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Attorney for the Independent Fiduciary, Jeanne Bryant

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

ALEXANDER ACOSTA, Secretary of the United  
States Department of Labor,

Plaintiff,

v.

MATTHEW D. HUTCHESON, HUTCHESON  
WALKER ADVISORS LLC, GREEN VALLEY  
HOLDINGS LLC, and the RETIREMENT  
SECURITY PLAN AND TRUST, f/k/a PENSION  
LIQUIDITY PLAN AND TRUST,

Defendants.

Case No.: 1:12-CV-00236-EJL

FEBRUARY AND MARCH 2019 INDEPENDENT FIDUCIARY REPORT  
AND FEE NOTICE OF COSTS AND EXPENSES

PURSUANT TO THE Preliminary Injunction entered on June 13, 2012 [Doc. 16], Jeanne  
B. Bryant, Independent Fiduciary for Retirement Security Plan & Trust (RSPT) submits this  
Report and Notice for the period beginning FEBRUARY 1, 2019 to MARCH 31, 2019.

## I. ACTIVITY REPORT

### ADMINISTRATIVE FEE COLLECTIONS

The Independent Fiduciary (“IF”) informed the Sponsoring Employers of the current status of their individual collections involving payment of the monthly administration fee. Attached as **Exhibit 1 and 2** are reports noting the collections and payments made from the account for previously approved fees and cost through MARCH 31, 2019. The Independent Fiduciary will continue to collect any unpaid monthly administration fees using the same process previously approved by the Court. Most of the work in FEBRUARY and MARCH involved the allocations and deposits of property tax recovery amounts and processing hardship distributions.

### ASSET RECOVERY EFFORTS

In the summer of 2012, the IF hired contingency counsel for asset recovery legal services. All administrative costs have been paid by the RSPT sponsor employers and/or the RSPT Plans on an ongoing basis, pursuant to the payment submission and approval procedures previously outlined in the court’s Preliminary Injunction Order entered on June 13, 2012.

### SUMMARY OF COMPLETED ASSET RECOVERY ACTIONS

#### Note Secured by Osprey Meadows Golf Course

The Note concerning the PCB investment was turned over to the RSPT asset recovery counsel in Idaho. A foreclosure action was filed against Green Valley Holdings and West Mountain Golf in 2013. The foreclosure sale of the golf course property took place in December 2016. The property has now been sold and a new owner has taken control of the course. The sale of the property closed on January 12, 2018, and as of the end of July 2018 RSPT held the proceeds of the sale of the course in a trust account. James (“Bill”) Fletcher asserted a claim to virtually all of the sale proceeds (after RSPT recovers amounts actually expended for

maintaining the course). The IF has pursued a judicial declaration regarding RSPT and Fletcher's various claims to the proceeds. Through federal court directed mediation, the IF and Fletcher reached a settlement and the case is now closed. The final mediated settlement saw RSPT received \$325,000 in tax payments and \$88,176.47 residual payment. Fletcher received \$760,000 plus reimbursement of \$35,000 for a property tax payment he made. During the months of FEBRUARY and MARCH, the IF continued to complete the work required to return all tax payments to participant accounts. Other amounts realized from the litigation recoveries less expenses at this time are currently being allocated for transfer to participant accounts later this year. After becoming aware of errors made by ASPIRE concerning the repayment of property taxes, the IF delayed the allocation of recoveries from litigation until that problem could be addressed. The IF held a conference call with the employer groups to discuss these issues and will be advising members when this process has been completed.

#### Surety Bond Litigation

After attempts to negotiate a settlement, on July 11, 2013, the IF initiated a lawsuit against Colonial Surety. The face amount of this bond was \$500,000. The Surety Bond company denied the claim alleging that the period of notice had already expired prior to notification by Monty Walker. In the denial of the claim, our lawsuit alleged, among other items, that Colonial in the denial of the claim had engaged in unfair and deceptive claims practices. Eventually, Colonial Surety agreed to pay \$225,000.00. After the payment of contingency counsel attorneys' fees, this action netted \$150,000.00 to the Plan.

### Wrongful Conversion of Assets

During the IF's investigation of Green Valley Holdings actions it was discovered that it purchased a house in Tamarack Resort and then quit claimed the house to the in-laws of Defendant Hutcheson. After further investigation it appeared that the in-laws may have funded the purchase. This case settled with net payment after contingency counsel's attorney's fees to the Plan \$40,000.00.

### REMAINING ASSET RECOVERY ACTIONS

In December 2016, after a demand letter was sent and denied, the IF initiated litigation in Idaho federal court against Matrix Trust Company (formerly MG Trust) alleging breaches of MG Trust's fiduciary duties to the Plan by allowing the funds to be taken by Hutcheson. The IF is seeking damages in the amount of \$3.2 million. The Idaho federal court ordered the case be transferred to the District of Colorado (where MG Trust is headquartered). The IF has now hired local counsel in Colorado to assist with the litigation with MG Trust, and has provided a \$2,500.00 retainer. Additionally, the IF's contingency counsel continues to manage and be actively involved in the MG Trust litigation. MG Trust renewed a Motion to Dismiss in the Colorado court, and all briefing is complete for that Motion. On Monday, March 25, 2019 the IF was advised that the U.S. District Court had granted MG Trust's Motion to Dismiss. The IF is reviewing the opinion. Participating employers were notified of a conference call held the following week. Fifteen employers participated on the call. The IF will make a determination regarding an appeal of the decision. If the decision by the IF is not to appeal, she will proceed to complete allocations and to complete the termination of the retirement plans in Retirement Security Plan and Trust.

## II. ANTICIPATED FUTURE ACTIVITIES AND RESOLUTION OF ISSUES

1. Early Withdrawal Procedures. As stated in earlier reports, an early withdrawal process has been discussed with the Department of Labor and the IF filed information and the process that would be followed in the November Report filed with the Court in early December 2012. There were no objections filed to that process. As of this Report, 22 employers have completed the early withdrawal process.

2. Valuations for Individual Employers. Employers under the terms of the RSPT Plans' Documents are required to provide an annual independent business valuation to the Plans' trustee and administrator. The co-trustee agreements executed by each sponsoring employer require a business valuation to be submitted by May 31<sup>st</sup> following the end of a plan year at December 31<sup>st</sup>. No valuations have been received to date for plan year 2018.

3. Directed Investments by Members. The IF has determined not to amend the Plan Document to allow participants to direct individual investments and to maintain the current Plan structure. Investment changes can be made by contacting the IF's office who, once receiving appropriate documentation, will issue instructions to ASPire.

4. Hardship Applications. The IF has received 19 hardship applications from participants. 17 hardship applications have been granted and 17 have been paid. Two remain pending for completed distribution forms and additional information; one was never completed by the participant; the other remains pending due to the fact the account has no liquid balance. The IF believes that, given the strict limitations on hardship distributions, no significant harm to the RSPT plans will occur if hardship applications are allowed to be processed. The IF has established procedures for handling hardship distribution applications and required minimum distributions, and after consultation with the DOL believes the previous Orders issued by the

Court allow the IF to process hardship distribution applications without any other Orders being required. The IF has adopted an amendment to the plan in order to assist members with this process and has sent out Notice of this amendment to the members.

