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Attorney For
Court-Appointed Receiver Michael Essary

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
03/11/2019 at 04:43:00 PM
Clerk of the Superior Court
By Lee McAlister, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

SALAM RAZUKI, an individual,
Plaintiff,

v.

NINUS MALAN, an individual; CHRIS
HAKIM, an individual; MONARCH
MANAGEMENT CONSULTING, INC. a
California corporation; SAN DIEGO UNITED
HOLDING GROUP, LLC, a California limited
liability company; FLIP MANAGEMENT,
LLC, a California limited liability company;
MIRA ESTE PROPERTIES, LLC, a California
limited liability company; ROSELLE
PROPERTIES, LLC, a California limited
liability company; BALBOA AVE
COOPERATIVE, a California nonprofit mutual
benefit corporation; CALIFORNIA CANNABIS
GROUP, a California nonprofit mutual benefit
corporation; DEVILISH DELIGHTS, INC., a
California nonprofit mutual benefit corporation;
and DOES 1-100, inclusive,

Defendants.

CASE NO.: 37-2018-00034229-CU-BC-CTL

**RECEIVER MICHAEL ESSARY'S
DECLARATION IN RESPONSE TO
DEFENDANT HAKIM'S EX PARTE
APPLICATION REGARDING MIRA ESTE**

Judge: Hon. Eddie C. Sturgeon
Dept: C-67
Date: February 21, 2019
Time: 8:30 a.m.

DECLARATION OF RECEIVER MICHAEL ESSARY

1. I, Michael Essary, was appointed as the Receiver in the above-entitled matter by this
Court on August 20, 2018. This declaration is submitted in response to Defendant Hakim's *ex parte*

1 application, which I received and reviewed on March 11, 2019 at approximately 11:00 a.m.

2 2. Due to ongoing failure by Synergy Management to provide any sort of consistent
3 financial or operational reporting regarding the Mira Este Facility, I am unable to provide a
4 meaningful update to the Court.

5 3. As reported previously to this Court, Defendant Mira Este Properties, LLC, through
6 its hired agent Synergy Management, have failed continuously to provide Court-ordered documents
7 and reports. I am unable to determine whether the reason for this failure is due to simple
8 mismanagement or some other bad faith motive.

9 4. On January 16, 2019, through my counsel, we demanded a list of documents and
10 information from Mira Este Properties, LLC and its agent Synergy. Attached as **Exhibit A** is a true
11 and correct copy of my attorney's January 16, 2019 email to all counsel. After Mira Este Properties,
12 LLC and Synergy failed to provide any information or documents in response to the email, my
13 attorney was forced to write a follow up email three weeks later to ask yet again for a response.
14 Attached as **Exhibit B** is a true and correct copy of my attorney's February 6, 2019 email to all
15 counsel.

16 5. On February 7, 2019, I learned for the first time from counsel for Far West that
17 accountant Justus Henkus ceased providing accounting services for the Mira Este Facility.
18 Apparently, he stopped providing accounting services at Mira Este in November 2018—around the
19 same time Far West abandoned the Balboa Ave Dispensary. It is my understanding there has not
20 been an accountant or bookkeeper assisting with the Mira Este Facility since Mr. Henkus quit. I was
21 never informed until February 7, 2019.

22 6. After Synergy provided some partial answers and responsive information, I notified
23 the parties that I needed to conduct a site visit at the Mira Este Facility. I conducted a site visit on
24 February 25, 2019. I was able to meet face-to-face with Synergy and its counsel. At that meeting, I
25 was informed that Synergy was having issues with Edipure and that they may be vacating due to a
26 location change. Following that site visit, I memorialized my expectations of improved reporting by
27 Synergy and specifically listed certain demanded items in an email on February 27, 2019. Attached
28

1 as **Exhibit C** is a true and correct copy of my email to Synergy director Jerry Baca and Synergy's
2 counsel Matthew Mahoney. Other than the requested check in the amount of \$2500 to facilitate
3 payment of certain taxes and presentation of select invoices and payments to be made, Synergy failed
4 to provide the requested information.

5 7. Upon reviewing paragraph 12 of Defendant Hakim's declaration in support of his ex
6 parte application, I was surprised to read that Synergy is contractually required to provide, among
7 other things, weekly reports regarding the Mira Este Facility. I have never seen a single weekly
8 report from Synergy. I am unsure if Synergy is producing those weekly reports and simply not
9 providing them to me, or in the alternative, if Synergy is producing the weekly reports in compliance
10 with their contract but choosing to not share them with me.

