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Attorneys for Receiver Jonathan O. Hafen

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

COMMODITY FUTURES TRADING
COMMISSION, and
STATE OF UTAH DIVISION OF
SECURITIES, through Attorney General Sean
D. Reyes,

Plaintiffs,

vs.

RUST RARE COIN INC., a Utah corporation,
and GAYLEN DEAN RUST, an individual,
DENISE GUNDERSON RUST, an individual,
JOSHUA DANIEL RUST, an individual,

Defendants;

and

ALEESHA RUST FRANKLIN, an individual,
R LEGACY RACING INC, a Utah
corporation, R LEGACY ENTERTAINMENT
LLC, a Utah limited liability company, and R
LEGACY INVESTMENTS LLC, a Utah
limited liability company.

Relief Defendants.

**THIRTIETH INTERIM FEE
APPLICATION**

Civil No. 2:18-cv-00892-TC

Judge Tena Campbell

Magistrate Judge Dustin Pead

Jonathan O. Hafen, the Court-Appointed Receiver over the assets of the following Defendants and Relief Defendants: Rust Rare Coin Inc. (“RRC”), Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Gaylen Dean Rust, Denise Gunderson Rust, Joshua Daniel Rust, and Aleesha Rust Franklin (collectively, “Receivership Defendants”), hereby submits this thirtieth interim fee application (this “Fee Application”), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”) and Sacks Tierney P.A. (“Arizona Counsel”); and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of January 1, 2026, through March 31, 2026 (the “Application Period”). The Receiver seeks authorization to pay all allowed fees and expenses from the Receivership Estate once the Receiver has recovered an amount equal to three times the fees requested in this Fee Application and allowed in prior applications. In support hereof, the Receiver states as follows:

I. RELEVANT BACKGROUND

1. On November 27, 2018, the Court entered an *Order Appointing Receiver and Staying Litigation* (the “Appointment Order”). *See* Dkt. No. 54. Accordingly, the Receiver has worked in concert with his counsel, Parr Brown, and his accountants, BRG, to identify, secure, and liquidate various Receivership assets, identify claimants and creditors of the Receivership Estate, and identify and initiate discussions with net winners to recover funds for the benefit of all Receivership claimants.

2. The Receiver has filed his *Thirtieth Quarterly Status Report*, which includes a status report for the period of January 1, 2026, through March 31, 2026 (the “Quarterly Status

Report”).¹ The Quarterly Status Report provides a comprehensive description of the services performed by the Receiver and his professionals during the Application Period and is incorporated herein by reference.

II. REQUEST FOR COURT APPROVAL OF FEES AND EXPENSES

3. The Appointment Order provides, in the relevant part:

57. Subject to Paragraph 59 immediately below, the Receiver is authorized to solicit persons and entities (“Retained Personnel”) to assist him in carrying out the duties and responsibilities described in this Order. The Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement.

58. The Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates. The Receiver and Retained Personnel shall not be compensated or reimbursed by, or otherwise entitled to, any funds from the Court, the CFTC, or the State of Utah. Such compensation shall require the prior review by Plaintiffs and approval of the Court.

4. Accordingly, the Receiver respectfully requests that the Court approve the fees and expenses incurred by the Receiver and his team, and BRG, as set forth below and in the attached Exhibits.

III. FEES AND EXPENSES REQUESTED ARE ACTUAL, NECESSARY AND REASONABLE FOR THE SERVICES RENDERED

5. During this Application Period, the Receiver and his professionals have provided actual and necessary services for the Receivership Estate as summarized below and detailed in the Exhibits attached hereto. The Exhibits also detail the out-of-pocket expenses incurred by the professionals in rendering services to the Receivership Estate.

¹ Docket No. 584 filed April 30, 2026.

6. Parr Brown, Arizona Counsel and BRG have submitted their invoices to the Receiver, and the Receiver has reviewed and approved the invoices.

7. This Fee Application complies with the billing instructions set forth in the Appointment Order. The Receiver submitted this Fee Application to the Utah Division of Securities and CFTC prior to filing it with the Court, and both have informed the Receiver that they have no objection to the payment of the fees and reimbursement of the expenses outlined herein.

8. The Receiver believes that the fees and expenses are reasonable. The Receiver also believes that the services rendered and the expenses advanced have been beneficial to the Receivership Estate.

9. Consistent with the Receiver's previous fee applications, the Receiver and his professionals have continued to write off time and delay payment to assure that the Receivership Estate will receive an amount at least three times in excess of any fees requested *before* the Receiver and his professionals are paid. In this Fee Application, the Receiver has voluntarily written off all time related to the preparation of any fee application and has otherwise made voluntary downward adjustments to fees and expenses as appropriate.

IV. SUMMARY OF AMOUNTS REQUESTED

10. The total amounts requested for the Receiver, his professionals, BRG and Arizona Counsel in this Fee Application, including the relevant voluntary write downs, are summarized below:

- a. Receiver: From January 1, 2026, through March 31, 2026, the Receiver billed a total of 21.6 hours for services to the Receivership Estate. The Receiver is seeking

approval for the payment of fees and expenses totaling \$11,880.00. *See Exhibit A.*

b. Parr Brown: From January 1, 2026, through March 31, 2026, Parr Brown billed a total of 123.5 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$55,013.47. *See Exhibit B.* These amounts include a voluntary write down of \$4,666.50.

c. BRG: From January 1, 2026, through March 31, 2026, BRG billed a total of 36.6 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling \$13,887.00. *See Exhibit C.* These amounts include a voluntary write down of \$630.00.

d. Arizona Counsel: From January 1, 2026, through March 31, 2026, Arizona Counsel billed a total of 1.2 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling \$513.00. *See Exhibit D.*

11. The amounts requested reflect a total of \$5,296.50 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

12. The Receivership Estate has sufficient funds to pay all amounts requested. However, as set forth above, the Receiver and his professionals will not take any fees or be reimbursed for any expenses from the Receivership Estate until *after* the Receiver recovers at least three times the total amount of the fees requested in this and all previous fee applications.

V. SUMMARY OF EXHIBITS

13. Professional services have been recorded contemporaneously with services being rendered and these services, as well as the expenses incurred, are detailed in the attached Exhibits

described below.

14. The Receiver, Parr Brown, Arizona Counsel and BRG have maintained their time in records organized according to tasks, with each task record being maintained in chronological order.

15. The following Exhibits are attached hereto in support of this Fee Application:

Exhibit A—Time Records of Receiver

Exhibit A Summary by Task

16. This section of Exhibit A breaks down the total fees assessed for each of the Receiver's tasks, which are discussed in more detail below.

Exhibit A-1 Administration of Receivership Estate

17. The Receiver continued to communicate with the Utah Attorney General's Office to ensure they remain updated about the status of the Receivership Estate and the ongoing claims analysis process and recovery efforts. In addition, the Receiver reviewed certain tax and financial documents related to the administration of the Receivership Estate and assisted in the preparation and filing of the Estate's tax returns.

