

**UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

V.

KEVIN TRUDEAU,

Defendant.

Case No.: 03-C-3904

Hon. Robert W. Gettleman

RECEIVER'S MOTION FOR AN ORDER (A) APPROVING FINAL ACCOUNTING; (B) AUTHORIZING FINAL DISTRIBUTION TO FTC; (C) ASSIGNING FUTURE ROYALTY PAYMENTS TO FTC; (D) AUTHORIZING ABANDONMENT AND DESTRUCTION OF RECORDS; (E) DISCHARGING RECEIVER; AND (F) GRANTING RELATED RELIEF

Robb Evans & Associates LLC, in its capacity as the court-appointed receiver for the assets of Kevin Trudeau and the Trudeau Entities et al. (the “Receiver”), by and through its undersigned counsel, moves for entry of an order (the “Motion”) granting it certain relief in connection with the final wind up of the receivership estate.

OVERVIEW

Having discharged its obligations under the Receivership Order through the activities detailed to the Court in the Receiver's various periodic reports, the Receiver now seeks to wind up the receivership estate. To that end, as detailed below, the Receiver seeks approval of a final distribution to the FTC of remaining receivership funds net of administrative expenses, including professional fees. Together with the previous interim distribution to the FTC, the Receiver anticipates payment to the FTC will total \$8,195,407.66. In addition to the distribution of funds, the Receiver also requests the Court assign the receivership estate's interest in certain future royalty payments to the FTC. Further, the Receiver seeks authority to destroy business records

of the receivership entities presently in the Receiver's possession. Finally, the Receiver requests the Court approve its final report and accounting, approve on a final basis payment of all receiver's fees and expenses, including those of its professionals, and discharge the Receiver.

BACKGROUND

A. OVERVIEW OF RECEIVERSHIP AND FINAL ACCOUNTING

On June 2, 2010, as a sanction for his contempt of the Court's 2004 injunction, the Court ordered Defendant Kevin Trudeau ("Trudeau") to pay the FTC \$37,616,161 corresponding to the consumer loss resulting from Trudeau's "contumacious and deceptive infomercial marketing of the *Weight Loss Cures* book" (the "Order to Pay"). (Order [Dkt. #372].) Following extensive discovery and an evidentiary hearing, on July 26, 2013, the Court held Trudeau in contempt of the Order to Pay. (7/26/2013 Order [Dkt. #729].) The Court further found that Trudeau had created and controlled a number of domestic and offshore entities, including through figureheads such as his wife Natalia Babenko and Trudeau's longtime business associate Neil Sant. (*See* FTC Findings § II.A & B [Dkt. #713].)¹ Having found Trudeau in contempt, the Court directed the FTC to propose a receiver to assume control of both Trudeau's assets and all entities controlled by Trudeau. (7/26/2013 Order dated [Dkt. #729].) ¶ 2.) The Court ordered that "[t]he Receiver shall marshal and hold such assets for the purpose of paying to the FTC the sum ordered by the court on June 2, 2010 [i.e. \$37,616,161]." (*Id.*)

By order dated August 7, 2013 (the "Receivership Order"), the Court appointed Robb Evans & Associates LLC as the receiver over "Trudeau's Assets" and the "Trudeau Entities" (as

¹ After "thoroughly review[ing] and confirm[ing] the accuracy of the FTC's proposed findings of fact and conclusions of law," the Court adopted Findings II through VI and Conclusions I through IV of those proposed findings. (7/26/2013 Order at ¶ (2) [Dkt. #729].)

those terms are defined in the Receivership Order).² (Receivership Order § IV [Dkt. #742].) In the Receivership Order, the Court again directed the Receiver to marshal and hold the receivership assets for the purpose of paying to the FTC the more than \$37 million contempt sanction. (Receivership Order §V(1) [Dkt. 742].) The Court also directed the Receiver not to pay any pre-receivership debt incurred by Trudeau or any of the Trudeau Entities without the Court's prior approval, except as necessary to secure receivership assets. (*Id.* §V(7).)

