Exhibit A

THOMPSON COBURN LLP

Jayna Marie Rust
P 202.585.6929
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jrust@thompsoncoburn.com

April 28, 2015

VIA ELECTRONIC MAIL ONLY
Blink Marketing
Attn: William Lawlor
c/o Lawrence W. Andrea, Esq.
18 South Main Street, 3FL
Norwalk, CT 06854
Email: counsel@lawrencewandrea.com

Re: Claim No. 227; *Acartha Receivership, Securities & Exchange Commission v. Burton Douglas Morriss, et al.*, No. 4:12-cv-00080

Dear Mr. Andrea:

The Receiver has reviewed the additional information that you submitted on April 16, 2015. This information was submitted pursuant to the objection process outlined in the Claims Bar Date Order and the February 3, 2015 Notice of Determination, which addressed the Receiver's recommendation to allow your claim in part and disallow your claim in part. Based on the additional information you submitted, the Receiver will now recommend allowing the portion of the claim based on Invoice No. AG_1043. The Receiver includes with this letter a revised Notice of Determination, which reflects this additional allowance.

As addressed further in the revised Notice of Determination's Exhibit A, the Receiver's recommendation to disallow the portion of your claim based on the Scope of Work document stands. Exhibit A has been revised to address the additional information you submitted and reflects certain clarifications, but the Receiver's recommendation is the same in substance. Because the Receiver's recommendation has not substantively changed, the Receiver believes that February 3, 2015 remains the date that initiates all objection procedures. As such, should you choose to file an objection with the Court, the Receiver will not object on timing grounds to an objection that uses the February 3, 2015 Notice of Determination date to determine the timeliness of such an objection. The Receiver may, however, file with the court a substantive response to any objection that may be filed with the court.

Very truly yours,
Thompson Coburn LLP

J.M. Rust

By
Jayna Marie Rust

Enclosures

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 4:12-cv-00080-CEJ
BURTON DOUGLAS MORRISS, et al.,	)	
	)	
Defendants.	)	

NOTICE OF DETERMINATION

February 3, 2015; revised April 28, 2015

Blink Marketing
c/o Lawrence W. Andrea, Esq.
127 Kent Hollow Road
Kent, CT 06757

Email: counsel@lawrencewandrea.com

Dear Claimant:

PLEASE READ THIS NOTICE CAREFULLY.

The Court Appointed Receiver in the above-referenced matter, Claire M. Schenk, has made the following determination regarding your claim designated as Claim Number 227:

The Receiver will recommend that the Court allow the claim in part. Please see the attached and revised Exhibit A for the bases of the Receiver's recommendation.

PLEASE TAKE NOTICE: If you disagree with this Determination, you have the right to file an objection and have the Court decide whether the Determination is correct. To exercise this right, you must first serve, but not file with the Court, a written objection to the Receiver's determination in accordance with the instructions herein. You must serve the objection on the Receiver (a) in person, by courier, or by mail addressed to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101, or (b) by electronic mail, as an attachment in portable document format (.pdf) to acartha.receivership@thompsoncoburn.com, within **THIRTY (30) DAYS** of the date of this Notice of Determination. The objection shall include: (i) the claim number; (ii) a detailed statement of the reasons for your objection to the Receiver's determination; (iii) copies of any document or other writing upon which you rely; and (iv) your mailing, phone, and email contact information. Objections not timely served shall be deemed waived and overruled without the need for further order of the Court or action by the Receiver.

PLEASE TAKE FURTHER NOTICE: You are required to work in good faith with the Receiver to attempt to resolve your objection before submitting the objection to the Court for determination.

PLEASE TAKE FURTHER NOTICE: If you and the Receiver are unable to resolve your objection, you shall file the written objection to the Receiver's Notice of Determination with the Court in accordance with the instructions herein. You must file the objection with the Court no earlier than **NINETY (90) DAYS** of the date of the Receiver's Notice of Determination and no later than **ONE HUNDRED TWENTY (120) DAYS** of the date of the Receiver's Notice of Determination. The objection shall include: (i) the claim number; (ii) a detailed statement of the reasons for your objection to the Receiver's Notice of Determination; (iii) copies of any document or other writing upon which you rely; (iv) your mailing, phone, and email contact information; and (v) and a certification that you have conferred in good faith with the Receiver in an effort to resolve the objection without the need for a ruling from the Court. Objections not timely filed with the Court shall be deemed waived and overruled without the need for further order of the Court or action by the Receiver.

PLEASE TAKE FURTHER NOTICE: The Receiver may, within **THIRTY (30) DAYS** of the date on which you file with the Court a written objection to the Receiver's Notice of Determination, file a response to your objection. The Receiver shall serve a copy of her response on you or your counsel. Following the filing of the Receiver's response or, if the Receiver does not file a response, the expiration of the Receiver's thirty (30) day response period, the Court will consider and rule on your objection to the Notice of Determination. Notwithstanding the procedures outlined herein, you and the Receiver may stipulate to informally resolve the dispute and may extend by agreement without leave of Court the deadline for either party to file a motion to have the Court rule on the objection and determination.

PLEASE TAKE FURTHER NOTICE: No discovery or other motion practice shall occur regarding the Receiver's Notice of Determination or facts giving rise to such determination unless you first seek and obtain leave of Court, upon a showing of good cause and substantial need to pursue such motion practice or discovery. Filing of such a motion for leave shall not suspend or extend any deadlines set forth in the Claims Bar Date Order.

Receiver Claire M. Schenk

Exhibit A[*]

Claim No. 227

The Receiver will recommend that the Court allow the claim in part.

A. Allowance in Part

Claim Based on Invoice Nos. 1015, 1017, AG_1019, 1025, and AG_1044 (Presentation Materials); Claim Based on Invoice No. AG_1043 (Web Page). The Receiver will recommend that the Court allow the portion of your claim relating to Invoice Nos. 1015, 1017, AG_1019, 1025, and AG_1044 as well as the portion of your claim relating to Invoice No. AG 1043. This proposed recommendation does not determine the final amount of your claim, establish the priority of your claim for distribution purposes, or guarantee you a distribution from the Receivership Estate. The Receiver anticipates presenting the Court with a proposed order of distribution at a later date, provided that there are Receivership assets to distribute to claimants. The Receiver will take into account all relevant equitable considerations in formulating a proposed order of distribution. Such considerations may affect the category of claims to which your claim is assigned and/or the treatment afforded your claim in a proposed order of distribution. The Receiver's proposed recommendation is based on a review of your claim, supporting documents (including, but not limited to, electronic versions of the work described, invoices for supplies, and Mr. Lawlor's affidavit(s)), and the understanding that you have provided all of the documentation requested in the Court's Claims Bar Date Order entered March 4, 2013 (Docket No. 234). If additional responsive documentation is located, it should promptly be provided to the Receiver.

B. Disallowance in Part

Claim Based on Scope of Work Document (Website Redesign). The Receiver will recommend that the Court disallow the portion of your claim relating to the Scope of Work document due to a failure to provide sufficient information to show an obligation to pay the stated amount and for a failure to provide sufficient information to show that you provided the claimed work pursuant to an agreement. In particular, the Receiver is basing her recommendation on the following grounds:

1. The Receivership Entities Did Not Have an Obligation to Pay the Stated Amount. The document submitted with your claim is not a binding contract that obligates any Receivership Entity to pay the claimed $37,500.00 (a 50% deposit). The document states "A deposit of 50% of the project costs will be required to initiate the project." The document evidences that the parties knew that further action—payment of a 50% deposit—would be required before either party had any contractual obligations. The proposal was an offer that required Acartha to accept such offer through partial performance, the payment of a deposit.

[*] The Receiver originally issued you a Notice of Determination that included an Exhibit A on February 3, 2015. This Exhibit A reflects the Receiver's revised recommendation and the bases to her recommendation due to additional supporting information you provided the Receiver during the objection process.

Until the time that Acartha paid a deposit, there was no contract and Acartha was not bound to pay Blink Marketing.

2. It Would Be Inequitable to Allow the Claim. The Court makes claim determinations based on equitable considerations. Here, it would be inequitable to allow the claim for 50% of the fees for the website redesign because (a) the pertinent documentation indicates that Blink Marketing would *not* commence work until its receipt of a deposit and (b) Blink Marketing has not even provided evidence that it completed 50% of the work required. Rather, the information that Blink Marketing has provided shows that the work it claims it completed under the contract had been completed prior to Acartha signing the Scope of Work, and the timing suggests that such "work" was completed as part of Blink Marketing's proposal. Blink Marketing has not provided any work that it completed pursuant to an agreement, and therefore, Blink Marketing's claim for website redesign should be disallowed based upon equitable considerations.

Reservation of Rights. The Receiver reserves the right to identify additional grounds for her recommendation of disallowance.

Exhibit B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.) Case No. 4:12-cv-00080-CEJ
BURTON DOUGLAS MORRISS, et al.,)
Defendants.)

NOTICE OF CLAIMS BAR DATE AND
PROCEDURES FOR SUBMITTING PROOFS OF CLAIM

TO: ALL CLAIMANTS OF THE ACARTHA RECEIVERSHIP ENTITIES

PLEASE TAKE NOTICE OF THE FOLLOWING:

On March 4, 2013, the United States District Court for the Eastern District of Missouri - Eastern Division (the "District Court") entered an order in the above-captioned case (the "Claims Bar Date Order") establishing **MONDAY, MAY 6, 2013 at 11:59 p.m. (prevailing Central Time)** as the deadline (the "Bar Date") for certain claimants to submit a completed and signed Proof of Claim Form under penalty of perjury, together with supporting documentation (a "Proof of Claim Form"), against the following entities: Acartha Group, LLC; Acartha Technology Partners, L.P.; MIC VII, LLC; and Gryphon Investments III, LLC (collectively, the "Receivership Entities").

1. WHAT IS THE BAR DATE?

The Bar Date is the date by which the individuals and entities described below must submit a Proof of Claim Form with the Receiver in the manner indicated below. The Bar Date is **MONDAY, MAY 6, 2013 at 11:59 p.m. (prevailing Central Time).** To be considered timely, Proof of Claim Forms must be (i) officially postmarked on or before the Bar Date, if sent by mail, (ii) actually received by the Receiver on or before the Bar Date, if hand-delivered or sent by courier, or (iii) transmitted on or before the Bar Date, if sent by electronic mail.[1] Claimants who submit Proof of Claim Forms by courier service, overnight service, hand delivery or electronic mail should retain a copy of their bill of lading or other proof of delivery of their Proof of Claim Form. Please note that any Proof of Claim Forms postmarked after the Bar Date, if sent by mail, received after the Bar Date, if sent by hand-delivery or courier, or transmitted after the Bar Date, if sent by electronic mail, will be subject to disallowance, which means that you would not receive any distribution from the Receiver or the Receivership Entities.

2. WHO NEEDS TO SUBMIT A PROOF OF CLAIM FORM?

All persons or entities (including, without limitation, individuals, partnerships, corporations, joint ventures, estates, trusts, and governmental units) that believe they possess a potential or claimed right to payment, or a potential claim of any nature, against any of the Receivership Entities and believe that they are owed any money by, or are entitled to a distribution (including distribution of a debt, equity or hybrid type interest) from, any of the Receivership Entities must submit a Proof of Claim Form, unless otherwise expressly stated herein, regardless of whether such claim has been acknowledged by the Receiver (each a "Claimant").

