

**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 SEVENTEENTH STATUS REPORT

Melanie E. Damian, the court-appointed receiver (“Receiver”) in the above-captioned enforcement action (“SEC Enforcement Action”), submits her seventeenth 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 January 1, 2024, through March 31, 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* investigated and litigated the Estate's claims against third-parties, insiders, and affiliates of the Defendants who had improperly received significant recoverable transfers from TGC and/or aided and abetted Courtright in the TGC scheme and claims against former professionals of TGC. To date, the Receiver recovered nearly \$13.5 million from those third-parties, insiders, and affiliates.

As a result of those and other recoveries by the Receiver, on or around December 5, 2023, the Estate made the Court-approved initial monetary distribution exceeding \$7 million, 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. That Motion is unopposed and pending before this Court.

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.¹ *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 second 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 and pursue claims of the Estate and distribute the assets 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 and 311.

III. STATUS AND ACTIVITIES OF THE RECEIVERSHIP

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:

¹ 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) responding to inquiries from potential claimants seeking to file late claims and amend claims, reviewing and approving those claims and seeking to amend the monetary distribution plan to allow those claimants to participate in the Court-approved initial distribution;
- (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; and
- (D) working with her forensic accountant to analyze the reconstructions of accounts of TGC and perform damages calculations and other analyses to support the Receiver's claims against third parties, insiders, and affiliates of TGC and to provide such information in connection with the criminal sentencing 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).

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.² At the end of the prior reporting period, the Estate made the initial monetary distribution by sending \$7,193,181.48 to claimants (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 Receiver's office processed an additional 15 late-filed and/or amended claims against the Estate, totaling \$2,280,581.46. The Receiver filed her Motion to Amend Court-Approved Monetary Distribution Plan [ECF No. 318], which is unopposed and awaiting a ruling from this Court. The Receiver proposes to make the same 9.94% initial distribution to 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 spent significant time 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

² 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.

distributions back into their IRAs. At the time this Report was filed, approximately 11 checks totaling \$132,432.06 remained uncashed, and the Receiver is following up with those claimants by email and telephone to assist with depositing the checks. 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 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) 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 Third-Parties, Affiliates, Insiders, and Professionals

During the Reporting Period, the Receiver and her counsel continued to litigate the Estate's actions against third parties, affiliates, and insiders, commenced during prior reporting periods,

including by conducting discovery, participating in mediation and settlement negotiations, and preparing for trial in accordance with applicable scheduling orders.³

During the prior reporting period, the Court presiding over the Receiver's action against defendants Cody Neer and his company Bucks of America, Inc. entered a judgment for \$153,000 plus post-judgment interest against those defendants and in favor of the Estate for recovery of fraudulent transfers. *See* Case No. 8:21-cv-01999, ECF Nos. 86 (Bench Trial Opinion and Order) and 87 (Final Judgment). The Court granted the Receiver's Bill of Costs in part awarding the Estate \$1,584. *See id.* at ECF No. 96. The Receiver recorded the Final Judgment and obtained a judgment lien in favor of the Estate and began her efforts to collect the judgment amount plus interest and the awarded costs. During the Reporting Period, the Receiver collected the full judgment amount plus post-judgment interest, totaling \$158,644.96 and the awarded costs and filed a Satisfaction of Judgment in that action [Case No. 8:21-cv-01999, ECF No. 99].

In addition, the Receiver continued to pursue the Estate's claims for recovery of fraudulent transfers, and aiding and abetting Courtright's fraud and breach of fiduciary duties against certain 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., Case No. 1:21-cv-01792 (the "MCA Recovery Action"), pending in the United States District Court for the Northern District of Illinois. Those defendants provided cash advances to TGC and then improperly swept investor funds, rather than only sweeping TGC's operating receivables, to repay themselves. Because certain

³ 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 had failed to serve verified answers to the Receiver's interrogatories and produce documents responsive to the Receiver's request for production by the Court's extended deadline of September 20, 2023, the Receiver filed a motion to strike the pleadings of all such Defendants, which is ripe for adjudication. *See id.* at ECF No. 136. During the prior reporting period, fact discovery and the Receiver's expert disclosures were completed. Thereafter, the parties engaged in settlement negotiations, and the Receiver and two Defendants reached an agreement pursuant to which a consent judgment would be entered against those Defendants. Then, the Receiver and the remaining Defendants participated in a settlement conference before the Magistrate Judge, after which the Receiver settled with two other Defendants for a monetary sum. As soon as the settlement agreements with those Defendants are fully executed, the Receiver will submit them to this Court for approval. After the Reporting Period, the Receiver continued to engage in settlement discussions with the remaining three Defendants. In the event a settlement is not reached in short order, the Receiver intends to seek summary judgment on all Counts of her Complaint against any non-settling Defendants.

