Securities and Exchange Commission v. Nadel et al
Doc. 200 Att. 15

EXHIBIT
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FOWLER WHITE BOGGS
Attorneys at Law
Est 1943

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501 East Kennedy Blvd., Suite 1700
Tampa, Florida 33602

August 28, 2009
Invoice 723016
Tax # 59-1280172
Page 1
BWW/1090833

Re: **1090833**
Scoop Legal Team - Recovery from Investors

Professional Services Through 06/30/09

Asset Analysis and Recovery

05/01/09 Letter from I. McDonald regarding Kapralos (.2); letters from and to C. Nicholson regarding Dr. Gasparrini (.8); worked on Day settlements (1.6).

ASSET CRN 2.60 hrs.

05/04/09 Letter to D. Rappaport regarding Sandcastle (.3); letter to M. Hildreth regarding Day (.3); e-mail to S. Wood regarding settlement (.3); e-mail exchange with Grossman regarding T. Brooks (.4); further work on settlement (1.1).

ASSET CRN 2.40 hrs.

05/04/09 Review and revisions to Steven Wood Living Trust Settlement Agreement and Promissory Note (1.0); review of demand letter to Philip and Janice Day, review of correspondence regarding settlement with P. and J. Day (.2); drafting, review, and revisions to Settlement Agreement for Philip and Janice Day (.5); review of demand letter to Truman N. Brooks and review of correspondence regarding settlement with T. Brooks, drafting, review, and revisions to Settlement Agreement for T. Brooks and drafting, review and revisions to Promissory Note for T. Brooks (1.5); communications with C. Nelson regarding Settlement agreements with Steven Wood, Philip and Janice Day, Truman Brooks and Motion to Approve Settlement with Musser Family Trust (.3); e-mail to Steven Wood attaching corrected Promissory Note (.2); communications with C. Rehus regarding settlement documents and

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updates to settlements chart (.4); review of demand letter to Musser Family Trust and drafting, review and revisions to Motion to Approve Settlement with Musser Family Trust (.6).

ASSET SK1 4.70 hrs.

05/05/09 Received and reviewed order denying approval of Musser settlement (.2); letter to Musser enclosing Order (.3); letter to R. Walter regarding Dr. Fletcher (.3); received and reviewed letter from Musser filed with the Court (.3); edited and filed motion to approve Musser settlement (.3); e-mail exchange with Musser regarding approval (.4).

ASSET CRN 1.80 hrs.

05/05/09 Revisions and review of Motion to Approve Settlement with Musser Family Trust (.2); review of order denying motion to approve settlement of Musser (.1); review of letter from Gary Musser to Court (.2).

ASSET SK1 0.50 hrs.

05/06/09 Telephone conference with B. Smith regarding L. Perez (.3); e-mail exchange with G. Musser regarding revised settlement (.3); e-mail exchange with Musser regarding settlement (.4); call to Wanda Goldson regarding Musser (.5).

ASSET CRN 1.50 hrs.

05/06/09 Communications with C. Nelson regarding order denying motion to approve settlement of Musser and letter from Gary Musser to Court (.1); communications with C. Nelson regarding and review of Settlement Agreement with Truman Brooks (.2).

ASSET SK1 0.30 hrs.

05/07/09 Received Order Approving Musser settlement (.2); e-mail to Musser forwarding Order (.2); edited Brook settlement agreement (.3); letter to and from S. Wengert regarding settlement (.3); call to Judge's Chambers regarding motion procedure (.1); e-mail exchange with G. Musser regarding settlement (.4); prepared renewed motion to approve Musser settlement (.4); e-mail exchange with S. Grossman regarding Brooks (.4); e-mail to Dr. Trzeciak regarding execution of settlement agreement (.5).

ASSET CRN 2.80 hrs.