Upon its appointment, the Receiver immediately began identifying and assuming control of receivership assets. The Receiver has previously reported its activities to the Court, including in each of its applications for fees and expenses. Concurrently with this motion, the Receiver is filing its Fifth Motion for Approval of Fees and Expenses and Status Report detailing the Receiver's activities during the period March 31, 2015, through October 31, 2015. Attached as Exhibit A to this Motion is the Receiver's final Administrative Expenses and Fund Balance report (the "Final Accounting"), which includes the fees and expenses sought in the Fifth Fee Motion and additionally estimates income and closing costs through the wind up of the receivership.

B. FINAL DISTRIBUTION TO THE FTC.

As reflected in its Final Accounting, the Receiver collected gross funds totaling \$15,055,751.40 during the receivership, including approximately \$2 million previously placed

² The Receivership Order expressly designates the following 29 entities to be included as "Trudeau Entities": 0913372 B.C. Ltd.; 0913376 B.C. Ltd.; Advantage Solutions Ltd; Alliance Publishing Group, Inc.; APC Trading Limited; Direct Response Associates, LLC; GIN USA Inc.; Global Information Network FDN; Global Sales Solutions A.G., International Pool Tour Inc.; K.T. Corporation Limited; KMT Fiduciary Trust; KT Capital Corporation; KT Radio Network Inc.; Natural Cures, Inc.; Natural Cures Health Institute; Natural Cures Holdings Inc.; NBT Trading Limited; N.T. Trading S.A.; Pool Licensing LLC; Sovereign Trust; The Whistle Blower, Inc.; TRUCOM, L.L.C.; Trudeau Approved Products Inc.; Trudeau Management Inc.; TruStar Marketing Corporation; Trustar Productions, Incorporated; Website Solutions Switzerland GmbH; and Website Solutions USA Inc.

into escrow by Trudeau pursuant to Court order. Excluding distributions to the FTC, the receivership estate incurred total expenses of \$6,860,343.74, including nearly \$4 million in operating expenses associated with the Trudeau Entities. Accordingly, the Receiver anticipates distributing total net funds of \$8,195,407.66, including prior interim distributions, to the FTC leaving no funds in the receivership estate.

Recognizing that the anticipated proceeds from the receivership would be grossly insufficient to pay the more than \$37 million judgment in favor of the FTC, the Receiver obtained court approval to provide notice to all creditors that the Receiver intended to distribute all net proceeds of the estate to the FTC without any further notice to creditors. (Receiver's Motion to Approve [Dkt. #898] & Order [Dkt. #902].) In approving the Receiver's proposed procedures for providing such notice, the Court afforded creditors the opportunity to object to the Receiver's plan in writing. Former counsel to Neil Sant and Website Solutions USA (the "Objecting Counsel") filed an objection and supporting reply brief seeking, among other things, to have pre-receivership legal fees incurred while representing Sant and Website Solutions treated as administrative expenses. (*See* Obj. [Dkt. #912] and Reply [Dkt. #916].) Additionally, a handful of former GIN members submitted informal letter objections. (*See* Letter Objections [Dkt # 907, 970 & 911].) On October 7, 2015, the Court overruled all objections to the Receiver's plan to distribute all net receivership proceeds to the FTC.³ (Order dated 10/7/2015 [Dkt. #917].) Concurrently, the Court approved the FTC's proposed redress plan. (*Id.*) On November 4, 2015, and without any objection, the Court granted the Receiver's motion to make a \$4 million interim distribution to the FTC in order to facilitate the immediate implementation

³ Objecting Counsel are appealing the Court's overruling of their objection.

of the FTC's redress plan. (Order [Dkt. #925].) The Receiver distributed such funds by wire transfer to the FTC on November 6, 2015.