Holders of claims that arose after January 17, 2012, including "Administrative Claimants" that provided goods or services to the Receivership Entities or the Receiver at the request of the Receiver after the Receiver was appointed on January 17, 2012, are not required to submit a Proof of Claim Form prior to the Bar Date.

[1] Date and time of transmission will be determined by the time stamp given to the email by the Claimant's email provider.

Persons and entities should file Proof of Claim Forms only for claims against one or more of the Receivership Entities. Persons and entities should not file Proof of Claim Forms for claims against any other entities, including but not limited to Morris Administration d/b/a Acartha Group Funding, Acartha Merchant Partners, Acartha Special Situations Funding, Acartha Specialty Finance Investment, Clearbrook Acquisition, Evergrid Acquisition, Evergrid MIC VII, Integrien Acquisition Capital II, LLC, Integrien Acquisition II, LLC, Integrien Acquisitions, LLC, Librato Acquisition II, LLC, Tervela Acquisition II, LLC, Tervela Acquisition III, LLC, Tervela Acquisition, LLC, or other special purpose vehicle entities established by the Receivership Entities.

This notice is being sent to many persons and entities that have had some relationship or have done business with the Receivership Entities. The fact that you have received this notice does not necessarily mean that you are a Claimant, that you have a valid claim, or that the District Court or the Receiver believes you have a claim against the Receivership Entities.

3. DO I NEED TO SUBMIT A PROOF OF CLAIM FORM IF I HAVE PREVIOUSLY SUBMITTED EVIDENCE OF A CLAIM TO THE RECEIVER?

Yes. A Claimant that previously has submitted evidence of a Claim with the Receiver must submit a Proof of Claim Form evidencing such Claim in order to be entitled to receive a distribution from any of the Receivership Entities.

4. WILL THE RECEIVER NOTIFY ME WHEN SHE RECEIVES MY PROOF OF CLAIM FORM?

The Receiver will **not** notify a Claimant that the Receiver has received the Claimant's Proof of Claim Form. Claimants, however, may request confirmation of the Receiver's receipt of a Claim. Requests for confirmation of receipt of a particular Proof of Claim Form (each, a "Request for Confirmation of Receipt") shall be made (i) in writing and (ii) delivered to the Receiver by mail at Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101) or electronic mail at acartha.receivership@thompsoncoburn.com. The Receiver shall use her best efforts to respond to the Request for Confirmation of Receipt within ten (10) business days of the Receiver's receipt of the Request for Confirmation of Receipt.

5. WHAT ARE THE CONSEQUENCES OF NOT SUBMITTING A PROOF OF CLAIM FORM?

ANY CLAIMANT WHO IS REQUIRED TO SUBMIT A PROOF OF CLAIM FORM, BUT THAT FAILS TO DO SO IN A TIMELY MANNER, WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED TO THE FULLEST EXTENT ALLOWED BY APPLICABLE LAW FROM ASSERTING, IN ANY MANNER, SUCH CLAIM AGAINST THE RECEIVERSHIP ENTITIES AND THEIR RESPECTIVE PROPERTY OR ESTATES; WILL NOT BE PERMITTED TO OBJECT TO ANY DISTRIBUTION PLAN PROPOSED BY THE RECEIVER ON ACCOUNT OF SUCH CLAIM; WILL BE DENIED ANY DISTRIBUTIONS UNDER ANY DISTRIBUTION PLAN IMPLEMENTED BY THE RECEIVER ON ACCOUNT OF SUCH CLAIM; AND WILL NOT RECEIVE ANY FURTHER NOTICES ON ACCOUNT OF SUCH CLAIM. FURTHER, THE RECEIVERSHIP ENTITIES AND THEIR RESPECTIVE PROPERTY OR ESTATES WILL BE DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO SUCH CLAIM.

6. WHERE CAN I GET A COPY OF THE PROOF OF CLAIM FORM?

For your convenience, enclosed with this notice is a Proof of Claim Form. A copy of the Proof of Claim Form is also available at **http://www.thompsoncoburn.com/news-and-information/acartha-receivership-information.aspx**. Additional information can be found on the Receiver's website at **http://www.thompsoncoburn.com/news-and-information/acartha-receivership-information.aspx**. The Receiver will also provide this notice and the Proof of Claim Form to any potential Claimant who makes a written request for such documents to (a) the e-mail address acartha.receivership@thompsoncoburn.com; or (b) the address of the Receiver, Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101.

7. HOW DO I SUBMIT MY PROOF OF CLAIM FORM?

A completed and signed Proof of Claim Form, together with supporting documentation, must be submitted to the Receiver, so as to be (i) officially postmarked, if sent by mail, (ii) actually received by the Receiver, if hand-delivered or sent by courier, or (iii) transmitted, if sent by electronic mail, no later than **MONDAY, MAY 6, 2013 at 11:59 p.m. (prevailing Central Time).**

Proof of Claim Forms must be submitted to the Receiver (a) by mail to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101; (b) by courier service, overnight service or hand delivery to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101; or (c) by electronic mail, as an attachment in portable document format (.pdf), to acartha.receivership@thompsoncoburn.com. Proof of Claim Forms should not be filed with the District Court, and any Proof of Claim Form so filed will not be considered properly submitted.

You must identify, in the Proof of Claim Form, the Receivership Entity against which you are asserting a Claim if such information is available to you. However, you may submit a Proof of Claim Form against more than one or all of the Receivership Entities if, based upon a reasonable investigation, you believe that you hold a Claim against those Receivership Entities or are unsure which Receivership Entity you hold a Claim against. If you believe that you hold a Claim against more than one Receivership Entity, you do not need to file a separate Proof of Claim Form against each such Receivership Entity, but must indicate on the Proof of Claim Form each such Receivership Entity to which the Claim relates and the Claim amount(s) attributable to each such Receivership Entity.

8. SUPPORTING DOCUMENTS

Please attach to your Proof of Claim Form documents, including any electronic data, that support your Proof of Claim Form. Such documentation may include, but is not limited to: copies of personal checks, cashier's checks, wire transfer advices, account statements and other documents evidencing the investment or payment of funds; any written contract or agreement made in connection with any investment in or with any Receivership Entity; a chronological accounting of all money received by the Claimant from any Receivership Entity or the Receiver, whether such payments are denominated as the return of principal, interest, commissions, finder's fees, sponsor payments, or otherwise; copies of all documentation and records reflecting or regarding any withdrawals ever made by or payments received by the Claimant from any Receivership Entity or the Receiver; copies of all agreements, promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, or evidence of perfection of lien; and other documents evidencing the amount and basis of the Claim. DO NOT SEND ORIGINAL DOCUMENTS. If such supporting documentation is not available, please explain why in an addendum that is attached to your Proof of Claim Form.

Please do not submit the following types of materials with a Proof of Claim Form unless requested by the Receiver: (1) marketing brochures and other marketing materials received from Receivership Entities; (2) routine or form correspondence received from Receivership Entities; (3) copies of pleadings on file in any case involving the Receiver or the Receivership Entities; and (4) other documents received from Receivership Entities that do not reflect Claimant specific information concerning the existence or value of a Claim.

9. REQUESTS FOR ADDITIONAL INFORMATION, INTERVIEWS AND NOTICES OF DEFICIENCY

Prior to disallowing a Claim for lack of information, the Receiver will send to you, by email or mail to the email or physical address provided by you in the Proof of Claim Form (if provided) or if no such address was provided, to the original email or physical address to which the Bar Date Notice was sent, a written Notice of Deficiency that specifically identifies the information required to process the Claim. The Notice of Deficiency will further state that the Claim will be disallowed for lack of sufficient information if you do not provided the additional information within sixty (60) days of issuance of the Notice of Deficiency. The Receiver may disallow a Claim if you fail to respond to the Notice of Deficiency within sixty (60) days of issuance of the Notice of Deficiency.

A Claimant shall submit to an interview by the Receiver if the Receiver, in her discretion requests an interview to facilitate processing of the Claimant's Claim.

10. NOTICES OF DETERMINATION

The Receiver will provide a written Notice of Determination to each Claimant that submits a Proof of Claim Form. The Receiver will provide the Notice of Determination with respect to Proof of Claim Forms for which the Receiver did not issue a Notice of Deficiency on or before the date that is sixty (60) days after the Bar Date. The Receiver will provide the Notice of Determination with respect to Proof of Claim Forms for which the Receiver did issue a Notice of Deficiency on or before the later of (i) the date that is sixty (60) days after the date the Receiver issued the Notice of Deficiency to the Claimant or (ii) the date that is sixty (60) days after the date the Receiver receives the Claimant's response to the Notice of Deficiency.

If the Receiver has disallowed the Claim in whole or in part, the Notice of Determination shall so state and will include a statement setting forth the reasons for disallowing the Claim. The Notice of Determination will provide for instructions for challenging the Receiver's determination.

The processes set forth in the Claims Bar Date Order and related documents for submitting Proof of Claim Forms and obtaining the Receiver's determination on submitted Claims do not guarantee a Claimant a distribution from the Receivership Estates or establish a Claimant's priority for distribution purposes. The Receiver anticipates presenting the Court with a proposed order of distribution at a later date, provided that there are Receivership assets to distribute to Claimants.

11. COOPERATION

The Court has directed all parties and Claimants to cooperate with the Receiver to the maximum extent possible to achieve swift resolution of disputes concerning Claims.

12. CONSENT TO JURISDICTION

If you submit a Proof of Claim Form in this case, you consent to the jurisdiction of the District Court for all purposes related to your Claim and agree to be bound by its decisions, including, without limitation, a determination as to the validity and amount of any Claims asserted against the Receivership Entities. In submitting a Proof of Claim Form, you agree to be bound by the actions of the District Court even if that means your Claim is limited or denied.

13. RESERVATION OF RIGHTS

The Receiver reserves the right to dispute, or assert offsets or defenses as to the nature, amount, liability, classification, or otherwise against, any amounts asserted in any Proof of Claim Form. Nothing set forth in this notice or the Proof of Claim Form shall preclude the Receiver from objecting to any Proof of Claim Form, on any grounds.

Dated this 15th day of March, 2013.

BY ORDER OF THE HONORABLE CAROL E. JACKSON
UNITED STATES DISTRICT COURT JUDGE

THOMPSON COBURN L.L.P.
ATTORNEYS FOR RECEIVER CLAIRE M. SCHENK

Exhibit C

PROOF OF CLAIM IS TO BE FILED WITH RECEIVER -- DO NOT FILE WITH COURT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.) Case No. 4:12-cv-00080-CEJ
BURTON DOUGLAS MORRISS, et al.,)
Defendants.)

PROOF OF CLAIM FORM
Please Type or Print in the Boxes Below
Do NOT use Red Ink, Pencil, or Staples

FOR RECEIVER'S USE ONLY

Claim No.: ____________

Date of Claim: _____ / _____ / _______[1]

PART I: CLAIMANT IDENTIFICATION

Name of Individual (Last, First) or Entity

____

If Entity, Name (Last, First) of Individual Completing Form on behalf of Entity **Title**

____ ______________

Street Address

____

City **State** **Zip Code**

______________________ ________ ____________

Foreign Province **Foreign Postal Code** **Foreign Country Name/Abbreviation**

______________ ______________ ______________

Telephone Number (Primary)
_______ - _______ - _______

Telephone Number (Alternate)
_______ - _______ - _______

Email Address

____

[1] For Claims sent by regular mail, "Date of Claim" means: (i) for Claims sent by regular mail, the date shown on the official postmark on the Proof of Claim Form envelope; (ii) for Claims sent by hand delivery or courier, the date the Receiver actually received the Proof of Claim Form; and (iii) for Claims sent by electronic mail, the date that the email was transmitted as determined by the time stamp given to the email by the Claimant's email provider (adjusted to prevailing Central Time as necessary).

