

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

SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	Civil Action No. 1:19-CV-08454
TODAYS GROWTH CONSULTANT INC.	:	
(dba THE INCOME STORE)	:	
	:	
and	:	
	:	
KENNETH D. COURTRIGHT, III,	:	
	:	
Defendants.	:	
	:	

RECEIVER’S NINETEENTH STATUS REPORT

Melanie E. Damian, the court-appointed receiver (“Receiver”) in the above-captioned enforcement action (“SEC Enforcement Action”), submits her nineteenth 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 July 1, 2024, through September 30, 2024 (the “Reporting Period”).

TABLE OF CONTENTS

I.	INTRODUCTION	3
II.	PROCEDURAL BACKGROUND.....	4
III.	STATUS AND ACTIVITIES OF THE RECEIVERSHIP	5
	A. <i>The Court-Approved Claims Process and Responding to Investor Inquiries</i>	5
	B. <i>Pursuing Recovery Claims Against Third Parties, Affiliates, Insiders, Professionals and Financial Institutions</i>	8
	C. <i>Assistance of Receiver’s Forensic Accountant and Tax Consultant</i>	10
IV.	ESTATE’S CASH ON HAND, EXPENSES, AND DISBURSEMENTS.....	10
V.	KNOWN PROPERTY OF THE RECEIVERSHIP ESTATE.....	11
VI.	KNOWN CREDITORS OF THE RECEIVERSHIP ESTATE	12
VII.	RECOMMENDATION FOR CONTINUATION OF RECEIVERSHIP AND CONCLUSION.....	12

I. INTRODUCTION

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

Specifically, the Receiver pursued claims to recover funds that Defendant Today's Growth Consultant Inc. ("TGC") had improperly transferred to various third-parties, insiders, and affiliates of the Defendants, financial institutions and entities that facilitated the fraud that is the subject of the SEC Enforcement Action, and the professionals whose negligence caused damages to TGC and its creditors, including the defrauded investors. 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 distributing 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 the Court's 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. The Court granted that Motion, and the Receiver made the

approved distributions. During this Reporting Period, the Receiver assisted claimants with lost checks and changes of payee information by reissuing their distributions as needed.

Also during the Reporting Period, the Receiver continued to litigate the Estate's claims against the four remaining merchant cash advance companies ("MCAs") which had not settled or consented to judgments, awaiting the Court's ruling on the Receiver's unopposed motions for summary judgment and to strike the MCAs' experts. Further, in the only other remaining litigation, after the Reporting Period, the Court entered findings of fact and conclusions of law, determining that more than half of the payments that William Courtright and his company Courtright Consulting, Inc. received from TGC were voidable fraudulent transfers and directing the parties to submit a proposed Final Judgment.

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.

The Receiver's status reports have 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. 45, 81, 101, 115, 127, 160, 172, 184, 202, 220, 233, 242 (supplementing 233), 247, 265, 292, 303, 311, 321 and 329.

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:

- (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) resending the initial distributions to claimants who did not receive or could not deposit the distribution checks; and
- (C) continuing to litigate pending recovery actions against four MCAs, and awaiting entry of the Court's findings of fact and conclusions of law on the Receiver's claims against William Courtright and his company Courtright Consulting, Inc. following the trial in January 2024.

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@dvllp.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.¹ 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 prior 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

¹ 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.

claimants with allowed late claims and amended claims, as provided in Exhibit A to that Motion [ECF No. 318-1].

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 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, only one initial distribution check remained uncashed and the Receiver is working to locate that claimant. The Receiver also processed a late monetary claim for a claimant with a net loss of \$10,911 because this claimant required assistance understanding the claims process and did not request the appropriate relief. The Receiver believes she should allow this late claim and will ask the Court to approve this claim in her motion to approve the final distribution to all claimants.

