

# **EXHIBIT A**

## FIGARI & DAVENPORT, L.L.P.

3400 Bank of America Plaza  
901 Main Street, LB 125  
Dallas, TX 75202-3796  
214-939-2000

Federal ID: 75-2137988

Bryan Cave, LLP  
JP Morgan Chase Tower  
2200 Ross Avenue, Suite 3300  
Dallas, TX 75201

Invoice No: 970981  
Invoice Date: Jun-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through May-31-2013

### INVOICE SUMMARY

PROFESSIONAL SERVICES	\$23,045.00
DISBURSEMENTS	\$255.85
10% PROFESSIONAL FEE DISCOUNT	(\$2,304.50)
TOTAL INVOICE	\$20,996.35
ADDITIONAL DISCOUNT	(\$996.35)
<b>BALANCE DUE</b>	<b>\$20,000.00</b>
CUMULATIVE FEES BILLED TO DATE:	\$0.00
CUMULATIVE COSTS BILLED TO DATE:	\$0.00
CUMULATIVE TOTAL BILLED TO DATE:	<hr/> \$0.00

**FIGARI & DAVENPORT, L.L.P.**

Client Name: Keith Aurzada

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Client No.: 16523

Invoice No: 970981

Invoice Date: Jun-1-2013

For Services Rendered Through May-31-2013

**Matter Info:** 16523-0001  
American Equity Funding, Inc.

**PROFESSIONAL SERVICES**

3/19/13	ACW	Telephone conference with K. Aurzada regarding new matter against American Equity Funding;	0.50
3/19/13	ACW	Download and review selected pleadings from receivership action;	0.20
3/19/13	ACW	Review notice of removal and petition from Haug v. AEF;	0.10
3/20/13	ACW	Compile prior files and documents regarding AEF;	0.50
3/22/13	ACW	Letter to J. Messer regarding use of AEF materials;	0.20
3/22/13	ACW	Review documents received from AEF and transcript of deposition of S. Whitlock;	0.40
3/25/13	ACW	Telephone conference with K. Aurzada;	0.10
3/25/13	ACW	Begin memorandum to J. Barcus with key pleadings and documents;	0.90
4/12/13	ACW	Prepare notice of appearance;	0.20
4/12/13	ACW	Exchange emails with K. Aurzada on available documents;	0.10
4/15/13	ACW	Exchange emails with B. Purcell;	0.10
4/15/13	ACW	Exchange emails with K. Aurzada regarding notice of appearance;	0.10
4/15/13	ACW	Exchange emails with K. Aurzada regarding memorandum to J. Barcus;	0.20
4/15/13	ACW	Revise and finalize memorandum to J. Barcus;	0.60
4/15/13	JMB	Review pleadings and related materials in preparation for research regarding claims against AEF;	1.50

## FIGARI &amp; DAVENPORT, L.L.P.

Client Name: Keith Aurzada

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Client No.: 16523

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4/16/13	JMB	Review client documents and other information;	4.50
4/17/13	ACW	Exchange emails with J. Barcus on scope of project;	0.10
4/17/13	ACW	Telephone conference with B. Purcell regarding Canadian Peso matter;	0.20
4/17/13	ACW	Email to B. Purcell regarding notice of appearance;	0.10
4/17/13	JMB	Research regarding viability of claims against escrow agents;	2.50
4/17/13	JMB	Review deposition of S. Whitlock of AEF;	2.50
4/18/13	JMB	Continue review of materials received from client and evaluation of potential claims held by the Receiver;	3.60
4/19/13	ACW	Finalize and file notice of appearance;	0.10
4/19/13	ACW	Letter to Judge Clark;	0.10
4/19/13	JMB	Continue review of and evaluation of potential claims for breach of fiduciary duty, fraud, and other torts against AEF and S. Whitlock;	2.60
4/23/13	ACW	Download and review docket sheet from Haug v. AEF;	0.10
4/23/13	ACW	Email to K. Aurzada regarding docket sheet;	0.10
4/23/13	JMB	Research regarding possible causes of action in absence of evidence that AEF was purposely complicit in J. Temme's fraud;	2.00
4/24/13	JMB	Additional research regarding potential claims on behalf of the Receiver;	2.40
4/25/13	JMB	Continue research regarding potential causes of action and review of subpoenaed documents regarding same;	2.70
4/26/13	JMB	Research potential private rights of action under Texas and Arkansas regulations governing real estate/mortgage brokers and/or escrow agents and prepare memo to file/client regarding same;	2.70

