Matthew T. Christensen ANGSTMAN JOHNSON 3649 Lakeharbor Lane Boise, Idaho 83703

Telephone: (208) 384-8588 Facsimile: (208) 853-0117 Christensen ISB: 7213

Attorney for the Independent Fiduciary, Jeanne Bryant

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

THOMAS E. PEREZ, 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 2015 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 Thirty-Fourth Report and Notice for the period beginning February 1, 2015– February 28, 2015.

A♦J; Matter: 8571-002

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** is a report noting the collections and payments made from the account for previously approved fees and cost through February 2015. The Independent Fiduciary has recently collected any unpaid monthly administration fees using the same process previously approved by the Court.

ASSET RECOVERY EFFORTS

As previously reported, the IF hired contingency counsel for asset recovery legal services, and has received payment from ASPire for any amounts due for previously approved fees and costs concerning the PCB investment from those members holding such accounts. All 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.

The Note concerning the PCB investment has been turned over to the RSPT asset recovery counsel in Idaho. A foreclosure action was filed against Green Valley Holdings and West Mountain Golf. A Stipulated Order of Foreclosure was entered. The IF is working with asset recovery counsel on scheduling a sale and is advising the RSPT employer sponsors on an ongoing basis. The IF is currently disputing the ongoing use by property owners at Tamarack Resort (acting through the homeowners association, Tamarack Municipal Association, Inc. ("TMA")) of the golf course and lodge facilities securing the Note. These owners continue to assert the right to use the facilities pursuant to a previous lease agreement with West Mountain

FEBRUARY 2015 REPORT - PAGE 2

Golf which the IF (on behalf of RSPT as lender) has terminated, and which did not require any significant lease payments to West Mountain Golf. While there was discussion of a possible meeting with all the involved parties to take place as soon as possible to try to move forward with the sale, neither TMA nor the Lodge at Osprey Meadows Association ("LOMA" another party claiming required dues payments by RSPT should foreclosure occur) have shown an interest in working with the IF to resolve issues hampering the sale. Instead, TMA and LOMA have banned RSPT and its counsel from continuing discussions with other parties associated with the resort, and (as of the month of this report) TMA and LOMA seem to want to preserve a status quo whereby local homeowners and others benefit from the operation of the properties, without any income benefit to the RSPT plan. As a result, the IF has pursued a federal court complaint against TMA to get a court order requiring TMA to pay RSPT for the use of the resort property. This case remains pending, and the court ruled against TMA in its attempt to dismiss the claims. TMA has now asserted counterclaims against RSPT related to the dues payments and TMA's own operation of the golf course and lodge facilities. The IF has filed a Motion to Dismiss the counterclaims and a Motion for Summary Judgment on RSPT's claims under the lease (both motions remain pending). Discovery in that case remains ongoing, and the IF anticipates a trial in that case will likely take place sometime during the summer or fall of 2015. Depositions of Jeanne Bryant and Rob Moore took place March 19th and 20th in Boise, Idaho. In addition, the IF received on March 13th a letter concerning the property and information which was posted by TMA and is attached to this filing as **Exhibit 2**. As soon as there is any additional information that can be provided to the RSPT group concerning this litigation, the IF will advise the group.

The IF is also pursuing a fiduciary bond claim on the fiduciary bond insuring against Hutcheson's actions. This case remains ongoing, and mediation took place on this claim November 14, 2014, in Boise, Idaho. After a full day of effort, the parties were unable to reach an agreement. As a result, the litigation will proceed with discovery. We are seeking to move the litigation process as quickly as possible. The discovery deadline is April 17, 2015 and the Motions deadline is May 19, 2015.

The IF was also pursuing recovery of a house located within Tamarack Resort that was previously owned by Green Valley Holdings, LLC (Hutcheson's company that "borrowed" the funds from RSPT to purchase the golf course note and mortgage). After negotiation, the IF agreed to settle that matter for payment of \$60,000.00, and the settlement documentation is being finalized. When funds are received, after payment to counsel as provided in the previously-approved contingency agreement and payment of outstanding expenses, the balance will be returned to the plan. The IF also continues to investigate potential additional claims against additional parties and other avenues to recover funds for RSPT.

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 October Report filed with the Court in early December 2012. There were no objections filed to that process. As of this report 16 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

FEBRUARY 2015 REPORT - PAGE 4

and administrator. The co-trustee agreements executed by each sponsoring employer require a business valuation to be submitted by May 31 following the end of a plan year at 12-31.

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. The available mutual funds are not being changed.

4. Hardship Applications. The IF has received 10 hardship applications from participants. Six hardship applications have been granted and six have been paid. Three remain pending for completed distribution forms and additional information; 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.

FEBRUARY 2015 REPORT – PAGE 5

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, 2015 – February 28, 2015.

Total expenses, as listed on **Collective Exhibit 4** include \$1,605.00 in IF fees, \$2,324.96 in legal expenses, and \$3,277.31 in contract labor expenses (which include auditor fees and identified charges for other fees, postage, copies, telephone, travel, etc.) for the period of February 1, 2015 – February 28, 2015.

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

Case 1:12-cv-00236-EJL Document 74 Filed 03/26/15 Page 7 of 30

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 \$1,605.00 in IF fees, \$2,324.96

in legal expenses and \$3,277.31 in contract labor expenses for administration and litigation will

be paid from the Plan's expense reserve 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 \$1,605.00

2. Angstman Johnson \$2,324.96

3. Receivership Management Inc. \$3,277.31

\$2,727.50/Contract labor

\$549.81/Other expenses

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

proceed to authorize payments due counsel and any other parties listed.