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 the United States District Court for the Northern District of Illinois, seeking to recover the nearly \$2.3 million that TGC paid to those defendants without receiving reasonably equivalent value. The bench trial took place during the Reporting Period, on January 24, 25 and 26, 2024, and the Receiver is preparing her proposed findings of fact and conclusions of law as requested by the trial Court.

Further, during the Reporting Period, this Court approved the Receiver's settlement of the Estate's claims for professional malpractice against SmithAmundsen, LLC, in Case No. 1:22-cv-

02830, pending in the United States District Court for the Northern District of Illinois. *See* ECF No. 310 (Motion to approve settlement) and ECF No. 316 (Order). Thereafter, SmithAmundsen paid the \$900,000 settlement amount to the Estate.

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, serving as the Receiver’s tax consultant, and providing important advice, analysis, and/or trial testimony as the Receiver’s retained expert witness in the MCA Recovery Action and the William Courtright Action.⁴

D. *Courtright’s Criminal Proceeding*

The Receiver continued to monitor Defendant Kenneth D. 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

⁴ 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. *See* ECF No. 228.

worked with the U.S. Attorney's Office to assist in the calculation of restitution owed to Defendant Courtright's victims.

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

As of the end of the Reporting Period (March 31, 2024), the Estate held a total of \$1,805,483.39 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 counsel for 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**. 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 February 14, 2024, the Receiver filed her Sixteenth Interim Application for an Order Approving and Authorizing Payment of Fees and Expenses of Receiver and Her Professionals [ECF No. 313] (the "16th Fee Application"), seeking approval and payment of certain fees and costs incurred during the fourth quarter of 2023. During the Reporting Period, on February 21, 2024, the Court granted the Receiver's 16th Fee Application. *See* ECF No. 315.

During the next reporting period, the Receiver will file her Seventeenth 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 (March 31, 2024), the Receiver was in possession, custody, or control of the following assets of the Receivership Estate:

- \$1,805,483.39 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., 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;
- 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 which were reviewed and 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, which remain outstanding as of this filing.

As explained above, during the Reporting Period, 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. If the Court approves the Receiver's pending, unopposed Motion, the Receiver will distribute \$206,164.90 to those claimants.

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

The Receiver recommends the Receivership continue so she may make distributions on the late and amended claims, litigate to conclusion the Estate's remaining two actions against third-party funders and insider William Courtright, 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 29th day of April 2024.

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 April 29, 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 1/1/2024 to 3/31/2024

		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 1/1/2024):	\$ -	\$ -	\$770,767.31
	Increases in Fund Balance:			
Line 2	Business Income	\$ -	\$ -	\$ -
Line 3	Cash and Securities [1]	\$ 1,060,282.99	\$ 1,060,282.99	\$ 1,060,282.99
Line 4	Interest/Dividend Income [1]	\$ 42.97	\$ 42.97	\$ 42.97
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Personal Asset Liquidation	\$ -	\$ -	\$ -
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available (Lines 1-8):			\$ 1,831,093.27
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors	\$ -	\$ -	\$ -
Line 10	Disbursements for Business Operations [1]	\$ 25,609.88	\$ 25,609.88	\$ 25,609.88
Line 10a	Disbursements to Receiver or Other Professionals - Contingency Fee Arrangement per Court Order dated November 5, 2020 [ECF No. 103]	\$ -	\$ -	\$ -
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			\$ 25,609.88
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)			\$ 25,609.88
Line 13	Ending Balance (As of March 31, 2024)			\$ 1,805,483.39
Line 14	Ending Balance of Fund – Net Assets:			
Line 14a	Cash & Cash Equivalents			\$ 1,805,483.39
Line 14b	Investments			\$ -
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund – Net Assets			\$ 1,805,483.39

[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 of Check	From	Amount
2/1/2024	Sheet Music	\$ 54.03
2/21/2024	Bucks of America	\$ 158,644.96
3/27/2024	Amundsen Davis LLC	\$ 87,792.90
3/28/2024	Cody Neer	\$ 1,584.00
3/28/2024	Axa XL/Amundsen Settlement	\$ 406,103.55
3/29/2024	Argonaut Management/Amundsen Settlement	\$ 406,103.55
Total		\$ 1,060,282.99

Date	Explanation	Amount
1/31/2024	interest	\$ 17.33
2/29/2024	interest	\$ 12.29
3/31/2024	interest	\$ 13.35
Total		\$ 42.97

GRAND TOTAL OF RECEIPTS \$ **1,060,325.96**

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

Date	Payable	Amount
1/1/2024	Teris	\$ 6,383.72
1/12/2024	Teris	\$ 6,383.72
2/14/2024	Teris	\$ 6,383.72
3/13/2024	Secretary of State	\$ 75.00
3/19/2024	Teris	\$ 6,383.72
Total		\$ 25,609.88

GRAND TOTAL EXPENSES \$ **25,609.88**