### III. ACCOUNTINGS REGARDING THE RSPT PLANS

As noted in Section 18 of the June 13, 2012 Preliminary Injunction, before causing the RSPT Plans to pay compensation, fees or expenses, the IF is to provide written notice (the “Fee Notice”) of such compensation, fees or expenses, by filing the Fee Notice (such as set forth herein) with the Court, and by serving a copy of that filing to the Secretary of the U.S. Department of Labor, Employee Benefits Security Administration, Hutcheson and HWA. The IF intends to submit her Fee Notice and Activity Report on a monthly basis. If, within fifteen (15) days after filing of a Fee Notice, no objection to the Fee Notice, nor to payment by the Plan of the compensation, fees or expenses described therein, is filed with the Court, such compensation, fees or expenses shall be deemed reasonable expenses of the RSPT Plans and shall be paid by the RSPT Plans without further action or approval of the Court. The fees and expenses will be allocated as outlined above. In an effort to reduce costs, copies of this Report and Fee Notice are being posted to a website of the IF’s company Receivership Management, Inc. (“RMI”) and the participating employers will be given notice of the filing.

Attached hereto as **Exhibit 3** is a schedule of the hourly rates for the Independent Fiduciary and the hourly rates of any staff of Receivership Management, Inc. that might be used to carry out the terms of the Court’s June 13, 2012 Preliminary Injunction.

Attached hereto as **Collective Exhibit 4** are expense summaries for the period of FEBRUARY 1, 2019 and attached hereto as **Collective Exhibit 5** are expense summaries for the period of MARCH 1 – 31, 2019.

Total expenses, as listed on **Collective Exhibit 4** include \$1,309.00 in IF fees,\$437.50 in legal fees, \$1,524.00 in accounting fees, \$25.00 in IT fees, \$1,497.20 in contract labor and \$56.90 in expenses (which include ERISA bond payment and identified charges for other fees, postage, copies, telephone, travel, etc.) for the period of FEBRUARY 1- 28, 2019. Total expenses, as listed on **Collective Exhibit 5** include \$1,156.00 in IF fees,\$412.50 in legal fees, \$300.00 in accounting fees, \$25.00 in IT fees, \$1,910.80 in contract labor and \$108.04 in expenses (which include ERISA bond payment and identified charges for other fees, postage, copies, telephone, travel, etc.) for the period of MARCH 1-31, 2019. Please note that counsel have, as necessary, redacted exact descriptions of litigation issues in order to protect applicable privileges, and the IF may also redact the names of employers and or members as to protect the companies or the members involved when responding to individual questions if required. The IF believes that the remaining descriptions are sufficient for approval of the charges requested. All expenses and fees are separated between those costs necessary for administration and those costs necessary for asset recovery, and will be paid as noted in this Report.

In the absence of any objection, total reimbursement for \$2,465.00 in IF fees,\$850.00 in legal fees, \$1,824.00 in accounting fees, \$50.00 in IT fees, \$3,408.00 in contract labor and \$164.94 in expenses for administration and litigation will be paid from the Plan's expense reserve for FEBRUARY 1-MARCH 31, 2019 in accordance with the Court's June 13, 2012

Preliminary Injunction. The exact amounts and the parties to be paid are listed below:

1.	Jeanne Barnes Bryant	\$2,465.00	
2.	Berry & Tudor	\$850.00	
3.	Receivership Management Inc.	\$3,572.94	\$3,408.00/ Contract labor
	\$164.94/ Other expenses		
4.	Billy Spaulding, CPA	\$1,824.00	
5.	Mel Vernon – IT Consultant	\$50.00	

Pursuant to the Court's June 13, 2012 Preliminary Injunction [Doc. 16], if no objection is filed with the Court within fifteen (15) days after the filing of this Notice and Report, the IF will authorize payments due counsel and any other parties listed.

DATED this 6<sup>th</sup> day of May, 2019.

/s/ Matt Christensen

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MATTHEW T. CHRISTENSEN

Attorney for Jeanne B. Bryant, Independent  
Fiduciary for RSPT Plans



CERTIFICATE OF SERVICE

I hereby certify that on this 6<sup>th</sup> day of May, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the individual(s) so noted below.

D. Marc Sarata  
Robert Furst

Sarata.D.Marc@dol.gov  
Furst.Robert@dol.gov

All others as listed on the Court's ECF Notice.

I further certify that on the 6<sup>th</sup> day of May, 2019, I served a copy of the foregoing notice on the following individuals or entities via US Mail, postage prepaid.

Matthew D. Hutcheson  
33 Pinnacle Court  
Donnelly, ID 83615

Matthew D. Hutcheson 14620-023  
FCI Lompoc  
Federal Correctional Institution  
3600 Guard Road  
Lompoc, CA 93436

Matthew D. Hutcheson  
14076 Morell Road  
McCall, Idaho 83638

Monty W. Walker  
c/o R. Bradford Huss  
Trucker Huss, APC  
One Embarcadero Center, 12<sup>th</sup> Floor  
San Francisco, CA 94111

DATED: May 6, 2019

/s/           Matt Christensen            
Matthew T. Christensen

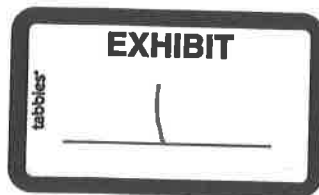
4/9/2019 10:15 AM

RSPT TRUSTEE FEES RECEIVED 2-1-19 / 2-28-19  
 (RECEIVED \$751,371.69 FROM INCEPTION THRU 2-28-19)

EXHIBIT 1 PAGE 1

ARCODE		Account	Amount
RSPT23201901	2175:RECVD	210	\$ 210.00
RSPT48201901	2175:RECVD	210	\$ 210.00
RSPT04201901	2175:RECVD	210	\$ 210.00
RSPT75201901	2175:RECVD	210	\$ 210.00
RSPT12201901	2175:RECVD	210	\$ 210.00
RSPT15201901	2175:RECVD	210	\$ 210.00
RSPT16201901	2175:RECVD	210	\$ 210.00
RSPT09201901	2175:RECVD	210	\$ 210.00
RSPT73201901	2175:RECVD	210	\$ 210.00
RSPT40201901	2175:RECVD	210	\$ 210.00
RSPT07201901	2175:RECVD	210	\$ 210.00
RSPT33201901	2175:RECVD	210	\$ 210.00
RSPT47201901	2175:RECVD	210	\$ 210.00
RSPT02201901	2175:RECVD	210	\$ 210.00
RSPT55201901	2175:RECVD	210	\$ 210.00
RSPT26201901	2175:RECVD	210	\$ 210.00
RSPT45201901	2175:RECVD	210	\$ 210.00
RSPT04201902	2175:RECVD	210	\$ 210.00
RSPT26201902	2175:RECVD	210	\$ 210.00
RSPT59201902	2175:RECVD	210	\$ 210.00
RSPT12201902	2175:RECVD	210	\$ 210.00

TOTAL: \$ 4,410.00



4/9/2019 10:26 AM

RSPT TRUSTEE FEES RECEIVED 3-1-19 / 3-31-19  
 (RECEIVED \$759,561.69 FROM INCEPTION THRU 3-31-19)

