

cc



September 30, 2019

Via UPS and Email spandya@foxswibel.com

United States District Court
Northern District of Illinois-Eastern Division
219 South Dearborn Street /United States Courthouse
Chicago, IL. 60604

FILED

OCT - 2 2019

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

2019 OCT - 2 PM 12: 12

RE: Receipt of Receivership Order / SEC vs. Northridge Holdings etal Case#19-CV-5957 12

Dear Sir/Madam:

This letter will acknowledge receipt of the Receivership Order regarding SEC vs Northridge Holdings etal. Pursuant to the order in restricting accounts and providing account information, TD Ameritrade, Inc. submits the following response.

The balance in the TDA account XXXXX0902 associated with Northridge Holdings is \$1.31 as of September 10, 2019 market value. This account has been frozen per court order pending further instructions from the court appointed receiver.

The TDA account XXXXX5174 associated with Paragon Group LP has an approximate balance of \$1.78 as of September 10, 2019. The TDA account XXXXX5228 associated with Ridgeview Group has \$0.00 balance as of September 10, 2019.

The TDA IRA accounts XXXXX7470 and XXXXX1051 of Glenn Mueller has an approximate account balance of \$0.00 as of July 11, 2019. A search of our database system found no accounts listed under the name and/or Tax ID# of Amberwood Holdings, Azlan Group, LLC, Brookstone Investment Group, LTD, Cornerstone LP, Eastridge Holdings, Guardian Investment Group, LTD, Southridge Holdings LTD, Unity Investment Group LTD, 106 Surrey Trust 14029, 561 Deere Park Trust 14106, 610 Lincoln Trust 13741, Timber Lake Apartments LLC, 5097 Elston Limited Partnership, 5528 Hyde Park LP, 106 Surrey LP, 610 Lincoln LP or G & C Mueller Family LP. A more diligent search could be performed if provided with any TDA account numbers located by the receiver/Defendants.

I affirm the information I have provided is true and complete. If any questions, please feel free to contact me at 314-343-3437 or via email at harry.carr@tdameritrade.com

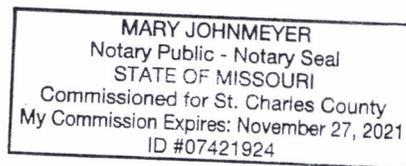
Harry A. Carr IV
Harry A. Carr IV
Paralegal-TD Ameritrade, Inc.

Sworn and subscribed before me this

the 30th day of September, 2019

Notary Public

My Commission expires: 11/27/2021



FOX SWIBEL

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312.224.1200

September 12, 2019

VIA OVERNIGHT DELIVERY

TO: The financial institutions/ parties set forth
on Annex 1 attached hereto

Re: SEC v. Northridge Holdings, Ltd., et al., Case No. 19-cv-05957 (N.D. Ill.)

Ladies and Gentlemen:

Please take notice that on September 12, 2019, the United States District Court for the Northern District of Illinois (the "Court") entered the *Order Appointing Receiver* [Dkt. No. 22] (the "Order") in the above-captioned matter (the "Litigation").¹ In accordance with the Order, each of the financial institutions/ parties (collectively, the "Notice Parties") set forth on Annex 1 attached hereto are hereby deemed to be put on notice of the Order and the Litigation.

Pursuant to the Order, the Court appointed N. Neville Reid as the receiver (the "Receiver") for the Estate of Defendant Northridge Holdings, Ltd. and the related entities and affiliates as more particularly set forth therein and duplicated for convenience on Annex 2 attached hereto (collectively, the "Receivership Defendants"). Further, in accordance with the Order, the Receiver has engaged the law firm of Fox Swibel Levin & Carroll LLP (the "Firm") as counsel for the Receiver.

¹ Capitalized terms not defined herein shall have the same meaning ascribed to them in the Order. In the event of any conflict or inconsistency between this notice (the "Notice") and the Order, the terms of the Order shall govern.

Please take further notice that the Order sets forth certain duties and obligations of each of the Notice Parties, including the following:

- Asset Freeze (see Order, ¶ 3):
 - All assets of the Receivership Defendants (collectively, the “Receivership Assets”) are frozen until further order of the Court. Such Receivership Assets include, but are not limited, to the certain accounts identified by the last four digits of their account number as set forth on Annex 3 attached hereto;
 - The asset freeze includes Receivership Assets that are on deposit with *any* financial institution or other entities.
 - All legal/ natural persons with direct or indirect control over Receivership Assets are restrained and enjoined from (directly or indirectly) transferring, setting off, changing, selling, pledging, assigning, liquidating or otherwise disposing of such assets.
- Other Duties: Financial institutions which have possession, custody or control of any Receivership Assets must take the following actions (see Order, ¶ 17):
 - *Cooperate* expeditiously with the Receiver in providing access to accounts, assets and funds, and information – as well as transferring funds, assets and accounts to the Receiver or at the direction of the Receiver;
 - *Not* liquidate, transfer, sell, convey or otherwise transfer any assets, securities, funds, or accounts in the name of or for the benefit of the Receivership Defendants except upon instructions from the Receiver;
 - *Not* exercise any form of set-off, alleged set-off, lien, or any form of self-help whatsoever, or refuse to transfer any funds or assets to the Receiver’s control without the permission of the Court; and
 - Within five (5) business days of receipt of this Notice, *file* with the Court and serve on the Receiver and counsel for the Plaintiff-SEC a certified statement setting forth, with respect to each subject account or other asset, the balance in such account or description of the assets as of the close of business on the date of receipt of this Notice.
- Permissible Actions: Note that financial institutions may continue to accept incoming wires, ACH deposits, or any other deposits of any nature into the accounts of the Receivership Defendants without violating the Order.

