping services for maintenance of Constitution Ave property.	0.10



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06/02/25	VH	Email correspondence with counsel for American Express regarding receipt of non-consumer creditor claim submissions.	0.10
06/02/25	JR	Emails to/from V. Huber regarding notices folder and update notices folder regarding non-consumer creditor claims.	0.20
06/02/25	VH	Email correspondence with R. Weiss regarding motion for approval of sale procedure for Constitution Ave property.	0.10
06/03/25	VH	Confer with J. Russell regarding receivership wind down action items list and completion of tasks therein.	0.10
06/03/25	JR	Review and submit payments regarding Mortgage and HOA regarding 6 Constitution Ave property and update transaction ledger.	0.40
06/03/25	JR	Review WSFS Account regarding ACH positive pay and email findings to K. Kent and R. Weiss.	0.20
06/04/25	VH	Review non-consumer creditor claims form submitted by P. Morana and save same to file.	0.20
06/04/25	VH	Email correspondence with J. Russell regarding Constitution Ave property mortgage and HOA payments.	0.10
06/04/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding HOA payment regarding 6 Constitution Ave property.	0.20
06/04/25	RW	Review order granting motion to enforce against Stripe.	0.10
06/04/25	VH	Review court order granting motion to enforce Stripe's compliance with court orders, email R. Weiss regarding same, and serve same on Stripe's counsel.	0.30
06/05/25	VH	Confer with counsel from Stripe regarding banking information for wire transfer of funds to Receivership Account.	0.10
06/05/25	JR	Download and forward Amex and Fidelity Statements to P. Prusinowski and G. Christiansen	0.20
06/05/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding mortgage payment regarding 6 Constitution Ave property.	0.20



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06/05/25	JR	Review WSFS account, download and forward statement to R. Weiss, K. Kent, V. Huber, M. Mull, A. Grier, R. McAuliffe, G. Christiansen, and S. McBrearty.	0.20
06/05/25	VH	Draft R. Weiss declaration evidencing time spent preparing motion to enforce Stripe's compliance with court orders to submit to the court for request for attorney fees and send draft declaration to R. Weiss for review (NO CHARGE 0.9).	0.90
06/06/25	VH	Draft letter to collection agency regarding notice of receivership and prohibition on debt collection attempts on behalf of Stripe and send draft letter to R. Weiss for review.	0.70
06/06/25	VH	Revise and finalize response letter to collection agency attempting to collect debt on behalf of Stripe and send same to collection agency and to Stripe.	0.50
06/06/25	VH	Update list of potential non-consumer creditors to include collection agency attempting to collect debt on behalf of Stripe.	0.20
06/06/25	VH	Review email and letter from collection agency attempting to collect outstanding balance from the EEB Stripe account and email R. Weiss regarding preparing response letter to same.	0.10
06/06/25	VH	Email correspondence with J. Russell regarding incoming wire transfer from Stripe.	0.10
06/06/25	VH	Email correspondence with R. Weiss regarding Morana Enterprises non-consumer creditor claim submission.	0.10
06/06/25	VH	Confer with R. Weiss regarding response letter to collection agency attempting to collect debt on behalf of Stripe.	0.10
06/06/25	RW	Review collection notice from Stripe and email V. Huber regarding same.	0.10
06/06/25	RW	Review letter to collection agency regarding Stripe and call with V. Huber regarding same.	0.10
06/06/25	RW	Communicate with team regarding landscaping contract for Constitution Ave property.	0.10
06/09/25	VH	Email correspondence with J. Russell regarding expected incoming wire from Stripe into the Receivership Account.	0.10



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06/09/25	VH	Confer with R. Weiss regarding motion for approval of sale procedure for Constitution Ave property and plan for analyzing submitted claims after non-consumer creditor claims bar date.	0.10
06/09/25	JR	Review WSFS account regarding incoming wire from Stripe and email to V. Huber regarding wire from Stripe.	0.10
06/09/25	JR	Review insurance policy website regarding 6 Constitution Ave property and forward findings to R. Weiss, V. Huber, and K. Kent.	0.40
06/09/25	JR	Review for water bill regarding Payment Due re Water for 6 Constitution Ave property.	0.40
06/09/25	RW	Review and revise declaration in support of request for attorney fees in accordance with Court's order on motion to enforce against Stripe (NO CHARGE - 0.2).	0.20
06/09/25	RW	Prepare portions of motion regarding stipulated procedure to sell Constitution Ave property and email V. Huber regarding same.	2.20
06/09/25	VH	Review and revise R. Weiss declaration regarding attorney fees incurred preparing motion to enforce Stripe's compliance with court orders and send updated draft to R. Weiss (NO CHARGE 0.3).	0.30
06/09/25	VH	Review and revise motion for approval of sale procedure for Constitution Ave property and send updated draft to R. Weiss for review.	1.70
06/09/25	RW	Review V. Huber revisions to motion to approve stipulation for sale of real property and further revise same.	0.30
06/10/25	VH	Review and update receivership wind down action items list.	0.30
06/10/25	VH	Email correspondence with C. Chew regarding uploading recent court filings onto receivership website.	0.10
06/10/25	VH	Email correspondence with counsel for Stripe regarding Stripe informing collection agency to cease collection efforts related to EEB Stripe Account.	0.10
06/10/25	JR	Email to T. Koch at TD Bank regarding safe deposit keys.	0.10
06/10/25	CC	Maintained and updated the Empire Holdings Group Receivership website with relevant case documents, add new contents, and ensuring all updates were properly linked and accessible to the public.	0.20



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06/10/25	VH	Review and revise motion for approval of sale procedure for Constitution Ave property and send updated draft to R. Weiss for review.	1.30
06/10/25	VH	Revise and finalize R. Weiss declaration regarding attorney fees incurred in connection with motion to enforce Stripe's compliance with court orders and same same to R. Weiss for filing (NO CHARGE 0.2).	0.20
06/10/25	RW	Review and finalize declaration regarding attorney fees incurred in connection with Stripe motion (NO CHARGE 0.1).	0.10
06/10/25	RW	Call with K. Kent regarding motion for sale of Constitution Ave property.	0.20
06/10/25	VH	Confer with R. Weiss regarding revisions to motion for approval of sale procedure for Constitution Ave property.	0.10
06/10/25	RW	Review and finalize updates to motion regarding Constitution Ave Property and email K. Kent and J. Short regarding same.	0.20
06/11/25	VH	Confer with J. Russell regarding checking Receivership account for expected incoming wire transfer from Stripe.	0.10
06/11/25	VH	Email correspondence with counsel from Stripe regarding status of wire transfer of balance of Storefunnels Stripe account to the Receivership account.	0.20
06/11/25	JR	Review WSFS account regarding stripe wire payment.	0.10
06/11/25	JR	Draft cover letter and FedEx label to T. Koch regarding TD Bank safe deposit box key.	0.60
06/11/25	VH	Review and revise motion to approve sale procedure for Constitution Ave property and send updated draft to R. Weiss for review.	0.30
06/12/25	VH	Review P. Prusinowski email request to change Fidelity account password and review analyze request in conjunction with provisions of stipulated permanent injunction.	0.20
06/12/25	VH	Confer with R. Weiss regarding email from counsel for Celsius regarding unclaimed distribution of funds and response to same.	0.20



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06/12/25	VH	Confer with R. Weiss regarding Stripe's payment of attorney fees incurred in connection with motion to enforce Stripe's compliance with court orders (0.2 NO CHARGE), P. Prusinowski request to change Fidelity account password, and revisions to motion for approval of sale procedure for Constitution Ave property (0.2).	0.20
06/12/25	VH	Review court order directing Stripe to pay attorney fees to the Receiver for fees incurred in connection with the motion to enforce Stripe's compliance with court orders and email Stripe's counsel regarding same (NO CHARGE 0.4).	0.40
06/12/25	JR	Review Fidelity account access and email to R. Weiss to confirm access.	0.10
06/12/25	JR	Review WSFS account regarding stripe wire payment.	0.10
06/12/25	JR	Download and forward Amex statements to P. Prusinowski and G. Christiansen.	0.30
06/12/25	RW	Call with V. Huber regarding stripe payment of attorney's fees (NO CHARGE - 0.2) and motion regarding Constitution Ave property (0.2).	0.20
06/12/25	RW	Respond to counsel for Celsius regarding status and call with V. Huber regarding same.	0.20
06/12/25	RW	Review updates to proposed motion and stipulation regarding 6 Constitution Avenue property and email A. Grier and R. McAuliffe regarding same.	0.10
06/12/25	RW	Review order granting attorney's fees in connection with Stripe motion (NO CHARGE - 0.1).	0.10
06/13/25	VH	Email correspondence with J. Russell and R. Weiss regarding status of incoming wire from Stripe into receivership account and subsequent email and telephone call with counsel for Stripe regarding same.	0.30
06/13/25	VH	Telephone call with counsel from Stripe regarding status of wire transfer of balance of Storefunnels Stripe Account to the Receivership account and payment of attorney fees incurred in connection with same.	0.10
06/13/25	VH	Email correspondence with Stripe's counsel regarding status of wire transfer of balance of Storefunnels Stripe Account to the Receivership Account.	0.20
06/13/25	JR	Review WSFS account regarding Wire from Stripe and email to V. Huber and R. Weiss regarding stripe payment.	0.10



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06/13/25	RW	Communicate with V. Huber regarding follow-up with Stripe regarding payment.	0.10
06/16/25	VH	Email correspondence with J. Russell regarding status of incoming wire transfer from Stripe into Receivership Account and email counsel for Stripe regarding confirmation of receipt of same.	0.10
06/16/25	VH	Email correspondence with R. Weiss regarding notice of non-consumer creditor claims process sent to T. Alrefae.	0.10
06/16/25	JR	Review WSFS account regarding Stripe Inc Wire payment and email findings to V. Huber and update transaction ledger.	0.20
06/16/25	RW	Communicate with P. Prusinowski regarding request for access to Fidelity account.	0.10
06/16/25	RW	Email defense counsel regarding proposed stipulation to sell Constitution Ave Property.	0.10
06/17/25	VH	Confer with J. Russell regarding non-consumer creditor claim submissions and responding to former Empire customer email inquiries.	0.20
06/17/25	VH	Review email from Stripe's counsel regarding payment of attorney fees to the Receiver and email R. Weiss regarding response to same (NO CHARGE 0.1).	0.10
06/17/25	VH	Review email correspondence from FTC counsel regarding confirmation of current receivership assets.	0.10
06/17/25	VH	Review email from J. Nadar regarding non-consumer creditor claim submission and respond to same.	0.10
06/17/25	RW	Communicate with R. McAuliffe regarding receivership assets.	0.10
06/18/25	VH	Email correspondence with J. Russell regarding Empire customer email inquiries and responses thereto.	0.10
06/18/25	JR	Review receivership inbox and draft responses and forward to V. Huber for review.	2.70
06/18/25	RW	Email counsel for Stripe with instructions regarding payment (NO CHARGE - 0.1).	0.10



