

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

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

**RECEIVER’S ELEVENTH STATUS REPORT**

Melanie E. Damian, the court-appointed receiver (“Receiver”) in the above-captioned enforcement action (“SEC Enforcement Action”), submits her eleventh status report concerning the status of the Receivership, established pursuant to the Court’s Temporary Restraining Order Freezing Assets and Imposing Other Emergency Relief [ECF No. 20] (“TRO”) and Order Appointing Receiver (“Appointment Order”) [ECF No. 19]. This interim report sets forth the Receiver’s activities and efforts to fulfill her duties under the Appointment Order for the period from July 1, 2022 through September 30, 2022 (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, including her lead counsel, local counsel, and forensic accountants, has worked diligently to continue to fulfill her duties and obligations as set forth in the Appointment Order and to preserve the assets and records of the Receivership Estate (“Receivership Estate” or “Estate”). In particular, the Receiver took control of all known assets of Defendant Today’s Growth Consultant d/b/a The Income Store (“TGC”), including but not limited to the many websites and domains owned by TGC, its business operations, and all other known assets. And the Receiver worked on identifying and marshaling all other assets of TGC, including without limitation funds held in bank accounts, funds transferred to or in the possession of third parties, and other personal property of TGC. The Receiver and her counsel also communicated with investors and answered inquiries regarding, among other things, the status of the SEC Enforcement Action, the Court-approved claims process and timing of initial investor distributions, the results of the sales of TGC’s websites, domains and related digital assets, and the Receiver’s efforts to recover assets from third-parties, insiders, and affiliates for the benefit of the Estate.

During the Reporting Period, the Receiver worked to reduce the Estate’s monthly operating expenses to more efficiently administer and preserve the value of the Estate. To achieve this, the Receiver, among other things, reduced and eliminated unnecessary data storage costs and third-party subscription services associated with data hosting and domain renewal.

During the Reporting Period, the Receiver worked to transfer the few remaining digital assets associated with the websites and domains the Estate had sold during a prior reporting period. And, the Receiver continued to utilize the online digital asset broker, Afternic, to market for sale the remaining domains of the Estate.

Further, during the Reporting Period, the Receiver's counsel continued to respond to requests for documents and access to TGC records from counsel for Courtright in the criminal action against Courtright, attended hearings in that action to provide updates to the Court, and worked with the Receiver's IT vendors to provide copies of forensic images of certain hard drives not maintained on Relativity.

Finally, the Receiver continued to litigate the Estate's claims against third-parties, insiders, and affiliates of the Defendants who had improperly received significant recoverable transfers from TGC without providing reasonably equivalent value in exchange therefor and/or facilitated and assisted TGC and its principal Defendant Kenneth D. Courtright, III ("Courtright"). In particular, the Receiver continued to advance the recovery actions, engage in discovery, and pursue expeditious resolutions of the Receiver's claims. During the Reporting Period the Receiver resolved one such claim, which is pending approval by this Court.

## **II. PROCEDURAL BACKGROUND**

The Appointment Order entered on December 30, 2019, among other things, 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* ECF 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 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.

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<sup>1</sup> Indeed, since her appointment, the Receiver has 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.

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 and pursue claims of the Estate. *See* ECF Nos. 81, 101, 115, 127, 160, 172, 184, 202, 220.

### **III. STATUS AND ACTIVITIES OF THE RECEIVERSHIP AND SUMMARY OF TGC'S OPERATIONS**

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

- (A) maintaining, reducing expenses for, and marketing for sale remaining digital assets of the Estate, transferring social media accounts related to websites to purchasers, and resolving issues with certain transferred digital assets;
- (B) responding to inquiries from, and addressing issues raised by, investors who participated in the Court-approved claims process regarding the digital assets they received in lieu of monetary distributions and/or the status of the SEC Enforcement Action and the Receivership;
- (C) continuing to litigate pending recovery actions against third-parties, insiders, and affiliates 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;
- (D) engaging in preliminary settlement negotiations with TGC's former attorneys and accountants in an attempt to resolve the Estate's claims and finalizing and filing the Receiver's Complaint against those former professionals with whom a settlement could not be reached;
- (E) working with her forensic accountant to analyze the reconstructions of accounts of TGC and perform damages calculations to support the Receiver's claims against third parties; and
- (F) working with IT professionals to provide access to the Estate's Relativity databases of TGC records and copies of forensic images of other TGC records to Defendant Courtright in response to his requests

in the pending criminal matter, *United States of America v. Kenneth D. Courtright*, Case No. 20-CR-77.