11 8. At 9:24 a.m. this morning (March 11, 2019), I received updated financial reports from
12 Synergy. Attached as **Exhibit D** is a true and correct of the Accounts Receivable/Accounts Payable
13 Summary for 2019 that was provided. I was only able to initially review before drafting this
14 declaration. Upon my initial review, the report brings up new questions regarding the operational
15 and financial status of the Mira Este Facility. Below are some initial questions/concerns I have after
16 reviewing the report:

- 17 a. Rent deposits from "Dustin BTG" received in the amount of approximately
18 \$141,135.23 during 2019. Who/what is "Dustin BTG?"
- 19 b. Total revenue deposits of approximately \$47,870.44 from Edipure during
20 2019, but report shows total deposits of \$208,115.76 in 2019. What makes up
21 this additional revenue above and beyond payments from Edipure?
- 22 c. Payments to counsel for Synergy in the amount of \$7000. Is this for general
23 litigation as it relates to this case?

24 9. During the recent site visit, Synergy explained to me that Synergy was doing some of
25 its own "producing" and generating revenue at the Mira Este Facility. I am unable to decipher
26 whether any of that revenue is noted in the reports provided this morning. Further, I did not notice
27 any mention of the fact that Synergy is "producing" and generating revenue at the Mira Este Facility
28

1 in Defendant Hakim's ex parte application.

2 10. I am currently out of the country and unable to attend the March 12, 2019 *ex parte*
3 hearing.

4
5 I declare, under penalty of perjury under the laws of the State of California, that the foregoing
6 is true and correct. Executed this 11th day of March 2019.


7
8 
9 Michael Essary
Court Appointed Receiver

Exhibit A



Richardson Griswold <rgriswold@griswoldlawca.com>

Razuki v. Malan: Mira Este Status/Issues/Questions

Richardson Griswold <rgriswold@griswoldlawca.com>

Wed, Jan 16, 2019 at 4:49 PM

To: Steven Elia <steve@elialaw.com>, James Joseph <james@elialaw.com>, Maura Griffin <MG@mauragriffinlaw.com>, "Salvatore J. Zimmitti" <szimmitti@nelsonhardiman.com>, "Austin, Gina" <gaustin@austinlegalgroup.com>, "Leetham, Tamara" <tamara@austinlegalgroup.com>, "Daniel T. Watts (dwatts@galuppolaw.com)" <dwatts@galuppolaw.com>, Lou Galuppo <lgaluppo@galuppolaw.com>, charles gorla <chasgoria@gmail.com>, Matthew Dart <matt@dartlawfirm.com>, Matt Mahoney <mahoney@wmalawfirm.com>, Douglas Jaffe <douglasjaffe@aol.com>
Cc: Mike <Calsur@aol.com>, Jamie Eberhardt <jeberhardt@griswoldlawca.com>

Counsel,

I write separately to address Mira Este. We seek the following information/documents. Again, I am including all counsel so we are on the same page. I am aware that only a few of the attorneys on this email will likely have answers for us.

- 1) The last financial reports we received for Mira Este were from approx. November 5, 2018. We are requesting P&L, bank statements, accounting reports compiled by Mr. Henkus, Synergy or others.
- 2) Does Edipure remain as the only operating sub-producer at the property? Do they continue to pay \$30K (or more based on calculation of revenue) monthly? This relates to our request above in #1 for accounting reports showing revenue at Mira Este.
- 3) Is Synergy operating as a producer at Mira Este?
- 4) What is the status of negotiations with Cream of the Crop, or any other potentially-interested sub-providers, to operate at Mira Este?
- 5) We never received the fully executed Edipure extension agreement. Was it executed? Please provide a copy if so.
- 6) Please provide purchase/lease documentation, as well as documentation of appropriate liability insurance, for the van(s).

I look forward to your responses.

