

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

v. :

TODAYS GROWTH CONSULTANT INC. :  
(dba THE INCOME STORE) :

and :

KENNETH D. COURTRIGHT, III, :

Defendants. :

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Civil Action No. 1:19-CV-08454

**RECEIVER’S EIGHTEENTH STATUS REPORT**

Melanie E. Damian, the court-appointed receiver (“Receiver”) in the above-captioned enforcement action (“SEC Enforcement Action”), submits her eighteenth status report. This interim report sets forth the Receiver’s activities and efforts to fulfill her duties under the Appointment Order [ECF No. 19] for the period from April 1, 2024, through June 30, 2024 (the “Reporting Period”).

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## I. INTRODUCTION

Since her appointment on December 30, 2019, the Receiver, with the assistance of her retained professionals, worked diligently to continue to fulfill her duties and obligations as set forth in the Appointment Order.

Specifically, the Receiver *inter alia* continued to litigate the Estate's claims against several merchant cash advance companies and an insider of Defendant Today's Growth Consultant Inc. ("TGC") who had improperly received significant recoverable transfers from TGC and/or aided and abetted Defendant Kenneth D. Courtright, III ("Courtright") in the TGC scheme. To date, the Receiver recovered nearly \$13.5 million from various third-parties, insiders, and affiliates of Defendants.

As a result of those and other recoveries, including from the sale of TGC's assets, by the Receiver, on or around December 5, 2023, the Estate made the Court-approved initial monetary distribution exceeding \$7 million (in addition to distribution of over \$7.8 million in digital assets to investors, as explained *infra* at p. 7), in accordance with the Receiver's Amended Monetary Distribution Plan [ECF No. 283] and Order Granting Receiver's Unopposed Motion to Amend Court-Approved Monetary Distribution Plan [ECF No. 295].

During the administration of the initial distribution, various investors asked the Court to accept their late claims and/or to amend their allowed claim amounts and/or distribution amounts. The Receiver reviewed their completed claim forms and determined that the late and amended claims should be allowed against the Estate to the extent otherwise valid and the late filing was for good cause. She then filed her Motion to Amend Court-Approved Monetary Distribution Plan [ECF No. 318] requesting authority from the Court to approve those claims and to make an initial distribution to those claimants. During the Reporting Period, the Court granted that Motion and

the Receiver made the approved distributions. The Receiver also assisted claimants with lost checks and changes of payee information by reissuing their distributions as needed.

## II. PROCEDURAL BACKGROUND

The Appointment Order entered on December 30, 2019, directs the Receiver to file with the Court within thirty (30) days after the end of each calendar quarter her report and recommendations regarding the status and activities of the Receivership Estate and TGC's business operations during the prior calendar quarter. *See* ECF No. 19. In particular, the Receiver's quarterly status reports are required to include: (1) a summary of the operations of the Receiver; (2) a summary of cash on hand, accrued administrative expenses, and the amount of unencumbered funds in the Estate; (3) a schedule of the Estate's receipts and disbursements; (4) a description of all known assets of the Estate; (5) a description of liquidated and unliquidated claims held by the Estate; (6) a list of all known creditors of the Estate; (7) a status of Creditor Claims Proceedings (once commenced); and (8) the Receiver's recommendations for a continuation or discontinuation of the receivership. *See* ECF No. 19 at pp. 21-22.

On January 30, 2020, as required under the Appointment Order, the Receiver filed her Initial Status Report, which described, among other things, the Receiver's activities and efforts to fulfill her obligations under the Appointment Order during the first thirty (30) days of the receivership. *See* ECF No. 45. Importantly, in her Initial Status Report, the Receiver concluded that TGC's business records confirm the allegations as set forth in the SEC's Complaint [ECF No. 1]. *See* EFC No. 45. Specifically, because TGC's revenue from all of the websites each month was significantly less than the monthly payment obligations to the investors and are thus not sufficient to cover both monthly payments to investors as well as TGC's monthly overhead expenses, the Receiver concluded that the long-term costs associated with maintaining and

preserving the digital assets of TGC was not in the best interest of the Receivership Estate.<sup>1</sup> *See id.* Based on this conclusion and the Receiver's analysis of the equities of all interested parties, including the investors, the receipts, and expenses of TGC's operations and of the Receivership Estate, and likely recoveries of the Estate, the Receiver outlined her proposal to promptly seek Court approval for a claims process and partial distribution plan which provided for, among other things, the transfer of websites to investors electing to receive them in lieu of monetary distributions. *See id.* On February 28, 2020, the Receiver filed her Bifurcated Claims Process Motion. *See* ECF No. 53. The Court granted the Receiver's Claims Process Motion on November 30, 2020 [ECF No. 109], and the Receiver implemented the plan as set forth therein, including more recently implementing the monetary distribution phase of the bifurcated process.