***A. Maintaining, Reducing Expenses, and Marketing for Sale Remaining Assets of the Estate, Transferring Assets Related to Websites to Purchasers, and Resolving Issues with Certain Transferred Digital Assets***

During the Reporting Period, to reduce monthly operating expenses, the Receiver and her counsel continued to maintain and market for sale the Estate's remaining digital assets and worked to finalize the transfer of domains that previously experienced errors while also searching TGC's preserved data for related content including social media accounts to transfer same to buyers. The Receiver continued to reduce monthly operational costs by discontinuing payment for ownership renewal fees associated with the Estate's remaining domains given that their value is less than the renewal fees.

As previously reported, the Receiver listed for sale and sold additional domains through the third-party broker service, Afternic. During the Reporting Period, the Receiver continued to monitor and respond to numerous price inquiries regarding the listed domains from potential buyers through the Afternic service, and the Receiver re-evaluated and strategically set individual prices for each domain utilizing valuation resources provided by digital asset experts.

The Receiver and her professionals also worked on finalizing the transfer of any remaining domains and related content including related social media accounts to buyers, addressing issues that arose in connection with such transfers to the buyers, and further reducing costs by discontinuing any unnecessary data preservation and cloud storage services formerly associated with hosting TGC's emails and cloud data.

***B. Responding to Investor Inquiries Regarding Court-Approved Claims Process***

As previously reported, in accordance 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@dvlip.com](mailto:IncomeStoreClaims@dvlip.com)).

As previously reported, pursuant to her final determinations of investor claims, the Receiver approved claims for monetary distributions to investors totaling approximately \$70,128,469.32, to former employees totaling approximately \$12,780.60, and to creditors totaling approximately \$1,118,248.04 (\$760,552.17 of which is subordinated to the claims of investors pursuant to an agreed order). Of the 472 claims from investors, 33 investors elected to receive one or more of the websites that TGC had assigned to them and forfeit their right to monetary distributions from the Estate. Pursuant to the approval of these claims, the Receiver transferred 69 websites to the 33 investors and satisfied \$7,890,102.70 in monetary claims against the Estate.

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@dvlip.com](mailto:IncomeStore@dvlip.com) and [IncomeStoreClaims@dvlip.com](mailto:IncomeStoreClaims@dvlip.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 status and timing of the eventual monetary

distributions, (ii) updated investor contact information, (iii) transferring websites, domains, and corresponding social media channels to investors pursuant to their elections to received same in lieu of monetary distributions in the claims process, (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.

***C. Pursuing Recovery Claims Against Third Parties, Affiliates, and Insiders***

During the Reporting Period, the Receiver and her counsel continued to pursue the Estate's claims against third-parties, affiliates, and insiders, including gathering evidence to support those claims and litigating the actions commenced during prior reporting periods, including conducting discovery and working with her retained expert to finalize and serve expert witness reports in accordance with applicable pre-trial scheduling orders.<sup>2</sup> During the Reporting Period, the Receiver received the final installment settlement payment from a party with whom the Receiver had previously reached a resolution of the Estate's claims. *See* Standardized Fund Accounting Report, reflecting receipts and disbursements of the Estate, attached as **Exhibit A**.

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<sup>2</sup> As detailed in the Receiver's prior Status Reports, to preserve the minimal funds in the Receivership Estate, 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. Additionally, pursuant to the parties' Stipulation and Order Concerning the Receiver's Payment of Expenses in the Ancillary Actions [ECF No. 228], the fees and expenses of the Receiver and Lead Counsel incurred in administering the Estate will not be paid from the net recoveries in the contingency fee cases until the conclusion of the receivership when, as part of the Receiver's final accounting, the Receiver will seek payment and reimbursement from the Estate of all outstanding fees and costs of the Receiver and her professionals (including all fees held back since the inception of the receivership), subject to a cost benefit analysis and final review by the SEC and the Court.