PART II: CLAIM

AMOUNT OF CLAIM: ________________________ (if your claim is based on equity or other interest(s) and is not subject to specific valuation, please include such information in the "Specific Grounds for Claim" box below)	**DATE CLAIM INCURRED**: _________________

Please identify, by checking the appropriate box, the Receivership Entity against whom this claim is asserted:

☐ Acartha Group, LLC
☐ Acartha Technology Partners, L.P.
☐ MIC VII, LLC
☐ Gryphon Investments III, LLC

Specific Grounds for Claim (attach additional sheet(s), if necessary). ____
____
____
____

☐ **Secured Claim**. Check this box if you contend that your claim is subject to a security interest. Attach copies of all documents that evidence the claim of secured status, including, but not limited to, promissory notes, mortgages, security agreements, and evidence of perfection of lien.

Asserted Value of Collateral:
$ __________________ . 00

Description of Collateral:
____
____

If Court Judgment, Date Obtained:
_____ / _____ / __________

If Legal Action Pending, Date Commenced, Court Name, and Case No.:
_____ / _____ / __________
____

Claim Status.
☐ Check box if you are aware that anyone else has filed a Proof of Claim Form relating to your Claim. (Attach statement giving particulars.)
☐ Check box if the address entered on this form differs from the address on the envelope sent to you by the Receiver (if you received this form via mail).

Check here if this Proof of Claim:
☐ Amends
☐ Replaces
☐ Supplements a previously filed Proof of Claim Form, dated: ________________

YOU MUST READ AND SIGN THE RELEASE AND THE CERTIFICATE OF TRUTHFULNESS OF PAGE 3. FAILURE TO SIGN THE RELEASE AND THE CERTIFICATE OF TRUTHFULNESS MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.

SUPPORTING DOCUMENTATION: Please attach to your Proof of Claim Form only documents (including copies of emails and other electronic data) that support your Proof of Claim Form. Such documentation may include, but is not limited to: copies of personal checks, cashier's checks, wire transfer advices; account statements and other documents evidencing the investment or payment of funds; any written contract or agreement made in connection with any investment in or with any Receivership Entity; a chronological accounting of all money received by the Claimant from any Receivership Entity or the Receiver, whether such payments are denominated as the return of principal, interest, commissions, finder's fees, sponsor payments, or otherwise; copies of all documentation and records reflecting or regarding any withdrawals ever made by or payments received by the Claimant from any Receivership Entity or the Receiver; copies of all agreements, promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, or evidence of perfection of lien; and other documents evidencing the amount and basis of the Claim. DO NOT SEND ORIGINAL DOCUMENTS. If such documentation is not available, please attach an explanation of why the documents are not available.

Please do not submit the following types of materials with a Proof of Claim Form unless requested by the Receiver: (1) marketing brochures and other marketing materials received from the Receivership Entities; (2) routine or form correspondence received from the Receivership Entities; (3) copies of pleadings on file in any case involving the Receiver or the Receivership Entities; and (4) other documents received from Receivership Entities that do not reflect Claimant specific information concerning the existence or value of a Claim.

VERIFICATION OF CLAIMS: All Proof of Claim Forms submitted are subject to verification by the Receiver and approval by the Court. It is important to provide complete and accurate information to facilitate this effort. Claimants must be willing to submit to an interview and may be asked to supply additional information to complete the claims process.

CONSENT TO JURISDICTION: By submitting your Proof of Claim Form, you consent to the jurisdiction of the United States District Court for the Eastern District of Missouri for all purposes and agree to be bound by its decisions, including, without limitation, a determination as to the validity and amount of any Claims asserted against the Receivership Entities. In submitting your Proof of Claim Form, you agree to be bound by the actions of the United States District Court for the Eastern District of Missouri even if that means your Claim is limited or denied.

CERTIFICATE OF TRUTHFULNESS: Pursuant to 28 U.S.C. § 1746, I, the undersigned, hereby certify, **under penalty of perjury under the laws of the United States of America**, that all of the information provided in this Proof of Claim Form, including all Schedules and attachments to the Proof of Claim, is true and correct and that the undersigned is authorized to make this Claim.

____
(Sign your name here)

____
(Date)

____
(Type or print your name here)

____
(Capacity of person(s) signing)

Submit your Proof of Claim Form and supporting documentation to the Receiver: (1) by mail to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101; (2) by courier service, overnight service or hand delivery to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101; or (3) by electronic mail, as an attachment in portable document format (.pdf), to acartha.receivership@thompsoncoburn.com.

Reminder Checklist:
1. Please sign the above declaration.
2. Remember to attach supporting documentation, if available.
3. Keep a copy of your claim form and all supporting documentation for your records.
4. If your contact information changes, please send the Receiver updated information.

Exhibit D

Rust, Jayna M.

From: Lawrence W. Andrea, Esq. <counsel@lawrencewandrea.com>
Sent: Monday, September 29, 2014 10:57 AM
To: Rust, Jayna M.
Subject: Acartha Group, LLC Claims Process -- Blink Marketing Group, LLC ("Blink"), Norwalk, CT
Attachments: Blink - Acartha receivership filing - returned mail.pdf; Blink - Acartha Receivership Proof of Claim Form - signed 4.23.2013.pdf; Letter from receiver on claim status - 2014.09.17.pdf

Ms. Rust -- Further to our conversation this morning, I attach the following:

1. Blink's claim form signed by William Lawlor, its principal, on April 23, 2013 and accompanying papers;
2. A PDF of the envelope in which the claim form and papers were sent, along with the certified mail receipt and "green card"; and
3. a copy of your letter dated September 17, 2014 in response to Blink's recent inquiry, for your reference and convenience.

It appears that Blink's claim form was sent timely and to the correct address (as it is set out on page 3 of the claim form). As I told you on the telephone that once Blink received back the USPS notice of undeliverability, a Blink representative actually tried to deliver the claim via email. I am still trying to obtain that message.

Blink requests that, in light of the above and given the documentation I submit herewith, its claim be accepted as timely filed and considered on its merits. I ask that you contact me once you have reviewed this matter to discuss it further. Thank you for the courtesy you showed me this morning when we spoke and thank you in advance for your consideration of this request.

LWA
Lawrence W. Andrea, Esq.
127 Kent Hollow Road
Kent, CT 06757
860-927-3372
860-927-3375 (fax)
counsel@lawrencewandrea.com
www.lawrencewandrea.com

Blink Marketing Group, LLC
18 South Main Street, 3FL
Norwalk, CT 06854

7010 0290 0000 5126 3895

UNITED STATES POSTAL SERVICE
1000
63101
U.S. POSTAGE PAID
NORWALK,CT
06854
APR 23, '13
AMOUNT
$7.17
00101256-10

NIXIE 631013045-1N 05/01/13

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
RETURN TO SENDER

Acartha Group Receivership
505 North 7th Street
Saint Louis, Missouri 63101

7010 0290 0000 5126 3895

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

SAINT LOUIS MO 63101

Postage	$ $1.52	0856
Certified Fee	$3.10	16
Return Receipt Fee (Endorsement Required)	$2.55	Postmark Here
Restricted Delivery Fee (Endorsement Required)	$0.00	
Total Postage & Fees	$ $7.17	04/23/2013

Sent To Acantha Group Receivership
Street, Apt. No.; or PO Box No. 505 North 7th St
City, State, ZIP+4 St Louis MO 63101

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Acantha Group Receivership
505 North 7th St
St Louis MO 63101

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature]
☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7010 0290 0000 5126 3895

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

PROOF OF CLAIM IS TO BE FILED WITH RECEIVER -- DO NOT FILE WITH COURT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, v. BURTON DOUGLAS MORRISS, et al., Defendants.	)))))	Case No. 4:12-cv-00080-CEJ

PROOF OF CLAIM FORM
Please Type or Print in the Boxes Below
Do NOT use Red Ink, Pencil, or Staples

FOR RECEIVER'S USE ONLY

Claim No.: ____________

Date of Claim: _____ / _____ / _______[1]

PART I: CLAIMANT IDENTIFICATION

Name of Individual (Last, First) or Entity
Blink Marketing Group, LLC

If Entity, Name (Last, First) of Individual Completing Form on behalf of Entity
William Lawlor

Title
Managing Member

Street Address
18 South Main Street, 3FL

City
Norwalk

State
CT

Zip Code
06854

Foreign Province

Foreign Postal Code

Foreign Country Name/Abbreviation

Telephone Number (Primary)
2 0 - 3 9 - 5 6

Telephone Number (Alternate)
2 0 - 9 5 - 7 3

Email Address
blawlor@blinkmkg.com note that format for telephone field is off = 203-956-7310

[1] For Claims sent by regular mail, "Date of Claim" means: (i) for Claims sent by regular mail, the date shown on the official postmark on the Proof of Claim Form envelope; (ii) for Claims sent by hand delivery or courier, the date the Receiver actually received the Proof of Claim Form; and (iii) for Claims sent by electronic mail, the date that the email was transmitted as determined by the time stamp given to the email by the Claimant's email provider (adjusted to prevailing Central Time as necessary).

PART II: CLAIM

AMOUNT OF CLAIM: $74,594.00
(if your claim is based on equity or other interest(s) and is not subject to specific valuation, please include such information in the "Specific Grounds for Claim" box below)

DATE CLAIM INCURRED: 8/2011 - 11/2011

Please identify, by checking the appropriate box, the Receivership Entity against whom this claim is asserted:

☒ Acartha Group, LLC
☐ Acartha Technology Partners, L.P.
☐ MIC VII, LLC
☐ Gryphon Investments III, LLC

Specific Grounds for Claim (attach additional sheet(s), if necessary).

~~services performed and goods sold~~

☐ **Secured Claim**. Check this box if you contend that your claim is subject to a security interest. Attach copies of all documents that evidence the claim of secured status, including, but not limited to, promissory notes, mortgages, security agreements, and evidence of perfection of lien.

Asserted Value of Collateral:
$ ________ . 00

Description of Collateral:

If Court Judgment, Date Obtained:
____ / ____ / ______

If Legal Action Pending, Date Commenced, Court Name, and Case No.:
____ / ____ / ______

Claim Status.

☐ Check box if you are aware that anyone else has filed a Proof of Claim Form relating to your Claim. (Attach statement giving particulars.)
☐ Check box if the address entered on this form differs from the address on the envelope sent to you by the Receiver (if you received this form via mail).

Check here if this Proof of Claim:
☐ Amends
☒ Replaces
☐ Supplements a previously filed Proof of Claim Form, dated: 02/03/2012-filed wit

YOU MUST READ AND SIGN THE RELEASE AND THE CERTIFICATE OF TRUTHFULNESS OF PAGE 3. FAILURE TO SIGN THE RELEASE AND THE CERTIFICATE OF TRUTHFULNESS MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.

