

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES SECURITIES )  
AND EXCHANGE COMMISSION )  
Plaintiffs, )  
vs. )  
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

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

**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