C. ASSIGNMENT OF FUTURE ROYALTY PAYMENTS TO FTC.

Among the assets administered by the Receiver, the Receiver has been collecting certain royalty and related payments due under agreements entered into by certain Receivership Entities, including (a) the Spokesperson/Host/Author Agreement dated January 10, 2009, entered into by and between Free Is My Favorite, LLC and Trustar Productions, Inc. for services of Kevin Trudeau; (b) the License Agreement dated November 2012 entered into by and between Natural Press, LLC on the one hand, and Natural Cures Holdings Inc. and Kevin Trudeau on the other hand; and (c) the Services and License Agreement dated May 2, 2007, entered into by and between Maxxed Out, LLC and Trustar Productions, Inc. for services of Kevin Trudeau (collectively, the "Outstanding Licensing Agreements"). The Receiver has reported the revenue received on account of the Outstanding Licensing Agreements in the Administrative Expenses and Fund Balance Report under the line item "Copyright Royalties." (*See* Ex. 1 at 2.) For the period April 1, 2015, through October 15, 2015, the Receiver collected \$9,004.90 in such payments. The value of such payments varies depending on, among other things, underlying sales from infomercials. As such, the Receiver cannot speculate as to the future value of such payments.

In order to relieve the Receiver of the costs of administering these relatively small monthly payments and to allow the receivership estate to close, the Receiver requests the Court enter an order assigning, transferring and conveying to the FTC all of the Receiver's rights, claims and interests under the Outstanding Licensing Agreements and direct any payments due under such agreements to be paid directly to the FTC. The Receiver has provided a copy of this

Motion on the licensees under the Outstanding Licensing Agreements and to The Goodman Group LLC, who is the servicer administering the royalty payments.

D. DISPOSAL OF RECEIVERSHIP RECORDS

As a part of assuming control of the Receivership Entities, the Receiver took possession of those entities' business records, including approximately 200 oversized banker boxes and 29 conventional banker boxes now located at the Receiver's offices. Nearly all of the records were originally stored at the Trudeau Entities' Westmont, Illinois offices. While the records are generally maintained in the form in which they were stored, the Receiver does not have an inventory or other index of such records. The Receiver has contacted the FTC and counsel for Trudeau to inquire whether either party wanted to assume custody of such records. Counsel for Trudeau advised that Mr. Trudeau does not need the records turned over to him and the FTC similarly declined to assume possession of such records. To avoid the open-ended cost of storing these records for an indeterminate amount of time, the Receiver now seeks authority to abandon such records and arrange for their proper destruction.

E. TERMINATION OF THE RECEIVERSHIP

Upon completing the forgoing activities, the Receiver believes that it will have fully discharged all of its obligations and duties provided for in the Receivership Order. Accordingly, the Receiver requests the Court approve the Receiver's activities taken with respect to the administration of the receivership as proper and in the best interests of the receivership estate, and discharging and releasing the Receiver and its professionals.

WHEREFORE, the Receiver requests the Court enter an order granting the following relief:

- (a) Accepting and approving the Receiver's Final Accounting as attached to this Motion;
- (b) Approving and confirming all actions and activities undertaken by or on behalf of the Receiver in connection with the administration of the receivership estate;
- (c) Providing final approval of all receivership administrative expenses, including the Receiver's fees and expenses and those of its professionals, incurred in connection with the receivership proceeding, and directing the Receiver to pay any unpaid administrative expenses, including professional fees and expenses and closing costs as allowed by the Court;
- (d) Directing and authorizing the Receiver to pay the Federal Trade Commission or its agent on account of the June 2, 2010 Order to Pay all remaining funds in the receivership estate, net of any unpaid fees and expenses, including professional fees and expenses and closing expenses as allowed by the Court;
- (e) Authorizing the Receiver to wind up and close the receivership estate without the Receiver providing further notice to creditors, implementing a distribution to creditors or a claims procedure pertaining to the receivership estate, and without payment of pre-receivership claims;
- (f) Assigning, transferring and conveying to the FTC all of the Receiver's rights, claims and interests under the Outstanding Licensing Agreements and direct any payments due under such agreements to be paid directly to the FTC;
- (g) Authorizing the Receiver to abandon records of the Receivership Entities and destroy all such records; and
- (h) Discharging the Receiver, its agents, employees, members, officers, independent contractors, attorneys and representatives (collectively, the "Receiver Personnel"), and relieving

the Receiver Personnel of all duties, liabilities and responsibilities pertaining to the receivership previously established in this action effective upon the wind up of the receivership estate, payment of administrative expenses and final distribution of funds as ordered by the Court to be effective upon completion of all activities ordered by the Court in connection with this Motion.

