

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CIVIL NO. 08-5348 (ADM/JSM)**

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

3. The Faegre & Benson firm was personally retained by Frank Vennes to represent him in ongoing civil and criminal proceedings arising out of the federal investigation. James Volling of the Faegre & Benson firm serves as Mr. Vennes' chief legal counsel.

4. I am familiar with the rates charged in the local community by attorneys performing services similar to those provided by Mr. Volling and the Faegre & Benson law firm and certify that the requested rates are on the high end of but within the range charged by attorneys of comparable experience employed by comparable Minnesota law firms for work of a comparable nature and complexity.

5. I have reviewed the itemized statement describing services provided by the Faegre & Benson law firm and certify that to the best of my knowledge, and based on the representations of Mr. Volling, all of the stated work was actually performed and was necessary for representation of Mr. Vennes.

6. I request Court approval of the Receiver's fee application in favor of the law firm of Faegre & Benson in the amount of \$193,880.51

Oppenheimer Wolff & Donnelly LLP Fee Application

7. I have received a statement from Oppenheimer, Wolff & Donnelly LLP describing work performed by me and my agents during the period October 16, 2008 through November 26, 2008. The statement is available to the court for *in camera* review. The statement includes the date when work was performed, the name of the person performing the work, the time expended, and a detailed description of the work. The statement sets out the amount of compensation requested for the work performed. It

reflects hourly billing rates ranging from \$150 to \$505, a total of 325.75 hours, total fees of \$118,412.50, and a total amount due, including costs, of \$119,609.61.

8. I have reviewed the itemized statement describing services provided by my firm and certify that all of the stated work was actually performed and was necessary to fulfill my duties and responsibilities as Receiver. Any unnecessary or duplicative services were omitted from the statement.

9. I request Court approval of the Receiver's fee application in favor of the law firm of Oppenheimer Wolff & Donnelly LLP in the amount of \$119,609.61.

FURTHER AFFIANT SAYETH NOT.

s/ Gary Hansen
Gary Hansen

Subscribed and sworn to before me
this 10th day of December, 2008.

s/ Julie Ann Anderson
Notary Public