IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE COMMISSION, **Plaintiff,** **v.** **BRENDA SMITH, BROAD REACH CAPITAL, LP, BROAD REACH PARTNERS, LLC, and BRISTOL ADVISORS, LLC,** **Defendants.**	**C. A. No. 2:19-cv-17213 (MCA)**

RECEIVER KEVIN DOOLEY KENT'S TWENTY-THIRD QUARTERLY STATUS REPORT

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TABLE OF CONTENTS

I. INTRODUCTION 1
II. SUMMARY OF THE OPERATIONS OF THE RECEIVER 2
A. Litigation-Related Activities 3
i. Motions and Stipulations 3
ii. Lawsuits Filed on Behalf of the Receivership Estate 4
B. Private Investments and Ownership Interests 6
C. Investigation, Development, Pursuit and Settlement of Claims 6
D. Financial Account Reconstruction and Accounting Support 7
E. Unclaimed Property 8
F. Receivership Taxes 9
G. Business Entity Filings 9
III. CASH ON HAND, ADMINISTRATIVE EXPENSES, AND UNENCUMBERED FUNDS 10
IV. RECEIPTS AND DISBURSEMENTS 11
V. RECEIVERSHIP ASSETS 11
A. Receivership Bank Accounts 11
B. Settlements 11
C. Judgments 12
D. Cryptocurrency 14
E. Private Investments 14
F. Additional Bank Accounts and Funds 14
VI. LIQUIDATED AND UNLIQUIDATED CLAIMS HELD BY RECEIVERSHIP ESTATE 15
VII. CREDITORS 15
VIII. STATUS OF CREDITOR CLAIMS PROCEEDINGS 17
IX. RECEIVER'S RECOMMENDATIONS FOR CONTINUATION OR DISCONTINUATION OF THE RECEIVERSHIP 19
X. CONCLUSION 19

The Receiver, Kent Dooley Kent, has been appointed by Order of this Court dated June 29, 2020 ("Receivership Order"), to assume control of, marshal, pursue and preserve the Receivership Assets. (ECF No. 22). The Receiver hereby submits this Twenty-Third Quarterly Status Report (the "Report"), in accordance with Paragraphs 67 and 68 of the Receivership Order, and reports as follows:

I. INTRODUCTION

This action involves an investment advisory fraud in connection with which Defendants, Brenda A. Smith ("Brenda Smith" or "Smith"), Broad Reach Capital, LP, Broad Reach Partners, LLC and Bristol Advisors, LLC, are alleged to have raised in excess of $100 million from at least forty (40) investors, based upon false representations regarding trading strategies to be implemented when, in reality, the vast majority of these investments were funneled into unrelated companies, used to pay back other investors, or utilized for personal use. (ECF No. 1). It is estimated that investors are still owed approximately $60 million in principal. Brenda Smith pled guilty to committing securities fraud in connection with Broad Reach Capital on September 9, 2021, in *USA v. Smith*, No. 2:20-cr-00475-MCA (D.N.J.). Smith was sentenced to 109 months in prison on May 4, 2022.

On June 29, 2020, this Court appointed Mr. Kent as Receiver to assume control of, marshal, pursue and preserve assets of Defendant, Brenda Smith, and Receivership Parties Broad Reach Capital, LP ("Broad Reach Capital"), Broad

Reach Partners, LLC, Bristol Advisors, LLC, BA Smith & Associates LLC, Bristol Advisors LP, CV Brokerage, Inc., Clearview Distribution Services LLC, CV International Investments Limited, CV International Investments PLC, CV Investments LLC ("CV Investments"), CV Lending LLC, CV Minerals LLC, BD of Louisiana, LLC, TA1, LLC ("TA1"), FFCC Ventures LLC, Prico Market LLC, GovAdv Funding LLC, Elm Street Investments, LLC (ECF No. 96), Investment Consulting LLC ("Investment Consulting"), and Tempo Resources LLC (hereinafter "Receivership Assets" or "Receivership Estate"). Receivership Order, Whereas ¶ 3; ¶¶ 1–3, 5 (ECF No. 22).

This Report provides a full report and accounting of the Receivership Estate for the twenty-third quarter, reflecting the existence, value and location of currently known Receivership Assets, and the extent and nature of known liabilities.

II. SUMMARY OF THE OPERATIONS OF THE RECEIVER

On June 29, 2020, the Receiver was appointed to assume control of, marshal, pursue and preserve Receivership Assets. The total balance in the Receivership Accounts as of the close of the twenty-third quarter was $4,915,372.08.[1]

[1] Additionally, as of March 31, 2025, the balance of the Reserve Account opened to hold Reserved Funds pursuant to the Order Approving the Receiver's First Proposed Plan of Interim Distribution (ECF No. 371) was $32,062.54, consisting of the $32,041.38 first distribution and $21.16 in interest earned since the account was opened.

