

**Exhibit A-2**



# PALTER • STOKLEY • SIMS

A Professional Limited Liability Company

8115 Preston Road, Suite 600, Dallas, TX 75225

214-888-3120 (Phone) / 214-888-3109 (Fax)

TAX ID# 46-1734174

W Craig Stokley, Receiver  
Palter Stokley Sims PLLC  
8115 Preston Road, Suite 600  
Dallas, TX 75225

April 30, 2017

Matter Number: HCHR01-00

Invoice Number: 006473

Regarding: HCH Receivership\General

***Professional services rendered:***

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
4/03/2017	WCS	Attention to inquiry from Patrick Howard's counsel.	0.20	\$325.00	\$65.00
4/04/2017	WCS	Attention to investor inquiries. Review outstanding items to be accomplished. Attention to WHRZT's failure to make payment and options regarding same.	1.50	\$325.00	\$487.50
4/05/2017	KTDT	Check bank balance. Update QuickBooks register. Prepare spreadsheet of Chase bank fees and record refund for account 9918. Prepare Chase bank check for signature and deposit.	0.60	\$125.00	\$75.00
4/05/2017	WCS	Attention to scheduling car return with counsel or Patrick Howard.	0.20	\$325.00	\$65.00
4/06/2017	WCS	Attention to inquiry from SEC regarding investor inquiries. Confer with Phillip Hess an investor. Respond to investor inquiries. Confer with Andrea Venezio.	1.60	\$325.00	\$520.00
4/10/2017	KJS	Review and analysis of correspondence to investors by alleged investor committee. Analysis of communication between Howard and investors and response to same. Preparation and revision of correspondence to investors. Review of receiver website related to information to investors.	0.80	\$300.00	\$240.00

4/10/2017	KTDT	Check bank and update QuickBooks register. Review invoices and A/R report. Issue check payment for Galaxy Global Logistics.	0.50	\$125.00	\$62.50
4/10/2017	WCS	Review correspondence from oecaptialpartnersinvestors@gmail.com. Consider option for responding to same. Draft notice letters to former employees involved in same. Review correspondence from investors. Send correspondence regarding return of Patrick Howard's lease vehicle. Revise and edit letter to investors. Follow up with movers. Attention to canceling event at the W Hotel.	6.00	\$325.00	\$1,950.00
4/11/2017	KJS	Review and analysis of investor email contacts, and attention to transmittal of email to investors regarding receivership. Preparation of correspondence to Patrick Howard regarding violation of Orders. Preparation of correspondence to Doville Sobrinskas regarding violation of orders. Preparation of correspondence to Ron Sherer regarding violation of orders. Preparation of correspondence to Christine Horne regarding violation of orders. Preparation of correspondence to Chad Alberson regarding violation of orders. Preparation of Notice of violations to Court and SEC. Begin preparation of motion to require show cause hearing based on violations. Analysis of correspondence from Howard's counsel regarding violations. Review and analysis of correspondence from Doville regarding same. Review of correspondence related to call with investors. Confer with Receiver regarding course of action in response to violations of orders.	3.50	\$300.00	\$1,050.00
4/11/2017	WCS	Attention to oecaptialpartnersinvestors@gmail.com email address and correspondence coming from this email address. Investigate source and options related to same. Confer with investors regarding same. Correspond regarding same. Send notices of violations. Correspond with Joe Paterno regarding storage issues. Finalize and send correspondence to investors. Confer with counsel for C4 regarding fraudulent emails sent by former employees. Attention to correspondence from counsel for Patrick Howard.	5.50	\$325.00	\$1,787.50

