

# EXHIBIT A

Monitor's Preliminary Report

EXHIBIT A

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*Federal Trade Commission v. International Markets Live, Inc., et al.*  
U.S. District Court (D. Nev.)  
Case No. 2:25-cv-00760-CDS-NJK

**MONITOR'S PRELIMINARY REPORT**

Thomas W. McNamara  
Regulatory Resolutions  
655 West Broadway, Suite 900  
San Diego, California 92101  
Telephone: 619-269-0400  
Facsimile: 619-269-0401  
Monitor

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I.

**INTRODUCTION**

I was appointed monitor of the Monitored Entities by the Preliminary Injunction entered August 11, 2025, and that appointment was confirmed by the Modified Preliminary Injunction entered August 18, 2025 (“PI”). ECF No. 111. The Court directed the Monitor to present preliminary investigative and status findings by October 6, 2025. *See* PI XV.<sup>1</sup> Set forth below are our preliminary findings with supporting documents attached as exhibits. Also attached as **Exhibit 1** is our forensic accountants’ Accounting Review and Summary for the years 2013-2025.

II.

**SUMMARY OF FINDINGS**

International Markets Live, Inc. (“IML”)<sup>2</sup> shuttered operations after this lawsuit was filed. Despite bringing in \$1.3 billion in revenue over some 12 years, IML had a mere \$56,000 in cash assets in a bank account at the end of August. Our review confirms where the money went – to IML’s owners, Individual Defendants Christopher and Isis Terry (the “Terrys”). The Terrys extracted substantially more than \$100 million over the life of the business to fund an extravagant lifestyle and purchase more than \$94 million in elite real estate properties.<sup>3</sup> Christopher Terry pulled out substantially more than \$50 million of cryptocurrency from IML, which he deployed as he saw fit, but now claims only \$2,000 in cryptocurrency remains. For her

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<sup>1</sup> Section XV directs the Monitor to present findings to the Court, including reporting on four areas: (A) the Monitored Entities’ compliance with this order; (B) an accounting of the Monitored Entities’ financial transactions as they relate to the practices charged in the Complaint or Defendants’ Products; (C) a description of the Monitored Entities’ corporate structures including all parents, subsidiaries, divisions, affiliates, and all ownership interests of the Monitored Entities; and (D) a determination of whether the Monitored Entities can be continued legally and profitably.

<sup>2</sup> We use IML to encompass “Corporate Defendants (International Markets Live, Inc., also d/b/a IYOVIA, iMarketsLive, IM Mastery Academy, and IM Academy; IM Mastery Academy Ltd., f/k/a International Markets Live Ltd.; and Assiduous, Inc., and their affiliates, subsidiaries, successors and assigns.” PI, Definitions C.

<sup>3</sup> The lifestyle included private jets, opulent hotels, private chefs, drivers, house teams, and luxury goods. The real estate included luxury homes and condos in New York, Miami, Dubai, and Las Vegas and more than 20 buildable lots in an upscale Las Vegas development.

1 part, Isis Terry claimed she had no memory of using millions of dollars in cryptocurrency and  
2 direct and indirect transfers from IML to fund her lifestyle.

3 There is much to investigate and understand about the Monitored Entities' finances and  
4 assets – and those of the Terrys which are inextricably intertwined. And we have made progress,  
5 particularly as it relates to the real property assets. But we must report that Defendants – both  
6 the Monitored Entities and the Individual Defendants themselves – have materially hindered our  
7 ability to complete the Monitor duties assigned by the PI. Defendants have not provided  
8 unfettered and immediate access to IML records and documents required by the PI and necessary  
9 for the Monitor team to carry out their duties. Instead, Defendants have dribbled materials in  
10 over the last two months. The Terrys have been overtly uncooperative and have failed to provide  
11 fulsome and truthful Financial Disclosures. While both sat for depositions, their testimony lacks  
12 credibility and is directly contradicted by documents compiled by the Monitor team. *See*  
13 *generally Exhibit 2* (Excerpts of Chris Terry's Deposition Transcript) and *Exhibit 3* (Excerpts  
14 of Isis Terry's Deposition Transcript).<sup>4</sup> Their testimony also demonstrates a disrespect for the  
15 Court's Orders, and, it appears, an obstinate refusal to abide by them.

16 Given the Terrys' efforts to hide and shield assets (described below), the Defendants'  
17 non-compliance with the PI, the Terrys' brazen lack of candor, and the foreign situs of many  
18 millions in real property acquired with IML funds, there is no way to assure the Court that we  
19 have identified all assets or that the current PI adequately empowers the Monitor to secure the  
20 Defendants' cooperation and the ability to preserve such assets for the benefit of defrauded  
21 consumers should Plaintiffs prevail.

### 22 III.

#### 23 ADDITIONAL MONITORED ENTITIES

24 The PI defines "Monitored Entities" to mean Corporate Defendants (International  
25 Markets Live, Inc., also d/b/a IYOVIA, iMarketsLive, IM Mastery Academy, and IM Academy;  
26 IM Mastery Academy Ltd., f/k/a International Markets Live Ltd.; and Assiduous, Inc., and their

27 \_\_\_\_\_  
28 <sup>4</sup> Because the deposition of Ms. Terry was taken only week ago, only the rough transcript was available.

1 affiliates, subsidiaries, successors and assigns) “and any other entity that has conducted any  
2 business related to the marketing or sale of Defendants’ Products, including receipt of assets  
3 derived from any activity that is subject of the Complaint in this matter, and that the Monitor  
4 determines is controlled or owned by any Defendant.” PI, Definitions ¶ K.

5 My team’s initial review of accounting and bank records identified additional corporate  
6 entities which received IML proceeds and are under the common control and ownership of  
7 Individual Defendants Chris and Isis Terry, and as such, qualified as Monitored Entities under  
8 the PI. On September 12, 2025, I wrote to the parties to indicate that based on the above, I  
9 designated the following entities as Monitored Entities subject to the PI: Afflatus Holdings, LLC;  
10 Auspicious Irrevocable Trust dated February 10, 2019 (“Auspicious Trust”); Dominant  
11 Consulting Group, LLC; Felicitous Charm, LLC; Harmonic Waves Holding LLC; Reverie State  
12 LLC; and Terra Firma Development, LLC. *See Exhibit 4.*

13 As explained in my September 12 letter, we had previously agreed with defense counsel  
14 that they would have five business days to challenge the designation with the Court. We met and  
15 conferred with defense counsel on September 16 to discuss the basis for the determination. On  
16 the fifth day after receiving the letter, defense counsel wrote to indicate they did not represent  
17 any of the newly-identified Monitored Entities and would not challenge the designation. More  
18 recently, separate counsel appearing for certain of the entities – Auspicious Trust, Dominant  
19 Consulting Group, LLC, and Terra Firma Development, LLC – advised our office that they  
20 intend to challenge those Monitored Entity designations.

