

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

DRIVE PLANNING, LLC and RUSSELL  
TODD BURKHALTER,

Defendants.

Case No. 1:24-cv-03583-VMC

**DEFENDANT RUSSELL TODD BURKHALTER'S PRELIMINARY  
INJUNCTION DISCLOSURES**

COMES NOW, Defendant Russell Todd Burkhalter, by and through counsel, and submits his responses to Section III and Section IV of the Preliminary Injunction Freezing Assets and Granting Other Equitable Relief (Dkt. 11) and respectfully states as follows:

**SECTION III: Identifying Information**

**RESPONSE:** Defendant Russell Todd Burkhalter invokes his right under the Fifth Amendment of the United States Constitution and respectfully declines to respond to this inquiry.

SECTION IV: Accounting

**RESPONSE:** Defendant Russell Todd Burkhalter invokes his right under the Fifth Amendment of the United States Constitution and respectfully declines to respond to this inquiry.

Respectfully submitted this 20th day of August, 2024.

/s/ Aaron M. Danzig  
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**CERTIFICATE OF COMPLIANCE AND SERVICE**

Counsel for Defendant Todd Burkhalter certifies that this document has been prepared with one of the font and point selections approved by the Court in LR 5.1, NDGa, namely, Times New Roman, 14 point. Counsel further certifies that this document was electronically filed with the Clerk of Court using the using the CM/ECF system, which will send notification of such filing to all counsel of record.

This 20th day of August 2024.

*/s/ Aaron M. Danzig* \_\_\_\_\_

Aaron M. Danzig

GA Bar No. 205151