

IN THE CIRCUIT COURT FOR THE 11th
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

ANA DANTON, individually and
for the use and benefit of other
property owners within Hammocks
Community Association Incorporated,

CASE NO. 2022-007798-CA-01

Plaintiff,

v.

HAMMOCKS COMMUNITY ASSOCIATION
INCORPORATED,

Defendant.

**RECEIVER’S: 1) THIRD SUPPLEMENTAL REPORT
FOR THE PERIOD MARCH 28, 2023 THROUGH MAY 4, 2023; AND,
2) FOURTH INTERIM APPLICATION FOR ORDER AUTHORIZING
PAYMENT OF FEES AND EXPENSES AND FOR AUTHORIZATION TO
DISTRIBUTE FUNDS PURSUANT TO THE APPOINTMENT ORDER**

The Honorable David M. Gersten (Retired), the court-appointed Receiver (the “Receiver”) in the above-captioned action, and pursuant to the Court’s November 21, 2022 Order Appointing Receiver by Stipulation of the Parties, submits his Third Supplemental Report setting forth his activities and efforts to fulfill his court-appointed duties for the period from March 28, 2023 through May 4, 2023¹, together with his request for authorization for payment of interim professional fees and expenses for the period from February 16, 2023 through March 15, 2023.

¹ This Report supplements the Receiver’s January 4, 2023 Initial Report and Inventory, his February 22, 2023 Supplemental Report for the Period January 5, 2023 Through February 22, 2023, and his March 27, 2023 Second Supplemental Report for the Period February 23, 2023 Through March 27, 2023.

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I.
RECEIVER'S THIRD SUPPLEMENTAL REPORT

A.
INTRODUCTION

It has been nearly six (6) months since this Court appointed the Receiver. In that time, much has been accomplished. The recent election of the Association's Advisory Board is a shining example of how far the Association has come since the arrests of the majority of its prior Board last November.

In addition to engineering the election of the Association's Advisory Board, during the thirty-eight (38) days since the Receiver's prior Supplemental Report, the Receiver and his team have also:

- met with the Association's Advisory Board to coordinate the joint-operation of the Association moving forward;
- as recommended by the Advisory Board, established (with Court approval) an Assessment Committee to address some homeowners' concerns about quarterly (versus monthly) maintenance payments, which Committee has already conducted a meeting with the homeowners (and the Receiver);
- filed a Complaint for breach of fiduciary duty against some of the Association's prior Board members who have not been arrested, which the Receiver and his team are also using to pursue a claim against the Association's Directors and Officers Liability policy;
- continued to pursue a claim against the Association's Crime policy for the \$1 million limits under that policy;
- reached an agreement for the sale of the Association's unnecessary landscaping equipment and are on the verge of an agreement for the sale of some of the Association's unneeded vehicles;
- continued analyzing the Association's business records to identify additional potentially recoverable monies (and sources thereof);
- made progress on a potential agreement with one of the Association's prior attorneys to claw back monies paid by the prior Board;

- continued to fight the collection of a nearly \$300,000 judgment obtained by two (2) homeowners against the Association (and Gallego), which is now proceeding in Federal appellate court; and,
- neared completion of the analysis of all liens and foreclosure actions filed by the Association since 2015 for any self-dealing.

The Receiver and his team march on, with an eye towards the completion of their duties as soon as possible (and, of course, to this Court’s satisfaction).

B.
THE RECEIVER’S ACTIVITIES AND EFFORTS FOR THE PERIOD
MARCH 27, 2023 THROUGH MAY 4, 2023 AND ACTION PLAN
MOVING FORWARD

1.
The Election of the New Board Goes Off Without a Hitch

For the first time in years, on March 30, 2023, the Association fairly and freely elected a new Board, which will constitute an Advisory Board until the Court terminates this receivership. As conveyed to the Receiver and property manager FirstService Residential (“FSR”) by numerous Association members, the members were extremely satisfied with (and had complete confidence in) the “Fort Knox” election procedure established by the Receiver and his team.

In all, a total of 1,377 ballots were cast: approximately 25% of all Association members. In fact, to ensure that all Association members had their voices heard in this election, the Receiver accepted the votes of approximately a half a dozen members who arrived at the clubhouse shortly after the polls had closed.

On election night, once the ballots were removed by the Receiver from the locked ballot box (which was bolted to the floor in the Association’s clubhouse, guarded by security during clubhouse office hours, and monitored by a security camera 24 hours a day), the votes were tallied by certain selected employees of the Receiver’s firm, the Receiver’s lead counsel (Damian Valori Culmo, “Lead Counsel”), and FSR. All other individuals who wished to view the vote counting

process were cordoned off in a roped-off area in the clubhouse (outside of the vicinity in which the votes were being tallied). The Receiver's team worked diligently – and carefully² – to tally the votes, until nearly midnight.

The election resulted in the following candidates being appointed to a seat on the new Advisory Board: 1) Idalmen “Chicky” Ardisson; 2) Don Kearns; 3) Marcoantonio Real; 4) Carlos Villalobos; 5) Pete Cabrera; and, 6) Kristen Gurucharri. As there were a total of twelve (12) candidates, and pursuant to the Association's governing documents, each candidate who was not awarded a seat on the Advisory Board will serve as an alternate to one of the Advisory Board members (as each Board member is to have an alternate).

Following the election, and to ensure complete confidence in the election results, the Receiver posted all 1,377 ballots on the Association's website.

a.
The Advisory Board Has Its First Meeting, Harmoniously Electing Its Officers

On April 4, 2023 at 7:00 p.m. in the Association's clubhouse, and in compliance with the Association's governing documents, the Receiver conducted the first meeting of the Advisory Board. During that meeting: 1) and pursuant to this Court's Order appointing the Receiver, the Advisory Committee established by this Court was terminated, as was the Advisory Committee's counsel; 2) the Receiver appointed Jesmany Jomarron, Esq., previously counsel for the Advisory Committee, as the Advisory Board's counsel; 3) the Board elected, seamlessly and without any opposition, the Association's President and other officers³; 4) the Advisory Board was officially

² To ensure that no errors occurred, the votes on each ballot were tallied by two separate teams of vote counters. If those teams' tallies of the votes on any particular ballot did not match, the subject ballots were re-counted and any discrepancies were resolved.

³ Don Kearns was elected President, Chicky Ardisson was elected Vice-President, Pete Cabrera was elected Secretary, and Marcoantonio Real was elected Treasurer.

sworn in, pledging their allegiance to the Association and its members; 5) a schedule for regular Board meetings was established (i.e., the second Tuesday of every month, with the first such meeting to occur on May 9, 2023⁴); and, 6) the Board members and Association members were provided with an opportunity to comment on items that they would like to see added to the Board's meeting agenda going forward.

b.

The Receiver Meets with the Advisory Board to Focus on the Board's Vision

On April 17, 2023, the Receiver conducted his first meeting with the Advisory Board; prior to that meeting, the Receiver requested vision statements from each Advisory Board member. During that meeting, the Advisory Board members identified committees that they believe the Association will require going forward, including a Finance Committee, the existing Architectural Control Committee, a Neighborhood Committee, and a Governing Documents Committee.

c.

The Advisory Board Springs into Action, Putting Into Motion the Establishment of an Assessments Committee

In light of recent requests by numerous homeowners to pay their maintenance assessments monthly (rather than quarterly, as required by the Association's governing documents⁵) due to various hardships, during the April 17th meeting with the Receiver the Advisory Board also recommended that an Assessments Committee (consisting of Board members Messrs. Kearns and Real) be established to promptly address those concerns. Accordingly, on April 18, 2023, the

⁴ The schedule for the Board's meetings has also been posted on the Association's website.

⁵ In February 2021, the prior Board purportedly amended the Association's governing documents to effectuate various changes to personally benefit themselves, including requiring that maintenance payments be made monthly rather than quarterly (to generate additional late fees). However, that amendment was illegitimate as the requisite approval of the Association's members for that amendment had not been obtained by the prior Board. Accordingly, on February 2, 2023, the Receiver filed his Motion to Void that purported amendment. The next day, this Court entered the parties' Agreed Order granting the Receiver's Motion and properly restoring the Association's governing documents to their pre-amendment iteration.

Receiver filed his Motion to Allow Certain Homeowners Demonstrating Economic Hardship to Pay Assessments Monthly, which Motion was granted by this Court that same day. Pursuant to this Court's Order granting that Motion, this Court: 1) authorized the Receiver to create an advisory Assessments Committee; and, 2) upon the recommendation of the Committee and approval by the Receiver or (upon his termination) the Board, authorized certain homeowners to pay their maintenance assessments monthly.

On April 20, 2023 at 7:00 p.m. in the Association's clubhouse, the Assessments Committee conducted its first meeting (which all homeowners were permitted to attend in-person or via Zoom). As a result of that meeting, the Assessments Committee recommended to the Receiver that all concerned homeowners in attendance (either in-person or via Zoom) be permitted to pay their maintenance payments monthly through the end of 2023. The Receiver will announce his decision on that recommendation during the Advisory Board's May 9th monthly meeting.

In light of some homeowners' concerns with quarterly maintenance payments, the Assessments Committee is also considering a potential amendment of the Association's governing documents to revert back to monthly maintenance payments for all homeowners.

2.

Replenishing the Association's Coffers

a.

Claims to Recover Damages Caused by the Prior Board's Fraud

i.

Claims Against the Association's Insurers

As discussed in his prior Reports, the Receiver has submitted a Proof of Loss with the Association's Crime policy⁶ carrier to recover \$3,429,744.03 in payments made by the prior Board

⁶ As the Association's Crime policy was set to expire, on April 26, 2023 the Receiver procured a replacement Crime policy for the Association (with limits of \$1,000,000), which was difficult in light of the Association's open claims.

to vendors that have been identified by independent forensic accountants Kapila Mukamal LLP (“KM”) as fraudulent, subject to the Crime policy’s \$1 million policy limits. Previously, the Receiver’s counsel and KM spoke with an accountant hired by the Crime carrier to investigate and confirm the Association’s Proof of Loss; the carrier’s accountant requested certain underlying information and additional supporting documentation, which was provided to that accountant shortly prior to the Receiver’s last Report to this Court.

Since the Receiver’s last Report, the carrier’s accountant has requested additional documentation, which Lead Counsel (working with KM) has provided. Accordingly, the Receiver is awaiting the carrier’s completion of its investigation.

ii.

Claims Against the Association’s Prior Attorneys and Their Insurers

As discussed in his prior Report, in March the Receiver sent demand letters to the five (5) criminal defense attorneys who represented former Board member Marglli Gallego (“Gallego”) and one of her accomplices (Richard Trueba, who engaged in a kickback scheme with Gallego)⁷, demanding the return of \$871,205.00 in Association monies improperly paid to those attorneys for that representation. All of those attorneys have since refused to return the monies improperly paid to them. The Receiver will be proceeding with lawsuits against each of those attorneys shortly.

The Receiver also previously advised this Court of his demand to the Association’s prior attorney’s professional liability insurer (New York Marine and General Insurance Company) for \$3,000,000.00 in damages sustained by the Association as a result of that counsel’s negligent or other wrongful conduct. That insurer has requested additional support for that demand; Lead Counsel is currently working on providing that information to that insurer.

⁷ Those attorneys include Santiago Legal, PLLC, Marshall Dennehy Warner Coleman & Goggin, P.C., Hermida Law Firm, LLC, Jauregui Law, P.A., and Quintero Broche PA.

iii.

Claims Against the Association's Prior Board

At the time of his prior Report, the Receiver was evaluating claims against certain of the Association's former officers and directors (who were not arrested). The Receiver has completed his evaluation and, on April 20, 2023, filed his Complaint against former Board members Ligia Capielo (who served as the Association's Vice-President during 2022), Marlene Kopec (who served as the Association's Secretary during 2022), Madeline Maceda (who served as the Association's Treasurer from 2017 through 2022), and Luz Ordonez (who served on the Board and was a signatory on the Association's bank accounts during 2021 and 2022) (collectively, the "Sued Directors"). A copy of the Receiver's Complaint is attached as **Exhibit 1**. That lawsuit is before the Honorable Lisa Walsh.

In his Complaint, the Receiver asserts a breach of fiduciary duty claim against each of the Sued Directors, which breaches resulted in: 1) allowing false or inaccurate information to be disseminated to homeowners; 2) the suppression of the true financial condition of the Association; 3) permitting the prior Board to make fraudulent transfers and otherwise allowing the prior Board's misappropriation of the Association's assets to occur; 4) other myriad conflicts of interest; 5) neglecting the maintenance and repair of the Association's property; 6) disregarding the Association's established procedures for elections, meetings, and other operations; and, 7) the needs of the Association's homeowners being ignored.

Simultaneously with the filing of that Complaint, the Receiver sent a demand letter to the Association's Directors and Officers Liability policy insurer, attaching a copy of that Complaint and demanding the limits under that policy (\$2,000,000). As that demand was only recently made, the Receiver has not yet received a response. Lead Counsel has been working with KM to compile

supporting information in anticipation of that insurer's request for same (to expedite the insurer's response to that claim).

b.

The Sale of Unnecessary Association Assets Moves Forward

i.

Vehicles

As discussed in the Receiver's prior Report, the Association owns thirty-two (32) vehicles (including one trailer). Many of those vehicles were found to be in poor condition, with some inoperable and in a state of disrepair.

After consulting with FSR, the Receiver decided that it would be in the Association's best interests to keep seven (7) of those vehicles, including four (4) for maintenance, two (2) for the Association's violations department, and one for general use. Those vehicles are unencumbered by any loans.

As to the remaining vehicles, ten (10) have not been located. Accordingly, on April 19, 2023, Lead Counsel visited the Miami-Dade Police Department Hammocks District Station and filed theft reports for each of those vehicles.

For the remaining vehicles, and after obtaining and considering multiple offers from various car dealers (including CarMax, AutoNation, and Carvana), the Receiver determined that Carvana was the best option to sell nine (9) of those vehicles (all unencumbered). Six (6) of those vehicles are scheduled to be purchased by Carvana on May 8, 2023 and the other three (3) on May 15, 2023, with the final price to be determined based upon Carvana's appraisal of each vehicle. Based upon the recommendation of Carvana's inspector, the Receiver had new batteries installed in those vehicles to increase their appraised value.

There are five (5) vehicles that were financed through Ally Bank, with outstanding loans totaling \$96,200.60. Carvana has expressed an interest in purchasing those vehicles as well,

although a payoff letter from Ally Bank is required before moving forward with those potential sales; those letters have been requested. Based upon the preliminary information received, the Receiver anticipates that those loans can be repaid and a net gain realized from the sale of those vehicles.

One (1) of the Association's vehicles is encumbered by a mechanics lien claimed by Galceran Auto Electric LLC ("Galceran") for repair work directed by the prior Board. On March 8, 2023, Galceran sent a Notice of Claim of Lien and Proposed Sale of Motor Vehicle to the Association (for a sale of that vehicle to occur on April 13, 2023). As a result, on April 5, 2023, the Receiver instituted an action against Galceran (Case No. 2023-014842-CA-01, pending before the Honorable Barbara Areces) by filing his Demand for Hearing to Cancel or, in the Alternative, to Stay the Proposed Sale of Vehicle. On April 13, 2023, Judge Areces entered her Order cancelling that sale and ordering Galceran to store the vehicle or return it to the Receiver until the dispute has been resolved. The Receiver is currently investigating the claimed lien to either resolve or dispute same.

ii.
Landscaping Equipment

In addition to unnecessary vehicles, the Association also maintained unnecessary landscaping equipment (identified in Exhibit C to the Receiver's Initial Report). The Receiver has recently reached an agreement with the Association's landscaping vendor, Turf Management ("Turf"), for Turf's purchase of all of that equipment for \$61,000. The funds realized from the sale of that equipment are being used to satisfy the debt incurred by the Association in acquiring that equipment and will be in the form of a credit on the price of the beach renovation services that Turf recently began performing for the Association, discussed below.

3.

The Forensic Accountants' Analysis Continues

a.

Further Analysis of the Association's Business Records

KM's analysis of the Association's records (to identify any additional relationships between the prior Board and individuals or entities that received payments from the Association) continues apace. Thus far, KM has identified: 1) eighteen (18) former Association employees who were related to or associated with the prior Board or previously identified fraudulent vendors; and, 2) seventeen (17) potentially fraudulent vendors that received payments from the Association.

During the current reporting period, KM began to analyze invoices that were found within the Association's records, which purportedly support the alleged services being provided by certain vendors, in furtherance of identifying additional potentially fraudulent vendors.

KM also worked (and continues to work) with Lead Counsel in compiling necessary information requested (or likely to be requested) by the Association's insurers in connection with the Association's claims against those insurers, as discussed above.

b.

The Association's Bank Accounts

The current balance of the Association's bank accounts totals \$375,451.33, more particularly as follows: 1) \$245,000.00 in an account at City National Bank⁸; 2) \$112,271.03 in checking accounts at Popular Bank⁹; 3) \$674.22 in accounts at Truist Bank; and, 4) \$17,506.08 in accounts at CIT/First Citizens Bank.

⁸ The monies in the Association's account at TD Bank (\$115,271.29 at the time of the Receiver's prior Report) were transferred to the Association's account at City National Bank.

⁹ With regard to the Association's pre-receivership loan from Popular Bank (which had an outstanding balance of \$435,547.67 at the time the Receiver was appointed), during the current reporting period the Receiver has made another of the \$44,353.59 monthly payments on that loan, bringing the current loan balance down to \$220,028.02.

KM has continued to reconstruct the activity in the approximate twenty (20) Association bank accounts that were active from 2019 through 2022. KM also continued working with the Receiver's counsel to obtain any missing records from the Association's current or former financial institutions. Once those records are obtained, KM can complete its bank account reconstruction, which will be used: 1) to re-create the homeowners' historical payment activity; and, 2) as a basis for reconstructing the Association's financial statements for the years 2019 through 2022, which statements are necessary for the Association's annual audits and tax returns. KM's bank account reconstruction will also be used to identify other transfers outside of the ordinary course of business and, thus, other potentially recoverable transfers.

4.

The Association's Business Operations

a.

FSR's Continued Operation of the Association, Under the Direction of the Receiver

During the period from March 25, 2023 through May 3, 2023, FSR collected \$1,635,545.17 in assessments from homeowners, together with \$3,100.00 in boat storage fees.

FSR also caused to be paid, under the direction of the Receiver, \$1,015,224.57, in Association expenses, including, but not limited to, for the payment of: 1) the Association's professionals, to wit, Turf, security vendor (Elite Guard, Inc.), FSR, Elite Pool & Spa Services (for its final services before being replaced by Florida's Bright & Blue Pools & Beach Service ("FBB")), FBB, and The Fitness Solution; 2) insurance premiums; 3) utilities; 4) election materials/supplies; and, 5) the Court-approved fees and costs of Lead Counsel for the application period from December 16, 2022 through January 15, 2023 as well as the Court-approved fees and costs for the Receiver, Lead Counsel, KM, the Advisory Committee's counsel, and outside counsel Mark Migdal & Hayden for the application period from January 16, 2023 through February 15, 2023 (totaling \$389,348.15).

During the current reporting period, and in addition to the actions discussed *supra*, FSR has also (under the direction of the Receiver): 1) and with Lead Counsel, finalized an agreement for the Association's boat storage spaces; and, 2) continued to work to obtain proposals for a) monthly pest control services for the Association's clubhouse and Wild Lime Center, b) the repair of non-leased light poles located throughout the Association's property, and, c) reduced AT&T and Comcast plans.

b.

The Association's Landscaping Needs are Now Back to Normal

After months of tackling the Association's grossly neglected landscaping needs, the Association's landscaping vendor, Turf, has now settled into regular landscaping maintenance consisting of regular lawn maintenance for the Association's roadways, greenbelts, recreation centers, and neighborhoods (twice a month).

As noted in his prior Report, the Receiver requested that Turf provide proposals for the maintenance of the Association's twenty-two (22) beaches, which were also neglected by the prior Board. At the time of his prior Report, the Receiver was negotiating with Turf; Turf provided an original proposal and the Receiver requested (and was provided with) a more cost-effective, revised proposal. The Receiver recently accepted that revised proposal, which provides for: 1) supplementing the existing sand on each of the Association's twenty-two (22) beaches with a 3-inch layer of silica beach sand; and, 2) the removal of overgrown dwarf Pandanas plants on six (6) of those beaches. The total cost of that work, which began on May 1st, is \$223,400. As discussed above, the monies from the sale of the Association's unneeded landscaping equipment will be used to offset the cost of Turf's beach maintenance work.

c.

Additional Work to Maintain the Association’s Grounds

As discussed in the prior Report, the Receiver replaced the Association’s prior pool vendor (Elite Pool & Spa Service, for which there were concerns about ties to the prior Board), with FBB to service the pools at the Association’s three (3) recreational facilities. On April 6th, FBB began re-servicing the Association’s pools.

5.

Lawsuits Involving the Association

a.

The Association’s Active Lawsuits

The Receiver’s counsel continues to evaluate the approximate fifty (50) pending lawsuits filed by or against the Association, including the dismissal of any meritless lawsuits filed at the direction of the prior Board and the resolution (as appropriate) of any lawsuits filed against the Association.

b.

The Cepero Judgment: Appellate Proceedings March Forward

The Receiver continues to exhaust every available remedy to attempt to relieve the Association from a Final Judgment in the amount of \$288,437.60 entered against Gallego and the Association (jointly and severally) in the Bankruptcy Court case styled *Hammocks Community Association, Inc., et al. v. Josue Cepero, et al.*, Case No. 21-cv-22821-RKA, arising from Gallego’s harassment of the subject homeowners, Josue Cepero and Leticia Cepero (the “Ceperos”).

As discussed in the Receiver’s prior Report, the Bankruptcy Court scheduled the Receiver’s Motion for Relief from that Judgment for hearing on April 11, 2023 at 1:30 p.m.; in the interim, the appeal of that Final Judgment (filed pre-receivership) was stayed.

Unfortunately, and despite evidence obtained by the Receiver that the Ceperos benefitted from a kickback scheme with Gallego (discussed in more detail in the Receiver’s prior Report), the Bankruptcy Court denied the Receiver’s Motion for Relief. Accordingly, the pre-receivership appeal is moving forward: the Association’s Reply Brief is due May 24, 2023 and oral argument has been scheduled for June 29, 2023. In the interim, the Receiver has also filed a Notice of Appeal of the Bankruptcy Court’s April 14, 2023 Order denying the Receiver’s Motion for Relief.

c.

The Receiver’s Analysis of the Prior Board’s

Foreclosure Lawsuits – and Liens – Nears Completion

Shortly, the Receiver will have completed his analysis of all foreclosure cases and liens filed by the Association since 2015, the year that Gallego became an officer of the Association, for any self-dealing by the prior Board and/or related individuals or entities. In total, there were over 550 liens and over 100 foreclosure lawsuits (excluding pending foreclosure lawsuits) filed by the Association during the subject time period.

With the exception of certain former employees of the Association, the Receiver has completed his analysis of those liens and lawsuits and has not identified any suspicious property transfers to the prior Board, related individuals or other “insiders.” The Receiver will soon complete his analysis (with regard to those former employees of the Association) and will provide the final results of his analysis in his next Report to this Court.

Notably, the Receiver has located many liens filed by the prior Association that do not appear to have been satisfied and about which no further action was taken by the Association’s prior attorneys. Accordingly, the Receiver is investigating with FSR any amounts still owed on those liens. In addition, the Receiver will discuss with the Advisory Board the policy to be implemented by the Association going forward as to when liens and legal proceedings will be

pursued by the Association for unpaid assessments (vis-à-vis the amount outstanding and/or the age of the debt), including with regard to any unsatisfied pending liens.

6.

The Association's Prior Attorneys

To date, each of the Association's prior attorneys and firms have provided documents requested by the Receiver. One of the Association's prior attorneys, Rasco Klock Perez & Nieto, P.A. ("Rasco"), has produced in excess of 75,000 pages of documents to the Receiver, the review of which is still being conducted by the Receiver's team.

In addition, the Receiver is still awaiting the production of all documents requested from another of the Association's prior attorneys, Alfaro & Fernandez, P.A. ("Alfaro"). Pursuant to this Court's April 13, 2023 Order denying Alfaro's Motion for Protective Order and Motion to Quash Subpoena, Alfaro has until May 11th to complete its document production to the Receiver.

Accordingly, the Receiver is still evaluating potential (or additional, as applicable): 1) claims against prior counsel and/or their insurance carriers to claw back any monies improperly paid to them, particularly monies paid in furtherance of and/or otherwise to conceal the prior Board's fraud; and, 2) referrals to the Florida Bar.

In the interim, the Receiver has made progress towards a potential agreement with another of the Association's prior attorneys (to resolve the Receiver's claims against that attorney seeking the return of approximately \$100,000 paid to that attorney by the prior Board).

C.

CONCLUSION

With a newly-appointed Advisory Board beginning to take the reins, the transition of the Association from a receivership back to normalcy is imminent. As detailed above, there are remaining issues that the Receiver and his team need to run to the ground (completing the work that they began almost six (6) months ago) to ensure that the wrongs of the prior Board are rectified

as fully as possible so that the post-receivership Association can move forward without the need to look backwards.

II.
RECEIVER’S FOURTH INTERIM APPLICATION FOR ORDER AUTHORIZING
PAYMENT OF FEES AND EXPENSES AND FOR AUTHORIZATION TO
DISTRIBUTE FUNDS PURSUANT TO THE APPOINTMENT ORDER

To assist the Receiver in carrying out his duties, and as authorized by the Amended Appointment Order, the Receiver: 1) retained Lead Counsel to assist with legal matters, including preparation and filing of court documents, and operating the Association; 2) authorized SBK Legal, Michael S. Kaufman, Esq., and The Morgan Law Group (collectively, the “Advisory Committee Counsel”) to jointly represent the Advisory Committee and, in that regard, work with the Receiver and assist with the operation of the Association under the supervision of the Receiver; and, 3) retained Mark Migdal & Hayden (“Outside Counsel”) to represent the Association in certain pending cases filed by or against the Association, mostly foreclosure cases filed by banks.

The fees incurred by the Receiver’s office, Lead Counsel, the Advisory Committee Counsel, and Outside Counsel, as well as forensic accounts Kapila Mukamal (“KM”), are reflected on the invoices attached hereto as **Composite Exhibit 2** and reflect the time entries and work performed by the Receiver and his professionals for the benefit of the Association during the Application Period (February 16, 2023 through March 15, 2023)¹⁰ as well as the Receiver’s reductions thereto, as applicable.

As reflected in Composite Exhibit 2, during the Application Period: 1) the Receiver’s office incurred fees in the amount of \$112,575.00, which the Receiver has reduced by seven (7) percent

¹⁰ The fees and costs, as applicable, for each of KM and Outside Counsel that are the subject of the instant Application are for the period from February 1, 2023 through February 28, 2023; Outside Counsel and KM’s fees and costs for the period from February 1, 2023 through February 15, 2023 (i.e., during the prior Application Period) were not included in the Receiver’s fee application for the prior Application Period and, thus, are included in the instant Application.

(7%) to \$104,694.75, and costs in the amount of \$51.24, for a total of \$104,745.99; 2) Lead Counsel has incurred fees in the amount of \$78,032.50 and costs in the amount of \$1,884.86, for a total of \$79,917.36; 3) Advisory Committee counsel Michael S. Kaufman, Esq. incurred fees in the amount of \$20,850.00, which the Receiver has reduced to \$10,650.00, and costs in the amount of \$500.00, which the Receiver has removed, for a total of \$10,650.00; 4) Advisory Committee counsel SBK Legal incurred fees in the amount of \$9,375.00 and costs in the amount of \$350.00, for a total of \$9,725.00; 5) Advisory Committee counsel The Morgan Law Group incurred fees in the amount of \$47,070.00, which the Receiver has reduced by five (5) percent (5%) to \$44,716.50, and costs in the amount of \$2,563.15, for a total of \$47,279.65; 6) KM incurred fees in the amount of \$63,860.20, which KM reduced by seventeen (17) percent (17%) to \$55,344.87, and costs in the amount of \$246.26, for a total of \$55,591.13; and, 7) Outside Counsel incurred fees in the amount of \$10,900.00.

At this time, the Receiver is seeking approval and authorization for payment of all such fees (at the reduced amounts) and costs, such that payment at this time would total \$318,809.13.

CERTIFICATION

The Honorable David M. Gersten (Retired), Receiver, hereby certifies that:

- (a) I have read this application (the “Application”);
- (b) To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate;
- (c) All fees contained in the Application are based on the rates listed in the exhibits hereto and such fees as reduced by the Receiver are reasonable, necessary and commensurate with the skill and experience required for the activity performed;
- (d) I have not included in the amount for which reimbursement is sought the authorization 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 bulk mailing, photocopies and facsimile transmission);
- (e) In seeking reimbursement for a service which I, Lead Counsel, Advisory Committee Counsel, Outside Counsel, and/or KM justifiably purchased or contracted for from a third party (including but not limited to copying, imaging, bulk mail, messenger service, overnight courier, or computerized research), I request reimbursement only for the amount billed to me, Lead Counsel, Advisory Committee Counsel, Outside Counsel, or KM, as applicable, by the third-party vendor and paid by me, Lead Counsel, Advisory Committee Counsel, Outside Counsel, and/or KM, as applicable, to such vendor. To the extent that such services were performed by me as Receiver, Lead Counsel, Advisory Committee Counsel, Outside Counsel, and/or KM, I certify that I, Lead Counsel, Advisory Committee

Counsel, Outside Counsel, and/or KM, as applicable, am/is not making a profit on such reimbursable service.

/s/ David M. Gersten

THE HONORABLE DAVID M. GERSTEN
(RETIRED)
COURT-APPOINTED RECEIVER

WHEREFORE, the Honorable David M. Gersten (Retired), as Court-appointed Receiver, respectfully requests that the Court enter an order: (1) approving and authorizing payment of fees and costs to Receiver's office of \$104,745.99, to Lead Counsel of \$79,917.36, to Michael S. Kaufman, Esq. of \$10,650.00, to SBK Legal of \$9,725.00, to The Morgan Law Group of \$47,279.65, to KM of \$55,591.13, and to Outside Counsel of \$10,900.00, incurred during the Application Period (February 16, 2023 through March 15, 2023), except as otherwise specifically noted above; and (2) granting such further relief as the Court deems just and proper.

Respectfully submitted this 4th day of May, 2023.

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Melanie E. Damian, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 4, 2023, a true and correct copy of the foregoing was filed electronically using the Court's electronic filing system, which will send notice and a copy of this filing to all counsel of record listed in the Florida Courts E-Filing Portal.

/s/ Eric R. Thompson
Eric R. Thompson, Esq.

EXHIBIT 1

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE
COUNTY, FLORIDA

HON. DAVID M. GERSTEN (RET.),
as Court-Appointed Receiver of
the HAMMOCKS COMMUNITY
ASSOCIATION INCORPORATED
and its affiliated Receivership Entities,

CASE NO.

Plaintiff,

v.

LIGIA CAPIELO, an individual,
MARLENE KOPEC, an individual,
MADELINE MACEDA, an individual, and
LUZ ORDONEZ, an individual,

Defendants.

**COMPLAINT FOR DAMAGES AND OTHER
RELIEF AND DEMAND FOR JURY TRIAL**

The Plaintiff, the Honorable David M. Gersten (Retired) as the Court-appointed and acting receiver of the Hammocks Community Association Incorporated sues Defendants Ligia Capielo, Marlene Kopec, Madeline Maceda, and Luz Ordonez (collectively referred to herein as the “Defendants”), and alleges:

JURISDICTION AND VENUE

1. This is an action for damages in excess of Seven Hundred and Fifty Thousand Dollars (\$750,000) exclusive of interests, costs, and attorney’s fees.

Plaintiff, the Receiver

2. The Receiver was appointed by the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County pursuant to its Preliminary Emergency Order Appointing Receiver by Stipulation of the Parties dated November 17, 2022 (the “Emergency Order”) and Order

Appointing Receiver by Stipulation of Parties dated November 21, 2022 (the “Amended Appointment Order”) (collectively herein the “Receivership Orders”), in the action styled: *Ana Danton vs. Hammocks Community Association Incorporated*, Case No. 2022-007798-CA-01, pending in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida (the “Danton Action”).

3. Pursuant to the Emergency Order Plaintiff was appointed as Receiver over the Hammocks Community Association Incorporated (the “Association”) “with full and complete power and authority over the entire association’s business including but not limited to its properties, finances, staff, employees, and all other matters of the association pending further order of the Court.” *See* Emergency Order at ¶ 2.

4. The Amended Appointment Order confirmed the appointment of the Receiver and expands the Receiver’s powers and authority. Specifically, the Amended Appointment Order appointed the Receiver as the sole board member for the Association with full powers to act for the Association until the Association can be properly returned to the management of the owners. *See* Amended Appointment Order at ¶¶ 2, 9, 10, 11, 15.

5. Moreover, the Receiver has authority and standing to bring this action against Defendants pursuant to Section 10(vi) of the Amended Appointment Order, which directs the Receiver to “institute, prosecute, maintain, defend, intervene, and otherwise participate in any legal proceeding by or against the Association or in which the Association or its creditors or members have any interest, and represent in every way the Association and its members”. *See* Amended Appointment Order at Section 10(vi).

The Hammocks Community Association

6. The Association is an “association” as defined in Chapter 720, Florida Statutes, located within Miami-Dade County.

7. The Association is governed by the Amended and Restated Declaration of Covenants, Restrictions, Easements, Charges and Liens for the Hammocks (the “Declaration”) and the Restated Articles of Incorporation and Restated By-Laws of the Association recorded in the Public Records of Miami-Dade County, Florida (collectively referred herein as the “Governing Documents”).

Defendants

8. During the year 2022, Defendant Ligia Capielo (“Capielo”) was on the board of directors of the Association with a title of Vice President and/or Director. Among other duties that she performed in those roles, Capielo was involved in and knew or should have had knowledge of all material aspects of the business, operational, regulatory, and financial affairs of the Association, and was acting within the scope of her duties as an officer, director, manager, employee, and/or control person of the Association. During a time material to this Complaint, acting alone or in concert with others, Capielo has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint on behalf of the Association. Defendant is a resident of Miami-Dade County, Florida and in connection with the matters alleged herein, transacts or has transacted business in Miami-Dade County, Florida.

9. During the year 2022, Defendant Marlene Kopec (“Kopec”) was on the board of directors of the Association with a title of Secretary and/or Director. Among other duties that she performed in those roles, Kopec was involved in and knew or should have had knowledge of all material aspects of the business, operational, regulatory, and financial affairs of the Association,

and was acting within the scope of her duties as an officer, director, manager, employee, and/or control person of the Association. During times material to this Complaint, acting alone or in concert with others, Kopec has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint on behalf of the Association. Defendant is a resident of Miami-Dade County, Florida and in connection with the matters alleged herein, transacts or has transacted business in Miami-Dade County, Florida.

10. During the years 2017-2022, Defendant Madeline Maceda (“Maceda”) was on the board of directors of the Association with a title of Director and/or Treasurer and named as a signatory on the Association’s bank accounts. Among other duties that she performed in those roles, Maceda was involved in and knew or should have had knowledge of all material aspects of the business, operational, regulatory, and financial affairs of the Association, and was acting within the scope of her duties as an officer, director, manager, employee, and/or control person of the Association. As signatory on the Association’s bank accounts, Maceda was responsible for review and approval of all incoming and outgoing funds and transactions taking place in those bank accounts. At all times material to this Complaint, acting alone or in concert with others, Maceda has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint on behalf of the Association. Defendant is a resident of Miami-Dade County, Florida and in connection with the matters alleged herein, transacts or has transacted business in Miami-Dade County, Florida.

11. During the years 2021-2022, Defendant Luz Ordonez (“Ordonez”) was on the board of directors of the Association with a title of Director and named as signatory on the Association’s bank accounts. Among other duties that she performed in that role, Ordonez was involved in and knew or should have had knowledge of all material aspects of the business,

operational, regulatory, and financial affairs of the Association, and was acting within the scope of her duties as an officer, director, manager, employee, and/or control person of the Association. As signatory on the Association's bank accounts, Ordonez was responsible for review and approval of all incoming and outgoing funds and transactions taking place in those bank accounts. During a time material to this Complaint, acting alone or in concert with others, Ordonez has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint on behalf of the Association. Defendant is a resident of Miami-Dade County, Florida and in connection with the matters alleged herein, transacts or has transacted business in Miami-Dade County, Florida.

12. Venue is proper in Miami-Dade County, Florida, because all events giving rise to these claims occurred in Miami-Dade County, and the Association was damaged in Miami-Dade County. In addition, this action was brought to accomplish the Court's directives in the Receivership Orders entered in the Danton Action also pending in the Circuit Court in and for Miami-Dade County.

General Allegations

13. The Association is composed of approximately 5,543 homeowners, living in a community referred to as the Hammocks, which community is managed pursuant to the Association's Governing Documents.

14. The homeowners residing within the Hammocks pay monthly maintenance assessments to the Association, the amount of which is determined by the annual budget.

15. The Association was represented and managed by a board of directors, including Defendants, who must abide by the rules and regulations of the Governing Documents.

Former Board Members' Misappropriation of Association Monies

16. During all times material to this Complaint, the Association was “self-managed, meaning the Association did not an engage a licensed property manager but instead was managed by the Board of Directors. Unfortunately, Defendants ceded managerial control to certain board members who have now been charged with theft of the Association’s funds, among other crimes against the Association.