21 Based on additional investigation and review of materials, today I provided notice to the  
22 parties that we have designated additional Monitored Entities.<sup>5</sup> *See Exhibit 5.*

23 ///

24 ///

25 ///

26 \_\_\_\_\_  
27 <sup>5</sup> Orphic LLC; Majestic Positano LLC; Royal Roma LLC; St. Croix, LLC; City View Heights,  
28 LLC; Big Agency EAU Marketing L.L.C.; RealInvest GCC Active Limited; Shauna DWC-LLC;  
Rainmaker Capital Investments L.L.C.; Effloresce World LLC; Terra Firma Development and  
Construction, LLC; and Terra Firma Design Build, LLC.

1 IV.

2 **THE DEFENDANTS ARE NOT IN COMPLIANCE WITH THE PRELIMINARY**  
3 **INJUNCTION**

4 With limited exceptions, the Monitored Entities – and particularly Individual Defendants  
5 Chris and Isis Terry who control the entities – have violated express provisions of the PI.<sup>6</sup> Their  
6 overall lack of cooperation has impeded the Monitor team’s performance of the duties set out by  
7 the Court. After roughly a month of little to no progress, we resorted to the PI’s expedited  
8 discovery provision to depose Chris and Isis Terry. As described below, their testimony was not  
9 credible.

10 In issuing the PI, the Court found good cause to believe irreparable harm would result  
11 from the Defendants’ ongoing violations of the FTC Act, the Telemarketing Sales Rule, and  
12 other laws and regulations, and good cause to believe immediate and irreparable damage to the  
13 Court’s ability to grant effective final relief for consumers will occur from the disposition or  
14 concealment by Defendants of their assets or records unless immediately restrained. PI at 3  
15 (Findings ¶¶ D and E). For those reasons, the Court appointed a Monitor, placed a limited freeze  
16 on the Corporate Defendants’ assets, required preservation of the Individual Defendants’ assets,  
17 granted immediate access to the Defendants’ business premises, and permitted the Plaintiffs and  
18 the Monitor to take expedited discovery. *Id.* (Finding ¶ F).

19 The Court also imposed multiple obligations on the Defendants to cooperate and provide  
20 documents needed for the Monitor to complete the assigned duties.<sup>7</sup> Defendants have failed to  
21 comply, specifically as discussed below.

22 ///

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23 <sup>6</sup> The exceptions are as follows: they have ceased operations and therefore are not engaging in  
24 any of Prohibited Activities in Section I; they do not appear to have released any confidential  
25 consumer information prohibited by Section II; they provided access to business premises  
required by Section XX; and the Terrys appeared for depositions pursuant to the Monitor’s  
expedited discovery powers.

26 <sup>7</sup> For example, the Court required the preservation of records (Section III) and assets (Sections  
27 IV, V and VI), and also the submission under oath of Financial Disclosures and Foreign Asset  
28 Disclosures (Sections VIII and IX). Defendants were required to “immediately upon request”  
provide to the Monitor a number of enumerated categories of documents and information. *See*  
Section XVI Provision of Information to the Monitor.

1           1.       Preservation of Records (PI, Section III)

2           The failure to produce the majority of business records required by the PI (discussed  
3 below) and the conduct of Chris Terry and Isis Terry (discussed below) suggest that records may  
4 not have been preserved.

5           2.       Preservation of Assets (PI, Sections IV-VII)

6           Sections IV-VII prohibit the Monitored Entities from transferring, liquidating, otherwise  
7 dissipating, or disposing of the Assets of the Individual and Corporate Defendants.

8           Defendants’ multiple compliance failures prevent a determination of whether all assets  
9 have been preserved. The extensive use of cryptocurrency (routinely unreported on the IML and  
10 Terry tax returns) and the Terrys’ widespread conversion of cryptocurrency to cash (to buy real  
11 estate, yachts, automobiles, luxury goods, and passports to the Republic of Vanuatu) raise  
12 significant concerns. These concerns are heightened by Mr. Terry’s self-aggrandizing texting  
13 about his crypto investing prowess. *See Exhibit 6* (telling his real estate agent on the last page  
14 of the text, “I took \$120m did crypto investment around the world and with u around \$30m).  
15 Even more troubling, Mr. Terry bragged about his practice of converting Bitcoin so it is not  
16 “tra[[c[e]able” and can “bypass regulations and taxes...” *See Exhibit 7*.

17           3.       Financial Disclosures (PI, Section VIII)

18           The PI required each Corporate Defendant and each Individual Defendant to deliver  
19 completed Financial Disclosures to the Monitor by ***Tuesday, August 26, 2025***.<sup>8</sup>

20           None of the Corporate Defendants has complied with this requirement as of the date of  
21 this report. This failure has been repeatedly raised with defense counsel, and the FTC filed an  
22 Order to Show Cause Motion seeking to compel production, followed by numerous meet-and-  
23 confer meetings. Nonetheless, the required disclosures have yet to be provided.

24           The Individual Defendants have made minimal efforts to comply. On August 21, 2025,  
25 Defendants produced a skeletal unsworn “IML/Christopher Terry/Isis Terry List of Asset.” *See*

26 \_\_\_\_\_  
27 <sup>8</sup> The original PI, ECF No. 104, required completed Financial Disclosures be produced within  
28 five days, or August 16, 2025. However, the parties agreed to extend the period to eight days in  
the modified PI, ECF No. 111, which extended the disclosure date to August 26, 2025, eight  
days after the modified PI was entered.

1 **Exhibit 8.** When they did not timely produce their Disclosures, the FTC filed its OSC motion.  
2 *See* ECF No. 115. The Court denied the motion (ECF No. 122) but made clear that partial  
3 compliance would be insufficient and ordered the parties to meet and confer to resolve the issues.  
4 On September 11, 2025, Mr. Terry produced an unsworn, and woefully incomplete, Financial  
5 Disclosures. *See Exhibit 9.* Ms. Terry did not produce a separate statement as required.