Exhibit A-2 Asset Analysis and Recovery

18. The Receiver worked closely with his legal counsel during the Application Period in negotiating favorable settlement agreements with net winners. These settlement efforts involved extensive coordination with the Receiver's counsel and required the Receiver to review the supporting documentation and settlement agreements before their execution. The Receiver also worked with his legal counsel in several litigation matters with Claw Back Defendants. The Receiver continued coordinating with investors and their counsel to substantiate various metal

transactions that were associated with such investors.

Exhibit A-5 Claims Administration

19. The Receiver and his team have completed the claims analysis process and are focused on resolving all remaining outstanding claims.

Exhibit B-Time Records of Parr Brown

Exhibit B Summary by Task

20. This section of Exhibit B breaks down the total fees assessed for each of Parr Brown's tasks, which are discussed in more detail below.

Exhibit B-1 Administration of Receivership Estate

21. During this Application Period, Parr Brown continued to manage and keep secure the property within the Receivership Estate. Parr Brown continued posting motions and Court orders on the Receiver's website and also providing updates to the Receiver's mailing matrix to ensure all interested parties received information about the Receivership's progress.

Exhibit B-2 Asset Analysis & Recovery

22. During the Application Period, Parr Brown continued to work the numerous claw back actions filed against scores of investors (the "Claw Back Defendants"). Parr Brown also continued working with the many potential net winners (the "Net Winners") with whom they executed tolling agreements in order to facilitate further discussions and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver's Motion for Settlement Authority (*See* Dkt. No. 271), and the Receiver's ongoing settlement efforts, this quarter the Receiver recovered \$526,000 settlement agreements. Parr Brown has worked closely with the Receiver to finalize agreements and negotiate with investors

and creditors to increase the number of settlement agreements.

Exhibit B-5 Claims Administration

24. Parr Brown previously submitted to the Court the Claims Registry packet, which identifies all claims and includes the Claimants' self-reported amount claimed, the allowed amount of the claim as determined by the Receiver, and—if applicable—an explanation of the Receiver's determination and objection to all or part of the claim. Only three unresolved claims remain which are either involved in claw back litigation or are stayed by the Court. Parr Brown continues to diligently resolve each unresolved claim while minimizing expenses to the Receivership Estate.

Exhibit C-Time Records of BRG

25. This section breaks down the total fees assessed by BRG, which are discussed in more detail below.

Recovery Litigation

26. BRG continued to be involved in assisting the Receiver in various ongoing litigation matters. BRG analyzed the activity and transactions, including supporting documents, for various investors for whom the Receiver has filed claw back actions. BRG met with counsel to discuss various issues associated with these matters. Pursuant to counsel requests, BRG reviewed and responded to emails and provided supporting documents and other information regarding these matters. BRG also prepared support, declarations, expert reports and exhibits in connection with litigation matters in which the Receiver is involved.

27. BRG continued to work with the Receiver and his counsel to analyze and review various litigation issues, including responses to interrogatories and financial information received from investors.

Tax Compliance and Analysis

28. BRG prepared, reviewed and filed federal and state payroll tax returns for Q4 2025 in connection with the distributions made related to the wage claims of former employees of Rust Rare Coin. BRG reviewed 2025 distributions of the receivership and prepared required Forms 1099 and submitted them to the proper taxing authorities. BRG also analyzed activity for the year ending 12/31/2025 and began preparation of supporting work papers to be used in the preparation of the 2025 income tax returns for the Receivership.

29. BRG reviewed, discussed and followed up with the Receiver regarding various tax issues and filing requirements.

Exhibit D-Time Records of Arizona Counsel

30. As a result of the Receiver's and his team's clawback efforts, the Receiver previously secured a judgment in favor of the Receivership Estate against net winners who own real property in the State of Arizona. The Receiver engaged Arizona Counsel to advise the Receiver and take the steps necessary under Arizona law to foreclose on the real property. Arizona Counsel previously initiated foreclosure proceedings which were stifled due to the filing of a bankruptcy by the net winners. Arizona Counsel is currently working with the Receiver and his team to have the bankruptcy dismissed so that the foreclosure proceedings can move forward.

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

31. The Receiver has previously filed twenty-eight interim fee applications,² all of which were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 368, 383, 414, 418, 429, 435, 443, 463, 482, 490, 495, 509, 517, 530, 534, 544, 554, 558, 564, 570, 574, 577 and 580. This is the Thirtieth Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

² The Receiver's First Interim Fee Application was filed on February 22, 2019. *See* Dkt. No. 120. The Receiver's Second Interim Fee Application was filed on May 24, 2019. *See* Dkt. No. 187. The Receiver's Third Interim Fee Application was filed on September 4, 2019. *See* Dkt. No. 241. The Receiver's Fourth Interim Fee Application was filed on December 31, 2019. *See* Dkt. No. 274. The Receiver's Fifth Interim Fee Application was filed on March 10, 2020. *See* Dkt. No. 292. The Receiver's Sixth Interim Fee Application was filed on August 7, 2020. *See* Dkt. No. 333. The Receiver's Seventh Interim Fee Application was filed on November 13, 2020. *See* Dkt. No. 367. The Receiver's Eighth Interim Fee Application was filed on January 15, 2021. *See* Dkt. No. 382. The Receiver's Ninth Interim Fee Application was filed on May 27, 2021. *See* Dkt. No. 413. The Receiver's Tenth Interim Fee Application was filed on July 6, 2021. *See* Dkt. No. 416. The Receiver's Eleventh Interim Fee Application was filed on October 5, 2021. *See* Dkt. No. 428. The Receiver's Twelfth Interim Fee Application was filed on December 13, 2021. *See* Dkt. No. 434. The Receiver's Thirteenth Interim Fee Application was filed on February 22, 2022. *See* Dkt. No. 442. The Receiver's Fourteenth Interim Fee Application was filed on June 14, 2022. *See* Dkt. No. 461. The Receiver's Fifteenth Interim Fee Application was filed on September 12, 2022. *See* Dkt. No. 481. The Receiver's Sixteenth Interim Fee Application was filed on December 14, 2022. *See* Dkt. No. 488. The Receiver's Seventeenth Interim Fee Application was filed on March 14, 2023. *See* Dkt. No. 494. The Receiver's Eighteenth Interim Fee Application was filed on June 12, 2023. *See* Dkt. No. 508. The Receiver's Nineteenth Interim Fee Application was filed on September 20, 2023. *See* Dkt. No. 516. The Receiver's Twentieth Interim Fee Application was filed on December 13, 2023. *See* Dkt. No. 528. The Receiver's Twenty-First Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 533. The Receiver's Twenty-Second Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 543. The Receiver's Twenty-Third Interim Fee Application was filed on September 11, 2024. *See* Dkt. No. 553. The Receiver's Twenty-Fourth Interim Fee Application was filed on December 16, 2024. *See* Dkt. No. 557. The Receiver's Twenty-Fifth Interim Fee Application was filed on March 21, 2025. *See* Dkt. No. 563. The Receiver's Twenty-Sixth Interim Fee Application was filed on June 23, 2025. *See* Dkt. No. 569. The Receiver's Twenty-Seventh Interim Fee Application was filed on September 22, 2025. *See* Dkt. No. 573. The Receiver's Twenty-Eighth Interim Fee Application was filed on December 18, 2025. *See* Dkt. No. 576. The Receiver's Twenty-Ninth Interim Fee Application was filed on March 16, 2026. *See* Dkt. No. 579.