Dated: December 21, 2015

Respectfully submitted,

**ROBB EVANS & ASSOCIATES LLC,
RECEIVER**

By: /s/ Blair R. Zanzig

(One of Its Attorneys)

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*Counsel for Robb Evans & Associates LLC, in
its capacity as Receiver*

EXHIBIT A

ROBB EVANS & ASSOCIATES LLC
 The Assets of Kevin Trudeau, the Trudeau Entities, et al.
Administrative Expenses and Fund Balance
 From Inception (August 7, 2013) to October 31, 2015 and Estimate to Close

	Previously Reported and Approved	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	4/1/15~ 10/31/15	Estimate to Close	TOTAL
Trudeau Escrow Account Funds	0.00	0.00	0.00	0.00	0.00	2,000,239.53	0.00	0.00	2,000,239.53	0.00	2,000,239.53
Proceeds from Sale of Assets											
IL Residence Auction Proceeds	0.00	50,176.00	0.00	0.00	0.00	5,880.00	0.00	0.00	56,056.00	0.00	56,056.00
Sale of 601 Del Oro Ojai, CA	89,434.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	89,434.49
Sale of GIN	416,006.40	18,952.40	18,136.40	17,259.20	0.00	0.00	0.00	0.00	54,348.00	0.00	470,354.40
Sale of Natural Cures Inventory	65,000.00	5,000.00	0.00	0.00	0.00	0.00	0.00	0.00	5,000.00	0.00	70,000.00
K. Trudeau Personal Property	71,429.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	71,429.75
Total Proceeds from Sale of Assets	641,870.64	74,128.40	18,136.40	17,259.20	0.00	5,880.00	0.00	0.00	115,404.00	0.00	757,274.64
Corporate Account Funds											
Alder & Alder LLC	628.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	628.63
Banco Popular	20,582.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20,582.27
Brandy Burkhardt	5,307.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,307.50
Debra A. Buettner P.C.	10,664.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,664.50
Debt Cures, LLC	597.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	597.55
Global Information Network	225,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	225,000.00
Global Info Network Foundation	263,803.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	263,803.76
GIN FDN Event Account	1,435,373.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,435,373.80
Hellbenders/Tristar Prod.	3,990.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,990.55
I-Payout Systems Inc.	2,687.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,687.11
K.T. Corporation Limited	2,617.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,617.02
K.T. Radio Network Inc.	9,133.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,133.35
Marc J. Lane Wealth Group	18,846.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18,846.41
Mary Patricia Benz Atty at Law	4,050.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,050.00
Migros Bank	4,153.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,153.97
Natural Cures Health Insurance	50,304.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	50,304.26
Natural Cures Inc.	151,844.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	151,844.75
NBX Reserve Funds	1,499,985.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,499,985.46
Northern Trust	218.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	218.24
Park Federal Savings Bank	13,657.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13,657.54
Pershing LLC	380.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	380.73
St. George Bank LTD	9,886.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,886.02
The Gordon Law Group LTD	11,335.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11,335.50
Tru-Com LLC	804.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	804.01
Trudeau Approved Products	151,777.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	151,777.95
Tristar Productions Inc.	1,376.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,376.72
Website Solutions USA	422,249.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	422,249.48
William Hill Online Account	82,684.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	82,684.72
Total Corporate Account Funds	4,403,941.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,403,941.80