The Receiver's subsequent status reports detailed, among other things, the Receiver's continued efforts to carry out her duties and obligations as set forth in the Appointment Order including, without limitation, her efforts to preserve, maintain, and recover the assets of TGC, liquidate those assets, pursue claims of the Estate, and distribute a significant portion of the Estate's funds to the victims of TGC's fraud. *See* ECF Nos. 81, 101, 115, 127, 160, 172, 184, 202, 220, 233, 242 (supplementing 233), 247, 265, 292, 303, 311 and 321.

### **III. STATUS AND ACTIVITIES OF THE RECEIVERSHIP**

During the Reporting Period, the Receiver, with the assistance of her professionals, continued to fulfill all duties and obligations as set forth in the Appointment Order. In particular, the Receiver focused her attention and resources on:

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<sup>1</sup> Indeed, the Receiver detailed in her quarterly status reports the significant expenses associated with merely maintaining the assets, including retaining a skeletal group of IT professionals and the ongoing carrying costs of the domains and websites and eventually, as a cost-saving measure, eliminating the outside IT group and moving the remaining day-to-day operations to the Receiver's in-house team. *See* ECF Nos. 45, 81, 101, 115, 127, 160, 172, 184, 202, 220, 233, 247, 265, and 292.

- (A) responding to inquiries from, and addressing issues raised by, investors who participated in the Court-approved claims process regarding the monetary distributions and/or the status of the SEC Enforcement Action, the criminal proceeding against Courtright, and the Receivership;
- (B) sending the initial distributions to claimants with approved late claims and amended claims to allow those claimants to participate in the Court-approved initial distribution;
- (C) continuing to litigate pending recovery actions against several merchant cash advance companies and an insider of TGC who received significant transfers from TGC without providing reasonably equivalent value, and/or facilitated and assisted TGC and Courtright to commit the alleged fraud that is the subject of the SEC Enforcement Action; and
- (D) working with her forensic accountant to analyze the reconstructions of accounts of TGC, perform damages calculations and other analyses to support the Receiver's claims against the merchant cash advance companies, and to calculate the restitution amount for purposes of the criminal proceeding against Courtright and the SEC enforcement action.

**A. *The Court-Approved Claims Process and Responding to Investor Inquiries***

As previously reported, in accordance with this Court's Memorandum and Opinion Order granting the Receiver's Claims Process Motion [ECF No. 109], on December 15, 2020, the Receiver sent Claims Packages to 832 potential claimants (including government taxing agencies) via email and another 24 Claims Packages via U.S. Mail or Federal Express. Shortly after sending out the Claims Packages, the Receiver and her professionals began receiving, organizing, and processing completed claim forms that claimants had sent to the Receiver's email address established for the claims process ([IncomeStoreClaims@dvl1p.com](mailto:IncomeStoreClaims@dvl1p.com)).

Pursuant to her Final Determinations of all claimants' claims (including the late-filed claims), the Receiver approved claims for monetary distributions as follows: \$71,970,801.36 in investor claims, \$1,118,248.04 in creditor claims (\$760,552.17 of which is subordinated to the

claims of investors pursuant to an agreed order), and \$17,110.20 in employee/independent contractor claims.

The Receiver's Amended Monetary Distribution Plan provided for a *pro rata* distribution of funds to claimants holding Allowed Claims totaling \$72,355,659.66, providing a 9.94% recovery to those claimants.<sup>2</sup> At the end of the prior reporting period, the Estate made the initial monetary distribution by sending \$7,193,181.48 to investors and employee/independent contractors holding Allowed Claims (by electronic check to domestic claimants and by wire transfer to international claimants) in accordance with the Court-approved Amended Monetary Distribution Plan [ECF No. 283], which included allowed late-filed claims submitted before July 5, 2023.

