

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 20-CIV-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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**ORDER GRANTING THE RECEIVER’S EXPEDITED MOTION TO EXPAND SCOPE  
OF RECEIVERSHIP TO INCLUDE ADDITIONAL RECEIVERSHIP  
ENTITIES AND TO REQUIRE DEAN VAGNOZZI TO RETURN FUNDS**

**THIS CAUSE** comes before the Court upon the Receiver’s Expedited Motion to Expand Scope of Receivership to Include Additional Receivership Entities and to Require Dean Vagnozzi to Return Funds [ECF No. 236] (“Motion”), filed on September 4, 2020. In the Motion, the Receiver seeks to modify the Court’s Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] (“Receivership Order”) to include ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC (“MK”) as Receivership Entities.<sup>1</sup> The Receiver also seeks an Order requiring Defendant Dean Vagnozzi to return to MK funds in the amount of \$565,000.00 that are currently being held in a personal

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<sup>1</sup> The current “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding (“Par Funding”); Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan (“ABFP”); 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.

account that Dean Vagnozzi jointly owns with his wife. Mr. Vagnozzi does not oppose the relief the Receiver has requested in this Motion.

The Court finds that the Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

**ORDERED AND ADJUDGED** that the Receiver's Expedited Motion to Expand Scope of Receivership to Include Additional Receivership Entities and to Require Dean Vagnozzi to Return Funds [ECF No. 236] is **GRANTED** as follows:

1. The scope of the receivership created in this case is expanded to include ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC. These entities are now specifically included within the list of "Receivership Entities," as provided for in the Court's previous Orders appointing Ryan K. Stumphauzer as the Receiver in this case [ECF Nos. 36, 56, 141]. The Court finds that based on the Securities and Exchange Commission's previous filings and the information the Receiver has supplied in the Motion, the same findings and conclusions that led the Court to include the other ABFP Entities<sup>2</sup> as Receivership Entities apply equally to ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC.

2. Ryan K. Stumphauzer is appointed as Receiver of ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC, and all the "Receivership Assets" of those entities, as that term is defined in the Receivership Order [ECF No. 141]. The Receivership Order shall apply with equal force and effect to ABFP Multi-

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<sup>2</sup> The other ABFP Entities include ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan ("ABFP"); ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; 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.

Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC as it applies to the other Receivership Entities. The terms and provisions of the operative Receivership Order are incorporated by reference herein.

3. Defendant Dean Vagnozzi shall transfer to the Receiver funds in the amount of \$565,000.00, which represent the amount Mr. Vagnozzi transferred on or about July 28, 2020, from the account of MK Corporate Debt Investment Company LLC to a personal account owned jointly by Mr. Vagnozzi and his wife. Specifically, within four (4) business days from the date of this Order, Mr. Vagnozzi shall either:


a. transfer the aforementioned funds to a bank account designated by the Receiver, provided Mr. Vagnozzi has sufficient funds to make this transfer that are not frozen; or

b. provide a copy of this Order to a financial institution at which Mr. Vagnozzi has sufficient funds to make this transfer, provided the funds necessary to make this transfer are frozen, together with written instructions for the financial institution to deliver the funds to the Receiver. Any financial institution receiving a copy of this Order that has funds that are frozen in an account belonging to Mr. Vagnozzi (either individually or as a co-owner) shall unfreeze amounts sufficient to satisfy the transfer provided for in this Order, and shall deliver those funds, either through wire transfer to an account designated by the Receiver, or by mailing a cashier's check made payable to MK Corporate Debt Investment Company LLC, Ryan K. Stumphauzer, Receiver, and delivering the check to: Ryan K. Stumphauzer, Receiver, c/o Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, Two South Biscayne Boulevard, Suite 1600, Miami, Florida 33131.

4. Upon the transfer of the funds as required hereunder, the funds will become an asset of the Receivership Estate, for which the Receiver will have all powers and rights granted to

him under the Receivership Order, and Mr. Vagnozzi will be deemed to have waived and relinquished the right to assert any personal claim to these funds.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 4th day of September, 2020.



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**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

Copies to: Counsel of record