41. For the reasons set forth above, and as supported by the Exhibits attached hereto, the Receiver respectfully submits that the fees and expenses requested herein are for actual services that were necessary for and beneficial to the administration of the Receivership Estate. The Receiver has made every attempt to limit the administrative expenses of the Receivership Estate, and the Receiver submits that given the work that has been performed as reflected in the attached time entries, the fees and expenses that have been incurred are reasonable.

42. Pursuant to Paragraph 62 of the Appointment Order, *see* Dkt. No. 54, the Receiver represents and avers that this Fee Application complies with the terms of the billing instructions agreed to by the Receiver, the fees and expenses included therein were incurred in the best interests of the Receivership Estate, and the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

43. The Receiver respectfully requests that the Court enter an Order (i) approving, on an interim basis, the Receiver's fees and expenses in the amount of \$11,880.00; Parr Brown's fees and expenses in the amount of \$55,013.47; BRG's fees and expenses in the amount of \$13,887.00; Arizona Counsel's fees and expenses in the amount of \$513.00, and (ii) authorizing the Receiver to pay these fees and reimburse the expenses from the Receivership Estate once the Receiver has recovered for the Estate at least three times the amount of fees requested in this Fee Application and prior applications.

44. A proposed Order is attached hereto as **Exhibit E**.

The Receiver, Parr Brown, Arizona Counsel and BRG verify under penalty of perjury that the foregoing is true and correct.

DATED this 22nd day of June 2026.

RECEIVER

By: /s/ Jonathan O. Hafen
Jonathan O. Hafen, Receiver

PARR BROWN GEE & LOVELESS, P.C.

By: /s/ Joseph M.R. Covey
Joseph M.R. Covey
Jeffery A. Balls
Walter O. Peterson
Attorneys for Receiver Jonathan O. Hafen

BERKELEY RESEARCH GROUP

By: /s/ Ray Stron*g
Ray Strong
**Electronically signed with permission*

SACKS TIERNEY P.A.

By: /s/ Michael Harris*
Michael Harris
**Electronically signed with permission*

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above **THIRTIETH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on June 22, 2026, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver’s website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver’s master mailing matrix.

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/s/ Lori J. Stumpf
Lori J. Stumpf

EXHIBIT A

EXHIBIT A

THIRTIETH INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

Rust Rare Coin Receiver

April 15, 2026

Invoice: 979213
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 6,600.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 6,600.00



PARR BROWN GEE & LOVELESS

Invoice: 979213
 Rust Rare Coin Receiver
 Administration

April 15, 2026
 Client: 177110
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/12/26	JOH	Email with tax team re tax returns; Review related documents; Follow up re completing settlement of clawback action	.60	330.00
1/19/26	JOH	Review tax documents; Follow up re logistics concerning tax return filing	.40	220.00
1/20/26	JOH	Final review of tax documents and related information	.20	110.00
1/23/26	JOH	Review multiple drafts of quarterly report; Email with legal counsel re same; Review related documents	.80	440.00
2/02/26	JOH	Email with legal counsel re receivership wind-up and potential meeting with the Court; Review status of remaining clawback action and related email correspondence and documents; Email with legal counsel re J. Rust residence and related communications with US Attorneys Office	2.10	1,155.00
2/04/26	JOH	Follow up with realtor re liquidation of property; Research relating to same	.80	440.00
2/09/26	JOH	Email with legal counsel re upcoming Court meeting; Research re status of clawback actions and potential sale of real property	1.10	605.00
2/11/26	JOH	Email with legal counsel re upcoming meeting with Court; Prepare for same	.80	440.00
2/16/26	JOH	Prepare for meeting with Court	.30	165.00
2/24/26	JOH	Prepare for and participate in meeting with legal counsel re status of all pending matters; Prepare for meeting with Judge Campbell	1.20	660.00
2/25/26	JOH	Prepare for and participate in meeting with Court re overall status of receivership and potential timelines for resolution	1.10	605.00
2/26/26	JOH	Review tax document; Follow up with tax and accounting team re same	.40	220.00
3/01/26	JOH	Email with realtor re sale of property; Research re same	.40	220.00
3/08/26	JOH	Follow up with legal counsel re sales process for Kingman, Arizona property	.10	55.00
3/23/26	JOH	Review correspondence relating to R Legacy Entertainment; Follow up re same; Review materials re Kingman, Arizona HOA and related matters	1.00	550.00
3/25/26	JOH	Attention to request for lien release; Review related communications; Email with legal counsel re same	.50	275.00
3/26/26	JOH	Email with legal counsel re lien release; Review related document and email correspondence from title company	.20	110.00

TOTAL PROFESSIONAL SERVICES \$ 6,600.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	550.00	12.00	6,600.00
TOTALS		12.00	\$ 6,600.00

PARR BROWN GEE & LOVELESS

Invoice: 979213
Rust Rare Coin Receiver
Administration

April 15, 2026
Client: 177110
Matter: 1

TOTAL THIS INVOICE

\$ 6,600.00

**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

April 15, 2026

Rust Rare Coin Receiver

Invoice: 979213
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE \$ 6,600.00

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

Wire Transfer Instructions

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

E-Check

Name of Bank: _____
Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

***3% fee for credit card transactions**

Please reference your invoice # 979213

Online Payments: <https://parrbrown.com/payment-portal>
Payments accepted by phone (801) 532-7840
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

Rust Rare Coin Receiver

April 15, 2026

Invoice: 980632
Client: 177110
Matter: 2

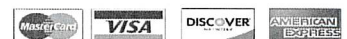
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 5,280.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 5,280.00



