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10 *Attorneys for Receiver Krista Freitag*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 **FEDERAL TRADE COMMISSION**

14 **Plaintiff,**

15 **v.**

16 **SUPERIOR SERVICING LLC, a**  
17 **limited liability company;**

18 **SUNRISE SOLUTIONS USA LLC, a**  
19 **limited liability company;**

20 **ALUMNI ADVANTAGE LLC, a**  
21 **limited liability company;**

22 **STUDENT PROCESSING CENTER**  
23 **GROUP LLC, a limited liability**  
24 **company;**

25 **SPCTWO LLC, a limited liability**  
26 **company;**

27 **ACCREDIT LLC, a limited liability**  
28 **company;**

**DENNISE MERDJANIAN, aka Dennise**  
**Correa, individually and as managing**  
**member of SUPERIOR**  
**SERVICING LLC;**

Case No. 2:24-cv-02163-GMN-MDC

**RECEIVER'S SECOND**  
**INTERIM REPORT**

1 ERIC CALDWELL, individually and as  
2 owner, officer, or manager of  
3 SUPERIOR SERVICING LLC,  
4 SUNRISE SOLUTIONS USA LLC,  
5 ALUMNI ADVANTAGE LLC,  
6 STUDENT PROCESSING CENTER  
7 GROUP LLC, SPCTWO LLC, and  
8 ACCREDIT LLC; and

9 DAVID HERNANDEZ, individually  
10 and as owner, officer, or manager of  
11 SUPERIOR SERVICING LLC,  
12 SUNRISE SOLUTIONS USA LLC,  
13 ALUMNI ADVANTAGE LLC,  
14 STUDENT PROCESSING CENTER  
15 GROUP LLC, SPCTWO LLC, and  
16 ACCREDIT LLC,

17 Defendants.

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1 Krista Freitag (“Receiver”), the Court-appointed permanent receiver for  
 2 Defendants Superior Servicing, LLC, Accredited LLC, Sunrise Solutions USA, LLC,  
 3 Alumni Advantage, LLC, Student Processing Center Group, LLC, and SPCTWO,  
 4 LLC, as well as Gold West Financial, LLC, DM Financial, LLC, LJC Music  
 5 National LLC, South Coast Services, LLC, Business Done Right Inc., ET&C  
 6 Holdings, LLC, Capital Servicing, LLC, Cornerstone Doc Prep, Inc., Amerifed Doc  
 7 Prep, LLC, Amerifed Servicing, Inc., Scholastic Solutions LLC, and First Clover  
 8 Capital, Inc. (collectively the “Receivership Entities” or individually, a  
 9 “Receivership Entity”) hereby submits this Receiver’s Second Interim Report  
 10 (“Second Interim Report”).

## 11 I. BACKGROUND

12 On November 22, 2024, this Court entered the Ex Parte Temporary  
 13 Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and  
 14 Other Equitable Relief, and Order to Show Cause Why Preliminary Injunction  
 15 Should Not Issue (the “TRO”), appointing Krista Freitag (“Receiver”) temporary  
 16 receiver for Superior Servicing, LLC (“Superior”), its subsidiaries, affiliates,  
 17 successors and assigns, and any other entity that has conducted any business related  
 18 to Defendants’ student debt relief services. (Dkt. 9). On December 5, 2024, a  
 19 hearing was held to determine whether the TRO should be made permanent and an  
 20 Order Granting Preliminary Injunction as to Defendant Superior Servicing LLC was  
 21 entered on December 6, 2025. (Dkt 30). On December 19, 2024, an additional  
 22 hearing was held to determine whether the TRO should be made permanent as to  
 23 Defendant Merdjanian and a Preliminary Injunction as to Defendant Dennise  
 24 Merdjanian was entered. (Dkt 42).<sup>1</sup>

25  
 26 <sup>1</sup> The Preliminary Injunction Order entered on December 19, 2024 also  
 27 specifically added Accredited, LLC, Sunrise Solutions USA, LLC, Alumni  
 28 Advantage, LLC, Student Processing Center Group, LLC, SPCTWO, LLC, Gold  
 West Financial, LLC, DM Financial, LLC, LJC Music National LLC, South  
 Coast Services, LLC, Business Done Right Inc., ET&C Holdings, LLC, Capital