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06/20/25	RW	Email P. Prusinowski regarding Fidelity account.	0.10
06/23/25	JR	Review receivership inbox regarding inquiries and issue responses to consumers.	1.20
06/23/25	VH	Review and prepare responses to former Empire customer inquiries sent to receivership email and send draft responses to J. Russell.	1.00
06/23/25	VH	Review email from Barlow Consulting regarding tax filings for Empire 401k plan and email K. Kent and R. Weiss regarding plan for responding to and handling same.	0.10
06/23/25	JR	Submit payment regarding NWWA bill regarding 6 Constitution Ave Property.	0.30
06/23/25	JR	Update Fidelity account.	0.40
06/23/25	RW	Communicate with P. Prusinowski and J. Russell regarding North Wales Water Authority bill.	0.10
06/23/25	RW	Email P. Prusinowski regarding reach-out from purported 401K consultant.	0.10
06/24/25	VH	Review and update receivership wind down action items list and email J. Russell regarding action items related to Empire Partner and Empire Realty TD Bank accounts.	0.40
06/24/25	VH	Search and review documents in FTC Relativity database regarding Empire 401k plan administration and tax form filings, pull and review relevant documents, and send same to R. Weiss [REDACTED]	0.80
06/24/25	VH	Confer with R. Weiss regarding Barlow Consulting email regarding Empire 401k tax filings and prior work performed for same, draft response email to same, send draft response email to R. Weiss for review, and send final approved response email to Barlow Consulting.	0.50
06/24/25	VH	Confer with R. Weiss regarding plan for transfer of funds from Empire Partner TD and PayPal accounts in light of continued accrual of funds therein.	0.10
06/24/25	VH	Email correspondence with R. Weiss regarding status of defense counsel review and approval of stipulated procedure for sale of Constitution Ave property.	0.10



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06/24/25	RW	Confer with V. Huber regarding plan for account balances in remaining accounts.	0.10
06/24/25	RW	Review email from P. Prusinowski regarding 401K provider for Empire and email V. Huber regarding same.	0.10
06/24/25	RW	Confer with V. Huber regarding plan for responding to Barlow claim.	0.10
06/24/25	RW	Follow up with G. Christiansen regarding motion to sell 6 Constitution Ave Property.	0.10
06/24/25	RW	Email T. Gosau regarding tax issues relating to 401K services.	0.10
06/24/25	VH	Draft fourth status report to the court.	1.90
06/25/25	VH	Review documentation received from Barlow Consulting and all non-consumer creditor claim submissions in preparation for Zoom call with R. Weiss to discuss strategy for handling same.	0.40
06/25/25	VH	Email correspondence with R. Weiss regarding Barlow Consulting documentation regarding Empire 401k plan administration and analysis of submitted non-consumer creditor claims.	0.20
06/25/25	VH	Confer with J. Russell regarding working with TD Bank to transfer balances of Empire Realty and Empire Partner bank accounts to the Receivership account.	0.20
06/25/25	VH	Email correspondence with R. Weiss and K. Kent regarding A&M's response regarding 5500 tax forms for Empire's 401k plan administration and [REDACTED]	0.10
06/25/25	VH	Email correspondence with counsel for Stripe regarding status of attorney fee payment to the receiver (NO CHARGE 0.1).	0.10
06/25/25	RW	Communicate with P. Prusinowski and J. Russell regarding transfer of Betterment account balance.	0.20
06/25/25	JR	Review records regarding Betterment account and email to R. Weiss regarding Betterment account.	0.20
06/25/25	JR	Review paypal account regarding balance and forward balance to R. Weiss, and review WSFS records and email to WSFS regarding new account.	0.70



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06/25/25	JR	Review received refund check from TD Bank regarding Safety Deposit Box and update transaction ledger.	0.50
06/25/25	RW	Review email from T. Gosau regarding 401 K related tax services and email K. Kent and V. Hube regarding handling of same.	0.10
06/25/25	RW	Meet with V. Huber to discuss creditor claim submissions and plan for addressing same.	1.00
06/25/25	RW	Meet with V. Huber and K. Kent regarding plan for handling creditor claims.	0.30
06/25/25	VH	Attend Zoom call with K. Kent and R. Weiss regarding planned strategy for responding to Barlow Consulting regarding 401k plan administration and responding to each non-consumer creditor claim submission.	0.30
06/25/25	VH	Attend Zoom call with R. Weiss regarding discussion of Barlow Consulting plan administration for Empire's 401k plan, payment for prior work performed thereto, and strategy for future work, and review of all non-consumer creditor claim submissions and strategy for responding to same.	1.00
06/25/25	RW	Email counsel for PayPal to request transfer of Empire Partner account balance to Receiver.	0.10
06/26/25	VH	Draft response letters to non-consumer creditor claimants and send drafts to R. Weiss for review.	1.60
06/26/25	VH	Review American Express non-consumer creditor claim submissions, determine and prepare spreadsheet of claim calculations excluding charges after entry of TRO, and send same to R. Weiss.	1.40
06/26/25	VH	Email correspondence with K. Kent and J. Russell regarding former Empire customer inquiry regarding consumer redress and response to same.	0.20
06/26/25	RW	Review and revise proposed claims determination letters and communicate with V. Huber regarding same.	0.70
06/26/25	JR	Review draft responses and email findings to V. Huber.	0.40
06/26/25	RW	Communicate with P. Prusinowski, V. Huber and G. Christiansen regarding Betterment Securities account to be transferred to FTC.	0.20



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06/26/25	VH	Confer with R .Weiss regarding timing of submissions of future status reports, the final report, and other future filings based on procedure for same set forth in the stipulated permanent injunction.	0.10
06/27/25	VH	Review and revise draft response letters to non-consumer creditor claim submissions and send updated drafts to R. Weiss for review.	0.70
06/27/25	VH	Email correspondence with J. Russell and with counsel from Stripe regarding status of incoming wire transfer of attorney fees from Stripe.	0.20
06/27/25	JR	Review WSFS account regarding stripe wire payment.	0.10
06/27/25	JR	Phone call with R. Abbott regarding WSFS account.	0.10
06/27/25	RW	Prepare confirming email to B. Barlow regarding agreement on 401K plan administration and wind-down.	0.20
06/27/25	RW	Call with B. Barlow regarding plan administration services to be provided for wind-down of 401K and preparation of necessary tax documents.	0.30
06/27/25	VH	Continue drafting fourth written report to the court.	1.10
06/30/25	VH	Review and revise response letters to non-consumer creditor claim submissions and send same to K. Kent for review.	0.30
06/30/25	VH	Review and revise response letters to non-consumer creditor claim submissions and send same to K. Kent for review.	0.20
06/30/25	VH	Review K. Kent revisions and comments on draft response letter to non-consumer creditor claim submissions and email R. Weiss regarding same.	0.10
06/30/25	VH	Email correspondence with R. Weiss regarding proposed course of action for Empire social media accounts in light of wind down of receivership.	0.20
06/30/25	VH	Email correspondence with J. Russell regarding status of incoming attorney fee wire transfer from Stripe into Receivership Account (NO CHARGE 0.1).	0.10
06/30/25	JR	Review WSFS account regarding stripe payment and email to V. Huber regarding stripe payment.	0.20
06/30/25	VH	Review and update receivership wind down action items list.	0.20



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06/30/25	RW	Communicate with V. Huber regarding plan for Empire social media accounts.	0.10
06/30/25	RW	Follow-up with team regarding insurance policy renewal for Constitution Avenue Property.	0.10
06/30/25	RW	Review and further revise responses to claim submissions and e-mail V. Huber regarding same.	0.20
06/30/25	VH	Continue drafting fourth written report to the court.	0.20
06/30/25	VH	Continue drafting fourth written report to the court.	0.90
06/30/25	RW	Follow-up email to G. Christiansen regarding Constitution Ave motion.	0.10
07/01/25	VH	Prepare Tax Form 56 for Empire Realty and send to mailroom for mailing out to the IRS.	0.40
07/01/25	VH	Revise, finalize, and send out letters responding to non-consumer creditor claim submissions from J. Nadar, P. Morana, and American Express.	0.70
07/01/25	VH	Confer with R. Weiss regarding ownership interest of Constitution Ave property.	0.10
07/01/25	JR	review account and pay Mortgage and HOA fee for 6 Constitution Ave property.	0.50
07/01/25	JR	Confer with V. Huber regarding mail forwarding regarding Empire Realty entity.	0.10
07/01/25	JR	Emails to/from R. Weiss regarding payments regarding 6 Constitution Ave Property.	0.10
07/01/25	JR	confer with K. Walsh regarding mail forwarding and email to K. Walsh and V. Huber regarding same	0.10
07/01/25	JR	Review WSFS account regarding Stripe payment and email to V. Huber regarding payment status.	0.10
07/01/25	RW	Review K. Kent comments to creditor claim response letters and email K. Kent and V. Huber regarding same.	0.20



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07/01/25	VH	Confer with R. Weiss and J. Russell regarding tax form 56 and mail forwarding for Empire Realty, and payment of utilities, insurance, and other bills for the Constitution Ave property.	0.40
07/01/25	RW	Review email from G. Christiansen regarding tax liabilities for 6 Constitution Ave Property and email T. Gosau regarding same.	0.10
07/01/25	RW	Email T. Gosau regarding plans for sale of Constitution Ave property and ownership of same to determine tax implications.	0.10
07/02/25	VH	Email correspondence with K. Walsh regarding Empire Realty mail forwarding.	0.10
07/02/25	VH	Email correspondence with counsel from Stripe regarding status of attorney fee wire transfer (NO CHARGE 0.1).	0.10
07/02/25	JR	review property insurance for payment and phone call with R. Weiss regarding policy and phone call to Insurance Agent regarding update to policy.	0.50
07/02/25	JR	Review WSFS account regarding Stripe payment and forward findings to V. Huber (NO CHARGE 0.1).	0.10
07/02/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding HOA payment regarding 6 Constitution Ave property.	0.20
07/02/25	RW	Call with J. Russell regarding Constitution Ave insurance policy renewal.	0.20
07/03/25	VH	Review reply letter from counsel for American Express regarding agreement to receiver's reduced calculation of non-consumer creditor claim submission and email R. Weiss and K. Kent regarding same.	0.10
07/03/25	RW	Review response from AMEX regarding creditor claim.	0.10
07/03/25	RW	Communicate with T. Gosau and G. Christiansen regarding sale of 6 Constitution Ave Property.	0.10
07/07/25	VH	Email correspondence with M. Mull regarding former Empire customer inquiry and response to same.	0.20
07/07/25	VH	Confer with R. Weiss regarding [REDACTED]	0.20