05/07/09	Review and revisions to Receiver's renewed motion to approve settlement with Musser Family Trust and review of May 6, 2009 letter from G. Musser to Court.	ASSET	SK1	0.20 hrs.
05/11/09	Letter from Timmick regarding recovery (.2); numerous e-mail exchanges with S. Grossman regarding T. Brooks (.5).	ASSET	CRN	0.70 hrs.
05/11/09	Review of e-mails with opposing counsel regarding proposed changes to Settlement Agreement and Note for Truman Brooks and review of proposed changes.	ASSET	SK1	0.20 hrs.
05/12/09	Calculations of potential recovery from profiteers (.5); review of revised settlement spreadsheet (.1).	ASSET	SK1	0.60 hrs.
05/14/09	Numerous e-mail exchanges with G. Musser regarding settlement.	ASSET	CRN	0.30 hrs.
05/14/09	Motion to approve settlement of Philip and Janice Day.	ASSET	SK1	0.50 hrs.
05/15/09	Received and reviewed Order approving day settlement (.3); e-mail exchange with S. Grossman regarding Brooks' settlement (.4).	ASSET	CRN	0.70 hrs.
05/15/09	Review of Order approving Receiver's Motion to Approve Settlement with Philip and Janice Day (.1); e-mail to opposing counsel enclosing Order approving Receiver's Motion to Approve Settlement with Philip and Janice Day (.2); review of executed settlement agreement with Truman N. Brooks and opposing counsel's requested changes (.2); e-mail and phone regarding same to C. Nelson (.3).	ASSET	SK1	0.80 hrs.

05/18/09	Letter to Campbell regarding Beale settlement (.3); letter to F. Moseley regarding settlement (.3); edited Settlement Agreement (.4); e-mail exchange with S. Grossman regarding Brooks' settlement (.5); letter to and from W. J. Jones regarding Cart settlement (.6).	ASSET	CRN	2.10 hrs.
05/19/09	Review of revised executed settlement agreement with Truman N. Brooks and executed promissory note (.3); review of e-mails with opposing counsel (.2); drafting, review, and revisions to Motion to approve settlement with Truman N. Brooks, communications with C. Nelson regarding revisions (.8); filing of Motion to approve settlement with exhibits (.7); communications with C. Nelson and review of file regarding outstanding settlement agreement and promissory note from Steven D. Wood Living Trust (.2).	ASSET	SK1	2.20 hrs.
05/20/09	Received and reviewed order approving Brooks settlement (.2); e-mail to S. Grossman with approval order (.2); letter to Harpst regarding Crut (.3); letter to J Fraser regarding D Fraser (.3); reviewed L. Yip account documents (1.2); reviewed Crut accounting documents (1.3).	ASSET	CRN	3.50 hrs.
05/20/09	Review of order granting approval of settlement with Truman N. Brooks (.1); review of e-mails with opposing counsel regarding Truman N. Brooks Settlement (.2); review of settlement chart and payments due (.2); communications with C. Nelson regarding Musser Family Trust settlement payment (.1).	ASSET	SK1	0.60 hrs.
05/22/09	Call to C. Chapin regarding S. Wood demand.	ASSET	CRN	0.20 hrs.
05/26/09	Letter from Nortman regarding Bullock.	ASSET	CRN	0.10 hrs.

05/27/09	Considered Defendant class action procedure and issues (.3); analyzed our Bullock account documents (2.4).	ASSET	CRN	2.70 hrs.
05/28/09	Call from Wellington regarding Yip (.2); letter to Nortman regarding Bullock (.2); letter to R. Kramer regarding Mace Security (.2); reviewed numerous account documents (1.3).	ASSET	CRN	1.90 hrs.
05/29/09	Call from Nortman regarding Bullock.	ASSET	CRN	0.20 hrs.
05/29/09	Receipt and review of correspondence and documentation from Ms. Moyers at PDR regarding investor and telephone call with Ms. Moyers.	ASSET	JCR	0.20 hrs.
06/01/09	Letter from L. Hutton regarding investment (.2); call from L. Rinn regarding investment (.3); conferred with Burt Wiand regarding recovery actions (.3); reviewed Hutton account documents (.4); call from C. Chapin regarding S. Wood (.8).	ASSET	CRN	2.00 hrs.
06/01/09	Review of documentation regarding investor per conference with Mr. Nelson.	ASSET	JCR	0.40 hrs.
06/02/09	Letter to Harpst regarding Crut (.4); letter to Dooley regarding Kouvant (.5); letter from and to R. Walter regarding J Fletcher (.5); letter to Lentz regarding Yip (.6); letter from and to LCKH3 regarding Viking Fund investment (.6).	ASSET	CRN	2.60 hrs.
06/02/09	Communicate with Bill Price regarding investor Merlyn Lofgren information used in false profiteer letter (.2); communicate with Carl Nelson regarding profiteer Lofgren and response to letter from Fiserv regarding investor Little (.2); preparation of correspondence to Fiserv per			