DATED this 26th day of March, 2015.

/s/ Matt Christensen

MATTHEW T. CHRISTENSEN

Attorney for Jeanne B. Bryant, Independent

Fiduciary for RSPT Plans

FEBRUARY 2015 REPORT – PAGE 7

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of March, 2015, 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.

Jamila B. Minnicks minnicks.jamila@dol.gov
Michael R. Hartman hartman.michael@dol.gov
Michael A. Schloss schloss.michael@dol.gov
Raymond E. Patricco raymond.patricco@usdoj.gov

Michael J. Elia mje@mbelaw.net

J. Graham Matherne gmatherne@wyattfirm.com

Matthew T. Christensen mtc@angstman.com

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

I further certify that on the 26th day of March, 2015, 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 14076 Morell Road McCall, Idaho 83638

Monty W. Walker c/o R. Bradford Huss Trucker Huss, APC One Embarcadero Center, 12th Floor San Francisco, CA 94111 Matthew D. Hutcheson 14620-023 Federal Correctional Institution

P.O. Box 3007

Terminal Island, CA 90731

DATED: March 26, 2015

/s/ Matt Christensen
Matthew T. Christensen

A◆J; Matter: 8571-002

3/25/2015 9:21 AM

RSPT TRUSTEE FEES RECEIVED 02-01-15 / 02-28-15 (RECEIVED \$408,781.69 FROM INCEPTION THRU 02-28-15)

EXHIBIT 1 PAGE 1

COCODE	ARCODE	Date	Amount
RSPT103	RSPT103 201502	2/2/2015	210.00
RSPT73	RSPT73 201502	2/2/2015	210.00
RSPT13	RSPT13 201502	2/2/2015	210.00
RSPT40	RSPT40 201501	2/2/2015	210.00
RSPT55	RSPT55 201502	2/6/2015	210.00
RSPT02	RSPT02 201502	2/6/2015	210.00
RSPT12	RSPT12 201502	2/9/2015	210.00
RSPT47	RSPT47 201502	2/9/2015	210.00
RSPT19	RSPT19 201502	2/9/2015	210.00
RSPT15	RSPT15 201502	2/9/2015	210.00
RSPT04	RSPT04 201502	2/9/2015	210.00
RSPT07	RSPT07 201502	2/9/2015	210.00
RSPT45	RSPT45 201502	2/10/2015	210.00
RSPT16	RSPT16 201502	2/10/2015	210.00
RSPT48	RSPT48 201502	2/12/2015	210.00
RSPT26	RSPT26 201502	2/13/2015	210.00
RSPT50	RSPT50 201502	2/13/2015	210.00
RSPT72	RSPT72 201502	2/13/2015	210.00
RSPT78	RSPT78 201501	2/19/2015	210.00
RSPT78	RSPT78 201412	2/19/2015	210.00
RSPT23	RSPT23 201502	2/19/2015	210.00
RSPT31	RSPT31 201502	2/19/2015	210.00
RSPT33	RSPT31 201502 RSPT33 201502	2/19/2015	210.00
RSPT67	RSPT67 201503	2/23/2015	210.00
RSPT65	RSPT65 201503	2/23/2015	210.00
RSPT32	RSPT32 201308	2/25/2015	210.00
RSPT32	RSPT32 201300 RSPT32 201309		
RSPT32	RSPT32 201319	2/25/2015	210.00
RSPT32	RSPT32 201310	2/25/2015 2/25/2015	210.00
	RSPT32 201311 RSPT32 201312		210.00
RSPT32		2/25/2015	210.00
RSPT32	RSPT32 201401	2/25/2015	210.00
RSPT32	RSPT32 201402	2/25/2015	210.00
RSPT32	RSPT32 201403	2/25/2015	210.00
RSPT32	RSPT32 201404	2/25/2015	210.00
RSPT32	RSPT32 201405	2/25/2015	210.00
RSPT32	RSPT32 201406	2/25/2015	210.00
RSPT32	RSPT32 201407	2/25/2015	210.00
RSPT32	RSPT32 201408	2/25/2015	210.00
RSPT32	RSPT32 201409	2/25/2015	210.00
RSPT32	RSPT32 201410	2/25/2015	210.00
RSPT32	RSPT32 201411	2/25/2015	210.00
RSPT32	RSPT32 201412	2/25/2015	210.00
RSPT32	RSPT32 201501	2/25/2015	210.00
RSPT32	RSPT32 201502	2/25/2015	130.00
RSPT59	RSPT59 201505	2/27/2015	210.00
RSPT75	RSPT75 201502	2/27/2015	210.00
RSPT73	RSPT73 201503	2/27/2015	210.00
			9,790.00

STEPHEN J. LORD

ATTORNEY AT LAW
409 WEST JEFFERSON STREET
BOISE, ID 83702
Telephone (208) 342-3953
Facsimile (208) 387-2728
Email: slatty@aol.com

March 13, 2015

Matthew T. Christensen Angstman Johnson 3649 North Lakeharbor Lane Boise, Idaho 83703

RE: Notice of TMA's Intent to Vacate Osprey Meadows Golf Course and other West Mountain Golf Assets

Dear Mr. Christensen:

This letter is to advise you, as attorney for Jeanne Bryant, the special fiduciary for the RSPT pensioners, that my client Tamarack Municipal Association Inc. (TMA), will be vacating all of the property owned by West Mountain Golf and subject to the 2012 Lease and Sublease and 2013 Extension effective no later than the close of business on April 2, 2015. TMA will vacate the property subject to the 2009 lease no later than April 12, 2015. TMA notes that you and your client may now have the opportunity to manage and operate these collateral assets. TMA will extend every courtesy for a smooth turnover if Ms. Bryant is so inclined. Mr. Hopkins and his counsel are copied for any actions they may need to take on behalf of investors in West Mountain Golf LLC.