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07/07/25	MM	Correspondence with one former customer regarding status of lawsuit and potential refunds.	0.10
07/07/25	JR	submit sewer bill payment regarding 6 Constitution Ave property and update transaction ledger.	0.40
07/07/25	RW	Call with V. Huber regarding [REDACTED]	0.20
07/07/25	RW	Review email from Alvarez and Marsal [REDACTED] and email T. Gosau regarding same.	0.10
07/07/25	RW	Email G. Christiansen regarding signing of stipulation for sale of Constitution Ave Property.	0.10
07/08/25	JR	phone call with A. Campbell with insurance company regarding new policy re 6 Constitution Ave property.	0.20
07/08/25	RW	Confer with K. Kent regarding Constitution Ave property and tax issues.	0.10
07/08/25	RW	Review final signed stipulation re Constitution Ave property and email K. Kent and V. Huber regarding timing of filing same.	0.10
07/08/25	RW	Emails with counsel regarding signatures on proposed stipulation.	0.10
07/09/25	VH	Attend Teams call with K. Kent, R. Weiss, and A&M tax team regarding forthcoming sale of Constitution Ave property and [REDACTED] and other general tax matters for receivership estate.	0.70
07/09/25	JR	phone call with A. Campbell regarding insurance coverage for 6 Constitution Ave property and email to R. Weiss regarding same.	0.20
07/09/25	JR	Review WSFS account and check payment regarding Barlow Consulting and update transaction ledger.	0.40
07/09/25	RW	Follow-up with J. Russell regarding placement of insurance coverage for 6 Constitution Ave property.	0.10
07/09/25	RW	Contact insurance broker regarding request for coverage for Constitution Ave Property.	0.10



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07/09/25	RW	Review proposed tax forms and plan docs from B. Barlow for Empire Holdings 401K and propose revisions to same.	0.20
07/09/25	RW	Prepare email to insurance agent summarizing coverage details for 6 Constitution Avenue Property.	0.30
07/09/25	RW	Meet with K. Kent, V. Huber, and Alvarez and Marsal tax team to discuss plan for tax filings.	0.70
07/09/25	VH	Continue drafting fourth status report to the court.	1.40
07/09/25	VH	Review Judge specific preferences for any instructions regarding stipulation submissions and email R. Weiss regarding same.	0.20
07/10/25	VH	Email correspondence with K. Kent and J. Russell regarding responding to former Empire customer inquiry.	0.10
07/10/25	VH	Review and compile Empire Realty formation documentation, send same to A&M, and email A&M and R. Weiss regarding assets held by Empire Realty and date of Constitution Ave conveyance to Empire Realty.	0.20
07/10/25	JR	Emails to/from R. Weiss and K. Kent regarding WSFS savings account.	0.20
07/10/25	JR	review mortgage website for 6 Constitution Ave and forward findings to R. Weiss.	0.70
07/10/25	JR	emails to/from V. Huber regarding response to customer and regarding customer email list and forward findings and draft response to V. Huber for review	0.40
07/10/25	JR	Prepare receivership email responses.	0.70
07/10/25	RW	Review trust documents and communicate with insurance agent regarding details for insurance coverage for Constitution Ave property.	0.30
07/10/25	RW	Continued communications with insurance agent, K. Kent, and J. Russell regarding insurance renewal for Constitution Ave property and review quotes for same.	0.40
07/11/25	VH	Review email from J. Palacios regarding overview of Empire Realty formation and ownership of Constitution Ave property for tax analysis and send lease agreement and other documentation evidencing rental of property in 2024.	0.30



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07/11/25	JR	emails to K. Kent and K. Koenig regarding set-up of Receivership savings account.	0.10
07/11/25	JR	continue review of receivership inbox	1.10
07/11/25	RW	Review tax assessor's website for 6 Constitution Ave property and email team regarding obtaining tax bill and submitting to mortgage company for payment.	0.20
07/11/25	RW	Communicate with insurance agent and K. Kent regarding binding of and payment for insurance for 6 Constitution Avenue.	0.10
07/14/25	VH	Review and revise draft email responses to former Empire customer inquiries and send revised responses to J. Russell.	0.40
07/14/25	JR	Download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.20
07/14/25	VH	Confer with R. Weiss regarding status of fourth written report to the court.	0.10
07/16/25	JR	Issue responses to inquiries in receivership inbox.	0.80
07/16/25	JR	review mortgage account regarding tax payment from escrow and forward findings to R. Weiss and K. Kent.	0.30
07/16/25	RW	Review tax bill and communicate with team regarding payment of same.	0.10
07/16/25	RW	Communicate with J. Russell regarding payment of tax bill.	0.10
07/17/25	JR	review mortgage website and contact mortgage company regarding school tax issue.	0.60
07/17/25	RW	Follow-up with Alvarez and Marsal tax team regarding explanation of plans for tax treatment for P. Prusinowski.	0.10
07/17/25	RW	Email P. Prusinowski regarding submission of tax bill to mortgage company.	0.10
07/18/25	JR	review WSFS account regarding positive pay approval email to K. Kent and R. Weiss regarding approval.	0.20



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07/18/25	RW	Review email from J. Palacios [REDACTED] and consider and respond to same.	0.20
07/21/25	RW	Review signature pages on 401K plan documents and communicate with K. Kent and J. Russell regarding same.	0.10
07/21/25	RW	Review summary from tax team [REDACTED] and email G. Christiansen and P. Prusinowski regarding same.	0.30
07/22/25	VH	Review A&M summary [REDACTED]	0.20
07/22/25	VH	Confer with R. Weiss regarding tax information regarding the receivership entities, next steps for filing motion for approval of sale procedure for Constitution Ave property, and other receivership wind down action items.	0.10
07/22/25	VH	Email correspondence with M. Mull regarding email from former Empire customer and responding to same.	0.30
07/22/25	RW	Call with V. Huber regarding 6 Constitution Ave property, tax issues, and status report.	0.10
07/22/25	RW	Review letter from mortgage company to P. Prusinowski and email with team regarding same.	0.20
07/22/25	VH	Email correspondence with R. Weiss, K. Kent, and J. Russell regarding letter from Mr. Cooper regarding Constitution Ave property changed from being in Peter's name to Empire Realty and course of action for handling same.	0.10
07/22/25	VH	Continue drafting fourth written report to the court.	2.80
07/23/25	RW	Call with K. Kent regarding plan for addressing mortgage company inquiry for 6 Constitution Ave property.	0.10
07/23/25	RW	Call with V. Huber regarding status report and planned response to mortgage company.	0.50
07/23/25	VH	Confer with R. Weiss regarding strategy for communications with Mr. Cooper regarding mortgage payments for Constitution Ave property.	0.50



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07/23/25	VH	Finish drafting fourth written report to the court and send draft to R. Weiss for review.	0.80
07/24/25	VH	Draft letter to Mr. Cooper regarding mortgage for the Constitution Ave property and send draft letter to R. Weiss for review.	1.40
07/24/25	VH	Review and revise letter to Mr. Cooper regarding mortgage for the Constitution Ave property and send updated draft with exhibits to enclose to same to R. Weiss and K. Kent for review.	0.50
07/24/25	VH	Revise and finalize letter to Mr. Cooper regarding mortgage for the Constitution Ave property with all enclosures and coordinate mailing of same with mailroom.	0.20
07/24/25	VH	Confer with R. Weiss regarding revisions to letter to Mr. Cooper regarding Constitution Ave property.	0.10
07/24/25	JR	assemble documents regarding Empire Holdings Group LLC 401k Plan and forward to R. Weiss for review.	0.80
07/24/25	RW	Call with V. Huber regarding status report.	0.10
07/24/25	RW	Review and revise letter to mortgage company regarding Constitution Ave property.	0.40
07/24/25	VH	Confer with R. Weiss regarding status of and revisions to fourth status report to the court.	0.10
07/25/25	CC	Maintained and updated the Receivership website with relevant case documents, add new contents, and ensuring all updates were properly linked and accessible to the public.	0.20
07/25/25	RW	Review and revise Receiver's Fourth Status Report.	2.50
07/25/25	VH	Revise and finalize motion for approval of sale procedure for Constitution Ave property and send same to L. Doyle for filing.	0.40
07/25/25	VH	Email correspondence with R. Weiss regarding stipulation for sale procedure for Constitution Ave property.	0.10
07/25/25	VH	Email correspondence with C. Chew regarding adding recent court filings to the Receivership website.	0.10



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07/25/25	RW	Review and revise motion regarding sale of 6 Constitution Ave Property.	0.40
07/28/25	VH	Email correspondence with K. Kent and R. Weiss regarding Empire social media accounts and website domains and planned course of action in light of receivership wind down.	0.10
07/28/25	VH	Email correspondence with C. Chew regarding adding court order to Receivership website.	0.10
07/28/25	RW	Review K. Kent comments to fourth status report and further revise same.	0.20
07/28/25	RW	Review landscaping bill for 6 Constitution Ave Property.	0.10
07/28/25	RW	Call with V. Huber regarding status report and comments to same.	0.30
07/28/25	RW	Emails with K. Kent and V. Huber regarding plan for social media accounts and websites.	0.10
07/28/25	RW	Review V. Huber email to T. Gosau regarding purported shareholder loan for potential inclusion in status report.	0.10
07/28/25	CC	Maintained and updated the Receivership website with relevant case documents, add new contents, and ensuring all updates were properly linked and accessible to the public.	0.10
07/28/25	VH	Review and revise draft fourth status report to the court and send updated draft to K. Kent for review.	2.50
07/28/25	RW	Review signed stipulation and order regarding sale of 6 Constitution Ave Property.	0.10
07/28/25	VH	Review K. Kent edits and comments on draft fourth status report to the court and email R. Weiss regarding same.	0.20
07/28/25	VH	Confer with R. Weiss regarding revisions to draft fourth status report to the court.	0.30
07/29/25	VH	Email correspondence with K. Kent and R. Weiss regarding deactivating and deleting EEB social media accounts as part of receivership wind down.	0.30