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	Previously Reported and Approved	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	4/1/15~ 10/31/15	Estimate to Close	TOTAL
Incoming Receipts											
Global Information Network											
Receiver Account											
Copyright Royalties	129,356.00	726.00	2,139.95	2,059.53	996.11	1,411.93	569.05	1,102.33	9,004.90	423.24	138,784.14
Event Commissions	11,024.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11,024.75
Membership Dues & Upgrades-Chl	85,603.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	85,603.82
Membership Dues & Upgrades - C	7,479,552.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,479,552.17
Total Receiver Account	7,705,536.74	726.00	2,139.95	2,059.53	996.11	1,411.93	569.05	1,102.33	9,004.90	423.24	7,714,964.88
Non-Receiver Account											
Remote Deposit	13,261.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13,261.15
Total Non-Receiver Account	13,261.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13,261.15
Total Global Information Network	7,718,797.89	726.00	2,139.95	2,059.53	996.11	1,411.93	569.05	1,102.33	9,004.90	423.24	7,728,226.03
Trudeau Approved Products	84,384.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	84,384.97
GIN FDN Event Registration	24,082.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24,082.25
Sale of Inventory Stock	40,579.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	40,579.60
Total Incoming Receipts	7,867,844.71	726.00	2,139.95	2,059.53	996.11	1,411.93	569.05	1,102.33	9,004.90	423.24	7,877,272.85
Interest Income	2,078.23	154.47	160.17	155.06	158.23	171.61	208.76	215.76	1,224.06	0.00	3,302.29
Miscellaneous Income											
MetLife	18.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.00
Refunds	1,501.40	0.00	0.00	0.00	0.00	0.00	0.00	2,121.62	2,121.62	0.00	3,623.02
Tax Refunds	4,120.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,120.28
Utility Account Refunds	4,523.94	0.00	0.00	0.00	0.00	26.64	0.00	0.00	26.64	0.00	4,550.58
Other	1,193.06	0.00	0.00	0.00	0.00	215.35	0.00	0.00	215.35	0.00	1,408.41
Total Miscellaneous Income	11,356.68	0.00	0.00	0.00	0.00	241.99	0.00	2,121.62	2,363.61	0.00	13,720.29
Total Funds Collected	12,927,092.06	75,008.87	20,436.52	19,473.79	1,154.34	2,007,945.06	777.81	3,439.71	2,128,236.10	423.24	15,055,751.40
Expenses											
Distribution to FTC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,195,407.66	8,195,407.66
Oak Brook, IL Residence											
Personal Property Auction Costs	0.00	1,224.00	0.00	0.00	0.00	0.00	0.00	0.00	1,224.00	0.00	1,224.00
Casualty & Liability Insurance	960.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	960.03
Total Oak Brook, IL Residence	960.03	1,224.00	0.00	0.00	0.00	0.00	0.00	0.00	1,224.00	0.00	2,184.03
GIN FDN Event Expenses											
Cellular & Communications	1,327.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,327.41
Toronto Oct. 2013	5,365.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,365.50
PowerUp! Los Angeles	27,921.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27,921.97
Power Up Paris!	23,173.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	23,173.38
Level 6 Training & 5 Exams	4,984.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,984.14
Leadership Round Table Mtg	6,978.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,978.20
Power Up! Chicago 2/22/14	18,090.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18,090.31

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	Previously Reported and Approved	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	4/1/15~ 10/31/15	Estimate to Close	TOTAL
Bank Fees	741.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	741.57
Authnet Gateway Fees	477.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	477.95
Credit Card Discounts	2,559.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,559.38
Credit Card Fees	892.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	892.47
Event Management Expenses	20,349.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20,349.99
Event Management Fees	450,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	450,000.00
Gift Cards	215.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	215.35
GIN Family Reunion Event Exp	602,704.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	602,704.69
Recording/Production Costs	73.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	73.16
Speaker Fees	1,258.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,258.00
Speaker Gifts	21.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.44
Ticket Sales Commissions	710.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	710.50
Travel Expenses	5,486.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,486.95
Total GIN FDN Event Expenses	1,173,332.36	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,173,332.36
Business Operation Expenses											
Alarm & Security	315.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	315.00
Bank Fees	468.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	468.58
Cellular Services	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Colocation Server Services	51,450.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	51,450.00
Communication Consulting	37,152.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	37,152.00
Contest Winner Vehicle Lease	43,500.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	43,500.00
Corporate Insurance Premiums	26,084.44	3,926.00	0.00	0.00	0.00	0.00	0.00	0.00	3,926.00	0.00	30,010.44
Credit Card Discounts & Fees	602,262.03	29.95	0.00	0.00	0.00	0.00	0.00	0.00	29.95	0.00	602,291.98
Document Destruction Services	641.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	641.01
Domain License	2,300.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,300.00
Electricity	12,698.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12,698.34
Employer Payroll Taxes	117,936.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	117,936.84
Equipment Rental	2,157.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,157.18
Exigo Services	114,223.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	114,223.92
G.I.N. Commission Payments	749,171.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	749,171.40
Health Insurance & Benefits	339,454.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	339,454.32
Independant Contractor Fees	125,832.22	2,262.71	3,035.24	1,780.36	0.00	0.00	0.00	0.00	7,078.31	0.00	132,910.53
Intercompany Payroll Allocation	7,200.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,200.00
Inventory Disposal/Shredding	565.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	565.00
Inventory Storage	18,982.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18,982.51
Janitorial Services	10,885.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10,885.00
Locksmith Services	251.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	251.90
Meals & Entertainment	8,237.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8,237.23
Member/Affiliate Communications	5,040.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,040.00
Moving/Packing Services	372.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	372.04
Music License Fees	150.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	150.00
Natural Gas	11,121.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11,121.50
Office Rent	204,750.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	204,750.98
Office Sublease Commission	1,996.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,996.43
Office Supplies	4,105.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,105.45
Payroll Expenses	1,306,226.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,306,226.48
Payroll Processing Fees	5,885.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,885.02
Penalties & Interest	131.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	131.28