6 Mr. Terry was deposed on September 15, 2025, and eight days *after* his testimony, we  
7 were provided his updated and signed Financial Disclosures on September 23, 2024 (*see Exhibit*  
8 **1-J**, Accounting Review and Summary), while Isis Terry’s Financial Disclosures were not  
9 provided until September 24, 2025 (one month after it was due). *See Exhibit 1-I*, Accounting  
10 Review and Summary. But even then, both forms were incomplete and contained false and  
11 misleading information. Both failed to include the assets of the Auspicious Trust, despite the  
12 fact that the Terrys are the only beneficiaries of the Trust.<sup>9</sup> Both failed to complete the  
13 “Transfers of Assets” section, which required disclosure of transfers greater than \$5,000, instead  
14 responding “Presently Unavailable or Under Review.” *Id.*, Item 23 (Page 8 of the Disclosures).  
15 Mr. Terry claimed in his deposition that he was not aware of this obligation until a few days  
16 before his deposition on September 15, and Ms. Terry stated in her testimony that she had done  
17 “nothing” to gather the information.<sup>10</sup>

18 Ms. Terry’s deposition testimony revealed her intentional disregard for the requirements  
19 of the PI. She stated she had not read the sworn statement under penalty of perjury certification  
20 in her Financial Disclosures even though she signed immediately below it. She indicated she had  
21

22 \_\_\_\_\_  
23 <sup>9</sup> As one glaring example of the falsity of Ms. Terry’s sworn Financial Disclosures (discussed  
24 *infra*), she reported the value of her engagement ring at \$10,000. Based on a review of Ms.  
25 Terry’s documents, we found that she and Mr. Terry had obtained an appraisal for insurance  
purposes on December 26, 2020, for the engagement ring, which was valued at \$2,874,482.00.  
When asked about this in her deposition, she had no explanation for the massive discrepancy  
except to claim she could not recall the details.

26 <sup>10</sup> As discussed more fully below, the transfer information is important. There is evidence that  
27 the Terrys transferred millions of dollars to family and friends. For example, Chris Terry  
28 admitted in his deposition to purchasing the \$3 million home his girlfriend lives in. We also see  
text discussion of a \$50,000 diamond tiara he bought for the same girlfriend and that he arranged  
to pay the exorbitant rent and housing costs of other women.

1 not read the PI and demonstrated a lack of respect, indeed even contempt, for the Court's Order.  
2 *See Exhibit 3* at 35.

3 4. Foreign Asset Disclosures (PI, Section VI)

4 To date, neither the Monitored Entities nor the Individual Defendants have provided the  
5 required disclosures and accounting of any foreign assets as required by Section VI, although  
6 four Dubai entities, which Isis Terry controls as the signatory on their bank accounts were  
7 identified and bank account statements were provided for two of these entities.

8 5. Provision of Information to Monitor (PI, Section XVI)

9 Section XVI(A-H) require Defendants to provide very specific categories of access and  
10 information to the Monitor "immediately, but not less than 72 hours." ECF No. 111 at 21-22.  
11 Defendants have not complied.

12 Defendants have made a partial production of data and documents over two months,  
13 including: (1) a partial production of Mr. Terry's Gmail account; (2) images of two desktops and  
14 one laptop, belonging to the Terrys; (3) documents received from the FTC; and (4) partial  
15 productions of data extracted from Mr. and Ms. Terry's cell phones. *See Exhibit 10* (Holland &  
16 Hart October 1, 2025 Letter). We understand on Friday October 3, 2025 that Defendants sent a  
17 partial production of Microsoft Office 365 emails for select employees identified by the Monitor,  
18 though we have not been able to access any of these materials yet.

19 In addition, Mr. Kelesis, who has worked with the Terrys since 2022 on tax returns and  
20 related tax issues has made thirteen productions, totaling approximately 3,000 pages, and  
21 consisting of: (1) tax returns; (2) organizational documents for various entities; (3) some bank  
22 statements; and (4) the financial disclosures of Mr. and Ms. Terry, which are discussed above.  
23 *See Exhibit 11* (Cook & Kelesis September 25, 2025 Letter).

24 But this partial (and untimely) production is not compliance. Here is a summary of key  
25 infrastructure data that has not been provided:

26 1) *Microsoft Office 365 Outlook Emails for all IML Employees:*

27 As of the filing of this report, we have not been able to access a single email box  
28 for any IML employee, despite noting that we wanted access to these materials  
almost immediately after the PI was entered. Early on, we suggested that email  
boxes could and should be provided on a rolling basis. On September 24, 2025,

1 more than six weeks after the PI was entered when we still had not been provided  
2 any of the employees' emails, we identified 17 specific email boxes (which can  
3 easily be extracted and sent in a day) be prioritized. Nevertheless, these first  
4 email boxes were sent to us last Friday, October 3, 2025, for arrival on the date  
5 our report is due. All IML employee emails, whatever their position or duties,  
6 have been apparently withheld to run a privilege screen. Given IML is closely  
7 held entity run by two people – the Terrys – it is extremely unlikely the vast  
8 majority of IML employees would ever encounter attorneys as part of their duties,  
9 and any risk is further mitigated by an agreed-upon robust clawback process;

10 2) *Isis Terry's IML Gmail Account:*

11 Defense counsel informed us early on that Isis Terry used only an IML email  
12 accounts, while Chris Terry used a Gmail account to conduct all of his business.  
13 As a result, we requested the IML email boxes for Isis Terry be provided on a  
14 priority basis. However, during her deposition on September 30 (seven weeks  
15 after the PI was entered), Ms. Terry revealed that she also has used an IML Gmail  
16 account since 2013 (the year IML began operations). This was a surprise;  
17 particularly because the process of negotiating, identifying, and obtaining the  
18 Individual Defendants' email boxes and texts with defense counsel was protracted  
19 and cumbersome. During her deposition, defense counsel indicated that the  
20 Gmail box was in the process of being imaged by the data vendor. Again, if it  
21 was, that was a new development to us (and we had understood we were being  
22 copied on all communications with the data vendor);

23 3) *Conversations on Isis Terry's Cell Phone:*

24 Defense counsel withheld approximately one-third of the individual messages  
25 (103,351 individual messages contained in 771 conversation files) when it  
26 produced an extraction of Ms. Terry's cell phone data. The reason given was to  
27 conduct a "first-round privilege review." The withheld documents appear to  
28 include *all* communications between Mr. and Ms. Terry, ostensibly under a  
marital privilege. We do not believe there is any legal basis to broadly withhold  
all documents between spouses who are also business partners (and we  
highlighted this long ago to defense counsel), but nevertheless they have been  
withheld without any legal authority or privilege log;