Sincerely,

Stephen J. Lord Attorney at Law

cc Timothy J. Flaherty, Executive Director, TMA
Tamarack Municipal Association Board of Directors
Randy Hopkins, Hopkins Financial
Robert Faucher, Esq.

STEPHEN J. LORD
ATTORNEY AT LAW
409 WEST JEFFERSON STREET
BOISE, ID 83702
Telephone (208) 342-3953
Facsimile (208) 387-2728
Email: slatty@aol.com

March 13, 2015

Randy Hopkins
c/o Hopkins Financial Services, Inc., Managing Member of
West Mountain Golf LLC
910 East Carol Street (83646)
P.O. Box 670,
Meridian, ID 83680

RE: Notice of Intent to Terminate TMA-WMG Lease Agreements

Dear Randy:

My client Tamarack Municipal Association, Inc. (TMA) hereby informs you that, pursuant to section 4.2 in the 2012 Lease and Sublease between TMA and West Mountain Golf LLC (WMG) allowing TMA twenty (20) days notice of termination, TMA will vacate the golf course premises effective at the close of business on Thursday, April 2, 2015.

TMA also provides notice under our agreement from July 2009 that it will vacate the Lobby Level of the Lodge at Osprey Meadows premises no less than 30 days from the date of this letter.

If you have any questions, please contact Tim Flaherty or me.

Sincerely,

Stephen J Lord Attorney at Law

cc Timothy J. Flaherty, Executive Director, TMA
Tamarack Municipal Association Board of Directors
Robert Faucher, Esq.
Matt Christensen, Angstman Johnson on behalf of Jeanne Bryant

TMA TURNS OVER GOLF COURSE TO RECEIVER: in a notice just distributed to Tamarack home owners, TMA states that it is giving up control of the golf course to the receiver for RSPT. See the notice here:

TAMARACK MUNICIPAL ASSOCIATION TURNS OVER MANAGEMENT OF OSPREY MEADOWS GOLF COURSE

Tamarack Municipal Association, Inc. (TMA), the master owners' association at Tamarack Resort, has announced that it will hand over operation and management of the Osprey Meadows golf course, the golf maintenance and storage facilities, and the commercial spaces in the Lodge at Osprey Meadows to Jeanne Bryant, the court-appointed Independent Fiduciary for Retirement Security Plan and Trust (RSPT), effective Thursday April 2, 2015.

TMA has operated the Osprey Meadows Golf Course and the Lodge at Osprey Meadows commercial spaces including Morels restaurant, the spa facilities and the pool area since 2012 at the request of the course owner West Mountain Golf (WMG), which could no longer afford to operate, maintain and to irrigate the course or pay the operating and utility costs for the commercial spaces within the Lodge.

Recognizing that no maintenance to the facilities or irrigation to the course would have resulted in significant damage to the assets, TMA stepped up and assumed the responsibility for operating the facilities. TMA did so accepting significant financial risk by operating the course and demonstrated the same commitment and professionalism that it did when it took over the Tamarack Resort ski mountain operations in 2010.

Since 2012, TMA has provided significant financial support and worked hard to operate, maintain and improve the course for the benefit of all parties including WMG and its creditors, the homeowners, as well as guests and visitors to the resort. Many homeowners and local businesses in the community also contributed financially through the sponsorship of holes and with supplies of fertilizer and other materials as well as their time as volunteers maintaining the golf course. The contributions made by TMA far outstrip the amounts TMA agreed to spend operating the course.

These commitments and efforts have not been in vain as the golf course has been very well received, as evidenced by significant increased level of play over the last 3 seasons. Additionally, the course has also achieved statewide and national recognition.

TMA is proud that Golf Digest ranked Osprey Meadows the 32nd Best Public Course in America in 2013-14, a ranking of 4th in the state of Idaho and recently Golfweek designated the course as the 2015 "Best Course In Idaho You Can Play".

Tamarack Resort LLC and its assets were foreclosed upon by its creditors and ownership of the resort was transferred to its new owners, New TR Acquisition Co. LLC (NewTRAC) in March of 2014.

NewTRAC, the owner of the mountain operations assets and various real estate parcels at Tamarack, has decided to assume mountain operations at the resort and therefore will not be renewing the sublease for TMA to operate the mountain winter and summer recreation facilities effective May 1st, 2015.

NewTRAC has retained Replay Resorts of Vancouver, British Columbia to manage the operation of NewTRAC owned facilities

Last summer Ms. Bryant, as the trustee for the Retirement Security Plan & Trust (RSPT), the principal creditor of WMG, which still owns the course, filed suit against TMA. RSPT is an ERISA pension fund headquartered in Wichita Falls, Texas.

Ms. Bryant, on behalf of RSPT, is suing TMA for more than \$880,000 in rents and taxes (also not TMA's obligation) that RSPT claims it is owed for a period of time that TMA has been leasing the golf course, at a loss of income, and using its own resources for the maintenance, operation and management of Osprey Meadows.

Unfortunately, without any attempt to discuss or negotiate a new lease to allow TMA to continue to operate and maintain the golf course, restaurant, bar, pools, spa and fitness center, RSPT unilaterally and, in TMA's view unlawfully, sought not only to terminate the WMG lease but to impose new draconian lease terms including the rent claimed in her lawsuit.