4/12/2017	KJS	Review and analysis of investor communications related to OE Capital former employees' correspondence and calls with investors. Preparation of correspondence in response to investors. Preparation of updated information on receiver website related to judgments entered. Analysis of request for former employees to show cause as to violation of orders. Attention to notice to Court regarding violation of Orders. Preparation of correspondence to hotel making demand for return of deposit paid by OE.	0.80	\$300.00	\$240.00
4/12/2017	KJS	Review of correspondence from counsel for Howard, and preparation of response to counsel regarding violations of orders. Review of correspondence regarding counsel engaged by Doville. Attention to preparation of additional notice letters to former employees violating orders. Review and analysis of correspondence regarding meeting of investors and additional communication received.	0.70	\$300.00	\$210.00
4/12/2017	KTDT	Review correspondence regarding payment and send copy of check payable to Galaxy Global Logistics.	0.10	\$125.00	\$12.50
4/12/2017	WCS	Attention to information from investors related to former employees efforts to further defraud them. Prepare notices and letter regarding same. Review and analyze options regarding same. Correspond and confer with counsel for Patrick Howard regarding returning the lease vehicle. Attention to refund from the W Hotel. Arrange to have correspondence sent to former employees regarding violation of Court's orders. Attention to inquiry from Joe Paterno regarding storage for inventory of TU bottles. Attention to correspondence from investors. Correspond regarding returning Patrick Howard's lease vehicle. Personally email notice of violation to Ron Scherer.	4.20	\$325.00	\$1,365.00
4/13/2017	KDB	Preparation, filing, and service of Receiver's Notice of Former Employees' Violation of Order Appointing Receiver.	1.00	\$125.00	\$125.00
4/13/2017	KJS	Preparation and revision of correspondence to counsel for OE Capital former employees regarding	0.50	\$300.00	\$150.00

representation and request for investor funds by OE Capital.

4/13/2017	NLM	Draft letter to Rob Castle regarding investor group letter and scheme. Pursue strategy regarding same. Pursue investigation regarding contact information for investors. Conference with Receiver.	2.00	\$250.00	\$500.00
4/13/2017	WCS	Research issues, study evidence, and draft motion to show cause. Send voicemail to court reporter for transcription. Attention to obtaining reimbursement from the NW Hotel for canceled event. Attention to investor inquiries. Review harassing correspondence from Ron Scherer. Send correspondence to Ron Scherer regarding harassment of my staff. Attention to letters notifying former employees of their violations of the Receivership Order. Attention to information from investors. File Notices of violations of Court Orders.	10.00	\$325.00	\$3,250.00
4/14/2017	KJS	Analysis of motion to show cause related to contempt of orders by employees. Review and analysis of initial draft of motion.	0.60	\$300.00	\$180.00
4/14/2017	WCS	Revise and edit correspondence to Rob Castle regarding irreconcilable conflict in representing former employees and legitimate investors as well as false pretenses under which money is being sent to his firm. Travel to BMW dealership to meet counsel for Patrick Howard to return lease vehicle. Accomplish same. Revise and edit motion to show cause. Attention to same. Correspond with investors regarding texts between Patrick Howard and them. Confer with investor regarding receivership.	10.00	\$325.00	\$3,250.00
4/15/2017	NLM	Review and revise motion to show cause. Email to Receiver regarding same.	2.50	\$250.00	\$625.00
4/15/2017	WCS	Attention to draft motion to show cause. Revise and edit same.	1.80	\$325.00	\$585.00
4/16/2017	KJS	Preparation of affidavit of Receiver in support of motion to show cause. Preparation of affidavit of investor in support of motion. Revision of draft motion. Preparation of exhibits to motion and appendix.	1.90	\$300.00	\$570.00