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07/29/25	RW	Communicate with K. Kent and V. Huber regarding anticipated shut-down of social media accounts.	0.10
07/29/25	VH	Review and revise draft fourth status report to the court and send updated draft to R. Weiss for review.	0.80
07/29/25	RW	Review and revise updated fourth status report.	0.20
07/29/25	VH	Confer with R. Weiss regarding revisions to draft fourth status report to the court.	0.10
07/30/25	VH	Review EEB business records regarding customer email and information and confer with M. Mull regarding planned course of action for responding to repeat customer inquiry regarding consumer redress.	0.40
07/30/25	VH	Email correspondence with C. Chew regarding adding recent court filings to receivership website.	0.10
07/30/25	VH	Email correspondence with K. Kent, R. Weiss, and J. Russell regarding Receivership savings account.	0.10
07/30/25	JR	review and update status report.	1.20
07/30/25	RW	Communicate with K. Kent and J. Russell regarding opening of high-interest savings accounts and transfer of funds to same.	0.10
07/30/25	RW	Review and further revise fourth status report.	0.20
07/30/25	VH	Revise and finalize fourth status report to the court and send same to L. Doyle for filing.	0.60
07/31/25	VH	Review emails from R. Weiss regarding B. Barlow submission of 5500EZ tax form for Empire 401k plan and tax bill for Constitution Ave property.	0.10
07/31/25	RW	Review finalized documents for closure of 401K plan and email B. Barlow regarding same and next steps.	0.20
07/31/25	RW	Review confirmation of tax bill payment from Mr. Cooper and email team regarding same.	0.10
07/31/25	RW	Review email from M. Mull regarding social media accounts and respond to same regarding next steps toward deleting and deactivation.	0.10



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07/31/25	CC	Maintained and updated the Receivership website with relevant case documents, add new contents, and ensuring all updates were properly linked and accessible to the public.	0.50
08/01/25	JR	review account and pay Mortgage and HOA fee for 6 Constitution Ave property.	0.70
08/04/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding mortgage payment regarding 6 Constitution Ave property.	0.10
08/04/25	JR	Review HOA website regarding contact information and email to A. Winner regarding HOA contact regarding 6 Constitution Ave property.	0.20
08/04/25	JR	Review for water bill regarding Payment Due re Water for 6 Constitution Ave property, submit payment and update transaction ledger.	0.30
08/04/25	RW	Review asset turnover letter forwarded by P. Prusinowski and email P. Prusinowski regarding same.	0.10
08/04/25	RW	Communicate with J. Russell and K. Kent regarding landscaping charges.	0.10
08/05/25	JR	review website regarding Payment Due re Water for 6 Constitution Ave	0.20
08/06/25	JR	review website regarding bill regarding water bill for 6 Constitution ave property and cancel calendar event regarding payment.	0.20
08/07/25	JR	review account and pay HOA fee for 6 Constitution Ave property and update transaction ledger.	0.40
08/08/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding HOA and lawn maintenance payment regarding 6 Constitution Ave property.	0.20
08/08/25	RW	Call with K. Kent regarding plan for title serach.	0.10
08/08/25	VH	Email correspondence with M. Mull regarding draft letter to the parties regarding planned shut down of Empire social media accounts in furtherance of receivership wind down.	0.30
08/08/25	RW	Call with realtor regarding plan for 6 Constitution Ave property.	0.30



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08/08/25	RW	Review seller disclosure form and email P. Prusinowski regarding completion of same.	0.10
08/11/25	RW	Review and approve letter to P. Prusinowski regarding seller's property disclosure for 6 Constitution Ave Property.	0.10
08/12/25	MM	Draft letter to opposing counsel regarding deactivation of social media accounts.	2.10
08/12/25	VH	Review and revise draft letter to the parties notifying them of intended shut down of Empire social media accounts, work on revisions with M. Mull, and send updated draft to R. Weiss for review.	0.50
08/13/25	JR	Review HOA platform for 6 Constitution Ave property regarding Association information and documents and forward information to R. Weiss and P. Prusinowski.	0.90
08/13/25	JR	Download and forward Amex statement to P. Prusinowski and G. Christiansen.	0.30
08/13/25	JR	Review platform for HOA documents for 6 Constitution Ave property.	0.40
08/13/25	RW	Call with V. Huber regarding Constitution Ave disclosure and email P. Prusinowski regarding same.	0.10
08/13/25	VH	Confer with R. Weiss regarding P. Prusinowski completion of seller disclosure forms for sale of Constitution Ave property.	0.30
08/13/25	RW	Call with P. Prusinowski regarding seller's disclosure for 6 Constitution Avenue.	0.20
08/14/25	RW	Follow-up with P. Prusinowski regarding property disclosure document.	0.10
08/15/25	JR	phone call with R. Weiss regarding Mortgage balance regarding 6 Constitution Ave property and email to A. Winner regarding PECO setup for property.	0.40
08/15/25	RW	Prepare summary of findings from walk-through of 6 Constitution Avenue Property and prepare list of recommendations and next steps for K. Kent review.	0.70
08/15/25	RW	Email title company regarding running of title search on Constitution Ave property.	0.10



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08/15/25	RW	Prepare email to contractor regarding punch list items needed for repair of 6 Constitution Ave Property to prepare for sale.	0.60
08/15/25	RW	Travel to and visit 6 Constitution Avenue property for site visit with realtor to determine appropriate next steps to maximize sale value.	2.00
08/16/25	RW	Communicate with potential contractor regarding needed repairs for 6 Constitution Ave property.	0.20
08/16/25	RW	Visit carpet store to discuss and select most cost-effective option for rug replacement to prepare for sale of 6 Constitution Ave property.	0.30
08/17/25	RW	Prepare summary of efforts to fix up Constitution Avenue property and options for same.	0.30
08/17/25	RW	Review HOA documents for 6 Constitution Avenue property.	0.10
08/17/25	RW	Review listing contract for 6 Constitution Ave property and email realtor regarding same.	0.10
08/17/25	RW	Communicate with team regarding reinstatement of PECO services.	0.10
08/18/25	VH	Review email correspondence from R. Weiss regarding plans for Constitution Ave property maintenance and contracting in preparation for sale of property.	0.10
08/20/25	JR	review WSFS Account, and update ledger and emails to/from K. Greely regarding account issues.	0.50
08/20/25	VH	Review email from A. Grier regarding Empire business management database information for redress efforts and email R. Weiss regarding same.	0.10
08/20/25	JR	setup account and make payment re Landscaping for 6 Constitution Ave property.	0.80
08/21/25	JR	review WSFS account regarding positive pay and email to K. Kent and R. Weiss regarding approval of payment.	0.10
08/21/25	JR	review WSFS account regarding checking and savings account and transfer funds to savings.	0.10



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08/21/25	RW	Travel to Constitution Avenue property and meet with contractor to discuss necessary repairs - (1.5 NO CHARGE.)	1.50
08/22/25	JR	review PECO form, phone call with R. Weiss and email to A. Winner regarding PECO form for 6 Constitution Ave property.	0.50
08/25/25	VH	Review email correspondence with P. Prusinowski regarding Empire CRM databases for information for FTC to retrieve for consumer redress purposes.	0.10
08/25/25	JR	review records and forward login information to C. Chew.	0.20
08/25/25	VH	Email correspondence with R. Weiss regarding forthcoming Receiver status reports due to the court.	0.20
08/27/25	VH	Email correspondence with R. Weiss and J. Russell regarding transmission of PipeDrive preserved documents and data to the FTC for consumer redress purposes and send preserved documents and data to A. Grier and R. McAuliffe.	0.20
08/27/25	JR	assemble materials and generate link regarding PipeDrive Data and forward to V. Huber.	0.20
08/27/25	RW	Review invoice for work to be done to 6 Constitution Ave property and email comments and needed adjustments regarding same.	0.20
08/28/25	VH	Review email inquiry from former Empire customer and email J. Russell regarding handling response to same.	0.20
08/28/25	JR	emails to/from V. Huber regarding inquiry from customer.	0.20
09/02/25	VH	Email correspondence with A. Grier and R. Weiss regarding status update meeting to discuss status of receivership wind down and consumer redress.	0.10
09/02/25	RW	Review updated contractor invoice for property repair and email K. Kent and J. Russell regarding same and next steps.	0.10
09/02/25	RW	Prepare email to W. Myers with instructions and guidance regarding scheduling and overseeing work to be performed at 6 Constitution Ave Property.	0.20
09/03/25	JR	Review mortgage and HOA accounts for payment.	0.60



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09/03/25	RW	Communicate with J. Russell and K. Kent regarding mortgage escrow increase.	0.10
09/04/25	JR	Review and update transaction ledger.	0.30
09/04/25	JR	Review account and pay Mortgage and HOA fee for 6 Constitution Ave property and update transaction ledger.	0.60
09/05/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding HOA payment regarding 6 Constitution Ave property.	0.20
09/08/25	VH	Review and compile documents and data containing information on Empire customers and send secure link of same to A. Grier and R. McAuliffe for consumer redress efforts.	0.20
09/08/25	VH	Attend Teams call with R. Weiss, A. Grier, and R. McAuliffe regarding status updates of receivership wind down and consumer redress.	0.60
09/08/25	VH	Email correspondence with T. Gosau, J. Palacios, and R. Weiss regarding Empire Realty 2024 activity for 2024 tax returns.	0.10
09/08/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding mortgage payment regarding 6 Constitution Ave property.	0.20
09/08/25	JR	Review sewer invoice and submit payment regarding 6 constitution avenue.	0.30
09/08/25	RW	Meet with A. Grier, R. McAuliffe and V. Huber regarding status of wind-down activities and customer relations management database.	0.60
09/08/25	RW	Communicate with Alvarez and Marsal tax team and V. Huber regarding Empire Realty financial activity.	0.10
09/09/25	JR	emails to/from V. Huber regarding TD Bank account.	0.20
09/09/25	VH	Email correspondence with K. Kent, R. Weiss, and J. Russell regarding TD Bank account notice of closure of Empire Partner account and proposed course of action in light of same.	0.20
09/09/25	VH	Confer with J. Russell regarding course of action to transfer TD bank account balances to receivership account and subsequent closure of TD bank accounts.	0.10