TMA has repeatedly tried to explain to Ms. Bryant that RSPT likely faces even higher expenses, and bigger losses, than what TMA experienced during its time caring for this Tamarack Resort asset.

Although RSPT has a foreclosure judgment against Osprey Meadow's current owner WMG, Ms. Bryant has not yet held a sheriff's sale where RSPT could purchase the golf course. The purchase of the property is a step that Idaho law requires before the mortgage holder can take possession of the property.

The costs of the litigation, together with supporting the continued operating losses of the course and related facilities, have added an unacceptable burden on the TMA. Recently announced changes to TMA's operating capabilities, coupled with the litigation, will force TMA to serve notice on its landlord, WMG, of its intent to vacate WMG's premises no later than April 2, 2015.

TMA remains hopeful that RSPT will work to preserve the value of these fragile assets by engaging an operator this spring.

Any enquiries concerning the future operation of the golf course and commercial spaces in the Lodge should be directed to Jeanne Bryant, Receivership Management Incorporated, 783 Old Hickory Road, Brentwood, Tennessee, Telephone: 615-370-0051

Or her legal counsel, ANGSTMAN JOHNSON, 3649 N. Lakeharbor Lane, Boise, Idaho 83703 Telephone: 208-384-8588

Receivership Management, Inc.

783 Old Hickory Blvd., Suite 255 Brentwood, TN 37027 (615) 370-0051 Fax (615) 373-4336

Effective July 1, 2008

Fee Schedule for Receivership Management, Inc:

0 per hour
0 per hour
per hour
5 per hour

Information Tech Consultant \$65 per hour

Overhead charges are allocated pro-rata based upon the number of hours billed to a receivership. Currently overhead is billed at \$11.00 per hour. Overhead includes expenses of a general nature which cannot be charged to a specific receivership. Examples include depreciation on equipment, insurance, etc.

Rent is allocated to a receivership based on a physical presence (ie. Files, records, and other documentation) at the RMI location and the time spent on that receivership. It is by its nature an estimate and is normally set at the beginning of each quarter and remains constant during that quarter. The allocation is reviewed each month and if there is a material change in either the physical presence occupied or time spent on the receivership, the rent allocation is adjusted to reflect current conditions.

Office Expenses which can be specifically identified to a receivership (eg. telephone, postage, copies etc.) are charged to the receivership 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: 50 cents per mile; By common carrier: Actual ticket cost at coach. Lodging: Actual amount charged.

SERVICES PROVIDED FOR RETIREMENT SECURITY PLAN & TRUST FOR THE PERIOD 2/1/15 THROUGH 2/28/15

Jeanne Barnes Bryant			
FEB 2015 FEES - ADMIN		1,605.00	1,605.00
Receivership Management, Inc.			
FEB 2015 FEES - ADMIN		2,727.50	0.077.04
RMI EXPENSES - FEB 2015 ADMIN		549.81	3,277.31
Angstman Johnson			
FEB 2015 FEES	INV 51231	47.00	
FEB 2015 FEES FEB 2015 FEES-HAWLEY TROXELL	INV 51234 INV 287774	292.96 1,975.50	
FEB 2015 FEES	INV 51235	9.50	2,324.96
TOTAL FEES			7,207.27

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

Invoice for Professional Services

RETIREME	RETIREMENT SECURITY PLAN & TRUST - ADMIN	& TRUST - ADMIN		Ā	February 2015
2/2/2015	Jeanne Barnes Bryant	E-MAILS FROM ASPIRE AND ROB MOORE RE QUARTER AND QUESTIONS, QUESTIONS FROM MEMBERS RE STATUS, E-MAIL FROM ROB MOORE RE SAME		\$150.00	\$75.00
2/3/2015	Jeanne Barnes Bryant	E-MAIL FROM MEMBER RE QUESTION ON SALE, E-MAIL TO ROB MOORE RE SAME, E-MAIL FROM MEMBER RE QUESTIONS ON CERTIFICATES, E-MAIL TO COUNSEL RE REPORT, E-MAIL FROM COUNSEL RE LETTER ON BOND CASE, REVIEW SAME		\$150.00	\$75.00
2/4/2015	Jeanne Barnes Bryant	E-MAIL TO ROB MOORE RE E-MAIL TO GROUP, E-MAIL FROM GEOFF LEE RE WEBSITE		\$150.00	\$30.00
2/5/2015	Jeanne Barnes Bryant	CALLS FROM MEMBERS, QUESTION RE WEBSITE 0.2		\$150.00	\$30.00
2/6/2015	Jeanne Barnes Bryant	E-MAIL RE GROUP POSTING, E-MAIL FROM COUNSEL RE DEPOSITIONS AND CONFERENCE CALL, E-MAILS FROM ASPIRE, E- MAIL FROM ROB MOORE RE QUARTER ASPIRE REPORT		\$150.00	\$75.00
2/9/2015	Jeanne Barnes Bryant	DISCUSSION RE INTERROGATORY QUESTIONS, E-MAIL RE MEDIATION INVOICE, CALL WITH COUNSEL	1	\$150,00	\$150.00
2/10/2015	Jeanne Barnes Bryant	REVIEW AND SIGN FORMS FOR WITHDRAWALS, DISCUSSION RE SAME, E-MAIL FROM ROB MOORE AND ASPIRE RE WITHDRAWALS, E-MAILS FROM ROB MOORE RE MEMBER QUESTIONS		\$150.00	\$105.00
2/11/2015	Jeanne Barnes Bryant	E-MAIL FROM ROB MOORE RE WITHDRAWALS, QUESTION RE ASPIRE		\$150.00	\$45.00
2/12/2015	Jeanne Barnes Bryant	E-MAIL RE DEPOSITIONS, DISCUSSION WITH ROB MOORE RE SAME, 0.5 UPDATE REPORT, E-MAIL RE SAME		\$150.00	\$75.00
2/13/2015	Jeanne Barnes Bryant	E-MAILS FROM ASPIRE RE STATUS ON WITHDRAWALS AND POSTINGS		\$150.00	\$30.00
Tuesday, March 17, 2015	rch 17, 2015				Page 1 of 2