17. Specifically, former board members Marglli Gallego, who served as President and/or Director from 2015 to 2021, Monica Ghilardi, who served as Director and then President from 2015 to November 2022, Myriam Arango Rodgers, who served as Director from 2015 to 2022, and Yoleidis Lopez Garcia, who served as Director from 2016 to 2021, were all charged with crimes related to theft of the Association’s funds.

18. In April 2021, the former President of the Association Marglli Gallego was arrested on charges of grand theft and organized fraud arising from her appropriation of Association monies. Defendant’s Maceda and Ordonez were Directors at the time that Gallego was arrested and charged and knew or should have had knowledge of the allegations leading to Gallego’s arrest. The Florida State Attorney’s Office engaged in an investigation of the Association resulting in Gallego’s arrest in March 2021 and in the arrest of Gallego again and four other former board members in November 2022.

19. In particular, on November 15, 2022, five of the Association’s former Board members – former Association President Marglli Gallego, her husband, Jose Gonzalez, Monica Ghilardi, Myriam Rodgers, and Yoleidis Lopez Garcia – were arrested on numerous charges, including racketeering and money laundering.

The Powers and Duties of Defendants as Officers and Directors of the Association

20. The board of directors of the Association is authorized to exercise all powers necessary to manage the Association, as outlined in the Bylaws of the Association:

Section 5. Powers.

The property and business of the Association shall be managed by its Board of Directors which may exercise all such powers of the Association and do all such lawful acts and things as are not by Statute, Declaration, Articles of Incorporation or by these By-Laws, directed or required to be exercised or done by the Members personally.

See Bylaws, Art. V, Sec. 5.

21. The board of directors possess a range of powers.¹ These powers are closely linked to the fiduciary duties of the board, which require them to act in the best interests of the Association and its members.²

¹ The Board has certain duties, including the duty to determine and levy assessments to cover the cost of operating and maintaining the common properties of the community, as well as to collect, use and expend the assessments collected for this purpose. The Board is authorized to make repairs, restore or alter the common properties in the event of damage or destruction, and to borrow money and open bank accounts on behalf of the Association. The Board also has the power to collect delinquent assessments, abate nuisances, and seek damages from members who violate rules and regulations. They are authorized to create and amend reasonable rules and regulations, which become binding upon members of the Association once approved in writing and delivered to each member. Additionally, they can employ workmen, contractors, and supervisory personnel, and purchase supplies and equipment necessary for the maintenance of the community. The Board is authorized to bring and defend actions by or against multiple members and assess the cost of such litigation to the members. The Board can also hire a Managing Agent to perform and exercise the powers of the Board of Directors in the management of the community. *See* Bylaws, Art. V, Sec. 5.

² For instance, the Board's power to determine and levy assessments is directly related to their fiduciary duty to ensure that the community is properly maintained and that common properties are kept in good condition. Similarly, the Board's power to collect delinquent assessments and enforce rules and regulations is intended to protect the financial well-being of the Association and its members. The Board's power to make reasonable rules and regulations is also

22. Capielo as Vice President had the following duties and powers designated to her:

Section 6. The Vice President.

The Vice President shall take the place of the President and perform his duties whenever the President shall be absent or unable to act and shall have such other powers and duties as are usually vested in the office of Vice President of a corporation organized not-for-profit under Chapter 617, Florida Statutes, as amended.

See Bylaws, Art. V, Sec. 6.

23. Kopec as Secretary had the following duties and powers designated to her:

Section 7. The Secretary.

The Secretary and/or Assistant Secretary shall attend all sessions of the Board and all meetings of Association Members and record all votes and the minutes of all proceedings in a book to be kept for that purpose and shall perform like duties for the standing committees when required. He shall give or cause to be given, notice of all meetings of Association Members and special meetings of the Board and shall perform such other duties as may be prescribed by the Board of Directors or by the President, under whose supervision he shall be.

See Bylaws, Art. V, Sec. 7.

24. Maceda as the Treasurer had the following duties and powers designated to her.

Section 8. The Treasurer.

The Treasurer shall have the custody of the Association funds and securities and shall keep full and accurate chronological accounts of receipts and disbursements in books belonging to the Association including the vouchers for such disbursements and shall deposit all monies and other valuable effects in the name and to the credit of the Association in such depositories as may be designated by the Board. These duties may also be exercised by

linked to their fiduciary duty, as it enables them to establish guidelines that promote the safety, well-being, and financial stability of the community. *See* Bylaws, Art. V, Sec. 5.

a Managing Agent, if any, appointed by the Board.

He shall disburse the funds of the Association as he may be ordered by the Board, making proper vouchers for such disbursements and shall render to the President and Directors, at the regular meeting of the Board or whenever they may require it, an account of all his transactions as Treasurer and of the financial condition of the Association.

He shall keep detailed financial records and books of account of the Association, including a separate account for each Member which, among other things, shall contain the amount of each Assessment, the date when due, the amount paid thereon and the balance remaining unpaid.

See Bylaws, Art. V, Sec. 8.

25. During the time periods material to this Complaint, the Defendants were officers and directors of the Association and, as such, owed the Association a fiduciary duty to discharge their duties in good faith, with the care an ordinarily prudent officer, director or manager in a like position would exercise and in a manner reasonably believed to be in the best interests of the Association.

Fiduciary Duties Under Florida Law

26. Specifically, the duty of loyalty and good faith under Florida law required the Defendants to put the interests of the Association above their own interests and those of others and was not limited to disloyalty in the classic sense, *i.e.*, self-dealing, personal gain, or a cognizable conflict of interest. In addition, in discharging their duty of loyalty and good faith, the Defendants were required to act in good faith, and would be in breach of the duty of loyalty by acting with a purpose other than that of advancing the best interests of the Association, and by acting in violation of applicable positive law, or by failing to act in the face of a known duty to act, thereby demonstrating a conscious disregard for their responsibilities. The Defendants were also required to ensure that they did not display a lack of diligence that was more culpable than simple

inattention or failure to be informed of all facts material to their decisions, such that their lack of diligence was qualitatively more culpable than gross negligence.

27. Additionally, the duty to exercise due care under Florida law required the Defendants to use that amount of care which ordinarily careful and prudent persons would use in similar circumstances and to consider all material information reasonably available. In exercising the duty of due care, the Defendants could not engage in acts or omissions on behalf of the Association that would result in a loss to the Association arising from decisions that: (i) were ill-advised, uninformed or that failed to consider material information; (ii) constituted an unconsidered failure to act in circumstances in which due attention would, arguably, have prevented the loss; (iii) were based upon an unintelligent or unadvised judgment; (iv) were grossly negligent, such as engaging in an irrational decision making process signifying more than ordinary inadvertence or inattention; or (v) resulted in a corporate strategy that reflected an indifference to the potential risk of harm to the Association, such that reasonable businesspersons would have carefully considered the obvious negative consequences. Moreover, under Florida law, the more significant the subject matter of the decision, the greater is the requirement to probe and consider alternatives. To further satisfy the duty of due care, a reasonable and informed deliberative process was required by attending meetings, asking questions, reviewing written materials, and otherwise becoming informed of relevant and reasonably available information, and to seek the input of experts, such as attorneys and accountants, to provide materially accurate information.

28. In addition, under Florida law, the Defendants' liability cannot be limited: (i) for any breach of their duty of loyalty; (ii) for acts or omissions not in good faith or which involve willful misconduct, gross negligence or a misconduct or a knowing violation of law; (iii) for any transaction from which Defendants derived an improper personal benefit; and/or (iv) for any act

or omission that constitutes a bad faith violation of the implied contractual covenant of good faith and fair dealing. Finally, Defendants could not act loyally towards the Association unless they acted in the good faith belief that their actions were in the Association's best interest.

Defendants' Breaches of Fiduciary Duties

29. Throughout the relevant time period, Defendants, as officers and/or members of the board of the Association, exhibited a negligent, or reckless disregard for the best interests of the Association and, except for their, negligent, grossly negligent or reckless disregard of the facts, they should have known of the risk of damage that ultimately befell the Association.

30. Defendants actively abdicated their fiduciary duties of due care, good faith, and loyalty to the Association, which breaches include, but may not necessarily be limited to, the following:

- (i) Affirmatively creating and/or permitting the disseminating of materially inaccurate, defective, or fundamentally flawed business, operational, financial and regulatory information internally, to other third parties, and to the public and/or otherwise failing to disclose material negative information about the Association;
- (ii) Acting, or failing to act, in conscious disregard for their fiduciary duties of care to act in the best interests of the Association;
- (iii) Acting, or failing to act, in furtherance of the interests of insiders or others, rather than to further the interests of, and to the detriment of, the Association;
- (iv) Suppressing or permitting the suppression of the true, critically impaired financial, business, and operational condition of the Association;
- (v) Causing or permitting the Association to make certain transfers that are avoidable under applicable Florida law;

- (vi) Failing to fully or adequately inform themselves in regard to material business, operational, regulatory, and financial decisions and functions affecting the Association;
- (vii) Causing or permitting improper payment of excessive compensation to employees, vendors and professionals, including to insiders of the Association;
- (viii) Failing to discover or prevent other former board members' misappropriation of Association funds and/or use for personal gain;
- (ix) Failing to maintain common areas and amenities, and/or providing subpar maintenance of the Association's property;
- (x) Failing to disclose important information to homeowners, such as financial statements, meeting minutes, and/or proposed changes to the election procedures and governing documents;
- (xi) Engaging in conflicts of interest, such as awarding contracts or benefits to board members, their family members, and/or their businesses;
- (xii) Failing to follow proper procedures for elections or meetings, and/or failing to give adequate notice to homeowners of important events or decisions which permitted bad actors to remain in control;
- (xiii) Ignoring or delaying homeowners' requests for assistance or action regarding community issues, including allegations of theft and mismanagement by other former board members;
- (xiv) Refusing to listen to homeowners' concerns or suggestions, and/or failing to communicate with homeowners in a timely and effective manner; and
- (xv) Other breaches that proximately caused damages as may be ascertained through

discovery.

31. Defendants actions resulting in breaches of fiduciary duties primarily stem from allowing or failing to stop the ongoing misappropriation of funds by former board members, including: (i) improper payments to insiders, *i.e.*, family members of board members, posing as employees of the Association despite not providing services to the Association; (ii) improper payments to false vendors, *i.e.*, vendors, many of which were related to, owned by, or affiliated with board members, paid inflated service rates without providing services or the contracted for services and often without supporting invoices; (iii) improper payments to criminal defense counsel whose primary purpose was to thwart the investigation of theft of Association monies by board members; and (iv) retention of and payment to conflicted counsel to defend both Gallego and the Association in a Bankruptcy proceeding of two homeowners in which contempt liability and sanctions were sought and imposed against Gallego and the Association based on misconduct of Gallego outside the scope of her duties as the Association's President.

I. The Kickback Scheme and Personal Use of Association Monies and Property

32. From 2019 to 2022, while Defendant Maceda was a Director and Treasurer for the Association, former board members Gallego, Ghilardi, Rodgers, and Lopez Garcia were engaged in a kickback scheme and theft of Association monies using a variety of methods as detailed in the Affidavit in Support of Arrest leading to their arrest and indictment for theft of Association monies. As part of the kickback scheme, the criminal defendant former board members engaged in over payment of related employees and vendors who then paid them back a portion of the overpayment in cash, as described below.

33. As part of the kickback scheme, former non Defendant board members also misappropriated Association monies for personal use, including paying for dining and

entertainment expenses, fuel for personal vehicles, and utility bills at the personal residences of board members, their relatives, and other insiders. Payments for these personal expenses were made through automatic ACH debit by the utility companies from the Association's bank account and with credit cards in the Association's name. There was no legitimate basis for the Association to pay those personal expenses for board members and other insiders. Former board members also used vehicles owned by the Association for personal use, driving the vehicles even when they were not on Association business, requiring the Association to purchase and insure several more automobiles than were necessary for the operation of the Association. This depletion of Association monies and property for personal use caused significant losses to the Association rendering it nearly insolvent, requiring it to borrow funds, to raise member fees, and to levy assessments against homeowners.

34. This scheme was ongoing from at least 2019 through 2022 while at least one or all Defendants served as officers and/or directors on the board of the Association and was specifically carried out as follows:

(i) Improper Payments to Insiders Disguised as Employees of the Association

35. Specifically, Defendants allowed and/or participated in causing the Association to employ and pay certain insiders of former board members as employees of the Association. Those insiders were paid inflated salaries without providing the bargained for services to the Association because they were relatives or friends of the former board members that have been criminally charged with theft from the Association. Certain of those insiders were also allegedly participating in a kickback scheme with former nondefendant board members. The salaries paid to those insiders totaled at least \$1,678,536.69 for the period from 2019 to 2022. Defendant Maceda, in particular, was a Director and/or Treasurer of the Association, responsible for reviewing and

approving payroll and outgoing transfers from the Association, during the entire time that the insiders were improperly on the Association's payroll.

(ii) Improper Payments to False, Insider, and/or Overcharging Vendors

36. During the year 2022, when all Defendants were board members of the Association, Defendants caused the Association to retain and pay or failed to stop or prevent the payments to certain vendors that were related to and/or otherwise insiders of former board members even if they charged above market rate fees for services and/or failed to render the promised services.

37. In addition to the damages caused by all Defendants as board members alleged above, Defendant Maceda, who served as Treasurer and/or Director and was a signatory on Association accounts from 2017 to 2022, engaged in breaches of fiduciary duty throughout her time on the board, from at least 2019 to 2022 that caused damages to the Association. Specifically, Defendant Maceda approved the retention of and/or payment of invoices for various vendors, against the best interest of the Association, as detailed below.

38. In fact, all Defendants, during the respective time periods they each served as board members for the Association, approved the retention of and/or payment of invoices for the following vendors, against the best interest of the Association:

- a. Coco Tree Service to perform tree trimming and landscaping services. This vendor (i) did not provide most of the services for which the Association paid and many of the services it was supposed to provide were provided by other landscaping vendors, (ii) did not provide sufficient supporting invoices to the Association considering the significant amount it was paid, (iii) cashed all Association payment checks at a check cashing store, and (iv) increased its contract amounts by more than three times from 2021 to 2022, yet it received from the Association improper

and excessive payments in the amounts of \$157,750.00 in 2019, \$207,454.00 in 2020, \$101,96.00 in 2021, and \$1,011,940.86 in 2022;

- b. Alibri Consulting, LLC to inspect and supervise all areas to prevent accidents or potential liabilities and to make reports concerning potential liabilities. The owner of this company is Ghilardi's husband, Dante Chauca. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Association payments in the amounts \$10,158.00 in 2019, \$89,393.39 in 2020, and \$192,130.00 in 2021;
- c. Excellent Services & Work, LLC a/k/a Excellent Work & Services, LLC to install cameras in various areas. The owner of this company is Gallego's husband, Jose Antonio Gonzalez. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Association improper payments in the amounts of \$227,500.00 in 2019, \$300,714.00 in 2020, \$186,409.15 in 2021, and \$161,094.03 in 2022;
- d. Paradisos Disinfectant, LLC for pressure cleaning and disinfecting all common areas due to Covid-19. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Association payments in the amounts of \$11,616.00 in 2019, \$57,878.20 in 2020, and \$87,578.60 in 2022. The owner of this vendor is Ovidio Chaviano who was also on the Association's payroll. Defendant Macedo abstained from the vote to approve this vendor but took no action to prevent the payments to this vendor;
- e. Cima Solutions, Inc. to perform service and repairs for vandalism and destruction of property. The owner of this company is Gallego's husband, Jose Antonio

- Gonzalez. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Association payments in the amounts of \$15,000.00 in 2019, \$13,473.13 in 2020, and \$72,059.13 in 2022;
- f. Compu Fix to provide technology services for remote work, zoom meetings, zoom communications with lawyers and employees, remote services with the owners, drone services to monitor lake areas for social distances and vandalism, and training employees how to use the new technology. This vendor did not provide the services for which the Association paid and did not provide sufficient supporting invoices to the Association considering the significant amount it was paid, yet it received from the Association payments in the amounts of \$155,087.80 in 2019, \$141,280.00 in 2020, \$175,885.00 in 2021, and \$446,889.00 in 2022;
 - g. Worldwide Business Solutions. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Associations payments in the amounts of \$102,000.00 in 2019, \$120,000.00 in 2020, \$120,000.00 in 2021, and \$285,000.00 in 2022;
 - h. A&F Management of Florida I. This vendor did not provide most of the services for which the Association paid and many of the services it was supposed to provide were provided by other landscaping vendors, and did not provide sufficient supporting invoices to the Association considering the significant amount it was paid, yet it received from the Association payments in the amounts of \$27,000.00 in 2019, \$142,108.00 in 2020, \$145,700.00 in 2021, and \$262,400.00 in 2022;
 - i. Three Brothers to perform general labor to replace employees that have a medical condition and cannot perform their regular job duties. This vendor did not provide

most of the services for which the Association paid and many of the services it was supposed to provide were provided by other repair and maintenance vendors, and did not provide sufficient supporting invoices to the Association considering the significant amount it was paid, yet it received from the Association payments in the amounts of \$187,247.55 in 2019, \$195,453.00 in 2020, \$328,350.85 in 2021, and \$1,183,214.00 in 2022;

- j. Raul H. Gonzalez Cortina / Off Duty Services of Sofl, LLC to provide private security at the home of former board member, Gallego. This vendor was providing 24-hour private security to Gallego after she was arrested in 2021 for theft of funds from the Association. This security did not benefit the Association in any way, yet it received from the Association payments in the amounts of \$13,300.00 in 2019, \$54,850.00 in 2020, \$618,700.00 in 2021, and \$279,133.00 in 2022;
- k. Deco Enterprises Inc. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Association payment in the amount of \$171,915.62 in 2022, during the time all Defendants served as officers and directors on the board;
- l. Jugys Cleaning Services to provide disinfection services in various areas. This vendor is owned by Eugenio E. Fondon, who is affiliated with Robert Trueba as the President of Trueba Cleaning Services, Inc. Trueba admitted to being engaged in a cash back scheme misappropriating the Association's funds with criminal defendant Gallego. This vendor did not provide the contracted for services to the Association and did not provide supporting invoices to the Association, yet it received from the Association payment in the amount of \$175,496.19 in 2022,

- during the time all Defendants served as officers and directors on the board;
- m. Endlessly Handy to provide repair services. This vendor is owned by Eugenio E. Fondon, who is affiliated with Robert Trueba as the President of Trueba Cleaning Services, Inc. Trueba admitted to being engaged in a cash back scheme misappropriating the Association's funds with Gallego. This vendor did not provide the contracted for services to the Association and did not provide supporting invoices to the Association, yet it received from the Association payments in the amounts of \$55,487.82 in 2021 and \$247,560.46 in 2022;
 - n. Aya Services & Repair Corp. to perform general labor and repairs. The owner of this company is former nondefendant board member Lopez's husband. This vendor did not provide services to the Association and did not provide invoices to the Association, yet it received from the Association payments in the amounts of \$46,146.00 in 2019, \$74,792.00 in 2020, and \$28,630.24 in 2021, during the time Defendant Maceda served as Treasurer, Director and/or bank account signatory from 2019 to 2021;
 - o. Bartolo Body Shop Corp. This company did not perform the services for which it was paid by the Association and participated in a cash back scheme with the knowing participation of certain former board members to take funds from the Association. Despite not rendering the services or providing supporting invoices to the Association, this vendor received from the Association payments in the amounts of \$107,237.32 in 2019, \$67,679.20 in 2020, and \$9,865.85 in 2021, during the time Defendant Maceda served as Treasurer, Director and/or bank account signatory from 2019 to 2021;

- p. Okeechobee Auto & Boat Restoration to perform repairs. The owner of this company Robert Trueba has admitted that this company did not perform the services for which paid by the Association and that it participated in a cash back scheme with the knowing participation of certain former board members to take funds from the Association. Despite not rendering the services or providing supporting invoices to the Association, this vendor received from the Association payments in the amounts of \$292,000.00 in 2019, \$292,518.01 in 2020, and \$15,000.00 in 2021, during the time Defendant Maceda served as Treasurer, Director and/or bank account signatory from 2019 to 2021; and
- q. Nikita Trade Equipment International to rent equipment to perform repairs. The owner of this company Robert Trueba has admitted that this company did not perform the services for which it was paid by the Association and that it participated in a cash back scheme with the knowing participation of certain former board members to take funds from the Association. Despite not rendering the services or providing supporting invoices to the Association, this vendor received from the Association payment in the amount of \$34,950.00 in 2019, during the time Defendant Maceda served as Treasurer, Director and/or bank account signatory in 2019.

39. Defendants, in their roles as officers and directors for the Association, had a duty to review the contracts with, invoices from, and services performed by the above-listed vendors prior to directly or indirectly allowing the Association to pay those vendors. Instead, Defendants permitted or affirmatively approved those vendor's contracts and invoices and allowed the Association to pay those vendors inflated rates whether or not they provided services or otherwise

fulfilled their contractual obligations to the Association. Defendants did not properly supervise or even inquire as to whether the invoiced services were actually performed, thereby allowing the improper depletion of Association funds and breaching their fiduciary duties to the Association.

40. The Association improperly paid the above-listed vendors amounts totaling at least \$ 8,953,385.50 from 2019 to 2022 and \$4,576,410.89 in 2022 alone.

(iii) Improper Payment of Legal Fees Against the Interests of the Association

41. From 2019 to 2022, Defendants affirmatively approved or permitted the payments of Association funds to criminal defense attorneys to defend former board member Gallego in the criminal action brought against her for theft of Association monies. This representation was not only intended to defend Gallego so she could get away with theft of the Association's monies but also intended to prevent the State Attorney's Office from obtaining through various subpoenas Association records and hampering its investigation of ongoing theft of Association funds. Defendants were aware of the nature of criminal defense counsel's legal representation and had all of the information necessary to determine that those legal services were in a direct conflict of interest with the Association. Despite such knowledge, from 2019 to 2021 Defendant Maceda caused the Association to pay legal fees against its own interests, and in 2022 all Defendants caused the Association to pay legal fees against its own interests, as follows:

- a. From 2019 to 2022, Defendants approved the retention and/or payments totaling \$257,237 to Alfaro & Fernandez, P.A., the attorney that represented the Association in connection with the Association's repeated non-responsiveness to government subpoenas in connection with investigating theft of the Association monies;
- b. From 2019 to 2022, Defendants approved the retention and/or payments totaling \$1,295,000 to Hilton Napoleon, II P.A. for legal services to defeat the criminal

- charges brought against Gallego for theft of Association monies and represent the Association to resist the State Attorneys' investigation;
- c. From 2019 to 2022, Defendants approved the retention and/or payments totaling \$475,000 to Gallego's personal criminal defense counsel Juaregui Law for legal services to defeat the criminal charges brought against Gallego for theft of Association monies;
 - d. From 2019 to 2022, Defendants approved the retention and/or payments totaling \$227,037 to Rasco, Klock, Perez & Nieto P.A. for legal services to resist the State Attorneys Office investigation and otherwise resist a proper election which would remove the controlling Board of Directors members;
 - e. From 2021 to 2022, Defendants approved the retention and/or payments totaling \$180,000 to criminal defense counsel Ricardo Hermida Law Office for legal services to defeat the criminal charges brought against Gallego for theft of Association monies;
 - f. In 2022, Defendants approved the retention and/or payments totaling \$100,000 to elections counsel at John Paul Arcia, P.A. to assist them in retaining their improperly gained positions on the Association's board without complying the proper election procedures; and
 - g. From 2019 to 2022, Defendants approved the retention of attorney Daniel Izquierdo as an employee on the Association's payroll, paying him \$127,683.75 in wages. Mr. Izquierdo was retained as an employee by the former board members that were trying to hide their theft of Association monies and his primary role was to thwart the State Attorney's Office's investigation of the ongoing theft of the Association

monies. From 2019 to 2022, Defendants failed to investigate the basis for Mr. Izquierdo's retention as an employee or to review the nature of the legal services he provided. Defendants also allowed and/or failed to prevent other former board members from using the Association's funds to pay for Mr. Izquierdo's legal services, which were against the best interests of the Association.

(iv) Improper Retention of Conflicted Counsel in Cepero Bankruptcy Matter

42. From 2020 to 2022, Defendants approved the retention of and payments totaling \$122,585.00 to bankruptcy attorney Michael Parlade to represent Gallego and the Association in contempt proceedings brought by homeowners Josue and Leticia Cepero for misconduct of Gallego including violations of the automatic stay in their joint bankruptcy case.

43. The Ceperos' contempt proceedings resulted in a judgment (the "Cepero Judgment") entered against the Association and former board member Gallego for \$288,437.60 (including \$25,000 in compensatory damages, \$83,190.00 in punitive damages, and the remainder in attorneys' fees) following evidentiary hearings on the motions for contempt. The basis of those motions was alleged harassment of the Ceperos by Gallego while she was President of the Association, though acting outside the scope of that position. Gallego was found liable for multiple violations of the Bankruptcy Court's orders entered as a result of Gallego's harassment of the Ceperos and violations of the automatic stay, and the Association was found directly liable for her conduct as its former President. At that time, Gallego was improperly using the Association to harass homeowners and to carry out a kickback scheme that was against the Association's best interest. In fact, during that time, Gallego was arrested for theft of the Association's funds.

44. Nevertheless, the Association's board paid bankruptcy attorney Michael Parlade to represent both Gallego and the Association in the contempt proceedings. Mr. Parlade had a clear

conflict of interest in representing both Gallego and the Association. In fact, when Gallego was found to be in contempt for violations of the Bankruptcy Court's orders and the automatic stay, and emotional distress and punitive damages were awarded to the Ceperos, Mr. Parlade agreed with opposing counsel that the Ceperos would only seek to recover the damages awarded from the Association and not from Ms. Gallego.

45. Despite the conflict of interest and damage caused to the Association, Defendant Maceda approved and paid his invoices. Defendant Maceda failed to investigate Mr. Parlade's conflict of interest and failed to attempt to stop him from acting against the interests of the Association and in favor of Gallego. As a result, the judgment for \$288,437.60 was awarded in favor of the Ceperos and against the Association. Those damages remain an outstanding liability for the Association.

46. Each of the above breaches of fiduciary duty by Defendants adversely impacted and conferred no benefit to the Association, and directly and proximately caused damage to the Association consisting of, *inter alia*, those damages alleged above.

II. Failure to Comply with Corporate Formalities in Governing Documents

47. In addition to allowing the improper depletion of Association monies, Defendants failed to follow the procedures for recording meeting minutes under the Association's Bylaws. Specifically, Maceda failed to keep or require the Secretary to keep meeting minutes for the meetings held on January 25, 2017, March 13, 2017, March 13, 2018, March 26, 2020, August 31, 2020, September 4, 2020, and January 6, 2021.

48. The board's meeting minutes lack detail and exclude topics of conversation such as budget discussions that were carried out at the meetings but not recorded in the minutes. In particular, the board failed to record the budget meeting minutes on September 4, 2020, and the

board failed to record the names of vendors retained, which later charged inflated rates to the Association. This failure to comply with the required corporate formalities constitutes a breach of fiduciary duty by Defendant Maceda.

49. According to the meeting minutes recording all board members in attendance, Defendant Maceda failed to appear at the 2018 and 2019 meetings despite being a Director and the Treasurer of the Association at that time.

50. Defendants also failed to prevent and/or stop the suppression of the 2022 board election, which then resulted in the appointment of Defendants to the 2022 board without being elected by the homeowners. As the January 3, 2022 meeting minutes reflect, the improperly conducted election allowed for the improperly appointed 2022 board, on which all of the Defendants served. Specifically, the election was improperly conducted, in violation of Article V, Section 2 of the Bylaws, because access to the election was severely limited by only allowing a couple of homeowners at a time to enter the polling place under the guise of Covid-19 protections. Then, a false bomb threat was called into the polling place resulting in evacuation of the polls and cancellation of the election. The board including Defendants were then named to the 2022 board without being elected by a majority of the homeowners as required by the Governing Documents. Defendants continued to serve on the board despite the fact that they were not properly elected, which they knew or should have known. By serving in those board positions, rather than correcting the improper election, they continued to breach their fiduciary duties to the Association.

51. Defendants attended the budget meeting on January 27, 2022, at which the 2022 Budget was discussed as well as the reasons for the increase in Association fees. Defendants approved the 2022 Budget without questioning or investigating why the steep increase in expenses resulting from vendors, many of whom are related to former board members, that were charging

the Association above market rate fees for their services for maintenance of the property and lake, repairs, landscaping, tree trimming, technology support, cleaning, personal security, and other services, which were often not being rendered as promised, not being rendered at all, or rendered in direct opposition to the best interests of the Association. Defendants knew or should have had knowledge that those services were not being rendered or were being over charged because homeowners had been complaining about the lack of services for more than one year.

52. The Board likewise failed to require audits which were required by Florida Statutes Chapter 720 and not performed since 2018.

53. As a direct and proximate result of the breach of duty of care committed by the Defendants described above, the Association has suffered damages that include but are not necessarily limited to: (i) waste, loss, and depletion of the Association's funds through retention of and payments and over-payments to vendors and employees that did not perform the contracted for services, provide services of equivalent value, or provide supporting invoices to the Association; (ii) waste, loss, and depletion of the Association's funds through payments to criminal defense counsel for Gallego who was charged with theft of Association funds to forestall the investigations of the State Attorney's Office and payments to other counsel who were conflicted between representation of board members and the Association such that they did not represent the Association's best interest; (iii) waste, loss, and depletion of the Association's assets through board members' and employees' improper use of such assets such as vehicles; (iv) deterioration of grounds and buildings requiring expensive remedial repair (v) the increased liabilities of the Association resulting from the Cepero Action and the Danton Action and the expenses of the receivership; (vi) the decrease in value of the Association and its assets resulting from the prolonged mismanagement of the Association's operations and funds, and the lack of care of the

property of the Association; (vii) the value of all transfers authorized or permitted by Defendants that are avoidable under applicable Florida law; and (viii) other damages as may be ascertained through discovery.

54. All conditions precedent to the filing of this action have been performed, waived, satisfied, or have otherwise occurred.

COUNT I
BREACH OF FIDUCIARY DUTY
AGAINST THE DEFENDANTS

55. Plaintiff re-alleges and incorporates herein the allegations set forth in paragraphs 1 through 54.

56. This is a claim under Florida statutory and common law, and/or under other applicable law, for breach of fiduciary duty by the Receiver against the Defendants based upon their acts and omissions as officers and directors of the Association.

57. During at least the time periods alleged above, the Defendants were officers and directors of the Association and, as such, owed the Association a fiduciary duty to discharge their duties in good faith, with the care an ordinarily prudent officer, director or manager in a like position would exercise and in a manner reasonably believed to be in the best interests of the Association.

58. The duty to exercise due care under Florida law required the Defendants to use that amount of care which ordinarily careful and prudent persons would use in similar circumstances and to consider all material information reasonably available. In exercising the duty of due care, the Defendants could not engage in acts or omissions on behalf of the Association that would result in a loss to the Association arising from decisions that: (i) were ill-advised, uninformed or that failed to consider material information; (ii) constituted an unconsidered failure to act in

circumstances in which due attention would, arguably, have prevented the loss; (iii) were based upon an unintelligent or unadvised judgment; (iv) were negligent or grossly negligent, such as engaging in an irrational decision making process signifying more than ordinary inadvertence or inattention; or (v) resulted in a corporate strategy that reflected an indifference to the potential risk of harm to the Association, such that reasonable businesspersons would have carefully considered the obvious negative consequences. Moreover, under Florida law, the more significant the subject matter of the decision, the greater is the requirement to probe and consider alternatives. To further satisfy the duty of due care, a reasonable and informed deliberative process was required by attending meetings, asking questions, reviewing written materials, and otherwise becoming informed of relevant and reasonably available information, and to seek the input of experts, such as investment bankers, attorneys, and accountants, and to provide materially accurate information.

59. In regard to the facts alleged above, Defendants exhibited a grossly negligent, or reckless disregard for the best interests of the Association and, except for their knowing, conscious, grossly negligent, reckless or conscious disregard of the facts, they should have known of the risk of damage that ultimately befell the Association.

60. Specifically, the Defendants engaged in and otherwise abdicated their fiduciary duties of loyalty, good faith, and due care owed to the Association, with breaches that include, but may not necessarily be limited to, the following:

- (i) Permitting the creation of and/or disseminating materially inaccurate, defective, or fundamentally flawed business, operational, financial, and regulatory information internally, to third parties, and to the public, allowing counsel to conceal and thwart the investigation of the theft of Association monies by other board members, and/or otherwise failing to disclose material negative information about the Association;

- (ii) acting or failing to act in conscious disregard for their fiduciary duties and the best interests of the Association;
- (iii) failing to act in the best interest of the Association;
- (iv) ignoring or suppressing the true, critically impaired financial, business, and operational condition of the Association, which allowed the Association to continue to operate well past the point of insolvency causing substantial harm and damage to the Association by failing to keep proper meeting minutes and to disclose the proposed 2022 budget as required by the Bylaws;
- (v) causing or permitting the Association to engage in certain transfers to employees, professionals, and vendors that are avoidable under applicable Florida law;
- (vi) failing to fully or adequately inform themselves in regard to material business, operational, regulatory, and financial decisions and functions affecting the Association concerning the management of the Association and its finances, thereby allowing former board members to carry out a kickback scheme and allowing the Association's conflicted counsel to work against the Association to have it held liable for the Cepero Judgment, all while Defendants served as board members of the Association;
- (vii) permitting the Association to operate without current annual financial audits since 2018;
- (viii) causing or permitting improper payment of excessive compensation to employees, professionals and vendors, including to insiders of the Association;
- (ix) causing or permitting the false and improper appointment of the board of directors at the 2022 election;

- (x) failing to provide a copy of the proposed 2022 budget as required by the Governing Documents;
- (xi) failing to create and maintain appropriate board minutes and required financial records for inspection by homeowners; and
- (xii) other breaches and proximately caused damages as may be ascertained through discovery.

61. Each of the above breaches adversely impacted and conferred no benefit to the Association, and directly and proximately caused damage to the Association consisting of, among other things, the improper payments to employees, vendors, and professionals and the kickback scheme alleged above and the administrative expenses of the receivership required to take control of the Association from Defendants and to operate, restore, and preserve the Association in accordance with the Circuit Court's orders in the Danton Action.

WHEREFORE, the Receiver demands the entry of judgment against the Defendants for compensatory damages and consequential damages, including, but not limited to: (i) the decrease in the value of the Association and its assets; (ii) the waste, loss, and depletion of Association funds and other material assets resulting from, among other things, the improper payments to vendors, employees, and professionals; (iii) the increase in the Association's liabilities, including without limitation the Cepero Judgment; (iv) the Association's costs resulting from the Danton Action; (v) administrative fees and expenses incurred by Association and the receivership estate in connection with the receivership; (vi) other damages as may be ascertained or proven through discovery, plus pre-judgment and post-judgment interest and costs, and for any other relief the Court deems appropriate.

DEMAND FOR JURY TRIAL

The Receiver hereby demands a trial by jury on all claims and issues triable by such.

Dated this 20th day of April 2023.

Respectfully submitted,

DAMIAN | VALORI | CULMO
*Counsel for Court-Appointed Receiver,
The Honorable David M. Gersten (Ret.)*
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By: /s/ Thomas A. Culmo

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Florida Bar No. 1025060

COMPOSITE
EXHIBIT 2

GORDON&REES

SCULLY MANSUKHANI

YOUR 50 STATE PARTNER*

1111 Broadway, Suite 1700

Oakland, California 94607

(510) 463-8600

Tax ID: 94-1617026

David Gersten
Judge Beatrice Butchko
100 SE Second Street, Suite 3900
Miami, FL 33131
dgersten@grsm.com

April 19, 2023
ID: GERSP 1292668
Invoice No. 21298801
Gersten, David M.