## FIGARI &amp; DAVENPORT, L.L.P.

Client Name: Keith Aurzada

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Client No.: 16523

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4/29/13	JMB	Research potential third party beneficiary arguments under escrow agreement and prepare memo to file/client regarding third party beneficiary and direct claims against escrow agent;	4.50
4/30/13	JMB	Memo to client/file regarding potential direct causes of action against AEF;	3.40
4/30/13	JMB	Additional research regarding potential fiduciary duty claims;	1.60
5/1/13	ACW	Review status of memorandum on potential claims against AEF;	0.50
5/3/13	JMB	Additional research regarding potential direct claims against AEF and other escrow agents under third-party beneficiary and common-law fiduciary duty theories;	2.50
5/6/13	JMB	Revise letter to client summarizing research and analyzing potential claims against AEF and other escrow agents;	2.20
5/7/13	JMB	Final revisions to letter to client summarizing research and analyzing potential claims against AEF and other escrow agents;	2.30
5/10/13	ACW	Revise analysis letter to K. Aurzada;	1.50
5/10/13	SLW	Cite check analysis letter to K. Aurzada;	1.00
5/13/13	ACW	Revise analysis letter to K. Aurzada;	1.30
5/14/13	ACW	Revise analysis letter to K. Aurzada;	2.00
5/15/13	JMB	Revise letter to K. Aurzada to address issues regarding standing to assert claims on behalf of funds and/or individual investors;	2.50
5/17/13	ACW	Review docket sheet and recent pleadings from Haug v. AEF;	0.20
5/17/13	JMB	Revise letter to K. Aurzada to address issues regarding standing to assert claims on behalf of funds and/or individual investors;	1.00

# FIGARI & DAVENPORT, L.L.P.

Client Name: Keith Aurzada

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Invoice No: 970981

Client No.: 16523

Invoice Date: Jun-1-2013

For Services Rendered Through May-31-2013

5/20/13	ACW	Revise analysis letter to K. Aurzada;	1.70
5/21/13	ACW	Revise analysis letter to K. Aurzada;	1.00
5/22/13	ACW	Email to K. Aurzada on Haug's answer;	0.10
5/22/13	ACW	Email to K. Aurzada on letter from City of Sandusky;	0.10
5/22/13	JMB	Finalize analysis letter to K. Aurzada;	0.20

John M. Barcus	Partner	47.20	350.00	16520.00
Andrew C. Whitaker	Partner	13.40	475.00	6365.00
Shelley White	Paralegal	1.00	160.00	160.00
<b>Total Professional Services</b>				<b>\$23,045.00</b>

**DISBURSEMENTS**

05/31/13	Xerox	254.85
05/31/13	Secretary of State of Texas	1.00

<b>TOTAL DISBURSEMENTS</b>	<b>\$255.85</b>
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<i>Total for Matter No: 16523-0001</i>	<i>\$23,300.85</i>
<i>10% Professional Fee Discount</i>	<i>(\$2,304.50)</i>
<i>Additional Discount</i>	<i>(\$996.35)</i>
<b>Balance Due</b>	<b>\$20,000.00</b>

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Invoice No: 970981  
Invoice Date: Jun-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through May-31-2013

REMITTANCE COPY

PROFESSIONAL SERVICES	\$23,045.00
DISBURSEMENTS	\$255.85
10% PROFESSIONAL FEE DISCOUNT	(\$2,304.50)
TOTAL INVOICE	\$20,996.35
ADDITIONAL DISCOUNT	(\$996.35)
<b>BALANCE DUE</b>	<b>\$20,000.00</b>