	conference with Mr. Nelson regarding J. Little (.2); communicate with Bill Price regarding investor information in Advent, QuickBooks and investor files and discuss Merlyn Lofgren investments and withdrawals and review of documentation (.3).	ASSET	JCR	0.90 hrs.
06/03/09	Reviewed Lofgren account.	ASSET	CRN	0.10 hrs.
06/03/09	Review of materials from Bill Price at PDR related to investor (1.0); review of materials from Northern Trust (.3); conferences with Mr. Price and Mr. Nelson (.2).	ASSET	JCR	1.50 hrs.
06/05/09	E-mail exchange with S. Weingert regarding settlement.	ASSET	CRN	0.10 hrs.
06/08/09	Letter from Nortman regarding Bullock.	ASSET	CRN	0.20 hrs.
06/09/09	E-mail to Nortman regarding Bullock (.5); e-mail to ABN Amro Bank regarding settlement (.8); reviewed all outstanding settlement cases (1.4).	ASSET	CRN	2.70 hrs.
06/09/09	Receipt and review of correspondence from investor in response to letter from C. Nelson.	ASSET	JCR	0.10 hrs.
06/09/09	Prepare requests for profiteer analyses to forensic accountant.	ASSET	KLS	2.30 hrs.
06/10/09	Call from Chapin regarding Wood.	ASSET	CRN	0.10 hrs.
06/10/09	Receipt and review of correspondence from Michelle Moyers at PDR			

	regarding investor McConnell to respond to letter from Investor.	ASSET	JCR	0.30 hrs.
06/10/09	Prepare requests for profiteer analyses to forensic accountant.	ASSET	KLS	1.00 hrs.
06/12/09	Provide data to forensic accountant regarding profiteers.	ASSET	KLS	0.70 hrs.
06/15/09	Call from Beech regarding Perez potential settlement (.2); telephone conference with Chapin regarding Wood (.2); e-mail to Nortman regarding Bullock (.7).	ASSET	CRN	1.10 hrs.
06/15/09	Review of correspondence to William Nortman, Esq. regarding investor.	ASSET	JCR	0.10 hrs.
06/18/09	Call from Forrest regarding Carty.	ASSET	CRN	0.30 hrs.
06/18/09	Communicate with Ashley Trehan and review of format of documentation sent to investors regarding false profits (.1); review of Foreign Bank Invesors chart prepared by Ms. Salo (.1); review of correspondence from foreign investor and circulate to Scoop team (.1).	ASSET	JCR	0.30 hrs.
06/19/09	Call from Louis Perez regarding settlement of Bullock (.2); e-mail to Perez regarding Bullock settlement (.2); call from Nortman regarding Bullock (.3); conferred with Burt Wiand regarding settlement of Bullock (.3); prepared Bullock Settlement Agreement (.7).	ASSET	CRN	1.70 hrs.
06/19/09	Communicate with PDR regarding account detail information needed for investor.	ASSET	JCR	0.10 hrs.

06/19/09	Communications with C. Nelson regarding drafting and revisions to settlement agreement and motion to approve settlement for Luis Perez (.2); review of Profiteer letter to Luis Perez in preparation for drafting settlement agreement and motion to approve settlement (.2); drafting, review and revisions to Settlement Agreement for Luis Perez (.7); drafting, review and revisions to Motion to Approve Settlement for Luis Perez (.6).	ASSET	SK1	1.70 hrs.
06/22/09	Receipt and review of spreadsheets and documents from Ms. Moyers at PDR regarding foreign investor Weatherhead and conference with Mr. Nelson (.5); research regarding MKM Longboat MS Fund per conference with Mr. Nelson (.2).	ASSET	JCR	0.70 hrs.
06/22/09	Compile back up and data for responses to profiteer inquiries.	ASSET	KLS	4.10 hrs.
06/23/09	Telephone conference with Nortman regarding Bullock (.4); telephone conference with Forrest regarding Carty (.4); letter from F. Moseley regarding settlement (.4); call from S. Alexander regarding Laurel Mountain easement (.7).	ASSET	CRN	1.90 hrs.
06/23/09	Communications with C. Nelson regarding preparation of settlement agreement and motion to approve settlement for Lincoln Trust - FBO Robert Bullock (.2); review of Demand Letter and correspondence regarding settlement with Robert Bullock in preparation for drafting settlement agreement and motion to approve settlement (.2); drafting, review and revisions of Settlement Agreement for Lincoln Trust-FBO Robert Bullock (.6); drafting, review and revisions of motion to approve settlement for Lincoln Trust-FBO Robert Bullock (.7); communications with C. Nelson regarding preparation of settlement agreement and motion to approve settlement Dr. John Fletcher (.2); review of Demand Letter and correspondence regarding settlement with Dr. John Fletcher in preparation for drafting settlement agreement and motion to approve			

settlement (.2); drafting review, and revisions of Settlement Agreement for Dr. John Fletcher (.6); drafting review and revisions of motion to approve settlement for Dr. John Fletcher (.5).