RE: Danton v. Hammocks Community Association

BILLING SUMMARY THROUGH March 15, 2023

Fees For Professional Services:	\$112,575.00
LESS DISCOUNT	-\$7,880.25
Total for Professional Services:	\$104,694.75
Expenses and Advances:	<u>\$51.24</u>
Current Bill:	\$104,745.99

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 5% (five percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
02/15/23	Review and respond to Edward Makaron email re: work done .1; review and respond to Melanie Damian email re: candidates .1; review and respond to Melanie Damian email re: sign claim .1; review and respond to Russell Landy email re: court hearing .1; email to Melanie Damian and Russell Landy re: lease .1; review and edit current draft of reply to response in Cepero case 3.2 ; review and respond to Michael Kaufman email re: affidavit .1; review and approve of multiple bills to be paid .1; send email to Melanie Damian, Steve Katz and Jesmany Jomarron re: election .1; review and respond to Steve Katz email re: election conference .1; review and respond to Melanie Damian email re: selection conference .1; review and respond to Michael Kaufman email re: candidates .1; conference with Andrew Weiner and Russell Landy re: open and closed issues since last conference (to do list) 1.0; review and approve invoices .2; review and forward storage space email .1; review and respond to email(s) from extra storage unit re: payments .1; review and respond to Andrew Weiner email re: list of items both open and closed .2; conference with Melanie Damian (left mid-stream), Steve Katz and Jesmany Jomarron re: election protocols and steps going forward including qualifications per statute, candidate interviews, timing an bulletproof ballots to avoid irregularities 2.0; review and respond to Russell Landy email re: stolen vehicle report .1; and review and respond to Andrew Weiner email and content re	DMG2	8.20
02/16/23	Conference with Jesmany Jomarron re: election procedures and template for candidate interview, questions and other materials to obtain from candidates 1.1; review potential website system for calendaring .1; review and respond to Melanie Damian email re: candidate list .1; review and respond to Eric Thompson email re: insurance claim .1; review and respond to Melanie Damian email re: beach restoration .1; continued revisions and editing of Cepero reply 1.8 ; review and respond to Eric Thompson email(s) re: extension .1; review and respond to Jesmany Jomarron email re: calendar invite proposed language .2; review Michael Kaufman email re: Joel Aresty letter and forward to Eric Thompson and Jesmany Jomarron .2; review and respond to Russell Landy email re: front entrance .1; review and respond to Melanie Damian email re: conference with Jesmany .1; review and respond to Mary Dhanji email re: approval to view .1; email to Ken Murante re: Cepero filing .1; review and respond to Andrew Weiner email re: boat storage issues .3; and review and respond to Adam Ruff email re: J.P. Morgan case .1	DMG2	4.60
02/16/23	Research on title, lien, court filings, public records, and corporate	KAG1	2.60

records of Christina at the Hammocks subdivision, #24-34 in the neighborhood owners list of property appraiser.

02/16/23	Research on title, liens, court filings, public records, and corporate records when appropriate of Christina at the Hammocks subdivision in search of inappropriate conducts by Hammocks Board.	KAG1	0.60
02/16/23	Receive review and analyze email from K Godwin regarding collection and documentation of potential bar claim evidence connection with a suit. Alfaro filed against a hammocks tenant for eviction due to noise complaints	RHS1	0.10
02/16/23	Receive email from M. Aron regarding counsel for Biscayne Beach Club emailing her on the three cases pending against Biscayne Beach; draft and send response, asking her to get more information and circle back as to Hammocks position, setting aside the consent judgment	RHS1	0.20
02/16/23	Receive and review Case Management Order entered on Hammocks v. Sui, Case No.: 2022-019397-CA01; confirm 60-day entered on case; draft and send email to A. Ruff with both the order granting stay and CMC for calendaring on the date of expiration of the stay	RHS1	0.20
02/16/23	Receive response from Allen Katz advising that he will object to our Motion for Stay and to coordinate with his office	RHS1	0.10
02/16/23	Receive email from D. Gersten and draft and send case update response attaching last email thread on JPMorgan Chase v. Grimm, Case No.:19-321398	RHS1	0.20
02/16/23	Draft Aranciba to answer discovery; draft and send email to Allen Katz advising that his idea for a stay as to only the FJ of foreclosure, sale, disbursement of proceeds was thoroughly considered but the Receiver concluded a stay as the action for 60 days was the route he wishes to take	RHS1	0.70
02/16/23	Research and review Florida PFS, Offer of Judgment and Demand for Judgment statute regarding limiting Hammocks exposure to attorneys fees in cases where Hammocks filed actions with Gallego	RHS1	0.20
02/16/23	Draft and send email to E. Thompson with result of research and review Florida PFS, Offer of Judgment and Demand and recommendation that we file a PFS before dismissing	RHS1	0.20
02/16/23	Receive and respond to email from Plaintiff's counsel Matthew Flicker on Defendant Grimms motion and that Hammocks won't need a stay beyond 4/12/2023 hearing date if all financials are completed, JPMorgan Chase v. Grimm, Case No.: 19-321398	RHS1	0.10

02/16/23	Continue review and analysis of additional 23 files and 112 documents produced by Andrew Centraro in support of his claims to legal fees owed in connection with Receiver's analysis of claim	RHS1	1.40
02/16/23	Detailed review, notation and tally of fines charged to homeowners, and total of all fines that exceed \$500 per citation for notation in whether the fines were appropriate or exorbitant in connection with analysis of Sarmina Centraro Law Firm invoices for report to Judge Gersten	RHS1	1.20
02/16/23	Email correspondence with forensic accountant (Melissa Davis of Kapila Mukamal) regarding additional update as to status of their analysis (needed to draft Supplemental Report, as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.10
02/16/23	Analyze 2/16/23 correspondence from Joel Aresty, Esq. regarding bankruptcy of homeowner Ana Danton as related to Ms. Danton's candidacy for the Board of Directors, 2 pages (as requested by D. Gersten)	ERT	0.10
02/16/23	Email correspondence with D. Gersten regarding my analysis and recommendations as to the 2/16/23 correspondence from Joel Aresty, Esq. discussing bankruptcy of homeowner Ana Danton as related to Ms. Danton's candidacy for the Board of Directors	ERT	0.20
02/16/23	Email correspondence with R. Stone and K. Godwin regarding status of their analysis of pending lawsuits by/against the Hammocks and post-2014 foreclosure cases (and strategy going forward with regard to same)	ERT	0.40
02/16/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding additional information needed as to status of analysis of documents located in storage units and status of retention of independent auditors, in furtherance of drafting Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.30
02/16/23	Continue drafting Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (finish drafting the following sections: 1) Section B(1)-The Receiver's Employment of Professionals, now pp. 4-5; 2) Section B(3)(a)-FSR's Operation of the Association, Under the Direction of the Receiver, now pp. 10-12; and 3) Section B(3)(b) - A New Board is On the Way Next Month, now pp. 12-13; begin to draft the following section: Section B(2)-The Receiver's Continued: 1) Analysis of the Association's Financial Records; and 2) Management of Association Assets, pp. 5-10)	ERT	2.40

02/16/23	Email correspondence with independent counsel (Kenneth Murena, Esq.) regarding additional insurance information needed to draft Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.30
02/16/23	Revise, in accordance with comments by D. Gersten, Reply to Debtors' 2/3/23 Response to Court-Appointed Receiver for the Hammocks Community Association Inc.'s Motion for Relief From: 1) Orders Finding Liability and Awarding Damages [D.E. #328, #339, #477, #480]; and 2) Final Judgment [D.E. #521] (filed in the matter styled In re: Josue Cepero, et al., Case No. 17-20358-LMI) and proof for final review by co-counsel (Kenneth Murena, Esq.)	ERT	1.90
02/17/23	Review and forward Extra Space payment email .1; review multiple emails between Eric Thompson and Rebecca Stone re: J.P. Morgan case .1; review multiple emails between Eric Thompson and Rebecca Stone re: Diaz case .1; review and respond to Sonnet Kapila email re: listing and amounts of attorneys fees paid during prior administration .2; review and respond to Andrew Weiner email re: commercial property payments and review proposed letter to send for future payments .2; review and respond to Ken Murena email re: insurance .1; email to Steve Katz, Melanie Damian and Jesmany Jomarron re: candidates in default .1; email to Melanie Damian re: Ken advice on Joel Aresty letter .1; review and respond to Melissa Davis email re: attorney payments .1; review and respond to Eric Thompson email re: new landscaper wanting to take over work.1; review final Ken Murena edited draft of Cepero reply and authorize filing .4; review and respond to Melanie Damian email re: delinquencies .1; review Chicky Ardisson email re: estoppel letter .1; review and respond to Eric Thompson email re: Courtland rentals .1; review several drafts incorporated in Jesmany Jomarron emails to Melanie Damian re: interview scheduling and documents requested .3; review and respond to Andrew Weiner email re: form for background check .1; review Jesmany email to candidates (authorized) re: schedule interviews .1; review and respond to Melanie Damian email re: candidates .1; conference with Russell Landy re: Izzy Reyes .2; r	DMG2	3.90
02/17/23	Research on title, lien, court filings, public records, and corporate records of Christina at the Hammocks subdivision, #35-57 in the neighborhood owners list of property appraiser.	KAG1	3.60
02/17/23	Several emails with Russell Landy on the State and Federal cases styled Gallego and Hammocks v. Perez and Luffi and Gallego and Hammocks v. Wosk on statuses and getting Napoleon Hilton off all cases as counsel for Hammocks and dismissals without any risk of attorney's fees shifting back to Hammocks	RHS1	0.20

02/17/23	Detailed review invoices from Sarmina Centraro Law Firm received from DVLLP Firm as invoices paid by Hammocks; draft list of all the line items and various ways that the invoices paid by Hammocks are deficient and inscrutable as to what work was performed, in connection with analysis of Sarmina Centraro Law Firm invoices for report to Judge Gersten	RHS1	0.80
02/17/23	Draft Excel of the 23 cases handled by Sarmina Centraro Law Firm, with homeowners' names, addresses, the original amount Hammocks alleged homeowner owed, what portion of that amount was "fines" over \$500 per fine vs dues and assessments, in connection with drafting report of Sarmina Centraro work performed for Hammocks for Judge Gersten	RHS1	2.00
02/17/23	Email correspondence with Andrew Weiner (First Service Residential) regarding additional information needed (as to monies being collected by FSR) to draft Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties	ERT	0.10
02/17/23	Continue drafting Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (finish drafting the following section: Section B(2)-The Receiver's Continued: 1) Analysis of the Association's Financial Records; and 2) Management of Association Assets, pp. 5-10; draft the following sections: 1) Section B(3)(c)-Turf Continues Beautifying the Association's Grounds; pg. 14; and 2) Section B(3)(d)-An Independent, Legitimate Security Force is Back at the Hammocks, pp. 14-15)	ERT	6.10
02/17/23	Email correspondence with forensic accountant (Melissa Davis and Soneet Kapila of Kapila Mukamal) regarding additional update as to status of their analysis (needed to draft Supplemental Report, as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.40
02/17/23	Email correspondence with independent counsel (Kennth Murena, Esq.) regarding additional insurance, bank account and vehicle information needed to draft Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.60
02/17/23	Analyze "Status Update as of February 16, 2023," provided on 2/16/23 by forensic accountant (Melissa Davis of Kapila Mukamal), 2 pages, in furtherance of drafting Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.20
02/17/23	Email correspondence with R. Stone regarding strategy (including motions to stay) as to the pending lawsuits filed, in part, against the	ERT	0.20

Hammocks styled: 1) J.P. Morgan v. Grimm, Case No. 2019-031951-CA-01; and 2) DLJ Mortgage v. Aranciba, Case No. 2020-006211-CA-01

02/17/23	Analyze Reply to Debtors' 2/3/23 Response to Court-Appointed Receiver for the Hammocks Community Association Inc.'s Motion for Relief From: 1) Orders Finding Liability and Awarding Damages [D.E. #328, #339,#477, #480]; and 2) Final Judgment[D.E. #521] (filed in the matter styled In re: Josue Cepero, et al., Case No. 17-20358-LMI) as revised by co-counsel (Kenneth Murena, Esq.) in furtherance of finalizing and filing same	ERT	0.20
02/18/23	Review and respond to Melanie Damian email re: candidate Villalobos .1; and review and approve payments .1	DMG2	0.20
02/19/23	Review Melanie Damian email with memo by Cassandra Murena re: bankruptcy effect on voting re: Ana Danton .2; review and respond to Steve Katz email re: estoppel issues.1; review and respond to multiple Jesmany Jomarron email(s) re: candidate interviews and send email(s) to Adam Ruff re: copies of submitted documents .3; review emails between Melanie Damian and Jesmany Jomarron re: late fees .1; review and respond to emails between Ken Murean and Eric Thompson re: agreed order .1; conduct interviews of candidates for the board 3.0; and partial interview debrief with Melanie Damian .3	DMG2	4.10
02/20/23	Research on title, lien, court filings, public records, and corporate records of Christina at the Hammocks subdivision, #58-75 in the neighborhood owners list of property appraiser. Summary of this neighborhood to E. Thompson and R. Stone.	KAG1	4.60
02/20/23	Receive and respond to email from Eric Thompson regarding cases 22-23632, Reverse Mortgage Funding v. Hammocks et al., and 21-181828, Wells Fargo v. Hammocks et al; draft updated to Master Excel	RHS1	0.20
02/20/23	Send and receive and respond to several emails with Mark Kelly and Andrew J Cetraro regarding pending action against Hammocks for unpaid legal fees and inquiring about specific files where Cetraro billed Hammocks for work, and which property and homeowner the invoices correlate to; draft notes on each of the files with information provided for report on settlement of claims	RHS1	0.60
02/20/23	Review and analysis of detailed email from K. Godwin regarding Adagio Condos and progress of searches and research thus far	RHS1	0.10
02/20/23	Receive and respond to email from Eric Thompson regarding appearing on all additional cases on behalf of Hammocks; cases where Hilton Napoleon is still counsel of record; communication with Rachel	RHS1	0.10

Williams on the two cases with Gallego v. Perez and Luffi

02/20/23	Receive and review notice of hearing for 4-12-2023 on Defendant's Notice of Special Appearance and Motion for Enlargement of Time, JPMORGAN CHASE BANK NATIONAL ASSOCIATION vs Danilo J Grimm et al., Case No.: 2019-031951-CA-01, send same for entry in calendar	RHS1	0.10
02/20/23	Receive and respond to email from M.Aron regarding Gallego/Hammocks v. Wosk, Case No.: 20-25545; and her latest conversation with Plaintiff's counsel Guy Spiegelman and progress of Wosk accepting settlement or proposing a counter, prior to our filing a VD	RHS1	0.10
02/20/23	Receive and respond to email from K. Godwin on the payment, timing and amount of HOA dues and timing and dates of increases	RHS1	0.10
02/20/23	Finish drafting Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (draft the following sections: 1) Section A-Introduction, pp. 3-4; 2) Section 3(b)(e)-Cleaning Up the Association's Governing Documents, pg. 15; 3) Section 4-Lawsuits Involving the Association, pp. 15-18; 4) Section 5-The Association's Prior Attorneys, pp. 18-19; and 5) Section C-Conclusion, pp. 19-20)	ERT	6.90
02/20/23	Email correspondence with independent counsel (Kennth Murena, Esq.) regarding vehicle information needed to draft Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.20
02/21/23	Review email re: storage and send to Russell Landy .1; review and respond to Melanie Damian email re: Marco Antonio letter .1; review and respond to Jesmany Jomarron email re: missing candidate re: interview appointment .1; review and respond to Eric Thompson email re: invoice .1; review Angela Lopez email re: Marco Antonio letter .1; review and respond to Jesmany Jomarron email re: Oscar Velez .1; review and respond to Eric Thompson email re: petition .1; review and respond to Melanie Damian email re: Marco Antonio letter .1; review and respond to Eric Thompson email re: Cepero federal court filing .1; review and respond and edit current draft of report to court ; review and respond to Jesmany Jomarron email(s) re: interviews of candidates .1; review and respond to Eric Thompson email re: invoice .1; review Eric Thompson email re: proposed draft of status report for federal court re: Cepero federal case .2; review and respond to Eric Thompson email re: report .1; and conduct interviews of candidates for the board 3.5	DMG2	4.90
02/21/23	Research of statutes and neighborhood covenants regarding	KAG1	0.80

	requirements for a lien, optional court filing, and rank of association lien.		
02/21/23	Research on title, lien, court filings, public records, and corporate records of 27 addresses of the Live Oaks at the Hammocks subdivision neighborhood owners list of property appraiser.	KAG1	5.00
02/21/23	Communication with E. Thompson and R. Stone regarding research and question pertaining to association liens found.	KAG1	0.10
02/21/23	Receive and analyze email from K. Godwin that the Declaration puts the neighborhood lien third in line after tax liens and the first mortgage; draft response inquiry regarding the open bank foreclosure cases and priority of liens	RHS1	0.10
02/21/23	Receive and respond to email from E. Thompson regarding entering the NOA and NOF Receiver Order on all of the remaining cases marked as "open" regardless of whether Alfaro has moved to withdraw yet	RHS1	0.10
02/21/23	Conference with Racel Williams of City of Miami regarding Gallego and Hammocks v. Perez and Luffi, Case No.: 2020-023064-CA-01 and proposed order granting Napoleon's motion to withdraw as counsel for Hammocks	RHS1	0.20
02/21/23	Draft proposed order on Hilton Napoleon's withdrawal as counsel of record for Hammocks and send to Rachel Walter's for review and approval	RHS1	0.30
02/21/23	Draft Notice of Status of Proceedings in Bankruptcy Court (as required by Court's 1/20/23 Paperless Order), to be filed in the matter styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS, 3 pages	ERT	0.40
02/21/23	Email correspondence with independent counsel (Kenneth Murena, Esq.) regarding and attaching draft Notice of Status of Proceedings in Bankruptcy Court (as required by Court's 1/20/23 Paperless Order), to be filed in the matter styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS (for his review and approval), including his revisions to same	ERT	0.10
02/22/23	Review and edit report for court .8; review and edit draft of second notice .3; review Maia Aron email/memo re: case progress .1; and review email from Marco Antonio Real re: interview .1	DMG2	1.30
02/22/23	Conference with Adam Ruff with Master Excel, list given to Eric Thompson of all case updates for Report, and list of Maia Aron cases, review and confirm all cases marked as active/open which still need	RHS1	1.20

NOA and NOF receiver Order filed

02/22/23	Receive and respond to email from K. Godwin regarding the timing of when new Hammocks' owners are first assessed fees, the timing of purchase and first payment due in connection with fee assessments	RHS1	0.10
02/22/23	Incorporate E. Thompsons revisions into the Motion for stay in DLJ Mortgage v. Aranciba, Case No.: 2020-006211-CA01; draft and send email to Adam Ruff with finalized motion and request for setting on the same hearing set for March 7, 2023	RHS1	0.20
02/22/23	Draft minor revisions to proposed order on Hilton Napoleon's withdraw as counsel for Hammocks and acknowledgement of GRSM as counsel of record for Receiver for Hammocks, Case No. 20-23064 CA 01 (25).	RHS1	0.10
02/22/23	Draft and send email to Mr. Napoleon following the hearing before Judge Manno Schurr on 2/21/2023 and attaching proposed order for approval and submission to the Court, Gallego and Hammocks v. Perez and Luffi, Case No. 20-23064 CA 01 (25).	RHS1	0.10
02/22/23	Receive and analyze, research docket and Complaint for case No.: 2021-000124-CA01, and respond to email from Kryz Godwin regarding entity IH5 Florida Property LP and noting entitles that pop up in more than one place in more than one way to start to build a web of actors	RHS1	0.40
02/22/23	Receive and respond to email from Michael Provenzale requesting conference on Receivership in regard to SW 104TH FL PARTNERS LLC et al vs HAMMOCKS COMMUNITY ASSOCIATION INCORPORATED, Case No.: 2022-18092-CA01	RHS1	0.10
02/22/23	Review Complaint and Answers and Aff. Defenses filed by (1) Danny Yero, (2) Beach Club Kendall, and (3) Biscayne Beach Club, and the Answer filed by Hammocks, Toorak Caprial Partners, LLC v. Beach Club Kendal, LLC et al, Case No.: 2020-22065-CA01	RHS1	0.30
02/22/23	Receive and review email from Judge Gersten following email from M. Aron on status update of Toorak Caprial Partners, LLC v. Beach Club Kendal, LLC et al, Case No.: 2020-22065-CA01; raft and send synopsis of essential information	RHS1	0.30
02/22/23	Draft and send email to M. Aron prior to her hearing on Toorak Capital Partners v. Beach Club Kendall, LLC, Case No.: 2020-22065-CA01 on Receiver emergency motion to stay and advise Maia of the facts of the hearing the day before in front of the same judge, advise to stress the differences between the case at bar and the case involving two off cuty Miami-Dade police officers	RHS1	0.20

02/22/23	Review docket and all filings for third Toorak v. Beach Club Kendall, LLC case not already listed on the Master Excel, Case No.: 2020-025327-CA-01; add case current status to Master List and print docket for NOA and NOF receiver Order to be filed in the case	RHS1	0.40
02/22/23	Conference with M. Aron following hearing on Receiver's Emergency Motion to Stay; update on Wosk, and stays of her review of the financials	RHS1	0.20
02/22/23	Revise, in accordance with comments by D. Gersten, Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.20
02/22/23	Revise Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) in accordance with comments/suggested revisions by independent counsel (Melanie Damian, Esq. and Russell Landy, Esq.)	ERT	0.30
02/22/23	Email correspondence with independent counsel (Melanie Damian, Esq. and Russell Landy, Esq.) regarding their comments/suggested revisions to Supplemental Report (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.20
02/23/23	Review Maia Aron email with memo re: case .2; review and respond to Maia Aron email with memo re: case .2; review and respond to Jesmany Jomarron email re: notice .1; review and respond to Melanie Damian email re: candidate .1; review and respond to email from extra space re: vacate premises .1; review and respond to email from Chick Ardisson re: letter .1; review and respond to email from Jesmany Jomarron re: candidate .1; review and respond to email from Chicky Ardisson re: estoppel letter .1; review and respond to email from Mike Kaufman re: billing .1; review and respond to email from Russell Landy re: Rasco Klock law firm .2; review and respond to email from Ken Landy re: sale of cars .1; review and respond to email from Jesmany Jomarron re: background checks of candidates .2; review and respond to Russell Landy re: Rasco Clock firm .1; review and respond to Jesmany Jomarron email re: posting and release of candidate .1; review and respond to Jesmany Jomarron email. re: town hall zoom and questions .1; review Jesmany Jomarron email with proposed notice and edit same re: town hall .3; review and respond to Russel Landy email re: equipment and review the finance agreement re: same .3; review and respond to Ken Murena email re: power of attorney .1; review and respond to Ken Murena emails re: CarMax offers .2; review and respond to Rebecca Stone email re: extension of time re: discovery .1; review and respond to Jesmany Jomarron email re: proofing completed .1; review and fo	DMG2	4.00

02/23/23	Research on title, lien, court filings, public records, and corporate records of 35 addresses of the Live Oaks at the Hammocks subdivision neighborhood owners list of property appraiser.	KAG1	5.20
02/23/23	Update of case table, added a new page for outstanding property concerns that have no filing and listing of corporate property holdings within the pertinent neighborhoods.	KAG1	0.30
02/23/23	Receive and review email and 6 attachments of written discovery from Rachel Walters on Gallego and Hammocks v. Perez and Luffi, Case No.: 20-23064-CA01(25); draft and send response to Rachel Walters	RHS1	0.20
02/23/23	Westlaw research of whether when a claim is voluntarily dismissed by 1 party, if the case goes to a final judgment, if the party who voluntarily dismissed prior to the Fj, can still be liable for attorney fees under prevailing party or other grounds; draft and send research results report to Eric Thompson	RHS1	1.10
02/23/23	Receive, analyze, slightly revise the second batch of cases M. Aron is requesting the financial information for; draft and send email to Ann Mcdermot, Chris Likam, and Steven Katz with the request attached	RHS1	0.20
02/23/23	Research and analysis of Florida Statutes section 770 Defamation in connection with analysis of attorney's fees award for voluntary dismissal in Gallego and Hammocks actions against Perez and Luffi	RHS1	0.50
02/23/23	Receive response with attachments from SBK Legal on the requested additional financial information and forward to M. Aron	RHS1	0.20
02/23/23	Receive and respond to multiple emails between Judge Gersten, Eric Thompson and myself regarding extension on discovery, motion for stay, recent actions of SAO appealing Judge Manno Schurr's order granting stay in Hammocks v. Perez and Luffi, Case No.: 20-23064-CA01(25)	RHS1	0.30
02/23/23	Review the discovery specifically served upon Hammocks (RFPs from both Perez and Luffi and Interrogatories from Luffi) Hammocks v. Perez and Luffi, Case No.: 20-23064-CA01(25); send by email to Judge Gersten and Eric Thompson	RHS1	0.20
02/24/23	Review and respond to Michael Kaufman email re: Billing .1; review and respond to Jesmany Jomarron email re: background check and review information .2; Review accounts payable and determine whether to authorize payments .2; and review email re: order of dismissal re: Vasquez v. Hammocks .1	DMG2	0.60
02/24/23	Research on title, lien, court filings, public records, and corporate	KAG1	6.40

records of 32 addresses to complete Live Oaks at the Hammocks subdivision neighborhood owners list of property appraiser.

02/24/23	Conference with Eric Thompson regarding the three (3) Toorak cases and future actions regarding joining Defendant's motion to vacate or filing motion for stay	RHS1	0.30
02/24/23	Receive email from M.Aron regarding further settlement discussions with Wosk and her refusal to settle the claim; draft and send email asking Maia if serving a PFS before we dismiss, and allowing the time to expire, protect us later, or limit her recovery or cancel it out	RHS1	0.30
02/26/23	Review and respond to Melanie Damian email re: candidate .1; review and respond to Marco Antonio email re: sale of homes .1; review and respond to email from Melanie Damian and Jesmany Jomarron re: conference .1; review and respond too Melanie Damian email with Andrew Weiner re: trash .1; conference with Jesmany Jomarron re: AC issues for next meeting .9; and conference with Jesmany Jomarron re: election procedure .3	DMG2	1.60
02/27/23	Conference with Andrew Weiner re: beaches and fencing .1; attend advisory committee meeting 1.5; review and respond to Eric Thompson email re: power of attorney .1; review Michael Kaufman document re: Gallardi property .3; conference with Melanie Damian and Jesmany Jomarron re: campaign issues 1.0; review Andrew Weiner email and proposals for lakes .2; review Ana Danton email re: issues .1; review and respond to Eric Thompson email re: new case filed .1; and review and respond to Adam Ruff email re: served with new case .1	DMG2	3.50
02/27/23	Research on title, lien, court filings, public records, and corporate records of 42 addresses in the Oak Lake at the Hammocks subdivision neighborhood owners list of property appraiser.	KAG1	5.00
02/27/23	Revise Motion for Stay and send for filing prior to 2/28/2023 hearing on Motion to Set Aside Count I of Foreclosure Final Judgment	RHS1	0.60
02/27/23	Receive and respond to several emails for with D. Gersten and E. Thompson on Shawn Michael Vasquez v. Hammocks Community Association Incorporated, Case No.: 2021-25535-CA01; Toorak cases and Toorak case set for tomorrow and case to assign to M. Aron	RHS1	0.20
02/27/23	Receive and review the proposed and revised order on today's hearing; review my notes from the hearing; draft email reply approving order, Toorak Capital Partners LLC v. Beach Club Kendall LLC, et al., Case No.: 2020- 025327-CA-01	RHS1	0.20
02/27/23	Detailed review of docket, Complaint and Exhibits in SW 104th FL	RHS1	0.50

Partners LLC et al v. Hammocks Community Association Incorporated,
Case No.: 2022-018092-CA-01 in preparation for call with Plaintiff's
attorney

02/27/23	Conference with Plaintiff's attorney Michael Provenzale in SW 104th FL Partners LLC et al v. Hammocks Community Association Incorporated, Case No.: 2022-018092-CA-01	RHS1	0.30
02/27/23	Receive, analyze and respond to email from E. Thompson on Toorak Capital Partners LLC v. Beach Club Kendall LLC, et al., Case No.: 2020- 025327-CA-01 regarding Motion for Stay and hearing tomorrow on Motion to Vacate	RHS1	0.10
02/27/23	Review emails sent by M. Aron regarding her conversations with Counsel for Toorak, and review docket on Toorak Capital Partners LLC v. Beach Club Kendall LLC, et al., Case No.: 2020- 025327-CA-01 in connection with drafting response to E. Thompson	RHS1	0.30
02/27/23	Conference with Yosmay H. on Toorak hearing tomorrow and filed notice of Joinder with Biscayne Beach Club Motion	RHS1	0.30
02/27/23	Telephone conference with D. Gersten, independent counsel (Russell Landy, Esq.) and Andrew Weiner (First Service Residential) to discuss open/completed action items	ERT	1.10
02/27/23	Attend (remotely, via Zoom) meeting with D. Gersten, Hammocks advisory board, and co-counsels (Jesmony Jomarron, Esq. and Michael Kaufman, Esq.) to continue to discuss strategy/action items going forward	ERT	1.50
02/27/23	Analyze Florida Bar article "The Use of the Florida Homestead to Defraud Creditors" (provided by Advisory Committee counsel, Michael Kaufman, Esq.), 8 pages, in furtherance of evaluating strategy with regard to efforts to assert a claim against former Board member Monica Ghilardi for appropriation of Association assets, including with regard to her personal residence	ERT	0.10
02/27/23	Begin to analyze and shepardize the following case law addressing exceptions to Florida's homestead exemption for fraud (in furtherance of evaluating strategy with regard to efforts to assert a claim against former Board member Monica Ghilardi for appropriation of Association assets, including with regard to her personal residence): 1) Financial Federated Title & Trust, Inc. v. Levy (S.D. Fla. 201), 12 pages; 2) Havoco of America, Ltd. v. Hill (Fla. 2001), 11 pages; 3) In re: Mesa (S.D. Fla. 1999), 7 pages; 4) Lee v. Wiand (M.D. Fla. 2018), 18 pages; and 5) Renda v. Price (Fla. 4th DCA 2022), 3 pages	ERT	0.70

02/27/23	Telephone conference with R. Stone regarding strategy as to 3 pending lawsuits filed against the Hammocks by Tarook Capital Partners	ERT	0.30
02/28/23	Review and edit powerpoint for today's court hearing .7 ; conference with Jesmany Jomarron re: edits to powerpoint .8; attend and present at court hearing 1.0; conference with Eric Thompson and Jesmany Jomarron re: de-brief judge's instructions and issues regarding website posting .4; review and respond to Eric Thompson email re: fees .1; review and respond to Rebecca Stone email re: stay on court case .1; review and respond to Rebecca Stone email re: comprehensive case review .1; review and respond to Eric Thompson email re: FSU Law Review article re: campaign rules and read article .4; attend 1st candidate meet and greet 2.8; review and respond to Michael Kaufman email with Don Kearns affidavit .1; and review and respond to Kys Godwin email with property list .1	DMG2	6.60
02/28/23	Research on title, lien, court filings, public records, and corporate records of 22 addresses in the Oak Lake at the Hammocks subdivision neighborhood owners list of property appraiser.	KAG1	3.90
02/28/23	Thorough research on properties owned currently or historically in Miami-Dade County by Marglli Gallego, Jose Antonio Gonzales, Myriam Arango Rodgers, Monica Isabel Ghilardi, and Yoleidis Lopez Garcia.	KAG1	9.30
02/28/23	Receive and analyze email from M. Aron regarding possibly serving a PFS in Wosk and whrther4 that could protect Hammocks from fees later; draft and send response as to filing voluntary dismissal	RHS1	0.20
02/28/23	Review and analyze Affidavit of Andrew Centero, Supplemental Affidavit of Andrew Centero, Hammocks Answer and Affirmative Defenses, Plaintiff's Motion for Summary Judgment, Plaintiff's Supplemental Exhibits filed in Support of MSJ	RHS1	1.60
02/28/23	Toorak v. Beach Club Kendall, LLC, Biscayne Beach Blub, LLC, Danny Yero, and Hammocks, Case No.: 2020-25327-CA01, attend MC hearing on Defendant's Motion to Set Aside	RHS1	0.70
02/28/23	Draft and send email update to Judge Gersten and Eric Thompson from Toorak hearing	RHS1	0.10
02/28/23	Receive and respond to email from E. Thompson regarding settlement of Shawn Michael Vasquez v. Hammocks Community Association, Case No.: 2021-025535-CA01 regarding the facts of settlement and Sedgwick's handling of the matter in April 2022, before the Receiver's appointment, handled and settled and handled directly with Sedgwick Claims Management Services, Inc, Dennis J. Broderick, Claims	RHS1	0.20

Examiner

02/28/23	Return call to homeowner/Defendant Elgis "Egg" Sui regarding Hammocks v. Siu, et al., Case No.: 22-19397-CA advising of the next case actions to occur, inclusion on service list, and status of accounting for her property	RHS1	0.20
02/28/23	Draft and send follow up email to homeowner/Defendant Elgis "Egg" Sui regarding Hammocks v. Siu, et al., Case No.: 22-19397-CA advising of the next case actions to occur, inclusion on service list, and status of accounting for her property	RHS1	0.20
02/28/23	Review and analyze multiple notices of removal from service lists of Amina Monique McNeil from Case Numbers: 2020CA-004269	RHS1	0.10
02/28/23	Review Case Updates List and Master Excel to select next cases for 3rd batch of financial information needed from SBK Legal	RHS1	1.10
02/28/23	Draft and send detailed email to Michael Provenzale regarding SW 104th FL Partners LLC et al v. Hammocks Community Association Incorporated, Case No.: 2022-018092-CA-01, the Class E board seats his client may be entitled to and moving the case forward	RHS1	0.40
02/28/23	Attend (remotely, via Zoom) Court-required status conference ("State of the Union III")	ERT	1.00
02/28/23	Telephone conference (and, in part, Zoom meeting) with D. Gersten (and, for a portion of the telephone conference, Jesmany Jomarron, Esq.) to discuss Mr. Jomarron's draft PowerPoint presentaton for use during today's Court-required status conference ("State of the Union III"), including revisions to same	ERT	1.40
02/28/23	Telephone conference with outside counsel Maia Aron, Esq. to discuss potential assignment of additional Hammocks cases to Ms. Aron	ERT	0.10
02/28/23	Finish analyzing and shepardizing the following case law addressing exceptions to Florida's homestead exemption for fraud (in furtherance of evaluating strategy with regard to efforts to assert a claim against former Board member Monica Ghilardi for appropriation of Association assets, including with regard to her personal residence): 1) Financial Federated Title & Trust, Inc. v. Levy (S.D. Fla. 201), 12 pages; 2) Havoco of America, Ltd. v. Hill (Fla. 2001), 11 pages; 3) In re: Mesa (S.D. Fla. 1999), 7 pages; 4) Lee v. Wiand (M.D. Fla. 2018), 18 pages; and 5) Renda v. Price (Fla. 4th DCA 2022), 3 pages	ERT	0.40
03/01/23	Conference with Eric Thompson, Rebecca Stone and Krysl Godwin re: case(s) status 1.4; review and respond to Eric Thompson email reL DLJ	DMG2	2.50

Mfg. case .1; review and respond to Eric Thompson email re: Maia Aron cases .1; conference with Melanie Damian and Eric Thompson re: meet and greet de-brief .2; review Andrew Weiner email with color coded detailed assignment lists and open action items .2; review and respond to detailed email re: Mallard's house information .2; review and respond to Andrew Weiner email re: Turf offer .1; review and respond to Russell Landy email re: payoff .1; and review and respond to Andrew Weiner email re: Lake Doctor contract .1

03/01/23	Case and research status meeting with Judge Gersten, E. Thompson, and R. Stone to discuss work completed and next research focus.	KAG1	1.40
03/01/23	Communicated with and sent report to Judge Gersten, E. Thompson, and R. Stone regarding research of assets owned by K. Alzate, L. Capielo, M. Gill, M. Kopec, M. Maceda, and L. Ordonez.	KAG1	0.10
03/01/23	Draft proposed order of stay on Hammocks v. Mero, Case No.: 2022-013537-CA-01, per Judge Arzola's order granting Alfaro's withdraw that receiver shall submit a separate order for an indefinite stay	RHS1	0.20
03/01/23	Receive and review the proposed order for indefinite stay entered of today's date, by Judge Arzola, Hammocks v. Mero, Case No.: 2022-013537-CA-01	RHS1	0.10
03/01/23	Receive and review Order on Defendant's Motion to Vacate entered today on Toorak v. Beach Club Kendall LLC et al, Case No.: 2020-025327-CA-01; draft and send email attaching Order to M. Aron	RHS1	0.10
03/01/23	Conference with David Gersten, Eric Thompson, and Kris Godwin on global case statuses and investigations	RHS1	1.40
03/01/23	Draft and send detailed email to Jesmany Jomarron regarding setting a call with him, myself and Michael Provenzale to discuss the issues in SW 104TH FL PARTNERS LLC et al v. HAMMOCKS COMMUNITY ASSOCIATION INCORPORATED, 2022-018092-CA-01	RHS1	0.60
03/01/23	Telephone conference with D. Gersten, R. Stone, and K. Godwin to discuss strategy with regard to: 1) pending cases filed by/against the Hammocks; and 2) research as to potential foreclosure self-dealing by prior Board members/insiders	ERT	1.40
03/01/23	Email correspondence with Maia Aron, Esq. regarding our request for Ms. Aron to represent the Hammocks in additional pending foreclosure cases, including pertinent deadlines pertaining thereto	ERT	0.40
03/02/23	Review Ken Murena email with chart containing Cars/offers .3;	DMG2	2.10

conference with Jesmany Jomarron re: Shole (employee) matter .3; review and sign Power of attorneys for multiple cars .2; review and respond to Maia Aron email with retainer agreements, review and sign .2; review and respond to Rebecca Stone email re: new Loancare case .1; review and respond to Rebecca Stone email re: answer and affirmative defenses .1; review and respond to Ken Murean email re: cars .1; conference with Melanie Damian and Russell Landy re: Hilton Napoleon issue and budget .6; review and respond to Maia Aron email re: dismissal of case .1; and review and respond to Russell Landy email re: Lake Doctors contract .1