Also 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 and 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) an uncashed check, (iv) the transfer of one website and associated social media accounts to a claimant who had opted to receive the website in the claims process, and (v) the status of 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 await the Courts' rulings on dispositive motions and following the bench trial in 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 MCAs that TGC had utilized and the action against William Courtright, the brother of Courtright and an insider of TGC, along with William Courtright's company.²

In particular, in the action against the MCAs, Case No. 1:21-cv-01792 (the "MCA Recovery Action"), pending in this District, the Receiver continued to await the Court's rulings on the Receiver's unopposed motion for summary judgment against four MCAs (EIN Cap, Inc., BMF Capital, LLC, World Global Capital, LLC, and FundKite, LLC) and the Receiver's unopposed motion to strike those MCAs' purported experts, and the Court denied without prejudice the Receiver's motion to strike pleadings of the MCAs in view of the other pending motions. *See* Case No. 1:21-cv-01792 at ECF Nos. 136, 171, 172, and 186. The Receiver's claims against the other four MCAs were resolved during prior reporting periods through settlement agreements and consent final judgments, two of those MCAs (AKF, Inc. and Fox Capital Group, Inc.) paid a total of \$85,000 pursuant to Court-approved settlements, and Consent Final Judgments were entered against the other two MCA, including Defendants Alpha Capital Source, Inc. in the amount of \$118,770 and High Five Capital Group, LLC in the amount of \$1,090,494, representing the full

² 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.

amounts of the net gains they had received from TGC. *See* Case No. 1:21-cv-01792 at ECF Nos. 178 and 179.

In the recovery action against William Courtright and Courtright Consulting, Inc., Case No. 1:21-cv-01694 (the “William Courtright Action”), pending in this District, the Court entered its Findings of Fact and Conclusions of Law. *See id.* at ECF No. 120. The Court determined that all payments that William Courtright and Courtright Consulting, Inc. received from TGC after November 3, 2017, were not received in good faith and, as such, the transfers were fraudulent in violation of the Illinois Uniform Fraudulent Transfer Act and may be recovered by the Receiver. *See id.* The Court then ordered the parties to confer regarding the amount Defendants received from TGC after November 3, 2017, and submit a joint report as to that amount by October 17, 2024. After the Reporting Period, the parties filed the joint report in which the parties agreed to the amount Defendants received after November 3, 2017 (exceeding \$1.3 million), but Defendants presented arguments for why the judgment amount should be less than that amount. The Court requested that the parties brief their disputes as to the amount, after which the Court will enter judgment in favor of the Estate. Upon entry of the judgment, the Receiver will seek to collect the judgment amount from William Courtright and Courtright Consulting, Inc.

Upon the conclusion of these two remaining ancillary actions and reasonable efforts to collect the judgment amounts from the Defendants and/or sell the judgments, the Receiver will seek Court authority to make a final distribution to claimants with allowed claims after payment of the Court-approved outstanding fees and costs of the Receiver and her professionals. Thereafter, the Receiver will file a motion to terminate the receivership and discharge the Receiver.

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

During the Reporting Period, the Receiver's forensic accountant, Kapila Mukamal LLP, provided valuable support to the Receiver in connection with confirming late-filed claims for purposes of the claims process and the initial distribution to allowed claimants.

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

As of the end of the Reporting Period (September 30, 2024), the Estate held a total of \$1,283,832.28 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 Receiver's fiduciary account, attached hereto as **Exhibit A**.³ 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 July 23, 2024, the Receiver filed her Eighteenth Interim Application for an Order Approving and Authorizing Payment of Fees and Expenses of Receiver and Her Professionals [ECF No. 331] (the "18th Fee Application"), seeking approval and payment of certain fees and costs incurred during the second quarter of 2024. On August 27, 2024,

³ During the three-month Reporting Period, the Receiver paid the monthly fees to maintain the Estate's database on the Relativity document management platform for April through August 2024 but was able to negotiate a 50% reduction in the monthly fee for this five-month period.

this Court entered an order granting the 18th Fee Application [ECF No. 336].

During the next reporting period, the Receiver will file her Nineteenth 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 (September 30, 2024), the Receiver was in possession, custody, or control of the following assets of the Receivership Estate:

- \$1,283,832.28 in cash on hand in the Receiver's fiduciary account;
- 6 domain names. As the domain names expire, the Receiver has elected not to renew them in order to save the costs associated with maintaining them, marketing them for sale, and finalizing the sale transactions, all of which are estimated to exceed the value of the domains;
- Claims against EIN Cap, Inc., BMF Capital, LLC, FundKite, LLC, and World Global Capital, LLC, Case No. 21-cv-01792; Venue in the United States District Court for the Northern District of Illinois;
- Forthcoming Judgment 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;
- 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 prior 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 claims against the MCAs, obtain a final judgment against insiders William Courtright and his company, seek to collect on the judgments that are entered in those actions as wells as the judgments entered against other Defendants, and explore the potential sale of any judgments on which collection proves to not be cost-effective to maximize the value of the Estate's assets for

the benefit of the investors and creditors of the Estate. Further, the Receiver proposes to continue her efforts to sell the remaining domains of the Estate that have not expired prior to the sale, make the final distributions to allowed claimants in accordance with the Monetary Distribution Plan, as amended, and any further order of this Court, and move to terminate the receivership and discharge the Receiver.