The Receiver and his Counsel continue to focus their efforts on preserving and maximizing Receivership Assets, pursuing claims informally and through litigation, and evaluating, negotiating and managing claims asserted against the Receivership Estate. The Receiver's Accountants continue to provide forensic support as needed, including serving as the Receiver's expert witness when appropriate, assisting with quantifying and evaluating claims asserted against the Estate, calculating distributions, managing the document repository, and performing tax-related services for the Receivership. The Receiver continues to collect settlement funds pursuant to various settlements with extended pay-out schedules. With one exception, the Receiver has largely completed the process of distributing funds to Investor Creditors pursuant to the Court's approval of his First Interim Distribution Plan.[2] The operations of the Receiver for the twenty-first quarter are outlined in further detail below.

A. Litigation-Related Activities

i. Motions

On March 19, 2026, the Receiver filed a Motion to Approve a Settlement Resolving the Receiver's Claims Against The Nottingham Company and Frank Pleasants Meadows III. (ECF No. 390).

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[2] The distribution to Investor No. 17 remains pending, as the Receiver is awaiting necessary documentation from this investor.

ii. Lawsuits Filed on Behalf of the Receivership Estate

Caption	**Status**
Kent v. Medical Consultants Instructional Training Center, et al., No. 2:21-cv-13104 (D.N.J.)	Settled; the Chapter 13 Bankruptcy Trustee has resumed payments in connection with the proceedings captioned *In Re: Carol Ford Johnston Olive*, No. 23-15398 (Bankr. D.N.J.).
Kent v. Hooper, et al., No 2:22-cv-01876 (D.N.J.)	Settled; paid in full.
Kent v. Bydalek, et al., No 2:22-cv-01811 (D.N.J.)	Settled; paid in full.
Kent v. Ellis, et al., No. 2:21-cv-20754 (D.N.J.)	Settled; paid in full.
Kent v. Galvin, et al., No. 2:21-cv-13105 (D.N.J.) *Kent v. Galvin, et al.*, No. 2:25-cv-13732 (D.N.J.).	Settled. However, the defendants defaulted on their payment obligations. On July 25, 2025, the Receiver filed a Breach of Contract and Confession of Judgment action against Galvin and his entities ("Galvin Defendants"), arising from their breach of the settlement agreement. (ECF No. 1). The Galvin Defendants have failed to response or otherwise defend the action. On March 12, 2026, the Receiver filed a Request for Entry of Default (ECF No. 12), which the Clerk entered on March 13, 2026. On April 3, 2026, the Receiver filed a Request for the Clerk's Entry of a Default Judgment against the Galvin Defendants. (ECF No. 13). On April 13, 2026, the Clerk entered a default judgment against the Galvin Defendants in the amount of $166,727.96 as of April 1, 2026, with interest continuing to accrue at a rate of 6% per annum. (ECF No. 14).
Kent v. Calcada, No. 2:21-cv-18396 (D.N.J.)	Settled; settlement payments ongoing.
Kent v. Emperor Global Enterprises LLP, et al., No. 2:21-cv-13099 (D.N.J.)	Settled; paid in full.
Kent v. Britton, et al., No. 2:22-cv-02845 (D.N.J.)	Closed. Default judgment of $1,739,863.50 obtained. The Receiver continues to explore options for executing and/or selling the judgment.
Kent v. Iregui, et al., No. 2:21-cv-20691 (D.N.J.)	Settled with Ulmer; paid in full. On 7/18/25, the Court granted the Receiver's Motion for Default Judgment against the entity defendants. (ECF No. 92). On 7/29/25, the Court granted the Receiver's Motion for Summary Judgment against Iregui in

	the amount of $2,302,649. (ECF No. 93). On 8/15/25, the Receiver filed a Motion for Pre- and Post-Judgment Interest (ECF No. 94). On 8/29/25, Iregui filed a response in opposition to the Motion. (ECF No. 97). The Receiver filed a Reply on 9/10/25. (ECF No. 98). On March 17, 2026, the Court granted the Motion for Pre- and Post-Judgment interest and directed the Receiver to submit his pre- and post-judgment interest calculations to Magistrate Judge Adams. (ECF No. 101). The Receiver submitted his calculations as directed on April 3, 2026. (ECF No. 102). Iregui appealed to the Third Circuit on 8/27/25. The Receiver sought to dismiss the appeal for lack of jurisdiction because the Receiver's Motion for Imposition of Pre- and Post-Judgment Interest remains pending. (App. Doc. 6). The Third Circuit dismissed the appeal for lack of appellate jurisdiction on 11/18/25. (App. Doc. 12). Iregui initiated another appeal to the Third Circuit on or about 4/15/26. (App. Doc. 1). On 4/20/26, the Clerk issued a letter to Mr. Iregui advising that the appeal has been submitted to a panel of the Third Circuit for possible dismissal due to a jurisdictional defect. (App. Doc. 3).
            Kent v. Iregui, et al., No. 25-2663 (3d Cir.) *Kent v. Iregui, et al.*, No. 26-1878 (3d Cir.)	
Kent v. Denise, et al., No. 2:22-cv-00388 (D.N.J.)	On 7/31/25, the Receiver filed a Motion for Summary Judgment against Jordan Denise (ECF No. 106) and a Motion for Default Judgment against the entity defendants. (ECF No. 108). Defendants did not respond to the motions. On March 26, 2026, the Court granted the Receiver's Motion for Default Judgment against the entity defendants (ECF No. 111) and Motion for Summary Judgment against Jordan Denise (ECF No. 112). On 4/24/26, the Receiver filed a Motion for Imposition of Pre- and Post-Judgment Interest. (ECF No. 113).
Surefire Dividend Capture, LP and Kevin Dooley Kent, Esq., as Receiver v. The Nottingham Company, et al., No. 19-CV-04088 (E.D. Pa.)	After conducting lengthy negotiations, the parties entered in a settlement agreement which is the subject of the Receiver's currently pending Motion to Approve. (ECF No. 390).
Kent v. Hightower, et al., No. 2:22-cv-01195 (D.N.J.)	On 9/26/25, the Receiver filed a Motion for Default Judgment against all defendants. (ECF No. 113). Defendants did not respond to the Motion. On 4/22/26, the Court granted the Motion for Default Judgment. (ECF No. 114).