Thanks,
Red

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Exhibit B



Richardson Griswold <rgriswold@griswoldlawca.com>

Razuki v. Malan: Mira Este Status/Issues/Questions

Richardson Griswold <rgriswold@griswoldlawca.com>

Wed, Feb 6, 2019 at 1:14 PM

To: Steven Elia <steve@elialaw.com>, James Joseph <james@elialaw.com>, Maura Griffin <MG@mauragriffinlaw.com>, "Salvatore J. Zimmitti" <szimmitti@nelsonhardiman.com>, "Austin, Gina" <gaustin@austinlegalgroup.com>, "Leetham, Tamara" <tamara@austinlegalgroup.com>, "Daniel T. Watts (dwatts@galuppolaw.com)" <dwatts@galuppolaw.com>, Lou Galuppo <lgaluppo@galuppolaw.com>, Charles Goria <chasgoria@gmail.com>, Matthew Dart <matt@dartlawfirm.com>, Matt Mahoney <mahoney@wmalawfirm.com>, Douglas Jaffe <douglasjaffe@aol.com>

Cc: Mike <Calsur@aol.com>, Jamie Eberhardt <jeberhardt@griswoldlawca.com>

Chuck & Matt (Mahoney),

It has now been 3 weeks since my email request. You have both stated the info/docs are on the way. However, we still have not received any info/docs from either of you.

We are currently preparing a Receiver's Report and will be reporting this non-compliance to the Court.

Thanks,
Red

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On Wed, Jan 23, 2019 at 6:26 AM Richardson Griswold <rgriswold@griswoldlawca.com> wrote:

[Quoted text hidden]

Exhibit C

Richardson Griswold <rgriswold@griswoldlawca.com>

Synergy & Mira Este

calsur@aol.com <calsur@aol.com>

Wed, Feb 27, 2019 at 10:03 AM

To: mahoney@wmalawfirm.com, jrbaca@cox.netCc: rgriswold@griswoldlawsandiego.com, Maura@elialaw.com

Matt & Jerry,

Thank you for taking your time to meet with me and show me the facility. You have made quite a few improvements over my last inspection and they look great.

As we discussed at our meeting, I am expecting several items from you so that I get up to speed on your operations under CCG which is under my control:

1. You are going to retain a bookkeeper so that they can produce standard financials with bank statements going back to October 2018 and then coming forward to the current period. I'd also like to receive those reports on a monthly basis.
2. Purchase/registration/insurance information on the 2 vans you are using for deliveries and material pick up.
3. A check for \$2,500 payable to Michael Essary, Receiver to be used for the state tax filing that is delinquent.
4. Immediate updates on any new products being manufactured and any potential new producers who want to work under CCG.
5. Continued presentation of invoices for approval by me.
6. Discussion of your new cannabis counsel when you secure one - possible shared use by me for CCG needs.
7. Eventual payment of receivership expenses per the court order - to be discussed further.

I think our meeting was very productive and I plan on interacting more often to keep our communication lines open.

As I mentioned at the meeting, my previous position has not been positive about Synergy's operations due to the lack of information provided to me. Providing the items above will allow me to report differently to the court. Also, remember that if we get a new producer we can possibly approve the contract via stipulation between the parties and avoid the time necessary to set a hearing.

Thank you again and I look forward to hearing from you soon.

Mike

Exhibit D

CALIFORNIA CANNABIS GROUP

ACCOUNTS PAYABLE / RECEIVABLE

Balance

Date	Payee	Description	Amount Deposited	Amount Withdrawn	Received By	Approved By
1/2/2019	CCG	Dustin Payment BTG	\$14,443.85	\$0.00	Brad	Jerry
1/2/2019	CCG	Jennifer Payment EDIPURE	\$9,000.00		Brad	Jerry
1/3/2019	Intuit	Payroll Fees		\$60.00	Brad	Jerry
1/3/2019	Office Depot	OFFICE SUPPLIES		\$40.24	Brad	Jerry
1/4/2019	LEAF LOGIX	ERP SOFTWARE Check# 1073		\$3,043.55	Brad	Jerry
1/4/2019	Brad Grimes Payroll	Payroll -Check # 1074		\$1,141.16	Brad	Jerry
1/4/2019	Steve Sholl Payroll	Payroll -Check # 1075		\$369.19	Brad	Jerry
1/4/2019	Kristina Olson Payroll	Payroll - Check # 1076		\$415.64	Brad	Jerry
1/4/2019	Jennifer Hill Payroll	Payroll - Check # 1077		\$639.14	Brad	Jerry
1/4/2019	Elite Security	Monthly fees for Alarms		\$150.00	Brad	Jerry
1/4/2019	Over the counter	Over the counter		\$415.64	Brad	Jerry
1/5/2019	EDCO - Waste	Building Waste Management		\$355.00	Brad	Jerry

