

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
Civil No. 08-5348 (ADM/JSM)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
1. THOMAS JOSEPH PETTERS;)
PETTERS COMPANY, INC., aka)
PCI; PETTERS GROUP WORLDWIDE, LLC;)
2. DEANNA COLEMAN aka DEANNA MUNSON;)
3. ROBERT WHITE;)
4. JAMES WEHMHOFF;)
5. LARRY REYNOLDS dba)
NATIONWIDE INTERNATIONAL RESOURCES)
aka NIR;)
6. MICHAEL CATAIN dba)
ENCHANTED FAMILY BUYING COMPANY;)
7. FRANK E. VENNES JR., dba)
METRO GEM FINANCE,)
METRO GEM INC.,)
GRACE OFFERINGS OF FLORIDA LLC,)
METRO PROPERTY FINANCING, LLC,)
38 E. ROBINSON, LLC,)
55 E. PINE, LLC,)
ORLANDO RENTAL POOL, LLC,)
100 PINE STREET PROPERTY, LLC,)
ORANGE STREET TOWER, LLC,)
CORNERSTONE RENTAL POOL, LLC,)
2 SOUTH ORANGE AVENUE, LLC,)
HOPE COMMONS, LLC,)
METRO GOLD, INC.;)
Defendants.)
)
DOUGLAS A. KELLEY,)
Receiver,)
)
GARY HANSEN,)
Receiver.)

performed, the name of the person performing the work, the time expended, and a detailed description of the task(s) performed. The statements set out the amount of compensation requested for the work performed and also request payment of reimbursable costs incurred in connection with the FTI engagement. They reflect a total of 253.70 hours, total fees of \$115,620.50, total costs of \$4,881.11, and a total amount due, including costs, of \$120,501.61.

4. The statements reflect the following with respect to the professionals providing services:

Name	Hours	Hourly Rate
Michael Buenzow	3.7	\$825 reduced to \$715
Mark Eaton	46.5	\$675 reduced to \$595
Christopher Brokmeier	120	\$455 reduced to \$385
Robert Gonzalez	82	\$520 reduced to \$475
Barbara Newby	1.5	\$105

5. I am familiar with the rates charged in the local community by other firms offering services similar to those provided by FTI and certify that the requested rates are within the range charged by consultants with comparable experience employed for work of a comparable nature and complexity.

6. I have reviewed the itemized statements describing services provided by FTI and certify that all of the stated work was actually performed and was necessary to fulfill my duties and responsibilities as Receiver. I further state that all unnecessary or duplicative

services or expenses were removed from the fee application.

7. I therefore request Court approval of the Receiver's fee application in favor of FTI in the total amount of \$99,649.53 fees and expenses incurred during the period January 13, 2009 through February 8, 2009.

8. I have reviewed the bank account balances for each individual receivership defendant. Their available funds are set forth below:

- a. Tom Petters - \$332,652.33;
- b. Deanna Coleman - \$2,501,871.64;
- c. Robert White - \$2,731,407.14;
- d. James Wehmhoff - \$1,764,369.17;
- e. Larry Reynolds - \$1,289,931.48; and
- f. Michael Catain - \$1,722,457.62.

FURTHER AFFIANT SAYETH NOT.

s/Douglas A. Kelley
Douglas A. Kelley

Subscribed and sworn to before me
this 17th day of September, 2009.

s/Tina M. Knoll
Notary Public