Finally, during the Reporting Period, the Receiver and her counsel continued to work with third-parties, affiliates, and insiders to investigate each of their involvements with TGC and/or Courtright and to evaluate their ability to assist the Receiver in her pursuit of claims against other third-parties, affiliates, and insiders who received significant transfers from TGC and/or facilitated the fraud perpetrated by TGC and Courtright.

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

During the initial reporting period, the Receiver retained Kapila Mukamal ("Kapila") as her forensic accountant and tax consultant to assist her to fulfill 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 both the enforcement action as the Receiver's retained forensic accountant and tax consultant as well as critically important advice and analysis as the Receiver's retained expert witness<sup>3</sup> in the Estate's recovery actions against former professionals, third-parties, insiders, and affiliates ("Ancillary Actions"). In particular, Kapila completed a Ponzi analysis of TGC's operations and documented its findings in expert witness reports that the Receiver has disclosed in certain of the Estate's Ancillary Actions so the Receiver can invoke the Ponzi presumption shifting the burden of proof in the actual fraudulent transfer claims. Further, during prior reporting periods, Kapila performed

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<sup>3</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, LLP 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. ECF No. 228.

a tracing analysis of investor funds in and out of TGC's accounts and an analysis of the commingling of investor funds with website revenues during the varying time periods relevant to each Ancillary Action, prepared multiple damages models and calculations for the Receiver's Ancillary Actions, and assisted the Receiver to analyze TGC's accounting files and formulate and initiate her claims against third-parties. All such work substantially assisted the Receiver in pursuing her claims in the Ancillary Actions during the Reporting Period.

#### ***E. Courtright's Criminal Proceeding***

During the Reporting Period, the Receiver received requests from Courtright's counsel in the criminal proceeding styled *United States of America v. Kenneth D. Courtright*, Case No. 20-CR-77 to produce copies of certain of TGC's documents and data which the Receiver forensically imaged and preserved after her appointment. The Receiver's counsel attended status hearings in the criminal proceeding to discuss Courtright's requests and the procedure and timing for providing copies of TGC's records while ensuring, consistent with the Court's ruling, that the Estate is not required to bear the financial burden of the document and access requests. And, the Receiver's counsel worked with the Receiver's IT professionals to provide copies of forensically imaged hard drives to Courtright's counsel.<sup>4</sup>

#### **IV. CASH ON HAND AND ACCRUED EXPENSES OF ESTATE**

As of the end of the Reporting Period (September 30, 2022), the Estate held a total of \$429,624.92 in cash on hand, comprising, among other things, the net proceeds of the sale of the Estate's digital assets, funds generated from TGC's business operations (including residual website revenue deposited in TGC's operating accounts), and settlement funds received from third-parties, insiders, and affiliates against whom the Receiver pursued fraudulent transfer claims. *See*

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<sup>4</sup> The IT professionals continue to issue invoices directly to Courtright's counsel.

Exhibit A. The Receiver deposited such funds in her fiduciary account for the Receivership Estate at City National Bank in Miami, Florida.

During the Reporting Period, the Receivership Estate incurred administrative expenses in the form of fees and costs of the Receiver and her professionals for the work they performed in connection with fulfilling the Receiver's duties under the Court's Orders. On March 2, 2022, the Court 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. The Receiver's future fee applications, including the application associated with the Receiver and her professionals' administrative fees and costs through the third quarter of 2022, will conform with the procedures set forth in the parties' Stipulation.

#### **V. DISBURSEMENTS OF ESTATE**

During the Reporting Period, the Receiver made disbursements from TGC's operating accounts for expenses necessary to preserve and maintain data related to TGC's former operations. Such expenses included operating the business in a limited capacity including reduced expenses associated with data preservation which were further reduced during the Reporting Period by eliminating charges related to hosting TGC data on Google. *See* Exhibit A. The Receiver further made payments to data hosting professionals to assist in preserving, copying, and producing data and documents to opposing parties in the Receiver's actions against third-parties, insiders, and affiliates.