RETIREME	RETIREMENT SECURITY PLAN & TRI	& TRUST - ADMIN			February 2015
2/16/2015	Jeanne Barnes Bryant	E-MAILS FROM COUNSEL RE CALL, DISCUSSION RE DISCOVERY DEPOSITIONS, E-MAILS RE SETTLEMENT OFFER, E-MAIL FROM ASPIRE	_	\$150.00	\$150.00
2/17/2015	Jeanne Barnes Bryant	E-MAILS FROM ASPIRE, E-MAIL RE SETTLEMENT OFFER	0.2	\$150.00	\$30.00
2/18/2015	Jeanne Barnes Bryant	E-MAIL FROM COUNSEL RE FILINGS, REVIEW SAME, QUESTION RE VERIFICATION, E-MAILS FROM ASPIRE, REVIEW ASPIRE DOCUMENTS AND REQUEST FOR SIGNATURE	3 ← 06	\$150.00	\$150.00
2/19/2015	Jeanne Barnes Bryant	E-MAIL FROM COUNSEL RE INTERROGATORY RESPONSES, DISCUSSION WITH ROB MOORE RE TERMINATING PLANS	0.3	\$150.00	\$45.00
2/20/2015	Jeanne Barnes Bryant	E-MAILS FROM ASPIRE RE CHANGES, QUESTION RE SAME, E-MAIL FROM ROB MOORE RE SCHEDULE AND DEPOSITIONS, E-MAIL FROM COUNSEL RE DISCOVERY ANSWER CHANGES, CALL FROM COUNSEL RE SETTLEMENT, E-MAIL RE SAME	8.0	\$150.00	\$120.00
2/23/2015	Jeanne Barnes Bryant	E-MAIL FROM COUNSEL RE SETTLEMENT, RESPONSE RE SAME, E- MAIL FROM ASPIRE	0.3	\$150.00	\$45.00
2/24/2015	Jeanne Barnes Bryant	CALL FROM COUNSEL RE SETTLEMENT, QUESTIONS RE DEPOSITIONS, DISCUSSION WITH ROB MOORE RE WITHDRAWAL FORMS	0.5	\$150.00	\$75.00
2/25/2015	Jeanne Barnes Bryant	E-MAIL FROM COUNSEL RE TMA DEPOSITIONS AND REQUEST FOR DISCUSSIONS, RESPONSE RE SAME, E-MAIL FROM COUNSEL RE SAME, FINAL FORMS ON WITHDRAWALS WITH BANK	-	\$150.00	\$150.00
2/26/2015	Jeanne Barnes Bryant	E-MAIL FROM COUNSEL RE DEPOSITIONS, QUESTION RE COSTS, E-MAIL FROM ROB MOORE RE JANUARY REPORT, E-MAIL TO COUNSEL RE SAME	0.5	\$150.00	\$75.00
2/27/2015	Jeanne Barnes Bryant	E-MAIL FROM ASPIRE, DISCUSSION RE SCHEDULE AND DEPOSITIONS, E-MAIL TO DOL RE REPORT	0.5	\$150.00	\$75.00
Total					\$1,605.00

Tuesday, March 17, 2015

Page 2 of 2

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

Invoice for Professional Services

RETIREME	RETIREMENT SECURITY PLAN & TRUST - ADMIN	& TRUST - ADMIN		February 2015
2/2/2015	Robert E. Moore, Jr.	CALL WITH () RE: 1.2 QUESTIONS ON PLAN BALANCE AND PCB BALANCE, RESEARCH AND REPLY 1.2	\$130.00	\$156.00
2/2/2015	Sarah D. Forton	TRAVEL TO BANK, MAKE DEPOSIT, PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER	\$45.00	\$22.50
2/3/2015	Robert E. Moore, Jr.	REVIEW EMAIL FROM M.CHRISTENSEN RE: RESPONSE TO 0.3 DISCOVERY .2; PARTICIPANT CALL .10;	\$130.00	\$39.00
2/5/2015	Sarah D. Forton	CALLS FROM PARTICIPANTS RE: ANNUAL STATEMENT LETTERS 0.5	\$45.00	\$22.50
2/6/2015	Robert E. Moore, Jr.	REVIEW AND APPROVE 4TH QUARTER FEES FROM MG TRUST, INTERLAKE MANAGEMENT, ASPIRE FINANCIAL SERVICES, EMAIL APPROVAL TO A.MILLWARD .25; EMAILS TO AND FROM A.MILLWARD RE: PARTICIPANT TO SEARCHES .2	\$130.00	\$58.50
2/6/2015	Sarah D. Forton	TRAVEL TO BANK, MAKE DEPOSIT, PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER, RE- MAIL ANNUAL STATEMENT LETTERS RE: ADDRESS CORRECTIONS FROM PO, FORWARD QTRLY STATEMENTS RE: SAME, E-MAIL TO EMPLOYERS	\$45.00	\$67.50
2/9/2015	Robert E. Moore, Jr.	CONFERENCE CALL WITH M.CHRISTENSEN AND J.BRYANT RE: DISCOVERY QUESTIONS, REVIEW EMAILS ON SAME AND FORWARD TO M.CHRISTENSEN 2.0	\$130.00	\$260.00
2/9/2015	Sarah D. Forton	TRAVEL TO BANK, MAKE DEPOSIT, PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER	\$45.00	\$22.50
Tuesday, March 17, 2015	rch 17, 2015			Page 1 of 4