SUPPORTING DOCUMENTATION: Please attach to your Proof of Claim Form only documents (including copies of emails and other electronic data) that support your Proof of Claim Form. Such documentation may include, but is not limited to: copies of personal checks, cashier's checks, wire transfer advices; account statements and other documents evidencing the investment or payment of funds; any written contract or agreement made in connection with any investment in or with any Receivership Entity; a chronological accounting of all money received by the Claimant from any Receivership Entity or the Receiver, whether such payments are denominated as the return of principal, interest, commissions, finder's fees, sponsor payments, or otherwise; copies of all documentation and records reflecting or regarding any withdrawals ever made by or payments received by the Claimant from any Receivership Entity or the Receiver; copies of all agreements, promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, or evidence of perfection of lien; and other documents evidencing the amount and basis of the Claim. DO NOT SEND ORIGINAL DOCUMENTS. If such documentation is not available, please attach an explanation of why the documents are not available.

Please do not submit the following types of materials with a Proof of Claim Form unless requested by the Receiver: (1) marketing brochures and other marketing materials received from the Receivership Entities; (2) routine or form correspondence received from the Receivership Entities; (3) copies of pleadings on file in any case involving the Receiver or the Receivership Entities; and (4) other documents received from Receivership Entities that do not reflect Claimant specific information concerning the existence or value of a Claim.

VERIFICATION OF CLAIMS: All Proof of Claim Forms submitted are subject to verification by the Receiver and approval by the Court. It is important to provide complete and accurate information to facilitate this effort. Claimants must be willing to submit to an interview and may be asked to supply additional information to complete the claims process.

CONSENT TO JURISDICTION: By submitting your Proof of Claim Form, you consent to the jurisdiction of the United States District Court for the Eastern District of Missouri for all purposes and agree to be bound by its decisions, including, without limitation, a determination as to the validity and amount of any Claims asserted against the Receivership Entities. In submitting your Proof of Claim Form, you agree to be bound by the actions of the United States District Court for the Eastern District of Missouri even if that means your Claim is limited or denied.

CERTIFICATE OF TRUTHFULNESS: Pursuant to 28 U.S.C. § 1746, I, the undersigned, hereby certify, **under penalty of perjury under the laws of the United States of America**, that all of the information provided in this Proof of Claim Form, including all Schedules and attachments to the Proof of Claim, is true and correct and that the undersigned is authorized to make this Claim.

____________________ 04/23/2013

(Sign your name here) (Date)

Willilam Lawlor

(Type or print your name here)

Managing Member

(Capacity of person(s) signing)

Submit your Proof of Claim Form and supporting documentation to the Receiver: (1) by mail to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101; (2) by courier service, overnight service or hand delivery to Acartha Group Receivership, 505 North 7th Street, Saint Louis, Missouri 63101; or (3) by electronic mail, as an attachment in portable document format (.pdf), to acartha.receivership@thompsoncoburn.com.

Reminder Checklist:

1. Please sign the above declaration.
2. Remember to attach supporting documentation, if available.
3. Keep a copy of your claim form and all supporting documentation for your records.
4. If your contact information changes, please send the Receiver updated information.

Blink Marketing LLC
Delaware Bankruptcy Court - Proof of Claim
Acartha Group
January 31, 2012

	Document	Date	Subject	
1.	Scope of Work	8/14/2011	deposit on contract for website redesign	$37,500.00
2.	Invoice 1015	6/5/2011	presentation supplies	$2,244.00
3.	Invoice 1017	5/8/2011	Acartha & ATP2 investor presentations	$17,500.00
4.	Invoice AG_1019	7/21/2011	Presentation production and delivery	$8,950.00
5.	Invoice 1025	6/21/2011	Capital Recap presentation	$7,400.00
6.	Invoice AG_1043	11/11/2011	Web site "under construction" page	$400.00
7	Invoice AG_1044	11/11/2011	Capital Recap presentation modifications	$600.00
				$74,594.00

2011 Website Redesign
Acartha Group

08.14.2011

blink

1.0
Project Scope

Acartha Group has requested a scope of work, deliverables and related costs for the strategic development, design and execution of its new corporate website.

The project scope consists of the following components:

2.1 Corporate Website
2.2 Mobile-Aware Functionality

Timeline: 8 - 12 Weeks in total.
Blink will provide Acartha Group with a detailed project timeline upon project engagement.

2.1
Corporate Website

The Acartha Group online environment must interactively share information, integrate with new and existing technology systems, and align with overall corporate messaging and business strategy. From a creative perspective, the corporate website must evoke emotion and magnify the Acartha Group brand identity.

Blink uses leading web tools and languages, including: HTML 5, HTML, XML, Java, JSP, Cold Fusion, ASP, PHP, DB2, Oracle, MySQL, SQL Server, streaming media, and Flash.

The following is Blink's typical process for web development, structured to ensure that all design and development meet client expectations (some stages may not apply to this project).

EXECUTIVE BRIEFINGS
COMPETITIVE AND INDUSTRY REVIEW
MESSAGE DEVELOPMENT

WIREFRAME / NAPKIN CREATION

GRAPHIC DESIGN
CONTENT GATHERING

CODING AND PROGRAMMING
APPLICATION INTEGRATION
CONTENT MANAGEMENT STRATEGY

SERVER CONFIGURATION
CONTENT LOADING
TESTING

Blink will engage with multiple Acartha Group executives at various levels to create and deliver a website that meets the project's requirements and objectives. Acartha Group's website will require strategy, architecture development, copy development, graphic design, and technical services surrounding site coding, and content loading, testing and privacy considerations.

The site will be based on the sitemap found in Appendix A (A.1)

Deliverables:

- → Briefings and communication strategy
- → Architecture and navigation development
- → Wireframe creation
- → Graphic design and preparation
- → 2 rounds of concept modifications
- → Coding based on site requirements
- → Content Management System integration
- → SEO Configuration
- → Site entrance programming
- → First draft copy to be provided by client
- → Copy editing and proofing
- → Content loading
- → Testing and refinement
- → Site launch
- → Project Management

- → CMS license as well as Hosting and maintenance recommendations will be provided (hosting services are available if necessary)
- → An additional SOW and costs will be provided for photography selection and usage based on recommendations, client selection and approval

2.2
Mobile-Aware Functionality

The delivery of Acartha Group's website based on device platform will present Acartha as a forward-thinking firm that utilizes the most current technologies to deliver a clean, clear and precise message.

The goal of mobile-aware development is the creation of a responsively designed website. Responsive web design means creating an adaptive design that's aware of the context it's viewed in and optimizes its display accordingly. Using a common set of content, and code - responsive design provides the following benefits. (This is a short list, but the benefits are significant.)

- → When content needs to be updated, it's updated one time, in one location, and that change is reflected on every device and screen size
- → Web page designs adapt dynamically to any screen size to present a layout that is appropriate to the device, be it a phone, a tablet, or a large monitor, a TV, etc. Consideration for those different devices is built into the design from the start
- → URL structure (and therefore links, which might be shared, or crawled by search engines) work universally across all devices and screen sizes
- → We don't need to revise or create a new website to adapt to each new device or screen resolution that comes out, one website will serve them all now, and in the future
- → It also takes into account a few things like providing, phone links for phone numbers, and it responds to orientation changes on devices

4.0
Project Component Costs

This proposal contains estimated costs based on a fixed bid in accordance with existing project scope.

Design, Development and Execution

→ Corporate Website	$ 55,000.00
→ Mobile-Aware Functionality	$ 20,000.00

**Estimated costs do not include costs associated with the research, collection or acquisition of photography, image license fees, printing, and/or paper, web hosting, licensing of third-party applications, or commerce components, such as secure certificates, payment gateways, or merchant accounts. Estimated costs do not include costs associated with trademark or copyright research and applications, postage or overnight delivery fees or international calls. Which if required, the client agrees to pay as an additional fee. All line items do not include any travel costs that may be associated with the project, which, if incurred, shall be paid for by the client.*

5.0 Approval

Budgetary Approvals:

All project costs are based on fixed cost basis determined by current needs described by the Acartha Group team. If the project extends past the project scope or the agency estimated project hours, due to specific requests made by the client during the development process, the agency will notify Acartha Group and provide the client with an adjusted scope of work including details pertaining to additional project hours and costs for which the client understands and agrees to pay additional related fees.

A deposit of 50% of the project costs will be required to initiate the project. Upon creative review and approval, Blink will deliver an invoice for a second payment of 25% for each project component. The balance of the project cost (25%) and any associated additional costs will be due upon delivery of each project component.

Pricing reflects agency fees and does not include costs associated with the collection, or acquisition, of photography, image license fees, printing, and/or paper, web hosting, licensing of third-party applications, or commerce components, such as secure certificates, payment gateways, or merchant accounts. Estimated costs do not include costs associated with trademark or copyright research and applications, postage or overnight delivery fees or international calls, which if required, the client agrees to pay as an additional fee.

All line items do not include any travel costs that may be associated with the project, which, if incurred, shall be paid for by the client.

EXECUTED AND AGREED TO BY THE PARTIES HERETO:

Blink	Acartha Group
Bill Lawlor 2000 Post Road, Suite 205 Fairfield CT 06824	Doug Morriss, Chairman & CEO Signature ______ Date: 8/29/11

A.3
Agency Overview

Blink, a sales & marketing communications agency, combines strategic planning, award winning design, brand strategies and leading technologies to deliver complete sales and marketing communication solutions for our clients. Headquartered in Fairfield CT, the agency focuses on three primary areas; executive communications, brand and marketing communications, and the integration of marketing programs within our client's sales processes geared towards increasing top-line revenue growth and driving efficiencies throughout the sales cycle.

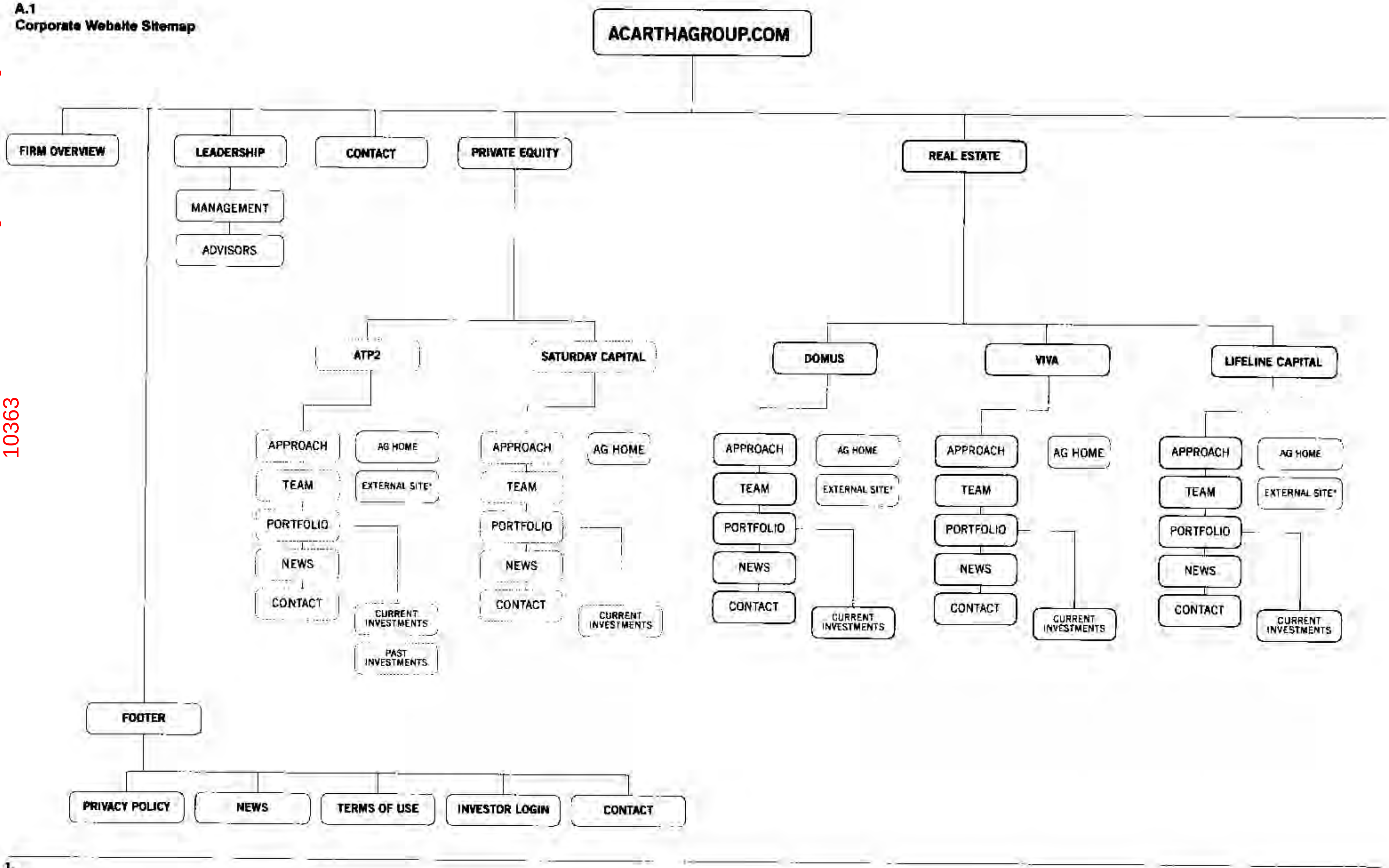
Blink performs these services for companies such as LogicSource, Acartha Group, Y&R, LG, RelaDyne, TransPerfect, Touch Commerce, Domus, Winderemere Island, VGS Creative, LifeCare, Iconoculture, DSA Encore, Kidd & Company, Wolf Means Business, Vumber, Coastal Construction Group, SCI Worldwide, Story (formally Byte Interactive), RK Marketing and Cava Capital.