## II. EXECUTIVE SUMMARY

On November 18, 2024, the Commission filed its Complaint against Superior and Merdjanian. The Complaint alleges that Superior and Merdjanian engaged in alleged unlawful acts and practices as part of a scheme preying on student loan borrowers seeking relief from their loan repayment obligations. The Commission's allegations include, but are not limited to, (a) deceptive marketing, misrepresentation of student loan debt relief program services, (b) inaction with providing the represented student loan debt relief program services to be provided (e.g., they do not enroll consumers in federal debt relief programs, reduce or eliminate their student loan payments or balance, or apply payments to consumers' loans) and (c) in connection with telemarketing of student loan debt relief program services, requests and receipt of payments of a fee or consideration for debt relief services before debt relief was obtained. On March 26, 2025, the Commission filed its First Amended Complaint, adding as Defendants Sunrise Solutions USA LLC, Alumni Advantage LLC, Student Processing Center Group LLC, SPCTWO LLC, Accredited LLC, Eric Caldwell ("Caldwell"), and David Hernandez ("Hernandez").

Upon entry of the TRO, the Receiver and her team worked to review as much of the Complaint and evidence submitted by the Commission as possible. On Friday, November 22, 2024, Monday, November 25, 2024, and Wednesday, December 4, 2024, the Receiver successfully obtained possession of and secured the following physical locations:

- 500 South Kraemer Blvd., Suite 100b, Brea, CA 92821 (this space had previously been vacated in September/October of 2024),
- 3020 Saturn Street, Suite 200, Brea, CA 92821; and
- 3230 E. Imperial Highway, Suite 206, Brea, CA 92821.

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Servicing, LLC, Cornerstone Doc Prep, Inc., Amerifed Doc Prep, LLC, Amerifed Servicing, Inc., Scholastic Solutions LLC, and First Clover Capital, Inc. as defined Receivership Entities. The Receiver has also determined that Student Processing Center, LLC is a Receivership Entity.

1 Based on the Receiver's prompt, initial investigation of documents and  
 2 computer records, through March 31, 2025, the Receiver was able to identify and  
 3 recover \$842,232.23<sup>2</sup> of Receivership Entity cash (defined below) plus \$300,000  
 4 held in trust for Superior with a payment processor and a \$5,000 legal retainer. No  
 5 additional funds held in trust by payment processors have been discovered. Finally,  
 6 the Receiver has tendered two claims on employee dishonesty coverage on two  
 7 separate insurance policies discovered in the records of the companies and made  
 8 demand on City National Bank for (minimal) cash balances in two accounts.

9 As previously reported, Superior is one of a series of entities, all set up and  
 10 operated in very similar fashion, that operated an overall student loan debt relief  
 11 enterprise. As noted in the Declaration of Krista Freitag Regarding Preliminary  
 12 Investigative Findings and Observations filed on December 4, 2024 (Dkt. No. 23),  
 13 various documentation and bank record observations showed that Defendant  
 14 Merdjanian, who appears on paper to be in control of Superior, may have had less  
 15 control and less ownership in the enterprise than Caldwell and Hernandez. As a  
 16 result of the Receiver's observations and evidence reported to this Court, the Court  
 17 entered an expanded Court Order on December 19, 2024.

18 This quarterly report covers the Receiver's activities during the last few  
 19 weeks of the fourth quarter 2024 and the first quarter of 2025, including accounting  
 20 information from inception of the receivership on November 22, 2024 through  
 21 March 31, 2025.

### 22 **III. SUMMARY OF RECEIVER'S ACTIVITIES**

#### 23 **A. Business Operations**

24 As noted above, shortly after her appointment, the Receiver assumed control  
 25 over the leased premises located at 500 South Kraemer Blvd., Suite 100b, Brea, CA  
 26 92821 (the "Kraemer Office"), 3020 Saturn Street, Suite 200, Brea, CA 92821

27 <sup>2</sup> The breakdown of this amount by entity is shown below in Funds Recovered,  
 28 Receipts and Disbursements section.

1 (“Saturn Office”) and 3230 E. Imperial Highway, Suite 206, Brea, CA 92821  
2 (“Imperial Office”). As a result of the Receiver’s extensive efforts to identify  
3 physical locations, numerous former and virtual and/or post office box location  
4 addresses were discovered and contacts associated with same thus served.

5 With regard to all three office locations, the Receiver took physical control,  
6 changed the locks, served/notified the landlord (through property management),  
7 served/notified key vendors (to include subpoenaing records from same), and  
8 otherwise worked to ensure no entry into the premises. The Receiver’s staff also  
9 “froze”, collected and/or redirected mail for all the virtual office location addresses  
10 discovered.