Kent v. Valdes, et al. No. 2:23-cv-20475 (D.N.J.)	The Receiver produced the expert report of Michael R. Shanahan on 8/29/25. Additionally, due to various ongoing discovery disputes, the Receiver filed motions to compel and for sanctions against Defendants on 9/25/25. (ECF Nos. 56, 57). On 1/12/26, the Court administratively terminated those motions without prejudice pending resolution of defense counsel's motion to withdraw. (ECF No. 61). On 1/19/26, the Court granted the motion to withdraw. (ECF No. 63). The Court thereafter gave defendants an opportunity to secure replacement counsel, which they failed to do by the deadlines imposed. Following a video status conference which took place on March 27, 2026, the Court entered an order (1) striking the answer of the entity defendants, (2) entering a default against the entity defendants, (3) granting the Receiver leave to move for the entry of a default judgment against the entity defendants, (4) deeming Mr. Valdes to be proceeding *pro se* on behalf of himself, (5) directing Mr. Valdes to respond to the Receiver's outstanding discovery requests by April 17, 2026, (6) extending Mr. Valdes' deadline to obtain a rebuttal expert report until May 15, 2026, and (7) providing that all expert discovery shall be completed by June 12, 2026. (ECF No. 68). The next status conference is scheduled for June 18, 2026.

B. Private Investments and Ownership Interests

The Receiver anticipates seeking the Court's assistance in the near future in connection with a settlement in principle relating to Smith's potential interest in a gold mine.

C. Investigation, Development, Pursuit and Settlement of Claims

The Receiver has filed a total of fourteen (14) lawsuits on behalf of the Receivership Estate and continues to negotiate with others.

In total, ten (10) pre-litigation settlements and nine (9) litigation settlements have been formally reached as of March 31, 2025, valued at roughly $6.5 million. The Receivership Estate received $218,329.42 in settlement funds during the twenty-third quarter. Based on existing settlements with extended payout schedules, the Receivership Estate is entitled to receive an additional $1,160,000.00[3] in settlement funds through August 2028. Additionally, the Receiver is attempting to formalize the terms of one additional settlement and anticipates seeking the Court's assistance in connection therewith in the near future.

D. Financial Account Reconstruction and Accounting Support

The Receiver's Accountants at Alvarez and Marsal continue to support the Receiver's efforts. The Accountants' financial account reconstruction allowed them to make determinations regarding investor capital account activity, and they prepared supporting documentation distributed to investors in connection with the claims process. They also assisted the Receiver by preparing financial models in connection with the Receiver's Motion to Approve First Proposed Plan of Interim

[3] This figure includes the minimum amount the Receiver expects to recover in connection with his settlement of the Kent v. Nottingham matter. This figure also includes the settlement reached in the Kent v. Galvin matter, in which the Receiver recently obtained a default judgment after the Galvin Defendants failed to make the agreed-upon settlement payments. This figure excludes amounts still owed in connection with the Kent v. MCITC matter, because the Receiver does not have any present expectation or approximation of additional fund to be paid in connection with the Chapter 13 bankruptcy proceedings.

Distribution (ECF No. 346) and the Receiver's Reply in Support (ECF No. 357). The Accountants have also continued to assist the Receiver with his first interim distribution and issues that have arisen in connection with those distributions.

The Accountants have continued to support the Receivers' demands issued to, and negotiations with, third-party recipients of investor funds, and their work has allowed the Receiver to initiate and pursue litigation against various individuals and entities on behalf of the Receivership Estate. The Accountants are available to the Receiver to provide assistance with specific issues that may arise in connection with certain claims and/or lawsuits the Receiver is pursuing, and to provide necessary litigation and/or expert support. The Accountants have now issued seven (7) expert reports in connection with the Receiver's ancillary litigation—in the Calcada, Iregui, Denise, Emperor Global, Nottingham, Hightower, and Valdes matters. Michael Shanahan will likely testify as an expert if any of those cases proceed to trial.