03/02/23	Organized lists of pertinent employes and attorneys for thorough research. Researched real estate assets, court actions, and public documents of Marie C. Gill and Kevin Alzate.	KAG1	3.80
03/02/23	Communication with Judge Gersten, R. Stone, and E. Thompson regarding research of pertinent names and possible tools to distinguish pertinent Hammocks' employees from other similar named people.	KAG1	0.10
03/02/23	Receive call from Robert P. Kelly regarding Hammocks PFS offer made 8/30/2022; call set for 3/3/2023, The Sarmina Cetraro Law Group, P.A. v. Hammocks	RHS1	0.20
03/02/23	Draft and send email with call agenda of findings to Robert P. Kelly and Andrew Centero regarding invoices, The Sarmina Cetraro Law Group, P.A. v. Hammocks	RHS1	0.20
03/02/23	Conference with M. Aron on the 3 Toorak cases and update on Wosk; stipulation for substitution of counsel on Toorak, events from 2-28-2023 hearing on Toorak Case No.: 2020-25327-CA01; Maia filing answer and affirmative defenses on the new DLJ case against Hammocks	RHS1	0.30
03/02/23	Review Retainer Agreements for matters being assigned by the Receiver to M. Aron of Mark Migdal & Hayden; DLJ Mortgage Capital, Inc. v. Hammocks, et al., Case No. 2023-000769-CA-01; Amerant Bank v. Hammocks, et al., Case No. 2023-001195-CA-01; Reverse Mortgage Funding v. Hammocks, et al., Case No. 2022-024269-CA-01; Toorak Capital Partners, LLC v. Hammocks, et al., Case No. 2020-25327-CA-01; Toorak Capital Partners, LLC v. Hammocks, et al., Case No. 2020-25383-CA-01	RHS1	0.10
03/02/23	Draft cover email and send executed Retainer Agreements for new matters being assigned by the Receiver to M. Aron of Mark Migdal & Hayden; DLJ Mortgage Capital, Inc. v. Hammocks, et al., Case No. 2023-000769-CA-01; Amerant Bank v. Hammocks, et al., Case No. 2023-001195-CA-01; Reverse Mortgage Funding v. Hammocks, et al.,	RHS1	0.10

Case No. 2022-024269-CA-01; Toorak Capital Partners, LLC v. Hammocks, et al., Case No. 2020-25327-CA-01; Toorak Capital Partners, LLC v. Hammocks, et al., Case No. 2020-25383-CA-01

03/02/23	Receive and review new Complaint served Loancare, LLC v. Mardini, Hammocks, et al and exhibits thereto (56 pages), draft summary of claims to send to Judge Gersten and Eric Thompson	RHS1	0.40
03/02/23	Correspondences with M. Aron regarding stipulation for substitution of counsel on Toorak cases and the reverse Mortgage Complaint that was filed under seal; send copy of the Complaint	RHS1	0.10
03/02/23	Review list of previously assigned cases; add additional assignments of today's date to Master List of cases being handled by M. Aron	RHS1	0.10
03/02/23	Receive and review emails from M. Arron on Hammocks/Gallego v. Wosk - 2020-025545 - Dismissal without Prejudice and her filing of NOA and Answer and Affirmative Defenses in DLJ Mortgage Capital v. Hammocks, 23-000769	RHS1	0.10
03/02/23	Email correspondence with D. Gersten and Maia Aron, Esq. regarding strategy as to potential dismissal of case styled Marglli Gallego, et al. v. Doria Wosk, Case No. 2020-025545 CA 01	ERT	0.10
03/02/23	Analyze and revise draft Subpoena Duces Tecum for Deposition to Alfaro & Fernandez (drafted by independent counsel, Russell Landy. Esq.), 3 pages	ERT	0.40
03/02/23	Email correspondence with independent counsel (Russell Landy. Esq.) regarding my suggested revisions to draft Subpoena Duces Tecum for Deposition to Alfaro & Fernandez (drafted by Mr. Landy)	ERT	0.20
03/03/23	Review and respond to Eric Thompson email re: insurance .1; review email from Russell Landy re: Hilton Napoleon .1; conference with Russell Landy and Melanie Damian re: Hilton Napoleon .2; review and respond to Chicky Ardisson email re: missing car .1; review and respond to lengthy email from Rebecca Stone re: Cetraro law firm .2; review and respond to Krys Godwin emails re: Hilton Napoleon selling property to Alzate .2; review and respond to Russell Landy emails re: emails from Leslie Rothenberg .1; review email between Rebecca Stone and Jesmany Jomarron re: settlement .1; review and respond to Rebecca Stone and Jesmany communications re: settlement .1; review and respond to Eric Thompson and Ken Murean emails re: insurance carriers .1; review and respond to Russell Landy email re: stolen truck recovery .1; and review and resend to Maia Aron email re: dismissal of case .1;	DMG2	1.50

03/03/23	Completed research of real estate assets, court actions, and public documents of Marie C. Gill and Kevin Alzate. Researched real estate assets, court actions, and public documents of Ligia Capielo, Marlene Kopec and husband, Madeline Maceda, and Luz Ordonez. Thorough research of property exchange between K. Alzate and H. Napoleon, specifically link of Napoleon as representation to previous owner.	KAG1	7.60
03/03/23	Communication of response to specific question posed by E. Thompson regarding property sold by H. Napoleon, and criminal history of J. Hancock.	KAG1	0.20
03/03/23	Conference with Andrew Centero and Robert P. Kelly to discuss additional questions related to signatories to retainer agreement, due diligence performed prior to filing lawsuits against Hammocks homeowners, settlement of claims (33 minute call)	RHS1	0.60
03/03/23	Draft and send detailed email of report from call with Andrew Centero and Robert P. Kelly	RHS1	0.40
03/03/23	Telephone conference with independent counsel (Russell Landy. Esq.) regarding our proposed revisions to Adraft Subpoena Duces Tecum for Deposition to Alfaro & Fernandez (drafted by Mr. Landy)	ERT	0.20
03/04/23	Review and respond to Rebecca Stone email re: Centaro firm .1; and medial to Eric Thompson and Jesmany Jomarron re: campaign rules .1	DMG2	0.20
03/04/23	Draft and send email to M. Aron regarding Answer and Affirmative Defenses filed and Motion to set aside clerk's default, attaching sample Motion and reequipment of Hammocks Affidavit, DLJ MORTGAGE CAPITAL, INC. VS ROSA F. TRUJILLO ET AL., Case No. 2023-000769-CA-01	RHS1	0.10
03/05/23	Review and respond to Jesmany Jomarron email with proposed executive summary .2; review and respond to Melanie Damian email with proposed budget .1; initial review of proposed budget 1.2 ; review and respond to Jesmany Jomarron email with the revised executive summary and approve .1; revel and respond to Melanie Damian email re: b budget .1; review and edit and respond to Jesmany email with draft of latest executive summary .3; review and forward email from Charlotte Siegel re: Steve Katz bill .1; review and forward letter from the Ceperos re: Chicky re: ACC .1; review and respond to Rebecca Stone email re: Sarmina law firm .1; and review and respond to Kris Godwin email re: better information/common names .1;	DMG2	2.40
03/05/23	Completed research of real estate assets, court actions (civil and criminal), and public documents of Valeska Aburto Maldonado, Arianna Aguilera, Amir J. Ali, and Xiomara Alvarez, previous	KAG1	4.70

employees of Hammocks Community Association.

03/05/23	Draft and send email to Michael Provenzale about having a call with Jesmany Jomarrón on SW 104th Fl Partners BOD goals and Danton/Hammocks goals for BOD seats, elections, description of allocation of seats in Charter/Condo docs	RHS1	0.10
03/05/23	Follow up email to Judge Gersten to set the next call regarding the Sarmina lawsuit with Eric, myself, and possibly Melanie Damian	RHS1	0.10
03/06/23	Review and respond to Kris Godwin letter re: information .1; review and respond to Andrew Weiner email re: pool contracts and review contracts .3; review and respond to Andrew Weiner re: Avid .1; review and respond to Jesmany Jomarron email re: AC meeting .1; review and respond to Jesmany Jomarron email re: campaign rules .1; review and respond to Andrew Weiner email re: pool service .1; review and respond to Eric Thompson email re: campaign rules .1; review and respond to Russell Landy email re: lake Doctors .1; review and respond to Eric Thompson email re: stipulation for substitution .1; review and respond to email from Rebecca Stone re: Centaro case .1; review and respond to Russell Landy re: car at mechanic .1; review and respond to Jesmany Jomarron email re: campaign rules .1; review and respond to Carlos Villalobos re: request re: attorneys .1; review Avid system bill paying .2; review and respond to Jesmany Jomarron email re: campaign .1; review and respond to Andrew Weiner re: signed contract .1; review and respond to Russell Landy email re: car mechanic .1; review and respond to Rebecca Stone re: files of law firm .1; review and respond to Andrew Weiner email re: car issue .1; review and respond to Maia Aron email re: case discussion .1; review and respond to email from Eric Thompson re: property .1; and review and respond to Eric Thompson email re: pool cleaning companies .1	DMG2	2.50
03/06/23	Completed research of real estate assets, court actions (civil and criminal), and public documents of Danny Bravo and began Luis Casamayor, previous employees of Hammocks Community Association.	KAG1	1.50
03/06/23	Completed research of real estate assets, court actions (civil and criminal), and public documents of Luz Alzate, Olga Alzate, Hugo Barbeito, Amanda Barbon, Kelvin Bencosme and Kevin Bermudez, previous employees of Hammocks Community Association.	KAG1	3.20
03/06/23	Communication with E. Thompson regarding Hammocks Community employee research resources.	KAG1	0.10
03/06/23	Several email correspondence with M. Aron regarding that OC agreed to an order to set aside clerks default, send Maia a proposed order	RHS1	0.10

	template to set aside clerk's default		
03/06/23	Call with Russell Landy to find out if a records request was sent to Sarmina Centro, what the result was, if they provided documents	RHS1	0.10
03/06/23	Draft and send email to D. Gersten and Eric Thompson following call with Russell Landy advising that a records request letter was sent to Sarmina Centro and that Andrew Centro called but did not produce any documents in response to the request	RHS1	0.10
03/06/23	Several emails with Judge Gersten on obtaining records and Andrew Centro's communications with Hammocks; detailed email to Russell Landy on obtaining the records through the Danton case	RHS1	0.40
03/06/23	Analyze pool service vendor proposals provided by Andrew Weiner (First Service Residential) in furtherance of evaluating same for selection of pool service vendor (and email correspondence with D. Gersten regarding same)	ERT	0.30
03/06/23	Telephone conference with Advisory Committee counsel (Jesmany Jomarron, Esq.) regarding strategy as to potential Board election rules (as requested by D. Gersten)	ERT	0.60
03/06/23	Email correspondence with Maia Aron, Esq. regarding Stipulation for Substitution of Counsel (and Receiver's Consent to same) in the case styled Toorak Capital Partners, LLC v. Yero, Case No. 2020-025327-CA-01	ERT	0.10
03/07/23	Review and respond to Eric Thompson e,]mail re: Mr. Zimmelman communication .1; review and respond to Eric Thompson email re: pool service(s) contracts .1; review and respond to Eric Thompson email re: new case .1; review and respond to Jesmany Jomarron email re: election procedures .1; review and respond to Adam Ruff email re: note and mortgage .1; review and respond to Eric Thompson re: pool contract .1; and review and respond to Adam Ruff email re: Guzman case .1	DMG2	0.70
03/07/23	Communication with E. Thompson regarding refocus of research proposed by Judge Gersten.	KAG1	0.10
03/07/23	Communication with Jesmany Jomarron to set up meeting with him and E. Thompson regarding research focus.	KAG1	0.10
03/07/23	Attend hearing on Plaintiff's Motion for Leave to File Amended Complaint and Motion to Compel Responses to P's First Set of ROGs, DLJ Mortgage v. Arancibia, et al., Case No.: 2020-006211-CA-01	RHS1	0.40

03/07/23	Receive and review Plaintiff's notice of filing copy of the original note and certified copy of mortgage, review email sent to M. Aron attaching, DLJ Mortgage Capital v. Hammocks (Trujillo), Case No.: 2023-000769-CA01	RHS1	0.10
03/07/23	Email correspondence with Eric Zimelman, Esq. (counsel for the new owner of 11570 SW 148 Ct., The Kruzim Group 2, LLC) regarding Kruzim's request for the amount of association fees owed by the prior owner so that Kruzim can bring the account current	ERT	0.10
03/07/23	Email correspondence with Andrew Weiner (First Service Residential) regarding: 1) request by the new owner of 11570 SW 148 Ct., The Kruzim Group 2, LLC, for the amount of association fees owed by the prior owner (so that Kruzim can bring the account current); and 2) scope of work proposed by potential pool vendor McGrath (to assist in evaluating all ppool vendor proposals provide by Mr. Weiner)	ERT	0.40
03/07/23	Begin to draft Supplement to Motion for Relief from: 1) Orders Finding Liability and Awarding Damages [D.E. #328, #339, #477, #480]; and, 2) Final Judgment [D.E. #521] (to be filed in the bankruptcy court in the case styled In re: Josue Cepero, et al., Case No. 17-20358-BKC-LMI)) (draft the following section: 1) Section I-Preface, pp. 1-2; begin to draft the following section: 1) Section II-The New Evidence, pp. 2-4)	ERT	2.40
03/08/23	Attend and conduct zoom advisory committee meeting 1.4; review proposed budget(s) ; conference with Melanie Damian and Eric Thompson re: big budget items re: appropriate .4; review and respond to Steve Katz re: estoppel letter .1; review and respond to email from Maia Aron re: note and mortgage .1; review and respond to email from Maia Aron re: conference re: collection of funds .1; review and respond to email from Chick Ardisson re: campaign .1; review and respond to email from Ken Murena re: insurance put on notice re: defense .1; and analysis of latest budget proposal 1.7	DMG2	4.00
03/08/23	Completed research of real estate assets, court actions (civil and criminal), and public documents of Luis Casamayor (completed), Francisco Calderon, Daniella Cardoza, Tomas I. Castano, Ovidio L. Chaviano, Christian Cochran, Cinthia Cole, Carlos J. Cortes, Lee Costigan and started Elier Diaz, previous employees of Hammocks Community Association.	KAG1	7.30
03/08/23	Draft and send follow up emails to Jesmany Jomarrón and William McCaughan and Michael Provenzale and attaching Michael Provenzale's information and the Complaint from SW 104th FL Partner's v. Hammocks for a conference this week on Michael's client's case issues which cross over into matters in the Danton v. Hammocks case	RHS1	0.10

03/08/23	Multiple correspondences from and responding to with Judge Gersten regarding SW 104th FL Partners and the numerous Hammocks foreclosure cases against Homeowners where the temporary stays are expiring	RHS1	0.30
03/08/23	Conference with Russell Landy on Sarmina Centraro Law Group invoices and reopening discovery in the County Court Case, list of files to search of the files DVVLP has scanned from Hammocks	RHS1	0.30
03/08/23	Draft and send email to Jones, Nadine and Amy Pacas-Kamrowski regarding initial contact with EEOC, defense of charge and possible mediation	RHS1	0.20
03/08/23	Continue drafting Supplement to Motion for Relief from: 1) Orders Finding Liability and Awarding Damages [D.E. #328, #339, #477, #480]; and, 2) Final Judgment [D.E. #521] (to be filed in the bankruptcy court in the case styled In re: Josue Cepero, et al., Case No. 17-20358-BKC-LMI)) (continue drafting the following section: 1) Section II-The New Evidence, pp. 2-4)	ERT	0.40
03/08/23	Attend (remotely, via Zoom) meeting with D. Gersten, Hammocks advisory board, and co-counsels (Jesmony Jomarron, Esq. and Michael Kaufman, Esq.) to continue to discuss strategy/action items going forward (attended only portion of meeting)	ERT	0.60
03/08/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq.) to discuss preparation of proposed budget	ERT	0.30
03/09/23	Review and respond to Rebecca Stone email re: case .1; review and respond to Eric Thompson email re:meeting with Maia Aron's firm re: collections .1; review and respond to Eric Thompson email re: Loancare case .1; review and respond to Rebecca Stone re: new case .1; review and respond to Russell Landy email re: Rasco Clock firm .1; revel and respond to email form Russell Landy re: Hilton Napoleon .1; review and respond to email form Eric Thompson re: Eric Sim .1; review and respond to email form Andrew Weiner re: terminate pool service .1; review and respond email from Andrew Weiner re: new pool service .1; review and respond to email form Maia Aron re: meting re: collections .1; email to Melanie Damian, Eric Thompson and Jesmany Jomarron re: election .1; and review and respond to Melanie Damain email re: section procedures .1	DMG2	1.20
03/09/23	Completed research of real estate assets, court actions (civil and criminal), and public documents of Elier Diaz (completed), Sara Maria Diez, Heniy L. Dixon, Juan Domas, and started Esther G. Dominguez, previous employees of Hammocks Community Association.	KAG1	3.10

03/09/23	Meeting with Eric Thompson and Jesmany Jamarron to discuss research completed, shift of current research focus, and strategy for lien research.	KAG1	1.00
03/09/23	Communication to deliver research to E. Thompson and J. Jamarron in anticipation of meeting.	KAG1	0.10
03/09/23	Draft and send email to Eric Thompson and Judge Gersten summarizing the conference call with Jesmany Jomarrón and Michael Provenzale	RHS1	0.30
03/09/23	Attend conference call with Jesmany Jomarrón and Michael Provenzale to discuss the elections, Class E BOD seats, possibly redrafting the Declaration and Condo Docs, conference to introduce and communicate each other's positions	RHS1	0.30
03/09/23	Receive and respond to emails from M. Aron on Toorak v. Hammocks et al, Case No.: Hammocks 2020-25327-CA01 and Judge Gersten's execution of the stipulation for substitution of counsel and M. Aron appearing on 2020-25383-CA01 (both Toorak cases) and statuses thereof all three cases	RHS1	0.20
03/09/23	Draft and send email to Hilton Napoleon attaching proposed Amended Order on Gallego, Marglli and Hammocks Community Assoc., Inc. v. Ivette Perez and Carlos Luffi, Case No.: 20-23064 CA 25	RHS1	0.10
03/09/23	Draft proposed Amended Order on Motion to Withdraw specifying the Hilton Napoleon is still counsel of record for Gallego	RHS1	0.20
03/09/23	Multiple correspondence received and responded to Judge Gersten regarding SW 104th FL Partners and dismissal of action and the numerous Hammocks foreclosure cases pending against homeowners where the temporary stays are expiring and we need to decide whether to proceed or dismiss	RHS1	0.30
03/09/23	Draft and send email to M. Aron attaching new bank foreclosure action where Hammocks named as a defendant, Loancare v. Mardini, and request if her Firm can take the assignment	RHS1	0.10
03/09/23	Review Order on Hilton's Motion to Withdraw heard 2-21-2023 and review that the order submitted by Hilton and entered by the Court is not accurate	RHS1	0.10
03/09/23	LexisNexis research to confirm that a first voluntary dismissal without prejudice does not act as a judgment or final disposition or adjudication on the merits for the purposes of Fla. Stat. 1.442 or Fla Stat. 768.79,	RHS1	0.50

Hammocks and Gallego v. Perez Luffi, Case No.: 2020-23064-CA01(25)

03/09/23	Review Hilton's 1/18/2023 Motion to withdraw filed with the Court in connection with correcting the order entered on his withdrawal to reflect he is not counsel for Hammocks but remains counsel for Gallego, Case No. 20-23064 CA 01(25)	RHS1	0.10
03/09/23	Receive and analyze email from M. Aron with 2 attachments of financial information (20 pages) for 15581 SW 112 Drive, Case No.: 2017-16946-CA01; draft and send short reply	RHS1	0.20
03/09/23	Look email from SBK Legal with Association Account numbers and the corresponding property addresses; draft and send email to A. Weiner with attachment requesting verification of payment information and that recent check from homeowner for \$6k cleared and account is current as of February 7, 2023	RHS1	0.20
03/09/23	Telephone conference with Advisory Committee counsel (Jesmany Jomarron, Esq.) and K. Godwin regarding strategy for research of prior foreclosure cases for potential fraud by prior Board members, insiders and attorneys (attended only a portion of thecall)	ERT	0.80
03/09/23	Email correspondence with Eric Zimelman, Esq. (counsel for the new owner of 11570 SW 148 Ct., The Kruzim Group 2, LLC) regarding Kruzim's request for the amount of association fees owed by the prior owner so that Kruzim can bring the account current	ERT	0.10
03/09/23	Telephone conference with Advisory Committee counsel (Michael Kaufman, Esq.) regarding revisions to Affidavit of Ana Danton (to be attached to Supplement to Motion for Relief from: 1) Orders Finding Liability and Awarding Damages [D.E. #328, #339, #477, #480]; and, 2) Final Judgment [D.E. #521] to be filed in the bankruptcy court in the case styled In re: Josue Cepero, et al., Case No. 17-20358-BKC-LMI))	ERT	0.10
03/09/23	Finish drafting Supplement to Motion for Relief from: 1) Orders Finding Liability and Awarding Damages [D.E. #328, #339, #477, #480]; and, 2) Final Judgment [D.E. #521] (to be filed in the bankruptcy court in the case styled In re: Josue Cepero, et al., Case No. 17-20358-BKC-LMI)) (finish drafting the following section: 1) Section II-The New Evidence, pp. 2-4; draft the following section: 1) Section III-Memorandum of Law, pp. 5-8)	ERT	2.90
03/10/23	Review and approve bill payments .2; review and respond to Melanie Damian email re: campaign procedures .1; review and forward storage unit information to Ken Murena .1; review and respond to Jesmany Jomarron email re: election procedures zoom meeting .1; review and	DMG2	1.70

respond to Eric Thompson email re: Eric Zim .1; review and respond to Russell Landy email re: Hilton Napoleon documents .1; review and respond to Jesmany Jomarron email re: ballot .1; review and respond to Maia Aron email re: updates conference re: collections .1; review and respond to Melanie Damian email re: forwarded Truist Bank email .2; review and respond to Russell Landy re: cancel hearing re: Hilton Napoleon .1; review and respond to email re: campaigning .1; review and respond to Chicky Ardisson email re: campaign .1; and review and respond to Russell Landy email re: demand letters from criminal lawyers and review letters for comments .3

03/10/23	Researched property records, liens, and corporate records of 14 properties in Hammocks Community Association, and created table.	KAG1	2.50
03/10/23	Reviewed H. Napoleon's billing records of Hammocks' case charges sent by his counsel.	KAG1	0.60
03/10/23	Drafted and submit records request to Miami-Dade Clerk of Court for all lien history from 2015-2022 in Hammocks Community Association.	KAG1	0.20
03/11/23	Review and respond to Jesmany Jomarron email re: ballot .1; and review latest proposed budget 1.6	DMG2	1.70
03/12/23	Review and approve payments .2; zoom conference with Jesmany Jomarron, Melanie Damian (for significant part of the meeting) and Eric Thompson (for most of meeting) re: finalize campaign procedure, ballots, and rules 3.3; and review and respond to Melanie Damain email re: Truist Bank issue .1	DMG2	3.60
03/12/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Melanie Damian, Esq.) and Advisory Committee counsel (Jesmany Jomarron, Esq.) to discuss strategy with regard to Board voting procedure and campaign rules (attended only portion of the meeting)	ERT	2.50
03/13/23	Conference with Melanie Damian re: privilege .1; conference with Andrew Weiner and Russell Landy re: items to be covered on weekly basis .9; review Melanie Damian email(s) re: campaign rules .2; review proposed motions and orders re: campaign rules .3; conference with Russell Landy re: privilege .2; review and respond to Jesmany Jomarron email re: Mike Kaufman agreement to campaign rules .1; review and respond to Andrew Weiner email re: tree issue .1; review and respond to Andrew Weiner email re: list of items that need attention .1; and review and respond to Melanie Damian email re: budget meeting .1	DMG2	2.10
03/14/23	Review and forward email from DocuSign re: Truist Bank .1; review	DMG2	0.80

and respond to Melanie Damian email re: closed account .1; conference with Maia Aron law firm and legal team re: efforts to collect .2; review and respond to Rebecca Stone email re: re-open county court case .1; review and respond to Jesmany Jomarron email re: no campaign boundary .2; and review and respond to Melanie Damian email re: Lucy Marin .1

03/14/23	Researched release of liens or legal actions for 14 original properties and property records, liens, release of liens or legal actions, and corporate records and tracked within table of 31 properties in Hammocks Community Association.	KAG1	7.60
03/14/23	Receive email from Robert Kelly on Centraro Law Group County Court matter; draft and send email to E. Thompson and Judge Gersten requesting direction for response to Plaintiff or to draft a motion to reopen discovery in the instant matter	RHS1	0.10
03/14/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Melanie Damian, Esq.), Maia Aron, Esq., and Josh Hayden, Esq. to discuss Ms. Aron and Mr. Hayden's potential assistance in recovering monies for the Association	ERT	0.30
03/15/23	Review and respond to Eric Thompson email re: Teresa Straub .1	DMG2	0.10
03/15/23	Communication to deliver access to Hammocks Property Lien Research to E. Thompson and R. Stone.	KAG1	0.10
03/15/23	Researched property records, liens, release of liens or legal actions, and corporate records and tracked within table of 15 properties in Hammocks Community Association.	KAG1	4.60

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	651.00	70.60	45,960.60
ERT	Eric Thompson	Partner	372.00	43.00	15,996.00
KAG1	Krys Godwin	Senior Counsel	325.50	97.40	31,703.70
RHS1	Rebecca Stone	Associate	325.50	33.90	11,034.45

TOTAL FOR SERVICES

\$112,575.00

LESS DISCOUNT
TOTAL FEES

-7,880.25
\$104,694.75

Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/07/23	Outside Printing - VENDOR: Gersten, David M. INVOICE#: CREX5736059602281811 DATE: 2/28/2023 Copies, Fee for scanning at Office Max, 02/07/23/DGersten/KCB1/DL4/	7.83
02/16/23	Outside Printing - VENDOR: Gersten, David M. INVOICE#: CREX5736059602281811 DATE: 2/28/2023 Copies, Fee for scanning services at the UPS store, 02/16/23/DGersten/KCB1/DL4/	3.00
02/16/23	Other - VENDOR: Gersten, David M. INVOICE#: CREX5736059602281811 DATE: 2/28/2023 Miscellaneous, Fee for notary at the UPS store, 02/16/23/DGersten/KCB1/DL4/	10.00
03/02/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-063-35697 DATE: 3/10/2023 FedEx service for 806335697,395276810630,Delivery service fees of 30.41 to Kenneth Murena, 1000 BRICKELL AVE STE 1020/MIAMI FL 33131 re: 5539/matter id 1292668	30.41
	TOTAL EXPENSES	<hr/> \$51.24

GORDON&REES

SCULLY MANSUKHANI

YOUR 50 STATE PARTNER*

1111 Broadway, Suite 1700

Oakland, California 94607

(510) 463-8600

Tax ID: 94-1617026

David Gersten
Judge Beatrice Butchko
100 SE Second Street, Suite 3900
Miami, FL 33131
dgersten@grsm.com

April 19, 2023
ID: GERSP 1292668
Invoice No. 21298801
Gersten, David M.

RE: Danton v. Hammocks Community Association

BILLING SUMMARY THROUGH March 15, 2023

Fees For Professional Services:	\$112,575.00
LESS DISCOUNT	-7,880.25
Total for Professional Services:	104,694.75
Expenses and Advances:	<u>51.24</u>
Current Bill:	\$104,745.99

A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank Name: Wells Fargo Bank, N.A..
Bank Address: 420 Montgomery Street, San Francisco, CA 94104
Beneficiary Account: Gordon Rees Scully Mansukhani, LLP
Account Number: 1301118095
ABA Number (ACH): 121042882
Federal Tax ID: 94-1617026

Domestic and International fund transfer process:
ABA Number (Wires): 121000248
Swift code: Domestic - 121000248
International - WFBIUS6S
Reference: 21298801

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PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

SBK Legal

Steven B. Katz, Esq.
 4450 NW 126th Ave., Ste. 101
 Coral Springs, FL 33065
 (954) 726-0805
 www.sbk.legal

Advisory Board of the Hammocks
 9020 Hammocks Blvd Miami FL
 Miami, FL 33196
 USA

Date: 3/15/2023
 File Number: 1450/000
 Invoice Number: 17966

Re: Advisory Board of the Hammocks

STATEMENT OF ACCOUNT	
Prior Balance	11,750.00
Current Fees	9,375.00
Current Expenses	350.00
Amount Due and Owing to Date	\$21,475.00

Fees

<u>Date</u>	<u>Description of Service</u>	<u>Hours</u>	<u>Amount</u>
02/15/2023	Research Unit Owner Ledgers from TOPS	1.10	82.50
02/16/2023	Prepare and transmit estoppel certificate for 10260 SW 150 Court, #12211. (received check made out to Hammocks for \$250).		250.00
02/17/2023	Conference with Alyson Theale and Melissa Vazquez re: procedural issues as they pertain to the budget notice requirements. Reviewed FL Stat. 720 and the bylaws.	0.80	220.00
02/17/2023	Conference with closing agent re: confirmation that an address is located within the Hammocks. Searched Tops for confirmation.	0.10	27.50
02/17/2023	Conferences with Judge Gersten and Jesmany re: screening the candidates for delinquency. Conference with Andrew Weiner re: access to the FSR ledgers.	0.30	82.50
02/17/2023	Pulled ledgers from Tops for candidate screening.	0.30	22.50
02/19/2023	Conference with Judge Gersten and Melanie re: owner request regarding payments not appearing on the association's ledgers. Requested FSR ledger from Andrew.	0.20	55.00
02/19/2023	Prepare and transmit estoppel certificate for 14724 SW 106 Terrace. (received check in the amount of \$350 made out to the Hammocks)		350.00
02/19/2023	Prepare and transmit estoppel certificate and ledger for 10301 SW 147 Circle, #5 (received check for \$250)		250.00
02/19/2023	Prepare and transmit estoppel certificate and ledger for 10360 SW 150 Court, #12221 (received check made out to the Hammocks for \$250).		250.00
02/19/2023	Completed and submitted FSR form for access to FSR ledgers.	0.10	27.50
02/19/2023	Prepare and transmit estoppel certificate for 15035 SW 109 Street (received check made out the Hammocks for \$250).		250.00
02/19/2023	Draft email to Judge Gersten and Melanie re: owner's claim that Alfaro & Fernandez are holding her money in trust. (15581 SW 112 Drive -- Arriaga)	0.10	27.50
02/20/2023	Prepare and transmit estoppel certificate for 9900 Hammocks Blvd, 103-59 (received check for \$250 made out to Hammocks)		250.00

Date	Description	Rate	Amount
02/20/2023	Compile TOPS unit owner ledgers (5500 unit ledgers total to be pulled)	2.50	187.50
02/21/2023	Compile TOPS unit owner ledgers (5500 unit ledgers)	2.50	187.50
02/22/2023	Review and compile unit owner ledgers from TOPS	2.00	150.00
02/23/2023	Provide unit owner ledgers for case numbers	1.20	90.00
02/23/2023	Prepare estoppel certificate for 15385 SW 104 Ter, #4. (received check in the amount of \$350 made out to the Hammocks)		350.00
02/26/2023	Prepare Tops ledgers for transmittal to FSR.	3.10	232.50
02/26/2023	Prepare estoppel for 10950 SW 151 Place (received check made out to the Hammocks for \$350)		350.00
02/26/2023	Prepare estoppel certificate for 15375 SW 104 Terrace, Unit 7. (received check made out to the Hammocks for \$250).		250.00
02/26/2023	Prepare estoppel for 9706 Hammocks Blvd, 103-33 (received check made out to the Hammocks in the amount of \$250)		250.00
02/26/2023	Prepare estoppel for 14915 SW 104 Street, 24-14 (received check made out to the Hammocks in the amount of \$350)		350.00
02/26/2023	Conference with Alyson Thiele and Melanie re: the possibility of halting the sale of prior owner units.	0.10	27.50
02/27/2023	Updated estoppel for 10421 SW 157 Place, #206 (I added \$150 into the estoppel amount which will be paid to the association at closing).		150.00
02/28/2023	Conference with Jesmany re: election procedures. Researched improper action of boardmembers re: campaign activities. Attended status conference with Judge Butchko.	2.40	660.00
02/28/2023	Research Unit owner ledgers for pending litigation.	1.20	90.00
03/01/2023	Conference with Melissa Vasquez and Alyson Theale re: unit owner's payments which were not getting posted to her ledger (Hodes). Reviewed proof of payments and ledger.	0.30	82.50
03/03/2023	Prepare and transmit estoppel certificate for 10360 SW 10360 SW 150 Court (received check made out to Hammocks for \$250)		250.00
03/06/2023	Review unit owner ledgers from TOPS pro and FSR website for estoppel processing	1.20	90.00
03/07/2023	Review and process unit owner ledgers from TOPS pro and FSR website for estoppel processing.	1.20	90.00
03/08/2023	Telephone correspondence regarding status of estoppel for Monica G. Unit for sale.	0.50	37.50
03/08/2023	Attend Receivership Advisory Committee Meeting #19.	1.70	467.50
03/08/2023	Conference with closing agent re: whether 10385 SW 154 court, Unit 96 was within the Hammocks. Reviewed Tops and public records.	0.20	55.00
03/09/2023	Conference with closing agent for the Hodes unit. She is seeking a zero balance ledger that does not yet exist. Conference with Alyson Thiele re: ability to generate a ledger applying the closing balance from the prior ledger to zero out the new FSR ledger.	0.30	82.50
03/11/2023	Received request for condo questionnaire information. Forwarded on to Andrew Weiner for response.	0.10	27.50
03/13/2023	Conference with FSR re: concerns about the Arriaga ledger. I explained that the FSR ledgers require the closing balances of the prior ledgers to obtain a zero balance on the FSR ledger. Further, I explained that A&F apparently is holding moneys they collected from the owner.	0.20	55.00
03/13/2023	Conference with Judge Gersten, Melanie, Michael and Jesmany re: Monica Ghilardi's attempt to sell her house.	0.10	27.50
03/13/2023	Prepare and transmit estoppel certificate for 10605 Hammocks Boulevard (check received made out to Hammocks for \$350)		350.00
03/13/2023	Prepare and transmit estoppel certificate for 15560 SW 106 Lane, #1305 (received check made out to the Hammocks for \$350)		350.00
03/13/2023	Prepare and transmit estoppel for 10831 SW 147 Court (received check made out to Hammocks in the amount of \$250)		250.00
03/13/2023	Prepare and transmit estoppel certificate for 14775 SW 99 Lane (received check made out to the Hammocks for \$250)		250.00
03/13/2023	Prepare and transmit estoppel certificate for 10385 SW 154 Circle Court, #96 (received check made out to Hammocks in the amount of \$250)		250.00

3/15/2023

1450/000

Advisory Board of the Hammocks

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03/13/2023	Conference with Judge Gersten and Melanie re: seller's request for a waiver of late fees (Cascades)	0.10	27.50
03/13/2023	Research unit owner ledgers for estoppels.	1.20	90.00
03/14/2023	Conference with Ken Murena and Alyson Theale via email re: Nelly Arriaga's claim for about \$2,200. Follow up with FSR team.	0.20	55.00
03/14/2023	Prepare and transmit estoppel for 11153 SW 152 Court (received check made out to Hammocks in the amount of \$350)		350.00
03/14/2023	Research Unit owner ledgers for estoppels	1.20	90.00
03/15/2023	Convert notepad document of all A/R reports for all current owners from TOPS Pro to PDF document for First Service Residential.	6.50	487.50
03/15/2023	Research unit owner ledger for estoppel	1.20	90.00
03/15/2023	Prepare and transmit estoppel for 15821 SW 104 Terrace, Unit 202. (received check made out to SBK Legal for \$350).		0.00
	Total Fees	<u>34.20</u>	<u>\$9,375.00</u>

Expenses

03/07/2023	Cancelled escrow letter for 15330 SW 106 Terrace, Unit 901.	350.00	
	Total Expenses		<u>\$350.00</u>

TOTAL NEW CHARGES

\$9,725.00

Kapila/Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

ANA DANTON V. HAMMOCKS COMM. ASSOC., INC.

Client ID: 90156

Invoice #9767 - 02/28/23

TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
SKB - SURUCHI BANEZ - PRINCIPAL CPA, CIRA, CFE	51.60	428.00	22,084.80
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	29.60	450.00	13,320.00
FDD - FRANK DIAZ-DRAGO - CONSULTANT	36.70	360.00	13,212.00
KJJ - KY JOHNSON - PARAPROFESSIONAL	25.40	196.00	4,978.40
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	1.00	450.00	450.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	33.40	290.00	9,686.00
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	0.30	430.00	129.00
TOTAL	<u>178.00</u>		<u>\$63,860.20</u>
	BLENDED RATE	\$358.77	
	DISCOUNT (17%)*		(8,515.33)
	TOTAL EXPENSES		246.26
TOTAL AMOUNT OF THIS INVOICE			<u>\$55,591.13</u>
	ADJUSTED BLENDED RATE	\$310.93	

* DISCOUNT RELATES TO ALL STAFF RATES, EXCEPT SRK & MMD, BOTH SUBJECT TO CAPPED FLAT RATE OF \$450 PER HOUR

Kapila Building • 1000 South Federal Highway • Suite 200 • Fort Lauderdale FL 33316
• Broward 954-761-1011 • Dade 786-517-5771
Affiliated Office in London, England
www.kapilamukamal.com



Kapila/Mukamal

CPAs, Forensic and Insolvency Advisors

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Phone - 954-761-1011 F - 954-761-1033 www.kapilamukamal.com
EIN #46-5394135

ANA DANTON V. HAMMOCKS COMM. ASSOC., INC.