29 4) *Images/Video/Audio Files:*

30 We have also not been provided images/videos/audio files despite the fact that the  
31 Monitor specifically requested them. Defendants' counsel made a unilateral  
32 decision to withhold this data "pending further discussion b/w counsel and  
33 Monitor to determine how to handle given time/cost concerns." The audio and  
34 video files are of significant evidentiary value here, given the Terrys' practice of  
35 sending and receiving videos and images regarding their use of cryptocurrency to  
36 purchase assets and their assets. For instance, in two text messages produced by  
37 realtor Matt Brimhall, Mr. Terry recorded himself scrolling through videos  
38 sharing his cryptocurrency transactions and showing more than \$50 million in  
39 cryptocurrency transfers between October 2020 and February 2022. *See Exhibit*  
40 **12** (screenshots of two videos). Additionally, Ms. Terry's jeweler shared with her  
41 videos of her bespoke engagement ring in December of 2020, which was just  
42 appraised for approximately \$3 million (Ms. Terry claimed it was worth \$10,000  
43 in her Financial Disclosures). *See Exhibit 13* (screenshots of videos of diamond);  
44 and

1           5)       *Conversations on Chris Terry's Mobile Device:*

2           On September 29, 2025, we were shipped an extraction of data from Chris Terry's  
3           mobile device. However, as with Ms. Terry's device, a substantial number -  
4           approximately 40% of all messages (419,288 individual messages, contained in  
5           1,357 chats) – were preliminarily withheld “for 1st round privilege review,” as  
6           were all images/videos/audio files. Based on the late date of this production, the  
7           Monitor's team has been unable to review the information on Mr. Terry's device  
8           in the investigation and the preparation of this report. As noted above, we do not  
9           believe that there is a legal basis to withhold these documents and have not been  
10          given a privilege log or supporting case law.

11          6.       Apparent Efforts by the Terrys to Shield and Hide Assets

12          Not only have Defendants failed to provide financial information required by the PI, the  
13          Terrys have taken many deliberate actions that appear to be only for the purpose of shielding and  
14          hiding assets.

15                *a. IML Crypto Assets Converted to the Terrys*

16          As detailed in the accounting report, **Exhibit 1**, prior to 2021, IML transferred more than  
17          \$36 million in cryptocurrency to crypto wallets controlled by Mr. Terry. These were initially  
18          classified as “Bitpay Transfer to Owners,” and later re-categorized apparently to conceal that  
19          these were untaxed distributions to the Terrys. From 2022 forward, an additional amount of  
20          cryptocurrency in excess of more than \$44 million was similarly transferred to Chris Terry's  
21          cryptocurrency wallets.

22          When asked about the tens of millions in IML cryptocurrency transferred to Chris Terry,  
23          both Terrys provided little explanation for the accounting treatment of these assets, how they  
24          were taxed, if they were taxed, and what they did with the money. While Mr. Terry was more  
25          forthcoming than Ms. Terry, neither was credible. The Terrys confirmed that IML was the only  
26          source of their income. Mr. Terry also confirmed that he controlled IML cryptocurrency, which  
27          was transferred to his personal wallets – and then he determined where the crypto went from  
28          there. Despite being CFO and President, Ms. Terry disclaimed any memory of the  
29          cryptocurrency transactions or any knowledge of their accounting characterizations – including  
30          not recording millions of cryptocurrency sent to IML as revenue prior to 2021, and then  
31          recording the cryptocurrency beginning in 2021 but characterizing numerous transfers to Chris  
32          Terry as business expenses. Neither had any explanation how the Terrys could have transferred

1 more than \$100 million in various ways from IML to themselves, while they claimed to have  
 2 earned less than \$10 million combined in income, according to their own taxes and sworn  
 3 financial statements. Indeed, Chris Terry produced a one-page document, entitled “Employment  
 4 Information for Chris and Isis Terry”, which lists their income as follows:

5  
 6 **Employment Information for Chris and Isis Terry**

7 **Chris**

8 2021 \$645,610.00  
 9 2022 \$541,970.00  
 2023 \$573,247.00

10 **Isis**

11 2021 \$5,924,721.00  
 12 2022 \$540,570.00  
 2023 \$571,747.00

13  
 14  
 15 **Exhibit 9.**

16 Contemporaneous evidence, including Mr. Terry’s personal texts indicates that he  
 17 regularly talked about his expertise in cryptocurrency, the wealth he had gained through it, and  
 18 even how he used it to evade regulators and taxes. In a May 9, 2021 text, Mr. Terry bragged that  
 19 he had made over \$110 million in the past 18 months and was “sitting on \$50 [million after  
 20 taking] 65 [million] out.” **Exhibit 7.** Mr. Terry then extolled how “When u make \$\$ in crypto...  
 21 Only u and God know... Bypass regulations and taxes... But imagine... Making fortunes no  
 22 taxes... keep everything on a device watch... I carry with me... Also keep some on a wallet but  
 23 the ledger acts like a safe... Off grid... None taceablem... Tradecable.” *Id.* [misspelling in  
 24 original text]. Chris Terry’s motivations and maneuvers could not appear clearer: he was using  
 25 cryptocurrency to avoid detection and taxes.

26 We have also discovered that during this same time period, both Terrys were routinely  
 27 using the (apparently untaxed) IML cryptocurrency to pay for personal assets, including: houses  
 28 and condominiums in Florida, New York, and Dubai; more than a dozen automobiles; more than

1 two dozen investment properties; and a yacht. While some of these purchases were funded  
2 through direct and indirect wire transfers from IML, many were made using IML's  
3 cryptocurrency. Examples of this include:

