

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 20-CV-81205-RAR**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS  
GROUP, INC. d/b/a PAR FUNDING, *et al.*,

Defendants.

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**RECEIVER RYAN K. STUMPHAUZER'S NOTICE REGARDING THE ABFP  
MULTI-STRATEGY ENTITIES AND PAYMENT OF INSURANCE PREMIUMS  
PURSUANT TO ORDER GRANTING IN PART DEFENDANT DEAN J. VAGNOZZI'S  
EXPEDITED MOTION TO APPROVE PAYMENT OF INSURANCE PREMIUMS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,<sup>1</sup> by and through undersigned counsel and pursuant to this Court’s Order Granting in Part Defendant Dean J. Vagnozzi’s Expedited Motion to Approve Payment of Insurance Premiums entered on September 1, 2020 (ECF No. 219), hereby files this notice regarding the ABFP Multi-Strategy Investment Fund LP and ABFP Multi-Strategy Fund 2 LP (the “Multi-Strategy Entities”) and the payment of premiums for insurance policies owned by the Multi-Strategy Entities.

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<sup>1</sup> The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding; Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel.

As directed by the Court, Mr. Vagnozzi and the Receiver have discussed the status of the Multi-Strategy Entities. The Multi-Strategy Entities contain investments in promissory notes from Par Funding, as well as life insurance policies. The Receiver and Mr. Vagnozzi agree that the Multi-Strategy Entities should be included as Receivership Entities, with separate bank accounts maintained for each of the Multi-Strategy Entities. The Receiver and Mr. Vagnozzi have agreed that the Receiver will file an expedited Motion with the Court seeking the Court's approval to include the Multi-Strategy Entities within the Receivership Estate. Mr. Vagnozzi has agreed to cooperate with the Receiver in determining which life insurance policies owned by the Multi-Strategy Entities require payment of premiums, the due dates, and the amounts.

Mr. Vagnozzi has advised the Receiver that, although payments of premiums for policies owned by the Multi-Strategy Entities will be coming due soon, none of the policies are at immediate risk of default for non-payment. Mr. Vagnozzi has agreed to cooperate with the Receiver and provide the necessary information so that the parties may bring these issues before the Court for resolution sufficiently in advance of any deadlines related to the payment of these premiums. Assuming the Court agrees to include the Multi-Strategy Entities as Receivership Entities, the Receiver will then provide his recommendation to the Court about whether payment of the premiums on life insurance policies owned by the Multi-Strategy Entities should be made.

In his status report dated August 31, 2020 (ECF No. 215), the Receiver noted that certain investors in the Par-Funding related ABFP entities were paid settlements from MK Corporate Debt Investment Company ("MK") and that MK had received money from Par Funding to pay these settlements. Mr. Vagnozzi disclosed the existence of MK to the Receiver on August 7, 2020, and indicated that MK "held funds provided by Par Funding for settlement of disputed claims." Mr. Vagnozzi has agreed that MK should become part of the Receivership Estate. He also has agreed

to transfer all remaining money MK received from Par Funding, which is now being held in a personal account belonging to Mr. Vagnozzi, to the Receivership Estate. The Receiver intends to incorporate these MK related agreements into his anticipated motion to expand the receivership to include the Multi-Strategy Entities and MK as additional Receivership Entities.

Dated: September 2, 2020

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 2, 2020, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya  
TIMOTHY A. KOLAYA