

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE	§	
COMMISSION	§	
Plaintiff,	§	
	§	
	§	
v.	§	Case 04:17-CV-00336-ALM
	§	
THURMAN P. BRYANT, III and	§	
BRYANT UNITED CAPITAL FUNDING,	§	
INC.	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
ARTHUR F. WAMMEL, WAMMEL	§	
GROUP, LLC, THURMAN P. BRYANT,	§	
JR., CARLOS GOODSPEED a/k/a SEAN	§	
PHILLIPS d/b/a TOP AGENT	§	
ENTERTAINMENT d/b/a/ MR. TOP	§	
AGENT ENTERTAINMENT	§	
	§	
Relief Defendants.	§	

**AMENDED FIRST INTERIM FEE APPLICATION OF VERITAS
ADVISORY GROUP, INC. FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES**

Jennifer Ecklund, the Court-appointed Receiver (the “*Receiver*”) for the Thurman P. Bryant, III and Bryant United Capital Funding, Inc. (collectively, the “*Bryant Defendants*”), Relief Defendant Arthur F. Wammel, Relief Defendant Wammel Group, LLC, and Wammel Group Holdings Partnership (collectively, the “*Wammel Relief Defendants*”) receivership estates (together, the “*Receivership Estate*”)¹ in the above-captioned case (the “*Case*”), files this *Amended First Interim Fee Application of Veritas Advisory Group, Inc. for Allowance of Fees*

¹ References to the Receivership Estate in this Veritas First Interim Fee Application only include the estate of the Bryant Defendants, not the Wammel Relief Defendants.

and Reimbursement of Expenses (the “*Veritas First Interim Fee Application*”), and in support thereof, respectfully states as follows:

I.
FEE REQUEST SUMMARY

1. This Veritas First Interim Fee Application covers the period commencing on May 15, 2017, through June 30, 2017 (the “*Application Period*”), and requests approval of fees and expenses incurred by Veritas in this Case on an interim basis in accordance with the Order Appointing Receiver [Docket No. 17] and the Amended Order Appointing Receiver [Docket No. 48], the local rules of this Court, the Billing Instructions for Receivers in Civil Actions Commenced by the United States Securities and Exchange Commission (the “*SEC Billing Instructions*”) and other applicable orders of the Court. No previous interim applications have been filed, and Veritas has not been paid for any services in this Case.

2. This Veritas First Interim Fee Application encompasses a time of significant activity and related progress in carrying out the Receiver’s duties under the Receivership Order. As described more fully in the Receiver’s First Quarterly Report (defined below), since being appointed Receiver on May 15, 2017, the Receiver and her team have been working diligently to investigate and marshal assets of the Receivership Estate. For example, Veritas Advisory Group, Inc. (“*Veritas*”) has reviewed and analyzed numerous bank statements and documents to help determine and identify assets of the Receivership Estate. Veritas also compiled a summary of investors so that distributions from the proceeds of Receivership Estate assets can eventually be made to those investors.

3. At the same time, and as detailed in the First Quarterly Report, the liquid assets thus far identified are relatively low in amount. Accordingly, while this Veritas First Interim Fee Application details the fees and expenses the Receivership Estate has incurred for the services of

Veritas, it only seeks authorization, and not payment, of the Veritas Fees and Expenses (as defined below).

4. The following table summarizes the fees and expense the Receivership Estate, prior to the application of the Fee Cap (as defined below), incurred for Veritas during the Application Period:

TOTAL HOURS WORKED	BLENDED HOURLY RATE ²	TOTAL FEES AT HOURLY RATE	TOTAL EXPENSES	TOTAL FEES AND EXPENSES REQUESTED ³
466.25	\$195.44	\$91,122.75	\$10.64	\$91,133.39

5. The \$91,133.39 reflects a voluntary reduction in hourly rates across all timekeepers and will be further significantly reduced on application of the Fee Cap. Of the fees and expenses detailed herein, in recognition of the Case status and limited Receivership resources, at this time the Receiver is only seeking authorization, and not payment, of the Veritas Fees and Expenses in the amount of \$91,133.39.