ROBB EVANS & ASSOCIATES LLC
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	Previously Reported and Approved	Apr 15	May 15	Jun 15	Jul 15	Aug 15	Sep 15	Oct 15	4/1/15~ 10/31/15	Estimate to Close	TOTAL
Phone & Internet Services	31,746.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31,746.66
PO Box Rent	888.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	888.00
Postage & Delivery	7,786.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,786.52
Prior Period CC Return	450.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	450.00
Promotional Expenses	5,509.86	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,509.86
Sales & Use Taxes	2,013.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,013.72
Security Services	960.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	960.00
Shipping & Packaging	19,979.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	19,979.51
Software Support Service	25,268.34	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	25,268.34
Storage Unit Rent	6,706.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,706.00
Transportation Services	772.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	772.59
Unspecified Business Expenses	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
UPC/Trademark Registrations Fee	206.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	206.91
Worker Compensation Insurance	3,359.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,359.25
Website Services	18,132.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18,132.17
Total Business Operation Expenses	3,935,327.63	6,218.66	3,035.24	1,780.36	0.00	0.00	0.00	0.00	11,034.26	0.00	3,946,361.89
Ojai, CA Residential Property	22,856.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22,856.83
Payment to Winston & Strwan LLP	33,128.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	33,128.28
Kevin Trudeau Living Expense	9,352.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,352.00
Receiver Fees & Expenses											
Receiver Fees											
Receiver											
R. Evans	841.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	841.50
B. Kane	81,073.35	7,597.80	3,467.25	10,642.95	1,085.40	150.75	150.75	391.95	23,486.85	6,030.00	110,590.20
K. Johnson	123,042.15	603.00	0.00	90.45	0.00	0.00	0.00	0.00	693.45	0.00	123,735.60
V. Miller	186,357.15	603.00	0.00	2,050.20	60.30	0.00	0.00	331.65	3,045.15	1,507.50	190,909.80
A. Jen	109,293.75	5,668.20	211.05	1,386.90	693.45	482.40	180.90	60.30	8,683.20	9,045.00	127,021.95
Total Receiver	500,607.90	14,472.00	3,678.30	14,170.50	1,839.15	633.15	331.65	783.90	35,908.65	16,582.50	553,099.05
Senior Staff											
L. Lee	37,748.30	271.35	90.45	0.00	0.00	0.00	0.00	0.00	361.80	0.00	38,110.10
T. Chung	170,468.10	16,763.40	11,276.10	28,280.70	4,462.20	542.70	0.00	0.00	61,325.10	0.00	231,793.20
F. Jen	159,674.40	3,045.15	0.00	7,688.25	90.45	482.40	150.75	60.30	11,517.30	1,507.50	172,699.20
C. Callahan	20,160.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	20,160.00
E. Roop	19,210.50	0.00	0.00	0.00	823.50	1,701.00	0.00	0.00	2,524.50	0.00	21,735.00
C. DeCius	54,846.00	603.00	198.00	225.00	648.00	117.00	126.00	99.00	2,016.00	1,800.00	58,662.00
N. Wolf	138.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	138.00
J. Dadbin	15,257.00	544.50	5.50	0.00	0.00	55.00	0.00	0.00	605.00	0.00	15,862.00
Total Senior Staff	477,502.30	21,227.40	11,570.05	36,193.95	6,024.15	2,898.10	276.75	159.30	78,349.70	3,307.50	559,159.50
Support Staff	14,108.40	51.20	42.40	85.00	141.00	231.00	210.60	37.20	798.40	750.00	15,656.80
Total Receiver Fees	992,218.60	35,750.60	15,290.75	50,449.45	8,004.30	3,762.25	819.00	980.40	115,056.75	20,640.00	1,127,915.35
Receiver Expenses											
Bank Fees	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Investigative Search Costs	34,598.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	34,598.76
Occupancy & Storage	2,541.67	290.00	0.00	145.00	145.00	145.00	290.00	0.00	1,015.00	435.00	3,991.67
Office Telephone & Supplies	1,852.36	0.00	2.64	0.00	0.00	0.00	0.00	0.00	2.64	20.00	1,875.00
Postage & Delivery	7,043.95	3.11	1.44	4.51	0.49	423.96	159.15	0.49	593.15	135.00	7,772.10