- 4 • In October 2020, the Terrys paid more than \$10 million in United Arab Emirates  
5 Currency (AED) (\$2.9 million USD) as the first payments towards the purchase in  
6 their individual names of an 8,000 square-foot condominium located at One Palm  
7 Jumeirah in Dubai. The purchase price was \$35,600,000 AED (equal to  
8 approximately \$9.6 million dollars). We located a spreadsheet that Ms. Terry sent  
9 to her personal assistant confirming the use of Bitcoin to make cash payments in  
10 Dubai. To convert the Bitcoin to AED, the Terrys engaged a middleman based in  
11 Dubai known as "Bitman," who received a 5% fee (approximately \$150,000 in  
12 US Dollars) for his role in the conversion. *See Exhibit 14.*
- 13 • In March 2021, the Terrys used Bitman again, this time sending him Bitcoin  
14 worth \$884,470 AED plus his 5% fee for the purchase from a Dubai company of  
15 citizenship and passports for the Terrys from the Republic of Vanuatu as part of  
16 the "Vanuatu Citizenship Program." The invoices indicate that Terrys paid in total  
17 more than \$500,000 USD (\$250,000 each) for the citizenship and passports,  
18 which they received in March of 2022. At her deposition, Ms. Terry could not  
19 remember Bitman or why she and her husband spent \$500,000 for Vanuatu  
20 passports.
- 21 • We did find texts documenting that after obtaining these passports, the Terrys re-  
22 named their companies in Dubai, expressly using their Vanuatu passports. *See*  
23 **Exhibit 15**. Ms. Terry offered no testimony to clarify her intentions with these  
24 passports, but the circumstances suggest they furthered a scheme to shield assets.  
25 In a contemporaneous text to the person assisting her with the passports, Ms.  
26 Terry inquired, "Do you think the US knows I have a Vanuatu passport. Because  
27 you used our US passport as ID to do your due diligence for the Vanuatu  
28 application, right? Please let me know for sure about this because it is very

1 important to me.” **Exhibit 16**. If there was a benign reason for getting this  
2 passport, Ms. Terry did not provide it at her deposition. When asked why she had  
3 purchased a Vanuatu passport, Ms. Terry stated that she “d[id] not remember.”  
4 **Exhibit 3** at 210-211. Additionally, she answered “I do not remember” each time  
5 when asked whether she had purchased any other documents for sale by Vanuatu,  
6 including a Vanuatu birth certificate, a Vanuatu driver’s license, a Vanuatu tax ID  
7 card, and a Vanuatu rental agreement with utility bill from Vanuatu to provide  
8 proof of residency.<sup>11</sup> See **Exhibit 3** at 212-218.

- 9 • In April 2021, the Terrys used Bitcoin to fund the deposit for one of their yacht  
10 purchases. On May 6, 2021, Isis Terry emailed the seller of the yacht a summary  
11 of their recent conversation, which indicated:

12 **CHRIS SENT YOU IN BITCOIN \$425,000**

- 13 1) We need the screenshot of how much you **received** from Chris in Bitcoin.
- 14 2) We need screenshot of how much you **withdraw** in Dollars.
- 15 3) We need to proof of the \$380,000.00 for 10% deposit in Escrow.
- 16 4) We need to know the balance you have between the amount you withdraw in  
17 Dollars minus the \$380,000.00.
- 18 5) We need receipts for every expense you paid with the balance between the  
19 amount you withdraw in Dollars minus the \$380,000.00.
- 20 6) If there is any balance left you need to send me an ACH.

21 **Exhibit 17** (emphasis in original).

- 22 • In May 2022, Chris Terry sent a letter to the realtor for the purchaser of one of his  
23 properties agreeing to accept cryptocurrency to close the transaction and  
24 indicating, “All of our current real estate transactions have been completed with  
25 crypto currency. We are very proficient in using crypto currency to exchange  
26 properties around the world.” **Exhibit 18**.

27 <sup>11</sup> Ms. Terry’s claimed inability to remember something as significant as whether the Terrys took  
28 additional steps to hide their identity with birth certificates and other Vanuatu documents is  
troubling, as it leaves open the possibility that they did so.

1                   **b.       *Transfers of Assets to the Auspicious Trust***

2           After IML received the FTC’s Civil Investigative Demand in December 2021, the Terrys  
3 commenced the systematic transfer of tens of millions of dollars in assets to a trust they  
4 controlled, the Auspicious Trust. All assets in this Trust originated from IML – each asset had  
5 been acquired by the Terrys using IML funds and/or IML cryptocurrency.

6           The Terrys are the grantors, the beneficiaries, and through a company in which they are  
7 both members (Afflatus Holdings LLC), the trustees of the Auspicious Trust. *See* generally ECF  
8 No. 113-2. Chris Terry and Isis Terry are also identified as “Trust Protectors” with a right to  
9 remove other trustees. *See id.* at 8. Our review also confirms the Terrys controlled day-to-day  
10 operations of the Trust – we have reviewed numerous examples of the Terrys directing the  
11 transfer of Trust funds.<sup>12</sup>

12           Given that the assets transferred to the Trust derive from IML activity subject to the  
13 Complaint in this matter and the determination the Trust is owned or controlled by the Terrys,  
14 the Auspicious Trust was designated as a Monitored Entity as provided in PI Definitions K (*see*  
15 discussion *supra* regarding process of naming additional Monitored Entities).

16           The Auspicious Trust does have a second trustee – currently P. Sterling Kerr (“Kerr”),  
17 but he can be replaced at any time by the Terrys in their roles as the designated trust  
18 “protectors.” Kerr was originally counsel for Defendants in this lawsuit but withdrew and then  
19 brought a Motion to Intervene on behalf of the Auspicious Trust. *See* ECF No. 113. In that  
20 motion, Kerr asserts that the Trust has property rights apart from the Terrys and that it is  
21 exclusively managed by the Trustees, not the Terrys. Kerr’s allegations blindly ignore the reality  
22 that the Terrys are also trustees through their Afflatus Holdings entity, that they are the Trust  
23 protectors with power to remove Kerr, and that the Terrys have actual operational control of the

24 \_\_\_\_\_  
25 <sup>12</sup> For instance, records we have reviewed provide several examples in 2024 and 2025 where the  
26 Terrys made decisions and took actions for the Trust. For instance, a May 2025 email to Isis  
27 Terry from an IML employee explains that Chris Terry had made the decision to send the Trust’s  
28 funds out of his attorney/co-trustee P. Sterling Kerr’s IOLTA account back to IML to fund its  
operations. *See Exhibit 19*. And in August of this year, Isis Terry signed a letter instructing the  
money from the sale of a Lamborghini be sent to the Trust and deposited in Kerr’s IOLTA  
account. *See Exhibit 20*. Additionally, in the spring and summer of 2025, Trust assets have  
been used to fund Chris Terry’s personal investments.

1 Trust. In other litigation involving the Trust, Kerr has confirmed that the Terrys as beneficiaries  
2 control the Trust and have directed him which actions to take.<sup>13</sup>

3 Kerr has also made unsubstantiated claims as to the Dominant Consulting Group LLC  
4 (“Dominant”), which is owned by the Terrys individually. He presented a sworn declaration to  
5 the FTC and the Monitor, dated September 16, 2025, which identified Dominant as an asset of  
6 the Auspicious Trust.<sup>14</sup> But just months before, when Kerr was shepherding an application for a  
7 loan to be secured by three Dominant properties, he presented to the lender an  
8 Acknowledgement and Statement of Membership Interest of Dominant executed by Chris and  
9 Isis Terry, dated February 13, 2025, which confirmed the Terrys are, and always have been, the  
10 100% owners of Dominant.<sup>15</sup> These representations are diametrically opposed to one another,  
11 and one of them has to be untrue.