6. For the reasons set forth below, the Receiver would respectfully show the following in support of the Veritas First Interim Fee Application:

II. **RELEVANT PROCEDURAL BACKGROUND**

7. On May 15, 2017, the Court entered the Order Appointing Receiver [Docket. No. 17], appointing Jennifer Ecklund as Receiver over the Thurman P. Bryant, III and Bryant United Capital Funding, Inc. On July 19, 2017, the Court entered the Amended Order Appointing Receiver [Docket No. 48] (the “*Receivership Order*”), expanding the Order Appointing Receiver to include the Receivership Defendants (as defined in the Receivership Order). The Receivership Order did not change the substance of the Receiver’s original powers. Pursuant to

² This rate is a discounted rate from Veritas’ standard hourly rates. *See* Docket No. 51 at Exhibit A.

³ This amount is subject to the Fee Cap and Hold Back (each as defined herein).

the Receivership Order, the Receiver is charged with marshaling and preserving all the assets of the Defendants. The Receiver is also charged with holding and operating all of the Defendants' assets pending further order of the Court. Further, the Receivership Order permits "the Receiver . . . to solicit persons and entities ("Retained Personnel") to assist [her] in carrying out the duties and responsibilities described in [the Receivership Order]. The Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement." Docket No. 48 at ¶ 56.

8. On June 13, 2017, and in accordance with the Receivership Order, the Receiver filed an Application to Employ Thompson & Knight LLP as Counsel to the Receiver Effective as of May 15, 2017 [Docket No. 31] (the "**T&K Application**"), attached to which was the Affidavit of Katharine Battaia Clark.

9. On June 30, 2017, the Court entered its Order Granting Employment of Thompson & Knight LLP as Counsel to Receiver Effective as of May 15, 2017 [Docket No. 38] (the "**Retention Order**"), approving the T&K Application.

10. On July 20, 2017, the Receiver filed her Request for Order Approving Receiver's Employment of Veritas Advisory Group, Inc. as Financial Consultant to Receiver Effective as of May 15, 2017 [Docket No. 51] (the "**Veritas Application**").

11. On July 31, 2017, the Receiver filed her Quarterly Report for Receivership Estates of (A) Thurman P. Bryant, III, and (B) Bryant United Capital Funding, Inc. [Docket No. 72] (the "**First Quarterly Report**").

12. The Case status has been discussed in detail in the First Quarterly Report and this Veritas First Interim Fee Application incorporates the First Quarterly Report, which includes the Standardized Fund Accounting Report, as if set out fully herein.

III. **FEES AND EXPENSES**

A. Fees and Expenses

13. During the Application Period, the Receivership Estate incurred \$91,122.75 in fees (the “*Veritas Fees*”)⁴ and \$10.64 in expenses (the “*Veritas Expenses*” and collectively, the “*Veritas Fees and Expenses*”) performed by Veritas on behalf of the Receiver. As described in more detail below, Veritas maintains time records of the Veritas Fees and Expenses in the regular course of its practice, with entries made by each person providing services in connection with rendering services in this Case.

14. The Veritas Fees and Expenses include a voluntary reduction by Veritas from its standard hourly rates, and are further subject to the Fee Cap and Hold Back (each as defined herein).

B. Case Administration

15. During the Application Period, Veritas performed numerous tasks in connection with this Case. Specifically, Veritas reviewed numerous bank statements to begin identifying the assets and creditors of the Receivership Estate, conferred with T&K and the Receiver regarding case strategy, compiled individual investor data, and prepared investor summaries. All of these activities were done in furtherance of the Receiver identifying Receivership Estate assets and liabilities so that distributions can ultimately be made to investors and non-investor creditors.

IV. **REQUEST FOR APPROVAL**

16. Through this Veritas First Interim Fee Application, the Receiver seeks interim approval of the Veritas Fees in the amount of \$91,122.75 and interim approval of the Veritas

⁴ The Veritas Fees reflect a voluntary discount from Veritas’ standard rates. See Docket No. 51 at Exhibit A.

Expenses in the amount of \$10.64, for a total amount \$91,133.39, subject to the Fee Cap and Hold Back (each as defined below) and the amounts awarded to the Receiver and T&K pursuant to the T&K First Interim Fee Application.