C/O JUDGE DAVID M. GERSTEN, RECEIVER

VIA EMAIL: DGERSTEN@GRSM.COM;

ETHOMPSON@GRSM.COM

Invoice: 9767

02/28/2023

Client ID: 90156

For Professional Services Rendered Through February 28, 2023

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
02/01/2023	SKB	REVIEW AND ANALYZE POPULAR BANK DOCUMENT PRODUCTION AND UPDATE INVENTORY.	0.60	256.80
02/01/2023	SKB	REVIEW AND ANALYZE STATE ATTORNEY'S DISCOVERY INDEX AND UPDATE TARGET LIST WITH DOCUMENTS REQUESTED FOR VENDORS.	0.70	299.60
02/01/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES	0.80	342.40
02/01/2023	MMD	REVIEW PLEADING FILED BY STATE ATTORNEY OFFICE AND RELATED ARREST AFFIDAVIT AND COMPARE TO DATA IN TARGET TRACKING SCHEDULES TO IDENTIFY AVAILABLE RECORDS TO SUPPORT POTENTIAL CLAIMS.	1.70	765.00
02/01/2023	SRK	UPDATE ON CASE STATUS AND OVERSIGHT	0.20	90.00
02/02/2023	SKB	T/C WITH CASSANDRA PEREZ REGARDING BANK INVENTORY AND MISSING DOCUMENTS FOR BB&T, SUNTRUST AND TRUIST.	0.40	171.20
02/02/2023	SKB	REVIEW AND ANALYZE PRODUCTION OF RECORDS INCLUDING WORKPAPERS AND FINANCIAL RECORDS PRODUCED BY FORMER CPA.	3.80	1,626.40
02/02/2023	SKB	CONTINUE TO REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES.	0.80	342.40
02/02/2023	SKB	REVIEW AND ANALYZE BB&T, SUNTRUST AND TRUIST BANK DOCUMENT PRODUCTION AND UPDATE INVENTORY FROM CASSANDRA PEREZ.	0.90	385.20
02/02/2023	MMD	ATTEND TC WITH COUNSEL RE BANK RECORDS NEEDED.	0.50	225.00
02/02/2023	KJJ	UPDATE BANK INVENTORY WITH DOCUMENTS PRODUCED FROM CASSANDRA PEREZ FOR BB&T, SUNTRUST AND TRUIST BANK ACCOUNTS.	0.70	137.20
02/02/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - COCO TREE SERVICE (1 TRANSACTION)	0.30	58.80
02/03/2023	SKB	CONTINUE TO REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES.	1.90	813.20
02/03/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2016.	0.50	214.00
02/03/2023	MMD	REVIEW CORRESPONDENCE FROM COUNSEL RE ET POL FORM FOR CRIME POLICY. SET UP TEMPLATE FOR CLAIM FORM.	0.70	315.00

02/03/2023	KJJ	UPDATE BANK INVENTORY WITH DOCUMENTS PRODUCED FROM CASSANDRA PEREZ FOR BB&T, SUNTRUST AND TRUIST BANK ACCOUNTS (CONTINUED).	4.70	921.20
02/06/2023	SKB	PARTICIPATE IN T/C WITH NICOLAS DE LA VEGA, J RADAR, COUNSEL AND M. DAVIS REGARDING ACCOUNTING, TAX FILINGS AND AUDITS.	0.40	171.20
02/06/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2016.	2.00	856.00
02/06/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2017.	0.50	214.00
02/06/2023	SKB	REVIEW AND ANALYZE DOCUMENT PRODUCTIONS FROM 2/1/2023 AND 2/6/2023 FROM TD BANK AND CNB. REVIEW AND REVISE BANK INVENTORY.	1.10	470.80
02/06/2023	SKB	PREPARE RESPONSES AND SUPPORT FOR INSURANCE CLAIM PAPERWORK.	1.10	470.80
02/06/2023	SKB	PREPARE TRANSACTION DETAIL SCHEDULES FOR THREE BROTHERS INC. AND WORLDWIDE BUSINESS SOLUTIONS FOR ACTIVITY AFTER APRIL 26, 2022.	0.80	342.40
02/06/2023	SKB	REVIEW AND REVISE PAYROLL ANALYSIS FROM 2019 THROUGH 2022 PER W-2'S.	1.30	556.40
02/06/2023	MMD	MEETING WITH POTENTIAL AUDITOR CITRINE COOPERMAN.	0.50	225.00
02/06/2023	MMD	STATUS CALL WITH COUNSEL.	0.30	135.00
02/06/2023	MMD	EMAIL TO COUNSEL WITH DOCUMENT REQUEST FOR STATE ATTORNEY WORKPAPERS AND FILES.	0.20	90.00
02/06/2023	MMD	REVIEW DOCUMENTS PROVIDED BY COUNSEL IN RESPONSE TO STATE ATTORNEY WORKPAPERS.	0.70	315.00
02/06/2023	MMD	REVIEW VENDOR FILES OBTAINED FOR THREE BROS REMODELING, A&F MANAGEMENT, COCO TREE SERVICE, WORLDWIDE BUSINESS SOLUTIONS, EXCELLENT SERVICES & WORK.	1.80	810.00
02/06/2023	MMD	ANALYSIS OF RELATIONSHIPS OF BOARD MEMBERS TO VENDORS PAID BY HOA USING PUBLIC RECORDS SEARCHES.	1.90	855.00
02/06/2023	KJJ	REVIEW AND COMPILE INDEX OF DOCUMENTS RECEIVED	0.70	137.20
02/06/2023	JLP	RECEIVE AND ANALYZE BANK INFORMATION INCLUDING BANK STATEMENTS AND RELATED SUPPORTING DOCUMENTATION RELATING TO HAMMOCKS COMMUNITY ASSOCIATION. INVESTIGATE AND ANALYZE BANK STATEMENTS FOR FURTHER ANALYSIS AND RECONSTRUCTION.	0.50	145.00
02/06/2023	JLP	REVIEW AND ANALYSIS OF BANK INVENTORY SCHEDULE. IDENTIFIED MISSING SUPPORTING DOCUMENTS FOR HAMMOCKS COMMUNITY ASSOCIATION BANK ACCOUNTS	0.50	145.00
02/06/2023	JLP	REVIEWED RECEIVED BANK DOCUMENTS AND IDENTIFIED BANK STATEMENTS REQUIRED TO BE SENT TO CFIS FOR DATA EXTRACTION	0.30	87.00
02/06/2023	JLP	READ ARREST AFFIDAVIT AS PART OF BACKGROUND UNDERSTANDING OF CASE.	0.30	87.00
02/06/2023	JLP	PREPARATION OF PAYROLL SCHEDULE USING 2022 PAYROLL	0.80	232.00

		DATA IN ORDER TO IDENTIFY INSIDERS AND PARTIES ASSOCIATED WITH BOARD MEMBERS AND FALSE VENDORS THAT RECEIVED PAYROLL FROM HOA.		
02/06/2023	JLP	PREPARATION OF PAYROLL SCHEDULE USING 2019 PAYROLL DATA IN ORDER TO IDENTIFY INSIDERS AND PARTIES ASSOCIATED WITH BOARD MEMBERS AND FALSE VENDORS THAT RECEIVED PAYROLL FROM HOA.	0.70	203.00
02/06/2023	JLP	PREPARATION OF PAYROLL SCHEDULE USING 2020 PAYROLL DATA IN ORDER TO IDENTIFY INSIDERS AND PARTIES ASSOCIATED WITH BOARD MEMBERS AND FALSE VENDORS THAT RECEIVED PAYROLL FROM HOA.	0.70	203.00
02/06/2023	JLP	PREPARATION OF PAYROLL SCHEDULE USING 2018 PAYROLL DATA IN ORDER TO IDENTIFY INSIDERS AND PARTIES ASSOCIATED WITH BOARD MEMBERS AND FALSE VENDORS THAT RECEIVED PAYROLL FROM HOA.	0.10	29.00
02/06/2023	JLP	REVIEW AND ANALYZE PAYROLL FINANCIAL DATA BETWEEN 2018 - 2019.	0.70	203.00
02/06/2023	JLP	SUMMARIZED FINANCIAL DATA WITHIN THE PAYROLL SCHEDULE FOR REVIEW.	0.40	116.00
02/06/2023	FDD	RECEIVE AND ANALYZE BANK INFORMATION INCLUDING BANK STATEMENTS AND RELATED SUPPORTING DOCUMENTATION FROM BANK.	0.90	324.00
02/06/2023	FDD	ANALYZE BANK RECORDS AND UPDATE BANK STATEMENT INVENTORY.	1.80	648.00
02/06/2023	FDD	ANALYZE BANK RECORDS AND EXTRACT DATA TO SEND TO AIT FOR CONVERSION INTO DATABASE FORMAT.	0.60	216.00
02/06/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - WORLDWIDE BUSINESS SOLUTIONS (8 TRANSACTIONS), COCO TREE SERVICE (151 TRANSACTIONS), THREE BROTHERS REMODELING (5 TRANSACTIONS)	3.80	744.80
02/07/2023	JLP	REVIEW AND ANALYSIS OF SCANNED DOCUMENTS RECEIVED, LOCATED WITHIN THE BACK OFFICE OF THE HAMMOCK OFFICE.	1.50	435.00
02/07/2023	JLP	REVIEW AND ANALYSIS OF SCANNED DOCUMENTS RECEIVED, LOCATED WITHIN VARIOUS BOXES IN THE HAMMOCK OFFICE STORAGE TRAILER.	1.70	493.00
02/07/2023	JLP	REVIEW AND ANALYSIS OF SCANNED DOCUMENTS RECEIVED, LOCATED WITHIN FILE CABINETS, DRAWERS, AND SHELVES IN THE HAMMOCK OFFICE	1.90	551.00
02/07/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2018.	0.20	85.60
02/07/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2019.	0.20	85.60
02/07/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2020.	0.60	256.80
02/07/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2021.	0.40	171.20

02/07/2023	SKB	REVIEW AND ANALYZE BOARD OF DIRECTOR MEETING MINUTES FROM 2022.	0.30	128.40
02/07/2023	SKB	PREPARE SUMMARY SCHEDULES FROM BOD MEETING MINUTES WITH MISSING MINUTES AND LISTING OF LEGAL PROFESSIONALS HIRED IN MINUTES AND DRAFT EMAIL SUMMARIZING HIGHLIGHTS FROM DIGEST.	1.50	642.00
02/07/2023	SKB	REVIEW AND ANALYZE FINDINGS FROM CABINET FILES PRODUCTIONS AND UPDATE VENDOR SCHEDULES ACCORDINGLY.	0.90	385.20
02/07/2023	MMD	CONTINUE TO PREPARE SCHEDULES FOR HAMMOCKS CRIME POLICY CLAIM.	1.80	810.00
02/07/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR CITIBANK ACCT X.9638 FOR JANUARY 2022.	0.50	145.00
02/07/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR CITIBANK ACCT X.9638 FOR MARCH 2019 AND JULY 2019.	0.90	261.00
02/07/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - THREE BROTHERS REMODELING (189 TRANSACTIONS), ALBRI CONSULTING (3 TRANSACTIONS), AYA SERVICE REPAIR (10 TRANSACTIONS), BARTOLO'S BODY SHOP (2 TRANSACTIONS), EXCELLENT SERVICE & WORK (4 TRANSACTIONS)	6.00	1,176.00
02/08/2023	FDD	PREPARE A BANK RECONSTRUCTION FOR HAMMOCKS COMMUNITY ASSOCIATION FOR THE PERIOD FROM JANUARY 2019 THROUGH DECEMBER 2022. ANALYZE BANK RECONSTRUCTION DETAIL AND PREPARE AN ALPHA SORT.	4.20	1,512.00
02/08/2023	SKB	REVIEW AND ANALYZE PRODUCTION FROM ADP INCLUDING W-2'S AND WEEKLY PAYROLL REGISTERS AND UPDATE PAYROLL ANALYSIS SCHEDULE ACCORDINGLY.	1.50	642.00
02/08/2023	SKB	REVIEW AND REVISE BANK INVENTORY UPDATED WITH SIGNATORY INFORMATION.	0.30	128.40
02/08/2023	SKB	REVIEW AND REVISE BANK RECONSTRUCTION WITH MISSING CIT-9638 FILES UPDATED FROM CFIS.	0.30	128.40
02/08/2023	SKB	REVIEW SUPPORT FOR POTENTIAL TARGET DETAIL PURSUED IN INSURANCE CLAIM.	0.30	128.40
02/08/2023	SKB	PREPARE TRANSACTION DETAIL SCHEDULES TO FILE WITH INSURANCE CLAIM FOR COMPUFIX AND A&F MANAGEMENT.	0.50	214.00
02/08/2023	SKB	REVIEW, REVISE AND FINALIZE EXHIBITS TO ACCOMPANY INSURANCE CLAIM FORM.	1.20	513.60
02/08/2023	MMD	COMPILE DRAFT OF EXHIBIT B FOR CRIME POLICY CLAIM AND CONDUCT AND DOCUMENT RESEARCH FOR EACH FALSE VENDOR.	2.80	1,260.00
02/08/2023	JLP	REVIEW AND ANALYSIS OF SCANNED DOCUMENTS RECEIVED WITHIN HAMMOCK OFFICE	0.30	87.00
02/08/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR CITIBANK ACCT X.9638 FOR MARCH 2019 AND JULY 2019.	0.20	58.00

02/08/2023	FDD	ANALYZE BANK INFORMATION INCLUDING BANK STATEMENTS AND SIGNATURE CARDS AND UPDATE BANK RECORD INVENTORY.	1.80	648.00
02/08/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - ALBRI CONSULTING (4 TRANSACTIONS), BARTOLO'S BODY SHOP (10 TRANSACTIONS), CIMA SOLUTIONS (7 TRANSACTIONS), OKEECHOBEE AUTO & BOAT SALES (2 TRANSACTIONS), NIKITI TRADE EQUIPMENT (1 TRANSACTION), EXCELLENT SERVICE & WORK (26 TRANSACTIONS), DANTE CHAUCA (1 TRANSACTION), COMPUFIX (24 TRANSACTIONS), A&F MANAGEMENT (40 TRANSACTIONS)	2.00	392.00
02/09/2023	FDD	ANALYZE BANK RECONSTRUCTION DETAIL FOR HAMMOCKS AND PREPARE AN ALPHA SORT (CONTINUED).	1.20	432.00
02/09/2023	FDD	ANALYZE BANK RECONSTRUCTION DETAIL FOR HAMMOCKS AND PREPARE AN ALPHA SORT (CONTINUED). SUPPLEMENT BANK RECONSTRUCTION WITH DATA FROM THE CHECK REGISTER.	1.50	540.00
02/09/2023	FDD	ANALYZE BANK RECONSTRUCTION DETAIL FOR HAMMOCKS AND SUPPLEMENT BANK RECONSTRUCTION WITH DATA FROM THE CHECK REGISTER (CONTINUED).	1.30	468.00
02/09/2023	FDD	REVIEW GENERAL LEDGER DATA FOR FURTHER ANALYSIS.	0.50	180.00
02/09/2023	FDD	ANALYZE BANK RECONSTRUCTION DETAIL FOR HAMMOCKS AND SUPPLEMENT BANK RECONSTRUCTION WITH DATA FROM THE GENERAL LEDGER. PREPARE ALPHA SORT AND CATEGORIZE TRANSACTIONS.	1.70	612.00
02/09/2023	SKB	FINALIZE EXHIBITS AND SUPPORT TO ACCOMPANY INSURANCE CLAIM.	1.40	599.20
02/09/2023	SKB	REVIEW AND ANALYZE AMERANT BANK DOCUMENT PRODUCTION AND UPDATE INVENTORY AND BANK RECONSTRUCTION ACCORDINGLY.	1.20	513.60
02/09/2023	SKB	RESEARCH LEGAL PROFESSIONALS AND PREPARE SUMMARY SCHEDULE AND 2019 TO 2022 TRANSACTION DETAIL SCHEDULES FOR EACH POTENTIAL TARGET IDENTIFIED.	2.30	984.40
02/09/2023	MMD	ANALYZE ANNUAL WAGES PAID TO ALL EMPLOYEES FOR YEARS 2019-2022. CROSS CHECKS EMPLOYEE NAMES WITH VENDOR TRACKING SCHEDULES AND SUNBIZ DOCUMENTS TO IDENTIFY RELATED PARTIES AND RELATIONSHIPS. (1.90) PREPARE SCHEDULE FOR COUNSEL IDENTIFYING 15 EMPLOYEES RELATED TO BOARD MEMBERS AND/OR VENDORS PAID BY THE HOA THAT RECEIVED MORE THAN \$1.6 MILLION IN COMPENSATION. (.40)	2.30	1,035.00
02/09/2023	MMD	PREPARE 36 EXHIBITS FOR CRIME POLICY CLAIM THAT INCLUDES LIST OF PAYMENTS MADE TO 12 FALSE VENDORS (1.80), SUPPORTING DOCUMENTATION FOR EACH PAYMENT (1.30) AND PUBLIC RECORDS INFORMATION FOR EACH OF THE 12 VENDORS (1.40).	3.90	1,755.00
02/09/2023	MMD	DRAFT EXHIBIT A TO CRIME POLICY CLAIM THAT LISTS ALL BOARD MEMBERS AND EMPLOYEES ASSOCIATED WITH THEFT CLAIM.	1.10	495.00

02/09/2023	MMD	CONTINUE TO DRAFT EXHIBIT B TO CRIME POLICY CLAIM THAT LISTS SUMMARY OF ALL PAYMENTS MADE TO 12 FALSE VENDORS PAID AFTER APRIL 2022 AND INCLUDES DETAILED EXPLANATION FOR PURPOSE OF CLAIM FOR EACH VENDOR.	2.30	1,035.00
02/09/2023	FDD	ANALYZE BANK RECORDS AND EXTRACT DATA TO SEND TO AIT FOR CONVERSION INTO DATABASE FORMAT.	1.00	360.00
02/09/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - PARADISO DISINFECTANT (13 TRANSACTIONS), DECO ENTERPRISES (50 TRANSACTIONS), OFF DUTY SERVICES (50 TRANSACTIONS), RAUL H. GONZALEZ CORTINA (29 TRANSACTIONS)	2.50	490.00
02/10/2023	FDD	ANALYZE BANK RECONSTRUCTION DETAIL FOR HAMMOCKS AND SUPPLEMENT BANK RECONSTRUCTION WITH DATA FROM THE GENERAL LEDGER (CONTINUED). PREPARE ALPHA SORT AND CATEGORIZE TRANSACTIONS (CONTINUED). RECONCILE INTRACOMPANY TRANSACTIONS FOR THE YEARS 2019-2022 FOR 19 BANK ACCOUNTS.	5.60	2,016.00
02/10/2023	SKB	PREPARE SUMMARY OF PROFESSIONAL FEES AND TRANSACTION DETAIL SCHEDULES FOR EACH TARGET FOR 21 PROFESSIONALS TOTALING OVER \$4.8 MILLION.	2.60	1,112.80
02/10/2023	SKB	FINALIZE INSURANCE CLAIM EXHIBITS AND CHARTS.	0.50	214.00
02/10/2023	MMD	FINALIZE 36 CRIME POLICY CLAIM EXHIBITS AND UPLOAD TO SHAREFILE FOR COUNSEL.	1.10	495.00
02/10/2023	MMD	TC WITH COUNSEL RE CRIME POLICY.	0.50	225.00
02/10/2023	MMD	PREPARE UPDATED SCHEDULE OF TRANSFERS FOR PERIOD 2019-2022 TO FALSE AND SUSPICIOUS VENDORS ALONG WITH NOTES REGARDING RELATIONSHIPS OF EACH VENDOR TO HAMMOCKS BOARD MEMBERS AND EMPLOYEES.	1.30	585.00
02/10/2023	MMD	PREPARE GRAPH ILLUSTRATING INCREASED DISBURSEMENTS TO FALSE AND SUSPICIOUS VENDORS IN 2022.	0.60	270.00
02/10/2023	JLP	INVESTIGATED HAMMOCK IDENTIFIED INTERCOMPANY BANK TRANSFERS BETWEEN BANKS TO ENSURE VALIDITY	1.70	493.00
02/10/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO HILTON NAPOLEON II PA, ALFARO & FERNANDEZ, AND JAUREGUI LAW.	2.80	812.00
02/10/2023	SRK	CASE OVERSIGHT AND REVIEW ANALYSIS PROVIDED TO COUNSEL	0.30	135.00
02/12/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO ALFARO & FERNANDEZ, RICARDO HERMIDA, AND QUINTERO BROCHE.	3.40	986.00
02/13/2023	FDD	UPDATE BANK RECONSTRUCTION FOR HAMMOCKS.	0.30	108.00
02/13/2023	FDD	ANALYZE AND INVESTIGATE PAYMENTS MADE TO ALFARO & FERNANDEZ AS RECORDED IN THE GENERAL LEDGER AS COMPARED TO THE BANK RECONSTRUCTION TO DETERMINE HOW 75% OF THE TOTAL PAYMENTS REFLECTED IN GENERAL LEDGER THAT WERE NOT REFLECTED IN BANK RECONSTRUCTION WERE ACCOUNTED FOR IN THE GENERAL	2.70	972.00

LEDGER.				
02/13/2023	SKB	REVIEW AND REVISE BANK RECONSTRUCTION OF PRIORITY BANK ACCOUNTS FOR 2019 TO 2022 CASH ACTIVITY.	0.70	299.60
02/13/2023	SKB	REVIEW AND ANALYZE ALFARO & FERNANDEZ PROFESSIONAL FEES FOR CHECK NUMBERS NOT PROVIDED IN CHECK REGISTER AND RECONCILE TO GENERAL LEDGER.	0.40	171.20
02/13/2023	MMD	REVIEW SCHEDULE OF PAYMENTS FOR LEGAL FEES MADE BY HOA AND RELATED AVAILABLE INVOICE DOCUMENTATION. ADD NOTES REGARDING PARTIES REPRESENTED BY LAWYERS.	1.40	630.00
02/13/2023	MMD	DRAFT EMAIL TO COUNSEL RE LEGAL FEES PAID BY HOA.	0.20	90.00
02/13/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - ENDLESSLY HANDY (59 TRANSACTIONS FROM TD BANK ACCOUNT #3259)	1.50	294.00
02/13/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO JOHN PAUL ARCIA & LAW OFFICES OF MIGUEL PARLA.	1.20	348.00
02/13/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO RASCO KLOCK PEREZ, ACE LAW, SANTIAGO LEGAL, MARSHALL, DENNEHEY, WARNER, ROBERTO PARDO, & MARIN,ELJAIK,LOPEZ & MARTIN.	2.60	754.00
02/13/2023	SRK	LEGAL FEES ANALYSIS	0.20	90.00
02/13/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - JUGY'S CLEANING SERVICE (122 TRANSACTIONS FROM TD BANK ACCOUNT #3259)	1.70	333.20
02/14/2023	FDD	UPDATE BANK RECONSTRUCTION FOR HAMMOCKS, REVIEWING ACCOUNT 8151, 8144, 0426, 0434 AND 9949 FOR THE PERIOD FROM JANUARY 2019 THROUGH DECEMBER 2022.	2.30	828.00
02/14/2023	SKB	REVIEW AND FINALIZE SUPPORT FOR INSURANCE CLAIM.	0.30	128.40
02/14/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO MARIN,ELJAIK,LOPEZ & BASULTO ROBBINS & ASSOCIATE.	0.90	261.00
02/14/2023	KJJ	EXTRACT DISBURSEMENT SUPPORT FOR TARGETS IDENTIFIED IN AFFIDAVIT OF ARREST - ENDLESSLY HANDY (73 TRANSACTIONS FROM TD BANK ACCOUNT #3259)	1.50	294.00
02/15/2023	FDD	UPDATE BANK RECONSTRUCTION FOR HAMMOCKS, REVIEWING ACCOUNT 0106, 1178 AND 6874 FOR THE PERIOD FROM JANUARY 2019 THROUGH DECEMBER 2022. UPDATE ALPHA SORT AND CATEGORIZE TRANSACTIONS. ANALYZE BANK RECONSTRUCTION DETAIL AND RECONCILE INTRACOMPANY TRANSACTIONS.	1.80	648.00
02/15/2023	FDD	UPDATE BANK RECONSTRUCTION FOR HAMMOCKS WITH MISSING BANK ACTIVITY FOR ACCOUNT 6579, 2206, 1164, 1009, 1020, AND 1151. PREPARE ALPHA SORT AND CATEGORIZE TRANSACTION FOR THE PERIOD BETWEEN 2019 AND 2022.	3.10	1,116.00
02/15/2023	MMD	ATTEND TO CRIME INSURANCE POLICY CLAIM SUPPORT.	0.10	45.00

02/15/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO BASULTO ROBBINS & ASSOCIATE AND POLLACK, POLLACK & KOGAN LLC.	1.10	319.00
02/16/2023	RLW	PREPARE BANK RECONSTRUCTION	0.30	129.00
02/16/2023	SKB	PREPARE BANK RECONSTRUCTIONS FOR 19 BANK ACCOUNTS WITH ACTIVITY FROM 2019 THROUGH 2022 (2.4 HOURS). RESEARCH AND POPULATE ALPHA SORT AND CATEGORIES (2.4 HOURS).	4.80	2,054.40
02/16/2023	MMD	PREPARE STATUS NARRATIVE FOR RECEIVER AND COUNSEL.	0.50	225.00
02/16/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO WORLDWIDE BUSINESS SOLUTION.	1.50	435.00
02/17/2023	SKB	CONTINUE TO PREPARE BANK RECONSTRUCTION FOR 19 BANK ACCOUNTS WITH ACTIVITY FROM 2019 THROUGH 2022 (2.8 HOURS). RESEARCH AND POPULATE ALPHA SORT AND CATEGORIES (2.9 HOURS).	5.70	2,439.60
02/17/2023	MMD	PREPARE SUMMARY OF LEGAL FEES PAID BY YEAR INCLUDING NUMBER OF FIRMS AND AMOUNTS PAID EACH YEAR AND DRAFT EMAIL TO COUNSEL RE SAME.	0.60	270.00
02/17/2023	SRK	CASE OVERSIGHT, REVIEW AND CONSIDER EMAIL COMMUNICATIONS WITH RECEIVER AND RECEIVER'S COUNSEL RE INTERIM REPORT AND LEGAL FEES ANALYSIS	0.30	135.00
02/19/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO WORLDWIDE BUSINESS SOLUTION.	1.70	493.00
02/20/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO WORLDWIDE BUSINESS SOLUTION.	1.10	319.00
02/22/2023	FDD	ANALYZE DEPOSIT TRANSACTIONS REFLECTED IN THE GENERAL LEDGER AND RECONCILE TO THE BANK RECONSTRUCTION.	2.30	828.00
02/22/2023	SKB	PARTICIPATE IN DOCUMENT MANAGEMENT TRAINING WITH DISCO ONBOARDING TEAM.	0.70	299.60
02/22/2023	SKB	REVIEW AND PREPARE COMPARISON ANALYSIS OF PAYROLL PAID PER BANK RECONSTRUCTION AND PER PAYROLL REPORTS /W-2'S AND DRAFT SUMMARY OF FINDINGS EMAIL FOR PAYROLL AND DEPOSITS FINDINGS.	1.40	599.20
02/22/2023	SKB	REVIEW AND REVISE PROFESSIONAL ANALYSIS AND SUPPORTING BANK DOCUMENTS FOR RELATED TRANSACTIONS.	1.10	470.80
02/22/2023	SKB	FINALIZE BANK INVENTORY TO PROVIDE COUNSEL UPDATE.	0.40	171.20
02/22/2023	JLP	IDENTIFY AND EXTRACT BANK STATEMENT TRANSACTION SUPPORT AND CHECK SUPPORT RELATING TO PROFESSIONAL FEES PAID BY HAMMOCK TO WORLDWIDE BUSINESS SOLUTION, JIJ PROFESSIONAL SERVICES INC, AND AGUIAR	3.40	986.00

CABRERA MACEO & CO.				
02/23/2023	FDD	ANALYZE DEPOSIT AND MERCHANT TYPE TRANSACTIONS AND EXTRACT SUPPORTING DOCUMENTATION FOR FURTHER REVIEW.	1.60	576.00
02/23/2023	SKB	REVIEW AND ANALYZE EXAMPLE DEPOSIT SUPPORT TO PROVIDE TO COUNSEL.	1.40	599.20
02/23/2023	MMD	REVIEW EMAIL FROM COUNSEL WITH INFORMATION REQUEST FROM POPULAR BANK. REVIEW HOA RECORDS AND DRAFT RESPONSE AND ATTACH RESPONSIVE DOCUMENTS.	0.80	360.00
02/28/2023	FDD	REVIEW A/R REPORTS IN TOPS FOR FURTHER ANALYSIS.	0.50	180.00
02/28/2023	SKB	INVESTIGATE USES OF FUNDS FROM VENDORS TO DETERMINE REAL ESTATE PURCHASES AND FOLLOW-UP WITH COUNSEL ON DOCUMENT REQUEST FROM STATE ATTORNEY AND AFFIDAVIT OF ARREST FROM PRIOR CASE.	0.50	214.00
02/28/2023	SKB	RESEARCH AND ADDRESS EMAIL REGARDING DISCO TRAINING AND DOCUMENT UPLOADS.	0.40	171.20
				63,860.20
				63,860.20
EXPENSES				
02/01/2023	EXP	PACER - JANUARY 2023		0.60
02/06/2023	EXP	ACTIONABLE INTELLIGENCE TECHNOLOGIES - INV 2867 - FEBRUARY 2023		116.40
02/09/2023	EXP	ACTIONABLE INTELLIGENCE TECHNOLOGIES - INV 2867 - FEBRUARY 2023		114.00
02/28/2023	EXP	SHAREFILE - FEBRUARY 2023		3.26
02/28/2023	EXP	PRINTED COPIES - FEBRUARY 2023 (02/01/23-02/28/23)		12.00
				246.26
				246.26

Discount (17%) (8,515.33)

Total amount of this invoice \$55,591.13

OPTIONAL WIRE/ACH INSTRUCTIONS	
Bank Name:	The Northern Trust Company 1100 East Las Olas Blvd. Fort Lauderdale, FL 33301-2387 Phone: 954-768-4053 Fax: 954-768-4017
Bank ABA Routing:	071000152
Swift Code:	CNORUS44
Account Name:	KAPILAMUKAMAL, LLP
Account Number:	1171120036

Invoice payable upon receipt. Thank you for this opportunity to be of service.



INVOICE

Invoice # 7060
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00993-Gersten

Hammocks - 17-21263-CA

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/06/2023	Review status of case.	0.10	\$400.00	\$40.00
Service	MA	02/11/2023	Review email from R. Stone and respond to same.	0.20	\$400.00	\$80.00
Service	MA	02/12/2023	Review email from R. Stone re filings in case.	0.20	\$400.00	\$80.00
Service	MA	02/13/2023	Review docket to determine status of case.	1.30	\$400.00	\$520.00
Service	MA	02/13/2023	Draft notice of appearance and notice of filing receiver order.	0.30	\$400.00	\$120.00
Service	MA	02/14/2023	Prepare for Alfaro's motion to withdraw (0.2) and attend hearing and make ore tenus motion to stay (0.3).	0.50	\$400.00	\$200.00
Service	MA	02/14/2023	Draft order granting ore tenus motion to stay and send same to all counsel.	0.30	\$400.00	\$120.00
Service	MA	02/14/2023	Review Alfaro's withdrawal order, revise same, and send back to Alfaro.	0.20	\$400.00	\$80.00
Service	MA	02/14/2023	Review email from Plaintiff's counsel and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Send email to V. Vazquez re uploading order on motion to stay to court.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Review order staying case and add to master list.	0.10	\$400.00	\$40.00

Service	VV	02/14/2023	Submit Order Granting Receiver's Ore Tenus Motion to Stay	0.40	\$200.00	\$80.00
Service	MA	02/16/2023	Review order granting Alfaro's withdrawal.	0.10	\$400.00	\$40.00
Service	MA	02/17/2023	Search for information to put in list for properties I need assessment information on.	0.10	\$400.00	\$40.00
Quantity Subtotal						4.0

Time Keeper	Quantity	Rate	Total
Maia Aron	3.6	\$400.00	\$1,440.00
Viviana Vazquez	0.4	\$200.00	\$80.00
Quantity Total			4.0
Subtotal			\$1,520.00
Total			\$1,520.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7060	05/31/2023	\$1,520.00	\$0.00	\$1,520.00
Outstanding Balance				\$1,520.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$1,520.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7059
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00992-Gersten

Hammocks - 19-4907-CA

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/17/2023	Review docket.	0.90	\$400.00	\$360.00
Service	MA	02/17/2023	Draft notice of appearance and notice of filing receiver order.	0.30	\$400.00	\$120.00
Service	MA	02/17/2023	Search for information to put in list for properties I need assessment information on.	0.10	\$400.00	\$40.00
Service	VV	02/21/2023	Finalize and e-file Notice of Appearance and Notice of Filing	0.50	\$200.00	\$100.00
Quantity Subtotal						1.8

Time Keeper	Quantity	Rate	Total
Maia Aron	1.3	\$400.00	\$520.00
Viviana Vazquez	0.5	\$200.00	\$100.00
Quantity Total			1.8
Subtotal			\$620.00
Total			\$620.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7059	05/31/2023	\$620.00	\$0.00	\$620.00
			Outstanding Balance	\$620.00
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$620.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7058
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00991-Gersten

Hammocks - 20-22065-CA

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/14/2023	Review docket.	1.00	\$400.00	\$400.00
Service	MA	02/14/2023	Draft notice of appearance and notice of filing Receiver Order and send to V. Vazquez to file.	0.30	\$400.00	\$120.00
Service	VV	02/14/2023	Finalize, e-file and e-submit Notice of Appearance, Notice of Filing and Emergency Motion to Stay	0.60	\$200.00	\$120.00
Service	MA	02/14/2023	Draft emergency motion to stay; Review Judge's procedures for emergency motions and send email to V. Vazquez for instructions re emergency motion.	0.50	\$400.00	\$200.00
Service	MA	02/14/2023	Review email from court re emergency motion to stay hearing and send email to V. Vazquez re preparing notice of hearing.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Review email from Plaintiff's counsel and respond to same.	0.30	\$400.00	\$120.00
Service	MA	02/14/2023	Send update to R. Stone.	0.10	\$400.00	\$40.00
Service	VV	02/14/2023	Prepare, finalize and e-file Notice of Hearing	0.60	\$200.00	\$120.00
Service	MA	02/16/2023	Review email from Plaintiff's counsel (0.1); Send email to R. Stone (0.1).	0.20	\$400.00	\$80.00
Service	MA	02/16/2023	Review email from R. Stone and respond to	0.10	\$400.00	\$40.00

			same.			
Service	MA	02/17/2023	Confer with counsel for Plaintiff.	0.20	\$400.00	\$80.00
Service	MA	02/17/2023	Search for information to put in list for properties I need assessment information on.	0.10	\$400.00	\$40.00
Service	MA	02/17/2023	Send update to R. Stone.	0.30	\$400.00	\$120.00
Service	MA	02/17/2023	Review email from Plaintiff's counsel and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/21/2023	Review Plaintiff's motion to take judicial notice.	0.10	\$400.00	\$40.00
Service	MA	02/21/2023	Review email from Plaintiff's counsel and respond to same (0.2); Send update to R. Stone (0.1); Send email to D. Cohen re preparation in case she has to cover hearing tomorrow (0.2).	0.50	\$400.00	\$200.00
Service	MA	02/21/2023	Review Plaintiff's motions to compel Condo. Assoc.	0.20	\$400.00	\$80.00
Service	MA	02/22/2023	Attend hearing on Receiver's emergency motion to stay.	0.70	\$400.00	\$280.00
Service	MA	02/22/2023	Confer with R. Stone.	0.20	\$400.00	\$80.00
Service	MA	02/22/2023	Draft order granting Receiver's motion to stay and send to counsel.	0.30	\$400.00	\$120.00
Service	MA	02/22/2023	Send update to client.	0.40	\$400.00	\$160.00
Service	MA	02/22/2023	Review email from counsel; Revise order granting stay and send to counsel; Send order to V. Vazquez to send to Court.	0.20	\$400.00	\$80.00
Service	VV	02/22/2023	Submit Proposed Order	0.40	\$200.00	\$80.00

Quantity Subtotal 7.5

Time Keeper	Quantity	Rate	Total
Maia Aron	5.9	\$400.00	\$2,360.00
Viviana Vazquez	1.6	\$200.00	\$320.00

Quantity Total 7.5

Subtotal \$2,680.00

Total \$2,680.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7058	05/31/2023	\$2,680.00	\$0.00	\$2,680.00
Outstanding Balance				\$2,680.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$2,680.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7057
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00990-Gersten

