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.
_____/

RECEIVER RYAN K. STUMPHAUZER'S RESPONSE TO PLAINTIFF SECURITIES AND EXCHNAGE COMMISSION'S MOTION FOR FULL SWORN ACCOUNTING FROMD EFENDANT DEAN VAGNOZZI

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver ("Receiver") of the Receivership Entities,[1] by and through his undersigned counsel and pursuant the Court's Order dated September 2, 2020 (ECF No. 229), hereby responds to Plaintiff Securities and Exchange Commission's ("SEC") Motion for Full Sworn Accounting from Defendant Dean Vagnozzi (the "Motion") (ECF No. 227), and states:

[1] The "Receivership Entities" are Complete Business Solutions Group, Inc. d/b/a Par Funding ("Par Funding"); Full Spectrum Processing, Inc. ("Full Spectrum"); 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.

The Receiver believes that the full sworn accounting the SEC seeks from Mr. Vagnozzi would be helpful in light of the issues the SEC has identified in the Motion. Accordingly, the Receiver agrees with the relief the SEC has requested in the Motion and joins in its request for the Court to direct Mr. Vagnozzi to make a full sworn accounting.

Dated: September 4, 2020

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 4, 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