PARR BROWN GEE & LOVELESS

Invoice: 980632
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

April 15, 2026
 Client: 177110
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/02/26	JOH	Review email correspondence from counsel re potential settlements; Review related documents; Follow up re potential settlement strategy	1.10	605.00
1/04/26	JOH	Review email correspondence from opposing counsel re clawback action; Review related document	.40	220.00
1/05/26	JOH	Further attention to three clawback actions; Email with legal counsel re same; Review background information and documents re clawback action; Follow up with legal counsel re same	1.30	715.00
1/07/26	JOH	Review email correspondence and related materials re clawback settlement; Review loan payoff request related to additional clawback action; Follow up re same; Review documents and email correspondence re vacating certain judgments; Analyze settlement options in group of clawback actions	1.40	770.00
1/11/26	JOH	Review email correspondence re clawback settlement payment; Research re underlying settlement; Email with legal counsel re same	.60	330.00
1/13/26	JOH	Email with legal counsel re clawback settlement and related issues; Email and meeting with legal counsel re staffing matters; Email with title company re clawback action; Review related document and email correspondence	.80	440.00
1/14/26	JOH	Attention to potential resolution of clawback action; Review related email correspondence	.40	220.00
1/21/26	JOH	Review information re settlement payment; Email with legal counsel re same	.20	110.00
3/02/26	JOH	Attention to potential resolution of clawback action; Review related information; Follow up with legal counsel re same; Follow up re tax issue	.80	440.00
3/05/26	JOH	Attention to potential resolution of clawback action; Follow up with legal counsel re same; Review related email correspondence	.60	330.00
3/06/26	JOH	Email with legal counsel re clawback action	.10	55.00
3/12/26	JOH	Review email correspondence and related materials re summary judgment ruling in clawback action; Follow up with legal counsel re same	.50	275.00
3/19/26	JOH	Analyze potential resolution of clawback action; Email with legal counsel re same; Attention to tax issue; Review information from title company re Kingman property	1.40	770.00

TOTAL PROFESSIONAL SERVICES \$ 5,280.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	550.00	9.60	5,280.00
TOTALS		9.60	\$ 5,280.00

PARR BROWN GEE & LOVELESS

Invoice: 980632
Rust Rare Coin Receiver
Asset Analysis & Recovery

April 15, 2026
Client: 177110
Matter: 2

TOTAL THIS INVOICE

\$ 5,280.00

**PARR BROWN
& LOVELESS**
ATTORNEYS AT LAW

April 15, 2026

Rust Rare Coin Receiver

Invoice: 980632
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 5,280.00

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

Wire Transfer Instructions

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

E-Check

Name of Bank: _____
Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

***3% fee for credit card transactions**

Please reference your invoice # 980632

Online Payments: <https://parrbrown.com/payment-portal>
Payments accepted by phone (801) 532-7840
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



EXHIBIT B

EXHIBIT B

THIRTIETH INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B

**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

Rust Rare Coin Receivership

April 15, 2026

Invoice: 979209
Client: 176430
Matter: 1

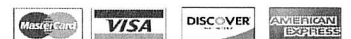
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 7,914.00
Total Costs Advanced	<u>\$ 79.75</u>
TOTAL THIS INVOICE	\$ 7,993.75



PARR BROWN GEE & LOVELESS

Invoice: 979209
Rust Rare Coin Receivership
Administration of Receivership Estate

April 15, 2026
Client: 176430
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/06/26	JMC	Correspond with Jeff Balls re sale of judgments in Rust; Correspond with Jeff Balls re Howell OSC	.20	103.00
1/07/26	JMC	Correspond with Jeff Balls and Jon Hafen re remaining cases and related issues	.50	257.50
1/07/26	JAB	No Charge - Review attorney fees; Conference with Joseph Covey and Jonathan Hafen	.80	N/C
1/08/26	JMC	No Charge - Correspond with Jeff Balls re fee application and related issues	.20	N/C
1/10/26	WOP	No Charge - Review attorney time sheets for quarterly report; Continue draft of the same	2.60	N/C
1/12/26	JMC	No Charge - Correspond with Jeff Balls and Lori Stumpf re approval of fee application	.20	N/C
1/14/26	JAB	No Charge - Conference with Walter Peterson re attorney fees; Review order granting fee application; Review payment analysis	1.10	N/C
1/14/26	WOP	Office conference with Jeff Balls re quarterly report; Review attorney time sheets re same	.40	146.00
1/15/26	JAB	No Charge - Review attorney fees; Correspond with Jenny Buelt	.50	N/C
1/15/26	WOP	Email correspondence with Jenny Buelt re ledger for quarterly report; Review ledger; Further correspondence with Jenny re changes to ledger; Review the same	.80	292.00
1/20/26	JMC	Correspond with Jeff Balls re Josh Rust home	.20	103.00
1/23/26	JMC	Review quarterly report; Correspond with Jeff Balls re report and liquidation of remaining assets	.70	360.50
1/23/26	WOP	Correspond with Jeff Balls re quarterly report; Complete draft of the same; Create exhibits; Confirm settlement payment amounts; Review and redact attorney time sheets; Correspond with accounting re same	3.90	1,423.50
1/28/26	JMC	Review and analyze Josh Rust home issues; Correspond with Jeff Balls and US DOJ re the same; Draft correspondence to government re disposition of Josh Rust's home	2.30	1,184.50
2/02/26	JMC	Correspond with Jeff Balls and Jon Hafen re sale of Josh Rust home and liquidation of Josh Rust personal property	1.90	978.50
2/11/26	JMC	Correspond with Jeff Balls re final hearing preparation	.10	51.50
2/17/26	JMC	Correspond with Jeff Balls re update meeting with the receiver	.10	51.50
2/24/26	JMC	Correspond with Jeff Balls and Jon Hafen re upcoming hearing and status of case	1.00	515.00
2/25/26	JMC	Correspond with Jeff Balls re status meeting with judge and staffing going forward	.30	154.50
2/26/26	JMC	Review tax document	.10	51.50
3/05/26	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
3/09/26	JMC	No Charge - Review fee application	.10	N/C
3/09/26	JAB	No Charge - Review attorney fee application	.40	N/C

PARR BROWN GEE & LOVELESS

Invoice: 979209
 Rust Rare Coin Receivership
 Administration of Receivership Estate

April 15, 2026
 Client: 176430
 Matter: 1

Date	Tkpr	Description	Hours	Amount
3/09/26	WOP	No Charge - Continue draft of fee application; Create exhibits; Email correspondence with Jeff Balls re same	2.80	N/C
3/11/26	JAB	No Charge - Revise motion for attorney fees	.90	N/C
3/12/26	JMC	No Charge - Review and revise twenty-ninth fee application; Correspond with Jeff Balls and the government re the same	.10	N/C
3/12/26	JAB	No Charge - Correspond with Joseph Covey	.30	N/C
3/16/26	JMC	No Charge - Correspond with Jeff Balls and government re fee application	.20	N/C
3/16/26	JAB	No Charge - Review correspondence from Jennifer Korb and Anthony Biagioli; Correspond with Joseph Covey; Finalize fee application	.60	N/C
3/17/26	JMC	No Charge - Correspond with Jeff Balls re fee application approval	.10	N/C
3/17/26	JAB	No Charge - Review order granting fee application; Coordinate re same	.30	N/C
3/23/26	WOP	Review docket history; Review prior quarterly reports in preparation for thirtieth quarterly report; Begin draft of same	3.70	1,350.50
3/25/26	JMC	Review Andreini balloon mortgage document	.10	51.50
3/25/26	WOP	Continue draft of quarterly report	2.30	839.50

TOTAL PROFESSIONAL SERVICES \$ 7,914.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	515.00	7.50	3,862.50
Walter O Peterson	365.00	11.10	4,051.50
TOTALS		18.60	\$ 7,914.00