E. Unclaimed Property

The Receiver is still awaiting a response regarding unclaimed property claims he submitted on behalf of BA Smith & Associates LLC with the Pennsylvania Department of Treasury and CV Brokerage, Inc. with the New Jersey Unclaimed Property Administration. The Receiver already deposited $20,200.13 he received from the Pennsylvania Department of Treasury for CV Brokerage, Inc. during the twenty-first quarter.

F. Receivership Taxes

The Receiver reached an agreement with the IRS regarding the claim it has asserted against the Receivership Estate. (ECF No. 322). The Court approved that agreement on November 22, 2024. (ECF No. 343).

Meanwhile, Alvarez and Marsal continues to provide tax-related services to the Receivership Estate. They are working on preparing the Receivership Estate's 2025 tax filings. They will also be preparing a plan for the ultimate dissolution of most, if not all, of the Receivership Parties.

G. Business Entity Filings

Effective January 1, 2025, Pennsylvania introduced new filing requirements providing that all business entities must submit annual reports to the Pennsylvania Department of State. The deadline for limited liability companies was September 30, 2025. In accordance with these requirements, the Receiver submitted annual reports for Pennsylvania-based Receivership Entities Clearview Distribution Services LLC, CV Investments LLC, Investment Consulting LLC, and TA1 LLC. Additionally, the Receiver paid corporate registration renewal fees for the Delaware-based Receivership Entities Bristol Advisors, LLC, CV Minerals LLC, CV Lending

LLC, and Prico Market LLC in 2025. After the close of the twenty-third quarter, the Receiver paid corporate registration renewal fees for Bristol Advisors, LLC for 2026.

III. CASH ON HAND, ADMINISTRATIVE EXPENSES, AND UNENCUMBERED FUNDS

As of March 31, 2026, total cash on hand was $4,915,372.08.[4] During the twenty-third quarter, the Receivership Estate received (a) $218,329.42 in settlement proceeds and (b) $14,262.16 in interest earnings on the WSFS savings account.[5]

The Receiver anticipates that his ongoing pursuit of claims and litigation will result in financial benefit for the Receivership Estate through settlements or judgments. Additionally, there is $479,994.57 in funds being held with ICBC USA pursuant to the Second Stipulation Regarding Funds Held with ICBCFS (ECF No. 380), which are the subject of a disputed creditor claim asserted by ICBCFS. These funds continue to accrue interest on a monthly basis.

Administrative expenses paid during this quarter total $83,485.70 and include (a) $424.50 in WSFS bank maintenance fees; (b) $16.00 in WSFS wire-in fees; and (c) $83,045.20 in professional fees to the Receiver's counsel arising from settlement payments received in December 2025 in connection with ancillary litigation subject

[4] This figure excludes the $32,062.54 balance in the Reserve Account.
[5] Additionally, the Reserve Account earned $7.90 in interest during the twenty-third quarter.

to the contingency fee arrangement approved by the Court through its Orders Approving the Receiver's Second and Third Motions for Permission to Initiate Litigation on Behalf of the Receivership Estate (ECF Nos. 161, 167), which attorneys' fees and expenses were deducted pursuant to Orders approving the Receiver's settlements in those cases.[6]

IV. RECEIPTS AND DISBURSEMENTS

Pursuant to Paragraph 68 of the Receivership Order, the schedule of the Receiver's receipts and disbursements, set forth in the Standardized Fund Accounting Report ("SFAR") prescribed by the SEC, is attached as Exhibit "A".

V. RECEIVERSHIP ASSETS

A. Receivership Bank Accounts

As of the close of twenty-third quarter, the balance in the WSFS Receivership Accounts was $4,915,372.08, broken down as follows: $4,726,124.66 in the Trust/Savings Account and $189,247.42 in the Checking Account. Additionally, the balance of the WSFS Reserve Account was $32,062.54.

B. Settlements

[6] The Receiver's counsel did not take fees on settlement payments received in December 2025 until after the close of the twenty-second quarter. Additionally, the Receiver's counsel has not taken attorney's fees from the payments received from the bankruptcy proceedings in connection with the Kent v. MCITC settlement.

The Receiver received settlement funds totaling $218,329.42 during the twenty-third quarter, broken down as follows: (a) a final payment of $218,241.14 in connection with his settlement in the Kent v. Ellis matter and (b) $88.28 from the bankruptcy trustee in connection with his settlement in the Kent v. MCITC matter. The Court previously approved these settlements.

Based on settlements with extended payout schedules in connection with the Kent v. Galvin, Kent v. Calcada, and Kent v. Nottingham Matters, an additional $1,160,000.00[7] in settlement funds is owed to the Receiver through August 2028. The Receiver is negotiating potential settlements with a few other individuals and entities. Many of these potential claims are either already in suit or are subject to tolling agreements.