	1/8/2019	Culligan Water	Water for building			\$253.38	Brad	Jerry
	1/9/2019	Office Depot	OFFICE SUPPLIES			\$157.89	Brad	Jerry
	1/10/2019	Intuit	Payroll fees			\$77.00	Brad	Jerry
	1/10/2019	Edwards Security	Payroll - Check # 1078			\$5,376.00	Brad	Jerry
	1/10/2019	FASTRAK	TOLL ROADS			\$25.00	Brad	Jerry
	1/11/2019	CCG	Deposit		\$4,000.00		Brad	Jerry
	1/11/2019	AT&T	Monthly charge			\$98.85	Brad	Jerry
	1/14/2019	The Home Depot	Flooding supplies for building			\$60.39	Brad	Jerry
	1/15/2019	EDIPURE Payment	Excise Tax - check 1077212736		\$7,343.85		Brad	Jerry
	1/16/2019	IPFS IPFSMTMOK				\$140.22	Brad	Jerry
	1/17/2019	Bank direct Capit web				\$1,586.31	Brad	Jerry
	1/18/2019	Steve Sholl Payroll	Payroll - Check # 1080			\$326.88	Brad	Jerry
	1/18/2019	Kristina Olson Payroll	Payroll - Check # 1081			\$896.48	Brad	Jerry
	1/18/2019	Jennifer Hill Payroll	Payroll - Check # 1082			\$832.73	Brad	Jerry
	1/18/2019	Brad Grimes Payroll	Payroll - Check # 1083			\$1,141.16	Brad	Jerry
	1/18/2019	Brad Grimes OT	Cash			\$550.00	Brad	Jerry
	1/18/2019	Maintenance / contractor	Cash			\$1,610.00	Brad	Jerry

	1/18/2019	Office Depot	OFFICE SUPPLIES		\$253.07	Brad	Jerry
	1/19/2019	FASTRAK	TOLL ROADS		\$25.00	Brad	Jerry
	1/22/2019	CCG	PETTY CASH	\$1,000.00		Brad	Jerry
	1/22/2019	Bank direct Capit web			\$1,557.63	Brad	Jerry
	1/23/2019	ULINE	maintenance Supplies		\$141.52	Brad	Jerry
	1/23/2019	Maroon Print	Marketing		\$384.00	Brad	Jerry
	1/23/2019	Labor Law Center	Labor Law Posters		\$64.54	Brad	Jerry
	1/24/2019	CCG	PETTY CASH	\$2,000.00		Brad	Jerry
	1/24/2019	Brinks Group	Emergency fix of roof		\$2,701.00	Brad	Jerry
	1/24/2019	Custom products			\$46.31	Brad	Jerry
	1/25/2019	CCG	Monthly dues or rent BTG	\$6,930.00		Brad	Jerry
	1/25/2019	CCG	EXCISE TAXES BTG	\$50,000.00		Brad	Jerry
	1/25/2019	Adobe Acrobat Pro	software		\$14.99	Brad	Jerry
	1/25/2019	Smart Sign LLC			\$183.42	Brad	Jerry
	1/26/2019	Csd Btax Online	Taxes		\$234.00	Brad	Jerry
	1/28/2019	City Treasurer	Water Bill Check # 1079		\$3,783.32	Brad	Jerry
	1/28/2019	AT&T - 831-000-8281 989	Fiber Optic Check # 1084		\$1,399.95	Brad	Jerry

	1/28/2019	Knight Termite	PEST CONTROL Check # 1085		\$49.00	Brad	Jerry
	1/28/2019	RECON	Environmental Check # 1086		\$50.50	Brad	Jerry
	1/28/2019	RECON	Environmental Check # 1087		\$528.00	Brad	Jerry
	1/28/2019	SDGE GAS/ELECT	Suite 101 Check # 1088		\$193.61	Brad	Jerry
	1/28/2019	SDGE GAS/ELECT	Suite 100 Check # 1089		\$97.35	Brad	Jerry
	1/28/2019	SDGE GAS/ELECT	Suite Home Meter Check # 1090		\$366.84	Brad	Jerry
	1/28/2019	SDGE GAS/ELECT	Suite 101A Check # 1091		\$170.42	Brad	Jerry
	1/28/2019	SDGE GAS/ELECT	Suite 200 Check # 1092		\$339.08	Brad	Jerry
	1/28/2019	SDGE GAS/ELECT	Suite 202 Check #1093		\$344.33	Brad	Jerry
	1/28/2019	Edwards Security	Check # 1094		\$5,376.00	Brad	Jerry
	1/28/2019	TD Auto Finance	Check # 1095 Jerry's van		\$616.92	Brad	Jerry
	1/28/2019	The Loan Company	Check # 1096 Mortgage		\$23,081.50	Brad	Jerry
	1/28/2019	The Loan Company	Check # 1097 Mortgage		\$6,600.00	Brad	Jerry
	1/28/2019	Descriptive withdrawal			\$10.00	Brad	Jerry
	1/28/2019	CCG	EDIPURE (Wired)	\$15,000.00		Brad	Jerry
	1/31/2019	Spectrum Labs			\$162.14	Brad	Jerry
	1/31/2019	Spectrum Labs			\$0.01	Brad	Jerry