EXHIBIT 1 PAGE 1

ARCODE		Account	Amount
RSPT33201902	2175:RECVD	210	210.00
RSPT02201902	2175:RECVD	210	210.00
RSPT55201902	2175:RECVD	210	210.00
RSPT45201902	2175:RECVD	210	210.00
RSPT20201812	2175:RECVD	210	2,520.00
RSPT59201902	2175:RECVD	210	210.00
RSPT12201912	2175:RECVD	210	210.00
RSPT201912	2175:RECVD	210	210.00
RSPT55201903	2175:RECVD	210	210.00
RSPT15201903	2175:RECVD	210	210.00
RSPT07201903	2175:RECVD	210	210.00
RSPT48201903	2175:RECVD	210	210.00
RSPT40201903	2175:RECVD	210	210.00
RSPT02201903	2175:RECVD	210	210.00
RSPT09201903	2175:RECVD	210	420.00
RSPT33201902	2175:RECVD	210	210.00
RSPT12201902	2175:RECVD	210	210.00
RSPT04201902	2175:RECVD	210	210.00
RSPT73201902	2175:RECVD	210	210.00
RSPT2201902	2175:RECVD	210	210.00
RSPT19201902	2175:RECVD	210	1,470.00

TOTAL: \$ 8,190.00



## Receivership Management, Inc.

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510 Hospital Drive, Suite 490, Madison, TN 37115 (615) 370-0051 Fax (615) 373-4336

Effective April 1, 2016

### Fee Schedule for Receivership Management, Inc:

Independent Fiduciary/Receiver	\$170 per hour
Claims processing administration	
ERISA Matters-Employee Benefit	
Plan Administrator-Receiver	
Operations	\$160 per hour
Accounting	\$130 per hour
Accounting Assistant	\$79 per hour
Support Staff	\$61 per hour
Medical Claims Processing Consultant	\$65 per hour
Information Tech Consultant	\$65 per hour

Office Expenses which can be specifically identified to a project (eg. telephone, postage, copies etc.) are charged to the project as incurred.

Travel: Per Diem-\$39.00 for meals and incidentals (first and last day of travel 75% of per diem amount allowed). Per Diem paid only if overnight travel is required. Transportation: By private car: 47 cents per mile; By common carrier: Actual ticket cost at coach. Lodging: Actual amount charged.



**SUMMARY TIME SHEET**  
**SERVICES PROVIDED FOR RETIREMENT SECURITY PLAN & TRUST**  
**FOR THE PERIOD 2/1/2019 thru 2/28/2019**

<u>Jeanne Barnes Bryant</u>		
FEB 2018 FEES	<u>\$ 1,309.00</u>	
<u>Receivership Management, Inc.</u>		
FEB 2018 FEES - ADMIN	<u>\$ 1,497.20</u>	
RMI EXPENSES - FEB 2018 - ADMIN	<u>\$ 56.90</u>	
<u>Berry &amp; Tudor</u>	<u>\$ 437.50</u>	
<u>Billy Spaulding, CPA</u>	<u>\$ 1,524.00</u>	
<u>Mel Vernon - IT Consultant</u>	<u>\$ 25.00</u>	
<b>TOTAL FEBEMBER 2018 FEES</b>		<b><u><u>\$ 4,849.60</u></u></b>



FEBRUARY 2019

JEANNE BARNES BRYANT						
1325 SHEPARD DRIVE						
FRANKLIN, TN 37069						
BILL TO:						
RECEIVERSHIP MANAGEMENT, INC						
510 HOSPITAL DRIVE, STE 490						
NASHVILLE, TN 37217						
CLIENT REFERENCE: RSPT1						
DATE	INITIALS	COMPANY	DESCRIPTION	TIME	RATE	CHARGE
2/1/2019	JBB	RSPT1	EMAIL RE HARDSHIP QUESTION, EMAIL FROM ASPIRE	0.20	170.00	34.00
2/4/2019	JBB	RSPT1	EMAILS RE ASPIRE, MEETING WITH ROB MOORE RE TERMINATION ISSUES, EMAIL TO TUDOR RE SAME	0.50	170.00	85.00
2/5/2019	JBB	RSPT1	EMAIL RE DECEMBER REPORT, EMAIL RE ASPIRE ISSUES	0.30	170.00	51.00
2/6/2019	JBB	RSPT1	EMAIL RE DECEMBER REPORT TO DOL, MEETING WITH BYM TUDOR RE POSSIBLE TERMINATIONS	1.00	170.00	170.00
2/7/2019	JBB	RSPT1	EMAIL FROM DOL RE VALUATIONS, CALL AND EMAIL TO ROB MOORE RE SAME, EMAIL FROM PARTICIPANT, EMAIL FROM ROB MOORE RE SAME	0.30	170.00	51.00
2/8/2019	JBB	RSPT1	EMAIL FROM ROB MOORE RE VALUATIONS, EMAIL TO DOL RE SAME	0.20	170.00	34.00
2/11/2019	JBB	RSPT1	EMAIL FROM DOL RE DECEMBER REPORT, EMAIL TO COUNSEL RE SAME, EMAILS RE QUESTIONS FROM PARTICIPANTS, EMAIL TO ROB MOORE RE SAME	0.50	170.00	85.00
2/12/2019	JBB	RSPT1	EMAIL TO AND FROM COUNSEL, DISCUSSION WITH ROB MOORE RE CALL, DISCUSSION RE MEMBER REQUESTS, EMAIL RE DECEMBER REPORT, EMAIL RE WEBSITE	0.50	170.00	85.00
2/13/2019	JBB	RSPT1	CALL WITH ROB MOORE RE REQUEST FROM COUNSEL ON FUNDS, QUESTION RE CONFERENCE CALL, EMAIL RE SAME	0.20	170.00	34.00
2/14/2019	JBB	RSPT1	EMAILS TO AND FROM ROB MOORE RE CALL, EMAIL TO COUNSEL RE SAME	0.20	170.00	34.00
2/15/2019	JBB	RSPT1	EMAILS FROM MEMBERS RE QUESTIONS AND FOLLOWUP, EMAIL TO ROB MOORE RE SAME	0.20	170.00	34.00
2/18/2019	JBB	RSPT1	EMAIL TO ROB MOORE RE STATUS, CALL FROM ROB MOORE RE SAME, DISCUSSION RE HARDSHIP REQUEST AND OTHER REQUESTS	0.20	170.00	34.00
2/19/2019	JBB	RSPT1	EMAIL TO COUNSEL RE CHANGE TO DATE ON CALL, REQUEST FOR RESPONSE, DISCUSSION WITH ROB MOORE RE HARDSHIP	0.30	170.00	51.00
2/20/2019	JBB	RSPT1	EMAILS FROM ROB MOORE, DISCUSSION WITH ROB MOORE RE CALL	0.30	170.00	51.00
2/21/2019	JBB	RSPT1	EMAIL TO COUNSEL RE SCHEDULE, DISCUSSION WITH JERE COWAN RE EMAIL TO GROUP	0.20	170.00	34.00
2/22/2019	JBB	RSPT1	EMAILS RE HARDSHIP, EMAILS FROM ROB MOORE RE PROBLEM WITH ASPIRE CALCULATIONS, EMAIL RE CONFERENCE CALL	0.40	170.00	68.00