C. Judgments

The Receiver obtained a default judgment against Edward C. Britton and Natural Impact Health and Fitness LP in the amount of $1,739,863.50, inclusive of pre-judgment interest and partial post-judgment interest. Meanwhile, post-judgment

[7] This figure includes the minimum amount the Receiver expects to recover in connection with his settlement of the Kent v. Nottingham matter. This figure also includes the settlement reached in the Kent v. Galvin matter, which is presently the subject of a breach of contract and confession of judgment action in which the Receiver has sought a Clerk's Entry of Judgment by Default. This figure excludes amounts still owed in connection with the Kent v. MCITC matter, because the Receiver does not have any present expectation or approximation of additional funds to be paid in connection with the Chapter 13 bankruptcy proceedings.

interest continues to accrue pursuant to 28 U.S.C. § 1961. The Receiver is continuing to explore options for the collection and/or sale of this judgment.

On July 18, 2025, the Receiver obtained a default judgment against the Entity Defendants in the Kent v. Iregui matter in the following amounts: (1) Iregui LLC - $1,109,745; (2) Orbit Global Media S.L. - $400,000; and (3) Swiss Allied Trust & Estate Services, Inc. - $200,000. (ECF No. 92). On July 29, 2025, the Receiver obtained summary judgment against Iregui personally, for a total judgment amount of $2,302,649. (ECF No. 93). Of that amount, Iregui is jointly and severally liable with Iregui LLC for $1,109,700 and with Orbit Global Media S.L. for $400,000, and is solely liable for the remainder. (*Id.*). Iregui initiated an appeal of the judgment against him, which the Third Circuit dismissed for lack of jurisdiction. The Court has granted the Receiver's request for pre- and post-judgment interest (ECF No. 101), and the Receiver has submitted calculations for post-judgment interest to allow the Court to enter the final judgment amounts.

On March 26, 2026, the Receiver obtained a default judgment against Entercore, Inc. and summary judgment against Jordan Denise, jointly and severally, in the amount of $1,040,000.00. (ECF Nos. 111, 112). The Receiver filed a Motion for Imposition of Pre- and Post-Judgment Interest on April 24, 2026. (ECF No. 113).

On April 22, 2026, the Receiver obtained a default judgment against Ronald Hightower, Janet Hightower, Blackburn International Limited, and Vestimenta Investments, LLC in the amount of $4,941,466.24. (ECF No. 114).

D. Cryptocurrency

The Receiver has learned that at least some cryptocurrency was distributed to an investor, purportedly as a partial in-kind redemption. The Receiver will report on any further developments involving the cryptocurrency in future reports.

E. Private Investments

The Receiver anticipates seeking the Court's assistance concerning his efforts to finalize a settlement relating to Smith's interest in the Calais Gold Mine in the near future. Smith continues to hold one (1) share in CMCC Development Corp.

F. Additional Bank Accounts and Funds

ICBCFS is holding $479,994.57 in funds at ICBC USA pursuant to the Second Stipulation Regarding Funds Held with ICBCFS (ECF No. 380), which are the subject of a disputed creditor claim asserted by ICBCFS. The Receiver addressed ICBCFS' claimed security and priority interest in these funds in his First Omnibus Claims Motion (ECF Nos. 254, 256, 258) and anticipates that this will be the subject of future motion practice.

VI. LIQUIDATED AND UNLIQUIDATED CLAIMS HELD BY RECEIVERSHIP ESTATE

The Receiver has filed fourteen (14) lawsuits over the course of the Receivership. One of those lawsuits has been closed following the entry of a default judgment – *Kent v. Britton, et al.*, 2:22-cv-02845 (D.N.J.). Seven of those lawsuits settled– *Kent v. MCITC, et al.*, 2:21-cv-13104 (D.N.J.), *Kent v. Hooper, et al.*, No. 2:22-cv-01876 (D.N.J.), *Kent v. Bydalek, et al.*, 2:22-cv-01811 (D.N.J.), and *Kent v. Ellis, et al.*, 2:21-cv-20754 (D.N.J.), *Kent v. Galvin, et al.*, 2:21-cv-13105 (D.N.J.), and *Kent v. Calcada*, 2:21-cv-18396 (D.N.J.), and *Kent v. Emperor Global Enterprises, LLP, et al.*, 2:21-cv-13099 (D.N.J.).

However, two of the defendants in the MCITC case with whom the Receiver settled his claims filed for bankruptcy after making their first settlement payment, and the Receiver has only recovered a total of $2,907.30 (on a $100,000.00+ claim for breach of the settlement agreement) so far in connection with the individual defendant's bankruptcy proceedings.

Additionally, Galvin and his entities defaulted on their payment obligations pursuant to his settlement with the Receiver. The Receiver accelerated the balance of their payment obligations and initiated a lawsuit against them for Confession of Judgment and Breach of Contract. The Receiver obtained a default judgment against them on April 13, 2026.

VII. CREDITORS

The total amount of confirmed Investor Creditor claims is $54,988,769.53. The total amount of disputed Investor Creditor claims remains at $14,300,000.00, with another $300,000.00 claim only conditionally approved. The Receiver has nearly finished making his first interim distribution payments pursuant to the Order Approving the Receiver's First Interim Distribution Plan, aside from payment owed to one investor for whom additional documentation is needed. (ECF Nos. 346, 371).