COSTS ADVANCED

Date	Description	Amount
1/22/26	Grasshopper - monthly service	19.57
2/23/26	Grasshopper - monthly service	19.57
3/18/26	SimpleCertifiedMail	21.04
3/23/26	Grasshopper - monthly service	19.57

TOTAL COSTS ADVANCED \$ 79.75

TOTAL THIS INVOICE \$ 7,993.75

**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

April 15, 2026

Rust Rare Coin Receivership

Invoice: 979209
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE

\$ 7,993.75

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

Wire Transfer Instructions

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

E-Check

Name of Bank: _____
Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

***3% fee for credit card transactions**

Please reference your invoice # 979209

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Payments accepted by phone (801) 532-7840
Payable Upon Receipt

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**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

Rust Rare Coin Receivership

April 15, 2026

Invoice: 979210
Client: 176430
Matter: 2

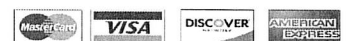
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 44,962.00
Total Costs Advanced	<u>\$ 633.72</u>
TOTAL THIS INVOICE	\$ 45,595.72



PARR BROWN GEE & LOVELESS

Invoice: 979210
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

April 15, 2026
 Client: 176430
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/05/26	JAB	Review documents for litigation against AG Tsunami; Correspond with Jonathan Hafen and Tom Melton re same	.90	400.50
1/06/26	JAB	Correspond with Dominic Shaw; Review Lugli documents; Draft discovery responses to Lugli	2.50	1,112.50
1/07/26	JMC	Correspond with Jeff Balls re Arizona sale of property and title insurance and related issues	.30	154.50
1/07/26	JAB	Correspond with Matt Boley; Draft stipulated dismissal; Correspond with Ryan Pahnke; Correspond with James Samuelson; Correspond with Dominic Shaw; Correspond with Nicole Nijdl re title insurance and closing; Telephone conference with Lori Henry; Review litigation status; Review settlement payments; Telephone conference with Nathan Freeman re status; Draft motion to vacate judgment and proposed order; Review documents for Lugli; Draft motion to approve settlement	3.60	1,602.00
1/07/26	LH	Upload Lugli's initial disclosures documents and Rust Rare Coin initial disclosures documents to Everlaw; Communicate with Jeff Balls re same; Email Shane at Salt Lake Premier re closing out database; Meeting with Crista Yancey re same; Telephone conference with Shane at Salt Lake Premier re closing database and next steps	1.00	250.00
1/08/26	JAB	Review information re document production; Conference with Lori Henry; Telephone conference with Dominic Shaw; Conference with Rodger Burge; Correspond with Joseph Covey re judgments	3.40	1,513.00
1/08/26	LH	Discussions with Samantha Combs re issues with Lugli's document production; Meeting with Jeff Balls re same; Upload native emails provided in NVP production	.80	200.00
1/13/26	JAB	Correspond with Jonathan Hafen; Draft motion to approve settlement agreement; Correspond with title company re payoff for Andreini settlement	.80	356.00
1/14/26	JAB	Correspond with Kim Maenza re settlement payment; Correspond with Dominic Shaw re financial hardship; Call Jeff Shaw; Draft facts for Lugli	.80	356.00
1/15/26	JAB	Review Lugli documents; Telephone conference with Jeff Shaw	4.10	1,824.50
1/16/26	JAB	Review Lugli documents	3.20	1,424.00
1/19/26	JAB	Review Lugli documents; Draft statement of undisputed facts; Correspond with Jeff Shaw	4.40	1,958.00
1/20/26	JAB	Draft stipulated facts; Correspond with Jeff Shaw	1.50	667.50
1/21/26	JAB	Review recovered money; Conference with Jenny Buelt; Correspond with Jason Bouzos; Conference with Jeff Shaw; Review Lugli documents; Draft motion for summary judgment	3.90	1,735.50
1/22/26	JAB	Review documents	.40	178.00
1/23/26	JAB	Revise quarterly report; Correspond with Jonathan Hafen re same; Review bank receipts; Draft motion to approve settlement agreement; Telephone conference with Ryan Pahnke	1.20	534.00
1/27/26	JMC	Review order approving Andreini settlement	.10	51.50

PARR BROWN GEE & LOVELESS

Invoice: 979210
Rust Rare Coin Receivership
Asset Analysis & Recovery

April 15, 2026
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
1/27/26	JAB	Review court order; Review correspondence from court clerk; Draft satisfaction of judgment; Correspond with Nate Freeman; Correspond with David Miller re status of case; Draft status report; Finalize quarterly report	1.30	578.50
1/28/26	JAB	Conference with Joseph Covey; Correspond with Lori Stumpf; Review coin inventory; Correspond with C. Heninger	2.50	1,112.50
1/29/26	JAB	Review documents for settlements	.20	89.00
1/30/26	JAB	Review correspondence from court clerk; Review documents from Jeff Shaw	.30	133.50
2/02/26	JAB	Correspond with Jonathan Hafen re meeting with Judge Campbell; Correspond with N. Freeman; Conference with Joseph Covey; Correspond with Matt Boley; Call Ryan Pahnke; Complete sale terms; Review discovery responses; Correspond with Tom Melton re status of case	1.50	667.50
2/03/26	JAB	Telephone conference with Ryan Pahnke	.30	133.50
2/04/26	JAB	Call Ryan Pahnke; Call Matt Boley; Correspond with Jeff Shaw re settlement agreements; Correspond with Natalie Hafen	.80	356.00
2/09/26	JAB	Correspond with Jeff Shaw; Revise motion for summary judgment; Review declaration of Jeff Shaw; Correspond with Jonathan Hafen re meeting with court; Correspond with Nathan Freeman re meeting with Court; Telephone conference with Matt Boley	1.90	845.50
2/10/26	JAB	Call Ryan Pahnke; Draft summary judgment motion	2.40	1,068.00
2/11/26	JAB	Draft motion for summary judgment; Correspond with Nate Freeman; Correspond with Jonathan Hafen re meeting with court; Draft stipulated facts	3.70	1,646.50
2/11/26	CMM	Communicate with artist who wants to buy back musical rights; Communicate with Jeff Balls re the same and current status of said request	.40	142.00
2/12/26	JAB	Conference with Ash McMurray re sale of music rights; Call Ryan Pahnke; Review records of Rust Rare Coin; Review declaration of Jeff Shaw; Finalize motion for summary judgment	1.80	801.00
2/13/26	JAB	Finalize motion for summary judgment; Review exhibits; Telephone conference with Ryan Pahnke	.80	356.00
2/16/26	JMC	Review Sargent motion for summary judgment	.10	51.50
2/16/26	JAB	Correspond with Jonathan Hafen re meeting; Draft discovery requests	.70	311.50
2/17/26	JAB	Draft discovery requests; Review documents produced by defendants; Telephone conference with Jeff Shaw	4.00	1,780.00
2/18/26	JAB	Draft discovery requests; Review hard drives; Correspond with Ryan Pahnke; Review discovery requests; Correspond with Dominic Shaw; Correspond with Jeff Shaw	5.40	2,403.00
2/19/26	JAB	Correspond with Tom Melton	2.30	1,023.50
2/20/26	JAB	Correspond with Jeff Shaw; Review status of case in preparation for meeting with Judge Campbell	1.10	489.50