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 30th day of October 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

Telephone: (305) 371-3960

Facsimile: (305) 371-3965

Email: kmurena@dvllp.com

Counsel for Melanie E. Damian,

Court-Appointed Receiver

General Admission to N.D. Ill.

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 October 30, 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

EXHIBIT A

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 7/1/2024 to 9/30/2024

		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 7/1/2024):	\$ -	\$ -	\$1,301,523.34
	Increases in Fund Balance:			
Line 2	Business Income	\$ -	\$ -	\$ -
Line 3	Cash and Securities [1]	\$ 35,000.00	\$ 35,000.00	\$ 35,000.00
Line 4	Interest/Dividend Income [1]	\$ 11,817.58	\$ 11,817.58	\$ 11,817.58
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Personal Asset Liquidation	\$ -	\$ -	\$ -
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available			\$ 1,348,340.92
	(Lines 1-8):			
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors	\$ -	\$ -	\$ -
Line 10	Disbursements for Business Operations [1]	\$ 15,746.85	\$ 15,746.85	\$ 15,746.85
Line 10a	Disbursements to Receiver or Other Professionals - Contingency Fee Arrangement per Court Order dated November 5, 2020 [ECF No. 103]	\$ 48,761.79	\$ 48,761.79	\$ 48,761.79
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	\$ -	\$ -	\$ -
	Total Disbursements for Receivership Operations			\$ 64,508.64
Line 11	Disbursements for Distribution Expenses Paid by the Fund:	\$ -	\$ -	\$ -
Line 11a	Distribution Plan Development Expenses:	\$ -	\$ -	\$ -

Line 11b	Distribution Plan Implementation Expenses:	\$ -	\$ -	\$ -
Line 12	Disbursements to Court/Other	\$ -	\$ -	\$ -
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$ -	\$ -	\$ -
Line 12b	Federal Tax Payments	\$ -	\$ -	\$ -
	Total Disbursements to Court/Other			
	Total Funds Disbursed (Lines 9-11)			\$ 64,508.64
Line 13	Ending Balance (As of September 30, 2024)			\$ 1,283,832.28
Line 14	Ending Balance of Fund – Net Assets:			
Line 14a	Cash & Cash Equivalents			\$ 1,283,832.28
Line 14b	Investments			\$ -
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund – Net Assets			\$ 1,283,832.28

[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**

Date	From	Amount
7/1/2024	AFK Fundkite	\$ 35,000.00
Total		\$ 35,000.00

City National Bank Interest

Date	Explanation	Amount
7/31/2024	interest	\$ 4,347.34
7/31/2024	interest	\$ 2.14
8/31/2024	interest	\$ 3,867.26
8/31/2024	interest	\$ 1.70
9/30/2024	interest	\$ 3,597.80
9/30/2024	interest	\$ 1.34
Total		\$ 11,817.58
GRAND TOTAL OF RECEIPTS		\$ 46,817.58

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

Date	Payable	Amount	
7/9/2024	Teris	\$ 3,149.37	May-24
7/9/2024	Teris	\$ 3,149.37	Jun-24
8/15/2024	Teris	\$ 3,149.37	Jul-24
8/15/2024	Teris	\$ 3,149.37	Apr-24
9/16/2024	Teris	\$ 3,149.37	Aug-24
Total		\$ 15,746.85	

Professional Fee

8/19/2024	Damian Valori Culmo	\$ 16,500.00	FoxCapital
8/19/2024	Damian Valori Culmo	\$ 23,100.00	AKF Settlement
8/19/2024	Kapila Mukamal	\$ 4,020.00	Fox Capital/AKF
9/3/2024	Rachlis Duff & Peel LLC	\$ 256.80	thru 12/31/23
9/3/2024	Kapila Mukamal	\$ 1,169.02	thru 12/31/23
9/3/2024	Rachlis Duff & Peel LLC	\$ 223.20	thru 3/31/24
9/3/2024	Kapila Mukamal	\$ 3,492.77	thru 3/31/24
Total professional fees		\$ 48,761.79	

GRAND TOTAL EXPENSES **\$ 64,508.64**