Contact Information:
Blink
20 Marshall Street
Suite 105
South Norwalk, CT 06854
203.856.8353
www.blinkmkg.com

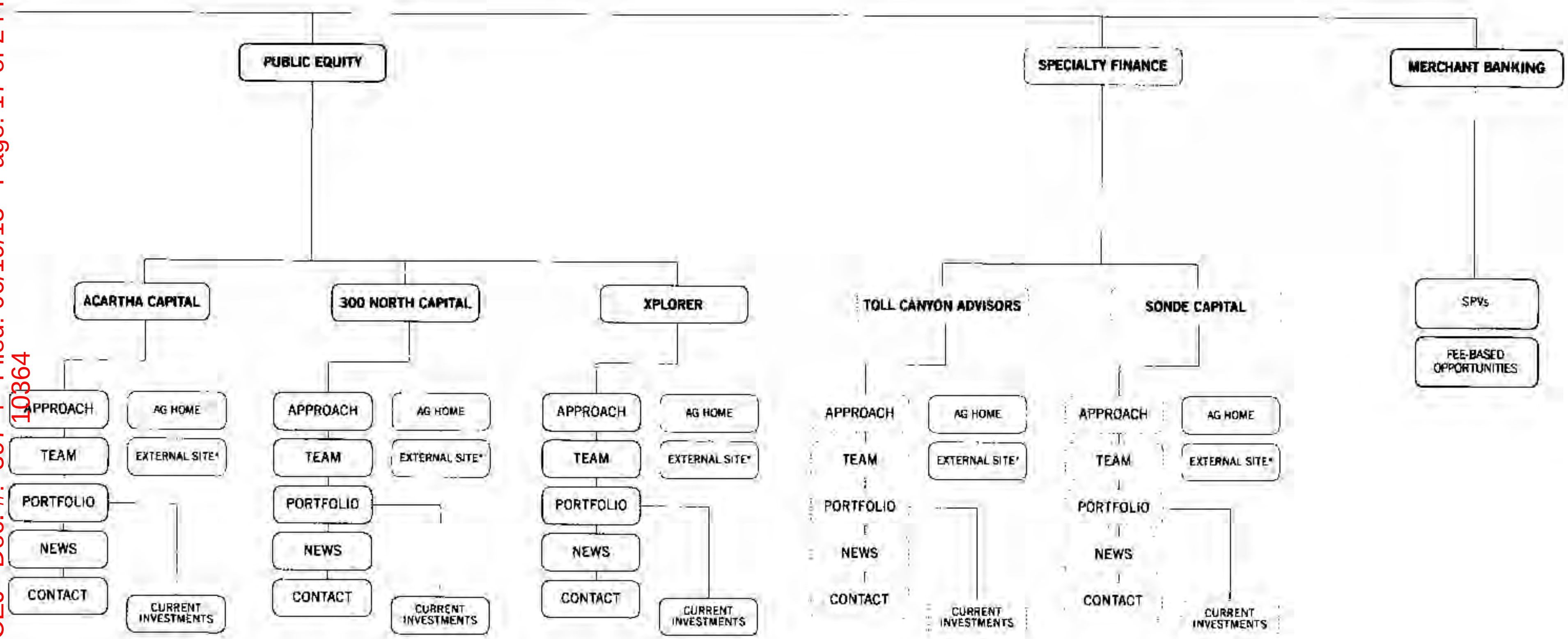
Bill Lawlor, CEO
blawlor@blinkmkg.com

Blink Team:
Bill Lawlor: Account Director
Sean Bates: Chief Creative Lead
Attila Kelemen: Chief Strategist, Account Director
Carson McComas: Technical Director, Technical Programming, SEO/SEM
Cynthia Miller: Graphic Designer
Lisa Schneider: Director, SEO/SEM and Social Media Strategies
Steve Morenberg: Creative Director, Copy
Chris Jones: Animation Designer
Yrving Torrealba: Creative Director, Flash, Animation & Emerging online technologies
Dane Hansen: Creative Director, Flash & Emerging online technologies

A.1
Corporate Website Sitemap



b



* Connectivity to external site if a site is available

blink

Invoice

Blink Marketing Group
101 Chatham Road
Fairfield, CT 06825
www.blinkmkg.com
203-856-8353

Date	Invoice #
6/5/2011	1015

ID#: 20-8075318

Acartha Group
Doug Morriss, Chairman & CEO
7820 Maryland Ave.
Clayton, MO 63105

Description	Rate	Amount
Presentation & External Communication System - Raw Materials for Acartha Group Presentation and External Communications. Cover system and paper supplies. 1,200 sheets Gmund Kaschmire Blue Cotton Paper (27.5 x 39.3)	2,244.00	2,244.00

Total Due	$2,244.00

blink

Invoice

Blink Marketing Group
101 Chatham Road
Fairfield, CT 06825
www.blinkmkg.com
203-856-8353

	Invoice #
5/8/2011	1017

ID#: 20-8075318

Acartha Group
Doug Morriss, Chairman & CEO
7820 Maryland Ave.
Clayton, MO 63105

Description	Hours	Price Each	Amount
Acartha Capital & ATP2 Investment Presentations - Project delivered 5/7/2011			
- Design, execution and management of introductory presentation systems. Project included presentation cover design and production management, design and creative for Acartha Capital and ATP4	87.5	200.00	17,500.00

Total Due $17,500.00

blink

Invoice

Blink Marketing Group
101 Chatham Road
Fairfield, CT 06825
www.blinkmkg.com
203-856-8353

	Invoice #
6/21/2011	1025

ID#: 20-8075318

Acartha Group
Doug Morriss, Chairman & CEO
7820 Maryland Ave.
Clayton, MO 63105

Description	Hours	Price Each	Amount
Capital Recap Presentation Creation of Design and Production of pdf, on-screen and printed original presentation production	37	200.00	7,400.00

Total Due $7,400.00

blink

Invoice

18 South Main Street, 3rd Floor
South Norwalk, CT 06854
p. 203.856.8353
e. blawlor@blinkmkg.com

Date	Invoice #
7/21/2011	AG_1019

Bill To

Doug Morriss
Chairman & CEO
Acartha Group
7820 Maryland Avenue
Clayton, MO 63105

Pay to The Order Of

Blink

Payment Wire Information

Webster Bank
219 Town Green, Wilton CT 06897
ABA Routing Number: 211170101
Account Number: 10216943
Name on Account: BLINK

EIN: 20-8075318

Description		Rate	Amount Due
Acartha Group Presentation Printing, Assembly & overnight fees			$8,950.00
Payment Terms Due upon receipt		Total	$8,950.00

blink

Invoice

18 South Main Street, 3rd Floor
South Norwalk, CT 06854
p. 203.856.8353
e. blawlor@blinkmkg.com

Date	Invoice #
11/11/2011	AG_1043

Bill To
Doug Morriss Chairman & CEO Acartha Group 7820 Maryland Avenue Clayton, MO 63105

Pay to The Order Of
Blink
Payment Wire Information
Webster Bank 219 Town Green, Wilton CT 06897 ABA Routing Number: 211170101 Account Number: 10216943 Name on Account: BLINK

EIN: 20-8075318

Description		Rate	Amount Due
Acartha Group Site Under Construction Page Development **2 hours**		$200/hr	$400.00
Payment Terms Due upon receipt		Total	$400.00

blink

18 South Main Street, 3rd Floor
South Norwalk, CT 06854
p. 203.856.8353
e. blawlor@blinkmkg.com

Invoice

Date	Invoice #
11/11/2011	AG_1044

Bill To

Doug Morriss
Chairman & CEO
Acartha Group
7820 Maryland Avenue
Clayton, MO 63105

Pay to The Order Of

Blink

Payment Wire Information

Webster Bank
219 Town Green, Wilton CT 06897
ABA Routing Number: 211170101
Account Number: 10216943
Name on Account: BLINK

EIN: 20-8075318

Description		Rate	Amount Due
Recap Deck Modifications delivered 10.24.2011 **3 hours**		$200/hr	$600.00
Payment Terms Due upon receipt		Total	$600.00

THOMPSON COBURN LLP

Jayna Marie Rust
P 202.585.6929
F 202.318.6496
jrust@thompsoncoburn.com

Licensed in Virginia only.
(supervised by DC licensed attorneys)

September 17, 2014

VIA FIRST CLASS MAIL

Attn: Kevin M. Lynch, CFO
Blink Marketing
18 South Main Street, 3rd Floor
South Norwalk, CT 06854

Re: Blink Marketing's inquiry into Acartha Group, LLC bankruptcy claim

Dear Mr. Lynch:

Thompson Coburn LLP is in receipt of your letter dated September 2, 2014. The letter inquired into the status of "Blink Marketing's claim in the Acartha bankruptcy proceeding" and asked us to provide you with a claim number that has been assigned to your claim. There is no Acartha bankruptcy proceeding occurring, and the court-appointed Receiver did not receive a claim from Blink Marketing in the receivership proceedings. The Receiver informed you of the procedures for filing a claim in the receivership proceeding and also informed you of the claims bar date (May 6, 2013) through a notice sent on March 29, 2013. If Blink Marketing filed a claim in the receivership proceeding, please promptly forward the claim to us along with documentation showing receipt of that claim by the Receiver.

For more information about the claims process, please visit the Acartha Receivership Information public website: http://www.thompsoncoburn.com/news-and-information/acartha-receivership-information.aspx.