12 7. Cooperation and Non-Interference with Monitor (PI, Sections XVII, XVIII)

13 The PI requires Defendants to cooperate fully and assist the Monitor (Section XVII) and  
14 prohibits them from interfering with the Monitor (Section XVIII). As detailed in this report,  
15 Defendants have not complied.

16 Given the overall lack of cooperation from the Defendants, particularly the failure to  
17 provide Financial Disclosures, approximately a month after the PI was entered, the Monitor  
18 utilized the expedited asset discovery provision in the PI (Section XXII(A)) to notice both Mr.

19 \_\_\_\_\_  
20 <sup>13</sup> On September 12, 2025, Kerr filed a lawsuit in Texas on behalf of the Trust in which the  
21 petition alleges: “In the late spring of 2025, *the beneficiaries of the Trust [The Terrys]*  
22 *instructed Trustee [Kerr] to use the funds in the Trust to engage in certain crypto-currency*  
*transactions* through a company called Block Commerce, LLC, owned by Matthew Greene.” **Exhibit 21**, ¶ 18 (emphasis added). It is difficult to understand how Kerr can credibly take  
fundamentally opposed factual positions in two courts at the same time.

23 <sup>14</sup> Kerr claimed, “[Auspicious Trust] currently owns the following assets: Dominant Consulting  
24 Group, LLC, a Nevada limited liability company. I am the Manager of Dominant Consulting  
25 Group, LLC. Dominant Consulting Group, LLC, in turn, owns the following assets.” **Exhibit 1-**  
**K**, Accounting Review and Summary.

26 <sup>15</sup> “Christopher Terry and Isis De La Torre hereby acknowledge that they are jointly, as husband  
27 and wife, the sole members of one hundred percent (100%) of Dominant Consulting Group, LLC  
28 and have been the sole members since the formation of Dominant. They hereby with their  
signatures below, ratify the January 26, 2021 Operating Agreement of Dominant Consulting  
Group, LLC in all respects and their membership Interest as described above.” **Exhibit 22** at  
p. 2. Excerpt from Dominant Consulting Loan Application executed by Kerr.

1 and Ms. Terry’s depositions. These depositions were an effort to secure asset information, which  
2 should have been produced long ago pursuant to the dates in the modified PI. By their  
3 testimony, both Terrys confirmed their lack of cooperation.

4 *a. Deposition of Christopher Terry*

5 Christopher Terry was deposed on September 15, 2025. He was neither credible nor  
6 cooperative, as confirmed by the illustrations below. *See generally Exhibit 2* (Excerpts of  
7 Deposition of Chris Terry).

8 **(i) No Knowledge of His Own Financial Disclosures.**

9 He routinely claimed to have no knowledge of the contents of the Financial Disclosures  
10 presented to us in his name, but unsigned, claiming the content had been provided by his counsel  
11 Sterling Kerr. *See, e.g.*, at 43.

12 **(ii) Ownership of IML is unclear among the owners.**

13 His first Financial Disclosures and his testimony stated that he and Isis Terry are 50/50  
14 owners of IML. This is inconsistent with IML tax returns showing Isis Terry as the 100%  
15 owner. In her deposition, Isis Terry vacillated. While she acknowledged she was listed as the  
16 100% owner in tax filings and the sworn financial statement she had signed and provided under  
17 oath, she also said that she did not know the ownership structure, whether she owned 100%, and  
18 whether Mr. Terry was a 50% owner. *See Exhibit 3* at 187-188.

19 **(iii) Cryptocurrency received by IML was transferred to**  
20 **Christopher Terry’s wallet.**

21 Mr. Terry admitted cryptocurrency received by IML was transferred to wallets he  
22 controlled. *See Exhibit 2* at 46, 165-166. We showed Mr. Terry a July 27, 2022 email to Isis  
23 Terry from an IML finance department employee, which expressly stated, “The Bitpay account  
24 balance was sent to Chris Terry’s wallet each week after payments were made.” **Exhibit 23** at  
25 p. 2. At his deposition, Mr. Terry generally agreed the statement in the July 2022 email was  
26 accurate.

1                                   **(iv) Christopher Terry deployed the crypto as he saw fit.**

2           While Mr. Terry claimed to have paid some IML expenses with these crypto funds, he  
3 admitted spending millions on non-IML expenses, including purchasing 20-plus real estate lots  
4 in a luxury project in Las Vegas and making large payments for a luxury condo (One Palm) in  
5 Dubai and other real estate around the world. *See id.* at 48-49.

6                                   **(v) Christopher Terry spent tens of millions in cryptocurrency.**

7           Although he claimed in text chats to have purchased more than \$120 million in real estate  
8 using cryptocurrency (*see Exhibit 6*), in his deposition, he claimed the number was smaller.  
9 While he could not clearly identify that smaller number (*id.* at 161, 204 & 206-209), he did  
10 confirm the following: he had previously circulated a video of his crypto ledger showing crypto  
11 transactions of more than \$55 million through February of 2022 (*id.* at 206-208); he held more  
12 than \$47 million at one point in a crypto account in February of 2021 (*id.* at 215-16); and he  
13 confirmed he received more than \$26 million in cryptocurrency from IML in 2022 and 2023  
14 alone. *Id.* at 161 & 163-166.

15                                   **(vi) Christopher Terry claims he only has \$2,000 in cryptocurrency**

16           Despite requesting that defense counsel provide the present value of the cryptocurrency  
17 assets for weeks, it was not until Mr. Terry testified that we learned this figure. Terry claimed  
18 *that he now holds a mere \$2 thousand dollars in his crypto wallets.* *See id.* at 151-152.