	1/31/2019	Jerry Withdrawal	Withdrawal		\$6,000.00	Brad	Jerry
	1/31/2019	CCG	Deposit	\$0.01		Brad	Jerry
	1/31/2019	CCG	Deposit	\$6,000.00		Brad	Jerry
	2/1/2019	Personal Concepts			\$92.49	Brad	Jerry
	2/1/2019	FASTRAK	TOLL ROADS		\$25.00	Brad	Jerry
	2/1/2019	Descriptive withdrawel			\$10.00	Brad	Jerry
	2/1/2019	Witham Mahoney	Check # 1098 (legal services)		\$7,000.00	Brad	Jerry
	2/1/2019	Brad Grimes Payroll	Check # 1099		\$1,012.56	Brad	Jerry
	2/1/2019	Jennifer Hill Payroll	Check # 1100		\$903.36	Brad	Jerry
	2/1/2019	Kristina Olson Payroll	Check #1101		\$965.22	Brad	Jerry
	2/1/2019	Steve Sholl Payroll	Check # 1102 (Last Check)		\$778.84	Brad	Jerry
	2/1/2019	Illuminate Tax, LLC	Check # 1103 Payroll services		\$912.75	Brad	Jerry
	2/1/2019	GWR CA, LLC	Check # 1104 Waste Management		\$500.00	Brad	Jerry
	2/1/2019	EDIPURE Payment	Outstanding AP (wired)	\$10,673.41		Brad	Jerry
	2/1/2019	Coastal Labs	QA Lab test for Synergy		\$189.00	Brad	Jerry
	2/2/2019	Ed Electronics			\$107.74	Brad	Jerry
	2/2/2019	Ed Electronics			\$107.74	Brad	Jerry
	2/2/2019	Ed Electronics			\$107.74	Brad	Jerry

2/2/2019	STAPLES	OFFICE SUPPLIES			\$82.51	Brad	Jerry
2/3/2019	INTUIT QB	QB Payroll services			\$60.00	Brad	Jerry
2/3/2019	Personal Concepts	Deposit		\$92.49		Brad	Jerry
2/5/2019	EDCO - Waste	Building Waste Management			\$355.00	Brad	Jerry
2/6/2019	ULINE- Custodian	Custodian Supplies			\$695.45	Brad	Jerry
2/6/2019	Coastal Analytical lab	laboratory testing			\$189.00	Brad	Jerry
2/6/2019	FASTRAK	TOLL ROADS			\$25.00	Brad	Jerry
2/7/2019	ULINE	Custodian Supplies			\$444.27	Brad	Jerry
2/8/2019	Maintenance / contractor	Payroll - cash			\$1,760.00	Brad	Jerry
2/8/2019	Brad Grimes OT	Payroll - cash			\$550.00	Brad	Jerry
2/8/2019	Edwards Security	Check # 1105			\$5,376.00	Brad	Jerry
2/8/2019	Employment Development	Check # 1106			\$197.85	Brad	Jerry
2/8/2019	GO DADDY	Website			\$12.17	Brad	Jerry
2/8/2019	In Gwr Ca	Ask my accountant			\$1,000.00	Brad	Jerry
2/8/2019	QUICKBOOKS	QUICKBOOKS			\$0.33	Brad	Jerry
2/12/2019	AT&T BILL	ATT - BILL			\$96.05	Brad	Jerry
2/13/2019	Intuit	Intuit Payrol fees			\$79.00	Brad	Jerry