17. Fee Cap. This Veritas First Interim Fee Application is made subject to the cap on fees set forth in the Receivership Order. In particular, the Receivership Order provides that “[t]he Receiver’s fees—including all fees and costs for the Receiver and others retained to assist in the administration and liquidation of the Receivership Estate—are capped at \$75,000 during the initial 30-day period” (the “**Fee Cap**”). Docket No. 48 at ¶ 51. The Receivership Order also provides that “[f]urther fee limitations, including capping fees at sixty (60) or ninety (90) days after the entry date of [the Receivership Order], if any, will be set by the Court after the Receiver submits the first status report.” Docket No. 48 at ¶ 51. As of the filing of this Veritas First Interim Fee Application, the Court has not imposed additional fee limitations. Thus, only the fees requested for the 30-day period from May 15, 2017, through June 14, 2017, in this Veritas First Interim Fee Application are subject to the Fee Cap, which total \$52,621. Veritas, T&K, and the Receiver are working to negotiate a proposal for the application of the Fee Cap among the applicants and, unless the Court orders otherwise, in no event shall the Receiver or her Retained Professionals be paid an amount that exceeds the Fee Cap.

18. Hold Back. Pursuant to the Receivership Order, interim fee applications also “may be subject to a holdback in the amount of 20% of the amount of fees and expenses for each application filed with the Court” (the “**Hold Back**”). Docket No. 48 at ¶ 60. The Receivership Order further provides that “[t]he total amounts held back during the course of the receivership will be paid out at the discretion of the Court as part of the final fee application submitted at the

close of the receivership.” Docket No. 48 at ¶ 60. Thus, the amounts requested in this Veritas First Interim Fee Application may be subject to the Hold Back.

19. Fee Breakdown by Activity. Veritas has maintained the Veritas Fees by activity and by individual professional during the Application Period. Attached hereto as **Exhibit A** is a copy of the Veritas invoices, which summarizes the respective number of hours incurred relative to each task by Veritas professionals who performed services on behalf of the Receiver during the Application Period.

20. The following table summarizes the task description for the services that Veritas rendered during the Application Period:

TASK DESCRIPTION	HOURS WORKED	TOTAL FEES, SUBJECT TO APPLICATION OF THE FEE CAP AND THE HOLD BACK
[F170] Forensic Accounting	466.25	\$91,122.75

21. Expense Breakdown. Further, Veritas has maintained a description of the Veritas Expenses incurred during the Application Period. Also included in **Exhibit A** is a summary of all Veritas Expenses incurred during the Application Period.

22. In accordance with the SEC Billing Instructions, the Receiver submitted this Veritas First Interim Fee Application to the United States Securities and Exchange Commission (the “**SEC**”) for review prior to submission to the Court.⁵ [The SEC has reviewed the Veritas First Interim Fee Application and advised the Receiver as to non-substantial comments concerning this Veritas Fee Application and the Receiver has made such changes.

23. All services performed by Veritas were performed for and on behalf of the Receiver and not on behalf of any other individual or entity. No agreement or understanding exists between Veritas and any other entity for the sharing of compensation to be received for

⁵ By agreement, the SEC extended the deadline for submission of invoices to July 31, 2017.

services rendered in connection with this Case. The Receiver and Veritas' services have been substantial, necessary, and beneficial to the Receivership Estate. Based upon the total time expended and the complexity of this Case, the Receiver believes the Veritas Fees and Expenses sought herein to be reasonable and appropriate.

24. The Receiver notes that the liquid assets of the Receivership Estate are, at the time of the filing of this Veritas First Interim Fee Application, insufficient to satisfy the request for payment in this Veritas First Interim Fee Application. Therefore, the Receiver shall seek authority to pay the approved Veritas Fees and Expenses for this Application Period at the appropriate time in the future.

25. The tables below show a breakdown of the fees that are subject to the Fee Cap and the fees that are not subject to the Fee Cap incurred by the Receiver, T&K,⁶ and Veritas during the Application Period:

**FEES SUBJECT TO FEE CAP
(May 15, 2017 – June 14, 2017)**

Receiver	T&K	Veritas	Total Fees:	<u>Total Fees Due to Fee Cap:</u>
\$16,600.00	\$223,282.77	\$52,621	\$292,503.77	\$75,000

**FEES NOT SUBJECT TO FEE CAP
(June 15, 2017 – June 30, 2017)**

Receiver	T&K	Veritas	<u>Total Fees:</u>
\$9,050.00	\$64,014.00	\$38,501.75	\$111,565.75

⁶ For the avoidance of doubt, the fees and expenses of the Receiver and T&K for the Application Period are the subject of a separate fee application to be filed concurrently with this Veritas First Interim Fee Application.