The total amount of confirmed Non-Investor Creditor claims remains at $1,289,533.68.[8] The total amount of disputed Non-Investor Creditor claims is currently $6,075,511.96.[9] The disputed Non-Investor Creditor claims that remain are the following:

- Liquidated and unliquidated indemnification claims asserted by ICBCFS totaling $4,084,752.28 as of March 12, 2024, which is increased from the $1,429,174.00 submitted in ICBCFS' original claim submission. The Receiver's First Omnibus Motion as to this claim was denied without prejudice as premature, and the parties may raise arguments regarding the validity, amount, reasonableness, creditor

[8] The confirmed Non-Investor Creditors are Southern Minerals Group, LLC ($160,000.00), Thomas J. McCabe ($37,620.50), Alan S. MacKenzie, Jr. ($100,000.00), Joshua B. Parker ($100,000.00), Instinet, LLC ($375,929.18), and the Internal Revenue Service ($515,984.00).

[9] As previously reported, the claims of the Estate of William McCormack ($1,336,307.95), Scott Koppenheffer ($141,052.56), CMCC Development Group, LLC ($7,900,000.00), and Richard Galvin/Galvin Investment Company ($50 + million) have been withdrawn.

status, and priority of the ICBCFS claims in the future. (ECF No. 305).[10]

- $1,990,759.68 in claims asserted by two related entities which are also associated with the remaining disputed investor claim. These claims may be the subject of a second, future motion if they cannot be resolved.

Pursuant to the Court's Order on the Receiver's Motion to Approve First Proposed Plan of Interim Distribution (ECF No. 346), these Non-Investor Creditors are not participating in the Receiver's first interim distribution. (ECF No. 371).

VIII. STATUS OF CREDITOR CLAIMS PROCEEDINGS

On July 1, 2025, the Court approved the Receiver's First Proposed Plan of Interim Distribution. (ECF No. 371). After confirming that no appeals were filed, the Receiver reached out to all investors receiving a distribution to confirm the method and location of payment and recipient information.

Distribution payments made pursuant to the Receiver's Motion to Approve First Proposed Plan of Interim Distribution (ECF No. 346) and the Order Approving the Receiver's First Interim Distribution Plan (ECF No. 371) during the twenty-first

[10] In ICBCFS' response in opposition to the Receiver's First Proposed Plan of Interim Distribution, it reported that its claim had increased by nearly 2.5 million in under ten (10) months to $6,466,490.97, without providing any support for this purported increase. (ECF No. 351).

and twenty-second quarter total $3,956,676.56.[11] The Receiver did not issue any additional distribution checks during the twenty-third quarter. The only distribution remaining in connection with the Receiver's first interim distribution is $11,282.06 owed to Investor No. 17. In consultation with his accountants, the Receiver continues to work with Investor No. 17, who was invested through IRA account. The Receiver is awaiting documentation from the investor's counsel regarding the status of that account so he can ensure payment is issued to the appropriate recipient and that proper documentation is obtained.

The Receiver advised all distribution recipients to discuss the proper handling and tax treatment of their distribution checks with their financial advisor(s) and/or tax professional(s) immediately upon receipt.

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[11] This figure includes (a) $3,154,520.41 in investor distributions which cleared during the twenty-first quarter, consisting of distributions to Investor Nos. 7, 7a, 7b, 26, 29, and 38; (b) $543,379.16 in investor distributions which cleared during the twenty-second quarter, consisting of distributions to Investor Nos. 4, 6, 8, 9, 10, 14, 15, 16, 18, 21, 23, 24, 25, 34, 35, 37, and 39; and (c) a previous distribution of $258,776.99 that Investor No. 38 received in conjunction with the Receiver's settlement resolving ownership of the Taylor Trading, LLC account, as noted in Exhibit E to the Receiver's Motion to Approve First Proposed Plan of Interim Distribution (ECF No. 346-6). Pursuant to the Court's Order, the Receiver transferred the $32,041.38 distribution to conditionally approved Investor No. 19 into the segregated Reserve Account and will continue to hold those Reserved Funds in the Reserve Account, subject to further order from the Court.

IX. RECEIVER'S RECOMMENDATIONS FOR CONTINUATION OR DISCONTINUATION OF THE RECEIVERSHIP

Given the Receiver's continued pursuit of litigation, the extended payout schedules associated with certain settlement agreements, the Receiver's ongoing negotiations, and that the Receiver anticipates making additional distributions in the future, the Receiver does not have a specific projected date by which he expects the Receivership to close. However, the Receiver is in the process of analyzing actions to consider taking in order to facilitate a winddown once several outstanding lawsuits and any future proposed distributions are resolved.

X. CONCLUSION

The Receiver, Kevin Dooley Kent, hereby respectfully submits this Twenty-Second Third Status Report for the Court's review.