During the Reporting Period, the Court approved an additional 15 late-filed and/or amended claims against the Estate, totaling \$2,280,581.46, as described in the Receiver's Motion to Amend Court-Approved Monetary Distribution Plan [ECF No. 318], which was granted by this Court [ECF No. 325]. The Receiver then made the same 9.94% initial distribution to those claimants with allowed late claims and amended claims, as provided in Exhibit A to that Motion [ECF No. 318-1].

Also, during the Reporting Period, the Receiver's office continued assisting investors in depositing their electronic checks and in assigning allowed claims held in the names of now-closed companies. This required updating many claimant names and contact information and then reissuing checks in individual names instead of in company names. The Receiver's office also

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<sup>2</sup> The subordinated creditor claim in the amount of \$760,552.17 and the \$7.8 million in claims that were satisfied through the return of investor websites are not included in the total Allowed Claims amount. Also, claims totaling \$310,195.96, which were satisfied through the class action styled *PLB Investments LLC, et al. v. Heartland Bank and Trust Company*, 1:20-cv-1023 (N.D. Ill.), were withdrawn and are not included in the Allowed Claims total.

worked with IRA administrators to assist claimants who needed to deposit their initial distributions back into their IRAs. At the time this Report was filed, one check totaling \$30,203.68 remained uncashed, and the Receiver is following up with that claimant by email and telephone to assist with depositing that check. Other checks were deemed undeliverable by email or could not be deposited by certain claimants due to their banks' policies. As a result, certain claimants requested cancelation and re-issuance of their electronic checks in other formats. Those electronic checks were reviewed to ensure that they remained uncashed and then canceled and replaced by wire transfer or physical check.

During the Reporting Period, the Receiver continued to regularly communicate with investors through the email accounts, telephone number, and Receivership website established to provide information to and address the questions and concerns of, investors. In particular, through the email accounts established for the Receivership ([IncomeStore@dvllp.com](mailto:IncomeStore@dvllp.com) and [IncomeStoreClaims@dvllp.com](mailto:IncomeStoreClaims@dvllp.com)) and the telephone number set up soon after the commencement of the Receivership, the Receiver's professionals responded to investors' communications regarding (i) the Court-approved claims process and the initial distribution as described above, (ii) updated investor contact information, (iii) late-filed and amended claims, (iv) the assets of the Estate sold at the online auction sale and directly to third parties and the results of the sales, and (v) the SEC Enforcement Action and Receivership in general.

***B. Pursuing Recovery Claims Against Merchant Cash Advance Companies and an Insider of TGC***

During the Reporting Period, the Receiver and her counsel continued to litigate the two remaining recovery actions (for fraudulent transfers and aiding and abetting Courtright's fraud and breach of fiduciary duties) commenced during prior reporting periods in this District, including the action against several merchant cash advance companies that TGC had utilized and the action

against an insider of TGC, including by participating in settlement negotiations and a judicial settlement conference and filing a motion for summary judgment and motion to exclude proposed experts in the action against the merchant cash advance companies, and filing post-trial briefs in the action against William Courtright, the brother of Courtright an insider of TGC, and his company.<sup>3</sup>

In the action against the merchant cash advance companies, including EIN Cap, Inc., Alpha Capital Source, Inc., BMF Capital, LLC, Fundkite, LLC, AKF, Inc., World Global Capital, LLC, Fox Capital Group, Inc., High Five Group, LLC, and Sutton Funding NY, Inc. (collectively, the “MCAs”), Case No. 1:21-cv-01792 (the “MCA Recovery Action”) the Receiver’s motion to strike pleadings of the MCAs remains pending. *See* Case No. 1:21-cv-01792 at ECF No. 136. During the prior reporting period, fact discovery and the Receiver’s expert disclosures were completed. During this Reporting Period, the parties engaged in settlement negotiations and participated in a settlement conference before the Magistrate Judge, after which the Receiver and two MCAs (AKF, Inc. and Fox Capital Group, Inc.) reached settlements requiring them to make payments totaling \$85,000 to the Estate. Thereafter, AKF, Inc. made its \$35,000 settlement payment, and Defendant Fox Capital Group, Inc. made its \$50,000 settlement payment, and the Receiver submitted the settlement agreements to this Court for approval. Also, the Receiver and two other MCAs (Alpha Capital Source, Inc. and High Five Capital Group, LLC) reached an agreement pursuant to which consent judgments for the full amounts of the net gains they received from TGC would be entered against those Defendants. On June 3, 2024, Consent Final Judgments were entered against