WHEREFORE, the Receiver respectfully requests that this Court enter an order (i) approving and authorizing, on an interim basis, the Veritas Fees and Expenses, totaling \$91,133.39, subject to the Fee Cap and Hold Back, and (ii) awarding such other and further relief that this Court deems just and proper.

DATED: August 16, 2017.

Respectfully submitted,

THOMPSON & KNIGHT LLP

By: /s/ Katharine Battaia Clark

Timothy E. Hudson
State Bar No. 24046120
Tim.Hudson@tklaw.com

Katharine Battaia Clark
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Mackenzie S. Wallace
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THOMPSON & KNIGHT LLP
One Arts Plaza
1722 Routh Street, Suite 1500
Dallas, Texas 75201
Telephone: (214) 969-1700
Facsimile: (214) 969-1751

COUNSEL TO RECEIVER

CERTIFICATION

Pursuant to the SEC Billing Instructions, Veritas Advisory Group, Inc. (the “*Applicant*”) hereby certifies as follows:

1. The Applicant has read the First Interim Fee Application;
2. To the best of the Applicant’s knowledge, information, and belief formed after reasonable inquiry, the First Interim Fee Application and all fees and expenses herein are true and accurate and comply with the SEC Billing Instructions;
3. All fees contained in the First Interim Fee Application are based on the rates listed in the Applicant’s fee schedules attached hereto and such fees are reasonable, necessary, and commensurate with the skill and experience required for the activity performed;
4. The Applicant has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission); and
5. In seeking reimbursement for a service which the Applicant justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Applicant requests reimbursement only for the amount billed to the Applicant by the third-party vendor and paid by the Applicant to such vendor.


Brandi Kleinman

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2017, I electronically filed the foregoing document with the Clerk for the United States District Court, Eastern District of Texas. The electronic case filing system (ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. The foregoing document will also be sent to all counsel of record via the method identified below.

/s/ Katharine B. Clark

Katharine B. Clark

Via Electronic Mail:

COUNSEL FOR PLAINTIFF:

Jason P. Reinsch

Jessica B. Magee

U.S. SECURITIES AND EXCHANGE COMMISSION

Fort Worth Regional Office

Burnett Plaza, Suite 1900

801 Cherry Street, Unit #18

Fort Worth, TX 76102-6882

Telephone: (817) 900-2601

Facsimile: (917) 978-4927

reinschj@sec.gov

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PRO SE

By Electronic Mail:

Thurman P. Bryant, III

Treybryant03@gmail.com

COURTESY COPIES SENT TO THE FOLLOWING:

Via Electronic Mail:

Toby M. Galloway

KELLY, HART & HALLMAN LLP

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Telephone: (713) 574-8900
jimmy@ardoinlawpllc.com

COUNSEL FOR CERTAIN RELIEF DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that, as counsel for the Receiver, I have conferred with counsel for Plaintiff on August 14, 2017, in compliance with the meet and confer requirement in Local Rule CV-7(h). Counsel for Plaintiff is not opposed to the relief sought in this Motion.

I further certify that, as counsel for the Receiver, I have conferred with Defendant Bryant and with counsel for Relief Defendant Wammel on August 15, 2017, in compliance with the meet and confer requirement in Local Rule CV-7(h). Defendant Bryant opposes the relief requested by this Application as Defendant Bryant takes issue with the amounts requested in this Application. Relief Defendant Wammel does not yet take a position as to the relief requested in this Application, and is therefore noted as opposed for purposes of conference. To the extent Relief Defendant Wammel adopts a position that is not in opposition to the relief requested, the Receiver will notify the Court accordingly.