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09/09/25	RW	Communicate with team regarding transfer of balances in TD Bank accounts.	0.10
09/09/25	RW	Review TD Bank account information and send email to TD Bank requesting transfer of funds from same.	0.20
09/10/25	JR	review WSFS account regarding positive pay and approve payment regarding check issued Dconstruct Design regarding 6 Constitution Ave property.	0.20
09/10/25	VH	Review preliminary injunction and permanent injunction and email K. Kent, R. Weiss, and J. Russell regarding continued service of monthly receivership account statements.	0.20
09/10/25	VH	Review email correspondence from R. Weiss, K. Kent, and TD Bank regarding Empire Partner account closure and requesting similar closure for Empire Realty and transfer of balance of funds from both accounts to the receivership account.	0.20
09/11/25	VH	Review email correspondence from T. Gosau and R. Weiss regarding rental expenses for 2024 for Constitution Ave property and from TD Bank regarding request to transfer balances of Empire Realty and Empire Partner accounts to the receivership account.	0.10
09/11/25	RW	Follow up with TD Bank regarding status of balance of Receivership Accounts.	0.10
09/12/25	JR	download and forward Final Stipulated Order to K. Kent for review.	0.10
09/12/25	RW	Emails regarding final invoice and final walk through of 6 Constitution Ave property.	0.20
09/15/25	VH	Email correspondence with R. Weiss regarding EINs for Empire Holdings and Atlas Fund LP for 2024 tax filings.	0.10
09/15/25	RW	Review carpet invoice and communicate with team regarding same.	0.10
09/15/25	RW	Review tax returns for Empire Holdings and Atlas Fund and email tax team and internal team regarding same.	0.20
09/15/25	RW	Call with T. Gosau regarding Empire taxes.	0.10
09/15/25	RW	Call with T. Gosau regarding completion and submission of tax return.	0.10



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09/15/25	RW	Walk-through of 6 Constitution Ave Property to review completed contracting work.	0.30
09/16/25	JR	review WSFS account and update transaction ledger.	0.20
09/16/25	JR	phone call with Olden Carpet regarding payment and emails to/from R. Weiss regarding payment and next steps.	0.50
09/17/25	JR	update transaction ledger regarding carpet and flooring payment.	0.40
09/18/25	VH	Confer with K. Kent and R. Weiss regarding status of TD Bank's transfer of Empire account funds to the receivership account and status update on maintenance on Constitution Ave property in preparation for sale of the property.	0.10
09/18/25	JR	emails to/from R. Weiss and K. Walsh and phone call with M. DiSantis regarding Invoice and payment for repairs to 6 Constitution Ave property.	0.70
09/18/25	JR	review WSFS account and approve Positive pay regarding DConstruct payment.	0.20
09/18/25	RW	Communicate with K. Kent and V. Huber regarding anticipated sale of 6 Constitution Ave Property.	0.10
09/19/25	JR	phone call with R. Weiss regarding Mortgage for 6 Constitution Ave property.	0.30
09/19/25	RW	Review and finalize property disclosures for 6 Constitution Ave Property.	0.30
09/19/25	RW	Review and finalize listing contract and supporting documents for 6 Constitution Ave property.	0.50
09/19/25	RW	Call with J. Russell regarding mortgage details for listing contract.	0.20
09/19/25	RW	Call with realtor to discuss listing agreement and seller's disclosures.	0.20
09/19/25	RW	Travel to and meet with realtor to go over and finalize paperwork for sale of 6 Constitution Ave property.	1.00
09/23/25	JR	Phone call with Olden Carpet Flooring for W9.	0.20



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09/24/25	JR	Emails to/from R. Weiss regarding insurance policy billing statement.	0.40
09/24/25	RW	Review and respond to email from counsel for TD Bank regarding closed accounts and transfer of funds.	0.10
09/25/25	RW	Communicate with counsel for TD Bank regarding transfer of balance.	0.10
09/25/25	RW	Communicate with P. Prusinowski regarding insurance bill for 6 Constitution Ave property.	0.10
09/25/25	RW	Review email from P. Prusinowski regarding personal tax returns and email tax team regarding same.	0.10
09/26/25	VH	Review email correspondence from PayPal counsel regarding transfer of funds from Empire Partner PayPal account to receivership account and update receivership wind down action items list in light of same.	0.10
09/26/25	JR	Review WSFS account regarding positive pay notification and review transaction ledger and approve payment to Olden Carpet and email to K. Kent and R. Weiss regarding payment.	0.30
09/26/25	RW	Communicate with counsel for PayPal regarding transfer of balance.	0.10
09/26/25	RW	Communications with P. Prusinowski and T. Gosau regarding tax issues.	0.30
09/29/25	VH	Confer with R. Weiss regarding Constitution Ave property active sale listing and sale efforts related to same, and plan for shutdown of Empire social media.	0.20
09/29/25	VH	Email correspondence with R. Weiss regarding letter to counsel regarding planned shutdown of Empire social media.	0.10
09/29/25	RW	Call with V. Huber regarding property and tax issues.	0.20
09/29/25	RW	Call with P. Prusinowski regarding tax issues.	0.20
10/01/25	RW	Email with counsel for mortgage company regarding 6 Constitution Ave property.	0.10
10/01/25	RW	Meet with T. Gosau and J. Palacios to discuss tax issues.	0.50
10/01/25	RW	Email with J. Palacios and R. Poteet regarding breakdown of attorney's fees for tax purposes.	0.10



Kevin Dooley Kent, Receiver
 Matter Name: Empire Holdings Group LLC, et
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10/02/25	JR	Review account and pay Mortgage and HOA fee for 6 Constitution Ave property, update account password and update transaction ledger.	0.70
10/03/25	JR	Review WSFS account, approve positive pay and ACH positive pay, and email to K. Kent and R. Weiss regarding approval of Positive Pay and ACH positive pay regarding HOA payment regarding 6 Constitution Ave property.	0.20
10/03/25	RW	Review second offer for 6 Constitution Ave property.	0.10
10/03/25	RW	Call with S. Gibbs (counsel for mortgage company) regarding 6 Constitution Ave property and plans for same.	0.20
10/03/25	RW	Calls with realtor and K. Kent regarding offers for 6 Constitution Ave property and plan for responding to same.	0.50
10/04/25	RW	Email counsel for mortgage company regarding deal to sell 6 Constitution Ave Property.	0.10
10/05/25	RW	Review and revise letter regarding planned shut-down of social media accounts.	0.10
10/05/25	RW	Follow-up with counsel for TD Bank regarding status of balance transfers of TD Bank accounts to receivership.	0.10
10/06/25	VH	Revise and finalize letter regarding planned shutdown of Empire social media accounts and send same to defense counsel and the FTC.	0.20
10/06/25	VH	Email correspondence with M. Mull regarding plan for shut down of Empire social media accounts.	0.10
10/06/25	JR	Review WSFS account, approve ACH positive pay, and email to K. Kent and R. Weiss regarding approval of ACH positive pay regarding mortgage payment regarding 6 Constitution Ave property.	0.20
10/07/25	JR	review NWWA invoice, setup account for payments and submit invoice payment and email to K. Kent, V. Huber, and R. Weiss regarding NWWA account and payment.	0.70
10/07/25	VH	Email correspondence with J. Russell regarding resolution of Constitution Ave water bill.	0.10



Kevin Dooley Kent, Receiver
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10/07/25	JR	review NWWA invoice, and submit invoice payment and email to K. Kent, V. Huber, and R. Weiss regarding NWWA account and payment.	0.30
10/07/25	JR	review check and assemble deposit materials regarding TD Bank check for Empire.	0.50
10/10/25	VH	Review and compile Empire Realty formation documents, operating agreement showing Atlas Fund ownership, and Permanent Injunction order and send same with draft response email to realtor of Constitution Ave property to R. Weiss and K. Kent for review.	0.50
10/13/25	MM	Collaborate with team to shut-down Empire's social media pursuant to Receiver's orders.	1.10
10/13/25	VH	Confer with M. Mull regarding login issues related to attempted shut down of Empire social media accounts.	0.30
10/13/25	JR	emails to/from R. Weiss, and K. Kent regarding insurance payment, phone call with SafeCo regarding address for payment and draft cover letter for	1.30
10/13/25	JR	phone call with M. Mull regarding empire emails and review google account regarding login.	0.80
10/14/25	JR	review Godaddy account, and emails to/from M. Mull regarding account access.	0.40
10/14/25	MM	Review Empire's social media and collaborate with team in shutting it down.	1.40
10/14/25	VH	Review and revise draft email to P. Prusinowski regarding assistance with shutdown of Empire Instagram account and send revised email to M. Mull.	0.20
10/14/25	VH	Email correspondence with J. Russell and M. Mull regarding login issues related to attempted shut down of Empire social media accounts.	0.10
10/14/25	JR	Assemble packet regarding payment to SafeCo insurance for 6 Constitution Ave property and email to office services regarding mailing of payment.	0.40
10/14/25	JR	review GSuite regarding email domain and email to M. Mull regarding email domain.	0.20



Kevin Dooley Kent, Receiver
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10/16/25	JR	review GoDaddy and reactivate domains and email to M. Mull regarding reactivated domains.	0.50
10/16/25	RW	Follow-up with R. Poteet regarding representation for P. Prusinowski and Empire and fee breakdown for same.	0.10
10/16/25	RW	Communicate with team and TD bank regarding status of checks from account closures.	0.10
10/16/25	RW	Follow-up with counsel for PayPal regarding status of transfer of account balance.	0.10
10/17/25	RW	Call with V. Huber regarding status report.	0.10
10/17/25	RW	Communicate with TD Bank regarding account closure check.	0.10
10/17/25	VH	Confer with R. Weiss regarding preparation of forthcoming status report due to the court.	0.10
10/19/25	RW	Review settlement checklists and documents and email realtor, K. Kent and J. Russell regarding same.	0.20
10/20/25	VH	Email correspondence with M. Mull regarding repeated inquiries from former Empire customer.	0.10
10/21/25	JR	review WSFS account and approve Positive pay.	0.20
10/21/25	RW	Review check from TD Bank for closure of Empire Partner account and email team regarding same.	0.10
10/22/25	VH	Email correspondence with M. Mull regarding status of and issues associated with Empire social media account shut down.	0.10
10/22/25	JR	assemble materials for check deposit and email to office services for deposit.	0.40
10/22/25	VH	Draft fifth status report to the court.	2.70
10/23/25	VH	Email correspondence with R. Weiss and J. Short regarding Empire Realty EIN number.	0.10
10/23/25	JR	review records regarding EIN number re Empire Realty Holdings LLC	0.20