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Record Destruction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,000.00	3,000.00
Subpoena/Document Reproduction	9,712.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9,712.37
Tax Return Preparation Fees	20,962.85	0.00	0.00	0.00	0.00	0.00	0.00	32,074.54	32,074.54	30,000.00	83,037.39
Travel Expenses	31,168.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	31,168.11
Website Support	887.21	0.00	0.00	0.00	115.34	168.56	0.00	0.00	283.90	133.08	1,304.19
Total Receiver Expenses	108,767.28	293.11	4.08	149.51	260.83	737.52	449.15	32,075.03	33,969.23	33,723.08	176,459.59
Legal Fees & Costs											
Dentons US LLP											
Legal Fees	18,912.15	59.40	0.00	22,631.40	59.40	0.00	0.00	0.00	22,750.20	0.00	41,662.35
Legal Costs	39.69	0.00	0.00	39.15	0.00	0.00	0.00	0.00	39.15	0.00	78.84
Total Dentons US LLP	18,951.84	59.40	0.00	22,670.55	59.40	0.00	0.00	0.00	22,789.35	0.00	41,741.19
Hiltz & Zanzig											
Legal Fees	227,232.00	0.00	0.00	0.00	0.00	0.00	0.00	70,236.00	70,236.00	14,520.00	311,988.00
Legal Costs	3,076.57	0.00	0.00	0.00	0.00	0.00	0.00	1,464.66	1,464.66	100.00	4,641.23
Total Hiltz & Zanzig	230,308.57	0.00	0.00	0.00	0.00	0.00	0.00	71,700.66	71,700.66	14,620.00	316,629.23
Holzhacker											
Legal Fees	7,783.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,783.20
Legal Costs	11.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11.84
Total Holzhacker	7,795.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,795.04
Meridian Lawyers											
Legal Fees	2,130.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,130.95
Legal Costs	457.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	457.00
Total Meridian Lawyers	2,587.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,587.95
Total Legal Fees & Costs	259,643.40	59.40	0.00	22,670.55	59.40	0.00	0.00	71,700.66	94,490.01	14,620.00	368,753.41
Total Receiver Fees & Expenses	1,360,629.28	36,103.11	15,294.83	73,269.51	8,324.53	4,499.77	1,268.15	104,756.09	243,515.99	68,983.08	1,673,128.35
Total Expenses	6,535,586.41	43,545.77	18,330.07	75,049.87	8,324.53	4,499.77	1,268.15	104,756.09	255,774.25	8,264,390.74	15,055,751.40
Net Transactions		31,463.10	2,106.45	(55,576.08)	(7,170.19)	2,003,445.29	(490.34)	(101,316.38)	1,872,461.85	(8,263,967.50)	
Fund Balance	6,391,505.65										0.00