Respectfully Submitted,

Date: 04/30/2026

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EXHIBIT "A"

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STANDARDIZED FUND ACCOUNTING REPORT

CIVIL – RECEIVERSHIP FUND

Brenda Smith, Broad Reach Capital, LP, Broad Reach Partners, LLC, and Bristol Advisors, LLC
Civil Action No.: 2:19-cv-17213-MCA-SDA

REPORTING PERIOD 01/01/2026 TO 03/31/2026

STANDARDIZED FUND ACCOUNTING REPORT for Consolidated Broad Reach Capital Receivership Entities - Cash Basis
Receivership; Civil Court Docket No. 2:19-CV-17213-MCA-SDA
REPORTING PERIOD 1/01/2026 TO 3/31/2026

FUND ACCOUNTING (See Instructions):		**Current Reporting Period - 1/01/26 to 3/31/26**			**06/29/2020 - 3/31/2026**	
		Detail	**Subtotal**	**Period Total**	**Case to Date**	
Line 1	**Beginning Balance (As of 1/01/26):**			**$ 4,798,320.84**	**$ -**	
	Increases in Fund Balance:					
Line 2	**Business Income**			-	-	
Line 3	**Cash and Securities**			-	8,333,775.12	
Line 4	**Interest/Dividend Income**			14,270.06	520,325.35	
Line 5	**Business Asset Liquidation**			-	700.00	
Line 6	**Personal Asset Liquidation**			-	566,581.41	
Line 7	**Third-Party Litigation Income**			218,329.42	5,011,364.61	
Line 8	**Miscellaneous - Other**			-	20,335.13	
	Total Funds Available (Lines 1 – 8):			**$ 5,030,920.32**	**$ 14,453,081.62**	
	Decreases in Fund Balance:					
Line 9	**Disbursements to Investors/Claimants**			-	3,956,676.56	[1]
Line 10	**Disbursements for Receivership Operations**			83,485.70	5,530,150.66	
Line 10a	*Disbursements to Receiver or Other Professionals*			83,045.20		
Line 10b	*Business Asset Expenses*			-		
Line 10c	*Personal Asset Expenses*			-		
Line 10d	*Investment Expenses*			440.50		
Line 10e	*Third-Party Litigation Expenses*					
	1. Attorney Fees			-		
	2. Litigation Expenses			-		
	Total Third-Party Litigation Expenses			-		
Line 10f	*Tax Administrator Fees and Bonds*			-		
Line 10g	*Federal and State Tax Payments*			-		
	Total Disbursements for Receivership Operations			**$ 83,485.70**	**$ 9,486,827.22**	
Line 11	**Disbursements for Distribution Expenses Paid by the Fund:**			**-**	**18,819.78**	
Line 11a	*Distribution Plan Development Expenses:*					
	1. Fees:					
	Fund Administrator			-		
	Independent Distribution Consultant (IDC)			-		
	Distribution Agent			-		
	Consultants			-		
	Legal Advisers			-		
	Tax Advisers			-		
	2. Administrative Expenses			-		
	3. Miscellaneous			-		
	Total Plan Development Expenses			-		
Line 11b	*Distribution Plan Implementation Expenses:*					
	1. Fees:					
	Fund Administrator			-		
	IDC			-		
	Distribution Agent			-		
	Consultants			-		
	Legal Advisers			-		
	Tax Advisers			-		
	2. Administrative Expenses			-		
	3. Investor Identification:					
	Notice/Publishing Approved Plan			-		
	Claimant Identification			-		
	Claims Processing			-		
	Web Site Maintenance/Call Center			-		
	4. Fund Administrator Bond			-		
	5. Miscellaneous			-		
	6. Federal Account for Investor Restitution (FAIR) Reporting Expenses			-		
	Total Plan Implementation Expenses			-		
	Total Disbursements for Distribution Expenses Paid by the Fund			**$ -**	**$ 18,819.78**	
Line 12	**Disbursements to Court/Other:**			**-**	**-**	
Line 12a	*Investment Expenses/Court Registry Investment System (CRIS) Fees*			-		
Line 12b	*Federal Tax Payments*			-		
	Total Disbursements to Court/Other			**$ -**	**$ -**	
	Total Funds Disbursed (Lines 9 – 11):			**$ 83,485.70**	**$ 9,505,647.00**	
Line 13	**Ending Balance (As of 3/31/26):**			**$ 4,947,434.62**	**$ 4,947,434.62**	
Line 14	**Ending Balance of Fund – Net Assets:**					
Line 14a	*Cash & Cash Equivalents*			4,947,434.62	4,947,434.62	[2]
Line 14b	*Investments*			-	-	
Line 14c	*Other Assets or Uncleared Funds*			-	-	
	Total Ending Balance of Fund – Net Assets			**$ 4,947,434.62**	**$ 4,947,434.62**	

STANDARDIZED FUND ACCOUNTING REPORT for Consolidated Broad Reach Capital Receivership Entities - Cash Basis
Receivership; Civil Court Docket No. 2:19-CV-17213-MCA-SDA
REPORTING PERIOD 1/01/2026 TO 3/31/2026