Very truly yours,

Thompson Coburn LLP

J.M. Rust

By
Jayna Marie Rust

Exhibit E

LAWRENCE W. ANDREA
ATTORNEY AT LAW

127 KENT HOLLOW ROAD
KENT, CONNECTICUT 06757

TELEPHONE (860) 927-3372
TELECOPIER (860) 927-3375
www.LawrenceWAndrea.com
E-MAIL: counsel@LawrenceWAndrea.com
ADMITTED IN CT AND NY

April 16, 2015

VIA EMAIL ONLY

Receiver Claire M. Schenk
Acartha Group Receivership
505 North 7th Street
Saint Louis, Missouri 63101
(acartha.receivership@thompsoncoburn.com)

with a copy to:

Jayna Marie Rust, Esq. (JRust@thompsoncoburn.com)

Re: *SEC v. Morriss, et al.*, 4:12-cv-00080-CEJ
Notice of Disagreement, Claim No. 227
Blink Marketing Group, LLC ("Blink"), Norwalk, CT

Dear Ms. Schenk:

This letter is delivered to you on behalf of Blink Marketing Group, LLC ("Blink") of Norwalk, Connecticut in response to Jayna Rust's letter to me of March 24, 2015, wherein on your behalf she provided rebuttal to Blink's Notice of Disagreement and requested, again, more information. I will not continue the debate as to why Blink's claim should be paid in full, the reasons for which have been made abundantly clear in prior correspondence and in the Notice of Disagreement, reference to all of which is made hereby. Instead, this letter serves to transmit even more information to you, information that supports Blink's meritorious claim.

Included with this letter as separate attachments are:

1. A folder of files that make up the Acartha Group "Under Construction" Web page, the page that was up and effective at the time you became Receiver (as Blink has already told you). This should remove any remaining doubts you have articulated about this part of Blink's claim. Blink deserves the $400.00 it seeks for the Web page.

2. A seven-page document entitled, "Site Needs Overview". When you bring up this document in Adobe, go to File, scroll to Properties and note that the document was created on

August 1, 2011. This is further evidence that, just as Blink has been telling you, it worked on the Acartha project, earned at least its 50% fee as set out in the contract and agreed to by Mr. Morriss, and deserves to be reimbursed.

As I have informed you previously (as did Mr. Lawlor in his January 22, 2015 affidavit supporting Blink's claim (see paragraph 9)), Blink changed computer systems subsequent to its Acartha work and cannot, after even more effort to recover the information, locate and re-call past email messages. So, it does not have that sort of proof. But, as Blink has argued before, it should not have to. It has provided at least 11 exhibits in addition to those attached to its initial claim. Blink has a reasonable expectation that the Court will agree with it, should an appeal for review be filed.

One last, related, note: your citation to *Sec. Exch. Comm'n v. Merrill Scott & Assocs., Ltd.* in your last correspondence is far off base: that case had more to do with a mischaracterization of the claimant's claim that it did with the inadequacy of production. I do note that the court in denying relief nevertheless was very sympathetic to the claimant (which, it was noted, recovered a lot of its loss from a related entity). I suspect that the Court here will likewise be very sympathetic to Blink Sympathy aside, the law and the significant production Blink has made should lead to a full award.

Please do not hesitate to contact me should you have any questions. As I have written before, despite Blink's strong disagreement with your determination, it appreciates the difficult job you have. It has been a pleasure to work with Ms. Rust.

Sincerely,

Lawrence W. Andrea

Attachments

cc: William Lawlor
Kevin M. Lynch

Exhibit F

From:	Bill Lawlor
To:	Doug Morriss
Sent:	8/2/2011 7:13:44 AM
Subject:	Website overview resend
Attachments:	Acartha-SiteNeeds.pdf

Here ya go.
B

Bill Lawlor | 203.856.8353
Blink 2000 Post Road Suite 205 | Fairfield CT 06824 | www.blinkmkg.com

Site Needs Overview

Acartha Group

ACARTHA
GROUP

Site Needs Overview

What We Currently Have

1. Privacy Policy
2. Terms of Use
3. News
   - Archive 2007–2009?
   - Break up archived content at the group level?
4. Leadership, with Bios
   - *Management* for Acartha
   - *Advisory* for Acartha
   - *Fund Managers* for all

Site Needs Overview

Content Needs By Category

ACARTHA GROUP

Firm Overview
Approach
Methodology
Overview for Private Equity, Real Estate, Public Equity, and Specialty Finance

ATP2

Overview
Fund Vitals
Approach
Executive Team
Portfolio
News
Contact

SATURDAY CAPITAL

Overview
Fund Vitals
Approach
Executive Team
Portfolio
News
Contact

DOMUS

Overview
Fund Vitals
Approach
Executive Team
News
Contact

VIVA

Overview
Fund Vitals
Approach
Executive Team
Portfolio
News
Contact

LIFELINE CAPITAL

Overview
Fund Vitals
Approach
Executive Team
Portfolio
News
Contact

ACARTHA CAPITAL

Overview
Fund Vitals
Approach
Executive Team
Portfolio
News
Contact

300 NORTH CAPITAL

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XPLORER

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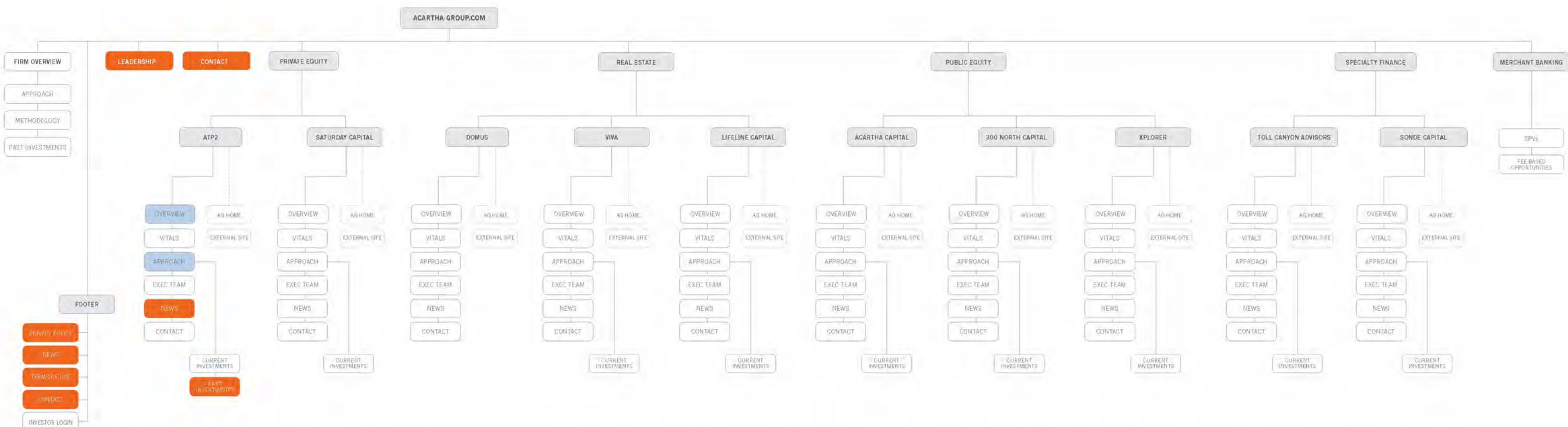
MERCHANT BANKING

Overview of SPVs
Overview of Fee-Based Opportunities

Site Needs Overview

Planned Sitemap



WHAT WE HAVE | WE HAVE BUT NEEDS WORK | WHAT WE NEED | INDICATES LINK | INDICATES CONTENT AREA

ACARTHA GROUP

Site Needs Overview

Initial Questions

FOR DISCUSSION WITH DOUG MORRISS

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ACARTHA GROUP

Site Needs Overview

What We Need

FROM FUND MANAGERS

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FOR DISCUSSION / MORE INFO

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   c. Fund size
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Include email contact info for executive team?

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   a. Logo
   b. Company Summary
   c. Link to external site, if applicable

What if fund does not yet have current investments?

6. News
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If nothing, begin with launch announcement?

7. Contact
   a. Contacts by Function
   b. Corporate HQ
   c. Office Locations
   d. Address / Phone / Fax / Email / URL

Sample Questionnaire

For Fund Managers

FUND MANAGERS WILL RECEIVE A LINK TO AN ONLINE FORM TO FACILITATE SUBMISSION OF INFO TO BLINK.
BELOW IS A SAMPLE FORM LAYOUT:

FUND OVERVIEW

Please enter an Executive Summary for the fund.

FUND VITALS

Area(s) of Focus

Please list the fund's area or areas of investment focus.

Typical Investments

Please list some of the fund's typical investments.

Fund Size

Please provide information on fund size.

Fund Term

Please provide information on fund term.

EXECUTIVE TEAM

Name and Bio #1

Please enter a the name of the Executive Team member, and a brief biographical statement.

Name and Bio #2

Please enter a the name of the Executive Team member, and a brief biographical statement.

Exhibit G

From:	Bill Lawlor
To:	Doug Morriss
Sent:	8/12/2011 1:34:32 PM
Subject:	Stuff for call
Attachments:	Acartha_2011Website_SOW[2].pdf; Acartha-SiteNeeds[4].pdf

Bill Lawlor | 203.856.8353
Blink 2000 Post Road Suite 205 | Fairfield CT 06824 | www.blinkmkg.com

2011 Website Redesign

Acartha Group

07.26.2011

blink

1.0
Project Scope

Acartha Group has requested a scope of work, deliverables and related costs for the strategic development, design and execution of its new corporate website.

The project scope consists of the following components:

2.1 Corporate Website
2.2 Mobile-Aware Functionality
2.3 Online Investor Communication Platform

Timeline: 8 - 12 Weeks in total.
Blink will provide Acartha Group with a detailed project timeline upon project engagement.

2.1
Corporate Website

The Acartha Group online environment must interactively share information, integrate with new and existing technology systems, and align with overall corporate messaging and business strategy. From a creative perspective, the corporate website must evoke emotion and magnify the Acartha Group brand identity.

Blink uses leading web tools and languages, including: HTML 5, HTML, XML, Java, JSP, Cold Fusion, ASP, PHP, DB2, Oracle, MySQL, SQL Server, streaming media, and Flash.

The following is Blink's typical process for web development, structured to ensure that all design and development meet client expectations (some stages may not apply to this project).

EXECUTIVE BRIEFINGS
COMPETITIVE AND INDUSTRY REVIEW
MESSAGE DEVELOPMENT

WIREFRAME / NAPKIN CREATION

GRAPHIC DESIGN
CONTENT GATHERING

CODING AND PROGRAMMING
APPLICATION INTEGRATION
CONTENT MANAGEMENT STRATEGY

SERVER CONFIGURATION
CONTENT LOADING
TESTING

Blink will engage with multiple Acartha Group executives at various levels to create and deliver a website that meets the project's requirements and objectives. Acartha Group's website will require strategy, architecture development, copy development, graphic design, and technical services surrounding site coding, and content loading, testing and privacy considerations.

The site will be based on the sitemap found in Appendix A (A.1)

Deliverables:

- Briefings and communication strategy
- Architecture and navigation development
- Wireframe creation
- Graphic design and preparation
- 2 rounds of concept modifications
- Coding based on site requirements
- Content Management System integration
- SEO Configuration
- Site entrance programming
- First draft copy to be provided by client
- Copy editing and proofing
- Content loading
- Testing and refinement
- Site launch
- Project Management

- CMS license as well as Hosting and maintenance recommendations will be provided (hosting services are available if necessary)
- An additional SOW and costs will be provided for photography selection and usage based on recommendations, client selection and approval

2.2
Mobile-Aware Functionality

The delivery of Acartha Group's website based on device platform will present Acartha as a forward-thinking firm that utilizes the most current technologies to deliver a clean, clear and precise message.