4/16/2017	WCS	Revise and edit motion to show cause. Revise and edit affidavits regarding same. Research legal standards and other issues.	4.00	\$325.00	\$1,300.00
4/17/2017	KJS	Preparation of exhibits to motion to show cause. Correspondence to Doville regarding response to communication.	0.50	\$300.00	\$150.00
4/17/2017	NLM	Review and revise motion to show cause and brief in support of same. Pursue strategy regarding same. Draft appendix. Pursue exhibits for use in appendix. Review and revise affidavits for use in support of motion to show cause. Conduct legal research regarding show cause requirements. Conduct legal research regarding brief form requirements.	8.00	\$250.00	\$2,000.00
4/17/2017	SJM	Draft of cover page, table of contents, and table of authorities for Receiver's Brief in Support of Motion to Show Cause, with Appendix. Review of signature pages pertaining to affidavits relating to the brief.	1.20	\$100.00	\$120.00
4/17/2017	WCS	Revise and edit motion to show cause. Finalize affidavits and exhibits. Confer with Andrea regarding affidavit. Arrange to have mobile notary meet with affiant for signature.	7.00	\$325.00	\$2,275.00
4/18/2017	KJS	Revision of motion and brief related to contempt by former employees and Patrick Howard. Telephone conference with counsel for SEC regarding brief and evidence in support. Review of additional communication from investor email.	1.70	\$300.00	\$510.00
4/18/2017	NLM	Review and analyze Affidavit of Andrea Venezia. Incorporate same into the motion to show cause evidence. Review and revise motion to show causes. Preparation of same for filing.	3.50	\$250.00	\$875.00
4/18/2017	SJM	Review and revisions to Motion to Show Cause, Brief in Support, including all exhibits and related appendix and appendix index.	3.00	\$100.00	\$300.00
4/18/2017	WCS	Attention to revising brief in support for motion to show cause. Review correspondence forwarded by	3.50	\$325.00	\$1,137.50

investors. Revise and edit motion to show cause.  
Multiple conferences regarding same.

4/19/2017	KJS	Final preparation and revision of motion and brief in support of motion to show cause. Telephone conference with Timothy McCole, counsel for SEC, regarding conference as to relief requested in motion. Preparation of revision of request for relief. Telephone conference with Phil Bezanson, counsel for Patrick Howard, regarding requested relief and conference on motion. Telephone conference with Ron Sheerer regarding conference as to requested relief. Telephone conference with Christine Horne regarding requested relief. Attempt to reach Rob Castle regarding requested relief as to Dovile Soblinksas. Attention to filing motion, brief and appendix. Attention to service of motion and brief as to non-parties. Attention to update of pleadings and filings in Receivership to Receiver website. Preparation of responses to pending investor communications.	3.20	\$300.00	\$960.00
4/19/2017	NLM	Review and revise motion to show cause, brief and appendix in support of same. Pursue strategy regarding same. Review case law provided by counsel. Conduct legal research regarding scope of contempt order. Pursue strategy regarding same.	2.00	\$250.00	\$500.00
4/19/2017	SJM	Final review and revisions to Motion to Show Cause, with Brief and Appendix in support. Filing and transmittal of same.	2.50	\$100.00	\$250.00
4/19/2017	WCS	Attention to motion to show cause. Finalize same. Respond to investor inquiries. Confer with Chad Alberson. Review case law related to contempt. Correspond regarding motion to show cause. Analysis regarding same. Review correspondence forwarded by investors.	4.50	\$325.00	\$1,462.50
4/20/2017	KJS	Correspondence to Chad Alberson regarding motion to show cause. Confer with website personnel regarding pleadings and updates to investor information on website.	0.50	\$300.00	\$150.00

