

**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 AND DEAN VAGNOZZI’S JOINT
STATUS REPORT DATED OCTOBER 21, 2020, REGARDING SEPARATION OF
ABFP-RELATED ENTITIES THAT HAD NO INVOLVEMENT IN PAR FUNDING**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ and Defendant Dean Vagnozzi (“Vagnozzi”), by and through their respective undersigned counsel, and pursuant to this Court’s Order dated October 16, 2020 [ECF No. 332], hereby file this Status Report dated October 21, 2020, regarding their efforts to reach an agreement on the separation from the Receivership of various ABFP-related entities that had no involvement in Par Funding, and state:

¹ The “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; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC.

Counsel for the Receiver and counsel for Vagnozzi have reached agreement on terms for the proposed separation of the Non-Par Entities² from the Receivership. Mr. Vagnozzi and the Securities and Exchange Commission continue to discuss certain additional details related to the anticipated Joint Motion, and the parties hope to be in a position to advise the Court on the status of finalizing and filing this Joint Motion by the end of this week (*i.e.*, on or before October 23, 2020).

Dated: October 21, 2020

Respectfully Submitted,

<p>AKERMAN LLP Three Brickell City Centre, Suite 1100 98 Southeast Seventh Street Miami, Florida 33131 Telephone: (305) 374-5600 Facsimile: (305) 374-5095</p> <p>By: <u>/s/ Brian P. Miller</u> BRIAN P. MILLER Florida Bar No. 980633 brian.miller@akerman.com Kelly.connolly@akerman.com ALEJANDRO J. PAZ Florida Bar No. 1011728 Alejandro.paz@akerman.com marylin.herrera@akerman.com</p> <p><i>Attorneys for Dean Vagnozzi</i></p>	<p>STUMPHAUZER FOSLID SLOMAN ROSS & KOLAYA, PLLC Two South Biscayne Blvd., Suite 1600 Miami, FL 33131 Telephone: (305) 614-1400 Facsimile: (305) 614-1425</p> <p>By: <u>/s/ Timothy A. Kolaya</u> TIMOTHY A. KOLAYA Florida Bar No. 056140 tkolaya@sflaw.com</p> <p><i>Co-Counsel for Receiver</i></p>
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² The Non-Par Entities include Pillar Life Settlement Fund I LP, Pillar II Life Settlement Fund LP, Pillar 3 Life Settlement Fund LP, Pillar 4 Life Settlement Fund LP, Pillar 5 Life Settlement Fund LP, Pillar 6 Life Settlement Fund LP, Pillar 7 Life Settlement Fund LP, Pillar 8 Life Settlement Fund LP, Atrium Legal Capital LLC, Atrium Legal Capital 2 LLC, Atrium Legal Capital 3 LLC, Atrium Legal Capital 4 LLC, ProMed Investment Co. LP, ProMed Investment GP LLC, Woodland Falls Investment Fund LLC, Gibraltar Fund LP, Windsor Corporate Park Investment Fund LLC, and ABFP Libra Fund LLC.

	<p>PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP 1818 Market Street, Suite 3402 Philadelphia, PA 19103 Telephone: (215) 320-6200 Facsimile: (215) 981-0082</p> <p>By: <u>/s/ Gaetan J. Alfano</u> GAETAN J. ALFANO Pennsylvania Bar No. 32971 (Admitted Pro Hac Vice) GJA@Pietragallo.com DOUGLAS K. ROSENBLUM Pennsylvania Bar No. 90989 (Admitted Pro Hac Vice) DKR@Pietragallo.com</p> <p><i>Co-Counsel for Receiver</i></p>
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 21, 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