

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

SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

v. :

TODAY’S GROWTH CONSULTANT, INC. :
(dba THE INCOME STORE) :

and :

KENNETH D. COURTRIGHT, III, :

Defendants. :

Civil Action No. 1:19-CV-08454

**RECEIVER’S NOTICE OF AMENDMENT TO PROPOSED
NOTICING AND CLAIMS ADMINISTRATION PROCESS**

Melanie E. Damian, the court-appointed receiver (“Receiver”) in the above-captioned enforcement action, files this Notice of amendment to one eligibility requirement set forth in the Receiver’s Motion to Approve (a) Noticing and Claims Administration Process and (b) Partial Plan of Distribution [ECF No. 53] (the “Motion”), which the Receiver filed with the Court on February 28, 2020, and states as follows:

In Section B.2. of the section of the Motion describing the proposed noticing and claims process and partial distribution plan and the proposed Legal Notice of Claims Administration Process and Partial Plan of Distribution, the Receiver proposes to only allow the claims of investors or creditors who can demonstrate that, among other things, they were not “employed by or contracted to TGC or Defendant Courtright at any time from December 2009 through December 2019 (the “relevant period”)[.]” *See* ECF No. 53 (Motion) at pp. 8-9; ECF No. 53-1 (Exhibit A)

at p. 3. And the Receiver's proposed Proof of Claim and Release Form requires that claimants represent and certify under oath that they were not "employed by or contracted to TGC or Defendant Courtright" during the relevant period. *See* ECF No. 53-2 (Exhibit B) at p. 12.

With this Notice, the Receiver amends that proposed requirement to provide the Receiver the discretion to allow the claim of an investor or creditor who was employed by or contracted to TGC or Mr. Courtright during the relevant period, as the Receiver, on a case-by-case basis, deems appropriate under the circumstances.

Respectfully submitted this 10th day of March 2020.

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*Counsel for Melanie E. Damian,
Court-Appointed Receiver*

*Counsel for Melanie E. Damian,
Court-Appointed Receiver*

Admitted Pro Hac Vice

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 March 10, 2020 on all counsel or parties who have appeared in the above-styled action.

/s/Kenneth Dante Murena
Kenneth Dante Murena,
*Counsel for Melanie E. Damian,
Court-Appointed Receiver
Admitted Pro Hac Vice*