



Receivership Estate states as follows:

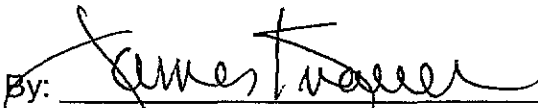
1. On February 27, 2001, James A. Knauer was appointed Examiner herein.
2. On March 28, 2001, James A. Knauer was appointed Receiver over all assets and interests of all entity Defendants and Relief Defendants, with the exception of Steadfast Ministries, Inc.
3. This Court previously approved fee and expense applications filed by the Examiner and his counsel. See entries of April 26, 2001 and May 2, 2001 (approving the payment of fees and expenses totaling \$29,770.90). In relevant part, this Court's previous fee awards provided that the awards "shall be payable from boat sale proceeds as more specifically set forth in this Court's Order of February 27, 2001. To the extent that the boat sale proceeds are not sufficient to fund this fee award, the Examiner may make further application to the Court."
4. To date, a boat sale has not been consummated. In fact, the Receiver's counsel was advised this date that the Defendants rejected a \$48,000 sale offer on May 31, 2001 – notwithstanding the boat dealer's belief that the boat's fair market value ranges between \$45,000 and \$50,000.
5. The professional fees and expenses previously approved by this Court already exceed the \$20,000 payment referenced in this Court's Order of Permanent Injunction and Other Equitable Relief of February 27, 2001 (para. VII, at p. 10), and additional fees and expenses have been incurred but not yet put before the Court in the form of a fee application.

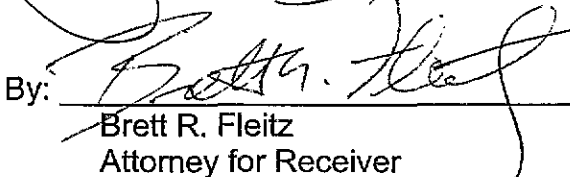
6. For these reasons, and because the Receiver reasonably anticipates the Receipt of funds in the estate, your Receiver requests that he be authorized to pay any previously Court-approved awards of professional fees and expenses from any general funds of the Receivership estate.

**REQUEST FOR RELIEF**

Your Receiver respectfully requests authority to pay any previously Court-approved awards of professional fees and expenses from any general funds of the Receivership's estate, and for any other necessary relief.

Respectfully submitted,

By:   
James A. Knauer, Receiver

By:   
Brett R. Fleitz  
Attorney for Receiver

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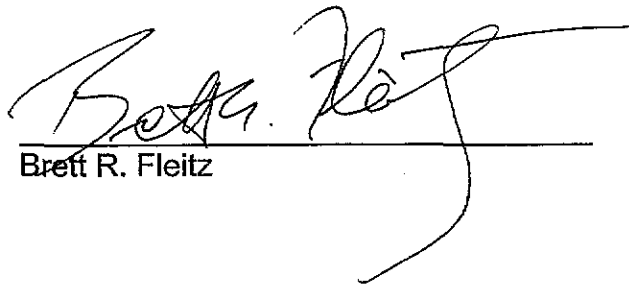
CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served upon the following parties by placing a copy of the same in the United States Mail, first class postage pre-paid, on this 4<sup>th</sup> day of June, 2001:

Thomas J. Eme  
Scott Hlavacek  
United States Securities and Exchange Commission  
500 West Madison Street  
Suite 1400  
Chicago, Illinois 60661-2511

John E. Brinker, Jr.  
9378 Mason-Montgomery Road,#102  
Mason, OH 45440

Gary J. Bentz  
11961 Fallcreek Lane  
Loveland, Ohio 45140-4809



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