

**UNITED STATES DISTRICT COURT
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'S NOTICE OF COMPLIANCE REGARDING PILLAR 8 LIFE
SETTLEMENT FUND LP PURSUANT TO PARAGRAPH 4 OF [ECF NO. 360]
THE COURT'S OCTOBER 31, 2020, ORDER GRANTING DEFENDANT
DEAN VAGNOZZI'S UNOPPOSED MOTION TO RELEASE CERTAIN
VAGNOZZI-CONTROLLED ENTITIES FROM THE RECEIVERSHIP**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver ("Receiver") of the Receivership Entities,¹ by and through undersigned counsel, hereby files this Notice of Compliance with Regard

¹ 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; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment Fund 2 LP; MK Corporate Debt Investment Company LLC; Capital Source 2000, Inc.; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consultants, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; Liberty Eighth Avenue LLC; The LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; and 500 Fairmount Avenue, LLC and the Receivership Estate also includes the

to Pillar 8 Life Settlement Fund LP Pursuant to Paragraph 4 of this Court's October 31, 2020, Order Granting Defendant Dean Vagnozzi's Unopposed Motion to Release Certain Vagnozzi-Controlled Entities from the Receivership (the "Order") [ECF No. 360].

1. Defendant Dean Vagnozzi has agreed to pay the Receiver the sum of \$8,500.00 (the "Payment") in exchange for the Receiver transferring the general partnership interest in Pillar 8 Life Settlement Fund LP ("Pillar 8") that ABFP Management Company, LLC ("ABFP Management") owns, which the Receiver now controls by virtue of the inclusion of ABFP Management as one of the Receivership Entities.

2. The Receiver's general partnership interest in Pillar 8 represents 0.1% of the total interests in the investment fund.

3. The Receiver agreed to accept that Payment at the request of InvestServ LLC, the company Defendant Dean Vagnozzi has chosen to manage Pillar 8, and based upon the following representations from InvestServ:

- a. Pillar 8 is in "desperate need of premium dollars;"
- b. "Selling any part of the life settlement funds will be next to impossible;"
- c. InvestServ has identified a third-party company that is willing to finance 12 of the 15 policies owned by Pillar 8 (the "Financing Transaction");
- d. InvestServ likely will let the other three (3) policies lapse;
- e. The proposed third-party company is reluctant to proceed with the Financing Transaction until Pillar 8's obligations to the Receiver have been satisfied;
- f. If the 12 policies subject to the Financing Transaction were to be fully redeemed

properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; and 107 Quayside Dr., Jupiter FL 33477.

at face value immediately, the Receiver's General Partnership Interest in Pillar 8 would be valued at \$10,825.00; and

g. It is likely that these policies will not be redeemed for another three (3) to seven (7) years.

4. The Receiver has reviewed with his consultant, DSI, the representations and information provided by InvestServ with respect to Pillar 8. The Receiver has determined, in his professional judgment, that the Payment in the amount of \$8,500.00 represents the present fair value of the Receiver's general partnership interest in Pillar 8.

5. As such, upon the Receiver's receipt of the Payment, all provisions of the Court's Order will be satisfied as to Pillar 8 and, as such, Pillar 8 shall no longer have any association or involvement with, or coordination or reporting obligations to, the Receiver and the Receivership Estate.

Dated: March 18, 2021

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 18, 2021, 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