EXHIBIT I

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

OBJECTION TO RECEIVER'S MOTION TO APPROVE (A) NOTICING AND CLAIMS ADMINISTRATION PROCESS AND (B) PARTIAL PLAN OF DISTRIBUTION[1]

[redacted] an Income Store Investor in the above-captioned enforcement action ("Petitioner"), objects to Receiver's Motion to Approve (A) Noticing and Claims Administration Process and (B) Partial Plan of Distribution (the "Motion") on the grounds that

a) Receiver has not identified all classes of investors,
b) Receiver discriminates in favor of "net-winners" (Receiver's term) over the rest of investor classes,
c) Receiver discriminates against only one class of investors in terms of forcing return of recent payments rather than require proof of complicity in any alleged fraud, and
d) Receiver does not deliver fair notice of liability to non-claimants by Receiver's definition of claimant.

In support of this Objection, Petitioner states as follows.

[1] Petitioner apologizes for any errors in Court-required format; Petitioner based formatting on Receiver's filings.

FACTUAL AND PROCEDURAL BACKGROUND

Petitioner, through a self-directed IRA, is a TGC investor (Exhibit A). Petitioner does not know which of the latter two classes defined below apply, therefore objects regardless of classification. All investors of similar knowledge as to TGC's internal bookkeeping should be treated equally. Petitioner notes the following facts.

1. Petitioner received from Receiver only the email notices shown in Exhibit B, which do not include the filing of the Motion on February 28, 2020.
2. Receiver filed the Motion on February 28, 2020 (court docket) but did not send an email to Petitioner on that date (Exhibit B).
3. Petitioner left town for surgery March 1, 2020.
4. Receiver sent clarification email as to the Motion on March 12 (Exhibit B).
5. Petitioner first read the Motion on March 14, 2020, after recovering from surgery.
6. Petitioner is responding as quickly as possible under the circumstances, including notifying Receiver and the Court in every possible way available, given that Petitioner is not able to use ECF (please see Certification at end of this Objection).

RECEIVER HAS NOT IDENTIFIED ALL CLASSES OF INVESTORS

The Receiver distinguishes "net-winners" – referred to in both the Initial Report and the Motion – as investors who have already received more than their initial investment AND want their websites turned over to them. (Receiver's Initial Report p. 8 fn 5 & p 23, fn 8; the Motion p. 4 fn 4 & p. 7 para. 3.) This class of investors presumably have valuable websites, rather than worthless websites.

In fact, there are *at least* FOUR (4) classes of Investors.

1) Investors who have valuable websites (future income streams), who have already received more than their initial investment ("net winners" in Receiver's words), who will forfeit only past profits in order to keep their websites. **This class of investor gets to keep prior payments up to the extent of their initial investment AND all future income streams, regardless of the timing of payments.**
2) Investors who have valuable websites (future income streams), who have not yet recovered their initial investment (not "net winners" in Receiver's words), who will not forfeit any past payments but will eventually recoup their initial investments and profit from them. **This class of investor gets to keep the entirety of their prior payments AND all future income streams.**
3) Investors who have now-worthless websites who may have been paid back their initial investment but will receive no future income stream. **This class of investor has to forfeit past payments, unlike all other classes (the Motion, Ex. A, p. 4 fn2), with no future income streams.**
4) Investors who have now-worthless websites and who have not been paid back their initial investment. **This class of investor will divide what's left after Receiver gets paid - but don't have to forfeit past payments.**

RECEIVER'S PROPOSAL DISCRIMINATES IN FAVOR OF HIGH EARNING INVESTORS OVER OTHER INVESTORS

The Motion proposes to allow investors who prefer to receive their websites (presumably because such websites are valuable) rather than monetary payment, to retain all prior payments less than or equal to the initial investment (Classes 1 & 2 as defined above) as well as keep all future revenue streams. This proposal rewards high-return investors (owners of revenue-generating websites) over low-return investors (owners of worthless websites) even though both sets of investors relied on TGC to make their websites valuable. Under Receiver's proposal, Class 1 and 2 investors are given valuable assets (in addition to past payments), while Class 3 and 4 investors are not given valuable assets. If revenue-generating websites are valued at two times annual revenues (the measure used by TGC in purchasing websites), the Receiver could quickly see how much more value Class 1 and Class 2 investors are receiving, even though ALL investors contracted with TGC for similar returns. If TGC put more effort into making highly-generating websites valuable, Receiver's treatment is a continuation of such disparate treatment of Class 3 and Class 4 investors.