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

As of the end of the Reporting Period (June 30, 2022), the Receiver was in possession,

custody or control of the following assets of the Receivership Estate:

- \$429,624.92 in cash on hand in the Receiver's fiduciary account and TGC's operating accounts.
- Fewer than 2,000 domain names comprising the remaining digital assets of the Estate (precise value currently unknown).
- Trademarks (precise value currently unknown)
- Claims and Judgments against third-parties, insiders, and affiliates (precise value currently unknown, however, in total the Receiver seeks approximately \$35 million) for fraudulent transfers, aiding and abetting fraud and breach of fiduciary duty, and malpractice, including the following:
  - Claims against Heartland Bank & Trust Company; Case No. 1:20-cv-07819; Venue in the United States District Court for the Northern District of Illinois;
  - 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 Messiah Lutheran Church; Case No. 1:20-cv-07817; Venue in the United States District Court for the Northern District of Illinois;
  - Claims against Pepperdine University; Case No. 1:21-cv-02371; Venue in the United States District Court for the Northern District of Illinois;
  - Claims against 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.; Case No. 21-cv-01792; Venue in the United States District Court for the Northern District of Illinois;
  - Claims against Cody Neer; Case No. 8:21-cv-1999; Venue in the United States District Court for the Middle District of Florida, Tampa Division;
  - Claims against SmithAmundsen, LLC; Case No. 1:22-cv-02830; Venue in the United States District Court for the Northern District of Illinois;

- Settlement with the Law Office of Michael Polacheck, Ltd.; the Receiver entered into a settlement of the Estate's claim against The Law Office of Michael Polacheck, Ltd. (\$974,094.00);
  - On September 27, 2022, the Receiver filed her motion to approve such settlement, *see* ECF No. 231, which is pending this Court's ruling;
- Claims against Core Financial; Case No. 1:22-cv-4671; Venue in the United States District Court for the Northern District of Illinois;
- Judgment against Legacy Families in the amount of \$154,038.50; and
- Judgment against JDS Consulting in the amount of \$121,409.65

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

As detailed above, 472 investors, 8 creditors, and 9 former employees submitted claims in the claims process, and the Receiver allowed \$70,128,469.32 in investor claims, \$1,118,248.04 in creditor claims, and \$12,780.60 in employee claims. Of the 472 claims from investors, 33 investors elected to receive one or more of the websites that TGC had assigned to them and forfeit their right to monetary distributions from the Estate. Pursuant to the approval of these claims, the Receiver transferred 69 websites to the 33 investors and satisfied \$7,890,102.70 in monetary claims against the Estate.

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

The Receiver recommends the Receivership continue so she may continue to litigate to conclusion the Estate's claims against third-parties, insiders, affiliates, and former professionals, preserve and maximize the value of the Estate's assets for the benefit of the investors and creditors of the Estate, finalize the transfer of the digital assets purchased by buyers, conclude the claims process, and propose a distribution plan and implement any plan the Court may approve. Until further order of the Court, the Receiver will continue to work with her team of professionals to

locate, marshal, and preserve all known and potential assets of the Estate in accordance with the Appointment Order. The Receiver will also continue to investigate and gather information regarding the Estate's assets and potential claims against third-parties, insiders, and affiliates through subpoenas, depositions, and other inquiries to financial institutions, and other entities and persons with any connection to the Defendants and other sources of recovery for the Estate.

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

Respectfully submitted this 31st day of October, 2022.

Respectfully submitted,

/s/ Kenneth Dante Murena

Kenneth Dante Murena, Esq.

