

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**V.**

GLENN C. MUELLER, et al.

**Defendants.**

**Civil Action No. 19-cv-5957**

**Honorable John Z. Lee**

**AGREED MOTION TO MODIFY RECEIVERSHIP ORDER  
TO ADD RECEIVERSHIP DEFENDANTS**

Plaintiff, U.S. Securities and Exchange Commission, through its undersigned attorneys,  
and Defendant Glenn C. Mueller, through his undersigned attorneys, jointly and respectfully  
move to modify the Order Appointing Receiver (Docket #22), entered by this Court on  
September 12, 2019 (hereinafter “Receivership Order”), as follows:

1. Paragraph 1 of the Receivership Order shall be modified to include the following three entities in the definition of Receivership Defendants:
- a. Parkway Bank and Trust Company, Land Trust Number 14106 (fee simple owner of property known as “561-564 Deere Park Circle, Bartlett, IL 60103”);
  - b. Harris Bank, N.A., Land Trust Number HTB1786 (fee simple owner of property known as “441-447 and 480-486 Lake Shore Drive, Palatine, Illinois 60067”); and
  - c. Midtown Two Unit H1003 Partnership, LLC (fee simple owner of property known as “3470 E. Coast Avenue, Unit #1003, Miami, Florida 33137”).

2. Through this agreed-upon modification, the term “Receivership Defendants” shall be construed to include the above-referenced three entities throughout the Receivership Order (Docket #22).

The parties agree that:

1. Defendant Glenn C. Mueller has the power of direction for each of the properties identified in paragraph 1. If this agreed motion is granted, the Receiver, N. Neville Reid (of the firm Fox Swibel Levin & Carroll LLP), shall assume such power subject to the terms and conditions of the Order Appointing Receiver as modified.

2. The parties reserve the right to request further modification of the Receivership Order upon discovery of new information.

3. The parties waive hearing on this agreed motion.

WHEREFORE, the parties jointly and respectfully moves this Court to grant the relief set forth in the Proposed Order, being filed concurrently herewith.

Dated: January 29, 2020

Respectfully Submitted,

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