ASSET SK1 3.20 hrs.

06/24/09 E-mail to R. Walter regarding Fletcher (.3); e-mail to W. Nortman regarding Bullock (.3); call from L. Perez regarding settlement agreement (.4); edited Bullock Settlement Agreement (.4); edited Fletcher Settlement Agreement (.5).

ASSET CRN 1.90 hrs.

06/25/09 Conferred with Burt Wiand regarding Carty settlement (.3); e-mail to Forrest regarding Carty settlement (.3).

ASSET CRN 0.60 hrs.

06/26/09 Review of correspondence from investors (.2); review and organization from investor files in preparation for response per conference with Mr. Nelson (.8).

ASSET JCR 1.00 hrs.

06/26/09 Communications with C. Nelson regarding revisions to settlement agreement and motion to approve settlement for The James A. Carty Revocable Trust (.1); review of e-mail from opposing counsel for The James A. Carty Revocable Trust, regarding content of Settlement Agreement (.1); revisions and review to Settlement Agreement for The James A. Carty Revocable Trust, review and revisions to Motion to Approve Settlement for The James A. Carty Revocable Trust (.6); e-mail to C. Nelson enclosing drafts of Settlement Agreement and Motion to Approve Settlement for The James A. Carty Revocable Trust (.2).

ASSET SK1 1.00 hrs.

06/29/09 Received order approving Perez settlement (.1); conferred with Rizzo regarding accountings (.2); e-mail to Perez advising of settlement (.2); reviewed Krapalos account documents (.3); letter to McDonald regarding Krapalos (.3); e-mail to R. Forrest forwarding settlement agreement (.3); letter to C. McConnell regarding investment (.3); edited Carty Settlement Agreement (.5); edited and filed Perez motion to approve (.5).

		ASSET	CRN	2.70 hrs.
06/29/09	Communicate with Kathy Salo regarding packets of investor materials to respond to profiteer response letters.			
		ASSET	JCR	0.20 hrs.
06/30/09	Communication with forensic expert regarding profiteer analysis reports and upcoming second list of profiteers.			
		ASSET	KLS	0.60 hrs.
06/30/09	Monitoring settlement agreements, settlement payments, and approval orders and review of settlements chart.			
		ASSET	SK1	0.50 hrs.
TOTAL Asset Analysis and Recovery			**$18,807.00**	**73.00 hrs.**

Case Administration

06/26/09	Compile back up and data for response to profiteer inquiries.			
		CASE	KLS	0.20 hrs.
06/29/09	Continue with compilation and analysis of back up data for profiteer inquiry response (1.3); communication with forensic accountant regarding same (.4).			
		CASE	KLS	1.70 hrs.
TOTAL Case Administration			**$266.00**	**1.90 hrs.**

Summary of Fees

	Hours	Rate/Hr	Dollars
Carl R Nelson	41.50	325.00	13,487.50
Kathryn Salo	10.60	140.00	1,484.00
Jeffrey C Rizzo	5.80	140.00	812.00
Seema Kella	17.00	193.50	3,289.50
TOTAL	74.90		19,073.00

Fees for Professional Services Rendered ..... **$ 19,073.00**

Disbursements Through 06/30/09

06/29/09	Photocopies 26 pages		3.90
Total Disbursements		$	3.90

TOTALS FOR THIS INVOICE

Fees for Professional Services		19,073.00
Disbursements		3.90
TOTAL DUE FOR THIS INVOICE	**$**	**19,076.90**

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August 28, 2009
Invoice 723016
Tax # 59-1280172
BWW/1090833

Re: **1090833**
Scoop Legal Team - Recovery from Investors

*****REMITTANCE ADVICE*****

Payment is due upon receipt.
Please remit this page with your payment.

Fees Due This Invoice	**19,073.00**	
Disbursements Due This Invoice	**3.90**	
TOTAL DUE FOR THIS MATTER	**$**	**19,076.90**