/s/ Katharine Battaia Clark _____

Katharine Battaia Clark

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE	§	
COMMISSION	§	
Plaintiff,	§	
	§	
	§	
v.	§	Case 04:17-CV-00336-ALM
	§	
THURMAN P. BRYANT, III and	§	
BRYANT UNITED CAPITAL FUNDING,	§	
INC.	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
ARTHUR F. WAMMEL, WAMMEL	§	
GROUP, LLC, THURMAN P. BRYANT,	§	
JR., CARLOS GOODSPEED a/k/a SEAN	§	
PHILLIPS d/b/a TOP AGENT	§	
ENTERTAINMENT d/b/a/ MR. TOP	§	
AGENT ENTERTAINMENT	§	
	§	
Relief Defendants.	§	

**ORDER APPROVING THE AMENDED FIRST INTERIM FEE APPLICATION
OF VERITAS ADVISORY GROUP, INC.**

CAME ON for consideration the Amended First Interim Fee Application of Veritas Advisory Group, Inc. for Allowance of Fees and Reimbursement of Expenses (the “*Veritas First Interim Fee Application*”).¹ The Court, after considering the relief requested in the Veritas First Interim Fee Application, the invoices submitted in support, and the Certification included therein, finds that proper and adequate notice of the Veritas First Interim Fee Application has been given and that no other or further notice is necessary and that the Veritas Fees & Expenses,

¹ All capitalized terms not defined herein shall be given their meanings ascribed to them in the Veritas First Interim Fee Application.

totaling \$91,133.39, are reasonable and appropriate for the work performed and the expenses incurred.

The Court further finds that during the time period covered by the Veritas First Interim Fee Application, the time spent, services performed, hourly rates charged, and expenses incurred by the Receiver and her retained professional, Veritas Advisory Group, Inc., were reasonable and necessary for the Receiver to perform her Court-ordered duties.

Therefore, the Court is of the opinion that the relief requested in the Veritas First Interim Fee Application should be GRANTED.

It is therefore

ORDERED that the Veritas Fees & Expenses, totaling \$91,133.39, are approved on an interim basis, subject to the Fee Cap, and that after application of the Fee Cap, the Court awards for this Application Period \$_____ (the “*Approved Veritas Fees & Expenses*”). It is further

ORDERED that the Receiver shall apply to the Court for permission to pay any remaining portion of the Approved Veritas Fees & Expenses at such time as the Receiver, in her discretion, believes there to be sufficient funds in the Receivership Estate to pay the requested portion of the remaining Approved Veritas Fees & Expenses.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case 04:17-CV-00336-ALM
	§	
THURMAN P. BRYANT, III and BRYANT UNITED CAPITAL FUNDING, INC.	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
ARTHUR F. WAMMEL, WAMMEL GROUP, LLC, THURMAN P. BRYANT, JR., CARLOS GOODSPEED a/k/a SEAN PHILLIPS d/b/a TOP AGENT ENTERTAINMENT d/b/a/ MR. TOP AGENT ENTERTAINMENT	§	
	§	
Relief Defendants.	§	

**APPENDIX TO AMENDED FIRST INTERIM FEE APPLICATION OF VERITAS
ADVISORY GROUP, INC. FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES**

<u>EXHIBIT</u>	<u>DOCUMENT</u>	<u>DOC ID</u>	<u>APPENDIX PAGE NUMBER</u>
A.	Veritas Invoices	19783722	APP. 001-7

EXHIBIT A
Veritas Invoices



June 16, 2017

Resubmission

Jennifer R. Ecklund, Esq.
 Thompson & Knight LLP
 One Arts Plaza
 1722 Routh Street, Suite 1500
 Dallas, Texas 75201

Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

Professional fees and expenses in connection with the above-referenced matter for the period of May 1, 2017 through May 31, 2017:

Professional Fees:

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Brandi N. Kleinman	Vice President	18.00 hrs. @	\$325	\$ 5,850.00
Brian L. Ingram	Senior Manager	9.25 hrs. @	\$248	\$ 2,294.00
Paul A. Forbes	Associate Consultant	50.25 hrs. @	\$175	\$ 8,793.75
Claire Sowards	Analyst	7.00 hrs. @	\$104	\$ 728.00
Total Professional Fees*				\$ 17,665.75

*As of the date of this invoice, the outstanding balance of prior invoices is \$00.00.



Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

Description of Activities for Task Code F170 Forensic Accounting

(May 1, 2017 through May 31, 2017)

Date	Activity	Kleinman	Ingram	Forbes	Sowards
5/17	Review pleadings and documents provided(3); Conduct TX SOS Research(1)	4.00			
5/17	Create index of files produced to date and compare for duplicates.		2.25		
5/17	Review documents.			5.00	
5/18	Review pleadings and documents provided	4.00			
5/18	Research defendants' companies/entities.			6.50	
5/19	Review documents.			4.00	
5/20	Download additional files and add them to index.		4.00		
5/22	Review and analyze documents	2.50			
5/22	Preparation for and meeting with Counsel	1.00			
5/22	Meeting with counsel		1.00		
5/22	Meeting with client.			1.00	
5/22	Review documents.			2.50	
5/23	Review and analyze documents	2.50			
5/23	Add FTP files to index.		2.00		
5/25	Review and analyze documents	2.00			
5/25	Review and analyze bank statements.			8.00	
5/26	Review and analyze documents	2.00			
5/26	Review and analyze bank statements.			6.50	
5/26	Review and analyze bank statements.			1.50	
5/30	Review and analyze bank statements.			7.75	
5/30	Review and evaluate bank statements				7.00
5/31	Review and analyze bank statements.			7.50	
	Total	18.00	9.25	50.25	7.00



****Resubmission****

June 16, 2017

May 1, 2017
to
May 31, 2017

Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

THO-01-60-01-01 - 6/16

REMITTANCE COPY

*****PLEASE RETURN WITH PAYMENT*****

Remitted By:

Jennifer R. Ecklund, Esq.
Thompson & Knight LLP
One Arts Plaza
1722 Routh Street, Suite 1500
Dallas, Texas 75201

Current Invoice Total:

\$ 17,665.75

Please make check payable to:

Veritas Advisory Group, Inc.

Mailing address:

Veritas Advisory Group, Inc.
1601 Elm Street, Suite 3600
Dallas, Texas 75201



July 17, 2017

Jennifer R. Ecklund, Esq.
 Thompson & Knight LLP
 One Arts Plaza
 1722 Routh Street, Suite 1500
 Dallas, Texas 75201

Re: Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

Professional fees and expenses in connection with the above-referenced matter for the period of June 1, 2017 through June 30, 2017:

Professional Fees:

<u>Name</u>	<u>Staff Level</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Brandi N. Kleinman	Vice President	47.50 hrs.	@ \$325	\$ 15,437.50
Brian L. Ingram	Senior Manager	20.25 hrs.	@ \$248	\$ 5,022.00
Paul A. Forbes	Associate Consultant	151.75 hrs.	@ \$175	\$ 26,556.25
Matthew B. Dunn	Associate Consultant	134.75 hrs.	@ \$175	\$ 23,581.25
Claire Sowards	Analyst	27.50 hrs.	@ \$104	\$ 2,860.00
Total Professional Fees				\$ 73,457.00

Out-of-Pocket Expenses:

Miscellaneous	\$ 10.64
Total Out-of-Pocket Expenses	\$ 10.64

Total Professional Fees and Out-of-Pocket Expenses* **\$ 73,467.64**

*As of the date of this invoice, the outstanding balance of prior invoices is \$17,665.75.



Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

Description of Activities for Task Code F170 Forensic Accounting
(June 1, 2017 through June 30, 2017)