**THIS INVOICE IS PAYABLE UPON RECEIPT.**

**PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE.**

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JP Morgan Chase Tower  
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Dallas, TX 75201

Invoice No: 971297  
Invoice Date: Aug-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through Jul-31-2013

INVOICE SUMMARY

PROFESSIONAL SERVICES	\$2,992.50
DISBURSEMENTS	\$228.02
10% PROFESSIONAL DISCOUNT	(\$299.25)
TOTAL INVOICE	\$2,921.27
PRIOR OUTSTANDING INVOICES	\$20,000.00
<b>BALANCE DUE</b>	<b>\$22,921.27</b>
CUMULATIVE FEES BILLED TO DATE:	\$23,045.00
CUMULATIVE COSTS BILLED TO DATE:	\$255.85
CUMULATIVE TOTAL BILLED TO DATE:	<u>\$23,300.85</u>



**FIGARI & DAVENPORT, L.L.P.**

Client Name: Keith Aurzada

Page# 2

Client No.: 16523

Invoice No: 971297

Invoice Date: Aug-1-2013

For Services Rendered Through Jul-31-2013

**Matter Info:** 16523-0001  
American Equity Funding, Inc.

**PROFESSIONAL SERVICES**

6/27/13	ACW	Telephone conference with K. Aurzada;	0.20
6/27/13	ACW	Download and review docket sheet from Haug v. AEF;	0.10
6/27/13	ACW	Email to K. Aurzada regarding docket sheet from Haug v. AEF;	0.10
6/27/13	ACW	Exchange emails with K. Aurzada on amount paid to AEF;	0.10
7/1/13	ACW	Exchange emails with G. Murray regarding payments to AEF;	0.10
7/1/13	ACW	Telephone conference with G. Murray regarding payments to AEF;	0.30
7/1/13	ACW	Telephone conference with K. Aurzada regarding meeting with AEF;	0.10
7/1/13	ACW	Email to B. Purcell on escrow statements;	0.10
7/1/13	ACW	Review documents produced by AEF;	0.50
7/2/13	ACW	Telephone conference with J. Donnell (AEF's counsel) regarding meeting request;	0.50
7/2/13	ACW	Review documents produced by AEF;	0.50
7/3/13	ACW	Review documents produced by AEF and transcript of Whitlock's deposition;	0.30
7/3/13	ACW	Telephone conference with K. Aurzada regarding meeting with S. Whitlock;	0.20
7/3/13	ACW	Email to J. Dorrell regarding meeting with S. Whitlock;	0.20
7/3/13	ACW	Exchange emails with K. Aurzada on draft of email to J. Dorrell;	0.10

## FIGARI & DAVENPORT, L.L.P.

Client Name: Keith Aurzada

Page# 3

Invoice No: 971297

Client No.: 16523

Invoice Date: Aug-1-2013

### For Services Rendered Through Jul-31-2013

7/16/13	ACW	Review emails and attachments from G. Murray on documents needed from escrow/title companies;	0.20
7/16/13	ACW	Email to K. Aurzada and B. Purcell on meeting with S. Whitlock and G. Murray's emails;	0.20
7/25/13	ACW	Exchange emails with K. Aurzada and B. Purcell on next steps;	0.20
7/29/13	ACW	Telephone conference with B. Purcell on AEF documents and G. Murray's requests;	0.30
7/29/13	ACW	Exchange emails with K. Aurzada and B. Purcell on next steps;	0.10
7/30/13	ACW	Review documents produced by AEF for key documents of interest;	1.70
7/30/13	ACW	Download and review recent pleadings from Haug and AEF;	0.20

Andrew C. Whitaker	Partner	6.30	475.00	2992.50
<b>Total Professional Services</b>				<b>\$2,992.50</b>