Kevin Dooley Kent, Receiver
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10/23/25	JR	begin assembling documents regarding property sale.	0.70
10/23/25	VH	Continue drafting fifth status report to the court.	3.00
10/24/25	JR	review and forward mortgage information to R. Weiss and J. Short.	0.10
10/24/25	VH	Email correspondence with J. Russell regarding receivership account transaction ledger.	0.10
10/24/25	VH	Email correspondence with M. Mull regarding status of and updates on Empire social media account shut down.	0.30
10/24/25	VH	Email correspondence with J. Russell regarding clickfunnels subscription and access to EEB website.	0.10
10/24/25	MM	Correspondence with J. Russell and V. Huber regarding activation of Empire email for purposes of shutting down Empire social media accounts.	0.20
10/24/25	JR	email to K. Kent and R. Weiss regarding 6 Constitution Ave property keys.	0.20
10/24/25	JR	review WSFS account regarding balances and forward findings to V. Huber.	0.20
10/24/25	JR	emails to/from V. Huber regarding Click Funnels Invoice Payment.	0.20
10/24/25	JR	review GSuites and ecommerce email regarding access and emails to/from K. Kent, M. Mull, R. Weiss, and V. Huber regarding access.	1.00
10/24/25	JR	review WSFS account and update transaction ledger and forward to V. Huber.	0.50
10/24/25	VH	Continue drafting fifth status report to the court and send draft to R. Weiss for review.	2.30
10/27/25	MM	Draft status update regarding what social media accounts have been deactivated and details as to the issues on why certain accounts have yet to be deactivated.	0.60
10/27/25	VH	Draft notice letter to non-consumer creditors regarding final report and deadline for filing objections to same and send draft letter to R. Weiss for review.	0.40



Kevin Dooley Kent, Receiver
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10/27/25	VH	Review and revise draft email to TikTok support regarding request to delete Empire TikTok account and send updated draft email to M. Mull.	0.60
10/27/25	VH	Troubleshoot Empire TikTok account login issues.	0.50
10/27/25	VH	Email correspondence with M. Mull regarding status of Empire social media shut down.	0.40
10/27/25	VH	Email correspondence with J. Russell and R. Weiss regarding Empire Partner PayPal account, account balance, and updates from PayPal's counsel regarding sending account balance to Receivership Account.	0.10
10/27/25	MM	Coordinate with P. Prusinowski to receive authentication code to log into YouTube (@ecommerce.empire.builders) and deactivate account.	0.20
10/27/25	VH	Review emails from A&M regarding tax filings and related information for the receivership entities and confer with R. Weiss regarding same.	0.20
10/27/25	RW	Review and revise final status report.	1.90
10/27/25	JR	phone call with M. Mull regarding Empire Youtube account and twitter account.	0.20
10/27/25	JR	review Empire Twitter account regarding access issue.	0.40
10/27/25	JR	review records regarding payments and emails to/from R. Weiss regarding payments.	0.30
10/27/25	JR	review PayPal account and forward findings to V. Huber.	0.10
10/27/25	MM	Conference with J. Russell regarding deactivation of social media accounts.	0.20
10/27/25	RW	Call with V. Huber regarding comments to status report.	0.30
10/27/25	RW	Call with V. Huber regarding final status report.	0.20
10/27/25	MM	Correspondence with TikTok regarding deletion of Ecommerce Empire Builder's account.	0.20
10/27/25	VH	Review and revise draft final status report and send updated draft to K. Kent and R. Weiss for review.	2.50



Kevin Dooley Kent, Receiver
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10/27/25	VH	Confer with R. Weiss regarding final status report and notice letter to non-consumer creditors regarding final report and deadline for filing objections to same.	0.50
10/28/25	VH	Revise and finalize notice letters to non-consumer creditors regarding final receivership status report and deadline for submitting objections thereto and send same with final report to counsel for American Express, P. Morana, and J. Nadar.	0.60
10/28/25	RW	Review and revise letter to creditors regarding final status report.	0.10
10/28/25	JR	phone call with R. Weiss regarding property water bills for 6 Constitution Ave property.	0.20
10/28/25	JR	review and update draft of status report and forward to V. Huber.	0.40
10/28/25	RW	Review settlement sheet for 6 Constitution Ave and email realtor with questions regarding same.	0.20
10/28/25	RW	Communicate with counsel for PayPal and mailroom regarding account balance check.	0.10
10/28/25	RW	Address matters relating to mortgage payoff and other sale documents in preparation for sale of 6 Constitution Ave Property.	0.40
10/28/25	RW	Review and further revise fifth and final status report.	0.30
10/28/25	VH	Revise and finalize fifth status report to the court and send same to L. Doyle for filing.	0.30
10/28/25	VH	Review and revise fifth status report to the court and send updated draft to R. Weiss for review.	1.00
10/28/25	VH	Confer with K. Kent and R. Weiss regarding revisions to fifth status report to the court.	0.50
10/29/25	VH	Review PA Department of Revenue letter to Empire regarding notice of employer withholding tax payment frequency change and email R. Weiss and K. Kent regarding same.	0.10
10/29/25	RW	Review notice from IRS regarding withholding payment timing and forward same to tax team.	0.10



Kevin Dooley Kent, Receiver
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10/30/25	RW	Review emails from K. Kent and J. Short regarding attendance at closing for sale of 6 Constitution Ave. Property.	0.10
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Total 314.10

TASK SUMMARY

	Hours	Amount
L110 - Fact Investigation/Development	86.1	35,334.00
A101 - Plan and prepare for	9.2	2,559.00
A103 - Draft/revise	27.0	11,442.15
A104 - Review/analyze	18.1	7,914.60
A105 - Communicate (in firm)	20.1	8,521.80
A107 - Communicate (outside counsel)	5.3	2,052.45
A108 - Communicate (other external)	6.4	2,844.00
L120 - Analysis/Strategy	140.4	53,994.90
A101 - Plan and prepare for	0.2	60.00
A102 - Research	0.8	216.00
A103 - Draft/revise	10.9	5,679.00
A104 - Review/analyze	81.3	23,300.25
A105 - Communicate (in firm)	22.7	11,910.90
A107 - Communicate (outside counsel)	3.8	2,081.25
A108 - Communicate (other external)	14.0	7,822.50
A109 - Appear for/attend	6.7	2,925.00
L140 - Document/File Management	12.1	459.00
A110 - Manage data/files	11.2	216.00
A111 - Other	0.9	243.00
L210 - Pleadings	1.1	618.75
A103 - Draft/revise	0.8	450.00
A104 - Review/analyze	0.3	168.75
L220 - Prelim Injunctions/Prov Remedies	0.2	112.50
A104 - Review/analyze	0.2	112.50
L230 - Court Mandated Conferences	1.3	643.05
A105 - Communicate (in firm)	0.5	230.85
A108 - Communicate (other external)	0.2	112.50



Kevin Dooley Kent, Receiver
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A109 - Appear for/attend	0.6	299.70
L250 - Other Written Motions/Submission	71.7	30,803.40
A103 - Draft/revise	63.2	27,671.40
A104 - Review/analyze	3.1	855.45
A105 - Communicate (in firm)	5.1	2,120.40
A107 - Communicate (outside counsel)	0.2	99.90
A108 - Communicate (other external)	0.1	56.25
L430 - Written Motions/Submissions	1.2	618.75
A103 - Draft/revise	0.9	506.25
A104 - Review/analyze	0.1	0.00
A107 - Communicate (outside counsel)	0.2	112.50
	314.1	\$122,584.35

EXPENSE SUMMARY

Description	Amount
EDiscovery Hosting Services - per GB	114.15
Mileage	160.58
Business Meals	11.44
Federal Express	118.36
American Express - 010077377037-Charge for carpet and flooring services in receivership case.	997.50
Ching Chew - 010076678849- https://www.empireholdingsgroupreceivership.com/ website hosting and website domain renewal.	177.51
Locksmith to change to lock for a client home that is under receivership. - Misc - Other	215.00
Total	\$ 1,794.54

EXPENSE DETAIL

Date	Description	Amount
03/05/25	Federal Express Tracking # 286107775175 Ship Dt: 03/05/25 Ship To:	26.46
03/05/25	Federal Express Tracking # 286107483142 Ship Dt: 03/05/25 Ship To: Paya Services Inc.	22.15
03/27/25	Locksmith to change to lock for a client home that is under receivership. - Misc - Other	215.00
03/28/25	EDiscovery Hosting Services - per GB EDiscovery Hosting Services - per GB	114.15



Kevin Dooley Kent, Receiver
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04/08/25	Fed Ex Freight East - Tracking # 287355132695; Ship Dt: 04/08/25; Ship To: ; Invoice No: 882981164	21.96
04/16/25	Robin Weiss - Mileage 010073652974-mileage to site.	37.38
05/22/25	Kevin Kent - Business Meals 010074418606 - Lunch re travel to Jamison to retrieve keys and Rolex from defendant, meet with appraiser re safe deposit box contents.	11.44
07/24/25	Fed Ex Freight East - Tracking # 391392838740; Ship Dt: 07/24/25; Ship To: Nationstar Mortgage LLC d/b/a; Invoice No: 894398586	28.68
08/11/25	Fed Ex Freight East - Tracking # 391994936441; Ship Dt: 08/11/25; Ship To: Peter Prusinkowski; Invoice No: 895860819	19.11
09/10/25	Ching Chew - 010076678849- https://www.empireholdingsgroupreceivership.com/ website hosting and website domain renewal.	177.51
09/23/25	Willie Myers - Mileage 010076925364-Travel to/from Doylestown for Empire matter overseeing contractor	30.80
09/23/25	Willie Myers - Mileage 010076925364-Travel to/from Doylestown for Empire matter overseeing contractor	30.80
09/23/25	Willie Myers - Mileage 010076925364-Travel to/from Doylestown for Empire matter overseeing contractor	30.80
09/23/25	Willie Myers - Mileage 010076925364-Travel to/from Doylestown for Empire matter overseeing contractor and carpet.	30.80
10/14/25	American Express - 010077377037-Charge for carpet and flooring services in receivership case.	997.50

Total**\$ 1,794.54**

EXHIBIT E



Alvarez & Marsal
Disputes and Investigations, LLC

April 7, 2025

Kevin Dooley Kent, Receiver
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2640
Philadelphia, PA 19103

INVOICE FOR SERVICES RENDERED
through March 31, 2025 not previously invoiced

Empire Holdings: 859382-250402347

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Tax Team:				
Sean Menendez	Managing Director	0.80	\$850	\$680.00
Jennifer Palacios	Senior Director	2.10	\$635	\$1,333.50
Adalys Alvarez	Senior Associate	0.50	\$450	\$225.00
Daneil Ayala	Associate	0.80	\$350	\$280.00
Total Hours & Fees:		4.20		\$2,518.50
Total this Invoice:				\$2,518.50
Payment Amount Due:				\$ 2,518.50