2/13/2019	ULINE - Custodian	ULINE Custodian / Maintenance			\$251.17	Brad	Jerry
2/13/2019	Managed Learning Sol	Education			\$1.00	Brad	Jerry
2/12/2019	The Home Depot	twist locks			\$3.38	Brad	Jerry
2/15/2019	Culligan Water	Auto deduct on 2/15/19			\$107.50	Brad	Jerry
2/15/2019	Maintenance / contractor	Payroll - cash			\$1,610.00	Brad	Jerry
2/15/2019	Brad Grimes OT	Payroll - cash			\$550.00	Brad	Jerry
2/15/2019	Brad Grimes Payroll	Check # 1108			\$1,012.56	Brad	Jerry
2/15/2019	Jennifer Hill Payroll	Check # 1109			\$917.98	Brad	Jerry
2/15/2019	Kristina Olson Payroll	Check # 1110			\$981.08	Brad	Jerry
2/15/2019	FASTRAK	TOLL ROADS			\$25.00	Brad	Jerry
2/15/2019	External Deposit	owner pay / personal expenses		\$0.33		Brad	Jerry
2/15/2019	James Gang Company	Company T shirts			\$318.40	Brad	Jerry
2/15/2019	Dixieline Lumber	Bathroom locks			\$198.22	Brad	Jerry
2/16/2019	Managed Learning Sol	Education			\$37.00	Brad	Jerry
2/16/2019	ULINE - Custodian	ULINE Custodian / Maintenance			\$1,013.02	Brad	Jerry
2/16/2019	Culligan Water	Culligan water			\$53.90	Brad	Jerry
2/19/2019	FASTRAK	TOLL ROADS			\$25.00	Brad	Jerry

2/19/2019	HOME DEPOT	Custodian Supplies			\$459.66	Brad	Jerry
2/19/2019	Custom products	Custom Products			\$243.29	Brad	Jerry
2/19/2019	The Home Depot	twist locks for anchors for smoke detectors			\$25.80	Brad	Jerry
2/19/2019	HOME DEPOT	maintenance Supplies			\$213.28	Brad	Jerry
2/20/2019	Edwards Security	Check # 1111			\$5,376.00	Brad	Jerry
2/20/2019	Maintenance / contractor	Payroll - cash			\$1,450.00	Brad	Jerry
2/20/2019	Brad Grimes OT	Payroll - Cash			\$550.00	Brad	Jerry
2/20/2019	CCG	Dustin Payment BTG Rent	\$15,000.00			Brad	Jerry
2/20/2019	CCG	Dustin Payment BTG Payroll	\$14,761.38			Brad	Jerry
2/20/2019	CCG	Jennifer EDIPURE Payment	\$11,502.61			Brad	Jerry
2/20/2019	Bank direct Capit web	bank direct capit web			\$1,586.31	Brad	Jerry
2/20/2019	Bank direct Capit web	bank direct capit web			\$1,557.63	Brad	Jerry
2/20/2019	IPFS Unemployment	IPFS Unemployment			\$140.22	Brad	Jerry
2/20/2019	OFFICE DEPOT	OFFICE SUPPLIES			\$280.97	Brad	Jerry
2/21/2019	CA Franchise Tax brd	taxes online			\$5.75	Brad	Jerry
2/21/2019	CA Franchise Tax brd	taxes online			\$250.00	Brad	Jerry
2/21/2019	The Home Depot	Smoke Detectors			\$86.88	Brad	Jerry

2/25/2019	The Loan Company	Check # 1112		\$23,081.50	Brad	Jerry
2/25/2019	The Loan Company	Check # 1113		\$6,600.00	Brad	Jerry
2/25/2019	FASTRAK	TOLL ROADS		\$25.00	Brad	Jerry
2/25/2019	ADOBE PRO	ADOBE PRO SOFTWARE		\$14.99	Brad	Jerry
2/25/2019	ULINE	HAZMAT Compliance		\$1,141.17	Brad	Jerry
2/26/2019	CCG	EDIPURE PAYMENT	\$12,367.83		Brad	Jerry
2/26/2019	Maintenance / contractor	FUSES NEED REPLACEMENT		\$200.00	Brad	Jerry
2/26/2019	Maintenance / contractor	Payroll Cash		\$300.00	Brad	Jerry
2/27/2019	SDGE SUITE 101A	UTILITIES check # 1114		\$358.58	Brad	Jerry
2/27/2019	SDGE SUITE 100	UTILITIES check # 1115		\$207.58	Brad	Jerry
2/27/2019	SDGE SUITE 101	UTILITIES check # 1116		\$324.62	Brad	Jerry
2/27/2019	SDGE SUITE 202	UTILITIES check # 1117		\$861.09	Brad	Jerry
2/27/2019	SDGE SUITE 200	UTILITIES check # 1118		\$734.12	Brad	Jerry
2/27/2019	SDGE SUITE Home	UTILITIES check # 1119		\$831.29	Brad	Jerry
2/27/2019	Knight Pest Control	Monthly invoice check # 1120		\$49.00	Brad	Jerry
2/27/2019	Calsur Mgmt	Michael Essery check# 1121		\$2,500.00	Brad	Jerry
2/28/2019	GWR CA, LLC	Waste Management		\$500.00	Brad	Jerry