### DISBURSEMENTS

06/06/13	Computer Legal Research - Lexis-Nexis	44.32
07/31/13	LD	1.05
07/31/13	Xerox	178.05
07/31/13	Pacer	4.60

<b>TOTAL DISBURSEMENTS</b>	<b>\$228.02</b>
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Total for Matter No: 16523-0001

\$2,921.27

## FIGARI & DAVENPORT, L.L.P.

Client Name: Keith Aurzada

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Invoice No: 971297

Client No.: 16523

Invoice Date: Aug-1-2013

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For Services Rendered Through Jul-31-2013

*Prior Outstanding Invoice*

\$20,000.00

***Balance Due***

**\$22,921.27**

**FIGARI & DAVENPORT, L.L.P.**

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Dallas, TX 75201

Invoice No: 971297  
Invoice Date: Aug-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through Jul-31-2013

REMITTANCE COPY

PROFESSIONAL SERVICES	\$2,992.50
DISBURSEMENTS	\$228.02
10% PROFESSIONAL DISCOUNT	(\$299.25)
TOTAL INVOICE	\$2,921.27
PRIOR OUTSTANDING INVOICES	\$20,000.00
<b>BALANCE DUE</b>	<b>\$22,921.27</b>

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Dallas, TX 75201

Invoice No: 971708  
Invoice Date: Sep-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through Aug-31-2013

INVOICE SUMMARY

PROFESSIONAL SERVICES	\$5,177.50
DISBURSEMENTS	\$97.54
PROFESSIONAL DISCOUNT	(\$517.75)
TOTAL INVOICE	\$4,757.29
PRIOR OUTSTANDING INVOICES	\$22,921.27
<b>BALANCE DUE</b>	<b>\$27,678.56</b>
CUMULATIVE FEES BILLED TO DATE:	\$26,037.50
CUMULATIVE COSTS BILLED TO DATE:	\$483.87
CUMULATIVE TOTAL BILLED TO DATE:	<u>\$26,521.37</u>

## FIGARI & DAVENPORT, L.L.P.

Client Name: Keith Aurzada

Page# 2

Invoice No: 971708

Client No.: 16523

Invoice Date: Sep-1-2013

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For Services Rendered Through Aug-31-2013

**Matter Info:** 16523-0001  
American Equity Funding, Inc.

### PROFESSIONAL SERVICES

8/5/13	ACW	Review documents produced by AEF for key documents;	2.30
8/6/13	ACW	Analyze and organize key documents produced by AEF;	1.60
8/6/13	ACW	Review pleadings from Haug v. AEF;	0.10
8/6/13	ACW	Email to Keith Aurzada and Brad Purcell regarding Haug v. AEF;	0.10
8/12/13	ACW	Exchange emails with Brad Purcell;	0.10
8/19/13	ACW	Telephone conference with Brad Purcell regarding documents from American Equity and Madison Settlement;	0.30
8/19/13	ACW	Telephone conference with Greg Murray regarding documents from American Equity and Madison Settlement;	0.20
8/19/13	ACW	Begin subpoena to Madison Settlement Services;	0.20
8/20/13	ACW	Begin letter to Jeffrey Dorrell regarding AEF's liability;	0.30
8/20/13	ACW	Revise subpoena to Madison Settlement Services;	0.20
8/20/13	ACW	Review deposition of David Breschi from Canadian Peso matter;	2.10
8/21/13	ACW	Revise subpoena to Madison Settlement Services;	0.20
8/21/13	ACW	Revise letter to Jeffrey Dorrell regarding AEF's liability;	0.40
8/21/13	ACW	Review documents produced by Madison Settlement Services in Canadian Peso matter;	0.20
8/23/13	ACW	Review email from Greg Murray with suggested document requests;	0.10
8/23/13	ACW	Revise subpoena to Madison Settlement Services;	1.70