RECEIVER'S PROPOSAL DISCRIMINATES AGAINST ONLY ONE CLASS OF INVESTORS IN FORCING RETURN OF RECENT PAYMENTS

Footnote 2 of Exhibit A to the Motion indicates that Class 3 investors are at liability for any payments that exceed their initial investment. This footnote implies that, somehow, only Class 3 investors are implicit in fraud. By allowing all classes other than Class 3 investors to retain recent payments (limited to initial investment for Class 1), Receiver is rewarding other classes of investors over Class 3 investors. Even Class 1 investors might keep ALL prior payments (plus a valuable website), if the most recent payment merely brought them up to initial investment. Should TGC be found to have made fraudulent payments, ALL Classes should be treated equally regarding such payments. Regardless of the class of the investor, court-identified fraudulent payments should either be retained by innocent recipients or returned by complicit recipients. Under the proposed claims format, Class 1 (to the amount of initial investment), Class 2, and Class 4 investors get to keep recent payments, while Class 3 investors must return recent payments, regardless of knowledge of fraud. Bona Fide purchasers who were being paid their normal, contracted monies, with no even though both sets of investors relied on TGC to make their websites valuable. Under Receiver's proposal, Class 1 and 2 investors are given valuable assets (in addition to past payments), while Class 3 and 4 investors are not given valuable assets. If revenue-generating websites are valued at two times annual revenues (the measure used by TGC in purchasing websites), the Receiver could quickly see how much more value Class 1 and Class 2 investors are receiving, even though ALL investors contracted with TGC for similar returns. If TGC put more effort into making highly-generating websites valuable, Receiver's treatment is a continuation of such disparate treatment of Class 3 and Class 4 investors.

RECEIVER'S PROPOSAL DISCRIMINATES AGAINST ONLY ONE CLASS OF INVESTORS IN FORCING RETURN OF RECENT PAYMENTS

Footnote 2 of Exhibit A to the Motion indicates that Class 3 investors are at liability for any payments that exceed their initial investment. This footnote implies that, somehow, only Class 3 investors are implicit in fraud. By allowing all classes other than Class 3 investors to retain recent payments (limited to initial investment for Class 1), Receiver is rewarding other classes of investors over Class 3 investors. Even Class 1 investors might keep ALL prior payments (plus a valuable website), if the most recent payment merely brought them up to initial investment. Should TGC be found to have made fraudulent payments, ALL Classes should be treated equally regarding such payments. Regardless of the class of the investor, court-identified fraudulent payments should either be retained by innocent recipients or returned by complicit recipients. Under the proposed claims format, Class 1 (to the amount of initial investment), Class 2, and Class 4 investors get to keep recent payments, while Class 3 investors must return recent payments, regardless of knowledge of fraud. Bona Fide purchasers who were being paid their normal, contracted monies, with no knowledge of how TGC was handling its books, should not be at risk of a lawsuit purely because of the timing of their investment. Only investors with knowledge of how TGC was handling its payments, and said nothing, should be at risk because they had knowledge of potentially fraudulent payments.

RECEIVER DOES NOT DELIVER FAIR NOTICE OF LIABILITY TO NON-CLAIMANTS

The first notice in any court filing to non-claimants (by Receiver's terms – someone who has received at least their initial investment and does not request a turnover of their website – presumably because the website is worthless), is in footnote 2 of Exhibit A of the Motion, an alleged Notice *to Claimants*. This alleged Notice is misleading at best, and unethical at worst. A footnote to an Exhibit to a Motion should not be the first notice to a particular Class of TGC investors. In particular, it is NOT notice to a Class of investors who are not likely to read the Legal Notice because *nothing in prior filings gave them cause to think the claims process and distribution applied to them at all.*

All prior filings put the above-defined Classes 1, 2, and 4 on notice of their rights, such that they could object. A Class 4 investor could object, for example, to the disparate treatment of their payments and websites compared to those of Classes 1 and 2, who will profit regardless of alleged fraud, even if Class 1 & 2 investors benefited from fraudulent payments prior to when Class 4 investors even contracted with TGC.

However, nothing in the prior filings put Class 3 investors on notice of liability. Class 3 is not mentioned in prior filings, even in footnotes.

CONCLUSION

Receiver has not identified all classes of investors; within her (deficient) classification of investors, Receiver discriminates in favor of investors with valuable websites over investors with worthless websites; Receiver proposes to punish only one class of investor for recent payments regardless of knowledge of fraud; and Receiver has not delivered fair notice of liability to non-claimants. If, in fact, a court finds that fraud has been perpetrated by TGC on investors, that court should

a) determine the date of the first fraudulent payment to ANY investor and treat all same-or-later dated *payments* similarly, regardless of the class of investor receiving such payment, and

b) determine if any investors were aware that TGC payments were being fraudulently generated, before such investors become liable for payments made on or after the date the Court determines TGC acted fraudulently.

It may well be that investors who socialized with Defendants were aware of more than the faceless investors who trusted Defendants but did not maintain personal contact. No investor should be penalized for putting forth money in good faith and then not attending social events.

Respectfully submitted this 15th day of March, 2020.

