

**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.**

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**RECEIVER'S NOTICE OF COMPLIANCE REGARDING PILLAR 1-5 AND  
PILLAR 7 LIFE SETTLEMENT FUND LP PURSUANT TO PARAGRAPH 4  
OF 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,<sup>1</sup> by and through undersigned counsel, hereby files this Notice of Compliance with Regard

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<sup>1</sup> 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; 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

to Pillar 1-5 and Pillar 7 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 paid the Receiver the sum of \$3,281.00 (the "Pillar 1 Payment") in exchange for the Receiver transferring the general partnership interest in Pillar 1 Life Settlement Fund LP ("Pillar 1") 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. Dean Vagnozzi has paid the Receiver the sum of \$2,391.00 (the "Pillar 2 Payment") in exchange for the Receiver transferring the general partnership interest in Pillar 2 Life Settlement Fund LP ("Pillar 2") 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.

3. Dean Vagnozzi has paid the Receiver the sum of \$2,163.00 (the "Pillar 3 Payment") in exchange for the Receiver transferring the general partnership interest in Pillar 3 Life Settlement Fund LP ("Pillar 3") 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.

4. Dean Vagnozzi has paid the Receiver the sum of \$1,634.00 (the "Pillar 4 Payment") in exchange for the Receiver transferring the general partnership interest in Pillar 4 Life Settlement

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Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; and LM Property Management LLC; and the Receivership also includes the properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr., Jupiter FL 33477; 2413 Roma Drive, Philadelphia, PA 19145.

Fund LP (“Pillar 4”) 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.

5. Defendant Dean Vagnozzi has paid the Receiver the sum of \$1,833.00 (the “Pillar 5 Payment”) in exchange for the Receiver transferring the general partnership interest in Pillar 5 Life Settlement Fund LP (“Pillar 5”) 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.

6. Defendant Dean Vagnozzi has paid the Receiver the sum of \$4,517.00 (the “Pillar 7 Payment”) in exchange for the Receiver transferring the general partnership interest in Pillar 7 Life Settlement Fund LP (“Pillar 7”) 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.

7. The Receiver’s general partnership interests in Pillar 1-5 and Pillar 7 each represent 0.1% of the total interests in the investment funds.

8. The Receiver agreed to accept the Payments in Paragraphs 1-6 above.

9. The Receiver has reviewed these transactions with his consultant, DSI, and has determined, in his professional judgment, that the Payments in Paragraphs 1-6 above represent the present fair value of the Receiver’s general partnership interest in Pillar 1-5 and Pillar 7.

10. All provisions of the Court’s Order will be satisfied as to Pillar 1-5 and Pillar 7 and, as such, Pillar 1-5 and Pillar 7 shall no longer have any association or involvement with, or coordination or reporting obligations to, the Receiver and the Receivership Estate.

Dated: November 29, 2021

Respectfully Submitted,

**STUMPHAUZER FOSLID SLOMANROSS &  
KOLAYA, PLLC**

Two South Biscayne Blvd., Suite 1600  
Miami, FL 33131  
Telephone: (305) 614-1400

By: /s/ Timothy A. Kolaya  
TIMOTHY A. KOLAYA  
Florida Bar No. 056140  
*tkolaya@sfslaw.com*

*Co-Counsel for Receiver*

**PIETRAGALLO GORDON ALFANO BOSICK  
& RASPANTI, LLP**

1818 Market Street, Suite 3402  
Philadelphia, PA 19103  
Telephone: (215) 320-6200

By: /s/ Gaetan J. Alfano  
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*

*Co-Counsel for Receiver*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 29, 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