# FIGARI & DAVENPORT, L.L.P.

Client Name: Keith Aurzada

Page# 3

Client No.: 16523

Invoice No: 971708

Invoice Date: Sep-1-2013

For Services Rendered Through Aug-31-2013

8/23/13	ACW	Letter to Steve Whitlock (AEF) regarding document requests;	0.40
8/23/13	ACW	Email to Greg Murray, Keith Aurzada, and Brad Purcell regarding subpoena to Madison Settlement Services and letter to Steve Whitlock (AEF);	0.20
8/27/13	ACW	Telephone conference with Brad Purcell on letter to Steve Whitlock (AEF);	0.20

Andrew C. Whitaker	Partner	10.90	475.00	5177.50
<b>Total Professional Services</b>				<b>\$5,177.50</b>

**DISBURSEMENTS**

08/31/13	LD		.49
08/31/13	Xerox		97.05

**TOTAL DISBURSEMENTS** **\$97.54**

<i>Total for Matter No: 16523-0001</i>	<b>\$4,757.29</b>
<i>Prior Outstanding Invoice</i>	<b>\$22,921.27</b>
<b>Balance Due</b>	<b>\$27,678.56</b>

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Invoice No: 971708  
Invoice Date: Sep-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through Aug-31-2013

REMITTANCE COPY

PROFESSIONAL SERVICES	\$5,177.50
DISBURSEMENTS	\$97.54
PROFESSIONAL DISCOUNT	(\$517.75)
TOTAL INVOICE	\$4,757.29
PRIOR OUTSTANDING INVOICES	\$22,921.27
<b>BALANCE DUE</b>	<b>\$27,678.56</b>

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JP Morgan Chase Tower  
2200 Ross Avenue, Suite 3300  
Dallas, TX 75201

Invoice No: 971911  
Invoice Date: Oct-1-2013

Matter No.: 16523-0001  
American Equity Funding, Inc.

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For Services Rendered Through Sep-30-2013

**INVOICE SUMMARY**

PROFESSIONAL SERVICES	\$380.00
PROFESSIONAL DISCOUNT	(\$38.00)
TOTAL INVOICE	\$342.00
PRIOR OUTSTANDING INVOICES	\$27,678.56
<b>BALANCE DUE</b>	<b>\$28,020.56</b>
CUMULATIVE FEES BILLED TO DATE:	\$31,215.00
CUMULATIVE COSTS BILLED TO DATE:	\$581.41
CUMULATIVE TOTAL BILLED TO DATE:	<u>\$31,796.41</u>

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## FIGARI & DAVENPORT, L.L.P.

Client Name: Keith Aurzada

Page# 2

Client No.: 16523

Invoice No: 971911

Invoice Date: Oct-1-2013

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For Services Rendered Through Sep-30-2013

**Matter Info:** 16523-0001  
American Equity Funding, Inc.

### PROFESSIONAL SERVICES

9/4/13	ACW	Exchange emails with Brad Purcell on letter to AEF/Steve Whitlock;	0.10
9/13/13	ACW	Exchange emails with Brad Purcell on letter to AEF/Steve Whitlock;	0.10
9/20/13	ACW	Email to Brad Purcell regarding Madison Settlement and AEF documents;	0.10
9/20/13	ACW	Exchange emails with Brad Purcell regarding documents we are seeking;	0.20
9/23/13	ACW	Telephone conference with Brad Purcell on document requests to AEF and Madison Settlement;	0.20
9/26/13	ACW	Exchange emails with Brad Purcell on Madison Settlement documents;	0.10
		<u>Andrew C. Whitaker Partner</u>	<u>0.80 475.00 380.00</u>
		<u>Total Professional Services</u>	<u>\$380.00</u>

*Total for Matter No: 16523-0001* *\$342.00*

*Prior Outstanding Invoice* *\$27,678.56*

***Balance Due*** ***\$28,020.56***

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PROFESSIONAL DISCOUNT	(\$38.00)
TOTAL INVOICE	\$342.00
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<b>BALANCE DUE</b>	<b>\$28,020.56</b>

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