4/20/2017	SJM	Correspondence with the court in relation to Motion to Show Cause, and Brief and Appendix in support.	0.50	\$100.00	\$50.00
4/20/2017	WCS	Conference with SEC attorneys regarding former employees interference with receivership. Attention to investor inquiries regarding Midland Funding IRA invoice directly to them. Attention to investor inquiry regarding tax issues. Respond to investor inquiry regarding motion to show cause. Attention to correspondence from the W hotel catering company whom the Receiver canceled an investor conference and sought reimbursement of deposit.	3.50	\$325.00	\$1,137.50
4/21/2017	WCS	Correspond with investors regarding receivership.	0.80	\$325.00	\$260.00
4/22/2017	WCS	Attention to issues related to tax matters with Jasmine DiLucci. Attention to issues related to Midland IRA letters to investors seeking payments.	1.10	\$325.00	\$357.50
4/24/2017	KJS	Review and analysis of correspondence from counsel for WHRZT. Confer with Receiver regarding response.	0.20	\$300.00	\$60.00
4/24/2017	WCS	Attention to letter from Whrzt. Detailed analysis regarding same. Address issues related to former employees misrepresenting matters to legitimate investors. Attention to investor inquiries.	3.00	\$325.00	\$975.00
4/25/2017	WCS	Evaluation of Whrzt letter. Attention to issue with Jasmine DiLucci regarding tax issues. Confer with investors regarding inquiry related to receivership. Correspond regarding same. Review voicemail message from Barrett Howell. Send correspondence regarding same.	2.70	\$325.00	\$877.50
4/26/2017	KJS	Review and analysis of response to communication from WHRTZ. Review and analysis of communication from counsel for Optimedia regarding response to demand.	0.20	\$300.00	\$60.00
4/26/2017	WCS	Attention to issues raised by Patrick Howard's counsel regarding discovery related to contempt hearings. Evaluate need to provide Court with proposed order addressing the civil/criminal contempt differences. Evaluate issues related to any attempt to conduct certain discovery. Review correspondence from	6.80	\$325.00	\$2,210.00



Andrew Elman with Optimedia. Review old voicemails from Daryl Cleveland regarding imminent payments the Receivership should expect from Whrzt. Revise, draft, edit, and send response to Daryl Cleveland correspondence. Forward same to SEC.

4/27/2017	KJS	Review and analysis of proposed order to show cause.	0.10	\$300.00	\$30.00
4/27/2017	KTDT	Update QuickBooks bank register. 4/11/17 bank reconciliation. Telephone conversation with Charles Beck at Texas Workforce Commission to confirm amounts due from Howard Capital Holdings and Optimal Economics Capital Partners, and mailing address for payments. Correspondence regarding same. Calculate Florida SUI due for first quarter of 2017.	1.00	\$125.00	\$125.00
4/27/2017	WCS	Detailed review of Midland Funding relationship. Conference with CEO from Midland Funding regarding their communications and collection efforts with investors. Reach agreement that Midland Funding will place freeze on collection efforts and work with the Receiver. Send correspondence regarding same along with Order appointing receiver. Draft update letter to investors. Attention to issues related to criminal and civil contempt. Forward proposed order to Court regarding motion to show cause to resolve issue. Correspond with investors regarding receivership issues. Attention to correspondence from James Bell on behalf of Dovile Soblinskas. Confer with James Bell regarding matter. Attention to quarterly report.	6.80	\$325.00	\$2,210.00
4/28/2017	KJS	Preparation of Receiver's Quarterly Status Report. Analysis of tax payments related to employee wages. Attention to tax filings and change of address for TU entity.	3.10	\$300.00	\$930.00
4/28/2017	KTDT	Review correspondence from Texas Workforce Commission. Review correspondence regarding Masters of Taxation payment and Florida Department of Revenue payment. Prepare Florida Department of Revenue Employer's Quarterly Report for Optimal Economics for first quarter of 2017. Prepare checks for Masters of Taxation, Florida Department of	2.30	\$125.00	\$287.50

Revenue, and Texas Workforce Commission. Prepare tax payments for mailing via certified mail. Research Florida Department of Revenue website for SUI employer account change form. Prepare preliminary first quarter accounting report for review.

4/28/2017	WCS	Review accounting portion of quarterly status report. Attention to investor inquiry.	1.50	\$325.00	\$487.50
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Total Fees	\$39,412.50
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**Expenses**

Description	Charges
Delivery - Eagle Express Inv.#PSSW.PLL-3799	\$36.00
Postage - Certified Mail	\$6.95
Postage - Certified Mail	\$6.32
Postage - Certified Mail	\$5.80
Special Delivery Inv.#532569	\$141.26
Postage - Certified Mail	\$8.21
Postage - Certified Mail	\$8.21
Postage - Certified Mail	\$5.69
Postage - Certified Mail	\$5.90

Total Expenses	\$224.34
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Total New Charges	\$39,636.84
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Retained Balance from Previous Invoices	\$18,852.00
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Balance Due	\$58,488.84
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