UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

RECEIVER'S TWENTY-SEVENTH STATUS REPORT

Melanie E. Damian, the court-appointed receiver ("Receiver") in the above-captioned enforcement action ("SEC Enforcement Action"), submits her twenty-seventh 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, 2026, through September 30, 2026 (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, 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 Todays Growth Consultant Inc. ("TGC") had improperly transferred to various third-parties, insiders, and affiliates of the Defendants, including 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 Receiver's sale of TGC's assets, the Estate made the Court-approved initial monetary distributions totaling more than $7.6 million, in addition to distributing over $7.8 million in digital assets to investors.

During this Reporting Period, the Receiver continued searching for buyers for the final judgment for $1,008,311.50 entered against four merchant cash advance companies ("MCAs") (EIN Cap, Inc., BMF Capital, LLC, FundKite, LLC, and World Global Capital, LLC), the final judgments for $1,090,494 and $118,770 against other MCAs (High Five Group, LLC and Alpha Capital Source, Inc.), the final judgments for $154,038.50 and $121,409.65 against other companies associated with TGC, and the final judgment for $1,346,268.05 against William Courtright and his company Courtright Consulting, Inc., entered during earlier reporting periods.[1] During a prior reporting period, William Courtright filed for Chapter 7 bankruptcy protection,

[1] The Receiver's team has made collection efforts on these judgments and determined that the sale of such judgments will maximize the potential recovery for the Estate because collection efforts are too costly.

presumably in an attempt to avoid paying the judgment amount owed to the Receivership Estate. During the Reporting Period, the Receiver continued to participate in that bankruptcy case as the largest creditor of Mr. Courtright by pursuing an adversary proceeding in the bankruptcy court to prevent the discharge of the debt owed to the Estate and to otherwise preserve the Estate's rights and maximize its recovery pursuant to the judgment or the amount for which it can sell the judgment. Specifically, during the Reporting Period, the U.S. Bankruptcy Court in the Northern District of Georgia presiding over Mr. Courtright's bankruptcy case denied the Receiver's Motion for Summary Judgment on her claims to have Mr. Courtright's debt declared non-dischargeable, requiring the Receiver to prove at the trial in the adversary proceeding Mr. Courtright's knowledge of the fraud at the time he received the transfers from TGC. Given the costs of pursuing the adversary proceeding and the time it could take to collect on the judgment after Mr. Courtright's exit from bankruptcy (if the judgment is declared non-dischargeable), the Receiver will seek to settle her claim for a reduced amount or sell her claim (and judgment) to a party willing to take over the adversary proceeding and pursue it to trial.

Further, the Receiver's Illinois Counsel assisted the Receiver in assessing the value of and seeking to transfer to the Courtrights, or otherwise dispose of, various assets of minimal value seized from TGC's Minooka, Illinois office and stored in Illinois Counsel's office. And Illinois Counsel monitored the status of the foreclosure action against certain property of Defendant Courtright.

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. Accordingly, the Receiver hereby files her twenty-seventh status report detailing the status of the receivership during the third quarter of 2026.

III. STATUS AND ACTIVITIES OF THE RECEIVERSHIP

During the Reporting Period, the Receiver, with the assistance of her professionals, continued to fulfill her 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 bankruptcy case filed by William Courtright, and the Receiver's collection efforts; and

(B) seeking to collect on the Final Judgment entered during a prior reporting period in favor of the Receiver and against William Courtright and his company Courtright Consulting, Inc., including pursuing an adversary proceeding in William Courtright's bankruptcy case to maximize the value of that judgment for purposes of collection or sale of the judgment, and exploring the sale of that judgment and the Final Judgments entered in favor of the Receiver and against the MCAs and companies associated with TGC.

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

As previously reported, the Receiver administered a Court-approved Claims Process during which she made final determinations on all claimants' claims for monetary distributions

from the Estate. The Receiver's Amended Monetary Distribution Plan provided for a *pro rata* distribution of funds to claimants holding Allowed Claims totaling $72,357,553.80, providing a 9.94% recovery to those claimants.[2] During a prior reporting period, the Estate made the initial monetary distribution by sending $7,399,346.38 to investors and employee/independent contractors holding Allowed Claims, which included allowed late-filed claims. *See* ECF Nos. 283 (Motion to Amend Monetary Distribution Plan), 283-1 (Exhibit A), and 295 (Order).

The Court approved an additional 15 late-filed and/or amended claims against the Estate, totaling $2,280,581.46. *See* ECF No. 318 (Motion) and ECF No. 325 (Order). The Receiver then made the same 9.94% initial distribution totaling $206,164.90 to those claimants with allowed late claims and amended claims, as provided in Exhibit A to that Motion [ECF No. 318-1]. The Receiver also processed a late monetary claim for a claimant with a net loss of $10,911, and she will ask the Court to approve this claim in her motion to approve the final distribution to all claimants.