11 As previously discussed, the Receiver and her staff met with and interviewed  
12 the five (5) individuals who were present and subsequently interviewed a few of the  
13 four (4) customer service representatives not physically present at the Saturn Office.  
14 The Receiver and her staff also reached out to Imperial Office employees to conduct  
15 interviews therewith as well; very few responded to the Receiver’s staff. The  
16 entities’ staff member for IT related work also cooperated with an interview and in  
17 providing data and records in his possession.

18 In such interviews, notably and specifically regarding how client payments  
19 work, several employees stated that if payment was not made by customers, work  
20 was not performed on said customer’s file. Furthermore, based upon (a) emails  
21 observed whereby customer service employees sent emails to customers (b) sample  
22 customer data pulled from the CRM software showing payment requirements in the  
23 contract and advance payments reflected in the CRM system, (c) emails from upset  
24 and/or confused customers, and (d) other information gleaned from interviews  
25 whereby customer service representatives acknowledged that they would not help a  
26 non-paying customer, it appears that clients were required to pay advance fees for  
27 student loan debt relief services.

28

Pursuant to the Receiver's observations discussed above, along with the Court's initial findings and orders, the Receiver suspended business operations and communicated with employees of the Receivership Entities and customers as efficiently as possible regarding the entry of the Court's orders in this matter. Updates have also been posted to the receivership's website and employees working in the physical premises were also provided an opportunity to retrieve personal belongings on several occasions.

The Receiver's staff conferred with the third-party payroll processing company ADP to coordinate processing of 2024 payroll reports, and issuance of W-2's and 1099's. The Receiver served and contacted the Receivership Entities' accounting firm and has coordinated with same to cost-effectively complete the 2024 books and tax returns (as applicable); notably, 2024 tax returns extensions were filed and a changeover of registered agent has been completed or is in process for the following entities:

Accredit, LLC  
 Business Done Right Inc.  
 DM Financial, LLC  
 ET&C Holdings, LLC  
 Gold West Financial LLC  
 SPCTWO, LLC  
 Student Processing Center LLC  
 Sunrise Solutions USA LLC  
 Superior Servicing LLC

## **B. Funds Recovered, Receipts and Disbursements**

In addition to the Commission's asset freeze notifications, the Receiver also promptly notified each bank and payment processor identified as having an account associated with the Receivership Entities' enterprise. As previously mentioned, as

of March 31, 2025, the Receivership Entities' known and recovered cash balances totaled \$842,232.23 plus \$300,000.00 held in trust by a payment processor for Superior.

All aforementioned funds were transferred into the Receiver's new bank account for the receivership estate, which funds are in an insured cash sweep program, which not only earns interest, but also fully protects the funds in FDIC-insured accounts.

The following reflects the cash activity of the receivership estate for the period from November 22, 2024 through March 31, 2025. A summary of the receipts and disbursements is as follows:

Accredit LLC	\$373,070
Business Done Right Inc	\$21,738
DM Financial, LLC	\$230,056
ET & C Holdings LLC	\$353
Gold West Financial LLC	\$37,304
SPCTWO LLC	\$47,111
Student Processing Center LLC	\$96,485
Sunrise Solutions USA LLC	\$28,080
Superior Servicing LLC	\$8,035
<b>SUBTOTAL BANK BALANCES<sup>3</sup></b>	<b>\$842,232</b>
Credit Card Processing Recovery	\$300,000
Legal Retainer Recovery	\$5,000
Interest Income	\$4,477
<b>SUBTOTAL OTHER RECEIPTS</b>	<b>\$309,477</b>
<b>TOTAL RECEIPTS</b>	<b>\$1,151,709</b>

<sup>3</sup> Some funds were collected from customers after the TRO and PI Orders due to the timing of entities being added to the receivership estate and funds being recovered.

General & Administrative Expenses	(\$15,715)
Receiver Fees and Expenses	(\$134,104)
Receivership Legal Fees and Expenses	(\$71,536)
<b>TOTAL DISBURSEMENTS</b>	<b>(\$221,355)</b>
<b>CASH BALANCE AT MARCH 31, 2025</b>	<b>\$930,354</b>

### C. Affiliated Entities and/or URLs

As noted above, Superior is part of a student loan debt relief enterprise of affiliated entities owned and controlled by Caldwell, Hernandez and Merdjanian. Through investigation and review of records and the Commission's filings, the Receiver identified the following entities and/or URLs, which appear to be affiliated with Superior, Merdjanian, Caldwell, Hernandez, and the larger enterprise:

- **Accredit, LLC**
  - [www.theaccredit.com](http://www.theaccredit.com)
- **Sunrise Solutions USA, LLC**
  - <http://www.sunrisesolutionsllc.com>
- **Alumni Advantage, LLC**
  - <http://www.alumniadvantage.com>
- **Student Processing Center Group, LLC (and/or Student Processing Center, LLC)**
  - <http://www.studentprocessingcenter.com>
- **SPCTWO, LLC**
  - <http://www.spctwo.com>
- **Gold West Financial, LLC**
  - <http://www.goldwestfinancial.com>
- **DM Financial, LLC**
- **LJC Music National LLC (lease for Kraemer Office in this name)**
- **South Coast Services, LLC**

- 1 • **Business Done Right, Inc.**
- 2 • **ET&C Holdings, LLC**
- 3 • **Capital Servicing, LLC**
- 4 • **Cornerstone Doc Prep, Inc**
- 5 • **Amerifed Doc Prep, LLC**
- 6 • **Amerifed Servicing, Inc.**
- 7 • **Scholastic Solutions LLC**
- 8 • **First Clover Capital, Inc.**
- 9

10 **D. Control Over Computer Hardware, Software and Documents**

11 Upon entry to the Kraemer Office, the Receiver took control over computers  
 12 and limited documents which remained in that office (it was largely vacated). Upon  
 13 entry of the Saturn Street Office and subsequently, the Imperial Office, the Receiver  
 14 and her staff took control over computers and the books and records located therein.  
 15 Pursuant to the TRO, the Receiver retained the services of HKA Global, LLC, a  
 16 forensic computer consultant, to image workstation hard drives located at the Saturn  
 17 Street and Imperial Offices; various of the IT employee's devices and entity email  
 18 accounts have also been imaged by HKA. Numerous computers were not set up in  
 19 workstations; those computers were secured but not imaged.

20 As part of her effort to preserve the electronic and hard copy documents  
 21 associated with the Receivership Entities' enterprise, the Receiver also served  
 22 vendors, and other third parties (including the internet service provider, website  
 23 host, CRM service provider, telephone service provider, and other key vendors  
 24 known to service the Receivership Entities) with copies of the Court's Orders and  
 25 made a demand that each of them preserve all electronic and other documents in  
 26 their possession, custody or control as provided for in the Orders.

27 Employees stated there are no social media accounts. The website hosting  
 28 company Go Daddy was used by the companies to secure the Receivership Entities'

1 domains. While the Receiver did serve the TRO and subsequently the PI on Go  
2 Daddy, their cooperation to date has been minimal. Go Daddy has required a  
3 specific Court Order directing them to turn over possession of the domains to the  
4 Receiver before offering the Receiver control over the domains. Absent that Order,  
5 the Receiver reached out to Caldwell and Merdjanian who turned over the logins  
6 and passwords to the Go Daddy accounts for: (1) studentprocessingcenter.com; (2)  
7 SPCTWO.com; (3) theaccredit.com; (4) superior servicing.net; and (5)  
8 sunrisesolutionsllc.org. Once under her control, the Receiver discovered that as part  
9 of GoDaddy's freeze, she was unable to forward the domains to the Receiver's  
10 website to inform customers of the receivership. Alternatively, the Receiver has  
11 directed a change to the respective websites to include information about the  
12 receivership including a link to the receivership website. To date, GoDaddy has  
13 refused to grant the Receiver control of the domains absent the aforementioned  
14 Order.

15 GoDaddy is also the reseller of the Microsoft email accounts used by the  
16 enterprise. The Receiver was also able to gain access to some email accounts once  
17 given control of the domains by Caldwell and Merdjanian. However, at that time, it  
18 was noted that most email accounts for each domain had been deleted. Some email  
19 accounts have been recovered, but approximately 35 accounts have not been  
20 recovered. The Receiver is working with Microsoft to determine if they can recover  
21 those accounts absent a Court order. In the event the Receiver deems it necessary  
22 and/or fruitful, she will file a motion to compel GoDaddy and Microsoft to provide  
23 access and turnover records.

24 For Customer Relationship Management software (CRM), the Receiver was  
25 able to provide prompt notice to DebtPayPro.com, also known as Forth.com. That  
26 software was the customer database used by the enterprises to manage the various  
27 customer interactions and to engage in regular billing. Forth.com has provided the  
28 Receiver with access to the system.