The goal of mobile-aware development is the creation of a responsively designed website. Responsive web design means creating an adaptive design that's aware of the context it's viewed in and optimizes its display accordingly. Using a common set of content, and code - responsive design provides the following benefits. (This is a short list, but the benefits are significant.)

- When content needs to be updated, it's updated one time, in one location, and that change is reflected on every device and screen size
- Web page designs adapt dynamically to any screen size to present a layout that is appropriate to the device, be it a phone, a tablet, or a large monitor, a TV, etc. Consideration for those different devices is built into the design from the start
- URL structure (and therefore links, which might be shared, or crawled by search engines) work universally across all devices and screen sizes
- We don't need to revise or create a new website to adapt to each new device or screen resolution that comes out, one website will serve them all now, and in the future
- It also takes into account a few things like providing, phone links for phone numbers, and it responds to orientation changes on devices

2.3
Online Investor Communication Platform

Acartha Group has the need to communicate and provide documents, as a private experience, to its client community in a secure environment. Blink will work with Acartha Group executives to define specific requirements to customize the environment based on the following parameters outlined below:

Online investor login area:

- Username and password entrance
- Permission based content delivery
- Custom reporting functionality
- Complete brand integration

- Hosting, security and maintenance recommendations will be provided (hosting services are available if necessary)

The online investor login area will be based on the sitemap and functionality found in Appendix A.2.

4.0
Project Component Costs

This proposal contains estimated costs based on a fixed bid in accordance with existing project scope.

Design, Development and Execution

→ Corporate Website	$ 55,000.00
→ Mobile-Aware Functionality	$ 20,000.00
→ Online Investor Communication Platform	$ 15,000.00

**Estimated costs do not include costs associated with the research, collection or acquisition of photography, image license fees, printing, and/or paper, web hosting, licensing of third-party applications, or commerce components, such as secure certificates, payment gateways, or merchant accounts. Estimated costs do not include costs associated with trademark or copyright research and applications, postage or overnight delivery fees or international calls. Which if required, the client agrees to pay as an additional fee. All line items do not include any travel costs that may be associated with the project, which, if incurred, shall be paid for by the client.*

5.0
Approval

Budgetary Approvals:

All project costs are based on fixed cost basis determined by current needs described by the Acartha Group team. If the project extends past the project scope or the agency estimated project hours, due to specific requests made by the client during the development process, the agency will notify Acartha Group and provide the client with an adjusted scope of work including details pertaining to additional project hours and costs for which the client understands and agrees to pay additional related fees.

A deposit of 50% of the project costs will be required to initiate the project. Upon creative review and approval, Blink will deliver an invoice for a second payment of 25% for each project component. The balance of the project cost (25%) and any associated additional costs will be due upon delivery of each project component.

Pricing reflects agency fees and does not include costs associated with the collection, or acquisition, of photography, image license fees, printing, and/or paper, web hosting, licensing of third-party applications, or commerce components, such as secure certificates, payment gateways, or merchant accounts. Estimated costs do not include costs associated with trademark or copyright research and applications, postage or overnight delivery fees or international calls, which if required, the client agrees to pay as an additional fee.

All line items do not include any travel costs that may be associated with the project, which, if incurred, shall be paid for by the client.

EXECUTED AND AGREED TO BY THE PARTIES HERETO:

Blink

Bill Lawlor
2000 Post Road, Suite 205
Fairfield CT 06824

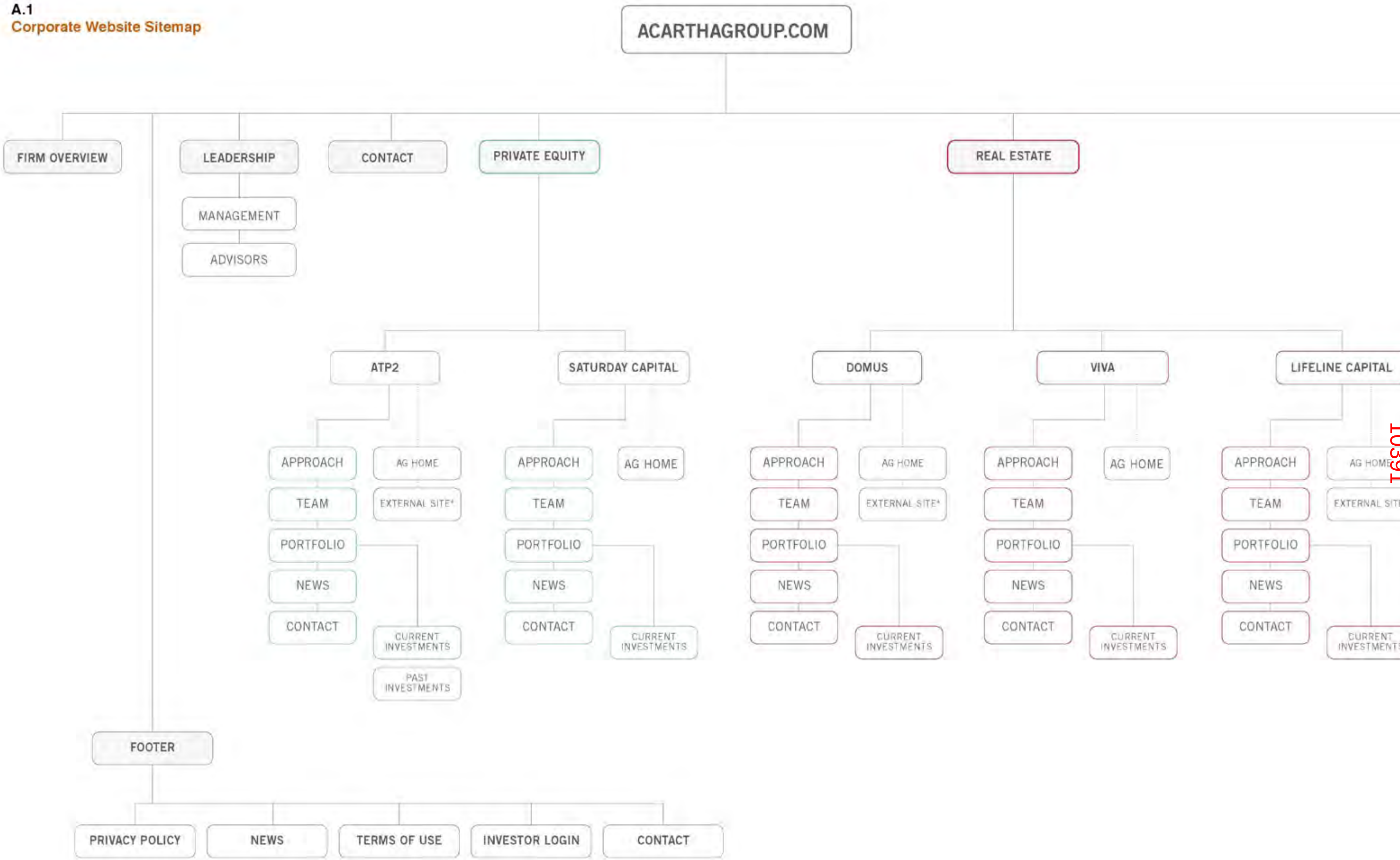
Acartha Group

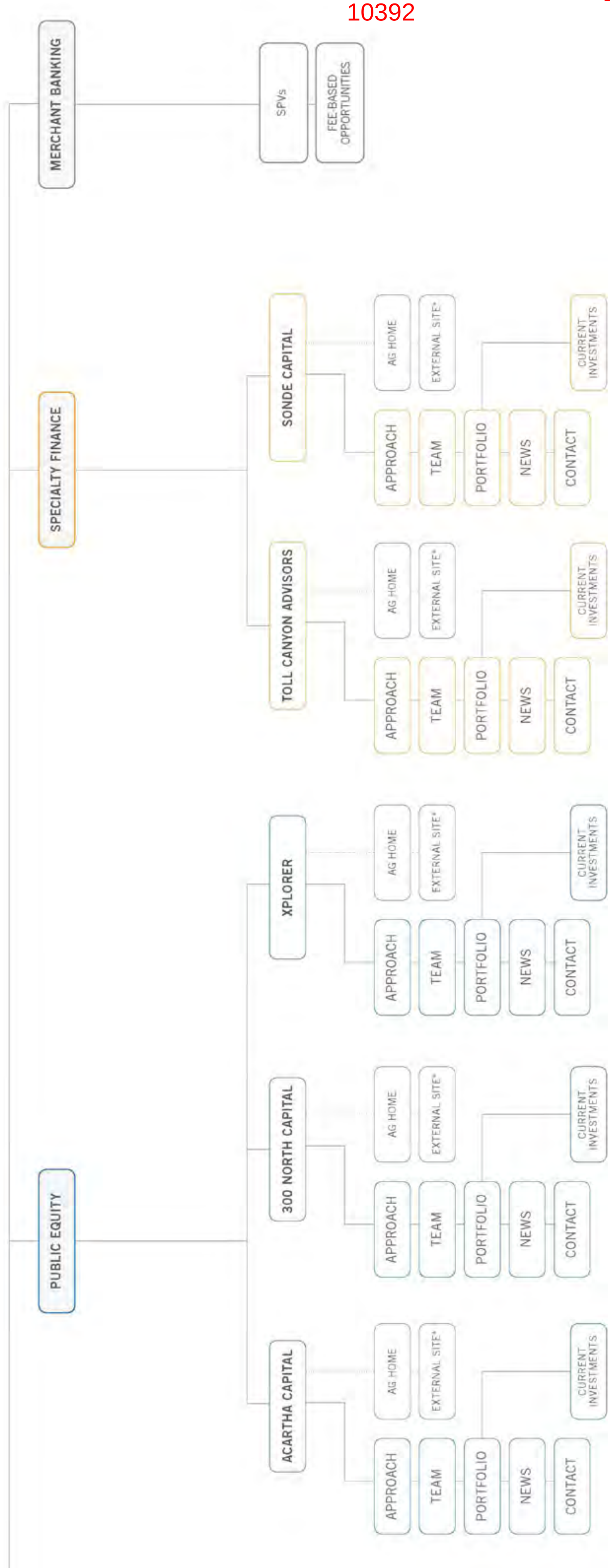
Doug Morriss, Chairman & CEO

Signature ______________________

Date:

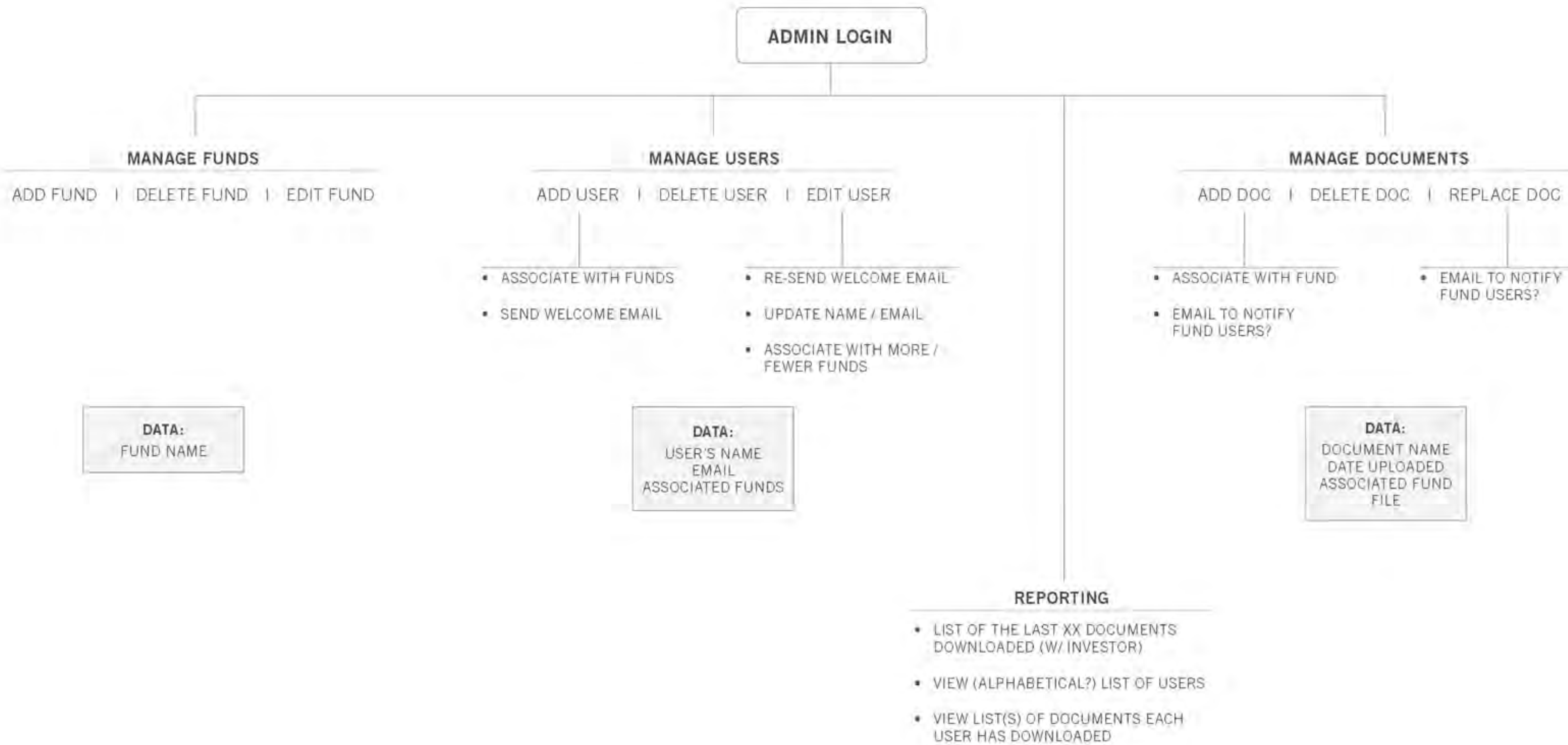
A.1
Corporate Website Sitemap





* Connectivity to external site if a site is available.

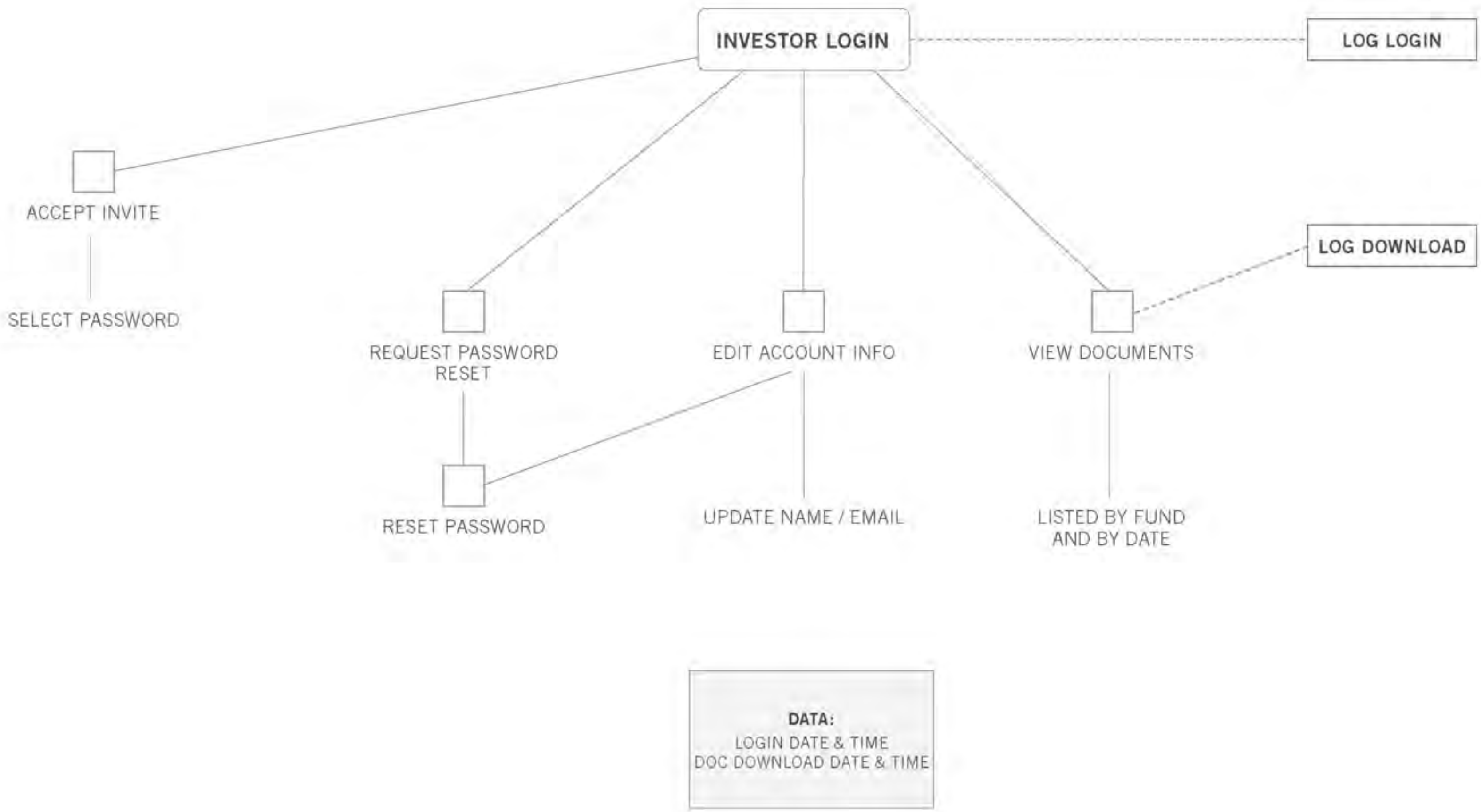
A.2
Online Investor Communication Platform
Administrative Workflow



A.2

Online Investor Communication Platform

User Experience Workflow



A.3
Agency Overview

Blink, a sales & marketing communications agency, combines strategic planning, award winning design, brand strategies and leading technologies to deliver complete sales and marketing communication solutions for our clients. Headquartered in Fairfield CT, the agency focuses on three primary areas: executive communications, brand and marketing communications, and the integration of marketing programs within our client's sales processes geared towards increasing top-line revenue growth and driving efficiencies throughout the sales cycle.

Blink performs these services for companies such as LogicSource, Acartha Group, Y&R, LG, RelaDyne, TransPerfect, Touch Commerce, Domus, Winderemere Island, VGS Creative, LifeCare, Iconoculture, DSA Encore, Kidd & Company, Wolf Means Business, Vumber, Coastal Construction Group, SCI Worldwide, Story (formally Byte Interactive), RK Marketing and Cava Capital.

Contact information:
Blink
20 Marshall Street
Suite 105
South Norwalk, CT 06854
203.856.8353
www.blinkmkg.com

Bill Lawlor, CEO
blawlor@blinkmkg.com

Blink Team:
Bill Lawlor: Account Director
Sean Bates: Chief Creative Lead
Attila Kelemen: Chief Strategist, Account Director
Carson McComas: Technical Director, Technical Programming, SEO/SEM
Cynthia Miller: Graphic Designer
Lisa Schneider: Director, SEO/SEM and Social Media Strategies
Steve Morenberg: Creative Director, Copy
Chris Jones: Animation Designer
Yrving Torrealba: Creative Director, Flash, Animation & Emerging online technologies
Dane Hansen: Creative Director, Flash & Emerging online technologies

Site Needs Overview

Acartha Group

ACARTHA
GROUP

Site Needs Overview

What We Currently Have

1. Privacy Policy

2. Terms of Use

3. News
   - Archive 2007–2009?
   - Break up archived content at the group level?

4. Leadership, with Bios
   - *Management* for Acartha
   - *Advisory* for Acartha
   - *Fund Managers* for all

ACARTHA GROUP

Site Needs Overview

Content Needs By Category

ACARTHA GROUP

Firm Overview
Approach
Methodology
Overview for Private Equity, Real Estate, Public Equity, and Specialty Finance

ATP2

Overview
Fund Vitals
Approach
Executive Team
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SATURDAY CAPITAL

Overview
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DOMUS

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VIVA

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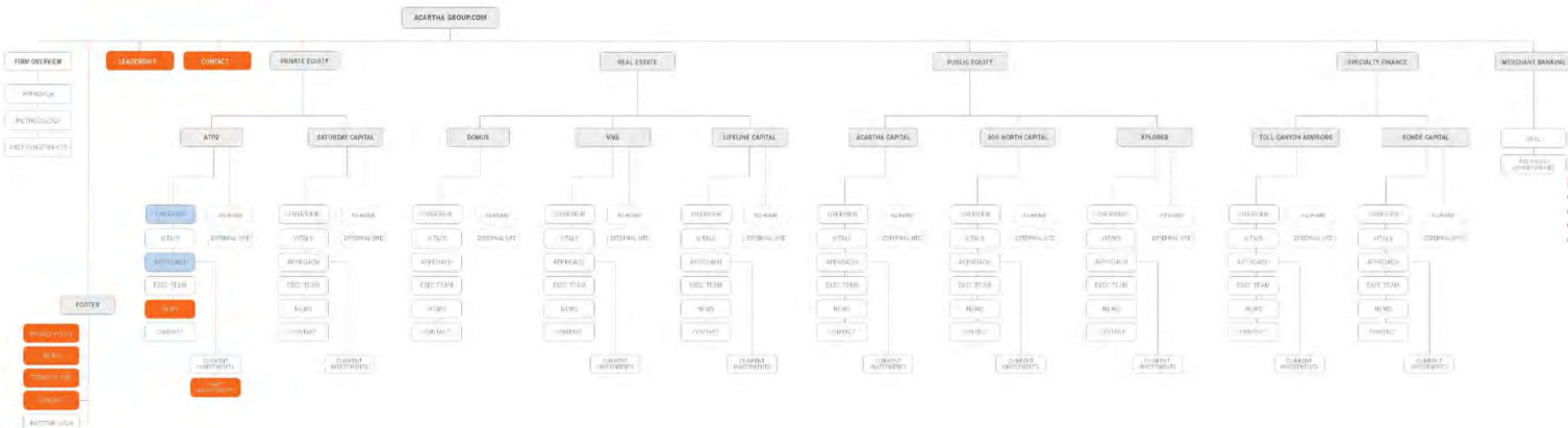

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