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<sup>3</sup> As detailed in the Receiver’s prior Status Reports, to preserve the minimal funds in the Receivership Estate at the time, the Receiver and her counsel did not bill the Estate for the formulation and litigation of these recovery claims. Rather, on September 16, 2020, the Receiver filed her Motion for Approval of Contingency Fee Arrangement for such claims. *See* ECF No. 99. And, on November 5, 2020, the Court granted that Motion. *See* ECF No. 103.

Defendants Alpha Capital Source, Inc. in the amount of \$118,770 and High Five Capital Group, LLC in the amount of \$1,090,494. *See* Case No. 1:21-cv-01792 at ECF Nos. 178 and 179.

Because the Receiver could not reach settlements with the other four MCAs (EINCap, Inc., BMF Capital, LLC, World Global Capital, LLC, and FundKite, LLC), during the Reporting Period, the Receiver filed her motion for summary judgment on all Counts of her Complaint against those non-settling MCAs and a motion to exclude their experts. *See id.* at ECF Nos. 171 and 172. Defendants did not file a response in opposition to either motion.

The Receiver also advanced the Estate's claims for recovery of fraudulent transfers and unjust enrichment against William Courtright and Courtright Consulting, Inc., Case No. 1:21-cv-01694 (the "William Courtright Action), pending in this District, seeking to recover the nearly \$2.3 million that TGC had paid to those defendants without receiving reasonably equivalent value. The bench trial took place during the prior reporting period, on January 24, 25 and 26, 2024. During this Reporting Period, the Receiver completed the post-trial briefing [ECF Nos. 115 and 119] as requested by the trial Court.

Upon the conclusion of these last two remaining ancillary actions, the Receiver will request Court authority to make a final distribution to claimants with allowed claims and move to close the Estate and discharge the Receiver.

***C. Assistance of Receiver's Forensic Accountant and Tax Consultant***

During the initial reporting period, the Receiver retained Kapila Mukamal LLP ("Kapila") as her forensic accountant and tax consultant to assist her in fulfilling her duties under the Appointment Order. Kapila assisted the Receiver with an in-depth investigation of TGC's former business operations, accounting and banking records, and transactions involving investors, creditors, third-parties, insiders, and affiliates.

During the Reporting Period, Kapila provided valuable support to the Receiver in connection with confirming late-filed claims as the Receiver's forensic accountant, providing important advice, analysis, and/or damages calculations as the Receiver's retained expert in the MCA Recovery Action and the William Courtright Action, and assisting with the calculations of the restitution amount for purposes of the SEC Enforcement Action and Courtright's criminal proceeding.<sup>4</sup>

**D. Courtright's Criminal Proceeding**

The Receiver continued to monitor Defendant Courtright's criminal proceeding styled *United States of America v. Kenneth D. Courtright*, Case No. 20-CR-77, for which the jury trial was held and Courtright was convicted on all counts charged. During the Reporting Period, Defendant Courtright was sentenced to 90 months in prison, and the Receiver (with Kapila's assistance) worked with the U.S. Attorney's Office to calculate the restitution owed to Courtright's victims.

**IV. ESTATE'S CASH ON HAND, EXPENSES, AND DISBURSEMENTS**

As of the end of the Reporting Period (June 30, 2024), the Estate held a total of \$1,301,523.34 in cash on hand, comprising, among other things, the net proceeds of the sale of the Estate's digital assets, and settlement funds received from third-parties, insiders, affiliates, and former professionals of TGC against whom the Receiver pursued claims. *See* Standardized Fund Accounting Report reflecting starting and ending balances, and receipts and disbursements, of the

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<sup>4</sup> Pursuant to the parties' Stipulation and Order Concerning the Receiver's Payment of Expenses in the Ancillary Actions [ECF No. 228] and the Court's Order granting same [ECF No. 229], the Receiver was authorized to retain Kapila as her expert witness in the Ancillary Actions *nunc pro tunc* to January 1, 2022. Further, the Receiver's Lead Counsel, Damian Valori Culmo agreed to advance payment for all reasonable expenses incurred in connection with the Ancillary Actions, including the expenses of Kapila or any other retained expert(s) to manage the expenses of the Estate. *See* ECF No. 228.