1 Slack.com, an internal communications platform, was used by the enterprise  
2 in conjunction with email to coordinate their various efforts. The platform works  
3 similar to a chat and file exchange service. Like GoDaddy, Slack at first requested a  
4 specific order to turn over access to the communications, however, once the  
5 Receiver was able to show that the domain websites reflected receivership  
6 information, they provided the Receiver with a static copy of the data, along with  
7 access to the service to review the information.

8 **E. Personal Property**

9 During the Receiver's takeover of the office premises, she and her staff took a  
10 photographic inventory. For the most part, the personal property consisted of  
11 CPU's, computer monitors/keyboards/mice, cubicles and other miscellaneous office  
12 furniture, fixtures and equipment.

13 On November 24, 2024, the Receiver accessed the Kraemer office to  
14 assess/retrieve the inventory of computer equipment. The following day, the  
15 Receivership team, accompanied by a U.S. Marshal, accessed the Saturn office.  
16 There, the locks were changed, sensitive computer equipment secured, and  
17 inventory recorded. HKA, the Receiver's forensic computer consultant, was also  
18 present to create images of workstation hard drives.

19 On December 4, 2024, the Receiver gained access to the Imperial office.  
20 Similar procedures were followed: the locks were changed, sensitive computer  
21 equipment secured, and inventory recorded. HKA was again present to create  
22 images of workstation hard drives. The computer equipment recovered from the  
23 Kraemer office was transferred and ultimately temporarily stored at the Saturn and  
24 then Imperial Offices.

25 From January 29, 2025 to January 31, 2025, the Receivership team completed  
26 the inventory recording and commenced packing and preparing both the Saturn and  
27 Imperial offices for move-out (the Kraemer office was already vacated after the  
28 computer equipment was removed). Despite several attempts to contact auctioneers

1 and office equipment dealers, there was no interest in the furniture and fixtures at  
2 the office locations. Consequently, the Receiver opted to leave all furniture and  
3 fixtures in the offices and to move only the records, computers and electronic  
4 equipment into storage.

5 On February 24, 2025, the Receivership team finished preparing for the  
6 move-out from both the Saturn and Imperial offices. The offices were fully vacated  
7 and returned to the respective landlords on February 25, 2025. The equipment was  
8 securely transferred through a chain of custody by a commercial moving company  
9 and the Receiver's staff to a secured storage facility on that same date. Finally, the  
10 Receiver was able to secure a payment of \$1,000 from the landlord of the Saturn  
11 property in exchange for resolving the company's security deposit, past due rent and  
12 the equipment that was being left onsite. The other landlords were willing to keep  
13 the equipment without additional charges to the company. Leaving the equipment  
14 saved the receivership estate additional costs for moving and storage. Considering  
15 that various auctioneers declined interest in selling or even collecting the furniture  
16 and fixtures for free, removing and disposing of the furniture and equipment would  
17 have been a net expense to the receivership estate.

18 **F. Pending Litigation**

19 The Receiver is aware that two entities associated with the enterprise,  
20 Amerifed Doc Prep and Cornerstone Doc Prep, along with Caldwell, were  
21 investigated by state regulatory agencies in Colorado, Minnesota, and California,  
22 which reportedly led to them being shut down. Similarly, Superior was investigated  
23 by state regulators in Washington after it was shut down earlier this year. In  
24 addition, the New York Attorney General's office recently (October 2024) contacted  
25 Superior via email about a complaint received from a consumer and asked for a  
26 response thereto. The Receiver is not currently aware of any active lawsuits brought  
27 by or against Superior or any of its affiliated entities (other than the instant action).  
28

1           **G. Territorial Jurisdiction Over Receivership Assets**

2           By filing the Complaint and the TRO with other federal district courts in the  
3 United States, the territorial jurisdiction of this Court over receivership assets is  
4 extended to such districts. 28 U.S.C. § 754, *see also Haile v. Henderson Nat'l Bank*,  
5 657 Fed. 2d 816, 822 (6th Cir. 1981). Based on information obtained to date,  
6 Receiver's counsel obtained a certified copy of the Complaint, TRO (with the case  
7 docket just being unsealed on December 2, 2024) and PI orders and filed them in the  
8 Central District of California. As additional information becomes available, the  
9 Receiver will file and record the Amended Complaint and the appointment order in  
10 applicable districts and counties in conformity with Section 754 and federal law.

11           **H. Borrower/Client Communications**

12           The Receiver has established a dedicated web page on the Receiver's website  
13 which is used to provide case information, regular updates, and answers to  
14 frequently asked questions to employees and customers. The Internet address for  
15 the webpage is: <http://www.superiorservicingreceivership.com>. In addition, the  
16 Receiver is maintaining a dedicated e-mail address and telephone line for all  
17 inquiries, details for which are provided on the aforementioned website.

