

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.)

requested for the work performed and also requests payment of reimbursable costs incurred in connection with the PwC engagement. It sets forth a total of 3,441.75 hours, total fees of \$1,206,038.00, and a total amount due, including costs, of \$1,326,100.67.

4. For the period December 16, 2008 through February 15, 2009, PwC personnel provided professional services to the Receiver as set forth below:

Name	Hourly Rate	Hours
Dyan Decker	\$600	37.10
Kevin Kreb	\$600	58.80
Michael Buersmeyer	\$520	10.60
Ted Martens	\$625	98.20
Ted Hawkins	\$600	2.0
Andrew Erzar	\$435	25.90
Beth Hannemann	\$450	233.50
Joseph Maselli	\$500	7.2
Mark Gerber	\$500	90.3
William Courtney	\$500	179.50
Bryan Humphrey	\$400	219.95
Janine Tanella	\$375	263.50
John Bigler	\$425	2.00
Alina Khomkova	\$340	5.00
Anna Kowalczuk	\$310	232.6
Carey Banner	\$340	207.30
Charles Bicknell	\$340	42.40
Eric Wu	\$310	221.80

Name	Hourly Rate	Hours
Jeffrey Hausman	\$340	285.50
Juhee Kim	\$310	97.50
Kevin Carter	\$340	1.00
Maisha Husband	\$340	15.50
Leah Johnson	\$310	4.10
Amber Lund	\$235	11.20
Austin Coop	\$250	186.20
Christopher Steffes	\$260	282.60
Haley Hubbard	\$255	267.90
Ilana Fried	\$250	282.10
James Larsen	\$255	73.80
Suet Man Moy	\$250	11.50

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

6. I have reviewed the itemized statements describing services provided by PwC 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 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.

8. I therefore request Court approval of the Receiver's fee application in favor of PwC in the amount of \$1,326,100.67 for fees and expenses incurred during the period December 16, 2008 through February 15, 2009.

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