Receiver's fiduciary account, attached hereto as **Exhibit A**. The Receiver deposited such funds in her fiduciary account for the Receivership Estate at City National Bank in Miami, Florida.

On March 2, 2022, the Court had entered the parties' Stipulation and Order Concerning Receiver's Interim Fee Applications that, among other things, set forth the timing and procedure for payment of the Receiver's and her professionals' outstanding administrative fees and further governing the protocol for application and payment of the Receiver's and her professionals' administrative fees set forth in all future fee applications. *See* ECF No. 191. In conformance with these procedures, during the Reporting Period, on May 14, 2024, the Receiver filed her Seventeenth Interim Application for an Order Approving and Authorizing Payment of Fees and Expenses of Receiver and Her Professionals [ECF No. 324] (the "17<sup>th</sup> Fee Application"), seeking approval and payment of certain fees and costs incurred during the first quarter of 2024. The 17<sup>th</sup> Fee Application is pending before this Court.

During the next reporting period, the Receiver will file her Eighteenth Interim Application for an Order Approving and Authorizing Payment of Fees and Expenses of Receiver and Her Professionals, seeking approval and payment of the fees and costs incurred by certain of the Receiver's professionals in connection with fulfilling the Receiver's duties under the Court's Orders during this Reporting Period.

#### **V. KNOWN PROPERTY OF THE RECEIVERSHIP ESTATE**

As of the end of the Reporting Period (June 30, 2024), the Receiver was in possession, custody, or control of the following assets of the Receivership Estate:

- \$1,301,523.34 in cash on hand in the Receiver's fiduciary account;
- 85 domain names (precise value currently unknown) of which 49 remain active. As the domains expire, the Receiver has elected not to renew them in order to save the costs of maintaining domains having little to no value;
- Claims against William Courtright and Courtright Consulting, Inc.; Case

No. 2:20-cv-01012; Venue in the United States District Court for the Northern District of Illinois;

- Claims against EIN Cap, Inc., BMF Capital, LLC, FundKite, LLC, World Global Capital, LLC, Case No. 21-cv-01792; Venue in the United States District Court for the Northern District of Illinois;
- Judgment against High Five Group, LLC in the amount of \$1,090,494, plus interest;
- Judgment against Alpha Capital Source, Inc. in the amount of \$118,770, plus interest;
- Judgment against Legacy Families in the amount of \$154,038.50, plus interest; and
- Judgment against JDS Consulting in the amount of \$121,409.65, plus interest.

## **VI. KNOWN CREDITORS OF THE RECEIVERSHIP ESTATE**

As detailed above, after allowing the late-filed claims that were approved during the Reporting Period, the Receiver has allowed a total of \$71,970,801.36 in investor claims, \$1,118,248.04 in creditor claims (\$760,552.17 of which is subordinated to the claims of investors pursuant to an agreed order), and \$17,110.20 in employee/independent contractor claims. During a prior reporting period, the Receiver made an initial distribution to the investors and employee/independent contractors with Allowed Claims totaling \$7,193,181.48, providing those claimants with a 9.94% recovery.

During the Reporting Period, as explained above, an additional 11 investors asked the Court to accept their late claims totaling \$1,590,337.46 due to a lack of prior notice of the claims process. Another 4 investors asked the Receiver to amend their allowed claim amounts totaling \$690,244.00 due to failure to receive the Receiver's claims determination letters and inability to seek timely reconsideration. The Receiver determined that the late and amended claims should be

allowed against the Estate and requested authority from the Court to approve those claims and to make an initial distribution to those claimants. The Court approved the Receiver's unopposed Motion and the Receiver made the approved 9.94% distribution to those claimants. *See* Exhibit A.