2/28/2019	Protective Insurance	Workmans comp			\$905.04	Brad	Jerry
2/29/19	Brad Grimes Payroll	Check # 1122			\$1,012.56	Brad	Jerry
2/29/19	Jennifer Hill Payroll	Check # 1123			\$722.76	Brad	Jerry
2/29/19	Kristina Olson Payroll	Check # 1124			\$855.04	Brad	Jerry
2/29/19	Maintenance / contractor	Payroll Cash			\$310.00	Brad	Jerry
2/29/19	Brad Grimes OT	Payroll Cash			\$550.00	Brad	Jerry
2/29/19	Jason Biggs - Cash	Last pay check - cash			\$800.00	Brad	Jerry
2/29/29	Distro Website build	Payment for Website build			\$900.00	Brad	Jerry
3/5/2019	EDCO Waste hauling	Waste Management			\$355.00	Brad	Jerry
3/6/2019	CCG Payroll	Contractor Payroll / Website		\$3,000.00		Brad	Jerry
3/8/2019	Edwards Security	Security Payroll Check # 1125			\$5,376.00	Brad	Jerry
3/8/2019	CCG-	Dustin Payment BTG Payroll		\$40,000.00		Brad	Jerry
3/11/2019	The Loan Company	Check # 1126			\$23,081.50	Brad	Jerry
3/11/2019	The Loan Company	Check # 1127			\$6,600.00	Brad	Jerry
				\$208,115.76	\$196,041.47		



1 **PROOF OF SERVICE**

2 *Salam Razuki v. Ninus Malan, et al.*

3 *San Diego County Superior Court Case No. 37-2018-00034229-CU-BC-CTL*

4 I am employed in the County of San Diego, State of California. I am over the age of 18 and
5 am not a party to the within action. I am employed by Griswold Law, APC and my business address
is 444 S. Cedros Avenue, Suite 250, Solana Beach, California 92075.

6 On *March 11, 2019*, I served the documents described as **RECEIVER MICHAEL**
7 **ESSARY'S DECLARATION IN RESPONSE TO DEFENDANT HAKIM'S EX PARTE**
8 **APPLICATION REGARDING MIRA ESTE** on each interested party, as follows:

9 **SEE ATTACHED SERVICE LIST**

10 **(VIA MAIL)** I placed a true and correct copy(ies) of the foregoing document in a sealed
11 envelope(s) addressed to each interested party as set forth above. I caused each such envelope, with
12 postage thereon fully prepaid, to be deposited with the United States Postal Service. I am readily
13 familiar with the firm's practice for collection and processing of correspondence for mailing with the
14 United States Postal Service. Under that practice, the correspondence would be deposited with the
United States Postal Service on that same day with postage thereon fully prepaid in the ordinary
course of business.

15 **(VIA OVERNIGHT DELIVERY)** I enclosed the documents in an envelope or package provided
16 by an overnight delivery carrier and addressed to each interested party. I placed the envelope or
17 package for collection and overnight delivery in the overnight delivery carrier depository at Solana
Beach, California to ensure next day delivery.

18 X **(VIA ELECTRONIC MAIL)** I caused true and correct copy(ies) of the foregoing document(s)
19 to be transmitted via **One Legal e-service** to each interested party at the electronic service addresses
listed on the attached service list.

20 **(BY FACSIMILE)** I transmitted a true and correct copy(ies) of the foregoing documents via
21 facsimile.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct. Executed on *March 11, 2019*, in Solana Beach, California.

24 
Katie Westendorf

SERVICE LIST

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