FEBRUARY 2019

2/25/2019	JBB	RSPT1	EMAIL TO COUNSEL RE CALL, EMAIL RE PROBLEMS WITH CHECKS, QUESTION RE JANUARY REPORT, CALL WITH ROB MOORE, EMAIL FROM ASPIRE	0.50	170.00	85.00
2/26/2019	JBB	RSPT1	EMAILS RE ASPIRE, CALL WITHY ROB MOORE, CONFERENCE CALL WITH GROUP, EMAIL TO JERE COWAN RE REPORT, EMAILS FROM BILLY SPAULDING	1.00	170.00	170.00
2/27/2019	JBB	RSPT1	QUESTIONS RE CALL AND REPORT, EMAIL RE SAME, EMAIL FROM ASPIRE	0.50	170.00	85.00
2/28/2019	JBB	RSPT1	EMAILS FROM ROB MOORE RE RESPONSE TO MEMBERS, EMAIL RE HARDSHIP, QUESTION RE ASPIRE	0.20	170.00	34.00
		<u>RSPT1 TOTAL</u>		<u>7.70</u>		<u>1,309.00</u>

Receivership Management, Inc.  
 P. O. Box 2307  
 Brentwood, TN 37024

Invoice for Professional Services

RETIREMENT SECURITY PLAN & TRUST - ADMIN		February 2019
2/1/2019	Lauren B. Garcia	0.1 \$61.00 \$6.10
	MESSAGE FROM MEREDITH ELLIS REQUESTING NAME AND ADDRESS CHANGE AND INFO REGARDING ACCOUNT FEES, FWD MESSAGE TO R MOORE	
2/1/2019	Makenzey R. Hill	0.1 \$61.00 \$6.10
	SPOKE WITH CLIENT REGARDING POSSIBLE RETIREMENT FUNDS; CORRESPONDENCE TO R. MOORE	
2/2/2019	Jacqui D. Lawson	0.2 \$79.00 \$15.80
	REVIEW BBS INVOICE FOR JANUARY AND APPROVE FOR ACCRUAL	
2/4/2019	Jacqui D. Lawson	0.2 \$79.00 \$15.80
	MONIES RECEIVED FOR 2018 NO PAY COMPANIES; EMAIL INSTRUCTIONS TO JCOWAN ON DEPOSITS	
2/4/2019	Jere P. Cowan	0.8 \$79.00 \$63.20
	RECEIPT FUNDS FROM ASPIRE; EMAIL R MOORE AND J LAWSON RE: SAME; POST UPDATE FINANCIAL RECORDS RE: SAME; RECEIPT PLAN ADMIN FEES; POST AND UPDATE ACCOUNTS RE: SAME; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNTS; RECEIPT RETURNED STATEMENTS	
2/4/2019	Jere P. Cowan	0.1 \$65.00 \$6.50
	TELEPHONE CONVERSATION WITH PARTICIPANT RE: ROLLOVER; EMAIL R. MOORE RE: SAME	
2/4/2019	Makenzey R. Hill	0.1 \$61.00 \$6.10
	CONVERSATION WITH CLIENTS REGARDING IMAILINGS OF 10-99 FORMS	
2/5/2019	Jere P. Cowan	0.6 \$79.00 \$47.40
	RECEIPT OF ADMIN FEE PAYMENTS; POST AND UPDATE FINANCIAL RECORDS; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING ACCOUNT RE: SAME	
2/5/2019	Lauren B. Garcia	0.2 \$79.00 \$15.80
	POST FEES AND EXPENSE ACCRUALS	
2/6/2019	Jere P. Cowan	0.5 \$79.00 \$39.50
	CONFERENCE WITH J BRYANT RE: FINALIZING DRAFT DEC REPORTING; FINALIZE DRAFT SUPPORTING FINANCIALS; FORWARD TO J BRYANT FOR DOL	

Tuesday, March 26, 2019

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February 2019

## RETIREMENT SECURITY PLAN &amp; TRUST - ADMIN

Date	Name	Description	Hours	Rate	Total
2/6/2019	Jere P. Cowan	EMAILS AND CONFERENCES RE: PARTICIPANT CALLERS	0.1	\$65.00	\$6.50
2/6/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
2/6/2019	Robert E. Moore, Jr.	MEETING WITH J.BRYANT AND B.TUDOR RE: POSSIBLE PROGRAM FOR NON-PCB HOLDERS AND ABANDONED PLANS TO PROCESS OUT IN LIGHT OF VARIOUS ERISA IRS ISSUES 1.0	1	\$160.00	\$160.00
2/7/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT REGARDING RETIREMENT FUNDS AND PAYOUT REQUEST FOR 401K FROM PREVIOUS EMPLOYER	0.1	\$61.00	\$6.10
2/7/2019	Robert E. Moore, Jr.	RESPOND TO A.PIERCE RE: PROPERTY TAX REFUND REPORTING .10; REVIEW QUESTIONS FROM M.SARTA RE: BUSINESS VALUATIONS AND RESPOND TO J.BRYANT .2	0.3	\$160.00	\$48.00
2/8/2019	Jere P. Cowan	RECEIPT, POST AND PROCESS EXPENSE PAYMENTS; FORWARD SAME	0.2	\$79.00	\$15.80
2/8/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT ANNA DELGADO ABOUT LAWSUIT AGAINST MG TRUST; CORRESPONDENCE CONVEY TO R. MOORE	0.1	\$61.00	\$6.10
2/11/2019	Jere P. Cowan	TELEPHONE CONVERSATION WITH N INGLE RE: INVOICE; RESEARCH AND ATTEMPT TO FORWARD; TELEPHONE CONVERSATION WITH INGLE OFFICE RE: FAX ISSUES; FORWARD SAME; DRAFT DEC STATUS REPORT AND SUPPORTING FINANCIALS; FORWARD TO J BRYANT FOR UPDATES; EMAIL FROM J BRYANT RE: DEC REPORT	0.8	\$79.00	\$63.20
2/11/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT REGARDING RETIREMENT FUNDS AND PAYOUT REQUEST FOR 401K FROM PREVIOUS EMPLOYER	0.1	\$61.00	\$6.10
2/12/2019	Jere P. Cowan	EMAIL FILED REPORT FROM M CHRISTENSEN; FORWARD STATUS REPORT FOR POSTING ON WEB	0.2	\$65.00	\$13.00
2/12/2019	Jere P. Cowan	RECEIPT OF PLAN FUNDS; EMAIL R MOORE RE: SAME; POST FUNDS AND UPDATE FINANCIAL REPORTING; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING ACCOUNT RE: SAME	0.6	\$79.00	\$47.40
2/12/2019	Lauren B. Garcia	CALL FROM J. ZEPHYR REQUESTING ACCT BAL ROLLOVER - FWD MSG TO R. MOORE	0.1	\$61.00	\$6.10
2/12/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
2/12/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT (ALAN PIERCE); LEFT MESSAGE TO R. MOORE	0.1	\$61.00	\$6.10
2/13/2019	Jere P. Cowan	EMAILS RE: WEB POSTING	0.1	\$65.00	\$6.50