RETIREMI	RETIREMENT SECURITY PLAN & TRUST - ADMIN	& TRUST - ADMIN			February 2015
2/10/2015	Robert E. Moore, Jr.	PREPARE AND COMPLETE B.SPAULDING RE: CURRENT ADMINISTRATIVE FEE PAYMENTS BY PREPARE AND COMPLETE DOCUMENTS, UPDATE FROM S.FORTON ON CURRENT ADMINISTRATIVE FEE PAYMENTS BY ADMINISTRATIVE FEE PAYMENTS BY ADMINISTRATIVE FEE PAYMENTS, RESPOND TO EARLY WITHDRAWAL QUESTIONS FROM A.MILLWARD RE: DEFAULT IRA PROGRAM CALL, EMAIL TO	2.2	\$130.00	\$286.00
2/10/2015	Sarah D. Forton	PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER	0.5	\$45.00	\$22.50
2/11/2015	Robert E. Moore, Jr.	CALL WITH ALLISON MILLWARD RE: DEFAULT IRA PROGRAM, CENSUS LISTING OF ONLY PARTICIPANTS WITH ASSET BALANCES INCLUSIVE OF ADDRESSES .25; EMAIL TO A.MILLWARD RE: TRANSFER .10; UPDATE FROM S.FORTON ON STATUS OF ADMINISTRATIVE PAYMENTS. PARTICIPANT METERS PLAN STATUS, EMAIL UPDATE TO B.ELLIOTT RE: SAME .4	0.85	\$130.00	\$110.50
2/12/2015	Robert E. Moore, Jr.	CALL WITH J.BRYANT RE: DEPOSITION DATE .2; PARTICIPANT CALL .10	0.3	\$130.00	\$39.00
2/12/2015	Sarah D. Forton	WORK ON MOTION	-	\$45.00	\$45.00
2/13/2015	Robert E. Moore, Jr.	REVIEW AND COMPLETE AUTO IRA DISTRIBUTION FOR	0.7	\$130.00	\$91.00
2/13/2015	Sarah D. Forton	PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER	0.5	\$45.00	\$22.50
2/16/2015	Robert E. Moore, Jr.	UPDATE FROM J.BRYANT RE: DISCOVERY .10	0.1	\$130.00	\$13.00

Tuesday, March 17, 2015

RETIREME	RETIREMENT SECURITY PLAN & TRI	& TRUST - ADMIN			February 2015
2/17/2015	Robert E. Moore, Jr.	READ DRAFT DISCOVERY RESPONSES .4; REVIEW AND RESPOND TO	0.7	\$130.00	\$91.00
2/18/2015	Robert E. Moore, Jr.	REVIEW EMAILS FROM A.MILLWARD AND PARTICIPANT N. TO SAME .4	0.4	\$130.00	\$52.00
2/19/2015	Robert E. Moore, Jr.	COMPILE LISTING OF EARLY WITHDRAWAL PROGRAM PARTICIPANTS AND FORWARD TO M.CHRISTENSEN.4; REVIEW ACCOUNT AND CONFIRM TRANSFER OF ASSETS OF TRANSFER/MERGER DOCUMENTS TO M.WALKER AS TRUSTEE FOR ERPA /25	0.65	\$130.00	\$84.50
2/19/2015	Sarah D. Forton	TRAVEL TO BANK, MAKE DEPOSIT, PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER, NOTARIZE VERIFICATION PAGE FOR J BRYANT, E-MAIL TO ASPIRE RE: ADDRESS CORRECTIONS	-	\$45.00	\$45.00
2/20/2015	Robert E. Moore, Jr.	REVIEW EMAILS FROM M.CHRISTENSEN RE: DISCOVERY RESPONSES, CALL WITH M.CHRISTENSEN RE: SAME, INFORMATION FROM S.FORTON RE: AUDIT REPORT COPY REQUEST. 7	0.7	\$130.00	\$91.00
2/23/2015	Robert E. Moore, Jr.	PREPARE AUTO ROLLOVER FORMS FOR PARTICIPANT FOR PARTICIPANT FOR EXECUTION, FORWARD EXECUTED DOCUMENTS TO A.MILLWARD FOR PROCESSING TRANSACTION 1.0	1	\$130.00	\$130.00
2/23/2015	Sarah D. Forton	PREPARE BACKUP DOCUMENTATION TO SUPPORT DEPOSIT OF MONTHLY ADMIN FEES, POST INDIVIDUAL FEE RECEIPTS TO GENERAL LEDGER	0.5	\$45.00	\$22.50
2/24/2015	Robert E. Moore, Jr.	EMAIL FROM A.MILLWARD RE: ACKNOWLEDGED AND COUNTERSIGNED AUTO ROLL OVER AGREEMENT .10; PULL AND PROCESS STOCK TRANSFER SHARES, UPDATE I.BRYANT ON SAME, CALL WITH I.BRYANT AND M.CHRISTENSEN RE: DEPOSITION SCHEDULING, PREPARE WITHDRAWAL FORMS FOR PARTICIPANTS AND EARL RE: COMPLETED ENROLLMENT FORMS FOR TO A.MILLWARD FOR PROCESSING .2	2.05	\$130.00	\$266.50

