## 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.	)

## AFFIDAVIT OF RECEIVER FOR FRANK E. VENNES IN SUPPORT OF FEE APPLICATION OF FAEGRE & BENSON

STATE OF MINNESOTA )

( ) SS

( COUNTY OF HENNEPIN )

Gary Hansen, being first duly sworn, deposes and states:

- 1. I am an attorney with the law firm of Oppenheimer Wolff & Donnelly LLP. On October 16, 2008, the Court appointed me Receiver for Frank E. Vennes and related entities.
- 2. I have received two statements from the law firm of Faegre & Benson LLP describing work performed in February and March, 2009, respectively. To preserve attorney-client confidentiality and work product privileges, those statements are not attached to this Affidavit but are available to the Court for *in camera* review. The statements include 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 statements set out the amount of compensation requested for the work performed. They reflect hourly billing rates ranging from \$100 to \$595. The statement for February 2009 describes 151.60 hours, total fees of \$79,587.00 and a total amount due, including costs, of \$79,990.44. The statement for March 2009 describes 198 hours, total fees of \$98,003.50, and a total amount due, including costs, of \$98,613.06. The total of the two statements is \$178,603.50.

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 \$178,603.50.

FURTHER AFFIANT SAYETH NOT.

s/ Gary Hansen
Gary Hansen

Subscribed and sworn to before me this 1st day of May, 2009.

s/ Julie Ann Menk
Notary Public