Tuesday, March 26, 2019

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## February 2019

## RETIREMENT SECURITY PLAN &amp; TRUST - ADMIN

Date	Name	Description	Hours	Rate	Total
2/14/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT REGARDING RETIREMENT FUNDS AND PAYOUT REQUEST FOR 401K FROM PREVIOUS EMPLOYER; MESSAGE TRANSFERRED TO R. MOORE	0.1	\$61.00	\$6.10
2/14/2019	Robert E. Moore, Jr.	RESPOND TO QUESTIONS FROM M.BIRGE .10	0.1	\$160.00	\$16.00
2/15/2019	Lauren B. Garcia	CALL FROM PARTICIPANT REQUESTING STATUS OF HARDSHIP DISTRIBUTION REQUEST, FWD MESSAGE TO R.MOORE FOR FOLLOW-UP	0.1	\$61.00	\$6.10
2/15/2019	Makenzey R. Hill	CONVERSATIONS WITH CLIENTS REGARDING PROCEDURES FOR WITHDRAWAL OF FUNDS, CORRESPONDENCE UPDATES, AND STATUS OF CASE; QUESTIONS REFERENCED TO R. MOORE	0.2	\$61.00	\$12.20
2/18/2019	Jacqui D. Lawson	DISCUSSION W/LGARCIA OVER SETTLEMENT	0.3	\$79.00	\$23.70
2/18/2019	Lauren B. Garcia	REQUEST FROM B.SPAUDLING FOR DEPOSIT AND PAYMENT DETAIL - FORWARD REQUESTED DOCS	0.1	\$79.00	\$7.90
2/18/2019	Makenzey R. Hill	CONVERSATIONS WITH CLIENTS REGARDING RETIREMENT FUNDS, PAYOUT REQUESTS FOR 401K FROM PREVIOUS EMPLOYER, AND HOW TO ACCESS 10-99 FORMS	0.2	\$61.00	\$12.20
2/19/2019	Jacqui D. Lawson	POST EMPLOYEES IN QUICKEN THAT WAS ISSUED PROPERTY TAX REIMBURSEMENT; EMAIL BSPAUDLING; DISCUSSION OF BACKUP W/SPAUDLING; ANALYZE TRANSACTIONS IN QUICKEN; CREATE DATABASE OF FUNDS ON HAND FOR RSPTI; ENTER DEPOSITS VIA COMPANY IN QUICKEN; DISCUSSION W/RMOORE OVER PROPERTY TAX REIMBURSEMENTS; DATABASE OF ALL PLAN RECEIPTS & DISBURSEMENTS FOR 2016-2019.	3	\$79.00	\$237.00
2/20/2019	Makenzey R. Hill	ASSISTANCE WITH MAILING ADMINISTRATIVE EXPENSE STATEMENTS; CONVERSATION WITH CLIENT REGARDING CORRESPONDENCE AND REQUEST FOR WITHDRAWAL OF FUNDS; CONCERNS SHARED WITH R. MOORE VIA EMAIL	0.7	\$61.00	\$42.70
2/20/2019	Robert E. Moore, Jr.	EMAIL FROM M.HILL RE: HARDSHIP REQUEST FROM B.DERR .10	0.1	\$160.00	\$16.00
2/21/2019	Jere P. Cowan	CONFERENCES WITH J BRYANT AND R MOORE RE: PARTICIPANT NOTICE AND CONFERENCE CALL; EMAIL RE: CONFIRM WITH M CHRISTENSEN; EMAIL TO PARTICIPANTS RE: SAME	0.4	\$65.00	\$26.00
2/21/2019	Makenzey R. Hill	FOLLOW UP CONVERSATION WITH CLIENT REGARDING WITHDRAWAL OF FUNDS AND LITIGATION STATUS	0.1	\$61.00	\$6.10

Tuesday, March 26, 2019

Page 3 of 4

**February 2019**

**RETIREMENT SECURITY PLAN & TRUST - ADMIN**

Date	Name	Description	Hours	Rate	Total
2/21/2019	Robert E. Moore, Jr.	RESEARCH FILES AND RESPOND TO KATE FROM ANGSTMAN AND JOHNSON WITH DIRECTIONS ON CHECK PAYMENTS TO T&SP AND THE FORMER OWNERS OF TFIG INC .4	0.4	\$160.00	\$64.00
2/22/2019	Jacqui D. Lawson	MEETING W/B.SPAULDING PROPERTY REIMBURSEMENT TRANSACTIONS & RECEIPTS & DISBURSEMENTS OF PLAN FUNDS; DISCUSSION W/RMOORE OVER ASPIRE'S DISTRIBUTION OF FUNDS IN TO THE QES ACTS	2	\$79.00	\$158.00
2/22/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT REGARDING RETIREMENT FUNDS AND PAYOUT REQUEST FOR 401K FROM PREVIOUS EMPLOYER; MESSAGE TRANSFERRED TO R. MOORE	0.1	\$61.00	\$6.10
2/22/2019	Robert E. Moore, Jr.	RESPOND TO EMAIL FROM T.PAYTON RE: TAX REFUND AMOUNTS .3	0.3	\$160.00	\$48.00
2/25/2019	Makenzey R. Hill	CONVERSATION WITH CLIENT REGARDING RETIREMENT FUNDS AND PAYOUT REQUEST FOR 401K FROM PREVIOUS EMPLOYER DUE TO HARDSHIP; MESSAGE CONVEYED TO R. MOORE; ASSISTANCE WITH MAILING ADMINISTRATIVE EXPENSE STATEMENTS	0.2	\$61.00	\$12.20
2/26/2019	Jere P. Cowan	EMAIL FROM J BRYANT RE: REPORT	0.1	\$79.00	\$7.90
2/26/2019	Robert E. Moore, Jr.	EMPLOYER CALL RE: STATUS OF LITIGATION, DISCUSSION WITH J.BRYANT RE: PARTICIPANT MAILING, ASPIRE'S PROBLEMS IN ALLOCATIONS 1.0	1	\$160.00	\$160.00
<b>Total</b>					<b>\$1,497.20</b>

**BERRY & TUDOR, P.C.**

*A Professional Corporation*

5123 Virginia Way  
Suite B-23  
Brentwood, Tennessee 37027-7598

Telephone: (615) 726-1000

Fax: (615) 370-0077

FEIN: 62-1525112

Ms. Jeanne Barnes Bryant  
c/o Receivership Management, Inc.  
1101 Kermit Drive Suite 735  
Nashville, TN 37217-5100

March 1, 2019

Client #: 857

RE: Retirement Security Plan & Trust – General Administration

Invoice #: 21286

DATE	DESCRIPTION	HOURS	AMOUNT
Feb-06-19	Meet with J. Bryant and R. Moore re: PCB note recovery proceeds received; status of MG Trust litigation and possible relaxation of distribution freeze policy.	1.75	437.50 BET
<b>TOTAL FEES:</b>		1.75	\$437.50
<b>TOTAL DISBURSEMENTS:</b>			\$0.00
<b>TOTAL FEES &amp; DISBURSEMENTS:</b>			\$437.50
	Previous Balance		\$451.00
	Previous Payments		(\$301.00)