Hammocks - 22-12359-CA

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	VV	02/06/2023	Finalize and e-file Notice of Appearance and Notice of Filing	0.60	\$200.00	\$120.00
Service	MA	02/06/2023	Prepare notice of appearance and notice of filing receiver order and send to V. Vazquez to file.	0.30	\$400.00	\$120.00
Service	MA	02/07/2023	Attend hearing on Alfaro's motion to withdraw and ore tenus motion to stay.	0.30	\$400.00	\$120.00
Service	MA	02/07/2023	Add note re hearing today to memo.	0.10	\$400.00	\$40.00
Service	MA	02/07/2023	Review and revise order granting Alfaro's motion to withdraw; Send same to Alfaro.	0.20	\$400.00	\$80.00
Service	MA	02/07/2023	Review email from R. Stone re meet and confer with Plaintiff's counsel.	0.10	\$400.00	\$40.00
Service	MA	02/16/2023	Review filing by Plaintiff re Alfaro withdrawal order.	0.10	\$400.00	\$40.00
Service	MA	02/17/2023	Search for information to put in list for properties I need assessment information on.	0.10	\$400.00	\$40.00
Service	MA	02/21/2023	Attend hearing on Plaintiff's Motion for Default against unknown spouse and tenants.	0.50	\$400.00	\$200.00
Quantity Subtotal						2.3

Time Keeper	Quantity	Rate	Total
Maia Aron	1.7	\$400.00	\$680.00
Viviana Vazquez	0.6	\$200.00	\$120.00
Quantity Total			2.3
Subtotal			\$800.00
Total			\$800.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7057	05/31/2023	\$800.00	\$0.00	\$800.00
Outstanding Balance				\$800.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$800.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7054
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00979-Gersten

Hammocks 17-15701

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/01/2023	Revise emergency motion to stay and send to V. Vazquez to file.	0.30	\$400.00	\$120.00
Service	VV	02/01/2023	Finalize, e-file and e-submit Renewed Emergency Motion to Stay	0.60	\$200.00	\$120.00
Service	MA	02/01/2023	Draft order per judge's instructions and circulate to all counsel.	0.30	\$400.00	\$120.00
Service	MA	02/02/2023	Revise letter to court and send to V. Vazquez to submit with proposed order staying case.	0.20	\$400.00	\$80.00
Service	VV	02/02/2023	Prepare, finalize and submit cover letter to Judge Sanchez-Llorens	0.70	\$200.00	\$140.00
Service	MA	02/06/2023	Send email to V. Vazquez re calling JA re emergency order.	0.10	\$400.00	\$40.00
Service	MA	02/06/2023	Review order staying case and send update to R. Stone.	0.10	\$400.00	\$40.00
Service	MA	02/07/2023	Review Court's renote of CMC for 4/19.	0.10	\$400.00	\$40.00
Quantity Subtotal						2.4

Time Keeper	Quantity	Rate	Total
Maia Aron	1.1	\$400.00	\$440.00

Viviana Vazquez	1.3	\$200.00	\$260.00
Quantity Total			2.4
Subtotal			\$700.00
Total			\$700.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6841	04/03/2023	\$2,560.00	\$0.00	\$2,560.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7054	05/31/2023	\$700.00	\$0.00	\$700.00

Outstanding Balance	\$3,260.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$3,260.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7053
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00978-Gersten

Hammocks 17-16946

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/16/2023	Review email from Defendant's counsel and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/17/2023	Review materials sent by Defendant's counsel.	0.10	\$400.00	\$40.00
Quantity Subtotal						0.2

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
Quantity Total			0.2
Subtotal			\$80.00
Total			\$80.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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6840	04/03/2023	\$1,140.00	\$0.00	\$1,140.00
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Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7053	05/31/2023	\$80.00	\$0.00	\$80.00
			Outstanding Balance	\$1,220.00
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$1,220.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7056
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00981-Gersten

Hammocks 20-25545

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/01/2023	Review email from E. Thompson and respond to same; Send email to D. Cohen re research project.	0.20	\$400.00	\$80.00
Service	DC	02/01/2023	Research re prevailing party provision and emails related to.	0.20	\$400.00	\$80.00
Service	MA	02/02/2023	Review email from R. Stone (0.1); Send email to Defendants' counsel (0.1).	0.20	\$400.00	\$80.00
Service	MA	02/03/2023	Review email from Defendant's counsel and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/03/2023	Confer with counsel for Defendant.	0.10	\$400.00	\$40.00
Service	MA	02/07/2023	Review email from Defendant's counsel (0.1); Send email to D. Cohen re research re fees (0.1).	0.20	\$400.00	\$80.00
Service	DC	02/08/2023	Research re prevailing party provision and follow up with Maia re same.	0.50	\$400.00	\$200.00
Service	DC	02/10/2023	Review declaration, rules and regulations and other governing documents (.5); review complaint (.2); research re prevailing party provision and risk exposure for dismissing claims (.8).	1.50	\$400.00	\$600.00
Service	MA	02/13/2023	Review and revise memo to client re next steps.	1.00	\$400.00	\$400.00

Service	MA	02/13/2023	Send email to V. Vazquez re obtaining link for Zoom hearing tomorrow.	0.10	\$400.00	\$40.00
Service	MA	02/13/2023	Confer with Defendants' counsel.	0.20	\$400.00	\$80.00
Service	MA	02/13/2023	Confer with D. Cohen in preparation for hearing tomorrow.	0.30	\$400.00	\$120.00
Service	MA	02/13/2023	Review email from R. Stone and respond to same.	0.20	\$400.00	\$80.00
Service	MA	02/13/2023	Confer with R. Stone.	0.30	\$400.00	\$120.00
Service	MA	02/13/2023	Revise memo to client and send.	0.30	\$400.00	\$120.00
Service	MA	02/13/2023	Send email to H. Napoleon re move to withdraw as counsel for the Association.	0.10	\$400.00	\$40.00
Service	VV	02/13/2023	Finalize and e-file Notice of Appearance and Notice of Filing Receiver Order	0.50	\$200.00	\$100.00
Service	DC	02/14/2023	Prepare for hearing and attend same (.8); revise and draft proposed order on same and conference with Maia Aron (.3).	1.10	\$400.00	\$440.00
Service	MA	02/14/2023	Confer with D. Cohen re hearing.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Send email to Defendant's counsel re call.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Review email from Defendant's counsel re call and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Send email to R. Stone and D. Cohen.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Confer with Defendant's counsel.	0.20	\$400.00	\$80.00
Service	MA	02/14/2023	Revise order granting sanctions against Gallego and send them to Defendant's counsel.	0.20	\$400.00	\$80.00
Service	MA	02/14/2023	Send update to R. Stone.	0.10	\$400.00	\$40.00
Service	MA	02/14/2023	Review email from Defendant's counsel re order and send additional revisions to order.	0.20	\$400.00	\$80.00
Service	MA	02/16/2023	Review Court's rejection of Napoleon's proposed order granting motion to withdraw (0.1); Send email to Napoleon asking him to set his motion to withdraw as counsel for the Association for hearing (0.1).	0.20	\$400.00	\$80.00
Service	MA	02/16/2023	Review email from Defendant's counsel and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/16/2023	Review order striking Gallego's pleadings.	0.10	\$400.00	\$40.00
Service	MA	02/16/2023	Review email from Napoleon re setting his	0.10	\$400.00	\$40.00

			motion to withdraw as counsel for the Association for hearing.			
Service	MA	02/17/2023	Review notice of hearing on Napoleon's motion to withdraw.	0.10	\$400.00	\$40.00
Service	MA	02/17/2023	Follow up with Defendant's counsel.	0.10	\$400.00	\$40.00
Service	MA	02/21/2023	Confer with counsel for Defendant (0.1); Send update to R. Stone (0.1).	0.20	\$400.00	\$80.00
Service	MA	02/24/2023	Confer with Defendants' counsel (0.1); Send update to R. Stone (0.1).	0.20	\$400.00	\$80.00
Service	MA	02/28/2023	Review email from R. Stone re strategy, conduct research, and respond to same.	0.50	\$400.00	\$200.00
Quantity Subtotal						9.8

Time Keeper	Quantity	Rate	Total
Maia Aron	6.0	\$400.00	\$2,400.00
Darci Cohen	3.3	\$400.00	\$1,320.00
Viviana Vazquez	0.5	\$200.00	\$100.00
Quantity Total			9.8
Subtotal			\$3,820.00
Total			\$3,820.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6843	04/03/2023	\$2,100.00	\$0.00	\$2,100.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7056	05/31/2023	\$3,820.00	\$0.00	\$3,820.00
Outstanding Balance				\$5,920.00
Amount in Trust				\$0.00

Total Amount Outstanding \$5,920.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7055
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00980-Gersten

Hammocks 21-19372

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/01/2023	Review email from Plaintiff's counsel re no surplus and respond to same.	0.10	\$400.00	\$40.00
Service	DC	02/01/2023	Review emails re sale and surplus funds.	0.10	\$400.00	\$40.00
Service	MA	02/06/2023	Send update to R. Stone.	0.10	\$400.00	\$40.00
Service	MA	02/12/2023	Review Plaintiff's response to motion to stay.	0.30	\$400.00	\$120.00

Quantity Subtotal 0.6

Time Keeper	Quantity	Rate	Total
Maia Aron	0.5	\$400.00	\$200.00
Darci Cohen	0.1	\$400.00	\$40.00

Quantity Total 0.6

Subtotal \$240.00

Total \$240.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6842	04/03/2023	\$1,280.00	\$0.00	\$1,280.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7055	05/31/2023	\$240.00	\$0.00	\$240.00

Outstanding Balance \$1,520.00

Amount in Trust \$0.00

Total Amount Outstanding \$1,520.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7052
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00974-Gersten

Hammocks 22-13543

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/01/2023	Review email from defendants' counsel re order granting stay and submit same to Court.	0.10	\$400.00	\$40.00
Service	VV	02/01/2023	Finalize and submit Order RE: Motion to Stay	0.40	\$200.00	\$80.00
Service	MA	02/01/2023	Review and revise order granting Alfaro's motion to withdraw and send same to Alfaro.	0.10	\$400.00	\$40.00
Service	MA	02/01/2023	Review order granting ore tenus motion to stay; Review email from R. Stone and respond to same.	0.20	\$400.00	\$80.00
Service	MA	02/01/2023	Review proposed order granting Alfaro's motion to withdraw, redline, and respond to same.	0.10	\$400.00	\$40.00
Service	MA	02/06/2023	Review email from R. Stone re update.	0.10	\$400.00	\$40.00
Service	MA	02/06/2023	Send update to R. Stone.	0.10	\$400.00	\$40.00
Quantity Subtotal						1.1

Time Keeper	Quantity	Rate	Total
Maia Aron	0.7	\$400.00	\$280.00

Viviana Vazquez	0.4	\$200.00	\$80.00
		Quantity Total	1.1
		Subtotal	\$360.00
		Total	\$360.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6836	04/03/2023	\$1,780.00	\$0.00	\$1,780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7052	05/31/2023	\$360.00	\$0.00	\$360.00
			Outstanding Balance	\$2,140.00
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$2,140.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 7051
Date: 03/02/2023
Due On: 05/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00973-Gersten

Hammocks 22-14013

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	02/01/2023	Review dismissal; Send email to R. Stone re dismissal.	0.20	\$400.00	\$80.00
Quantity Subtotal						0.2

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
Quantity Total			0.2
Subtotal			\$80.00
Total			\$80.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6835	04/03/2023	\$1,960.00	\$0.00	\$1,960.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7051	05/31/2023	\$80.00	\$0.00	\$80.00
			Outstanding Balance	\$2,040.00
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$2,040.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 90 days.



INVOICE

Invoice # 83
Date: 03/21/2023
Due On: 04/20/2023

The Morgan Law Group, P.A.

55 Merrick Way, Suite 404
Coral Gables, FL 33134
Phone: (305) 569-9900
www.policyadvocate.com

Hammocks Community Association Incorporated

*REDUCE 5% OVERALL
THEN APPROVED*
(DM)

BLT22-0005 - Receivership of Hammocks Community Association Incorporated

BLT22-0005 - Receivership of Hammocks Community Association Incorporated

Services

Date	Attorney	Notes	Quantity	Total
02/16/2023	JJ	Telephone conference with Judge Gersten regarding interview protocol for candidate interviews, Calendly configuration, and drafting of communications to candidates requesting additional information to review and consider.	1.40	\$700.00
02/16/2023	JJ	Reviewed and analyzed all thirteen (13) candidate packages submitted by the board of director candidates.	1.30	\$650.00
02/16/2023	JJ	Revised invitation to member candidates for the board of directors and requested review and approval from the Receiver.	0.30	\$150.00
02/16/2023	JJ	Reviewed and analyzed proposed Consent to Background Check provided by FSR.	0.20	\$100.00

02/16/2023	JJ	Telephone conference with M. Kaufman as instructed by Receiver Judge Gersten (Ret.) concerning next steps for candidate eligibility and communications with advisory committee.	0.80	\$400.00
02/17/2023	JJ	Attend to numerous communications with M. Damian and Receiver Judge Gersten (ret.) revising and finalizing communication to candidates to secure scheduling and attendance of interview, signed consent to a background check, and supporting information such as a résumé, valid identification, and references.	1.50	\$750.00
02/17/2023	JJ	Prepared and finalized Official Communication from Receiver Judge Gersten (ret.) inviting candidates to interview and provide additional information in support of their candidacy.	0.50	\$250.00
02/17/2023	JJ	Received and reviewed recorded certified copy of Agreed Order Voiding 2021 Amendment to the Declaration.	0.10	\$50.00
02/17/2023	JJ	Electronic mail correspondence to M. Damian enclosing recorded certified copy of Agreed Order Voiding 2021 Amendment and requesting instructions to mail original.	0.10	\$50.00
02/17/2023	JJ	Attend to posting of recorded certified copy of Agreed Order Voiding 2021 Amendment on the Hammocks website.	0.30	\$150.00
02/17/2023	JJ	Received and reviewed FSR startup checklist to prepare payment coupons for residential apartment building owners.	0.10	\$50.00
02/17/2023	JJ	Electronic mail correspondence to Judge Gersten (Ret.) and M. Damian enclosing startup checklist to prepare payment coupons for residential apartment building owners for review and approval.	0.10	\$50.00
02/17/2023	JJ	Prepared startup checklist for review by Judge Gersten (Ret.) and M. Damian to approve payment coupons for residential apartment building owners.	0.20	\$100.00
02/17/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (Ret.) regarding candidate qualifications such as	0.50	\$250.00

amounts outstanding and ownership at the Hammocks.				
02/17/2023	JJ	Attend to numerous communications with Advisory Committee members on the Chatline regarding the connection between Heron on the Hammocks and M. Gallego, information on Cetraro, and to secure a plat map of Hammocks.	1.80	\$900.00
02/18/2023	JJ	Attend to communications with candidates, Receiver Judge Gersten (ret.), and M. Damian regarding interviews and submissions.	1.50	\$750.00
02/18/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (Ret.) and M. Damian enclosing Receivership Meeting # 16 Notes and Executive Summary for approval and distribution to Advisory Committee.	0.20	\$100.00
02/19/2023	JJ	Prepared for Candidate Interview including communications with Receiver Judge Gersten (ret.), and counsel, communications with candidates, and practice Zoom sessions to ensure all configurations are working properly.	0.80	\$400.00
02/19/2023	JJ	Attend to candidate interviews, communications, and troubleshooting to ensure smooth interview process for Receiver, M. Damian, and candidates. (HALF RATE).	5.00	\$1,250.00
02/20/2023	JJ	Attend to multiple communications with Oscar Velez, candidate for the board of directors, to provide details on interview with Receiver Judge Gersten (Ret.) and arrange for English - Spanish translations.	0.50	\$250.00
02/20/2023	JJ	Attend to numerous attempts to contact Maria Masongsong.	0.60	\$300.00
02/21/2023	JJ	Attend to candidate interviews, communications, and troubleshooting to ensure smooth interview process for Receiver, M. Damian, and candidates. (HALF RATE).	2.50	\$1,250.00
02/21/2023	JJ	Numerous attempts to contact M. Masongsong including discovery of additional contact information from property manager, A. Weiner, and established communication through husband's cell phone number.	0.40	\$200.00

02/21/2023	JJ	Electronic mail correspondence to candidate Joseph Perez reminding him to sign his Consent to a Background check.	0.10	\$50.00
02/21/2023	JJ	Attend to review and approval for publishing of updates to the Hammocks website.	0.50	\$250.00
02/21/2023	JJ	Compiled and reviewed Consents to a Background Check from 12 out of the 13 candidates for seat on the board of directors of the Hammocks.	0.80	\$400.00
02/21/2023	JJ	Electronic mail correspondence to A. Weiner and M. Damian enclosing copies of the 12 consents to a background check received from the candidates for the board of directors of the Hammocks--missing consent from Joseph Perez.	0.20	\$100.00
02/21/2023	JJ	Prepared first draft of Second Notice of Annual Meeting and Election.	2.60	\$1,300.00
02/22/2023	JJ	Telephone conference with A. Weiner, property manager, regarding need for additional information to complete candidate background checks.	0.30	\$150.00
02/22/2023	JJ	Attend to securing all consents to background check from candidates and compiling of social security numbers, dates of birth, and copies of driver's licenses for each candidate to be securely submitted to Verify Screening Solutions Inc.	3.30	\$1,650.00
02/22/2023	JJ	Telephone conference with D. Kearns regarding special request for handling of confidential information and instruction for certain information not to be posted on the Hammocks website.	0.10	\$50.00
02/22/2023	JJ	Telephone conference with A. Weiner to determine best method of providing confidential information to professional screening company to ensure it is securely transmitted without interception.	0.10	\$50.00
02/22/2023	JJ	Telephone conference with A. Theale to coordinate mailing of Second Notice of Annual Meeting and Election.	0.10	\$55.00
02/22/2023	JJ	Exchanged communications with Receiver Judge Gersten (Ret.) and M. Damian regarding	0.30	\$150.00

		candidate Maria Masongsong who made contact for an interview.		
02/22/2023	JJ	Electronic mail correspondence with M. Damian and A. Weiner regarding collection of candidate data including driver's licenses.	0.30	\$165.00
02/22/2023	JJ	Telephone conference with A. Weiner regarding need for updated owner ledgers to ensure owners' eligibility to vote.	0.10	\$50.00
02/22/2023	JJ	Telephone conference with assistant for candidate Joseph Perez concerning requirements for service on the board of directors of the Hammocks after indicating he was reconsidering his intent for candidacy.	0.20	\$100.00
02/22/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (Ret.) and M. Damian regarding communication from J. Perez regarding his reconsideration of serving on the board of directors.	0.10	\$50.00
02/22/2023	JJ	Finalized first draft of Second Notice of Annual Meeting and Election.	1.50	\$750.00
02/22/2023	JJ	Communication with S. Katz regarding review and comments on first draft of Second Notice of Annual Meeting and Election for submission as final draft to Receiver.	0.10	\$50.00
02/22/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (Ret.) regarding revisions to Second Notice of Annual Meeting and Election.	0.10	\$50.00
02/22/2023	JJ	Reviewed and revised Second Notice of Annual Meeting and Election based on edits from Receiver Judge Gersten (Ret.).	0.20	\$100.00
02/23/2023	JJ	Prepared and finalized Spanish translation of Second Notice of Annual Meeting and Election for the benefit of the owners.	1.20	\$600.00
02/23/2023	JJ	Telephone conference with M. Damian regarding review and revisions to the Second Notice of Annual Meeting and Election to be delivered to owners as required by the Court's order on Hammocks Election Procedures.	0.10	\$50.00

02/23/2023	JJ	Telephone conference with S. Katz reviewing and analyzing the Second Notice of Annual Meeting and Election to be delivered to owners as required by the Court's order on Hammocks Election Procedures to ensure compliance with Florida Statutes governing HOAs and the Hammocks governing documents.	0.20	\$100.00
02/23/2023	JJ	Exchanged communications with A. Weiner, property manager for Hammocks, regarding final version of the Second Notice of Annual Meeting and Election to be delivered to owners.	0.10	\$50.00
02/23/2023	JJ	Communication to Hammocks Advisory Committee chatline enclosing copy of Receiver's Supplemental Report.	0.10	\$50.00
02/23/2023	JJ	Exchanged communications with Joseph Perez regarding his decision to stay on as a candidate for the board of directors of the Hammocks.	0.20	\$100.00
02/23/2023	JJ	Initial review of background checks to ensure no reported convictions for any candidates that would disqualify them from serving on the Hammocks board of directors.	0.60	\$300.00
02/23/2023	JJ	Exchanged communications with Receiver Judge Gersten (Ret.) and M. Damian regarding outcome of initial review and analysis of background checks on the candidates for the board of directors of the Hammocks.	0.20	\$100.00
02/23/2023	JJ	Exchanged electronic mail correspondence with principal of the screening company Humberto Azor of Verify Screening Solutions, Inc., who confirmed "No convictions at all" as to the candidates being considered for the board of directors of the Hammocks.	0.10	\$50.00
02/23/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (Ret.) and M. Damian confirming no criminal convictions as to the candidates running for the board of directors of the Hammocks and attaching and requesting approval to submit the Second Notice of Annual Meeting and Election in final form including a Spanish translation to the property manager for publication and delivery to the owners.	0.20	\$100.00

02/23/2023	JJ	Exchanged communications with property manager A. Weiner and vice-president of FSR Alyson Theale regarding update on finalization of Second Notice of Annual Meeting and Election.	0.10	\$50.00
02/23/2023	JJ	Reviewed and analyzed Hammocks website to determine accuracy of information and to post new information for the owners regarding the upcoming election.	0.40	\$200.00
02/23/2023	JJ	Numerous communications to the Hammocks website development team requesting revisions to the Hammocks website information and providing new information to be published to the owners.	0.30	\$150.00
02/23/2023	JJ	Attend to confirmation and scheduling of interview of Maria Masongsong with Receiver Judge Gersten (Ret.) and M. Damian regarding her candidacy for the board of directors of the Hammocks.	0.20	\$100.00
02/23/2023	JJ	Prepared first draft of invitation to owners to the moderated Hammocks Town Hall Meeting III and sought approval to post from Receiver Judge Gersten (Ret.).	0.40	\$200.00
02/23/2023	JJ	Exchanged electronic mail correspondence with M. Masongsong regarding her upcoming interview.	0.10	\$50.00
02/23/2023	JJ	Exchanged electronic mail correspondence with M. Damain regarding late submission of candidate application by Class E member for Class E fixed director seat.	0.10	\$50.00
02/23/2023	JJ	Exchanged electronic mail correspondence with A. Weiner, A. Theale, and J. Ferreiro enclosing final version of Second Notice of Annual Meeting and Election for posting and distribution to the owners.	0.20	\$100.00
02/23/2023	JJ	Exchanged electronic mail correspondence with Janine Ferreiro of First Service Residential regarding need to include ballot and envelope in the Second Notice mailing.	0.10	\$50.00
02/23/2023	JJ	Attend to multiple communications with First Service Residential website team making numerous posting to the Hammocks website	1.00	\$500.00

		notifying owners of the election process and materials.		
02/23/2023	JJ	Reviewed and analyzed Receiver's Supplemental Report for the Period January 5, 2023 through February 22, 2023.	0.60	\$300.00
02/23/2023	JJ	Communications with Advisory Committee regarding Receiver's Supplemental Report for the Period of January 5, 2023 through February 22, 2023.	0.50	\$250.00
02/23/2023	JJ	Numerous communications with Advisory Committee regarding concerns of improving election procedures for additional oversight.	0.50	\$250.00
02/23/2023	JJ	Attend to ensuring interview of Maria Masongsong took place with Receiver Judge Gersten (Ret.) and M. Damian.	0.20	\$100.00
02/23/2023	JJ	Received and reviewed communication from Receiver's team that candidate Marisol Marin requested to change her candidacy from the fixed director seat to the general director seat.	0.10	\$50.00
02/23/2023	JJ	Telephone conference with Marisol Marin regarding her request to change her candidacy from the general director seat to the fixed director seat.	0.10	\$50.00
02/23/2023	JJ	Exchanged communications with A. Theale, A. Weiner, and J. Ferreiro regarding Marisol Marin's request to change her candidacy from fixed director seat to general director seat and need to contact printing company to change Second Notice of Annual Meeting and Election with revised notice.	0.30	\$150.00
02/23/2023	JJ	Revised English and Spanish versions of the Second Notice of Annual Meeting and Election to reflect Marisol Marin's decision to change her candidacy from the fixed director seat to the general director seat.	0.40	\$200.00
02/23/2023	JJ	Electronic mail correspondence to A. Theale, J. Ferreiro, and A. Weiner enclosing revised and approved Second Notice of Annual Meeting and Election moving Marisol Marin's candidacy from a fixed director seat to a general director seat.	0.20	\$100.00

02/23/2023	JJ	Received and reviewed request from Receiver's team to contact Class E fixed director seat candidate to obtain a signed consent form to a background check.	0.10	\$50.00
02/23/2023	JJ	Electronic mail correspondence to Juan Franco requesting his consent to a background check.	0.10	\$50.00
02/23/2023	JJ	Received and reviewed candidate application from Juan Franco for the Class E fixed director seat.	0.20	\$100.00
02/24/2023	JJ	Attend to numerous communications with the Advisory Committee regarding coordination of schedules for a Hammocks Receivership Meeting with Receiver Judge Gersten (ret.).	1.50	\$750.00
02/24/2023	JJ	Attend to numerous communications with Advisory Committee regarding proposed campaign rules, details of election notices, and concerns with election process.	2.00	\$1,000.00
02/25/2023	JJ	Reviewed and analyzed all information posted on website to ensure accuracy and to create special elections tab and information.	1.00	\$500.00
02/25/2023	JJ	Prepared comprehensive electronic mail correspondence to M. Vazquez and A. Theale regarding revisions and updates to the Hammocks website.	0.80	\$400.00
02/25/2023	JJ	Prepared for the First Meet and Greet of Candidates to be conducted in person with no zoom access as a social event with light refreshments; exchanged correspondence with Receiver Judge Gersten (Ret.) and M. Damian confirming same.	0.60	\$300.00
02/25/2023	JJ	Prepared comprehensive electronic mail correspondence to A. Theale explaining and detailing election events and requesting election services necessary to host meet and greet events for the candidates at the Clubhouse, a moderated Town Hall III for the owners, and early voting days and election days.	1.00	\$500.00
02/26/2023	JJ	Telephone conference with Judge Gersten (Ret.) regarding outcome of candidate interviews, election procedures, and details for upcoming	0.90	\$450.00

		meet and greet.		
02/26/2023	JJ	Telephone conference with Judge Gersten (Ret.) regarding details about process for casting ballots and protecting against potential irregularities.	0.30	\$150.00
02/26/2023	JJ	Attend to coordinating advisory committee meeting with Judge Gersten (Ret.) and M. Damian, and Advisory Committee member I. Ardisson, P. Cabrera, A. Danton, D. Kearns, M. Real, and J. Staton.	1.00	\$500.00
02/27/2023	JJ	Telephone conference with E. Thompson regarding Receiver Judge Gersten (Ret.)'s request to prepare a PowerPoint presentation for the State of the Union III.	0.10	\$50.00
02/27/2023	JJ	Telephone conference with Receiver Judge Gersten (Ret.) regarding PowerPoint for State of the Union III and upcoming advisory committee meeting.	0.10	\$50.00
02/27/2023	JJ	Attended Hammocks Receivership Advisory Committee Meeting # 18 with Receiver Judge Gersten (Ret.), M. Damian, E. Thompson, I. Ardisson, P. Cabrera, A. Danton, D. Kearns, M. Real, and J. Staton to address concerns with election process, lack of maintenance on the lakes, and other community updates.	1.50	\$750.00
02/27/2023	JJ	Telephone conference with M. Kaufman regarding outcome of Hammocks Receivership Advisory Committee Meeting # 18 and future involvement in all election meetings and processes.	0.40	\$200.00
02/27/2023	JJ	Attended Zoom video conference with Receiver Judge Gersten and M. Damian regarding outcome of Hammocks Receivership Advisory Committee Meeting # 18 and decision on candidate information to be posted on the Hammocks website.	1.00	\$500.00
02/27/2023	JJ	Telephone conference with M. Real regarding outcome of Hammocks Receivership Advisory Committee Meeting # 18 and details of election process.	1.00	\$500.00
02/27/2023	JJ	Telephone conference with I. Ardisson and D. Kearns regarding outcome of Hammocks	1.30	\$650.00

Receivership Advisory Committee Meeting # 18 and for additional information concerning sale of property by M. Ghilardi.				
02/27/2023	JJ	Reviewed and analyzed Second Interim Report to extract all important information and prepare a PowerPoint Presentation for the benefit of Judge Butchko and the owners providing a State of the Union III.	2.70	\$1,350.00
02/28/2023	JJ	Finalized PowerPoint Presentation of the State of the Union III for the benefit of Judge Butchko and the owners at the status conference.	2.00	\$1,000.00
02/28/2023	JJ	Telephone and Zoom video conference with E. Thompson and Receiver Judge Gersten (Ret.) preparing for status conference before Judge Butchko and the owners to provide State of the Union III.	1.50	\$750.00
02/28/2023	JJ	Attended status conference before Judge Butchko for State of the Union III.	1.00	\$500.00
02/28/2023	JJ	Telephone conference with Receiver Judge Gersten (Ret.) and E. Thompson to discuss outcome of State of the Union III, campaigning rules, election schedule, and updates to the Hammocks website.	0.50	\$250.00
02/28/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from M. Vazquez enclosing detailed account of changes to the website for review and approval before publishing.	0.50	\$250.00
02/28/2023	JJ	Attend to numerous changes to the Hammocks Website to update new election schedule, procedures, candidate information, and State of the Union III materials.	2.00	\$1,000.00
02/28/2023	JJ	Travel to and attendance at in person First Meet and Greet of Candidates.	3.70	\$1,850.00
03/03/2023	JJ	Received and reviewed electronic mail correspondence from Advisory Committee member I. Ardisson noting a vehicle is reportedly stranded at a gas station.	0.20	\$100.00
03/03/2023	JJ	Received and reviewed electronic mail correspondence from M. Damian indicating a	0.10	\$50.00

		Hammocks vehicle is being stored at gas station pending resolution of an artisan's lien.		
03/03/2023	JJ	Received and reviewed electronic mail correspondence from M. Damian responding to I. Ardisson and confirming the Receiver is aware of the Hammocks vehicle.	0.10	\$50.00
03/03/2023	JJ	Received and reviewed Notice of Deposition of Records Custodian of Alfaro & Fernandez.	0.10	\$50.00
03/03/2023	JJ	Update communication to Advisory Committee concerning Notice of Deposition of Records Custodian of Alfaro & Fernandez.	0.10	\$50.00
03/05/2023	JJ	Prepared Hammocks Receivership Advisory Committee Meeting # 18 Notes.	0.70	\$350.00
03/05/2023	JJ	Prepared Executive Summary of Hammocks Advisory Committee Meeting # 18 for review and approval by Receiver Judge Gersten (Ret.).	1.30	\$650.00
03/05/2023	JJ	Prepared comprehensive electronic mail correspondence to Receiver Judge Gersten (Ret.), M. Damian, and E. Thompson outlining action items taken away from the Hammocks Receivership Advisory Committee Meeting # 18 and enclosing Notes and Executive Summary.	0.70	\$350.00
03/05/2023	JJ	Attend to numerous communications with Hammocks Advisory Committee regarding scheduling of next Advisory Committee meeting, requesting ideas for campaign rules, and publishing the Executive Summary for the Hammocks Receivership Advisory Committee Meeting # 16.	1.50	\$750.00
03/05/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (Ret.) and M. Damian regarding revisions to Executive Summary of Advisory Committee Meeting # 16.	0.20	\$100.00
03/05/2023	JJ	Revised Executive Summary of Hammocks Receivership Advisory Committee Meeting # 16.	0.20	\$100.00
03/05/2023	JJ	Revised Executive Summary of Hammocks Receivership Advisory Committee Meeting # 18 as instructed by Receiver Judge Gersten (Ret.).	0.20	\$100.00

03/05/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (Ret.) and M. Damian regarding revisions to Executive Summary of Hammocks Receivership Advisory Committee Meeting # 18.	0.10	\$50.00
03/06/2023	JJ	Telephone conference with E. Thompson regarding opinions on Hammocks Campaign Rules and their enforcement to advise Receiver Judge Gersten (Ret.) accordingly.	0.60	\$300.00
03/06/2023	JJ	Performed legal research of campaign rules and reviewed forms from the ABA and other similar elections of board of directors to prepare Hammocks Campaign Rules.	1.20	\$600.00
03/06/2023	JJ	Prepared first draft of Hammocks Campaign Rules and shared same via electronic mail correspondence to Receiver Judge Gersten (Ret.), M. Damian, and E. Thompson.	1.50	\$750.00
03/06/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (Ret.) approving Executive Summary of Hammocks Receivership Advisory Committee Meeting # 18 for posting to the Advisory Committee.	0.10	\$50.00
03/06/2023	JJ	Communication to Advisory Committee enclosing Executive Summary of Hammocks Receivership Advisory Committee Meeting # 18 for posting to the Advisory Committee.	0.10	\$50.00
03/06/2023	JJ	Attend to coordination of Hammocks Receivership Advisory Committee Meeting # 19 with Advisory Committee members, Receiver Judge Gersten (Ret.), E. Thompson, M. Kaufman, and M. Damian.	1.00	\$500.00
03/06/2023	JJ	Exchanged electronic mail correspondence with property management team regarding meeting for details of Annual Meeting and Election.	0.20	\$100.00
03/07/2023	JJ	Attended Zoom video conference meeting with the property management team at First Service Residential, including Alyson Theale, Melissa Vazquez, Janine Ferreiro, and Andrew Weiner, to prepare for upcoming election, formulate election protocols, including staffing and Clubhouse layout,	1.40	\$700.00

		attend to protocol for absentee ballots and rosters, and management of other upcoming election events.		
03/07/2023	JJ	Reviewed and prepared proposed election protocols and guidelines in preparation for meeting with First Service Residential on election protocols, Clubhouse layout, and options for secure ballot boxes.	0.60	\$300.00
03/07/2023	JJ	Prepared electronic mail correspondence Judge Gersten (Ret.) and M. Damian regarding outcome of meeting with FSR on election protocols.	0.30	\$150.00
03/07/2023	JJ	Reviewed and analyzed election layout proposed by FSR and prepared video notes for review and approval by Receiver Judge Gersten and M. Damian.	0.40	\$200.00
03/09/2023	JJ	Reviewed and analyzed lawsuit filed by SW 104TH FL Partners LLC in preparation for telephone conference with Michael S. Provenzale and R. Stone.	0.40	\$200.00
03/09/2023	JJ	Telephone conference with Michael S. Provenzale and R. Stone regarding SW 104TH FL Partners LLC's position concerning a fixed director seat for Class E members of the Hammocks.	0.30	\$150.00
03/09/2023	JJ	Telephone conference with M. Kaufman regarding SW 104TH FL Partners LLC director seat.	0.30	\$150.00
03/09/2023	JJ	Telephone conference with E. Thompson and Krys Godwin regarding strategy to pursue potential clawback claims by the Hammocks against former wrongfully paid payees of Hammocks funds.	1.00	\$500.00
03/09/2023	JJ	Reviewed and analyzed report prepared by K. Godwin regarding all connections thus far determined among former employees of the Hammocks and the former board of directors.	0.80	\$400.00
03/10/2023	JJ	Prepared first draft of Hammocks Official Election Ballot.	1.80	\$900.00
03/10/2023	JJ	Prepared official ballot package with control numbers and security measures.	1.60	\$800.00

03/10/2023	JJ	Exchanged electronic mail correspondence with FSR team regarding form of Hammocks Official Ballots.	0.40	\$200.00
03/12/2023	JJ	Prepared for Hammocks Receivership Legal Team Meeting regarding election procedures.	0.80	\$400.00
03/12/2023	JJ	Attended Hammocks Receivership Legal Team Meeting on Election Procedures with Receiver Judge Gersten (ret.), M. Damian, and E. Thompson.	3.30	\$1,650.00
03/12/2023	JJ	Revised, finalized, and proofread Campaign Rules to submit final version to receivership team for review and approval for publication.	0.50	\$250.00
03/12/2023	JJ	Prepared and edited aerial, satellite image of the Hammocks Clubhouse to outline the perimeter of the no campaigning zone of the Hammocks Clubhouse.	0.60	\$300.00
03/12/2023	JJ	Prepared electronic mail correspondence to Receiver Judge Gersten (ret.), M. Damian, and E. Thompson requesting final review and approval of the Hammocks Campaign Rules for publication.	0.20	\$100.00
03/12/2023	JJ	Communication to receivership team enclosing proposed map of no campaigning perimeter at the Hammocks Clubhouse for review and approval to include with the Campaign Rules.	0.10	\$50.00
03/13/2023	JJ	Prepared first draft of Receiver's Motion to Approve Campaign Rules.	0.50	\$250.00
03/13/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.), M. Damian, and E. Thompson regarding seeking court approval of Campaign Rules.	0.40	\$200.00
03/13/2023	JJ	Revised and finalized proposed Agreed Order Granting Receiver's Motion to Approve Campaign Rules.	0.20	\$100.00
03/14/2023	JJ	Telephone conference with Advisory Committee member Marcoantonio Real regarding candidate eligibility requirements and election procedures.	0.50	\$250.00
03/14/2023	JJ	Received and reviewed court approved campaign rules and agreed order approving Receiver's	0.20	\$100.00

		motion to approve the Campaign Rules.		
03/14/2023	JJ	Communication to Hammocks Advisory Committee a copy of the motion and agreed order granting same.	0.20	\$100.00
03/14/2023	JJ	Electronic mail correspondence to website team at FSR requesting the publication of the court approved campaign rules.	0.10	\$50.00
03/14/2023	JJ	Prepared proposed email to candidates enclosing a copy of the court approved Campaign Rules that will govern campaigning going forward and requested approval from Receiver Judge Gersten (ret.) and M. Damian to convey same to candidates.	0.20	\$100.00
			Services Subtotal	\$47,070.00

Expenses

Date	Notes	Quantity	Rate	Total
02/07/2023	Payment to clerk of court for certified copy of Agreed Order Invalidating Amendment to the Declaration.	1.00	\$33.00	\$33.00
02/21/2023	Payment for monthly subscription to Consent Kit, which was used to secure the consents to a background check of the candidates of the board of directors of the Hammocks.	1.00	\$30.15	\$30.15
03/07/2023	Expert Fees: Kozyak Tropin & Throckmorton LLP Trust Account - Fee Expert	1.00	\$2,500.00	\$2,500.00
			Expenses Subtotal	\$2,563.15
			Subtotal	\$49,633.15
			Total	\$49,633.15

Please make all amounts payable to: The Morgan Law Group, P.A.