PARR BROWN GEE & LOVELESS

Invoice: 979210
Rust Rare Coin Receivership
Asset Analysis & Recovery

April 15, 2026
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
2/23/26	JAB	Review status of case; Draft motion for supplemental proceeding; Call Matt Boley; Email Matt Boley	1.60	712.00
2/24/26	JAB	Prepare for conference with Judge Campbell; Telephone conference with Matt Boley and Gretchen Howell; Conference with Jonathan Hafen and Joseph Covey; Review correspondence to title office; Telephone conference with Dominic Shaw; Telephone conference with Dominic Shaw; Revise deeds for sale of Howell property	4.20	1,869.00
2/25/26	JAB	Prepare for meeting with Judge Campbell; Telephone conference with Jeff Shaw; Conference with Judge Campbell; Conference with Jonathan Hafen; Conference with Joseph Covey	3.40	1,513.00
2/26/26	JAB	Review case status; Telephone conference with Jeff Shaw	2.10	934.50
2/27/26	JAB	Review pleadings	.30	133.50
3/02/26	JAB	Draft motion for summary judgment; Telephone conference with Ryan Pahnke re settlement; Correspond with Jonathan Hafen re settlement; Draft settlement agreement	1.50	667.50
3/03/26	JAB	Draft motion for summary judgment	.40	178.00
3/05/26	JMC	Correspond with Jeff Balls and Jon Hafen re settlement involving the Sargents and Chards	.20	103.00
3/05/26	JAB	Telephone conference with Joseph Covey; Telephone conference with Ryan Pahnke; Correspond with Jonathan Hafen	.50	222.50
3/09/26	JAB	Review hardship form; Review discovery	.60	267.00
3/11/26	JMC	Correspond with counsel for the Darren Nelson trustee re the case; Correspond with Jeff Balls re the same	.40	206.00
3/11/26	JAB	Conference with Joseph Covey re bankruptcy status of defendant	.50	222.50
3/12/26	JMC	Review order on Guyon; Correspond with Jeff Balls re the same	.40	206.00
3/12/26	JAB	Correspond with Ryan Pahnke; Correspond with J. Samuelson; Telephone conference with Ryan Pahnke; Review order granting motion for summary judgment against Guyon	2.20	979.00
3/13/26	JAB	Review motion to extension; Correspond with Ryan Pahnke re same	.10	44.50
3/16/26	JAB	Review correspondence from Dominic Shaw	.90	400.50
3/17/26	JAB	Review documents; Draft discovery responses; Correspond with Dominic Shaw	1.30	578.50
3/18/26	JAB	Draft discovery responses; Telephone conference with Ryan Pahnke	.50	222.50
3/19/26	JMC	Correspond with Jeff Balls re Chard settlement	.10	51.50
3/19/26	JAB	Correspond with Jonathan Hafen re settlement; Correspond with Ryan Pahnke re judgments obtained	1.60	712.00
3/23/26	JAB	Draft discovery responses	1.90	845.50
3/24/26	JAB	Draft discovery responses; Telephone conference with Ryan Pahnke; Draft settlement agreement; Draft confession of judgment	2.50	1,112.50
3/25/26	JAB	Draft settlement agreement and confession of judgment; Draft discovery responses; Correspond with Tammy Wooten re release of trust deed	4.20	1,869.00

PARR BROWN GEE & LOVELESS

Invoice: 979210
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

April 15, 2026
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
3/26/26	JAB	Revise satisfaction of mortgage; Draft discovery responses; Telephone conference with Dominic Shaw; Telephone conference with Crista Yancy; Telephone conference with Jeff Shaw	2.70	1,201.50
3/27/26	JAB	Finalize discovery responses; Draft motions to extend discovery; Correspond with Ryan Pahnke; Correspond with Dominic Shaw; Review proposed motion to extend time to respond to motion for summary judgment	3.10	1,379.50
3/30/26	LH	Email Jeff Balls re claimant address for distribution	.10	25.00
TOTAL PROFESSIONAL SERVICES				\$ 44,962.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	515.00	1.60	824.00
Jeffery A Balls	445.00	97.80	43,521.00
Claire M McGuire	355.00	.40	142.00
Lori Henry - Paralegal	250.00	1.90	475.00
TOTALS		101.70	\$ 44,962.00

COSTS ADVANCED

Date	Description	Amount
1/14/26	US District Court - certified copy	12.50
1/21/26	SimpleCertified Mail	15.12
1/28/26	PACER - electronic court records	1.50
1/31/26	Sandline - eDiscovery	566.00
2/28/26	Sandline - eDiscovery	16.00
3/16/26	PACER - electronic court records	5.50
3/27/26	PACER - electronic court records	1.10
3/31/26	Sandline - eDiscovery	16.00
TOTAL COSTS ADVANCED		\$ 633.72
TOTAL THIS INVOICE		\$ 45,595.72

**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

April 15, 2026

Rust Rare Coin Receivership

Invoice: 979210
Client: 176430
Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 45,595.72

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

Wire Transfer Instructions

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

E-Check

Name of Bank: _____
Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

***3% fee for credit card transactions**

Please reference your invoice # 979210

Online Payments: <https://parrbrown.com/payment-portal>
Payments accepted by phone (801) 532-7840
Payable Upon Receipt

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**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

Rust Rare Coin Receivership

April 15, 2026

Invoice: 979211
Client: 176430
Matter: 5

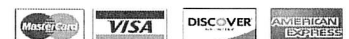
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 1,424.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,424.00



PARR BROWN GEE & LOVELESS

Invoice: 979211
 Rust Rare Coin Receivership
 Claims Administration

April 15, 2026
 Client: 176430
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/06/26	JAB	Correspond with claimants	.20	89.00
1/14/26	JAB	Correspond with claimant re status of case; Review bank information	1.60	712.00
1/21/26	JAB	Correspond with claimant	.50	222.50
2/02/26	JAB	Correspond with claimant re status	.20	89.00
3/19/26	JAB	Correspond with claimants re distributions	.70	311.50
TOTAL PROFESSIONAL SERVICES				\$ 1,424.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	445.00	3.20	1,424.00
TOTALS		3.20	\$ 1,424.00

TOTAL THIS INVOICE \$ 1,424.00

**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

April 15, 2026

Rust Rare Coin Receivership

Invoice: 979211
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE \$ 1,424.00

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

Wire Transfer Instructions

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

E-Check

Name of Bank: _____
Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

***3% fee for credit card transactions**

Please reference your invoice # 979211

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Payments accepted by phone (801) 532-7840
Payable Upon Receipt

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EXHIBIT C

EXHIBIT C

THIRTIETH INTERIM FEE APPLICATION

Time Records of BRG

EXHIBIT C



INVOICE

Jonathan O. Hafen
Parr Brown Gee & Loveless
101 South 200 East, Suite 700
Salt Lake City, UT 84111

June 8, 2026
Client-Project: 016222-025457
Invoice #: 10047519
Tax ID: 27-1451273

Via Email: jhafen@parrbrown.com

RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Services Rendered From January 1, 2026 Through March 31, 2026

Professional Services	\$	14,517.00	USD
Voluntary Reduction		(630.00)	
CURRENT CHARGES	\$	13,887.00	USD

PAYMENT IS DUE BY July 8, 2026

Please direct questions regarding this invoice to: Jeffrey Shaw at JShaw@thinkbrg.com.