<b>PLEASE PAY:</b>	<b>\$587.50</b>
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**PAYMENT DUE WITHIN 30 DAYS OF STATEMENT. THANK YOU.  
PLEASE MAKE CHECKS PAYABLE TO BERRY & TUDOR, P.C.**

cc: Rob Moore via email

3/7/2019 8:50 AM

BILLY SPAULDING INVOICE FOR FEBRUARY 2019  
RSPT PLAN

PAGE 1

DATE	INITIALS	COMPANY	DESCRIPTION	TIME	RATE	CHARGE
2/18/19	BBS	RSPT1	PRINT HARD COPY OF TY 2017 F5500'S FILED IN EFAST 2. THIS COPY TO BE USED TO PROVIDE INFORMATION TO SET UP TY 2018 EFAST2 FILINGS AND ENTER PRIOR YEAR DATA.	3.00	120.00	360.00
2/19/19	BBS	RSPT1	DOWNLOAD 2018 RSPT DATABASE FEE ACTIVITY. PREPARE DOCUMENTATION OF 2018 FEE ACTIVITY AND ANALYZE.	2.00	120.00	240.00
2/20/19	BBS	RSPT1	ANALYSIS AND DOCUMENTATION OF RSPT2 PROPERTY TAX FUND WITHDRAWLS AND 2018 REIMBURSEMENTS.	2.00	120.00	240.00
2/22/19	BBS	RSPT1	MEET WITH J LAWSON TO DISCUSS AND ANALYZE RSPT2 FUNDS IN RMI BANK ACCOUNTS. PREPARE WORKSHEET DATABASE TO COMPARE TY 2018 PROPERTY TAX FUNDS SUBMITTED TO ASPIRE WITH AMOUNTS UPDATED ON RSPT DATABASE. DISTRIBUTE RESULTS.	3.00	120.00	360.00
2/23/19	BBS	RSPT1	ANALYZE 12-31-18 QES VALUES TO CONFIRM THAT TY 2018 PROPERTY TAX REFUND WAS NOT CORRECTLY APPLIED TO THESE PARTICIPANTS. DISTRIBUTE WORKSHEETS AND COMMENTS.	1.20	120.00	144.00
2/26/19	BBS	RSPT1	INSPECT SCHEDULE OF EMPLOYERS RECEIVING DIRECT PAYMENT FOR PROPERTY TAX RECOVERY. DOCUMENT TY 2018 F5500 FILING STATUS, DISTRIBUTE RESULTS.	1.50	120.00	180.00
					<u>12.70</u>	<u>1,524.00</u>

*Dr. Ho By*  
*R 8 m*  
*3-11-2019*  
RSPT

Melondie Vernon

1081 Mansker Farms Blvd

Hendersonville, TN 37206

February 2019

DATE	INITIALS	COMPANY	DESCRIPTION	TIME	TOTAL
2/12/2019	MKV	RSPT1	RSPT DECEMBER FILING POSTING	0.5	<u>25.00</u>
					<u>25.00</u>

RMI EXP RECOVERABLE RSPT1 - Feb 2019  
2/1/2019 through 2/28/2019

4/9/2019

Category	2/1/2019- 2/28/2019	OVERALL TOTAL
<b>5150 FEES LEGAL</b>		
5400-LEGAL FEES	-437.50	-437.50
<b>TOTAL 5150 FEES LEGAL</b>	<b>-437.50</b>	<b>-437.50</b>
<b>5150 FEES OTHER</b>		
5697-OTHER CONTRACT LABOR	-2,858.00	-2,858.00
<b>TOTAL 5150 FEES OTHER</b>	<b>-2,858.00</b>	<b>-2,858.00</b>
<b>5300 EXPENSE</b>		
6210-POSTAGE	-30.50	-30.50
6222-TELEPHONE LONG DISTANCE	-26.40	-26.40
<b>TOTAL 5300 EXPENSE</b>	<b>-56.90</b>	<b>-56.90</b>
<b>OVERALL TOTAL</b>	<b>-3,352.40</b>	<b>-3,352.40</b>

**SUMMARY TIME SHEET**  
**SERVICES PROVIDED FOR RETIREMENT SECURITY PLAN & TRUST**  
**FOR THE PERIOD 3/1/2019 thru 3/31/2019**

<u>Jeanne Barnes Bryant</u>	
MARCH 2018 FEES	<u>\$ 1,156.00</u>
<u>Receivership Management, Inc.</u>	
MARCH 2018 FEES - ADMIN	<u>\$ 1,910.80</u>
RMI EXPENSES - MARCH 2018 - ADMIN	<u>\$ 108.04</u>
<u>Berry &amp; Tudor</u>	<u>\$ 412.50</u>
<u>Billy Spaulding, CPA</u>	<u>\$ 300.00</u>
<u>Mel Vernon - IT Consultant</u>	<u>\$ 25.00</u>
<b>TOTAL MARCHEMBER 2018 FEES</b>	<b><u><u>\$ 3,912.34</u></u></b>





MARCH 2019

JEANNE BARNES BRYANT						
1325 SHEPARD DRIVE						
FRANKLIN, TN 37069						
BILL TO:						
RECEIVERSHIP MANAGEMENT, INC						
510 HOSPITAL DRIVE, STE 490						
MADISON, TN 37115						
CLIENT REFERENCE: RSPT1						
DATE	INITIALS	COMPANY	DESCRIPTION	TIME	RATE	CHARGE
3/1/2019	JBB	RSPT1	EMAIL FROM ROB MOORE RE RESPONSE ON QUESTIONS, EMAIL FROM ROB MOORE RE ASPIRE SOLUTUIONS	0.40	170.00	68.00
3/4/2019	JBB	RSPT1	REQUEST TO JERE COWAN, EMAIL RE JANUARY REPORT, REVIEW AND MAKE CHANGES, EMAIL TO ROB MOORE RE SAME	0.50	170.00	85.00
3/5/2019	JBB	RSPT1	REVIEW INVOICIS, QUESTION RE RESPONSES TO MEMBERS, EMAIL RE REPORT	0.20	170.00	34.00
3/7/2019	JBB	RSPT1	CALL AND EMAIL TO ROB MOORE RE STATUS, EMAIL RE PROPERTY TAX CREDITS	0.20	170.00	34.00
3/8/2019	JBB	RSPT1	UPDATE FROM JERE COWAN RE STATUS, DISCUSSION WITH ROB MOORE RE SCHEDULE	0.20	170.00	34.00
3/11/2019	JBB	RSPT1	CHECK WITH ROB MOORE RE STATUS ON OUTSTANDING LETTER AND PAYMENTS, QUESTION RE HARDSHIP	0.10	170.00	17.00
3/12/2019	JBB	RSPT1	EMAIL FROM ROB MOORE RE REPORT, QUESTION RE SAME	0.10	170.00	17.00
3/13/2019	JBB	RSPT1	EMAIL TO JERE COWAN RE CHANGES TO REPORT, EMAIL RE DOL, EMAIL TO DOL RE FILING, REVIEW EXHIBITS	0.50	170.00	85.00
3/14/2019	JBB	RSPT1	EMAILS RE HARDSHIP, QUESTIONS RE REPORT	0.30	170.00	51.00
3/15/2019	JBB	RSPT1	DISCUSSION RE RE TIMING AND SCHEDULES, QUESTION RE REPORT	0.20	170.00	34.00
3/18/2019	JBB	RSPT1	DISCUSSION WITH ROB MOORE RE LITIGATION, REPORT AND SCHEDULE FOR PAYMENTS	0.10	170.00	17.00
3/20/2019	JBB	RSPT1	EMAIL TO DOL RE STATUS	0.10	170.00	17.00
3/21/2019	JBB	RSPT1	EMAIL TO ROB MOORE AND JERE COWAN RE FEB REPORT	0.10	170.00	17.00
3/22/2019	JBB	RSPT1	EMAILS RE QUESTIONS FROM PARTICIPANTS, EMAIL FROM ROB MOORE RE SAME, EMAIL RE COURT FILING	0.30	170.00	51.00
3/25/2019	JBB	RSPT1	EMAIL FROM COUNSEL RE FILING, EMAIL RE COURT DECISION, REVIEW SAME, EMAIL AND CALL TO ROB MOORE, EMAIL TO COUNSEL RE FILING, EMAIL TO DOL RE DECISION	1.00	170.00	170.00
3/26/2019	JBB	RSPT1	EMAIL RE CONFERENCE CALL WITH DOL, CALL WITH DOL, DISCUSSION WITH ROB MOORE RE NEXT STEPS, QUESTION RE MAILING TO PARTICIPANTS, DISCUSSION WITH JERE COWAN RE WEBSITE AND EMAIL TO GROUP, EMAIL TO COUNSEL RE CALL	1.50	170.00	255.00
3/27/2019	JBB	RSPT1	CALL WITH COUNSEL, EMAILS FROM PARTICIPANTS, DISCUSION RE COURT REPORT ON RULING	0.50	170.00	85.00