During the Reporting Period, the Receiver continued to regularly communicate with investors through the email accounts (IncomeStore@dvllp.com and IncomeStoreClaims@dvllp.com), the telephone number, and the Receivership website, established to provide information to and address the questions and concerns of investors.

[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.

B. Pursuing Collection and Exploring Sale of Judgments Against Merchant Cash Advance Companies, Other Companies Associated with TGC, and Insiders of TGC

During the Reporting Period, the Receiver continued her efforts to locate buyers for the final judgments entered in favor of the Receiver and against several MCAs that TGC had utilized, against other companies associated with TGC, and against William Courtright, the brother of Defendant Courtright and an insider of TGC, along with William Courtright's company.[3]

In a prior reporting period, in the action against the MCAs, Case No. 1:21-cv-01792 (the "MCA Recovery Action"), this District Court entered a final judgment against four MCAs (EIN Cap, Inc., BMF Capital, LLC, World Global Capital, LLC, and FundKite, LLC) for $1,008,311.50 apportioned as follows: $184,853.50 against EIN Cap, Inc., $299,118.00 against World Global Capital, LLC and Fundkite, LLC, and $524,340.00 against BMF Capital, LLC. *See* Case No. 1:21-cv-01792 at ECF Nos. 189 and 190. The Receiver's claims against the other four MCAs were resolved during prior reporting periods through settlement agreements and consent final judgments. Specifically, 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 MCAs, 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 amounts of the net gains they had received from TGC. *See* Case No. 1:21-cv-01792 at ECF Nos. 178 and 179.

[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.

Further, during a prior reporting period, the Receiver obtained judgments against two companies associated with TGC in the U.S. District Court for the Northern District of Illinois, based on the voidable transfers they had received from TGC, including a Final Judgment for $154,038.50 plus interest against Legacy Families and a Final Judgment for $121,409.65 plus interest against JDS Consulting.

During the Reporting Period, the Receiver determined that the sale of the foregoing judgments will likely produce the highest return for the Estate, and her counsel engaged in discussions with potential purchasers of the judgments.

In the recovery action against William Courtright and Courtright Consulting, Inc., Case No. 1:21-cv-01694, the District Court entered a Final Order and Final Judgment, determining that the Receiver may recover $1,346,268.05 from those judgment debtors. *See id.* at ECF Nos.128 and 129. During the Receiver's collection efforts, William Courtright filed for Chapter 7 protection to avoid paying the judgment amount owed to the Receivership Estate. Based on the schedules Mr. Courtright filed in his bankruptcy case, the Estate is his largest creditor by far and will receive most of any funds distributed from the bankruptcy estate. Accordingly, the Receiver has actively participated in Mr. Courtright's bankruptcy case.

First, the Receiver filed an objection to Mr. Courtright's claimed exemption in his residence. At the 341 meeting of creditors during a prior reporting period, the Receiver's counsel discovered that Mr. Courtright had improperly transferred his ownership interest in his residence to his wife after the District Court had determined that he was liable to the Receivership Estate in the Receiver's recovery action against him and his company. The Receiver's counsel brought this fact to the attention of the Chapter 7 Trustee and assisted the Trustee in negotiating a settlement with Mr. Courtright and his wife to transfer the residence to the bankruptcy estate for sale at fair market value by the Trustee. This settlement will ensure that the Receivership Estate receives at

least some distribution from the bankruptcy estate pursuant to the Final Judgment. Indeed, Mr. Courtright will receive only the minimal statutory exemption amount from the sale proceeds, and the remainder will go to the bankruptcy estate for distribution to his creditors. Because the Receivership Estate is by far his largest creditor, it will receive most of the sale proceeds through the bankruptcy estate's distribution.

Second, the Receiver commenced an adversary proceeding in the bankruptcy court by filing a complaint seeking to except from discharge his debt to the Receivership Estate pursuant to the Judgment. The Northern District of Georgia presiding over Mr. Courtright's bankruptcy case denied the Receiver's Motion for Summary Judgment on her claims to have Mr. Courtright's debt declared non-dischargeable, finding that the underlying judgment against him did not establish the requisite fraudulent intent required under the Receiver's Section 523 claims. Thus, the Receiver would have to prove such intent at trial in the adversary proceeding. Given the costs associated with prosecuting this adversary proceeding through trial and the time it could take to collect the judgment amount following his exit from bankruptcy (were the Receiver to prevail at trial), the Receiver believes the best course of action is to seek to settle the Receiver's claims for a reduced amount or sell the judgment to a party interested in prosecuting the Receiver's adversary proceeding through trial.