Please remit EFT (Electronic Funds Transfer) payment to:

Bank Name: PNC BANK, N.A.
SWIFT: PNCCUS33
ABA #: 031207607
Account Name: Berkeley Research Group LLC
Account #: 8026286672
Reference: 10047519

Please remit check payment to:

BERKELEY RESEARCH GROUP LLC
PO BOX 676158
DALLAS, TX 75267-6158

Please remit express/overnight payment to:

PNC BANK C/O BERKELEY RESEARCH GROUP LLC
LOCKBOX NUMBER 676158
1200 E CAMPBELL RD, STE 108
RICHARDSON, TX 75081

Please send remittance advice details to remitadvice@thinkbrg.com



INVOICE

Page 2 of 5

Invoice # 10047519

Client-Project: 016222-025457

RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Services Rendered From January 1, 2026 Through March 31, 2026

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Ray Strong	455.00	0.70	318.50
Associate Director			
Leif Larsen	425.00	7.90	3,357.50
Jeffrey Shaw	420.00	23.20	9,744.00
Jeffrey Shaw	0.00	1.50	N/C
Case Assistant			
Kellee Calder	165.00	0.20	33.00
Ava McConkie	140.00	3.10	434.00
Professional Services		36.60	13,887.00



INVOICE

Page 3 of 5

Invoice # 10047519

Client-Project: 016222-025457

RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Services Rendered From January 1, 2026 Through March 31, 2026

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
500	Recovery Litigation	22.80	9,600.50
600	Tax Compliance & Analysis	9.70	3,837.00
610	Income Tax Preparation	2.60	449.50
950	Fee Application Preparation & Hearing	1.50	N/C
Professional Services		36.60	13,887.00



INVOICE

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Invoice # 10047519

Client-Project: 016222-025457

RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Services Rendered From January 1, 2026 Through March 31, 2026

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
01/06/26	Jeffrey Shaw	Reviewed and updated declaration narrative.	0.80	420.00	336.00
01/15/26	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.60	420.00	252.00
01/16/26	Jeffrey Shaw	Prepared schedules and email to counsel regarding Lugli activity.	0.60	420.00	252.00
01/20/26	Jeffrey Shaw	Emails regarding litigation issues.	0.50	420.00	210.00
01/30/26	Jeffrey Shaw	Reviewed Lugli activity and schedules and prepared email to counsel regarding the same.	0.50	420.00	210.00
02/02/26	Jeffrey Shaw	Prepared declaration exhibits.	1.50	420.00	630.00
02/02/26	Jeffrey Shaw	Revised declaration narrative.	0.80	420.00	336.00
02/02/26	Jeffrey Shaw	Analyzed Chard transaction support and detail.	1.30	420.00	546.00
02/06/26	Jeffrey Shaw	Reviewed Chard investment activity and email regarding declaration.	0.50	420.00	210.00
02/10/26	Jeffrey Shaw	Discussions regarding Chard declaration.	0.50	420.00	210.00
02/10/26	Ray Strong	Reviewed Chard declaration and analyses.	0.50	455.00	227.50
02/12/26	Jeffrey Shaw	Reviewed, finalized and submitted declaration.	1.30	420.00	546.00
02/12/26	Jeffrey Shaw	Reviewed, updated and prepared Chard declaration / exhibits.	2.50	420.00	1,050.00
02/17/26	Jeffrey Shaw	Reviewed, prepared and submitted files to counsel per request.	0.50	420.00	210.00
02/17/26	Jeffrey Shaw	Call with counsel to discuss litigation issues.	0.50	420.00	210.00
02/18/26	Ray Strong	Analyzed status of remaining recovery litigation.	0.20	455.00	91.00
02/20/26	Jeffrey Shaw	Analyzed Wade disbursements pursuant to counsel inquiry.	2.10	420.00	882.00
02/24/26	Jeffrey Shaw	Followed-up with counsel regarding litigation issues.	0.30	420.00	126.00
02/25/26	Jeffrey Shaw	Analyzed Guyon transactions and responded to counsel inquiry.	0.90	420.00	378.00
02/26/26	Jeffrey Shaw	Analyzed recent claw back settlements and updated summary schedule.	0.70	420.00	294.00
02/26/26	Jeffrey Shaw	Call with counsel to discuss litigation issues.	0.80	420.00	336.00
02/26/26	Jeffrey Shaw	Analyzed Wade transactions in preparation for call with counsel.	0.50	420.00	210.00
02/27/26	Jeffrey Shaw	Analyzed recent claw back settlements and updated summary schedule.	0.90	420.00	378.00
03/26/26	Jeffrey Shaw	Call with counsel regarding Lugli litigation.	0.70	420.00	294.00
03/26/26	Jeffrey Shaw	Reviewed response to interrogatories for Lugli litigation.	1.00	420.00	420.00
03/27/26	Jeffrey Shaw	Reviewed Lugli financial documents.	0.50	420.00	210.00
03/27/26	Jeffrey Shaw	Reviewed Guyon Summary Judgment ruling.	1.10	420.00	462.00
03/27/26	Jeffrey Shaw	Call with counsel regarding Lugli activity.	0.20	420.00	84.00
Total for Task Code 500			22.80		9,600.50
Task Code: 600 - Tax Compliance & Analysis					
01/06/26	Leif Larsen	Prepared 2025 annual federal payroll returns.	1.50	425.00	637.50
01/06/26	Leif Larsen	Prepared 2025 annual state payroll returns.	1.10	425.00	467.50



