

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

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

**Defendants,**

**and**

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

**Relief Defendants.**

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

**RELIEF DEFENDANTS' PRELIMINARY INJUNCTION DISCLOSURES**

COME NOW, Relief Defendants, by and through counsel, and submit their responses to Section III of the *Preliminary Injunction Freezing Assets and Granting Other Equitable Relief* [Doc. No. 11] and respectfully state as follows:

(A) all names by which every person with authority to exercise control of that Defendants or Relief Defendant is known and the nationality of such persons;

**RESPONSE:** Jacqueline Burkhalter has authority to exercise control of Drive Properties, LLC, Drive Gulfport Properties, LLC, and TBR Supply House, Inc. She is the sole member of the two limited liability companies and the sole shareholder of TBR Supply House. She is the 50% member of The Burkhalter Ranch and has authority to make decisions on behalf of the Ranch and to manage the day to day business of the Ranch. Defendant Todd Burkhalter, the other 50% member, exercises control of the Ranch and all major decisions and expenditures are approved by Defendant Todd Burkhalter.

(B) all business and residence addresses, postal box numbers, telephone numbers, and facsimile numbers, e-mail addresses, safety deposit boxes, and storage facilities used by any Relief Defendant or by any person under their direct or indirect control, at any time since January 1, 2015 through the present; and

**RESPONSE:**

**Jacqueline Burkhalter**

Residential Addresses:

2015	180 Witheridge Drive, Johns Creek, GA
2017	782 Peachtree Street NE, # 607, Atlanta, GA
2019	782 Peachtree Street NE, #1033, Atlanta, GA
2019	855 Central Avenue NE, #403, St. Petersburg, FL
4/2022	330 East Second Street, Blue Ridge, GA
10/2022- 8/2024	1673 Hardscrabble Road, Mineral Bluff, GA

10/2022 – 176 4<sup>th</sup> Avenue NE, #1101, St. Petersburg, FL  
2/2023

Personal Phone Number: 770-710-9771

Email Addresses: [jackieann067@gmail.com](mailto:jackieann067@gmail.com)

**PLEASE NOTE THAT MRS. BURKHALTER, FOR HERSELF AND THE OTHER RELIEF DEFENDANTS, AND HER COUNSEL HAVE COMMUNICATED THROUGH THIS EMAIL ADDRESS. THESE COMMUNICATIONS ARE SUBJECT TO AND PROTECTED BY THE ATTORNEY CLIENT PRIVILEGE.**

Safe Deposit Box: None

Storage Facility: Blue Ridge Storage Solutions  
111 Tom Boyd Rd Blue Ridge GA  
Unit B23  
Only Mrs. Burkhalter's personal items are stored  
in this storage unit.

### **Drive Properties**

Business Addresses:

855 Central Avenue NE, #403, St. Petersburg, FL  
8000 Avalon Blvd., #279, Alpharetta, GA

Phone Number: 770-710-9771

Email Addresses: [driveproperties632@gmail.com](mailto:driveproperties632@gmail.com)

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

## **Drive Gulfport Properties**

Business Addresses:

855 Central Avenue NE, #403, St. Petersburg, FL  
176 4<sup>th</sup> Avenue NE, #1101, St. Petersburg, FL

Phone Number: 770-710-9771

Email Addresses: None

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Buckhalter's knowledge

## **The Burkhalter Ranch**

Business Addresses:

1061 & 1019 Hardscrabble Road, Mineral Bluff, GA

Phone Number: 770-710-9771

Email Addresses: [info@burkhalterco.com](mailto:info@burkhalterco.com)

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Buckhalter's knowledge

## **Staurolite Barn**

Business Addresses:

1061 Hardscrabble Road, Mineral Bluff, GA

Phone Number: 770-710-9771

Email Addresses: [info@burkhalterco.com](mailto:info@burkhalterco.com)

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Buckhalter's knowledge

**TBR Supply House**

Business Addresses:

10091 Blue Ridge Drive, Suite A, Blue Ridge, GA

Phone Number: 706-471-2611

Email Addresses: [sandra@burkhalterco.com](mailto:sandra@burkhalterco.com)

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

(C) each account with any financial institution or brokerage firm maintained in any Relief Defendant's name or held for any Defendant's or Relief Defendant's direct or indirect beneficial interest from January 1, 2015 through the present.

**RESPONSE:**

**The Burkhalter Ranch Corporation**

South State Bank	Business checking	8010001607677	
	Business checking	8010001513540	Staurolite Barn
Chase	Business checking	768713072	

**TBR Supply House**

South State Bank	Business checking	8010001513480	
	Business checking	8010001825190	TBR Outdoor Supply

**Drive Gulfport Properties**

South State	Business checking	8010001601296
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**Drive Properties**

Chase	Business checking	380291762
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**Jacqueline Burkhalter**

Chase	Personal checking	455886932
	Bill pay checking.	126867925
	Savings	2916635590
South State	Personal	8010001920122
	Money Market	8010001920818

Respectfully submitted, this 18<sup>th</sup> day of August 2024.

**ROUNTREE LEITMAN KLEIN & GEER, LLC**

/s/ Ceci Christy

Ceci Christy, Ga. Bar No. 370092

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*Attorneys for Relief Defendants*

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2024, I electronically filed the foregoing pleading using the CM/ECF System that will automatically send e-mail notification of such filing to all registered attorneys of record in this case.

This 18<sup>th</sup> day of August 2024.

**ROUNTREE LEITMAN KLEIN & GEER, LLC**

/s/ Ceci Christy  
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*Attorneys for Relief Defendants*