19           We have serious concerns about this claim in light of the tens upon tens of millions of  
20 dollars of cryptocurrency that IML transferred to Terry's wallets and particularly given the  
21 Individual Defendants' efforts to hide and shield assets. But, at this stage, given Defendants'  
22 delays in providing information and limited access to the cryptocurrency wallets, we cannot yet  
23 provide the Court with further insight.<sup>16</sup>

24 <sup>16</sup> The cryptocurrency wallet process provides another example of the delay and lack of  
25 seriousness with which the Defendants are taking this process. On August 27, two  
26 cryptocurrency wallets, which were represented to be Chris Terry's wallets, were received by our  
27 office. But the PINS Chris Terry provided did not work. After a series of back-and-forths with  
28 counsel in which further instructions from Chris Terry on the PINS were provided, additional  
attempts to access the wallets were made, again without success. In order to avoid being locked  
out of the wallets (only three attempts are permitted before lockout), they were brought to Chris  
Terry's deposition on September 15. Terry was able to open one of the wallets and was locked  
out of the other. He agreed to use his recovery phrases to access the second wallet, which, it was  
agreed, would then be forwarded to us. When 10 days passed without the wallet being provided,

1                                   **(vii) Christopher Terry has not taken his obligations under the PI**  
2                                   **Order seriously.**

3           Beyond routinely denying knowledge about items on his unsigned Financial Disclosures,  
4 it was also clear Christopher Terry had made no effort in the five weeks prior to his deposition to  
5 comply with the PI, which required the Disclosures. When asked whether he had made efforts to  
6 comply with Item 23 of the Disclosures (requiring disclosure of all transfers of more \$5,000 in  
7 assets or currency), he responded “as of yet, no.” **Exhibit 2** at 59. When further questioned why  
8 he had not identified these transfers prior to the deposition (five weeks after the entry of the PI),  
9 he claimed that he had only learned of the obligation in the “last few days” before the deposition.  
10 *Id.* at 59.

11           While Terry promised to “do his best to find” and provide the information required in  
12 Item 23, he submitted signed Financial Disclosures a week after his deposition, responding  
13 “Presently Unavailable or Under Review” to the item. And in the three weeks since the  
14 deposition, he has provided nothing further.

15           These are not the actions of a defendant attempting to comply with the Court’s Order.

16                                   ***b. Deposition of Isis Terry***

17           Isis Terry appeared remotely on September 30, 2025 for deposition. She was not  
18 cooperative or credible and answered “I don’t know” or “I don’t remember” to most questions,  
19 even on very basic topics, as confirmed by the illustrations below. *See generally Exhibit 3*  
20 (Excerpts of Definition of Isis Terry).

21                                   **(i) Isis Terry has not taken her obligations under the PI Order**  
22                                   **seriously.**

23           Ms. Terry indicated that she had not even read the Preliminary Injunction and had taken  
24 few steps to comply with her obligations under it.<sup>17</sup>

25           we inquired of counsel. Four days later, on September 29, they replied, indicating Terry had  
26 opened the wallet. It was finally received by our office on October 1. Given all of the above and  
27 concerns about protecting the data (if any) on the wallets, we are in the process of employing a  
28 vendor to access them.

17           Q.    Ms. Terry, you understand that a federal court, United States District Court for the  
                  District of Nevada entered a preliminary injunction against you, Mr. Terry, IML,  
                  and others on August 11th of this year.

1 (ii) **Isis Terry has done next to nothing to prepare accurate**  
2 **Financial Disclosures.**

3 Ms. Terry indicated in her testimony that despite submitting her personal Financial  
4 Disclosures a week earlier, she had done little to prepare them accurately. She claimed to have  
5 signed them without reading the language certifying that she was doing so under penalty of  
6 perjury just above her signature. Asked about Item 23 requiring a list of transfers over \$5,000,  
7 she admitted she had done “nothing” to comply with that Item in the seven weeks the entry of the  
8 PI. See **Exhibit 3** at 153.

9 Again, this information is significant, given the evidence that Terrys transferred millions  
10 of dollars in Monitored Entity Assets to third parties, including to Ms. Terry’s brother, niece,  
11 brothers-in-law, and sister-in-law. Notwithstanding this, as was the case with her husband, her  
12 Financial Disclosures simply stated, “Presently Unavailable or Under Review.” When asked  
13 what efforts she had taken to secure the information, she responded, “There has been no time for  
14 that, sir.”

15 Q. So your testimony is you haven’t had time to look for these transfers?

16 A. That is correct.

17 Q. You haven’t made any efforts in that regard?

18 A. No, sir. No time.

19 Q. What are you doing that prevents you from complying with the court order?

20 A. I’m doing what I’m advised to do by my team of attorneys.

21 Q. I’m not asking you for what you’re advised. I’m asking you what you do on a  
daily basis...

22 MS. TERRY’S COUNSEL:... Without disclosing attorney/client communications, can  
you address his questions about what you do with regard to this task?

23 A. WITNESS: Nothing.<sup>18</sup>

24 *Id.* at 152-153.

25 A. I was told that, yes.

26 Q. Have you reviewed the preliminary injunction that’s been entered against you by  
the United States District Court?

27 A. No.

28 Q. You haven’t taken the time to look at that document?

A. No.

**Exhibit 3** at 35.

<sup>18</sup> As noted above, contemporaneous records of IML and the Terrys indicate that both Terrys and IML made dozens, if not hundreds, of transfers totaling millions of dollars, which were directed to third parties.



1 (iv) **Isis Terry’s claims of ignorance on multiple topics were not**  
2 **credible.**

3 At her deposition, Ms. Terry implausibly lacked knowledge regarding a \$3 million  
4 appraisal value of her engagement ring. *See generally id.* at 127-130 & 257-261. In her  
5 September 23, 2025 Financial Disclosures, she had stated the ring was currently valued at  
6 \$10,000. *See* Item 17 (Other Personal Property), **Exhibit 1-I**, Accounting Review and Summary.

7 When shown the payment of a \$40,000 annual premium to insure the ring at the \$3  
8 million value, she had no memory. *See id.* at 258. She “didn’t remember” how big her ring was,  
9 how much she’d paid for it, and whether she had estimated a \$3 million value on an insurance  
10 application. *See id.* at 127-128. She even claimed she didn’t have insurance. *See id.* at 130.

11 When asked whether that March 8, 2021 insurance application was near the date of her marriage,  
12 she testified: “I don’t remember.”<sup>21</sup> *Id.* at 259. Ms. Terry was shown the actual December 2020  
13 appraisal describing an engagement ring that was “the property of Isis De La Torre and  
14 Christopher Terry.” *See Exhibit 24*. When asked whether that was her engagement ring, Ms.  
15 Terry responded: “I don’t recall this. I don’t recall the details. I don’t remember.” *See Exhibit*  
16 **3** at 260.