INVOICE

Page 5 of 5

Invoice # 10047519

Client-Project: 016222-025457

RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/06/26	Leif Larsen	Prepared 4th quarter 2025 state payroll returns.	1.40	425.00	595.00
01/06/26	Leif Larsen	Prepared 4th quarter 2025 federal payroll returns.	1.70	425.00	722.50
01/12/26	Jeffrey Shaw	Prepared email regarding tax filings.	0.30	420.00	126.00
01/12/26	Jeffrey Shaw	Review and emails regarding tax issues.	0.60	420.00	252.00
01/21/26	Kellee Calder	Prepared tax returns for the Trustee's review and required signatures for 940 and 941 2025.	0.10	165.00	16.50
01/23/26	Ava McConkie	Analyzed 2025 financial transactions for 1099 forms.	0.50	140.00	70.00
01/23/26	Leif Larsen	Reviewed 2025 1099s for completeness and accuracy.	0.90	425.00	382.50
01/26/26	Ava McConkie	Prepared 1099 forms.	0.30	140.00	42.00
01/29/26	Kellee Calder	Assembled and sent out 2025 1099s.	0.10	165.00	16.50
02/02/26	Leif Larsen	Cleared diagnostics and submitted the 2025 information returns to the proper taxing authorities.	0.50	425.00	212.50
03/12/26	Leif Larsen	Prepared 2025 Form 7004 and submitted to the proper taxing authorities.	0.50	425.00	212.50
03/24/26	Jeffrey Shaw	Reviewed tax issues and filings.	0.20	420.00	84.00
Total for Task Code 600			9.70		3,837.00
Task Code: 610 - Income Tax Preparation					
02/04/26	Ava McConkie	Analyzed financial activity for the bankruptcy estate / prepared supporting work papers in preparation of tax returns.	1.80	140.00	252.00
02/05/26	Ava McConkie	Continued preparing supporting work papers in preparation of 2025 tax returns.	0.50	140.00	70.00
03/30/26	Leif Larsen	Followed up on information needed for the preparation of the 2025 income tax returns.	0.30	425.00	127.50
Total for Task Code 610			2.60		449.50
Task Code: 950 - Fee Application Preparation & Hearing					
03/02/26	Jeffrey Shaw	[NC] Prepared fee application narrative.	0.70	0.00	N/C
03/02/26	Jeffrey Shaw	[NC] Reviewed time entries and descriptions for Oct-Dec 2025.	0.80	0.00	N/C
Total for Task Code 950			1.50		0.00
Professional Services			36.60		13,887.00

EXHIBIT D

EXHIBIT D

THIRTIETH INTERIM FEE APPLICATION

Time Records of Arizona Counsel

EXHIBIT D

SacksTierney P.A.

ATTORNEYS

4250 North Drinkwater Boulevard | Fourth Floor | Scottsdale, Arizona 85251-3693 | 480.425.2600 | Fax 480.970.4610 | www.sackstierney.com

Parr Brown Gee & Loveless
 101 South 200 East Ste. 700
 Salt Lake City, UT 84111

Attention: Jeff Balls

February 06, 2026
 Client: PA123
 Matter: 00008
 Invoice #: 1322617

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through January 31, 2026

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
01/05/2026	JSS	Review and email to J. Balls re: settlement.	0.30	\$425.00	\$127.50
01/07/2026	JSS	Email from J. Balls; review and email to Balls with suggested Mohave County title company.	0.70	\$425.00	\$297.50
Total Professional Services			1.00		\$425.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	1.00	\$425.00	\$425.00
Total Services			\$425.00	
Total Current Charges				\$425.00
Previous Balance				\$1,105.00
<i>Less Payments</i>				(\$297.50)
PAY THIS AMOUNT				\$1,232.50

**ADDITIONAL COSTS MAY BE BILLED AT A LATER DATE
 PAYABLE UPON RECEIPT
 THE FIRM RESERVES THE RIGHT TO CHARGE INTEREST
 AT A RATE OF TEN PERCENT PER ANNUM ON ACCOUNTS 30 DAYS IN ARREARS**

SacksTierney P.A.

ATTORNEYS

4250 North Drinkwater Boulevard | Fourth Floor | Scottsdale, Arizona 85251-3693 | 480.425.2600 | Fax 480.970.4610 | www.sackstierney.com

Parr Brown Gee & Loveless
 101 South 200 East Ste. 700
 Salt Lake City, UT 84111

Attention: Jeff Balls

April 09, 2026
 Client: PA123
 Matter: 00008
 Invoice #: 1324106

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through March 31, 2026

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
03/11/2026	JSS	Follow up email to J. Balls re: settlement and sale.	0.20	\$440.00	\$88.00
Total Professional Services			0.20		\$88.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	0.20	\$440.00	\$88.00
Total Services			\$88.00	
Total Current Charges				\$88.00
Previous Balance				\$1,232.50
<i>Less Payments</i>				(\$722.50)
PAY THIS AMOUNT				\$598.00

**ADDITIONAL COSTS MAY BE BILLED AT A LATER DATE
 PAYABLE UPON RECEIPT**

**THE FIRM RESERVES THE RIGHT TO CHARGE INTEREST
 AT A RATE OF TEN PERCENT PER ANNUM ON ACCOUNTS 30 DAYS IN ARREARS**

EXHIBIT E

EXHIBIT E

THIRTIETH INTERIM FEE

APPLICATION

Proposed Order

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

COMMODITY FUTURES TRADING
COMMISSION, and

STATE OF UTAH DIVISION OF
SECURITIES, through Attorney General
Sean D. Reyes

Plaintiffs,

vs.

RUST RARE COIN INC., a Utah corporation,
GAYLEN DEAN RUST, an individual,
DENISE GUNDERSON RUST, an individual,
JOSHUA DANIEL RUST, an individual,

Defendants;

and

ALEESHA RUST FRANKLIN, an individual,
R LEGACY RACING INC, a Utah
corporation, R LEGACY ENTERTAINMENT
LLC, a Utah limited liability company, and R
LEGACY INVESTMENTS LLC, a Utah
limited liability company.

Relief Defendants.

**ORDER GRANTING THIRTIETH
INTERIM FEE APPLICATION**

Civil No. 2:18-cv-00892-TC

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the thirtieth interim fee application (the “Fee Application”), submitted by Jonathan O. Hafen in his capacity as the Court-Appointed Receiver for Rust Rare Coin Inc., Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, and Joshua Daniel Rust (collectively, “Defendants”) seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel,

Parr Brown Gee & Loveless (“Parr Brown”), Sacks Tierney P.A. (“Arizona Counsel”), and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of January 1, 2026, through March 31, 2025 (the “Application Period”), and authorization to pay all allowed fees and expenses from funds of the Receivership Estate.

Based on the Fee Application and accompanying exhibits, and for good cause shown,

IT IS HEREBY ORDERED that:

1. The Fee Application is GRANTED; and
2. The Receiver is hereby authorized to pay the fees and expenses incurred by the

Receiver, Parr Brown, BRG and Arizona Counsel, as follows:

- a. Receiver: \$11,880.00 for fees and expenses.
- b. Parr Brown: \$55,013.47 for fees and expenses.
- c. BRG: \$13,887.00 for fees and expenses.
- d. Arizona Counsel: \$513.00 for fees and expenses.

3. The Receiver and his professionals will not take any fees or be reimbursed for any expenses from the Receivership Estate until after the Receiver recovers at least three times the amount of the fees for the Estate, at which time the approved fees and expenses shall be paid.

DATED this ____ day of June, 2026.

Honorable Dustin B. Pead
United States Magistrate Judge