## **VII. RECOMMENDATION FOR CONTINUATION OF RECEIVERSHIP AND CONCLUSION**

The Receiver recommends the Receivership continue so she may litigate to conclusion the Estate's remaining two actions against the MCAs and insiders William Courtright and his company, maximize the value of the Estate's assets for the benefit of the investors and creditors of the Estate, finalize the transfer and sale of the remaining domains of the Estate, and make the final distributions to allowed claimants in accordance with the Monetary Distribution Plan, as amended, and any further order of this Court.

The Receiver will continue to perform all other duties as mandated by the Appointment Order and update the Court on a quarterly basis as to the status and activities of the Receivership.

Respectfully submitted this 23<sup>rd</sup> day of July 2024.

Respectfully submitted,

/s/ Kenneth Dante Murena  
Kenneth Dante Murena, Esq.  
Florida Bar No. 147486  
DAMIAN VALORI CULMO  
1000 Brickell Avenue, Suite 1020  
Miami, Florida 33131  
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*Counsel for Melanie E. Damian,  
Court-Appointed Receiver  
Admitted Pro Hac and General Admission  
to Northern District of Illinois*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic transmission via this Court's CM/ECF filing system on July 23, 2024, on all counsel or parties who have appeared in the above-styled action.

/s/Kenneth Dante Murena  
Kenneth Dante Murena, Esq.  
  
*Counsel for Melanie E. Damian,  
Court-Appointed Receiver*

Melanie E. Damian, Esq., as Receiver  
DAMIAN & VALORI, LLP  
1000 Brickell Avenue, Suite 1020  
Miami, Florida 33131

## STANDARDIZED FUND ACCOUNTING REPORT

CIVIL – RECEIVERSHIP FUND FOR SEC v. TODAY'S GROWTH CONSULTANT, INC, ET AL.

Reporting Period 4/1/2024 to 6/30/2024

		Detail	Subtotal	Grand Total
<b>Line 1</b>	Beginning Balance (As of 4/1/2024):	\$ -	\$ -	<b>\$1,805,483.39</b>
	<b>Increases in Fund Balance:</b>			
<b>Line 2</b>	Business Income	\$ -	\$ -	\$ -
<b>Line 3</b>	Cash and Securities [1]	\$ 88,603.00	\$ 88,603.00	\$ 88,603.00
<b>Line 4</b>	Interest/Dividend Income [1]	\$ 2,151.74	\$ 2,151.74	\$ 2,151.74
<b>Line 5</b>	Business Asset Liquidation		\$ -	\$ -
<b>Line 6</b>	Personal Asset Liquidation	\$ -	\$ -	\$ -
<b>Line 7</b>	Third-Party Litigation Income	\$ -	\$ -	\$ -
<b>Line 8</b>	Miscellaneous - Other	\$ -	\$ -	\$ -
	<b>Total Funds Available</b>			<b>\$ 1,896,238.13</b>
	<b>(Lines 1-8):</b>			
	<b>Decreases in Fund Balance:</b>			
<b>Line 9</b>	Disbursements to Investors [1]	\$ 211,099.99	\$ 211,099.99	\$ 211,099.99
<b>Line 10</b>	Disbursements for Business Operations [1]	\$ 6,395.74	\$ 6,395.74	\$ 6,395.74
Line 10a	Disbursements to Receiver or Other Professionals - Contingency Fee Arrangement per Court Order dated November 5, 2020 [ECF No. 103]	\$ 377,219.06	\$ 377,219.06	\$ 377,219.06
Line 10b	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
Line 10c	Personal Asset Expenses:	\$ -	\$ -	\$ -
Line 10d	Investment Expenses	\$ -	\$ -	\$ -
Line 10e	Third-Party Litigation	\$ -	\$ -	\$ -
Line 10f	Tax Administrator Fees and Bonds	\$ -	\$ -	\$ -
Line 10g	Federal and State Tax Payments	\$ -	\$ -	\$ -
	<b>Total Disbursements for Receivership Operations</b>			<b>\$ 594,714.79</b>
<b>Line 11</b>	Disbursements for Distribution Expenses Paid by the Fund:	\$ -	\$ -	\$ -
Line 11a	Distribution Plan Development Expenses:	\$ -	\$ -	\$ -