Wire Instructions:

[Redacted Wire Instructions]

Mail Instructions:

[Redacted Mail Instructions]

April 7, 2025

859382-250402347

Kevin Dooley Kent, Receiver
 Clark Hill PLC
 Two Commerce Square
 2001 Market Street, Suite 2640
 Philadelphia, PA 19103

Re: Federal Trade Commission v. Empire Holdings Group, LLC, also d/b/a Ecommerce Empire Builders and Storefunnels.net, et al (the "Action")

SERVICES RENDERED

By Alvarez & Marsal Disputes and Investigations, LLC
 through March 31, 2025 not previously invoiced

Name	Date	Description	Hours
Menendez, Sean	3/10/2025	Extensions, etc.	0.30
Menendez, Sean	3/14/2025	Extensions, grantor trust matters.	0.50
Menendez, Sean Total			0.80
Palacios, Jennifer	3/12/2025	Review prior year tax returns and trust documents. Prepare extensions. Correspondence with team.	0.40
Palacios, Jennifer	3/13/2025	Review prior year tax returns and trust documents. Prepare extensions. Correspondence with team.	0.90
Palacios, Jennifer	3/14/2025	Review prior year tax returns and trust documents. Prepare extensions. Correspondence with team.	0.80
Palacios, Jennifer Total			2.10
Ayala, Daniel	3/11/2025	Empire Holdings Group LLC and Atlas Fund LP Extensions and creating locators and filling out information on OIT.	0.80
Ayala, Daniel Total			0.80
Alvarez, Adalys	3/12/2025	3/15 extensions.	0.30
Alvarez, Adalys	3/13/2025	3/15 extensions.	0.20
Alvarez, Adalys Total			0.50
Grand Total			4.20



Alvarez & Marsal
Disputes and Investigations, LLC

May 30, 2025

Kevin Dooley Kent, Receiver
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2640
Philadelphia, PA 19103

INVOICE FOR SERVICES RENDERED
through April 30, 2025 not previously invoiced

Empire Holdings: 859382-250530148

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Forensic Analysis Team:				
Michael Shanahan	Managing Director	2.30	\$750	\$1,725.00
Tracy Gosau	Director	7.00	\$575	\$4,025.00
Ameeta Mehta	Senior Associate	7.70	\$450	\$3,465.00
Tax Team:				
Sean Menendez	Managing Director	0.20	\$850	\$170.00
Emilio Martinez	Managing Director	0.50	\$850	\$425.00
Jennifer Palacios	Senior Director	0.70	\$635	\$444.50
Total Hours & Fees:		18.40		\$10,254.50
Out-of-pocket Expenses:				\$0.30
Total this Invoice:				\$10,254.80
Payment Amount Due:				\$ 10,254.80

Wire Instructions:

[REDACTED]

Mail Instructions:

[REDACTED]

May 30, 2025

859382-250530148

Kevin Dooley Kent, Receiver
 Clark Hill PLC
 Two Commerce Square
 2001 Market Street, Suite 2640
 Philadelphia, PA 19103

Re: Federal Trade Commission v. Empire Holdings Group, LLC, also d/b/a Ecommerce Empire Builders and Storefunnels.net, et al (the "Action")

SERVICES RENDERED

By Alvarez & Marsal Disputes and Investigations, LLC
 through April 30, 2025 not previously invoiced

Name	Date	Description	Hours
Shanahan, Michael	4/3/2025	Call with M. Shanahan and T. Gosau (A&M) to discuss 12/31/2024 Financials for Receivership entities.	1.60
Shanahan, Michael	4/3/2025	Review financial statements for tax reporting purposes.	0.60
Shanahan, Michael	4/4/2025	Call with M. Shanahan and T. Gosau (A&M) to discuss accounting and tax requirements.	0.10
Shanahan, Michael Total			2.30
Gosau, Tracy	4/2/2025	Working session with tax team on tax reporting requirements for Receivership entities.	0.50
Gosau, Tracy	4/3/2025	Call with M. Shanahan and T. Gosau (A&M) to discuss 12/31/2024 Financials for Receivership entities.	1.60
Gosau, Tracy	4/3/2025	Update 2024 balance sheet and P&L for Receivership entities.	3.50
Gosau, Tracy	4/4/2025	Call with M. Shanahan and T. Gosau (A&M) to discuss accounting and tax requirements.	0.10
Gosau, Tracy	4/4/2025	Update 2024 balance sheet and P&L for Receivership entities.	0.90
Gosau, Tracy	4/29/2025	Call with T. Gosau and A. Mehta (A&M) to discuss preparing quarterly accounting records and books.	0.40
Gosau, Tracy Total			7.00
Mehta, Ameer	4/29/2025	Call with T. Gosau and A. Mehta (A&M) to discuss preparing quarterly accounting records and books.	0.40
Mehta, Ameer	4/29/2025	Extract Empire Holdings American Express transaction detail for Q1 2025.	0.80
Mehta, Ameer	4/29/2025	Extract Empire Holdings PayPal transaction detail for Q1 2025.	0.30
Mehta, Ameer	4/29/2025	Review methodology of preparation of accounting books and records.	0.90
Mehta, Ameer	4/29/2025	Revise Empire Holdings Balance Sheet for the period ended March 2025.	0.70
Mehta, Ameer	4/29/2025	Revise Empire Holdings Profit and Loss Statement for the period ended March 2025.	0.60
Mehta, Ameer	4/30/2025	Review Empire Holdings American Express transaction detail for Q1 2025.	1.10
Mehta, Ameer	4/30/2025	Review Empire Holdings WSFS activity for Q1 2025.	0.70
Mehta, Ameer	4/30/2025	Review Empire Partner TD Bank activity for Q1 2025.	0.40
Mehta, Ameer	4/30/2025	Revise Empire Holdings Balance Sheet for the period ended March 2025.	0.40
Mehta, Ameer	4/30/2025	Revise Empire Holdings Profit and Loss Statement for the period ended March 2025.	0.80
Mehta, Ameer	4/30/2025	Revise Empire Partner Profit and Loss Statement for the period ended March 2025.	0.60
Mehta, Ameer Total			7.70

Name	Date	Description	Hours
Menendez, Sean	4/4/2025	Extension matters.	0.20
Menendez, Sean Total			0.20
Martinez, Emilio	4/5/2025	PA notice.	0.50
Martinez, Emilio Total			0.50
Palacios, Jennifer	4/11/2025	Review Trust Agreements to confirm if any trust filing requirements.	0.40
Palacios, Jennifer	4/15/2025	Prepare and send email regarding Trust filing requirements.	0.30
Palacios, Jennifer Total			0.70
Grand Total			18.40

Expenses

Date	Employee	Category	Amount
4/30/2025	PACER	PACER Research Fees	0.30
Total Expenses			\$0.30



Alvarez & Marsal
Disputes and Investigations, LLC

June 11, 2025

Kevin Dooley Kent, Receiver
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2640
Philadelphia, PA 19103

INVOICE FOR SERVICES RENDERED
through May 31, 2025 not previously invoiced

Empire Holdings: 859382-250610280

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Forensic Analysis Team:				
Tracy Gosau	Director	2.20	\$575	\$1,265.00
Ameeta Mehta	Senior Associate	2.30	\$450	\$1,035.00
Total Hours & Fees:		4.50		\$2,300.00
Total this Invoice:				\$2,300.00
Payment Amount Due:				\$ 2,300.00

Wire Instructions:

[Redacted Wire Instructions]

Mail Instructions:

[Redacted Mail Instructions]

June 11, 2025

859382-250610280

Kevin Dooley Kent, Receiver
 Clark Hill PLC
 Two Commerce Square
 2001 Market Street, Suite 2640
 Philadelphia, PA 19103

Re: Federal Trade Commission v. Empire Holdings Group, LLC, also d/b/a Ecommerce Empire Builders and Storefunnels.net, et al (the "Action")

SERVICES RENDERED

By Alvarez & Marsal Disputes and Investigations, LLC
 through May 31, 2025 not previously invoiced

Name	Date	Description	Hours
Gosau, Tracy	5/21/2025	Update Q1 25 Accounting	2.20
Gosau, Tracy Total			2.20
Mehta, Ameer	5/6/2025	Revise Empire Holdings Profit and Loss Statement for the period ended March 2025.	0.40
Mehta, Ameer	5/6/2025	Revise Empire Partner Profit and Loss Statement for the period ended March 2025.	0.40
Mehta, Ameer	5/6/2025	Revise Empire Holdings Balance Sheet for the period ended March 2025.	0.60
Mehta, Ameer	5/7/2025	Revise Empire Holdings Balance Sheet for the period ended March 2025.	0.20
Mehta, Ameer	5/7/2025	Revise Empire Holdings Profit and Loss Statement for the period ended March 2025.	0.30
Mehta, Ameer	5/7/2025	Revise Empire Partner Profit and Loss Statement for the period ended March 2025.	0.40
Mehta, Ameer Total			2.30
Grand Total			4.50



Alvarez & Marsal
Disputes and Investigations, LLC

August 21, 2025

Kevin Dooley Kent, Receiver
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2640
Philadelphia, PA 19103

INVOICE FOR SERVICES RENDERED
through July 31, 2025 not previously invoiced

Empire Holdings: 859382-250820422

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Forensic Analysis Team:				
Tracy Gosau	Director	0.70	\$575	\$402.50
Tax Team:				
Sean Menendez	Managing Director	2.70	\$850	\$2,295.00
Jennifer Palacios	Senior Director	8.20	\$635	\$5,207.00
Total Hours & Fees:		11.60		\$7,904.50
Total this Invoice:				\$7,904.50
Payment Amount Due:				\$ 7,904.50

Wire Instructions:

[Redacted Wire Instructions]

Mail Instructions:

[Redacted Mail Instructions]

August 21, 2025

859382-250820422

Kevin Dooley Kent, Receiver
 Clark Hill PLC
 Two Commerce Square
 2001 Market Street, Suite 2640
 Philadelphia, PA 19103

Re: Federal Trade Commission v. Empire Holdings Group, LLC, also d/b/a Ecommerce Empire Builders and Storefunnels.net, et al (the "Action")

SERVICES RENDERED

By Alvarez & Marsal Disputes and Investigations, LLC
 through July 31, 2025 not previously invoiced

