

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES SECURITIES)
AND EXCHANGE COMMISSION)

Plaintiffs,)

vs.)

) Civil Action No. 1:24-cv-03583-
) VMC

DRIVE PLANNING, LLC, and)
RUSSELL TODD BURKHALTER,)

Defendants,)

JACQUELINE BURKHALTER,)
THE BURKHALTER RANCH)
CORPORATION, DRIVE)
PROPERTIES, LLC, DRIVE)
GULFPORT PROPERTIES LLC, and)
TBR SUPPLY HOUSE, INC.,)

Relief Defendants

NOTICE OF BANKRUPTCY FILING

Interested party, Gerardo Lorenzo Linarducci (“**Debtor**”), files this Notice of Bankruptcy Filing, and informs the Court that he filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code, No. 25-03768-JMC-13, currently pending in the United States Bankruptcy Court for the Southern District of Indiana (“**Bankruptcy**”). A copy of the Notice of Bankruptcy Case Filing is attached hereto as Exhibit A. Real estate owned by Debtor and his non-bankrupt spouse located at

12162 Pearl Bay Ridge Indianapolis, IN 46236 is property of Debtor's bankruptcy estate.

/s/ Stephen D. Councill

Stephen D. Councill
Georgia Bar No. 190358

Attorneys for Defendant
Gerardo L. Lindarducci

**CERTIFICATE OF SERVICE AND
COMPLIANCE WITH LOCAL RULE 5.1**

I hereby certify that on June 29, 2025, I served all parties a true and correct copy of the **NOTICE OF BANKRUPTCY FILING**, which has been prepared in compliance with Local Rules 531C and 7.1D using 14-point Times New Roman font, by filing same with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

This 29th day of June 2025.

/s/ Stephen D. Councill

Stephen D. Councill

Georgia Bar No. 190358