Line 11b	Distribution Plan Implementation Expenses:	\$ -	\$ -	\$ -
<b>Line 12</b>	<b>Disbursements to Court/Other</b>	\$ -	\$ -	\$ -
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$ -	\$ -	\$ -
Line 12b	Federal Tax Payments	\$ -	\$ -	\$ -
	<b>Total Disbursements to Court/Other</b>			
	<b>Total Funds Disbursed (Lines 9-11)</b>			\$ 594,714.79
<b>Line 13</b>	<b>Ending Balance (As of June 30, 2024)</b>			\$ 1,301,523.34
<b>Line 14</b>	<b>Ending Balance of Fund – Net Assets:</b>			
Line 14a	Cash & Cash Equivalents			\$ 1,301,523.34
Line 14b	Investments			\$ -
Line 14c	Other Assets or Uncleared Funds			
	<b>Total Ending Balance of Fund – Net Assets</b>			\$ 1,301,523.34

[1] Funds were received into the Receivership accounts for Today's Growth Consultant, Inc at City National Bank. See Receipts attached hereto as Exhibit 1.

[1] Funds were disbursed to administer the receivership estate and its assets. See Expenses attached hereto as Exhibit 1.

Respectfully submitted,

Damian & Valori LLP  
1000 Brickell Avenue, Suite 1020  
Miami, Florida 33131  
Telephone: 305-371-3960  
Facsimile: 305-371-3965

/s/ Melanie E. Damian  
Melanie E. Damian  
Court-Appointed Receiver

**Attachment 1 to Exhibit A to Receiver's Report****Sec v. Today's Growth Consultant, et al. - Receipts of Fiduciary Account**

<b>Date</b>	<b>From</b>	<b>Amount</b>
4/2/2024	Sheet Music	\$ 107.59
5/23/2024	AFK Fundkite	\$ 35,000.00
5/28/2024	Fox Capital	\$ 50,000.00
5/29/2024	Quin Street	\$ 3,495.41
Total		\$ 88,603.00

**City National Bank Interest**

<b>Date</b>	<b>Explanation</b>	<b>Amount</b>
4/30/2024	interest	\$ 20.99
5/31/2024	interest	\$ 19.22
6/30/2024	interest	\$ 2,104.11
6/30/2024	interest	\$ 7.42
Total		\$ 2,151.74
<b>GRAND TOTAL OF RECEIPTS</b>		<b>\$ 90,754.74</b>

**Sec v. Today's Growth Consultant, et al. - Expenses of Fiduciary Account**

<b>Date</b>	<b>Payable</b>	<b>Amount</b>
4/10/2024	Teris	\$ 6,383.74
4/12/2024	Return heck fee	\$ 12.00
Total		\$ 6,395.74

**Late Claims Distribution**

<b>Date</b>	<b>Payable</b>	<b>Amount</b>
5/20/2024	Late Claimants	\$ 2,808.15
5/20/2024	Late Claimants	\$ 12,077.60
5/20/2024	Late Claimants	\$ 13,866.80
5/20/2024	Late Claimants	\$ 19,332.80
5/20/2024	Late Claimants	\$ 39,760.00
5/20/2024	Late Claimants	\$ 25,471.25
5/20/2024	Late Claimants	\$ 6,958.00
5/20/2024	Late Claimants	\$ 9,741.20
5/20/2024	Late Claimants	\$ 5,376.35
5/20/2024	Late Claimants	\$ 19,568.88
5/20/2024	Late Claimants	\$ 9,691.50
5/20/2024	Late Claimants	\$ 8,824.24
5/20/2024	Late Claimants	\$ 5,019.52
5/20/2024	Late Claimants	\$ 26,639.70
5/20/2024	Claimant Duplicate check	\$ 5,964.00 *
Total Distribution		\$ 211,099.99

\*Receivership will be receiving credit from City National Bank for duplicate check cashed

**Professional Fee**

<b>Date</b>	<b>Payable</b>	<b>Amount</b>	
4/10/2024	Damian Valori Culmo	\$ 317,967.61	Smith Amundsen
5/24/2024	Damian Valori Culmo	\$ 52,352.84	Cody Neer Fees
5/24/2024	Damian Valori Culmo	\$ 1,584.00	Cody Neer Costs
5/22/2024	Kapila Mukamal	\$ 5,314.61	Cody Neer
Total professional fees		\$ 377,219.06	
<b>GRAND TOTAL EXPENSES</b>		<b>\$ 594,714.79</b>	