17 She also implausibly stood by her financial statement representations that her only  
18 personal property besides wedding and engagement rings were household furnishings worth a  
19 combined \$75,000 and that she had no artwork in any of her five dwellings (New York house  
20 and four condominiums in Florida and Dubai). *See id.* at 120-121. These claims are incredible.  
21 Ms. Terry completed a Personal Financial Statement in 2021 in which she claimed “Other Assets  
22 (Art, Aircraft, Yacht, Etc.) in the amount of \$14,000,000. *See Exhibit 25*.

23 Our review of emails and texts also reveals the Terrys spent hundreds of thousands of  
24 dollars to redecorate *their New York house alone*. In October 2023, the decorator sent the Terrys  
25 an estimate for \$3 million to remodel 10 rooms. *See Exhibit 26*. (The decorator’s Final Scope  
26 of Work sent to the Terrys indicated that: their new tables and chairs would cost over \$200,000;  
27

---

28 <sup>21</sup> Chris and Isis Terry were married on March 21, 2021.

1 three new sofas more than \$75,000; and four new rugs approximately \$100,000). *See id.*<sup>22</sup> It  
2 appears that at least some of the proposed remodeling was done, though we have not yet found  
3 whether all of it was done or how exactly it was paid for.

4 Ms. Terry also lacked candor regarding the Auspicious Trust to which she and Mr. Terry  
5 had transferred millions. She claimed not to know what the Auspicious Trust is or whether she  
6 was a beneficiary or trustee, and she had no memory of transferring to the Trust a Terra Firma  
7 entity less than a year ago. *See generally* **Exhibit 3** at 227-230. Several documents within Ms.  
8 Terry's own records show not only her knowledge about the Trust's existence but also her  
9 continued active oversight of the Trust and its assets throughout 2025, including asking for the  
10 specific purpose for transfers of Trust funds. *See e.g.*, **Exhibit 14**.

11 She also claimed not to remember cryptocurrency funding numerous purchases by and  
12 for her. Despite being shown her own texts showing cryptocurrency used for private jets, hotel  
13 rooms, security, and even millions in payments for her Dubai condominium, she continued to  
14 claim she could not remember cryptocurrency being used for her benefit. *See* **Exhibit 27**; *see*  
15 *also* **Exhibit 19**.

16 She claimed no memory as to why she had signature authority on four bank accounts for  
17 entities based in Dubai (Rainmaker Investments, RealInvest, Big Agency EAU Marketing, and  
18 Shauna). She said she "wanted to business with them," but could not answer what the businesses  
19 did or who the owners were. And she claimed no knowledge of the source of the millions of  
20 dollars of funds flowing through these accounts or where the funds went. *See generally id.* at 76-  
21 82.

22 Ms. Terry's conduct, and most especially her deposition testimony, were not the actions  
23 of someone attempting to comply with the Court's Order. In sum, the testimony of both Terrys

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24  
25 <sup>22</sup> For his part, Chris Terry listed a total of \$1,350 in personal property (a wedding ring and  
26 necklace). But this claim, like Isis Terry's, is preposterous. The Terrys are prolific purchasers of  
27 luxury goods, *e.g.*, Hermes, Gucci, Versace, etc. While we have not yet had an opportunity to do  
28 the detailed review necessary to determine how much they spent on luxury goods, it is likely in  
the hundreds of thousands or perhaps millions – all of which was paid for with IML proceeds. In  
August, when Chris Terry opened an IML location up for a member of the Monitor's team, he  
had one designer backpack with him, which almost certainly on its own cost more than the  
\$1,350 he had declared.

1 was not credible, and when combined with their conduct, it creates an almost insurmountable  
2 doubt that they can be relied on to identify, protect, and not dissipate assets during the course of  
3 the litigation.

4 V.

5 **FINANCIAL REVIEW AND ACCOUNTING**

6 The Monitor's accounting team has reviewed the available financial records of the  
7 Monitor Entities, 2013-2025. A summary of that review, which remains preliminary, is  
8 **Exhibit 1**. Additionally, that review includes a description of the Monitored Entities' corporate  
9 structures and further details of the organizational structure, as ordered by the Court in Section  
10 XV(C) of the PI.

11 The primary observations of the accounting team's Summary are as follows:

- 12 • For the period 2013 - YTD 2025, revenues of the investment training business  
13 were \$1.3 billion with net booked income of \$48 million;
- 14 • Profit and Loss Statements for the years 2017 through August 2025 indicate that  
15 the highest revenue years were from 2018 through 2023, all exceeding \$100  
16 million annually with 2021 the highest at over \$396 million. Non-operating  
17 expenses in each year were highly variable and questionable. These expenses  
18 were difficult to analyze due to inconsistent use of accounts and expense  
19 classifications;
- 20 • The Balance Sheet at August 31, 2025, as adjusted, reflects minimal assets and  
21 significant liabilities. Specifically, \$56,000 of cash, approximately \$4 million in  
22 purchase price of a yacht, \$5.9 million of a loan due from Isis Terry for funds  
23 advanced on New York, Dubai, and personal advances through 2020, and  
24 unaccounted cryptocurrency deposits of over \$58 million;
- 25 • Individual Defendants Chris Terry and Isis Terry used IML bank accounts as the  
26 primary funding source for their personal expenses and their non-IML business  
27 expenses. Substantial personal expenses were also written off by IML as business  
28 expenses and not reported as income to the Individual Defendants. We have also  
identified real property assets acquired by the Terrys and their entities with a  
reported value in excess of \$80 million that was most likely sourced from IML-  
derived funds; and
- Significant sales were denominated in cryptocurrency but were not recorded at all  
prior to 2021. From 2021 forward, cryptocurrency deposits, totaling an estimated  
\$85 million, were made to wallets controlled by Chris Terry, but never delivered  
to IML, instead recorded as unreconciled assets or miscellaneous non-operating  
expenses in the IML Books.

Further details are reported in **Exhibit 1**.

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VI.

**DETERMINATION OF WHETHER THE MONITORED ENTITIES CAN BE  
CONTINUED LEGALLY AND PROFITABLY**

The Court also ordered the Court to provide a determination of whether the Monitored Entities can be continued legally and profitably. *See* Section XV(D) of the PI. As for IML, the issue is moot as the Terrys shut down the business in May of 2025. There has been no indication that any of the Defendants seek to market the Products at issue in the Complaint or otherwise revive the related businesses. Thus, the ongoing activities of the Monitored Entities relate to legal and potentially profitable businesses (largely real estate investments), but given all the above, there is significant doubt the Terrys can be trusted to protect the assets of the Monitored Entities.

Dated: October 6, 2025

By:   
Thomas W. McNamara  
Monitor

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