MARCH 2019

3/28/2019	JBB	RSPT1	DRAFT EMAIL FOR GROUP, EMAIL TO ROB MOORE AND JERE COWAN, EMAIL TO COUNSEL, EMAIL TO GROUP, EMAIL RE HARDSHIPS, EMAIL FROM ROB MOORE RE NEXT STEPS AND ISSUES RE SAME	0.50	170.00	85.00
		<u>RSPT1 TOTAL</u>		<u>6.80</u>		<u>1,156.00</u>

Receivership Management, Inc.  
510 Hospital Drive, Suite 490  
Madison, TN 37115

Invoice for Professional Services

<b>RETIREMENT SECURITY PLAN &amp; TRUST - ADMIN</b>					<b>March 2019</b>
3/1/2019	Jacqui D. Lawson	REVIEW EMAILS FROM A. MILLWARD SAME R. MOORE	0.2	\$79.00	\$15.80
3/1/2019	Robert E. Moore, Jr.	EMAIL TO MR. PARKER RE: LAFAYETTE PARKER EXPLANATION OF ACCOUNT RECOVERY AND ALLOCATIONS RESEARCH SAME.7	0.7	\$160.00	\$112.00
3/4/2019	Jere P. Cowan	CONFERENCE AND EMAIL WITH J BRYANT RE: STATUS REPORT AND SUPPORTING FINANCIALS; FORWARD DRAFT	0.3	\$79.00	\$23.70
3/4/2019	Lauren B. Garcia	RECEIPT OF HARDSHIP AFFIDAVIT, FWD. TO R. MOORE FOR REVIEW	0.1	\$61.00	\$6.10
3/5/2019	Jere P. Cowan	RECEIPT OF PLAN FUNDS; POST AND UPDATE FINANCIAL ACCOUNT RE: SAME; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING ACCOUNT	1.1	\$79.00	\$86.90
3/7/2019	Jacqui D. Lawson	REVIEW CONTRACT LABOR INVOICE FOR APPROVAL	0.1	\$79.00	\$7.90
3/7/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUALS	0.3	\$79.00	\$23.70
3/11/2019	Jere P. Cowan	RECEIPT, POST AND PROCESS EXPENSE PAYMENTS; FORWARD SAME TO R MOORE FOR APPROVAL; FORWARD; RECEIPT ADMIN FEE PAYMENTS; POST AND UPDATE FINANCIAL RECORDS; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNT RE: SAME	1.3	\$79.00	\$102.70
3/11/2019	Lauren B. Garcia	POST FEE AND EXPENSE ACCRUAL	0.1	\$79.00	\$7.90
3/12/2019	Jacqui D. Lawson	MEETING W/BSPAULDING RE: ASPIRE DATABASE & REIMBURSEMENT OF PROPERTY TAX FUNDS; DISCUSSION W/RMOORE 2018 AUDIT	2	\$79.00	\$158.00
3/12/2019	Jere P. Cowan	EMAIL FROM R MOORE RE: STATUS REPORT	0.1	\$79.00	\$7.90
3/12/2019	Lauren B. Garcia	REVIEW ANGSTMAN FEB 19 INVOICES AND PAST DUE BALANCE	0.1	\$79.00	\$7.90

Tuesday, April 09, 2019

Page 1 of 3

**RETIREMENT SECURITY PLAN & TRUST - ADMIN****March 2019**

Date	Name	Description	Hours	Rate	Total
3/12/2019	Robert E. Moore, Jr.	DRAFT ACTIVITY REPORT .6	0.6	\$160.00	\$96.00
3/13/2019	Jere P. Cowan	RECEIPT OF RETURNED PARTICIPANT PLAN STATEMENTS	0.1	\$79.00	\$7.90
3/13/2019	Jere P. Cowan	FINALIZE STATUS REPORT; EMAILS WITH J BRYANT AND R MOORE RE: SAME; PREPARE SUPPORTING FINANCIALS FOR SAME AND UPDATE STATUS REPORT; FINALIZE AND FORWARD TO J BRYANT	1	\$79.00	\$79.00
3/13/2019	Lauren B. Garcia	PREPARE FINANCIAL EXHIBIT FOR JANUARY 2019 COURT REPORT INCLUDING 210 FEES AND EXPENSE RECOVERABLE REPORT, FWD SUPPORTING DOCUMENTS ALONG WITH REPORTS TO J.COWAN	0.6	\$79.00	\$47.40
3/14/2019	Jere P. Cowan	RECEIPT OF RETURNED ADMIN STATEMENTS; RECEIPT OF ADMIN FEE PAYMENTS; POST AND UPDATE FINANCIAL RECORDS RE: SAME; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNTS; EMAIL FROM J BRYANT RE: STATUS REPORT	1.1	\$79.00	\$86.90
3/14/2019	Robert E. Moore, Jr.	PROCESS HARDSHIP DISTRIBUTION R.ROBINSON .25; CALL WITH B.TUDOR RE: CONCERNS OVER ASPIRE'S CORRECTIVE CONTRIBUTIONS TO THE RSPT PLANS AS THEIR DELAY CAUSED LOST EARNINGS 1.0	1.25	\$160.00	\$200.00
3/19/2019	Jere P. Cowan	PREPARATION OF ADMIN STATEMENTS; CONFERENCE WITH M HILL RE: SAME	0.3	\$79.00	\$23.70
3/19/2019	Lauren B. Garcia	EMAIL FROM H.COLLIER RE RSPT STATUS, REPLY	0.1	\$61.00	\$6.10
3/19/2019	Makenzey R. Hill	ASSISTANCE WITH MAILING ADMINISTRATIVE EXPENSE STATEMENTS	0.9	\$61.00	\$54.90
3/21/2019	Jere P. Cowan	EMAIL RE: STATUS REPORT UPDATE	0.1	\$79.00	\$7.90
3/22/2019	Jere P. Cowan	EMAIL FROM R. MOORE RE: CONFERENCE CALL	0.1	\$65.00	\$6.50
3/25/2019	Jere P. Cowan	EMAIL FROM J BRYANT RE: WEB POSTING	0.1	\$65.00	\$6.50
3/25/2019	Robert E. Moore, Jr.	UPDATE FROM COUNSEL RE: DECISION OF U.S. DISTRICT COURT TO GRANT MG TRUST MOTION TO DISMISS .4; DISCUSSION OF RESULTS AND PLAN FORWARD WITH J.BRYANT 1.0	1.4	\$160.00	\$224.00