Upon the conclusion of these efforts to monetize the judgments, the Receiver will seek Court authority to make a final distribution to claimants with allowed claims provided there will be sufficient funds remaining in the Estate 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.

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

As of the end of the Reporting Period (September 30, 2026), the Estate held $1,331,304.49

in cash-on-hand, after distributing more than $15 million in cash and assets to the defrauded investors. *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 is holding such cash-on-hand in her fiduciary account for the Receivership Estate at City National Bank in Miami, Florida.

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. In conformance with these procedures, during the Reporting Period, the Receiver filed her Twenty-Sixth Interim Application for an Order Approving and Authorizing Payment of Fees and Expenses of Receiver and Her Professionals [ECF No. 386] on August 14, 2026, 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 the twenty-sixth reporting period. On August 20, 2026, the Court entered an order granting the Twenty-Sixth Fee Application [ECF No. 388].

V. KNOWN PROPERTY OF THE RECEIVERSHIP ESTATE

As of the end of the Reporting Period (September 30, 2026), the Receiver was in possession, custody, or control of the following assets of the Receivership Estate:

- $1,331,304.49 in cash on hand in the Receiver's fiduciary account;
- 5 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;
- Judgment for $1,008,311.50, plus interest 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;

- Judgment for $1,346,268.05, plus interest 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; and a claim for that amount plus interest in William Courtright's Chapter 7 bankruptcy case;

- Judgment for $1,090,494, plus interest against High Five Group, LLC; Venue in the United States District Court for the Northern District of Illinois

- Judgment for $118,770, plus interest against Alpha Capital Source, Inc.; Venue in the United States District Court for the Northern District of Illinois

- Judgment for $154,038.50, plus interest against Legacy Families; Venue in the United States District Court for the Northern District of Illinois; and

- Judgment for $121,409.65, plus interest against JDS Consulting; Venue in the United States District Court for the Northern District of Illinois.

VI. KNOWN CREDITORS OF THE RECEIVERSHIP ESTATE

As detailed above, the Receiver has allowed claims totaling $74,638,135.30 against the Receivership Estate. Claimants holding allowed claims are comprised of investors, creditors, employees, and independent contractors of TGC that participated in the Receivership Estate's claims process by filing a claim for a monetary distribution and/or for turnover of their digital assets.

During prior reporting periods, the Receiver made an initial distribution to those claimants totaling $7,605,511.28, providing those claimants with a 9.94% recovery, in addition to distributing more than $7.8 million in digital assets to claimants electing turnover of websites, content, and social media pages instead of monetary distribution.

VII. RECOMMENDATION FOR CONTINUATION OF RECEIVERSHIP AND CONCLUSION

The Receiver recommends the Receivership continue so she may complete her efforts to monetize the Estate's judgments against the MCAs, other companies associated with TGC, and William Courtright and his company, including through selling the judgments, seeking to negotiate a settlement with William Courtright regarding the dischargeability of the judgment against him and his company, and receiving a distribution from his bankruptcy estate pursuant to that judgment, to maximize the recovery by the Estate for the benefit of the investors. Further, the Receiver intends to make the final distributions to allowed claimants in accordance with the Monetary Distribution Plan, as amended, and any further order of this Court, after which she will 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 October 29, 2026.

/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 29, 2026, 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 7/1/2026 to 9/30/2026

		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 7/1/2026):	$ -	$ -	**$1,324,182.98**
	Increases in Fund Balance:			
Line 2	Business Income	$ -	$ -	$ -
Line 3	Cash and Securities			$ -
Line 4	Interest/Dividend Income [1]	$ 7,121.51	$ 7,121.51	$ 7,121.51
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):			**$ 1,331,304.49**
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors	$ -	$ -	$ -
Line 10	Disbursements for Business Operations	$ -	$ -	$ -
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 [1]		$ -	$ -
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			**$ -**
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)			**$ -**
Line 13	**Ending Balance (As of September 30, 2026)**			**$ 1,331,304.49**
Line 14	**Ending Balance of Fund – Net Assets:**			
Line 14a	Cash & Cash Equivalents			**$ 1,331,304.49**
Line 14b	Investments			**$ -**
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund – Net Assets			**$ 1,331,304.49**

[1] Funds were received into and disburded from the Receivership accounts for Today's Growth Consultant, Inc at City National Bank. See Receipts and 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
City National Bank Interest

Date	Explanation	Amount
7/31/2026	interest	$ 0.52
7/31/2026	interest	$ 2,394.79
8/31/2026	interest	$ 0.52
8/31/2026	interest	$ 2,399.16
9/30/2026	interest	$ 0.51
9/30/2026	interest	$ 2,326.01
Total		$ 7,121.51

GRAND TOTAL OF RECEIPTS **$ 7,121.51**