Date	Activity	Kleinman	Ingram	Forbes	Dunn	Sowards
6/1	Review and analyze bank statements.			8.00		
6/1	Review and analyze bank statements.					7.50
6/2	Review and analyze bank statements.			4.00		
6/2	Review and analyze bank statements.					6.50
6/5	Review and analyze Bank Statements	2.00				
6/5	Review and analyze bank statements.			6.25		
6/5	Summarize Remodel and improvements to Bryant residence				4.25	
6/6	Review and analyze Bank Statements	2.00				
6/6	Review and analyze bank statements.			4.50		
6/6	Compile Individual Investor Data				7.50	
6/7	Review and analyze Bank Statements	1.00				
6/7	Review and analyze bank statements.	2.00				
6/7	Review and analyze bank statements.			7.75		
6/7	Compile Individual Investor Data				8.00	
6/7	Summarize transfers between accounts					6.50
6/8	Preparation for and meeting with Counsel	2.00				
6/8	Organize electronic documents and review for OCR ability.		3.50			
6/8	Review and analyze bank statements.			7.00		
6/8	Meeting with counsel.			1.50		
6/8	Compile Individual Investor Data				5.50	
6/8	Prepare 2017 investor summary				2.50	
6/8	Summarize transfers between accounts					2.50
6/9	Review and analyze Bank Statements	1.00				
6/9	Organize electronic documents and review for OCR ability.		4.50			
6/9	Review and analyze bank statements.			7.00		
6/9	Prepare 2017 investor summary				1.00	
6/9	Compile Individual Investor Data				5.25	
6/9	Summarize transfers between accounts					4.50
6/10	Organize electronic documents and review for OCR ability.		1.25			
6/12	Preparation for and call with Counsel	2.00				
6/12	Download and review outside OCR.		1.25			
6/12	Convert 2800 pages of PDFs to spreadsheets.		7.50			
6/12	Review and analyze bank statements.			8.00		
6/12	Compile Investor Statements				7.75	
6/13	Review and analyze BUCF and Wammell Financial Data; Prepare summary	2.50				
6/13	Review and analyze bank statements.			7.00		
6/13	Call with counsel.			0.75		
6/13	Compile Investor Statements				7.50	
6/13	Meeting with Counsel				0.75	
6/14	Review and analyze BUCF and Wammell Financial Data; Prepare summary	2.00				
6/14	Compile OCR database.			7.50		
6/14	Compile OCR Financial document database				8.00	
6/15	Compile OCR database.			8.00		
6/15	Compile OCR Financial document database				6.00	



Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

Description of Activities for Task Code F170 Forensic Accounting
(June 1, 2017 through June 30, 2017)

Date	Activity	Kleinman	Ingram	Forbes	Dunn	Sowards
6/16	Review and analyze BUCF and Wammell Financial Data; Prepare summary	2.00				
6/16	Compile OCR database.			7.50		
6/16	Compile OCR Financial document database				0.50	
6/16	Compile OCR Financial document database				7.50	
6/19	Review and analyze Wammell Account transfers and financial records	4.00				
6/19	Compile OCR Financial document database				3.00	
6/19	Compile, sort, and analyze Investor Funds				6.00	
6/20	Download and compare docs to existing docs.		2.25			
6/20	Review and analyze bank account statements.			7.50		
6/20	Compile, sort, and analyze Investor Funds				7.75	
6/21	Review and analyze Wammell Account transfers and financial records	3.00				
6/21	Review and analyze investor data.			7.25		
6/21	Compile, sort, and analyze Investor Funds				7.50	
6/22	Review and analyze Wammell Account transfers and financial records	3.00				
6/22	Review and analyze investor data.			6.50		
6/22	Compile, sort, and analyze Investor Funds				7.50	
6/23	Review and analyze Wammell Account transfers and financial records	3.00				
6/23	Prepare Wammell Exhibits			7.50		
6/23	Compile, sort, and analyze Investor Funds				2.50	
6/23	Compile, sort, and analyze Investor Funds				6.00	
6/26	Prepare Wammell Exhibits	4.00				
6/26	Prepare Wammell Exhibits			8.00		
6/26	Analyze and Compile Investor funds transferred to Wammell				7.50	
6/27	Prepare Wammell Exhibits			8.00		
6/27	Analyze and Compile Investor funds transferred to Wammell				7.00	
6/28	Prepare Wammell Exhibits	4.00				
6/28	Prepare Wammell Exhibits			8.00		
6/28	Analyze and Compile Investor funds transferred to Wammell				6.00	
6/29	Prepare Wammell Exhibits	4.00				
6/29	Prepare Wammell Exhibits			7.25		
6/29	Analyze and Compile Investor funds transferred to Wammell				2.00	
6/30	Prepare Wammell Exhibits	4.00				
6/30	Prepare Wammell Exhibits			7.00		
	Total	47.50	20.25	151.75	134.75	27.50



Securities Exchange Commission v. Bryant United Capital Funding, Inc., et al.

Description of Expenses
(June 1, 2017 through June 30, 2017)

	<u>Amount</u>
<i>Miscellaneous:</i>	
6/9/2017 Special Delivery Courier to K. Clark	\$ <u>10.64</u>
Subtotal Miscellaneous:	\$ <u>10.64</u>
Total Out-of-Pocket Expenses	\$ 10.64