Tuesday, April 09, 2019

Page 2 of 3

**RETIREMENT SECURITY PLAN & TRUST - ADMIN** **March 2019**

Date	Name	Description	Hours	Rate	Total
3/26/2019	Jere P. Cowan	EMAILS WITH J BRYANT RE: STATUS REPORT; PREPARE FEB STATUS REPORTING AND SUPPORTING FINANCIALS FOR SAME; EMAIL L GARCIA RE: EXPENSES; REVIEW EXPENSES AND INVOICES FOR SAME; PREPARE FINAL DRAFT FOR J BRYANT AND R MOORE REVIEW AND EDITS; EMAILS RE: WEB POST	1.6	\$79.00	\$126.40
3/26/2019	Lauren B. Garcia	PREPARE FINANCIAL EXHIBITS FOR FEBRUARY 2019 COURT FILING, FWD TO J.COWAN FOR FILING	0.4	\$79.00	\$31.60
3/26/2019	Makenzey R. Hill	ASSISTANCE WITH MAILING ADMINISTRATIVE EXPENSE STATEMENTS	0.1	\$61.00	\$6.10
3/26/2019	Robert E. Moore, Jr.	PREPARE HARDSHIP DISTRIBUTION DOCUMENTS FOR M.FUENTES 1.15	1.15	\$160.00	\$184.00
3/26/2019	Robert E. Moore, Jr.	RESPOND TO D.STAZCAK RE: BVSG ENTERPRISES .10	0.1	\$160.00	\$16.00
3/27/2019	Jere P. Cowan	RECEIPT PLAN FUNDS; POST AND UPDATE FINANCIAL RECORDS RE: SAME; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING FINANCIAL ACCOUNT FOR SAME	0.8	\$79.00	\$63.20
3/28/2019	Jere P. Cowan	RECEIPT ADMIN FUNDS; POST AND UPDATE FINANCIAL RECORDS RE: SAME; PREPARE MATERIALS FOR REGIONS; TRAVEL TO REGIONS UPDATING ACCOUNT	0.8	\$79.00	\$63.20
3/28/2019	Jere P. Cowan	CONFERENCES WITH J BRYANT AND R MOORE RE: REPORTING AND GROUP UPDATE; PREPARE EMAIL FOR GROUP; EMAIL RE: WEB POSTING;	0.2	\$65.00	\$13.00
<b>Total</b>					<b>\$1,910.80</b>

**BERRY & TUDOR, P.C.**

*A Professional Corporation*

5123 Virginia Way  
Suite B-23  
Brentwood, Tennessee 37027-7598

Telephone: (615) 726-1000

Fax: (615) 370-0077

FEIN: 62-1525112

Ms. Jeanne Barnes Bryant  
c/o Receivership Management, Inc.  
510 Hospital Drive, Suite 490  
Madison, TN 37115-5049

April 1, 2019

Client #: 857

RE: Retirement Security Plan & Trust – General Administration

Invoice #: 21305

DATE	DESCRIPTION	HOURS	AMOUNT	
Mar-14-19	Emails from and to R. Moore re: calculation of lost earnings; telephone conference with R. Moore re: same.	0.60	150.00	BET
Mar-25-19	Email from R. Moore re: dismissal order; review same; telephone conference with R. Moore re: same.	0.25	62.50	BET
Mar-26-19	Review MG Trust opinion (continued); email to J. Bryant re: comments on same.	0.50	125.00	BET
Mar-26-19	Telephone conference with R. Moore re: Colorado district court decision.	0.30	75.00	BET

**TOTAL FEES:** 1.65 \$412.50

**TOTAL DISBURSEMENTS:** \$0.00

**TOTAL FEES & DISBURSEMENTS:** \$412.50

Previous Balance \$587.50

Previous Payments \$0.00

<b>PLEASE PAY:</b>	<b>\$1,000.00</b>
--------------------	-------------------

**PAYMENT DUE WITHIN 30 DAYS OF STATEMENT. THANK YOU.  
PLEASE MAKE CHECKS PAYABLE TO BERRY & TUDOR, P.C.**

cc: Rob Moore via email

4/9/2019 9:24 AM

BILLY SPAULDING INVOICE FOR MARCH 2019  
RSPT PLAN

PAGE 1

DATE	INITIALS	COMPANY	DESCRIPTION	TIME	RATE	CHARGE
3/2/19	BBS	RSPT1	ANALYSIS AND DOCUMENTATION OF ASPIRE RESPONSE TO APPLICATION OF LOST EARNINGS ON DELAYED PROPERTY TAX REIMBURSEMENTS. DISTRIBUTE WORKSHEET AND COMMENTS.	2.50	120.00	300.00
						-
						-
				<u>2.50</u>		<u>300.00</u>

Melodie Vernon

1081 Mansker Farms Blvd

Hendersonville, TN 37206

Services for March 2019

Job Description	Date	Hours Worked
Update RSPT Site (Jan 2019)	3/26/2019	0.5
RSPT	RSPT - Total Hours	0.5
	50 an hour	\$25



RMI EXP RECOVERABLE RSPT1 - Mar 2019  
3/1/2019 through 3/31/2019

4/10/2019

Page 1

Category	3/1/2019- 3/31/2019	OVERALL TOTAL
<b>5150 FEES LEGAL</b>		
5400-LEGAL FEES	-412.50	-412.50
<b>TOTAL 5150 FEES LEGAL</b>	<b>-412.50</b>	<b>-412.50</b>
<b>5150 FEES OTHER</b>		
5697-OTHER CONTRACT LABOR	-1,481.00	-1,481.00
<b>TOTAL 5150 FEES OTHER</b>	<b>-1,481.00</b>	<b>-1,481.00</b>
<b>5300 EXPENSE</b>		
6205-COPIES	-29.70	-29.70
6210-POSTAGE	-33.50	-33.50
6222-TELEPHONE LONG DISTANCE	-44.84	-44.84
<b>TOTAL 5300 EXPENSE</b>	<b>-108.04</b>	<b>-108.04</b>
<b>OVERALL TOTAL</b>	<b>-2,001.54</b>	<b>-2,001.54</b>