Tuesday, March 17, 2015

Page 3 of 4

RETIREME	RETIREMENT SECURITY PLAN & TRUST - ADMIN	& TRUST - ADMIN			February 2015
2/25/2015	Billy B. Spaulding	POST BILLING RECEIPTS, RECONCILE TO GL AND SET UP FEBRUARY BILLING DATABASE.	_	\$110.00	\$110.00
2/25/2015	Robert E. Moore, Jr.	DRAFT TRANSFER LETTER TO M.WALKER RE: OLIVERATE OF S. 2; REVIEW EMAILS FROM M.CHRISTENSEN AND T.J. ANGSTMAN RE: LITIGATION QUESTIONS, REVIEW SAME WITH J.BRYANT .2; RESPOND TO QUESTIONS FROM S.FORTON RE: THE STATE OF ST	8.	\$130.00	\$104.00
2/25/2015	Sarah D. Forton	WORK ON EMPLOYER INVOICES	3	\$45.00	\$135.00
2/26/2015	Robert E. Moore, Jr.	REVIEW AND RESPOND TO EMAILS RE: DEPOSITION TRIP .2; CALL WITH J.BRYANT RE: SAME .3	0.5	\$130.00	\$65.00
2/26/2015	Sarah D. Forton	WORK ON MOTION 0.5	0.5	\$45.00	\$22.50
2/27/2015	Robert E. Moore, Jr.	RESPOND TO QUESTIONS FROM S.FORTON RE: BUSINESS VALUATION NOTICES .10; PULL AND RESEARCH TERMED COMPANIES RE: ADMINISTRATIVE EXPENSES 1.5	1.6	\$130.00	\$208.00
2/27/2015	Sarah D. Forton	CKUP ITHLY ADMIN VAL LEDGER	0.5	\$45.00	\$22.50
Total				iii	\$2,727.50

Tuesday, March 17, 2015

RMI EXPENSE RECOVERABLE RSPT 1 & 2 2/1/15 Through 2/28/15

Category Description	RSPT1-251 AD	OVERALL TOTAL
5250 OH ADJ TO BILL		
5690-RMI OH EXPENSE	425.70	-425.70
TOTAL 5250 OH ADJ TO BILL	425.70	-425.70
5300 EXPENSES		
6205-COPIES 6210-POSTAGE	-36.20	-36.20
6222-TELEPHONE LONG DISTANCE	-38.60	-38.60
TOTAL 5300 EXPENSES	-124.11	-124.11
OVERALL TOTAL	-549.81	-549.81

ANGSTMAN JOHNSON

ANGSTMAN JOHNSON

3649 N. Lakeharbor Lane Boise, ID 83703

(208) 384-8588

TAX ID 52-2300434

Receiver Management, Inc. Jeanne Bryant 783 Old Hickory Blvd., Suite 255 Brentwood, TN 37027

Initial: MAR 1 0 2015 Page: 1

> February 28, 2015 Statement No. 51231

For Professional Services Rendered Through February 28, 2015 8571-002: Perez v. Hutcheson, Case No. 12-CV-00236-EJL

Professional Services

2/26/2015

MTC

Review report.

Hours

Rate Amount

0.2000 235.00

47.00

Sub-total Professional Services:

47.00

Rate Summary

Matthew T. Christensen 0.2000 hours at \$

235.00 /hr

47.00

Total hours:

0.2000

Statement Summary

Current Fees and Expenses:

47.00

Previous Balance Due: Payments Since Last Billing: 258.50 0.00

RSPI

Required Retainer Per Engagement Letter:

0.00

PLEASE PAY THIS AMOUNT

305.50

ANGSTMAN JOHNSON

3649 N. Lakeharbor Lane Boise, ID 83703

> (208) 384-8588 TAX ID 52-2300434

Receiver Management, Inc. Jeanne Bryant 783 Old Hickory Blvd., Suite 255 Brentwood, TN 37027 MAR 1 0 2015

February 28, 2015 Statement No. 51234

For Professional Services Rendered Through February 28, 2015 8571-008: RSPT v. Mason Family Trust, Case No. CV2013-227C

Dueferates				
Profession				Hours
2/6/2015	MTC			0.2000
2/9/2015	MTC			0.3000
2/12/2015	MTC			0.3000
2/12/2015	RK			0.2000
2/16/2015	MTC			0.5000
2/16/2015	MTC			0.2000
2/19/2015	MTC			0.2000
2/20/2015	MTC			0.2000
2/23/2015	MTC			0.3000
2/24/2015	MTC			0.7000
	·	Sub-	total Professional Services:	19.00
Expenses				Amount
2/9/2015	M&M Cou	Dep	osition Transcript	273.96
			Sub-total Expenses:	273.96

Time Summary

Matthew T. Christensen 2.9000

Racquel Kotte

0.2000

Total hours:

3.1000

Statement Summary

Current Expenses:

292.96

Previous Balance Due:

295.06

Payments Since Last Billing:

0.00

PLEASE PAY THIS AMOUNT 588.02

SUMMARY TIME SHEET-ASSET RECOVERY

SERVICES PROVIDED FOR RETIREMENT SECURITY PLAN & TRUST FOR THE PERIOD 2/1/15 THROUGH 2/28/15

Angstman Johnson

FEB 2015 FEES-HAWLEY TROXELL INV 287774 1,975.50

FEB 2015 FEES

INV 51235

9.50

1,985.00

TOTAL FEES

1,985.00



Boise • Coeur d'Alene • Pocatello • Reno

ATTORNEYS AND COUNSELORS

Remit to: Hawley Troxell Ennis & Hawley LLP 877 Main Street, Suite 1000 Post Office Box 1617 Boise, Idaho 83701-1617 EIN: 82-0259668 208.344.6000 • Fax 208.954.5284 www.hawleytroxell.com