Name	Date	Description	Hours
Gosau, Tracy	7/9/2025	Call with A&M (S. Menendez, T. Gosau) and counsel to discuss 2024 taxes.	0.70
Gosau, Tracy Total			0.70
Menendez, Sean	7/1/2025	Communications regarding [REDACTED]	0.20
Menendez, Sean	7/3/2025	Communications regarding [REDACTED]	0.70
Menendez, Sean	7/9/2025	Call with A&M (S. Menendez, T. Gosau) and counsel to discuss 2024 taxes.	0.70
Menendez, Sean	7/9/2025	Communications regarding Receiver [REDACTED]	0.30
Menendez, Sean	7/10/2025	Communications regarding Receiver [REDACTED]	0.20
Menendez, Sean	7/11/2025	Communications regarding Receiver [REDACTED]	0.10
Menendez, Sean	7/18/2025	Communications re tax positions.	0.50
Menendez, Sean Total			2.70
Palacios, Jennifer	7/1/2025	Review email regarding property owned by Empire Realty Holdings and related correspondence.	0.60
Palacios, Jennifer	7/2/2025	Review email regarding property owned by Empire Realty Holdings and related correspondence.	0.40
Palacios, Jennifer	7/3/2025	Review email regarding property owned by Empire Realty Holdings and related correspondence.	0.80
Palacios, Jennifer	7/10/2025	Review Empire Realty structure and [REDACTED]	1.20
Palacios, Jennifer	7/11/2025	Review Empire Realty structure and [REDACTED]	0.90
Palacios, Jennifer	7/18/2025	Prepare email with [REDACTED]	4.30
Palacios, Jennifer Total			8.20
Grand Total			11.60



Alvarez & Marsal
Disputes and Investigations, LLC

September 19, 2025

Kevin Dooley Kent, Receiver
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2640
Philadelphia, PA 19103

INVOICE FOR SERVICES RENDERED
through August 31, 2025 not previously invoiced

Empire Holdings: 859382-250919365

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Tax Team:				
Sean Menendez	Managing Director	1.00	\$850	\$850.00
Drew Herring	Senior Associate	12.75	\$450	\$5,737.50
Christopher Exarhos	Associate	5.40	\$350	\$1,890.00
Total Hours & Fees:		19.15		\$8,477.50
Total this Invoice:				\$8,477.50
Payment Amount Due:				\$ 8,477.50

Wire Instructions:

[Redacted Wire Instructions]

Mail Instructions:

[Redacted Mail Instructions]

September 19, 2025

859382-250919365

Kevin Dooley Kent, Receiver
 Clark Hill PLC
 Two Commerce Square
 2001 Market Street, Suite 2640
 Philadelphia, PA 19103

Re: Federal Trade Commission v. Empire Holdings Group, LLC, also d/b/a Ecommerce Empire Builders and Storefunnels.net, et al (the "Action")

SERVICES RENDERED

By Alvarez & Marsal Disputes and Investigations, LLC
 through August 31, 2025 not previously invoiced

Name	Date	Description	Hours
Menendez, Sean	8/18/2025	Respond to W-9 question from client.	0.20
Menendez, Sean	8/20/2025	Return process planning.	0.50
Menendez, Sean	8/25/2025	Communications related to 2024 returns.	0.10
Menendez, Sean	8/28/2025	Communications related to 2024 returns.	0.10
Menendez, Sean	8/29/2025	Communications related to 2024 returns.	0.10
Menendez, Sean Total			1.00
Herring, Drew	8/28/2025	Empire intro call with Jenny.	1.00
Herring, Drew	8/28/2025	Review Empire Holdings Federal return.	2.25
Herring, Drew	8/29/2025	Teleconference with A&M team (Herring/Exarhos) regarding tax returns.	0.50
Herring, Drew	8/29/2025	Review documents related to Atlas Fund.	0.75
Herring, Drew	8/29/2025	Tax return preparation for Empire Holdings	2.00
Herring, Drew	8/29/2025	Review tax return for Empire Holdings Federal return.	4.50
Herring, Drew	8/30/2025	Communications to/from staff regarding tax return preparation.	0.50
Herring, Drew	8/30/2025	Review Empire Holdings Federal tax return.	1.25
Herring, Drew Total			12.75
Exarhos, Christopher	8/29/2025	Return preparation for Empire Holdings Group, LLC	2.00
Exarhos, Christopher	8/29/2025	Teleconference with A&M team (Herring/Exarhos) regarding tax returns.	0.50
Exarhos, Christopher	8/30/2025	Return preparation for Empire Partner network.	0.25
Exarhos, Christopher	8/30/2025	Return preparation for Atlas Fund LP.	0.75
Exarhos, Christopher	8/30/2025	Return preparation for Empire Holdings Group, LLC	1.90
Exarhos, Christopher Total			5.40
Grand Total			19.15



Alvarez & Marsal
Disputes and Investigations, LLC

November 4, 2025

Kevin Dooley Kent, Receiver
Clark Hill PLC
Two Commerce Square
2001 Market Street, Suite 2640
Philadelphia, PA 19103

INVOICE FOR SERVICES RENDERED
through October 31, 2025 not previously invoiced

Empire Holdings: 859382-251103330

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Forensic Analysis Team:				
Tracy Gosau	Director	2.20	\$575	\$1,265.00
Tax Team:				
Sean Menendez	Managing Director	3.50	\$850	\$2,975.00
Jennifer Palacios	Senior Director	14.50	\$635	\$9,207.50
Adalys Alvarez	Senior Associate	2.00	\$450	\$900.00
Drew Herring	Senior Associate	7.00	\$450	\$3,150.00
Christopher Exarhos	Associate	0.40	\$350	\$140.00
Total Hours & Fees:		29.60		\$17,637.50
Total this Invoice:				\$17,637.50
Payment Amount Due:				\$ 17,637.50

Wire Instructions:

[REDACTED]

Mail Instructions:

[REDACTED]

November 4, 2025

859382-251103330

Kevin Dooley Kent, Receiver
 Clark Hill PLC
 Two Commerce Square
 2001 Market Street, Suite 2640
 Philadelphia, PA 19103

Re: Federal Trade Commission v. Empire Holdings Group, LLC, also d/b/a Ecommerce Empire Builders and Storefunnels.net, et al (the "Action")

SERVICES RENDERED

By Alvarez & Marsal Disputes and Investigations, LLC
 through October 31, 2025 not previously invoiced

Name	Date	Description	Hours
Gosau, Tracy	9/8/2025	Review Receivership 12/31/2024 accounting records re: distributions/contributions.	1.10
Gosau, Tracy	9/9/2025	Review Receivership 12/31/2024 accounting records re: distributions/contributions.	0.30
Gosau, Tracy	9/10/2025	Review Receivership 12/31/2024 accounting records re: distributions/contributions.	0.30
Gosau, Tracy	10/1/2025	A&M call with counsel [REDACTED]	0.50
Gosau, Tracy Total			2.20
Menendez, Sean	9/10/2025	Review documents related to 2024 tax returns.	0.70
Menendez, Sean	9/11/2025	Review draft 2024 tax returns.	1.50
Menendez, Sean	9/12/2025	Review draft 2024 tax returns.	0.50
Menendez, Sean	9/25/2025	Billing.	0.10
Menendez, Sean	9/29/2025	Review 2024 tax returns related to questions from Peter Prusinowski.	0.20
Menendez, Sean	10/1/2025	Discuss Prusinowski liability issue.	0.50
Menendez, Sean Total			3.50
Palacios, Jennifer	9/1/2025	Review tax return draft and workpapers.	0.40
Palacios, Jennifer	9/4/2025	Review tax return draft and workpapers.	1.20
Palacios, Jennifer	9/5/2025	Review tax return draft and workpapers.	1.10
Palacios, Jennifer	9/8/2025	Review tax return draft and workpapers.	1.90
Palacios, Jennifer	9/9/2025	Review tax return draft and workpapers.	2.60
Palacios, Jennifer	9/10/2025	Review tax return draft and workpapers.	2.40
Palacios, Jennifer	9/11/2025	Review tax return draft and workpapers.	1.30
Palacios, Jennifer	9/12/2025	Review tax return draft and workpapers.	2.20
Palacios, Jennifer	9/26/2025	Email Correspondence to/from counsel [REDACTED]	0.40
Palacios, Jennifer	9/29/2025	Discuss [REDACTED]	0.20
Palacios, Jennifer	10/1/2025	Discuss [REDACTED]	0.80
Palacios, Jennifer Total			14.50
Alvarez, Adalys	9/12/2025	Revise 2024 tax returns.	1.65
Alvarez, Adalys	9/15/2025	Finalize 2024 tax returns and related filings.	0.35
Alvarez, Adalys Total			2.00
Herring, Drew	9/1/2025	Prepare updates to Empire Holdings tax returns.	0.25
Herring, Drew	9/2/2025	Review Empire Holdings tax returns.	1.50
Herring, Drew	9/6/2025	Review Empire Holdings tax returns.	0.50

Name	Date	Description	Hours
Herring, Drew	9/10/2025	Review and revise tax returns for Atlas Fund.	0.25
Herring, Drew	9/10/2025	Review Empire Holdings tax return.	0.50
Herring, Drew	9/11/2025	Revise Atlas Fund tax return.	2.50
Herring, Drew	9/11/2025	Revise Empire Holdings tax returns.	0.25
Herring, Drew	9/12/2025	Revise Atlas Fund tax returns.	1.25
Herring, Drew Total			7.00
Exarhos, Christopher	9/1/2025	Updating Receivership Accounting workpaper to include a Schedule C information.	0.25
Exarhos, Christopher	9/14/2025	Quality control review of federal and state returns for Atlas fund LP and Empire holdings group LLC.	0.15
Exarhos, Christopher Total			0.40
Grand Total			29.60

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**EMPIRE HOLDING GROUP LLC d/b/a
ECOMMERCE EMPIRE BUILDERS d/b/a
STOREFUNNELS.NET and PETER
PRUSINOWSKI,**

Defendants.

Civil Action

No. 2:24-cv-04949-WB

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a true and correct copy of the Receiver Kevin Dooley Kent's Motion for Approval of Fourth Interim Fee Application for the Period March 1, 2025 through October 31, 2025 was filed and served on all counsel of record via the Court's Electronic Filing System pursuant to Fed. R. Civ. P. 5(b).

Dated: November 11, 2025

s/ Robin S. Weiss

Robin S. Weiss, Esq.

Attorney for Receiver, Kevin Dooley Kent