18           As previously mentioned, the Receiver was unable to forward the companies'  
19 domains to the receivership website. However, the Receiver was able to edit the  
20 respective websites to remove all content other than basic information on the case  
21 and directing visitors to the Receivership website. Additionally, as the Receiver  
22 gained access to various email accounts, the Receiver forwarded all incoming email  
23 to those accounts to a Receiver controlled email account. All incoming email to  
24 those accounts auto-responds advising about the receivership.

25   **IV. RECOMMENDATIONS**

26           The Receiver's efforts to marshal and recover assets and relevant  
27 Receivership Entity documents and records are ongoing in an efficient manner. For  
28

1 the near term, the Receiver and her professionals hereby make the following  
2 recommendations.

3 **A. Document Recovery Efforts**

4 The Receiver has and will continue to obtain records from all known financial  
5 institutions where the Receivership Entities maintained accounts as well as from  
6 attorneys and accountants engaged by the Receivership Entities. The Receiver has  
7 served subpoenas on certain institutions, individuals, and entities and proposes to  
8 proceed with these efforts to obtain documents, assets, and information.

9 **B. Receivership Asset Recovery Efforts and Investigation**

10 The Receiver will seek to locate, secure, and facilitate turnover, of any  
11 unaccounted for receivership assets that may exist. As a result of her accounting  
12 (further discussed below) and other documentation, the Receiver has identified and  
13 become aware of prospective assets either owned by receivership entities or  
14 purchased with receivership entity funds. The Receiver is currently preparing to set  
15 up interviews with each individual Defendant (Caldwell, Hernandez and  
16 Merdjanian) to discuss turnover and specifics of the use of millions of receivership  
17 entity dollars, as appropriate. Further, the Receiver may evaluate claims to pursue  
18 recovery of assets of the Receivership Entities from third parties, but would seek  
19 Court approval before pursuing any such claims.

20 **C. Accounting**

21 Despite demands/requests therefor, with incomplete financial records  
22 available or turned over to the Receiver for many of the receivership entities'  
23 activities, in the interest of time and cost-efficiency but in order to identify the  
24 majority of the Receivership Entities' sources (including customer deposits into the  
25 enterprise) and uses of funds (where the funds went, including potential asset  
26 identification), the Receiver has performed an initial high-level preliminary  
27 accounting of the bank record data received to date in accordance with the Court's  
28

1 orders. The Receiver intends to file a summary reflecting the results of this high-  
 2 level preliminary accounting in the near term.

3 It is important to note that while the Receiver has subpoenas pending for  
 4 several additional bank accounts, she has not determined if additional forensic  
 5 analysis will be performed once those records are received and reviewed.  
 6 Regardless, the preliminary accounting, which is subject to being revised, is being  
 7 used to identify an initial net harm amount to customers, as well as to help identify  
 8 where the funds went and to help with prospective asset recovery.

### 9 V. CONCLUSION

10 Based upon the Receiver's preliminary investigation and findings, the  
 11 Receiver recommends and requests that the Court order the Receiver to continue her  
 12 duties pursuant to the TRO and supplemental PI orders issued by the Court. The  
 13 Receiver also requests the Court authorize her continuing investigation and approve  
 14 this second report and recommendations.

15  
 16 Dated: May 9, 2025

  
 KRISTA FREITAG  
 Court-Appointed Receiver

17  
 18  
 19 Dated: May 9, 2025

ALLEN MATKINS LECK GAMBLE  
 MALLORY & NATSIS LLP

20  
 21 By: /s/ Edward G. Fates

EDWARD G. FATES  
 Attorneys for Court-Appointed  
 Receiver  
 KRISTA FREITAG

**CERTIFICATE OF SERVICE**

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is One America Plaza, 600 West Broadway, 27th Floor, San Diego, California 92101-0903.

On May 9, 2025, I used the United States District Court, District of Nevada's Electronic Case Filing System, with the ECF registered to Edward G. Fates to file the following document(s):

**RECEIVER'S SECOND INTERIM REPORT**

The ECF system is designed to send an e-mail message to all parties in the case, which constitutes service. The parties served by e-mail in this case are found on the Court's Electronic Mail Notice List.

- **Luis H Gallegos**  
lgallegos@ftc.gov; egarcia@ftc.gov;  
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2025, at San Diego, California.

/s/ Pamela Tei Lewis  
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