Please contact Ryan T. Schultz at 312.224.1231 or Suj Pandya at 312.224.1241 if you have any questions regarding this Notice, the Order, or otherwise.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ryan Schultz", with a long horizontal flourish extending to the right.

Ryan T. Schultz, Esq.

Annex 1

List of Notice Parties

Parkway Bank & Trust Co.
c/o Judith Lerner
4800 Harlem Avenue
Harwood Heights, IL 60706
Tel: 708-867-0988
Fax: 708-867-2566

TD Ameritrade, Inc.
c/o Jillian Tuck
Regulatory Compliance Analyst
200 S. 108th Ave.
Omaha, NE 68154
Tel: 402-574-6705

First American Bank
c/o Luke Petryszak
P.O. Box 0794
Elk Grove Village, IL 60009
Tel: 847-952-3700

Wells Fargo Bank
c/o Chere Tair
Legal Order Processing
MAC S4001-01E
P.O. Box 29770
Phoenix, AZ 85038
Tel: 480-724-2000
Fax: 866-670-1561

Charles Schwab & Co., Inc.
c/o Philip Ho
Corporate Compliance Department
211 Main Street
San Francisco, CA 94105
Tel: 415-667-0890
Fax: 866-305-9156

Legal Department
Barings Multifamily Capital LLC
5800 Tennyson Pkwy, Suite 200
Plano, TX 65024

Annex 2

List of Receivership Defendants

Defendants:

Affiliated entities of Defendant Glenn C. Mueller
Northridge Holdings, Ltd.
Amberwood Holdings L.P.
Brookstone Investment Group, Ltd.
Eastridge Holdings, Ltd.
Guardian Investment Group, Ltd.
Southridge Holdings, Ltd.
Unity Investment Group I, Ltd.

Affiliates of the Defendants, including but not limited to:

610 Lincoln Limited Partnership
610 Lincoln Trust #13741
5097 Elston Limited Partnership
5528 Hyde Park Limited Partnership
106 Surrey Limited Partnership
106 Surrey Trust #14029
561 Deere Park Circle Limited Partnership
149 Mason Limited Partnership
149 Mason Trust #12655
139 Austin Limited Partnership
Azlan Group, LLC
Cornerstone II Limited Partnership
G&C Mueller Family Limited Partnership
Mueller Painting & Decorating Limited Partnership
Paragon Group Limited Partnership
Ridgeview Group I Limited Partnership
Timber Lake Apartments, LLC
Arbor Limited Partnership
Kings Circle Limited Partnership
Hawthorne Limited Partnership
Timber Lake Shared Appreciation Limited Partnership
Timber Lake Shared Appreciation Illinois Limited Partnership
Town Square Management I Ltd.
Willow Creek Ventures Limited Partnership

Annex 3List of Bank Accounts

<u>Bank</u>	<u>Account Debtor</u>	<u>Account Number (last 4 digits)</u>
Parkway Bank	Amberwood	*175-6
Parkway Bank	Azlan Group, LLC	*239-6
Parkway Bank	Brookstone Investment Group, Ltd	*242-6
Parkway Bank	Cornerstone Limited Partnership	*243-4
Parkway Bank	Eastridge Holdings, Ltd.	*244-2
Parkway Bank	Guardian Investment Group, Ltd.	*245-0
Parkway Bank	Northridge Holdings, Ltd.	*264-7
Parkway Bank	Paragon Group Limited	*246-9
Parkway Bank	Ridgeview Group I	*247-7
Parkway Bank	Southridge Holdings, Ltd.	*263-9
Parkway Bank	Unity Investment Group, Ltd.	*249-3
Parkway Bank	106 Surrey	*251-5
Parkway Bank	561 Deere Park	*262-0
Parkway Bank	610 Lincoln	*261-2
Parkway Bank	Timber Lake Apartments, LLC	*260-4
Parkway Bank	5097 Elston Limited Partnership	*255-8
Parkway Bank	5528 Hyde Park Limited Partnership	*222-1
Parkway Bank	106 Surrey Limited Partnership	*232-9
Parkway Bank	610 Lincoln Limited Partnership	*234-5
Parkway Bank	G&C Mueller Family Limited Partnership	*235-3
Parkway Bank	149 Mason Limited Partnership	*233-7
Parkway Bank	Beacon Foundation	*962-2
Parkway Bank	Willow Creek Landscaping LP	*961-4
First American Bank	139 Austin LP	*2701
First American Bank	149 Mason/Trust #12655	*7801
First American Bank	Mueller Painting & Decorating	*7302