Florida Bar No. 147486

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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 October 31, 2022 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 7/1/2022 to 9/30/2022

		Detail	Subtotal	Grand Total
<b>Line 1</b>	Beginning Balance (As of 7/1/2022):	\$ -	\$ -	<b>\$463,405.12</b>
	<b>Increases in Fund Balance:</b>			
<b>Line 2</b>	Business Income	\$ -	\$ -	\$ -
<b>Line 3</b>	Cash and Securities [1]	\$ 15,758.92	\$ 15,758.92	\$ 15,758.92
<b>Line 4</b>	Interest/Dividend Income [1]	\$ 16.88	\$ 16.88	\$ 16.88
<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 (Lines 1-8):</b>			<b>\$ 479,180.92</b>
	<b>Decreases in Fund Balance:</b>			
<b>Line 9</b>	Disbursements to Investors			
<b>Line 10</b>	Disbursements for Business Operations [2]	\$ 28,470.98	\$ 28,470.98	\$ 28,470.98
Line 10a	Disbursements to Receiver or Other Professionals - Contingency Fee Arrangement per Court Order dated November 5, 2020 [ECF No. 103]	\$ 18,657.00	\$ 18,657.00	\$ 18,657.00
Line 10b	Disbursements to Receiver or Other Professionals [2]	\$ 2,428.02	\$ 2,428.02	\$ 2,428.02
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>\$ 49,556.00</b>
<b>Line 11</b>	Disbursements for Distribution Expenses Paid by the Fund:	\$ -	\$ -	\$ -
Line 11a	Distribution Plan Development Expenses:	\$ -	\$ -	\$ -

**EXHIBIT A**

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>			\$ 49,556.00
<b>Line 13</b>	<b>Ending Balance (As of September 30, 2022)</b>			\$ 429,624.92
<b>Line 14</b>	<b>Ending Balance of Fund – Net Assets:</b>			
Line 14a	Cash & Cash Equivalents			\$ 429,624.92
Line 14b	Investments			\$ -
Line 14c	Other Assets or Uncleared Funds			
	<b>Total Ending Balance of Fund – Net Assets</b>			\$ 429,624.92

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

[2] Funds were disbursed to administer the receivership estate and its assets. See Expenses attached hereto as Exhibit 2.

Respectfully submitted,

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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 of Check</b>	<b>Check #</b>	<b>Amount</b>	<b>From</b>
7/27/2022		\$ 420.71	Ebay/Sale of computer
8/4/2022		\$ 393.40	Ebay/Sale of computer
8/4/2022		\$ 1,474.51	PNC
8/15/2022		\$ 10,000.00	Sutton Funding
9/30/2022		\$ 3,470.30	PNC
		\$ 15,758.92	

**City National Bank Interest**

<b>Date</b>	<b>Explanation</b>	<b>Amount</b>
7/31/2022	interest	\$ 5.49
8/31/2022	interest	\$ 6.05
9/30/2022	interest	\$ 5.34
Total		\$ 16.88

**Attachment 2 to Exhibit A to Receiver's Report****Sec v. Today's Growth Consultant, et al. - Expenses of Fiduciary Account**

<b>Date</b>	<b>Payable</b>	<b>Amount</b>	<b>Description</b>	
7/4/2022	Google	\$ 604.20		
7/4/2022	Google	\$ 28.94		
7/21/2022	Teris	\$ 6,609.00	May Inv # 6987	1591
7/21/2022	Teris	\$ 6,617.00	June Inv # 7203	1592
8/4/2022	Google	\$ 604.20		
8/4/2022	Google	\$ 30.14		
8/10/2022	Teris	\$ 6,726.00	July Inv #7285	1593
9/4/2022	Google	\$ 604.20		
9/4/2022	Google	\$ 6.30		
9/19/2022	Teris	\$ 6,641.00	August Inv # 7439	
Total operating expenses		\$ 28,470.98		

**Professional Fee Contingency Fee Schedule**

<b>Matter</b>	<b>Settlement Amt</b>	<b>DVLLP @ 33%</b>	<b>Costs</b>	<b>Total DVLLP</b>
Sutton funding	\$55,000.00	\$ 18,150.00	\$ 507.00	\$ 18,657.00

**Professional Fee DE 229 9/2/22**

9/2/2022	Rachlis Duff & Peel	\$ 1,398.40	3/31/2022	1594
9/2/2022	Kapila Mukamal	\$ 1,029.62	3/31/2022	1595
Total professional fees		\$ 2,428.02		

**GRAND TOTAL EXPENSES** \$ **49,556.00**