Matt Christensen Angstman Johnson 3649 N Lakeharbor Ln. Boise, ID 83703

Richard Mills McElroy Deutsch Mulvaney & Carpenter LLP 88 Pine Street, 24th Floor NY, NY 10005

File No.: 81600-0567 Billing Attorney: MWC December 10, 2014

Invoice No.: 287774

INVOICE

For services through 11/30/14 in connection with: Jeanne B. Bryant v. Colonial Surety Company and Jeanne B. Bryant v. Mason Family Trust; John Mason and Phyllis Mason

Legal Services

\$3,875.00

Disbursements & Other Charges:

\$76.00

Total Due This Invoice:

\$3,951.00

Each Party is Responsible for: \$1,975.50

Interest on past due amounts will be due if this Invoice is not paid on or before 01/09/15

Date	Attorney/Paralegal	Hours	Amount	Description of Legal Services
11/11/14	Merlyn W. Clark	3.20	\$800.00	Begin studying the mediation statements and materials submitted by the parties.
11/12/14	Merlyn W. Clark	3.00	\$750.00	Continue to study materials submitted by parties.
11/13/14	Merlyn W. Clark	1.80	\$450.00	Continue to study the Mediation statements and materials submitted by the parties.

PAYMENT DUE IN U.S. DOLLARS UPON RECEIPT OF INVOICE

Current charges only. Unpaid balances not included. Disbursements not yet recorded will be included in future invoices.

Case 1:12-cv-00236-EJL Document 74 Filed 03/26/15 Page 28 of 30

File No.: 81600-0567

December 10, 2014

Invoice No.: 287774

Date	Attorney/Paralegal	Hours	Amount	Description of Legal Services	
11/14/14	Merlyn W. Clark	7.50	\$1,875.00	Continue to review materials received from the parties to prepare for the mediation; conduct the mediation from 10:00 am to 4:30 pm.	

Summary of Legal Services		Title	Hours	Rate	Amount	
Merlyn W. Clark		Partner	15.50	\$250.00	\$3,875.00	
		Total Hours:	15.50		otal for Legal ervices:	\$3,875.00
Date	Disbursements a	Disbursements and Other Charges		Quantity	Amount	
11/14/14	Client Charges - F for mediation part Mills, M. Christens Montosa	ies K. Griffiths, M.	Cohen, R.	1	\$76.00	
				a S	otal For Disbursements and Other Charges:	\$76.00

Total Due This Invoice:

\$3,951.00

If payment is made by wire remittance, please direct to:

Hawley Troxell Ennis & Hawley LLP Depository Account Wells Fargo Bank, N. A. 877 W. Main St., Boise, ID 83702 Bank Routing #

Account #

Please reference your Hawley Troxell Account No.

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment, and you will not receive your check back from your financial institution.

ANGSTMAN JOHNSON

3649 N. Lakeharbor Lane Boise, ID 83703

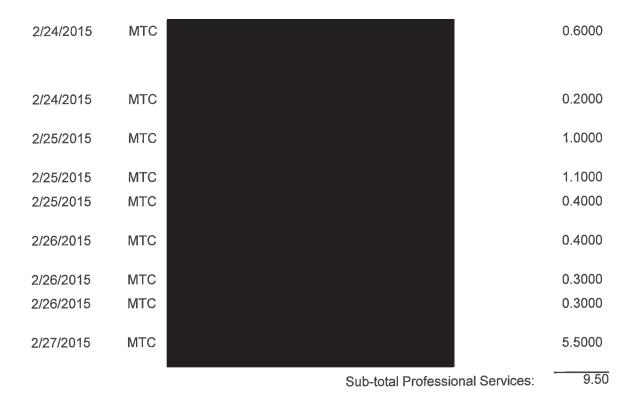
> (208) 384-8588 TAX ID 52-2300434

Receiver Management, Inc. Jeanne Bryant 783 Old Hickory Blvd., Suite 255 Brentwood, TN 37027 SIOS O I HAM Solis

February 28, 2015 Statement No. 51235

For Professional Services Rendered Through February 28, 2015 8571-011: Bryant/RSPT v. TMA; Case No. 1:14-CV-00339-BLW

Professional	Services	Hours
2/5/2015	MTC	1.8000
2/6/2015	RK	0.4000
2/0/2015	KK	0.1000
2/9/2015	MTC	0.5000
2/11/2015	TJ	2.0000
2/11/2015	MTC	1.0000
2/12/2015	MTC	0.1000
2/16/2015	MTC	2.1000
2/16/2015	MTC	0.6000
2/16/2015	MTC	0.5000
2/17/2015	MTC	1.4000
2/17/2015	MTC	1.8000
2/18/2015	MTC	0.6000
2/18/2015	MTC	1.0000
2/19/2015	MTC	0.8000
2/20/2015	MTC	1.6000
2/20/2015	MTC	4.0000
	MTC	1.0000
2/20/2015	MTC	0.4000



Time Summary

TJ Angstman

2.0000

Matthew T. Christensen 25.0000

Racquel Kotte

0.1000

Total hours:

27.1000

Statement Summary

Current Expenses:

9.50

Previous Balance Due:

450.00

Payments Since Last Billing:

0.00

PLEASE PAY THIS AMOUNT

459.50

PLEASE DO NOT PAY UNTIL ORDER OF THE COURT