OTHER SUPPLEMENTAL INFORMATION:		Current Reporting Period - 1/01/26 to 3/31/26			06/29/2020 - 3/31/2026
		Detail	Subtotal	Period Total	Case to Date
	Report of Items NOT To Be Paid by the Fund:				
Line 15	**Disbursements for Plan Administration Expenses Not Paid by the Fund:**			$ -	$ -
Line 15a	*Plan Development Expenses Not Paid by the Fund:*				
	1. Fees:				
	Fund Administrator			-	
	IDC			-	
	Distribution Agent			-	
	Consultants			-	
	Legal Advisers			-	
	Tax Advisers			-	
	2. Administrative Expenses			-	
	3. Miscellaneous			-	
	Total Plan Development Expenses Not Paid by the Fund			$ -	
Line 15b	*Plan Implementation Expenses Not Paid by the Fund:*				
	1. Fees:				
	Fund Administrator			-	
	IDC			-	
	Distribution Agent			-	
	Consultants			-	
	Legal Advisers			-	
	Tax Advisers			-	
	2. Administrative Expenses			-	
	3. Investor Identification:				
	Notice/Publishing Approved Plan			-	
	Claimant Identification			-	
	Claims Processing			-	
	Web Site Maintenance/Call Center			-	
	4. Fund Administrator Bond			-	
	5. Miscellaneous			-	
	6. FAIR Reporting Expenses			-	
	Total Plan Implementation Expenses Not Paid by the Fund			$ -	
Line 15c	*Tax Administrator Fees & Bonds Not Paid by the Fund*			-	
	Total Disbursements for Plan Administration Expenses Not Paid by the Fund				
Line 16	**Disbursements to Court/Other Not Paid by the Fund:**			-	-
Line 16a	*Investment Expenses/CRIS Fees*			-	
Line 16b	*Federal Tax Payments*			-	
	Total Disbursements to Court/Other Not Paid by the Fund:			-	
Line 17	**DC & State Tax Payments**			$ -	$ -
Line 18	**No. of Claims:**				
Line 18a	*# of Claims Received This Reporting Period*				-
Line 18b	*# of Claims Received Since Inception of Fund*				52
Line 19	**No. of Claimants/Investors:**				
Line 19a	*# of Claimants/Investors Paid This Reporting Period*				[1]
Line 19b	*# of Claimants/Investors Paid Since Inception of Fund*				23 [1]

Notes

[1] The Order Approving the Receiver's First Proposed Plan of Interim Distribution in the amount of $4 million was granted on July 1, 2025 (ECF No. 371). The Receiver is in the process of making the approved distributions.

[2] Includes amounts held in reserve in accordance with the First Proposed Plan of the Interim Distribution Notice of Motion filed December 2, 2024 (ECF No. 346). See Order Approving the Receiver's First Proposed Plan of Interim Distribution which directs the funds to be held back in a separate, segregated account subject to further order from the Court (ECF No. 371 at p. 8). See Table 1 of the Notes to the Standardized Fund Accounting Report for detail.

Receiver:

By: Kevin Dooley Kent
(signature)

Kevin Dooley Kent
(printed name)

Receiver
(title)

Date: 4/17/26

NOTES TO THE STANDARDIZED FUND ACCOUNTING REPORT

Receivership Cash Accounts

As of March 31, 2026, the Receiver's cash balance of $4,947,434.62 was maintained in checking, savings, and business money market accounts at WSFS Bank with the following balances:

Table 1: Receivership Cash Account Balances - March 31, 2026

Financial Institution	Account Type		Balance
Receivership Cash Accounts:			
WSFS Bank	Checking	$	189,247.42
WSFS Bank	Savings		4,726,124.66
Subtotal - Receivership Cash Balance			**4,915,372.08**
Funds Held in Reserve:			
WSFS Bank	Business Money Market	$	32,062.54
Total Receivership Cash Balance and Funds Held in Reserve		**$**	**4,947,434.62**

In accordance with the First Proposed Plan of the Interim Distribution Notice of Motion filed December 2, 2024 (*See* Dkt. 346), the WSFS Business Money Market account was opened to hold funds in reserve for distributions.

This Standardized Fund Accounting Report should be reviewed in conjunction with the Receiver's Twenty Third Quarterly Status Report.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE COMMISSION, **Plaintiff,** **v.** **BRENDA SMITH, BROAD REACH CAPITAL, LP, BROAD REACH PARTNERS, LLC, and BRISTOL ADVISORS, LLC,** **Defendants.**	**C. A. No. 2:19-cv-17213 (MCA)** **CERTIFICATE OF SERVICE**

I hereby certify, this 30th day of April, 2026, that I caused to be served a true and correct copy of the Receiver Kevin Dooley Kent's Twenty-Third Quarterly Status Report, upon Plaintiff, Securities and Exchange Commission, through counsel of record, and upon counsel of record for all other parties, by electronic filing pursuant to Fed.R.Civ.P. 5(b), and upon Defendant, Brenda A. Smith, on behalf of all defendants, via first-class mail, postage prepaid, at her last known mailing address.

s/ Robin S. Weiss
Robin S. Weiss, Esq.
Attorney for Receiver, Kevin Dooley Kent, Esq.