Please pay within 30 days.

Law Offices
Michael S. Kaufman
 Prudential - Bache Building
 11900 Biscayne Blvd.
 Suite 511
 Miami, FL 33181

Dade (305) 895-5588

MSKLAW@ATT.NET

Fax (305) 893-8413

FACSIMILE TRANSMITTAL COVER SHEET

TO: Honorable David Gersten (Ret.)
Melanie Damian, Esq.

Fax
~~TEL~~ NO. 1-877-634-7245

FROM: MSK

FAX NO. 305-371-3965

NO. OF PAGES: 5
 (including this sheet)

DATE: March 20, 2023

FILE NO. Hammocks

TIME: 10:20 p.m.

Comments: _____

Please see enclosed billings for 2/16/23 - 3/15/23

 If you do not receive all of these pages, please call (305) 893-8562 or
 our facsimile number is (305) 893-8413.

Thank You.

MICHAEL S. KAUFMAN, ESQ. BILLINGS FOR HAMMOCKS 2/16/23-3/15/23

02/16/2023	Telephone conference with J. Jarron as he was instructed by Receiver Judge Gersten (Ret.) concerning next steps for candidate eligibility and communications with advisory committee.	0.80 ✓
2/16/23-	Contact Joel Aresty, Esq. and Paul Meadows, Esq. regarding AC member (AD) qualifications for Hammocks candidacy, obtain and review opinion letter, communicate and distribute to Receiver team	2.40
2/17	- Received call from Ana Martinez (arrested past board president) who requested help to obtain a receiver for Heron sub-association in the Hammocks to replace its current Board which includes AC member (MAR)	.70
2/17	- AC chat line discussion regarding Heron situation from afternoon into evening- composite time	2.50
2/17	- Discussed Heron situation privately with AC member (IA)	.30
2/17	- Discussed Heron situation privately with AC member (MAR)	.50
2/20	- Discussion with AC member (MAR) regarding upcoming candidate interview with Receiver team	.40 ✓
2/21	- Phone call from Gallego daughter-in-law regarding a subpoena she received from State Attorney	.10 ✓
2/22	- Spoke with AC member (AD) regarding her status as a candidate due to bankruptcy	.90 ✓
2/22	- Attend neighborhood zoom meeting with AC member (AD) regarding new proposed statute governing HOA	1.00 ✓
2/22	- Appear on WFE La Poderosa 670 AM radio show hosted by Maria Laria with State Representative Julio Robaina to discuss proposed changes to HOA laws.	1.00
2/23	- Review Receiver's Supplemental Report	.90 ✓
2/23	- Spoke with candidate Marisol Marin regarding her ability to switch from fixed seat to open seat	.70
2/23	- AC chat line discussion regarding election procedures from 5:13 p.m. to 12:32 a.m.- actual time	7.30 ADUETO 1.0 HR ✓
2/24	- Follow up with Marisol Marin regarding her switching seats	.20
2/24	- Discussion with AC member (MAR) as to status of election procedures	.60 ✓
2/24	- AC chat line regarding election procedures- 4:51 p.m. to 9:14 p.m.- actual time	4.30 ADUETO 1.0 HR ✓
2/26	- Discussion with candidate Marisol Marin regarding forming her community into a formal sub-association	.80
02/26	Attend to coordinating advisory committee meeting with Judge Gersten (Ret.) and M. Damian, and Advisory Committee member I. Ardisson, P. Cabrera, A. Danton, D. Kearns, M. Real, and J. Staton.	1.00

02/27	Attended Hammocks Receivership Advisory Committee Meeting # 18 with Receiver Judge Gersten (Ret.), M. Damian, E. Thompson, I. Ardisson, P. Cabrera, A. Danton, D. Kearns, M. Real, and J. Staton to address concerns with election process, lack of maintenance on the lakes, and other community updates.	1.50 ✓
02/27	Telephone conference with J. Jarron regarding outcome of Hammocks Receivership Advisory Committee Meeting # 18 and future involvement in all election meetings and processes.	0.40 ✓
2/27	Research and distribute to Receiver team law regarding Florida Homestead protection for criminal acts	0.30 ✓
02/28	Attended status conference before Judge Butchko for State of the Union III.	1.00 ✓
2/28	Receive and distribute Don Kearns affidavit	0.10 ✓
02/28	Travel to and attendance at in person First Meet and Greet of Candidates.	3.70 ✓
3/2	Review Order granting Receiver's Second Application	0.10 ✓
3/2	AC chat line discussion regarding rehiring of former pool employee and candidates qualifications-composite time	2.00 REDUCE TO 1.0 HR ✓
3/3	Review Motion Directing One.Com to turn over email address	0.10 ✓
03/05	Attend to numerous communications with Hammocks Advisory Committee regarding scheduling of next Advisory Committee meeting, requesting ideas for campaign rules, and publishing the Executive Summary for the Hammocks Receivership Advisory Committee Meeting # 16.	1.50 ✓
03/06	Attend to coordination of Hammocks Receivership Advisory Committee Meeting # 19 with Advisory Committee members, Receiver Judge Gersten (Ret.), E. Thompson, J. Jarron and M. Damian.	1.00 ✓
3/6	Received and reviewed detailed complaint from resident Gail Sharpe questioning AC member (AD) qualifications for candidacy and responded	0.40 ✓
3/7	Communication with Eric Thompson regarding Ana Danton Affidavit as pertained to the Ceperos	0.10 ✓
3/7	Discussion with Ana Danton regarding her history with Ceperos	0.70 ✓
3/8	Communication with Receiver team regarding Danton/Cepero	0.10 ✓

03/09	Telephone conference with M. Kaufman regarding SW 104TH FL Partners LLC director seat.	0.30
3/9	Reviewed Order directing One.Com to turn over email accounts	0.10 ✓
3/9	Reviewed Hilton Napoleon, Esq. Notice of Compliance	0.10 ✓
3/12	Review email from resident regarding dissemination of proposed post on social media regarding candidates	0.10 ✓
3/13	Review of Campaign Rules and Agreed Order Approving	0.40 ✓
3/15	Review Hilton Napoleon, Esq. Second Notice of Compliance with Production of Documents	0.10 ✓
3/15	Discussion with AC member (AD) regarding Napoleon	0.30 ✓
3/15	Discussion with AC member (MAR) regarding Napoleon	0.50 ✓

Hours : 41.70

Expenses:

Total Amount: \$ 20,850.00

(41.70 x \$500.00)

2/18

Payment due Joel Aresty, Esq. for opinion letter regarding AC member (AD) qualifications : \$ ~~500.00~~

Total Due : \$ 21,350.00

**MICHAEL S KAUFMAN ATTORNEY AT LAW P A
LAW OFFICE OPERATING ACCOUNT**

11900 BISCAYNE BLVD STE 611
NORTH MIAMI FL 33181-2749
PH: (305) 893-8662

12807

63-4/630 FL
10009

DATE 12/18/23

PAY
TO THE
ORDER OF

Joel Arety, Esq.

\$ 500.00

Five hundred

DOLLARS



BANK OF AMERICA

ACH R/T 063100277

FOR

Contract Labor

M. Kauf

⑈012807⑈ ⑆063000047⑆ 229026184914⑈

Damian | Valori | Culmo

1000 Brickell Ave
Ste 1020
Miami, FL 33131-3014
Ph. (305) 371-3960
Fax. 305-371-3965
mdhanji@dvlip.com

To:

Ana Danton v. Hammocks Community Association Inc. Case 2022-007798-CA-01

Invoice

Invoice Date: 3/15/2023
Invoice No: 22924
Due Date: Due Upon Receipt

Matter: MME1642

Memo: MME1642 Ana Danton v. Hammocks Community Association Inc. Case 2022-007798-CA-01, Ana Danton v. Hammocks Community Association Inc. Case 2022-007798-CA-01

Professional Fees

Date	Description	Staff	Rate	Hours	Amount
02/15/2023	[No charge] Organize and create eBinder for board election forms.	rs		0.30	\$0.00
02/16/2023	Multiple correspondence with One.com legal regarding turnover of email accounts.	CP	\$275.00	0.30	\$82.50
02/16/2023	Work on the third party claims and analyze the emails from the claim adjuster.	ng	\$150.00	0.50	\$75.00
02/16/2023	Correspondence with P. Arcia regarding remaining documents to be transferred.	CP	\$275.00	0.20	\$55.00
02/16/2023	Prepare draft letter to tenants regarding return of uncashed checks for Association with instructions to re-issue the checks and send to DVC office, for attorney K. Murena's review.	js	\$100.00	0.20	\$20.00
02/16/2023	Review and analyze email from Court regarding rejected order on motion to withdraw for H. Napoleon and draft email to H. Napoleon regarding same, and hearing on motion for order to show cause (0.2); email exchange with Eric Thompson regarding various matters for report (0.2); call with Tamarac landlord regarding completion of lease term and payments (0.2); attend ACC meeting regarding several application (1.0); email exchange with H. Napoleon regarding withdraw and motion for order to show cause (0.1).	RML	\$525.00	1.70	\$892.50
02/16/2023	Telephone call with Receiver regarding candidate submission and voluntary documents and back ground checks (.5); reviewing forms and qualification issues (.2); reviewing and approving invoices on AVID (.2); reviewing Turf Management submission regarding beach areas (.3); updates regarding candidacy binder (.3).	MME	\$550.00	1.50	\$825.00

02/16/2023	<p>Further emails with insurance carrier regarding adjuster assigned to one of the claim asserted against the Association and its general liability policy, follow up on status of gathering requested information regarding the claim, and receive update regarding same (.2); emails and telephone call with insurance broker regarding the status of all insurance policies, confirming that there are no outstanding issues to resolve or conditions to satisfy, status of claims against certain policies, renewal dates, tail policy issues, and other matters (.4); continue working on gathering and confirming various information and providing it to E. Thompson for purposes of preparation of Receiver's Second Status Report (1.3); telephone call with Receiver's assistant regarding same and the status of the Receiver's execution of the Proof of Loss for the Crime Policy and discuss with team members (.2); emails and telephone call with M. Dhanji regarding confirmation of payment for insurance policy of Receiver and professionals, review proof of payment, and emails with insurance broker regarding same, binding of policy, and obtaining copy of policy and declaration page (.3); emails with M. Dhanji and M. Damian regarding online access to accounting system and the fiduciary account for the Estate, telephone call with M. Dhanji regarding same, and emails to and from Receiver regarding same (.2); emails with E. Thompson regarding status of preparation of Reply in Support of Motion for Relief from Bankruptcy Court Orders and preparation of Receiver's Second Status Report and need to prepare Motion for extension of time to file Report, send email to counsel for Plaintiff and counsel for Advisory Committee regarding proposed extension, emails from counsel confirming no objection, and coordinate preparation of Motion (.3); email from E. Thompson and Receiver regarding the draft Reply and begin reviewing and revising same (.2); email from Receiver regarding opinion letter from bankruptcy counsel for homeowner regarding whether she can run for a Board seat if she is making payments under Chapter plan, review opinion letter, and strategize regarding same (.3); review requirements for submitting Proof of Loss to carrier for Crime Policy, exchange emails with R. Landy and M. Davis regarding personnel files and documents evidencing positions of subject directors/officers, and work on gathering documents (.5); email from Receiver forwarding signed and notarized Proof of Loss, review same, work on compiling same with all Exhibits, and evidence of positions of directors/officers, prepare and send email to adjuster for claim against Crime Policy forwarding same (.4); continue working on confirming balances in various bank accounts of Association for purposes of Receiver's Second Status Report (.4); confirm that loan payment was made from Popular Bank operating account to Popular Bank loan account (.1); email from First Insurance Funding forwarding monthly statement for premium payments for two insurance policies and coordinate payment of same (.1); emails with J. Serna regarding confirming addresses of various parties who sent checks to Alfaro and Fernandez so checks can be returned and reissued to Association and provide direction regarding same and preparing cover letter to include with checks (.2); email</p>	KDM	\$525.00	5.50	\$2,887.50
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from insurance broker forwarding Confirmation of Insurance for policy for Receiver and professionals, review same, and send to Receiver and E. Thompson (.1); emails with counsel for THR Property Management regarding checks that were issued to the Association, then cancelled and then re-issued and send to FSR, emails with M. Dhanji regarding same, and work on confirming receipt of replacement checks (.3).

02/17/2023	Call from Property Manager regarding pending invoices (0.2); call from George Mahfood regarding trust funds and document production (0.2); email exchange with H. Napoleon (0.1); call from I. Reyes regarding fee matters (0.2); work on financial operational matters (0.2); email exchange with R. Stone regarding pending litigation (0.1); call with Receiver regarding fee applications (0.1); draft notice of consent to withdraw of H. Napoleon in Danton case (0.1).	RML	\$525.00	1.20	\$630.00
02/17/2023	Review opinion letter from Danton's counsel and discuss with K. Murena, research arguments made therein, automatic stay, Chapter 13 plan dischargeability, Fla. Stat. on Association elections, and case law applying those laws in bankruptcy context and begin drafting legal analysis.	CPM	\$500.00	3.80	\$1,900.00
02/17/2023	[No charge] Reserve hearing date on CourtMaps; prepare, file and finalize notice of hearing; upload hearing materials.	lfd		0.20	\$0.00
02/17/2023	Reviewing and revising e-mail to candidates (.3); discuss same with Jesmany (.2); reviewing submissions from candidates and responding (.3); reviewing ledgers for qualification and bankruptcy issue and e-mails regarding same (.6); e-mails regarding legal representation of Hammocks prior to Receivership and agreed order on withdrawal (.4); reviewing and responding regarding payment issues and amended declaration (.3); wiring funds and e-mails regarding same regarding cashflow issues (.3).	MME	\$550.00	2.20	\$1,210.00

02/17/2023	Continue reviewing and revising Reply in support of Motion for relief from Bankruptcy Court Judgment and Orders and send revised draft to Receiver and E. Thompson (1.4); email from Receiver and E. Thompson approving revisions to the Reply and work on finalizing and filing same (.2); email from E. Thompson regarding the binding of the policy for Receiver and professionals (.1); review Notice of Consent to withdrawal of former counsel for Association and Notice of Hearing on Motion for Order to show cause as to former counsel and discuss with team members (.1); emails and discuss with M. Damian amounts in various accounts of Association, moving funds to fiduciary account at CNB, having cashier's check issued from TD Bank for account balance and related matters, login to Truist account to transfer funds to fiduciary account, emails with Truist representative regarding authorizing transfer, telephone call with TD Bank regarding issuing of cashier's check, emails with TD Bank representative regarding same, and discuss with M. Dhanji and M. Damian (0.6); discuss with M. Damian researching issue of whether homeowner making payments under Chapter 13 plan can run for board seat under applicable state and bankruptcy law and Association's Declaration, discuss research issue with C. Perez and forward opinion letter from bankruptcy counsel for homeowner, provide direction to C. Perez regarding same (.4); work with C. Perez on analyzing the issue and preliminary findings from research and provide further input regarding same (.7); review and revise Motion for Extension of Time to File Receiver's Second Status Report, exchange emails with E. Thompson regarding same, and coordinate finalizing and filing (.3); emails with counsel for Advisory Committee, the Receiver and M. Damian regarding recording of certified copy of Order voiding amendment to declaration and review same (.1); multiple emails with forensic accountant, Receiver, and M. Damian regarding updated analysis of transfers from Association to various law firms and status of our investigation of same, and review updated analysis (.3).	KDM	\$525.00	4.20	\$2,205.00
02/18/2023	Research pre and post bankruptcy debts to association and continue drafting legal analysis on requirements for board members under Fla. Stat. and discuss with K. Murena and M. Damian and prepare explanatory email regarding same.	CPM	\$500.00	1.30	\$650.00
02/18/2023	Review and analyze emails from P. Arcia regarding representation and document production (0.2); email exchange regarding potential witnesses for association claims (0.1).	RML	\$525.00	0.30	\$157.50

02/18/2023	Further discuss with C. Perez her findings on issue of whether homeowner making payments under Chapter 13 plan can run for board seat under applicable state and bankruptcy law and Association's Declaration, review C. Perez's memorandum of law on research issue, and further discuss with C. Perez whether homeowner at issue has been paying homeowners fees since bankruptcy filing in addition to payments under Chapter 13 plan (.8); emails with M. Damian and Receiver regarding same (.1); emails with M. Damian and R. Landy regarding witness who may provide information helpful to the Receiver's claim against Crime Policy and for other purposes and send email to counsel for Plaintiff regarding same (.2); continue working with team on confirming various amounts to be included in the Receiver's Second Status Report and prepare and send email to E. Thompson regarding same (.4).	KDM	\$525.00	1.50	\$787.50
02/19/2023	Reviewing invoice for fee app (.5-no charge); reviewing analysis regarding assessments subject to bankruptcy plan and discuss same with Receiver (.4); interviewing board candidates 5 interviews (2.5).	MME	\$550.00	2.90	\$1,595.00
02/19/2023	Emails with E. Thompson and Receiver regarding submitting the proposed Agreed Order to the Court for entry after confirming the parties' consent to the form and emails with J. Serna regarding same (.2); emails with counsel for RevoPay regarding accessing the online portal to view transactions and whether the Receiver will execute the NDA provided for same and confirm that payments from RevoPay were deposited in Truist Bank account (.2); email from E. Thompson regarding the balances in the Association's various accounts and the balances of the two loans to the Association, login to Popular Bank account and review statements from Ally Bank to confirm loan balances and payments, send emails to J. Serna and M. Dhanji regarding same and coordinate obtaining latest statements, and send email to E. Thompson providing information regarding same (.7); multiple emails with E. Thompson regarding the status of confirming ownership of vehicles, review and provide updated list of same and the status of locating one missing vehicle or filing of insurance claim (.3).	KDM	\$525.00	1.40	\$735.00
02/20/2023	[No charge] Email from/to Melanie Damian regarding proposed Order on Second Fee App; calendar submission deadlines; review Amended Order Appointing Receiver; revise proposed order; email to Melanie Damian regarding revised Order.	lfd		0.10	\$0.00
02/20/2023	Work on transfer and access to records.	RML	\$525.00	0.20	\$105.00
02/20/2023	[No charge] Work on outstanding claims, the emails from the adjuster and A. Weiner regarding information.	ng		1.20	\$0.00
02/20/2023	[No charge] Research regarding parent association bears the liability of an personal injury or if the subsidiary association does.	ng		1.20	\$0.00

02/20/2023	Further emails with RevoPay regarding accessing the account online and continued payments through the system to Association's account (.2); multiple emails with E. Thompson regarding various information to be included in the Receiver's Second Status Report and continue working with team members on confirming same and providing information to E. Thompson (.5); further emails with team members regarding balance to Ally Bank for auto loans and making monthly payments for same and provide input regarding same (.2); review and approve proposed Agreed Order granting motion for extension of time to file second status report and coordinate submitting to Court for entry (.1); emails with E. Thompson and discuss with team members the status of efforts to sell certain landscaping equipment, send email to property manager regarding same, and email from R. Landy providing update and coordinate providing information to E. Thompson for purposes of Status Report (.3); discuss with R. Landy the status of confirming that missing vehicle was located and the filing of police report for theft for purposes of insurance claim to have it repaired, provide update to E. Thompson, and email from E. Thompson regarding same, and strategize regarding filing insurance claim for damages (.3); emails with E. Thompson regarding the deadline to file Notice in Appellate Court regarding the status of Motion for relief from Bankruptcy Court Orders and certain issues to raise in the Notice and strategize regarding same (.2); email from insurance broker forwarding the latest loss runs for the General Liability and Business Auto insurance policies and review same (.2); review response to Subpoena from American Express, discuss with team members, and coordinate updating Subpoena tracking chart (.2); review and revise letter to homeowners who made checks payable to former counsel for Association for maintenance fees, requesting they reissue check to Association and send to Receiver and coordinate sending out letters with uncashed checks (.2); strategize with C. Perez regarding various provisions of the D&O policy for purposes of formulating claims against Ds & Os who breached fiduciary duties to Association and provide input regarding same (.7).	KDM	\$525.00	3.10	\$1,627.50
02/21/2023	Call with Property Manager regarding storage units (0.2); email exchange with Tamarac landlord (0.1); review and analyze email from Tryson Ward regarding equipment loan payments and draft response (0.1); review and analyze email from Rebecca Chavez regarding landscaping equipment lease and draft response (0.1); review and revise portions of report related to former counsel (0.3); review and analyze Wester Equipment Financing documents and formulate related strategy (0.3).	RML	\$525.00	1.10	\$577.50
02/21/2023	Correspondence with P. Arcia regarding billing records related to recall.	CP	\$275.00	0.20	\$55.00
02/21/2023	Assess original motion to appoint Receiver regarding Fla. Stat. 718 and 720.	CP	\$275.00	0.30	\$82.50
02/21/2023	Review DMV title requests.	ng	\$150.00	0.20	\$30.00
02/21/2023	Work on police report and email with SAO regarding stolen car.	ng	\$150.00	0.30	\$45.00

02/21/2023	Research caselaw regarding master homeowner association and subsidiary association liability.	ng	\$150.00	0.40	\$60.00
02/21/2023	Review the Hammocks declaration and articles of incorporation regarding relationship between the Hammocks and local community association.	ng	\$150.00	0.80	\$120.00
02/21/2023	Attending 7 candidate interviews.	MME	\$550.00	3.50	\$1,925.00
02/21/2023	Review and revise portions of report related to former counsel (0.3); review and analyze Wester Equipment Financing documents and formulate related strategy (0.3).	RML	\$525.00	0.60	\$315.00
02/21/2023	Emails with Ally Bank regarding current balance on the loan accounts for certain vehicles of the Association and coordinating payment through the Bank's bankruptcy department and provide direction to team members regarding same (.2); further emails with E. Thompson regarding the Reply in support of Receiver's Motion for relief from Bankruptcy Court Orders (.1); emails with Receiver and E. Thompson regarding the Notice to be filed in Appeal of Bankruptcy Court Orders (.1); email from E. Thompson forwarding draft Notice to be filed in the Appeal of the Bankruptcy Court's Orders and Judgment, review and revise same and send to E. Thompson to finalize and file, further emails with E. Thompson and Receiver regarding same, and receive confirmation of filing (.2); emails with law clerk regarding the Declaration of the Association for purposes determine certain procedures and provide input regarding same (.2); discuss with M. Damian status of investigating whether one homeowner seeking to run for Board seat is up-to-date on monthly maintenance fees to Association and confirming same with homeowner's bankruptcy counsel, review emails and document provided by homeowner regarding same, and further emails from homeowner regarding same and her bankruptcy counsel (.3); discuss with M. Damian the status of efforts to obtain quotes to purchase the vehicles and obtain titles of the vehicles from the DMV (.2); emails with R. Landy and property manager regarding financing documents for the landscaping equipment and the status of marketing equipment for sale (.1).	KDM	\$525.00	1.40	\$735.00
02/22/2023	Review and analyze email from G. Mahfood regarding trust funds, and review and analyze related documents (0.2); draft email to Receiver regarding same (0.1); calls from Property Manager regarding election (0.2); review and analyze governing document related to same (0.2); call from forensic accountant regarding homeowner deposits (0.3).	RML	\$525.00	1.00	\$525.00
02/22/2023	[No charge] Attend Disco tutorial walk through for creation of new matter.	CP		0.70	\$0.00
02/22/2023	Work with Auto Tag Agency regarding title registration from the county.	ng	\$150.00	0.60	\$90.00
02/22/2023	Research regarding filing a police report for stolen company car.	ng	\$150.00	0.40	\$60.00
02/22/2023	Research regarding Hammocks or Cortland is liable to a third party personal injury claim.	ng	\$150.00	3.30	\$495.00
02/22/2023	Work on processing ADP payroll.	md	\$100.00	0.50	\$50.00

02/22/2023	Emails regarding qualifying Board candidates, background check and additional materials submitted by candidates.	MME	\$550.00	0.50	\$275.00
02/22/2023	Review emails from Popular Bank regarding D&O conduct and review guidelines for preparing D&O policy claim and discuss with K. Murena.	CPM	\$500.00	2.20	\$1,100.00
02/22/2023	Emails with property manager and R. Landy regarding selling the landscaping equipment and party interested in purchasing it and review emails with that party regarding same (.2); review Order granting Receiver's Motion for extension of time to file 2nd Status Report and discuss with team members (.1); review Notice of Appearance of counsel for Midfirst Bank and discuss with team members involvement of that Bank (.2); telephone calls and emails with Popular Bank regarding various information and financial records that the Bank requires on a quarterly basis, send email to M. Damian and M. Davis regarding same, and discuss with team members gathering information (.4); telephone calls to and from bankruptcy counsel for homeowner seeking to run for Board seat regarding the status of her payments under her Chapter 13 plan including payments for post-petition maintenance fees and prepare and send emails to Receiver and co-counsel regarding same (.4); emails with M. Damian regarding homeowner's materials for purposes of her bid to run for Board seat and review same (.2); emails and discuss with N. Garcia the procedure for having new titles issued to the Association for the vehicles it will be selling and the power of attorney form to be signed by Receiver for purposes of same, review form, provide direction regarding filling out same, and email from N. Garcia providing update regarding revision to the form (.4); prepare and send to the Receiver and M. Damian and summary of the status of efforts to sell various vehicles of the Association and obtain new titles to the vehicles and further discuss with team members (.2); email from forensic accountant providing updated list of missing bank records and discuss with team members following up with banks to obtain same (.2); email from insurance adjuster following up on request for information related to personal injury claim, discuss with team members, and send email to N. Garcia regarding same (.2).	KDM	\$525.00	2.50	\$1,312.50
02/23/2023	[No charge] Draft subpoena and notice of taking deposition for Law offices Alfaro & Fernandez.	jf		0.10	\$0.00
02/23/2023	Work on power of attorney forms for the title registrations for the vehicles.	ng	\$150.00	1.00	\$150.00
02/23/2023	Telephone call with Unit E representative regarding status and candidate submission (.5); final candidate interview (.5); reviewing election notice and discuss same with Jesmany Jammoron (.4).	MME	\$550.00	1.40	\$770.00
02/23/2023	Draft email to Receiver regarding landscaping equipment leases and related strategy (0.1); email exchange with Receiver regarding Rasco Klock production and trust funds and draft email to G. Mahfood regarding same (0.2); confer with Property Manager regarding budget matters (0.2); work on transfer of records from Tamarac (0.1); call with E. Tamayo regarding stolen Hammocks truck (0.2).	RML	\$525.00	0.80	\$420.00

02/23/2023	<p>Emails with Receiver regarding obtaining purchase offers for the vehicles the Association will sell and follow up with N. Garcia on confirming costs to transport vehicles to CarMax, and receive update regarding same (.2); multiple emails with N. Garcia regarding same, the Power of Attorney forms necessary to obtain titles, and related matters and provide direction regarding same (.3); review purchase offers, revised Power of Attorney forms, and estimate to transport vehicles, send email to Receiver forwarding same with explanations, further emails with Receiver and N. Garcia regarding obtaining additional purchase offers and value estimations from online sources, and provide direction to N. Garcia regarding same (.4); emails with TD Bank regarding the status of sending the account balance to the Association to deposit in fiduciary account, provide Order approving M. Damian as signatory on all accounts, and discuss with M. Dhanji (.2); email from insurance adjuster for personal injury claim asserted against the Association regarding the information requested for purposes of insurance claims, emails with N. Garcia regarding same and documents requested from Property Manager to provide to adjuster, and prepare and send email providing various information to adjuster (.4); emails with M. Damian and M. Davis regarding various financial records and information requested by Popular Bank for purposes of its quarterly review of all accounts, review information and documents provided by M. Davis, work on gathering other documents and information, and prepare and send email to Bank providing certain information and documents with explanation that certain requested documents do not exist (.5); prepare and send email to FSR regarding same and requesting aged delinquency report requested by Bank (.1); discuss with M. Damian the status of receiving cashier's check from TD Bank and follow up with Bank (.1).</p>	KDM	\$525.00	2.20	\$1,155.00
02/24/2023	Correspondence with P. Arcia regarding turnover of Receivership files.	CP	\$275.00	0.20	\$55.00
02/24/2023	[No charge] Zoom call with DISCO regarding new matter creation.	CP		0.30	\$0.00
02/24/2023	Emails and telephone calls regarding notice of election issues.	MME	\$550.00	0.30	\$165.00
02/24/2023	Call with Navitas credit regarding playground equipment (0.2).	RML	\$525.00	0.20	\$105.00

02/24/2023	Emails with FSR regarding the aged delinquency report and other information requested by Popular Bank for its quarterly review and information regarding the Association's loan from Popular Bank (.2); emails with M. Damian and FSR regarding information regarding the Popular Bank loan, access loan account online and download updated information, and provide to FSR with explanation (.4); review Chapter 13 Trustee's Report of Ana Danton's Compliance with Confirmation Order and discuss with team members same (.2); emails with counsel for Plaintiff regarding a witness who may have information relevant to issues in Bankruptcy Case of the Ceperos and for purposes of insurance claims and discuss with M. Damian (.2); follow up on status of formulating claims against certain board members for breach of fiduciary duty and provide further input regarding same (.3).	KDM	\$525.00	1.30	\$682.50
02/26/2023	Emails with candidates (.3); e-mails regarding former board member selling house (.3).	MME	\$550.00	0.60	\$330.00
02/26/2023	Review and analyze emails regarding elections and emails regarding sale of properties (0.2); review and analyze and complete recommended approval or denial of several ACC applications pursuant to recommendations of ACC panel (2.0); review and analyze email exchange regarding estoppel letters (0.1).	RML	\$525.00	2.30	\$1,207.50
02/26/2023	Emails with N. Garcia regarding the status of compiling estimated values for all vehicles to be sold by Association, obtaining purchase offers from CarMax, and negotiating cost to transport vehicles to CarMax, and provide direction regarding same and prepare chart reflecting the foregoing for all vehicles (.3); emails with M. Damian regarding scheduling interview with person with information regarding matters being investigated by the Receiver (.1).	KDM	\$525.00	0.40	\$210.00
02/27/2023	Review and analyze email from Chief Tamayo regarding message from resident and draft response (0.1); review and analyze Association documents for purposes of investigating claims (0.2); email exchange with M. Ernst (0.2); work control of Association records and review and analyze moving company contract (0.2); call with Receiver and Property Manager regarding pending open items (1.1); conference with K. Murena regarding insurance documents (0.2).	RML	\$525.00	2.00	\$1,050.00
02/27/2023	Work on appraisals from Carmax, process of fleet sale.	ng	\$150.00	1.00	\$150.00
02/27/2023	[No charge] Work on appraisals from Carvana and Auto Nations.	ng		0.50	\$0.00
02/27/2023	[No charge] Work on chart with offers from Carvana, CarMax, and Autonation and liens and the documents required and include Kelly BB appraisal	ng		3.00	\$0.00
02/27/2023	Review third party claim adjusters information.	ng	\$150.00	0.30	\$45.00

02/27/2023	<p>Emails with N. Garcia regarding online offers from CarMax to purchase vehicles of the Association, obtaining online offers from Carvana, and preparing consolidated chart of all offers for all vehicles with status of inspections and delivery of vehicles and procedures for same, review draft chart, and provide input regarding revisions and additions to same (.3); emails with M. Damian regarding confirmation that invoice from IT professional was paid from Truist Bank, review Truist account activity online, and send email to M. Damian regarding same (.2); emails with R. Landy and copy service company regarding the status of scanning and uploading records and discuss with team members (.1); emails with N. Garcia regarding additional information and pictures obtained from property manager regarding one of the personal injury claims asserted against Association for purposes of providing information to insurance adjuster, follow up on status of obtaining information and documents requested by insurance adjuster for other claims, and provide direction regarding same (.3); discuss the foregoing with R. Landy, emails with M. Damian, R. Landy, and N. Garcia regarding same, and coordinate searching document management system for certain requested documents (.2); emails with N. Garcia regarding preparing responses to insurance adjusters' requests for information and documents and provide input regarding same (.2); emails and telephone call with homeowner regarding certain payments she sent to former counsel for Association, whether the funds were remitted to Association, confirming whether she has balance or credit in her account, obtaining copy of her account ledger from Association, signing up for new payment system, and emails with S. Katz regarding same and prior payments that homeowner made to his firm, review documents provided by homeowner regarding her payments, and discuss with team members (.7); review executed Power of Attorney forms for purposes of obtaining titles to vehicles of the Association and exchange emails with R. Landy and N. Garcia regarding same, and discuss timing of obtaining titles (.2); telephone call with Receiver, M. Damian and counsel for Advisory Committee regarding tracing Association funds to certain real property, status of analysis of forensic accountant, and claims to be asserted against homeowner and the property regarding same, and strategize regarding same and confirming whether there is equity in the property, and provide direction to N. Garcia regarding same and reviewing property records for mortgages (.4); emails with Plaintiff's counsel, M. Damian and R. Landy regarding witness with information regarding board members and scheduling interview of same and strategize regarding same (.2); emails with Popular Bank regarding various documents requested by the Bank for its quarterly review of loan account and follow up on status of locating additional requested records (.2); emails with N. Garcia regarding following up with various banks to obtain records needed by forensic accountant and provide direction regarding same (.2); discuss with M. Damian the upcoming Status Conference and attendance at same and the Court's consideration of the Receiver's Second Fee Application and confirm date same was filed (.2).</p>	KDM	\$525.00	3.40	\$1,785.00
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02/27/2023	Meeting of advisory committee (1.2); telephone call with Receiver and co-counsel regarding election issues and next steps (1.0).	MME	\$550.00	2.20	\$1,210.00
02/28/2023	Draft subpoena duces tecum regarding handover of attorney files (.3); add definitions section to subpoena (.2).	CP	\$275.00	0.50	\$137.50
02/28/2023	Correspondence with P. Arcia regarding additional association files.	CP	\$275.00	0.10	\$27.50
02/28/2023	Review and analyze documents provided by Rasco Klock pursuant to Receiver's request.	CP	\$275.00	1.70	\$467.50
02/28/2023	Review and analyze additional requested discovery from P. Arcia regarding representation.	CP	\$275.00	0.70	\$192.50
02/28/2023	Review and analyze letter from resident regarding MRTA (0.1).	RML	\$525.00	0.10	\$52.50

02/28/2023	Prepare for upcoming Status Conference by reviewing various materials related to insurance policies and claim against Crime Policy, the Association's vehicles, the personal injury claims asserted against Association, the Association's accounts and account balances, and other matters (.4); attend Status Conference, and seek instructions regarding submission of proposed Order granting same (.6); coordinate preparation of proposed Order, review and confirm all amounts, and coordinate submitting to Court for consideration and entry (.2); emails with Popular Bank regarding the various documents we provided to Bank for purposes of its quarterly review regarding the loan account and further discuss with team members additional documents requested (.2); emails with C. Perse regarding the search for records among the Association's documents on document management system for purposes of certain personal injury claims and provide further input regarding same (.2); discuss with M. Damian the status of obtaining account balance from TD Bank, send email to Bank following up on prior requests for issuance of cashier's check for account balance, and telephone call to Bank regarding same (.2); continue working with N. Garcia on compiling into consolidated chart all offers for vehicles to be sold, estimations of their value, whether they are being financed, and other details, provide direction regarding adding additional information to the chart, review and revise chart, and coordinate adding additional vehicles (.6); emails and discuss with N. Garcia issue with the Power of Attorney needed to obtain titles to the vehicles, communications with Auto Tag Agency regarding same, and coordinate preparing additional forms for certain of the Association's vehicles (.2); email from property manager providing statements from Ally Bank for the financed vehicles, review same, send email to N. Garcia regarding same, and emails with R. Landy regarding same and obtaining payoff quotes (.3); email from insurance broker forwarding bound insurance policy for Receiver and professionals, review same, and send to Receiver (.1); emails with forensic accountant regarding obtaining indictment, arrest warrant, or information from prior criminal action of one board members, review docket sheet, and strategize with team members regarding same (.3); email from homeowner regarding her access to new payment system, the balance on her account and application of certain prior payments, and the status of investigating payment sent to former counsel for the Association and strategize with team members regarding same (.2); email from N. Garcia regarding her investigation of certain properties of former board members, review mortgages and deeds, strategize regarding further investigation to be done, and forward same to M. Damian (.4).	KDM	\$525.00	3.90	\$2,047.50
02/28/2023	Work with Auto Tag agency to request title registration for vehicles.	ng	\$150.00	1.00	\$150.00
02/28/2023	[No charge] Work on forms and re-fill out the Power of Attorney for title registration request for each car.	ng		0.50	\$0.00