[redacted]

EXHIBIT A
Proof of Site Ownership

From Receiver's Exhibit C to Initial Report

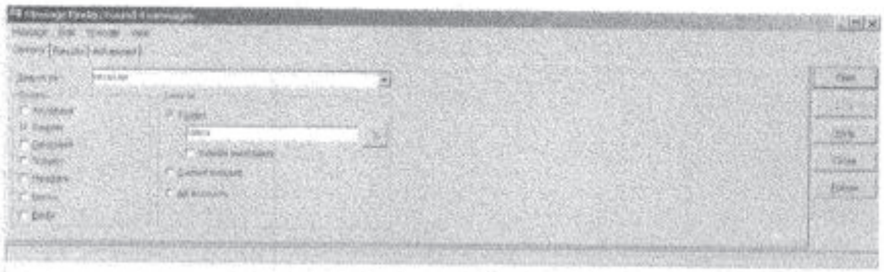
	A	D	E
184	hamiltonislandweddingsgiftregistry.com	Godaddy	Online
185	bestfundraiserwebsite.com	Godaddy	Online
186	[illegible]gifts.com	Godaddy	Online
187	onlineredpocket.com	Godaddy	Online
188	popcatwishingwell.com	Godaddy	Online
189	[illegible]giftregistry.com	Godaddy	Online
190	[illegible]giftregistry.com	Godaddy	Online
191	girlfriendweddings.com	Godaddy	Online
192	hamiltonislandweddingsgiftregistry.com.au	Godaddy	Online
193	ourwishingwell.co.uk	Godaddy	Online
194	ourwishingwell.com.au	Godaddy	Online
195	goodmorningquote.com	Godaddy	Online
196	[illegible]beats.com	Godaddy	Online
197	[illegible]	Siteground	Online
198	[illegible]daily.com	Godaddy	Online
199	approachthebench.com	Unknown	Online
200	desktopcart.com	Godaddy	Online
201	[illegible]	Godaddy	Online
202	sportsinjuryinformer.com	Godaddy	Online
203	herogamesworld.com	Godaddy	Online
204	presentsformom.com	Godaddy	Online
205	[illegible]	Shopify	Online
206	[illegible]	Siteground	Online
207	nbioutique.com	Shopify	Online
208	[illegible]parts.com	Godaddy	Online
209	travelnlife.com	Godaddy	Online
210	techexploring.com	Unknown	Online
211	defendyourhealthcare.us	Godaddy	Online
212	[illegible].net	Godaddy	Online
213	[illegible]furniture.com	Shopify	Online
214	~~[illegible]~~	Unknown	Offline
215	AugustineFurniture.com	Shopify	Online
216	[illegible]dooropenersystem.net	Godaddy	Online
217	[illegible]guides.com	Godaddy	Online
218	todaysglobalnews.net	Godaddy	Online
219	furniturefactorytk.com	Unknown	Online
220	smokingandroasting.com	Shopify	Online
221	[illegible]	Shopify	Online
222	[illegible]	Siteground	Online
223	bestbridalparty.com	Shopify	Online
224	weddingsbuzz.com	Godaddy	Online
225	[illegible]stupid.com	Godaddy	Online
226	fivehundredstones.com	Godaddy	Online
227	best-dental[illegible]schools.com	Godaddy	Online
228	cosplayshoppe.com	Shopify	Online
229	[illegible].net	Unknown	Domain Redirect

From Whois Registry

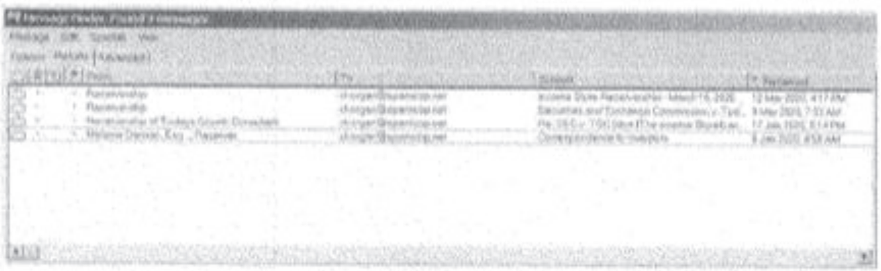
[redacted]

EXHIBIT B
Emails (sole communications) from Receiver

Search criteria:



Search results:



CERTIFICATE OF SERVICE

I HEREBY CERTIFY to all of the following:

1) that a true and correct copy of the foregoing was served on March 15, 2020 to the Receiver via email at incomestore@dvllp.com, per instructions received from the Receiver in an email dated March 12, 2010,
2) that a true and correct copy of the foregoing was served on March 15, 2020 to Receiver's Miami office via facsimile at number (305) 371-3965,
3) that a true and correct copy of the foregoing was served on March 15, 2020 to the Receiver vis USPS Priority Mail,
4) that a true and correct copy of the foregoing was served on March 15, 2020 to The United States District Court, Northern District of Illinois, Eastern Division via facsimile number at (312) 554-8529, and
5) that the original of the foregoing was served on March 15, 2020 to the United States District Court, Northern District of Illinois, Eastern Division, via USPS Priority Mail.

[redacted]