02/28/2023	[No charge] Work on chart of all of the offers for the vehicles, including the KBB comparison. Also, included the lien information on the vehicles with liens.	ng		0.50	\$0.00
02/28/2023	Investigate and analyze the addresses of Ghilardi and Lopez. Research any encumbrances, and other liens as well as property value.	ng	\$150.00	1.20	\$180.00
02/28/2023	Work on document with responses to insurance adjusters, research Cortland Rental Community, and investigate the location where one of the parties fell online.	ng	\$150.00	1.00	\$150.00
02/28/2023	Reviewing budget issues (.6); meeting with Melissa Vasquez regarding budget issues (.6).	MME	\$550.00	1.60	\$880.00
03/01/2023	Call with Western Equipment Financing regarding resolution of dispute (0.2); review and analyze email regarding ACC Application from Verrilli and draft response (0.1); review and revise Lake Doctor's proposed agreement (0.4); review and analyze documents and payoff quote provided by Western Equipment Financing and draft email to Receiver and Property Manager regarding same (0.2); work on claims against former attorneys (0.2); review and analyze proposed clubhouse facility rental documents and draft email response to Property Manager regarding same (0.1); review and revise subpoena for deposition duces tecum to Alfaro and Fernandez (0.2).	RML	\$525.00	1.40	\$735.00
03/01/2023	Supervise move of association documents to new storage facility.	CP	\$275.00	2.80	\$770.00
03/01/2023	[No charge] Correspondence with DISCO staff regarding data ingest process.	CP		0.20	\$0.00
03/01/2023	Finalize Power of Attorney forms for 32 vehicles.	ng	\$150.00	1.00	\$150.00
03/01/2023	Finalize response to claim adjusters.	ng	\$150.00	0.30	\$45.00
03/02/2023	Draft memorandum summarizing storage of association files.	CP	\$275.00	0.40	\$110.00
03/02/2023	[No charge] Correspondence with DISCO and accountant regarding document ingest tutorial.	CP		0.20	\$0.00
03/02/2023	[No charge] Edit motion directing One.com to turn over Hammocks associated email accounts.	CP		0.30	\$0.00
03/02/2023	Work on transfer and storage of Association records (0.1); email exchange with M. Ernst (0.1); review and analyze emails from Receiver (0.1); review and revise motion to compel against One.com (0.2); call from L. Rothenberg regarding Hilton Napoelon hearing on motion for order to show cause (0.3); draft email to client regarding same (0.1); work on strategy for obtaining records from former professionals and formulation of claims against them (0.6); email exchange regarding ACC applications (0.2); call with Receiver regarding litigation strategy (0.6); email exchange with Eric Thomspson regarding discovery subpoenas (0.1).	RML	\$525.00	2.40	\$1,260.00
03/02/2023	Edit subpoena to Alfaro & Fernandez LLP.	CP	\$275.00	0.20	\$55.00
03/02/2023	[No charge] Meet with R. Landy to assess pending items.	CP		0.60	\$0.00
03/02/2023	Investigate location of outdoor equipment provided by Playcore, Navitas.	CP	\$275.00	0.70	\$192.50

03/02/2023	[No charge] Draft subpoena and notice of taking deposition for E&J General Services.	jf		0.10	\$0.00
03/02/2023	Draft demand letter to Hermida Law requesting turn over of documents and funds.	CP	\$275.00	0.80	\$220.00
03/02/2023	Reviewing Turf proposal and responding (.2); reviewing and approving invoices (.3); telephone call with Receiver regarding Hilton Napoleon and status of other claim issues (.4).	MME	\$550.00	0.90	\$495.00
03/02/2023	Emails with Receiver regarding the offers to purchase the vehicles received to date and the timing of obtaining the titles for the vehicles and emails with N. Garcia regarding same (.2); emails with Receiver regarding his consideration of all offers to purchase vehicles to date and values of same and the timing of obtaining the titles from Auto Tag Agency, exchange emails with N. Garcia regarding same, discuss related matters, and provide direction regarding same, and send email to Receiver providing requested information (.4); emails with Receiver's office regarding the executed Power of Attorney forms for all of the vehicles and whether originals are required to obtain titles, review executed forms, and discuss with team members procedures regarding same (.2); emails with M. Dhanji, FSR and the Receiver regarding the disbursements to be made from the Hammock's new account and the status of obtaining funds from TD Bank (.1); telephone calls with TD Bank regarding same, send emails to TD Bank forwarding prior emails with Court Orders and requesting cashier's check for account balance, and send update to M. Damian regarding same (.7); review Appearance by counsel for Hilton Napoleon and discuss with team members for purposes of Motion for Order to Show Cause (.1); review recent Court filings in Chapter 13 cases of homeowners and discuss with team members (.2); emails with J. Serna regarding supplemental Subpoenas to send to certain banks to obtain additional records, review same, and follow up regarding status of making revisions (.2).	KDM	\$525.00	2.10	\$1,102.50
03/03/2023	Correspondence with P. Arcia regarding delay in turning over remaining files.	CP	\$275.00	0.20	\$55.00
03/03/2023	Edit motion to compel one.com to turn over email accounts to Receiver (.3); draft proposed order directing one.com to turn over email accounts to Receiver (.3); finalize motion (.2).	CP	\$275.00	0.80	\$220.00
03/03/2023	Review and revise demand letter to criminal counsel (0.3); call with Eric Thompson regarding subpoena to Alafaro & Fernandez (0.2) review and revise subpoena to Alafaro & Fernandez (0.3); draft email to L. Rothenberg regarding H. Napoleon production (0.2); review and analyze email from Property Manager regarding Association vehicle located in repair shop and demand for payment and draft response (0.2); call with counsel for H. Napoleon (0.3); review and analyze email from Lake Doctor regarding revision to agreement and draft response (0.1); review and revise motion directing compliance from one.com and proposed order on same (0.2).	RML	\$525.00	1.80	\$945.00
03/03/2023	Edit demand letter to Hermida Law Firm.	CP	\$275.00	0.40	\$110.00

03/03/2023	Reviewing correspondence and potential agreement with Hilton Napoleon counsel (.3); telephone call with other hilton napoleon counsel (.2); reviewing and approving invoices (.2).	MME	\$550.00	0.70	\$385.00
03/03/2023	Review and analyze emails from L. Rothenberg and draft responses (0.4); call with Receiver (0.3).	RML	\$525.00	0.70	\$367.50
03/03/2023	Email from adjuster for purposes of Proof of Loss submitted under Crime Policy requesting additional information and documents for the Association's claim, work on gathering and confirming information, review portions of the policy, discuss certain issues with C. Perez, and prepare and send detailed response providing additional information and directing adjuster to documents submitted with Proof of Loss (.9); emails with M. Damian and M. Dhanji regarding same and the W2 employees of the Association and review the W2s for certain years (.2); emails with M. Damian regarding the investigating of transfers from Association to real properties and Receiver's consideration of same (.1); emails with E. Thompson regarding the submission of notices of claims for two personal injury claims to the Association's general liability carrier and provide update regarding same, assignment of adjusters, and communications with adjusters regarding claims (.2); receive original Power of Attorney forms signed by Receiver and exchange emails with N. Garcia regarding the timing of submitting applications and Power of Attorney forms to the Auto Tag Agency to obtain titles for all vehicles owned by the Association and other matters related to the sale of the vehicles (.3); emails with R. Landy, N. Garcia, and property manager regarding the invoice from body shop for the repair of one vehicle to be sold, the value and purchase offers received for that vehicle, and other information regarding same and the other vehicles to be sold, review invoice, forward chart of all vehicles to be sold with explanation, and review information to be provided to Receiver regarding same (.4); emails with property manager and M. Damian regarding reports from homeowners regarding Association vehicle located and the status of having it repaired and review email from homeowner (.1); emails with R. Landy and Receiver regarding the SAO's locating stolen vehicle and status of gaining possession and discuss with team members (.1); emails with M. Damian and FSR regarding the account from which payment to IT professional was made and confirm same (.1); emails with R. Landy and C. Perse regarding draft Motion for Order Directing One.com to turn over account and account records, review same, and receive confirmation of filing (.2); review Notice of Taking Deposition of former counsel for Association and discuss with team members (.2); emails with M. Dhanji and FSR regarding the status of disbursements pursuant to Court Order and discuss with M. Dhanji (.1); review letter from American Express regarding our Subpoena for records and turnover demand, discuss with team members, and coordinate providing requested information to process our requests and turnover accounts and records (.2).	KDM	\$525.00	3.10	\$1,627.50

03/04/2023	Emails with Wix.com regarding the status of cancelling auto-pay and otherwise complying with Court Order and review Truist Bank account to confirm same (.2).	KDM	\$525.00	0.20	\$105.00
03/06/2023	Draft demand letter to Santiago Law (.4); draft demand letter to Marshall Dennehey, P.C. (.4); draft demand letter to Jauregui Law (.4).	CP	\$275.00	1.20	\$330.00
03/06/2023	[No charge] Attend Zoom conference with electronic discovery management software to develop discovery management strategy.	CP		0.70	\$0.00
03/06/2023	Draft correspondence to Ace Law regarding billing records.	CP	\$275.00	0.20	\$55.00
03/06/2023	Assess file and email for records provided by Ace Law (.3); correspondence with A. Escobar regarding compliance with Receiver's instructions (.1).	CP	\$275.00	0.40	\$110.00
03/06/2023	Research whereabouts of PTI Investigations (.4); draft subpoena to PTI investigations (.4); research whereabouts of A&F management (.3); draft subpoena to A&I Management (.2).	CP	\$275.00	1.30	\$357.50
03/06/2023	[No charge] Assess remaining work to be done at Tamarac, FL storage facility.	CP		0.20	\$0.00
03/06/2023	Review forensic accountant's bank chart and prepare various updated subpoenas to financial institutions requesting additional account information missing for their reconstruction.	js	\$100.00	2.10	\$210.00
03/06/2023	Work with Auto Tag Agency regarding car titles.	ng	\$150.00	0.50	\$75.00
03/06/2023	Review and analyze email from J. Rothenberg and work on hearing and document production strategy related to H. Napoelon (0.1); email exchange with Chief Tamayo regarding stolen vehicle recovery and email exchange with Property Manager regarding same (0.1); call from Rebecca Stone regarding demands to two former Association counsel firms and review and analyze records related to same (0.2); review and analyze emails from Property Manager regarding various items (0.2); review and analyze emails related to Association Vehicle located at garage and strategy related to same (0.3); work on obtaining records from criminal case (0.1); review and analyze demand letter related to Estate of Angelo Guzman wrongful death action and draft email to Receiver regarding same (0.4); review and analyze emails regarding Solitude Lake Management and provided documents (0.2).	RML	\$525.00	1.60	\$840.00

03/06/2023	<p>Emails with N. Garcia regarding her visit to Auto Tag Agency and cost to obtain titles to vehicles, and need for Ally Bank to release liens on 7 vehicles before new titles are issued and provide direction regarding same (.2); further emails with N. Garcia regarding need for additional information for the stolen or missing cars before new titles can be issued and provide direction regarding same (.2); review Notice of Cancellation of upcoming hearing on pending motions and discuss with team members (.1); further emails with property manager regarding approval of certain disbursements (.1); emails with R. Landy and N. Garcia regarding the repairs to be made to the stolen vehicle, invoice from repair shop, and recommendation to be made to Receiver regarding same, review email to Receiver regarding same, and emails with Receiver, R. Landy and property manager regarding obtaining back-up documents for the proposed repairs and investigating the repair shop (.3); review letter from Wells Fargo responding to Subpoena, exchange emails with team members, and coordinate agreeing to extension of response deadline or re-issuing Subpoena with extended due date (.2); email from forensic accountant regarding tracing funds from the Association to certain real properties and the additional documents required to complete tracing, and review spreadsheet provided incorporating related information (.2); emails with R. Landy and property manager regarding wrongful death claim asserted against Association and notice of claim and supporting documentation from counsel for Estate of decedent and his family, review same, email from R. Landy to Receiver regarding same, and prepare and send email to insurance broker forwarding claim to provide notice to insurance carrier (.4); review letter from American Express regarding its search for a merchant account of the Association and directing us to PayPal, and coordinate confirming the document requests in our Subpoena, contacting American Express regarding same, and preparing Subpoena to PayPal (.2).</p>	KDM	\$525.00	1.90	\$997.50
03/07/2023	Run discovery search for Cortland Residential contracts with Association and analyze results.	CP	\$275.00	1.00	\$275.00
03/07/2023	Review and analyze contract provided by Sport Surfaces and email exchange with Property Manager regarding same (0.2); review and analyze aquatic systems lake management contract (0.2).	RML	\$525.00	0.40	\$210.00
03/07/2023	Briefly review and sort priority mail sent to Hammocks Community Association.	CP	\$275.00	0.20	\$55.00
03/07/2023	Review and revise subpoenas for banks.	ng	\$150.00	0.50	\$75.00
03/07/2023	Analyze case law regarding the personal injury liability between a master HOA and a local community association, work on memorandum regarding same.	ng	\$150.00	1.10	\$165.00
03/07/2023	Review and analyze email from Western Equipment financing, draft response, and work on payoff strategy (0.1); review and revise demand letter to Jauregui law (0.1); review and revise subpoenas to A&F Management and PTI Investigations (0.2); email exchange with Rebecca Stone regarding former Association attorney records (0.1)	RML	\$525.00	0.50	\$262.50

03/07/2023	Further emails with insurance broker and Receiver regarding the wrongful death claim asserted against the Association and the notice provided to the general liability insurance carrier, follow up on same, and receive confirmation that carrier received notice and will assign adjuster and claim number (.3); further emails with general liability carrier and insurance broker regarding the demand and supporting documents from counsel asserting claim, the assignment of an adjuster and defense counsel, and the claim number and discuss with team members (.2); emails with C. Perse regarding efforts to obtain agreement between Association and Cortland for purposes of personal injury claim against Association and its general liability policy and provide direction regarding same and related matters (.2); follow up on status of preparing and issuing updated Subpoenas to various financial institutions to obtain documents needed by forensic accountants to complete their analysis, discuss with team members and provide further input regarding same, receive update regarding same, and review email forwarding issued Subpoenas to the parties (.3); emails with insurance broker and property manager regarding information needed to renew Crime Insurance policy, confirm expiration of current policy, and discuss with team members (.2); email from accounting firm hired by Crime Insurance carrier to assist with processing of Association's claim and proof of loss, requesting call and additional information, strategize regarding same, send email to forensic accountant to confirm her availability for call, and work on preparing for call with accountant (.6).	KDM	\$525.00	1.80	\$945.00
03/08/2023	Correspondence with P. Arcia regarding additional time records.	CP	\$275.00	0.20	\$55.00
03/08/2023	Revise letter to Jauregui Law (.3); revise letter to Marshall Dennehey (.2); revise letter to Santiago Legal (.2).	CP	\$275.00	0.70	\$192.50
03/08/2023	Revises subpoena to A&F Management (.2); revise subpoena to P&I Investigation (.2).	CP	\$275.00	0.40	\$110.00
03/08/2023	Zoom conference with A. Manuel of First Residential Property Management regarding start of services (.6); assess file for most recent Accounsult overall financial statements (.5).	CP	\$275.00	1.10	\$302.50
03/08/2023	Assess MRTA letter from property owner regarding Association covenants.	CP	\$275.00	0.30	\$82.50
03/08/2023	Attending advisory committee meeting (1.4); reviewing budget and meeting with Receiver regarding same (.5).	MME	\$550.00	1.90	\$1,045.00
03/08/2023	Call from Property Manager regarding accounts payable (0.1); call with Rebecca Stone regarding litigation strategy (0.3); work on discovery strategy from former Association vendors (0.1).	RML	\$525.00	0.50	\$262.50

03/08/2023	<p>Emails with forensic accountant regarding scheduling call with accountant of insurance carrier for purposes of processing Association's claim against Crime Policy, confirm dates, send email to carrier's accountant proposing dates for call, and strategize regarding the issues to discuss with accountant and preparing for call (.3); emails with adjuster for wrongful death claim against Association regarding information needed by general liability carrier to process claim, work with team members on gathering information, and send email to adjuster requesting he cease communicating with former board members on behalf of Association (.3); discuss with R. Landy communications with property manager regarding funds in the Association's account and the status of obtaining funds from former counsel for Association and TD Bank account (.2); coordinate preparation of Motion directing TD Bank to transfer account balance to the Estate, exchange emails with A. Pavon regarding same, and provide further direction to A. Pavon regarding authority for requested relief (.3); emails with Receiver regarding wrongful death demand letter and deadline to response and the status of the general liability insurance carrier's assigning adjuster and defense counsel and further discuss with team members (.2); emails with insurance adjuster for one of the personal injury claims against the Association follow up on his requests for certain documents, provide update regarding efforts to locate documents, and discuss with team members (.2); further emails with insurance broker regarding certain details regarding the wrongful death claim asserted against the Association, the notice provided to the carrier, and the adjuster assigned to the claim (.2); emails with insurance adjuster for the wrongful death claim requesting various information and documents, coordinate having N. Garcia and property manager confirm certain information and gather documents, work on confirming other information, and send email to adjuster providing preliminary information (.5); emails with counsel for THR Property Management regarding the Receiver's Subpoena and schedule call to discuss scope of requests and expedite production (.1); emails with M. Damian and R. Landy regarding the status of formulating claims against directors and officers and former counsel for the Association and scheduling call to discuss, and discuss with C. Perez claims against directors and officers (.2).</p>	KDM	\$525.00	2.50	\$1,312.50
03/09/2023	<p>Call with counsel for Rasco Klock (0.3); work on litigation claim analysis and formulation (0.3); call from Tamarac landlord regarding lease conclusion (0.1); call from S. Demos regarding subpoena to Alfaro and Fernandez (0.2); draft emails to Receiver regarding document production from former association counsel (0.3).</p>	RML	\$525.00	1.20	\$630.00
03/09/2023	<p>Assess order directing one.com to turn over accounts associated with Association (.1); correspondence with one.com regarding compliance with court order (.1).</p>	CP	\$275.00	0.20	\$55.00
03/09/2023	<p>Finalize updated subpoenas to financial institutions and send to process server for service.</p>	js	\$100.00	0.20	\$20.00
03/09/2023	<p>Draft notice of taking deposition for A&F Management of Florida and P.T.I. Investigations, Inc.</p>	jf	\$100.00	0.10	\$10.00

03/09/2023	Multiple calls with Cortland Residential and outside counsel regarding contracts with the Hammock's Community Association (.4); correspondence with Cortland outside counsel K. Hardee regarding follow up on contracts (.1).	CP	\$275.00	0.50	\$137.50
03/09/2023	Prepare for tomorrow's park and fitness on-site facility inspection.	CP	\$275.00	0.30	\$82.50
03/09/2023	Emails with insurance adjuster regarding communications with counsel for wrongful death claimant regarding extension of deadline to respond to demand, discuss with team members, and provide updated deadline to team members (.2); review Order directing One.com to turn over account and records, review emails with One.com regarding same, and further discuss with team members (.2); prepare for call with THR Property Management, review documents and checks related to same and emails and telephone call with counsel for THR Property Management regarding its relationship and financial dealings with the Association and the documents requested in the Receiver's Subpoena and timing of producing same and discuss with team members (.6); emails with insurance broker and property manager regarding the application for the renewal of the Crime Policy and various information needed for same and review draft application (.2); further emails with homeowner regarding the status of her account and whether certain payments she made have been credited to her account, review emails between homeowner and counsel for plaintiff regarding same, and send emails to FSR requesting confirmation of payments and account balance (.3); review Notice of Production of Documents from former counsel for Association and discuss with team members same and related matters (.2); review Notice of depositions of A&F Management and PTI Investigations and discuss with team members (.2); discuss with R. Landy the status of formulating claims against former officers and directors and former counsel for Association, further strategize with C. Perez regarding same and the provisions of the D&O policy, provide input regarding same, and send update to M. Damian regarding same (.9).	KDM	\$525.00	2.80	\$1,470.00
03/10/2023	Inspect ordered playground and fitness equipment at various locations at the Hammocks (3.0); assess photographs and corresponding contracts for discrepancies (.5); call with R. Landy discussing next steps for collections (.3).	CP	\$275.00	3.80	\$1,045.00
03/10/2023	Draft claw-back demand letter to H. Napoleon II P.A.	CP	\$275.00	0.30	\$82.50
03/10/2023	Multiple correspondence with P. Arcia regarding transfer of remaining files (.3); call with J. Arcia regarding final transfer of files (.2); begin assessment of new files provided (1.5); call with R. Landy regarding new material provided (.1).	CP	\$275.00	2.10	\$577.50
03/10/2023	Call with R. Landy regarding MRTA notice (.2); preliminary research of MRTA issues (.5).	CP	\$275.00	0.70	\$192.50

03/10/2023	Reviewing and revising form demand to counsel who represented board members in personal suits (.4); reviewing election issues and responding to emails (.3); reviewing and approving invoices (.3).	MME	\$550.00	1.00	\$550.00
03/10/2023	Review and analyze letter from J. Rothenberg and documents provided by H. Napoleon (0.3); draft email to Receiver regarding same (0.1); work on reduction of storage facility expenses (0.1); review and analyze issues related to demand from unit owner regarding MTRA (0.4); work on demand letter strategy (0.4); review and revise demand letters to attorneys (0.1); review and analyze documents provided by Paul Arcia (0.2); work on response to Navitas demand for payment related to playground and work equipment (0.3).	RML	\$525.00	1.90	\$997.50
03/10/2023	Emails with Receiver, M. Dhanji and R. Landy regarding the storage space and payment of the latest invoice (.1); emails with FSR regarding investigation of payments by one unit owner and the status of her account and balance and further emails with unit owner regarding same and issues caused by situation (.3); prepare for call with accountants for crime insurance carrier to discuss evidence in support of Proof of Loss and related matters (.3); attend call with accountant for carrier and Receiver's forensic accountant to discuss evidence in support of Proof of Loss and additional evidence and documents and filings from the state court civil and criminal actions action (1.2); further strategize with team members regarding same and begin gathering additional documents requested by carrier's accountant (.4); emails with Wix.com regarding deadline to renew domain for the Association's website, discuss with team members, and coordinate payment for renewal (.1); emails with team members and forensic accountant regarding timing of filing the next Report and fee application, email from forensic account forwarding invoice, and email from Receiver regarding same (.1).	KDM	\$525.00	2.50	\$1,312.50
03/12/2023	Reviewing proposed campaign rules (.3); reviewing ballot and procedures in advance of call (.3); zoom meeting with legal team regarding election (2.0).	MME	\$550.00	2.60	\$1,430.00
03/12/2023	Emails with forensic accountant and R. Landy regarding tracing funds from Association to its former counsel and counsel for board members and related matters and strategize regarding same and obtaining the relevant document for purposes of investigation (.3).	KDM	\$525.00	0.30	\$157.50
03/13/2023	Correspondence with A. Escobar regarding additional invoices and records regarding representation of Association (.2); assess billing documents provided (.3).	CP	\$275.00	0.50	\$137.50

03/13/2023	Review and analyze email from E. Tamayo and draft response (0.1); work on analysis of privilege issues (0.1); review and analyze email from L. Rothenberg regarding H. Napoleon document production (0.1); work on strategy related to recovery of funds from Ghilardi (0.6); work on claims against criminal counsel (0.2); analyze rental matters (0.1); call with Receiver and Property Manager regarding several legal issues and (1.1); call with Receiver regarding privilege strategy (0.2); call with forensic accountant regarding tracing and documents (0.5); review and analyze email from S. Demos regarding subpoena to Alfaro & Fernandez and draft response (0.2); confer with Tamrac landlord (0.2); work on ACC application initial review and draft email to ACC panel regarding same (0.7); work on strategy related to landscaping equipment (0.2); review and analyze documents related to former Association counsel (0.2); review and analyze Association documents related to fraudulent transfers (0.6); work on strategy related to Albri Consultants LLC and connection to fraud (0.5).	RML	\$525.00	5.60	\$2,940.00
03/13/2023	Correspondence with one.com support services regarding turnover of email accounts.	CP	\$275.00	0.20	\$55.00
03/13/2023	Call with GameTime representative regarding playground equipment installation (.3); multiple correspondence with representatives regarding order information (.3); draft correspondence regarding Receiver duties to obtain documentation (.2).	CP	\$275.00	0.80	\$220.00
03/13/2023	Conduct discovery search and assess retainers and invoices between Jauregui Law and the Association (.5); conduct discovery search and assess retainers and invoices between Quintero Broche and the Association (1.0); conduct discovery search and assess retainers and invoices between Hermida Law and the Association (.4); conduct discovery search and assess retainers and invoices between Santiago Legal and the Association (.9); conduct discovery search and assess retainers and invoices between Arcia Law and the Association (.5); organize results of document searches (.6).	CP	\$275.00	4.00	\$1,100.00
03/13/2023	Meet with R. Landy regarding various business entities receiving Association funds (.2); assess Sunbiz and Association records for connections and payments between Albri Consulting and Worldwide Business Solutions (.9).; meet with R. Landy and K. Murena regarding crime policy (.2).	CP	\$275.00	1.30	\$357.50
03/13/2023	Draft motion to direct TD Bank to transfer/turnover funds to	AP	\$325.00	1.30	\$422.50
03/13/2023	Assess Sunbiz and Association records for connections and payments between Albri Consulting and Worldwide Business Solutions.	CP	\$275.00	0.90	\$247.50
03/13/2023	Work with Ally Bank to obtain loan payoff information.	ng	\$150.00	0.30	\$45.00
03/13/2023	Work on sale of landscape equipment.	ng	\$150.00	0.80	\$120.00
03/13/2023	Finalize car title applications and work with Auto Tag Agency to file applications.	ng	\$150.00	0.50	\$75.00

03/13/2023	Meeting with Melissa Vasquez regarding cash flow issues and prioritizing payments (.6); reviewing cashflow statements, AP and financials and e-mail regarding same (.3); preparing agreed order on Hammocks Campaign rules (.3).	MME	\$550.00	1.20	\$660.00
03/13/2023	Emails with team members regarding the rescheduling of the hearing on Motion for Order to Show Cause against one former counsel for the Association and rescheduling of deposition of another former counsel and strategize regarding information to obtain from second proposed counsel before or at deposition (.3); emails with R. Landy regarding confirming certain information with former law firm for the Association and communicating with counsel for that firm regarding same and further strategize regarding same (.2); further emails with forensic accountant and R. Landy regarding additional records needed to trace funds from the Association to certain real property of former board members and related matters, and upcoming call to further discuss same (.2); emails with FSR regarding the account of one homeowner and the general ledger for same, review same, and exchange further emails with FSR regarding confirm whether Association received all payments from homeowner and former counsel for Association (.2); emails and telephone call with M. Damian regarding Truist Bank account, current balance and recent deposits from RevoPay, and transferring current balance to Association's CNB Account, work on initiating wire transfer to CNB account, and emails with Truist Bank representative to authorize transfer (.3); emails with M. Damian and FSR regarding the balance in Popular Bank checking account and upcoming loan payment from that account, login to account and confirm balance to cover future loan payments (.2); strategize with R. Landy and M. Damian regarding various claims against third parties and insurance policies, confirming transfers of funds and owners of companies to which transfers were made, gathering supporting documentations, and related matters, review certain documents, and confirm scheduling of meeting to further discuss same (.5); continue working on gathering documents requested by accountant for Crime Insurance Policy carrier for purposes of supporting the Receiver's Proof of Loss, follow up on obtaining Court filings from criminal action of former board member, and strategize regarding same (.5); emails with counsel for THR Property Management regarding various information regarding relationship and communications between THR and the Association and the documents to be produced in response to Subpoena, and request additional information and prioritize documents to be produced on rolling basis (.3).	KDM	\$525.00	2.70	\$1,417.50
03/14/2023	Correspondence with GameTime support staff regarding playground equipment purchase orders.	CP	\$275.00	0.20	\$55.00
03/14/2023	[No charge] Review emails from Melanie Damian regarding filing Receiver's Motion to Approve Campaign Rules; finalize exhibits; file and finalize Motion to Approve Campaign Rules; upload Agreed Order to CourtMaps.	lfd		0.40	\$0.00

03/14/2023	Work on payment strategy for Western Equipment Financing (0.1); prepare for and attend call with M. Ernst (0.3); work on clawback damages and claims (0.4); review and analyze documents provided by Paul Arcia (0.2); prepare for an attend ACC meeting (0.5); work on ACC application determinations (0.2); review and analyze Rasco Klock insurance policies and draft demand letter (1.0); review and analyze letter from counsel for H. Napoloeon and initial review of some documents produced (0.3).	RML	\$525.00	3.00	\$1,575.00
03/14/2023	[No charge] Assess order granting Receiver's motion to approve campaign rules.	CP		0.10	\$0.00
03/14/2023	Revise Hammocks car sale chart.	ng	\$150.00	0.10	\$15.00
03/14/2023	Revise chart for landscape equipment and research market and sale prices.	ng	\$150.00	1.00	\$150.00
03/14/2023	Contact Ally Bank to get payoff information.	ng	\$150.00	0.40	\$60.00
03/14/2023	Review and revise memorandum regarding Master Association and Sub Association.	ng	\$150.00	1.50	\$225.00
03/14/2023	Meeting with co-counsel regarding [redacted] (.6); meeting with potential counsel and receiver regarding third-party claims (.4); email of rules to candidates (.2).	MME	\$550.00	1.20	\$660.00

03/14/2023	<p>Emails with FSR and counsel for Plaintiff regarding the payments homeowners made to former counsel for the Association and that counsel's failure to remit payments to Association and the need for accounting of those funds from former counsel, and exchange emails with R. Landy regarding same and documents and information requested from that counsel (.3); discuss with M. Damian visiting TD Bank to deliver Court Orders and account freeze letter and have Bank issue Cashier's check for account balance to Association and gather and provide Orders and freeze letter (.2); emails with N. Garcia regarding the documents purporting to support wrongful death claim and providing documents and information to adjuster for the insurance claim, provide link to documents, confirm same, and strategize regarding same (.3); meet with M. Damian and R. Landy regarding claims against former board members and former counsel for the Association, insurance policies, and third parties, and documentary support for same, and strategize regarding same and further investigation to be done (.3); work with R. Landy on preparing letters demanding insurance policies from former counsel and notice of claim and demand for policy limits to insurance carriers and provide input regarding same (.2); telephone calls from and to Wells Fargo regarding Subpoena and documents requested and emails with R. Landy regarding same (.2); further emails with counsel for THR Property Management regarding extension of time to produce documents responsive to Subpoena and discuss with team members (.1); emails with N. Garcia regarding the status of obtaining titles for the 12 vehicles that can be sold and the updated list of offers and values of the vehicles, review same, and strategize regarding sales (.2); emails with forensic accountant regarding certain documents requested by the accountant for the Crime Insurance policy and work on locating other documents (.2); discuss with R. Landy the status of obtaining documents from former counsel for Association and rescheduling of hearing on Motion for Order to Show Cause (.1).</p>	KDM	\$525.00	2.10	\$1,102.50
03/14/2023	[No charge] Research and work with attorney and property manager to obtain claim adjuster information.	ng		0.40	\$0.00
03/15/2023	[No charge] Call with attorney M. Woodbury regarding A&F Management's compliance with subpoena (.2); multiple correspondence with M. Woodbury regarding extension (.3); multiple correspondence with M. Woodbury regarding previous letters sent to A&F (.3); assess previous letters sent to A&F (.2).	CP		1.00	\$0.00
03/15/2023	Assess arrest warrant for additional vendors (.3); work on obtaining response from former Association attorneys (.3).	CP	\$275.00	0.60	\$165.00
03/15/2023	Correspondence with Cortland attorney regarding party contracts.	CP	\$275.00	0.10	\$27.50

03/15/2023	Emails with R. Landy regarding the Arrest Warrant for Gallego and communications with SAO regarding same and related matters, review Arrest Warrant, and strategize regarding providing same to accountant for crime policy carrier for purposes of claim against policy (.4); multiple emails with forensic accountant regarding various documents and analyses to provide to accountant for crime policy carrier to support proof of loss, review documents, and work on email forwarding same with explanation to carrier's accountant (.9); review former counsel's Second Notice of Production of Documents and discuss with team members review of same (.2); emails with M. Dhanji regarding the latest statements from Truist Bank, login to account and download statements, and send to M. Dhanji (.2); emails with insurance broker regarding the status of completing application for renewal of crime policy and information needed from property manager for same and discuss with team members (.2); further strategize with team members regarding claims against former officers and directors and certain provisions of insurance policy and provide direction regarding formulation of claim for the Complaint (.5).	KDM	\$525.00	2.40	\$1,260.00
03/15/2023	Continue to draft demand letter to Rasco Klock insurer and draft email to client regarding same (0.3); work on strategy for claw back from former association counsel (0.1); review and analyze arrest warrant affidavit in Gallego Case No. F21-5594 (0.3); work on strategy related to A&F Management deposition (0.2); review and revise email responses to counsel for A&F management regarding deposition (0.3); review and analyze email from Chief Tamayo and draft response (0.1).	RML	\$525.00	1.30	\$682.50
03/15/2023	Reviewing and revising demand to Rasco Klock.	MME	\$550.00	0.30	\$165.00
				194.00	\$78,032.50

Costs & Expenses

Date	Description	Amount
02/03/2023	DLE Process Servers. Invoice 2023004247. Subpoena to be served on American Express subpoena Compliance Department. 02.3.23	\$105.00
02/06/2023	DLE Process Servers. Invoice 2023005017. Subpoena to be served on Thr Property Management L.P. c/o Corporation Service Company. 02.06.23	\$60.00
02/15/2023	Extra Space Storage. Storage 02.15.23	\$427.41
02/21/2023	Postage	\$3.00
02/22/2023	Postage	\$0.84
02/23/2023	DLE Process Servers. Invoice 2023003340. Subpoena to be served on Wells Fargo N.A. c/o Corporation Service Company. 2.23.23	\$60.00
02/24/2023	Extra Space Storage. 02.24.23	\$543.67
02/28/2023	Photocopies	\$2.16
02/28/2023	Lexis Nexis Advance Legal Research Fee	\$100.78
02/28/2023	Pacer/ Court Documents	\$7.00
02/28/2023	DLE process Servers. Invoice 2022055156. Subpoena to be served on Citi Bank Corporate legal. 01.10.23	\$105.00

03/08/2023	DLE Process Servers. Invoice 2023009587. Subpoena to be served on Records Custodian of Alfaro & Fernandez P.A 3.8.23	\$35.00
03/10/2023	DLE Process Servers. Invoice 2023010555. Subpoena to be served on Wells Fargo, N.A c/o Corporation Service Company as Registered Agent. 3.10.23	\$60.00
03/10/2023	DLE Process Servers. Invoice 2023010180. Subpoena to be served on American Express Subpoena Compliance Department, Subpoena Out of State, additional address. 3.10.23	\$210.00
03/13/2023	DLE Court Reporters. Invoice 24305. Deposition of Records Custodian of Alfaro & Fernandez. Late Cancellation. 03.13.23	\$95.00
03/14/2023	DLE Process Servers. Invoice 2023010688. Subpoena to be served on Records Custodian of A&F Management of Florida, Inc c/o Ms. Yudelkys Fernandez.	\$35.00
03/15/2023	DLE Process Servers. Invoice 2023010686. Subpoena to be served on Records Custodian of P.T.I. Investigation, Inc. 3.15.23	\$35.00

\$1,884.86

ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Reesea Saetae	rs	0.3	\$100.00	\$0.00
Christopher Perse	CP	38.3	\$275.00	\$9,350.00
Natalia Garcia Baerga	ng	27.3	\$150.00	\$3,000.00
Jeannette Serna	js	2.5	\$100.00	\$250.00
Russell Landy	RML	33.8	\$525.00	\$17,745.00
Melanie Damian	MME	26.5	\$550.00	\$14,575.00
Kenneth Murena	KDM	55.2	\$525.00	\$28,980.00
Casandra Murena	CPM	7.3	\$500.00	\$3,650.00
Lisa Fazzah-Diaz	lfd	0.7	\$100.00	\$0.00
Mary Dhanji	md	0.5	\$100.00	\$50.00
Jennifer Flores	jf	0.3	\$100.00	\$10.00
Adriana Pavon	AP	1.3	\$325.00	\$422.50

Invoice Amount: **\$79,917.36**

Amount Applied: **\$0.00**
Balance Due: \$79,917.36



CLICK TO PAY

Visit: <https://rapidpay.us>
 Ref: **220112627249**

Payments Since Last Invoice

Date	Description	Amount
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Hammocks Community

NOTICE is hereby given of the Meeting of the Advisory Board of Directors on **Tuesday, May 9, 2023, at 7:00 p.m.** The meeting will be held at the **Hammocks Clubhouse located at 9020 Hammocks Blvd., Miami, FL 33196.** Owners may attend in person or via Zoom at the following link or from the News tab of your website:

<https://us06web.zoom.us/TBD>

Order of Business:

1. Call to Order
2. Determination of a quorum
3. Proof of notice of meeting
4. Receiver's Status Report
5. New Business
 - a. TBD
 - b. TBD
 - c. TBD
6. Owners' Comments on Agenda Items
7. Adjournment

This notice was posted on Friday, May 5, 2023.