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 6 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

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

to Pillar 6 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 \$4,926.00 (the "Payment") in exchange for the Receiver transferring the general partnership interest in Pillar 6 Life Settlement Fund LP ("Pillar 6") 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 6 represents 0.1% of the total interests in the investment fund.

3. The Receiver agreed to accept that Payment.

4. The Receiver has reviewed this transaction with his consultant, DSI, and has determined, in his professional judgment, that the Payment in the amount of \$4,926 represents the present fair value of the Receiver's general partnership interest in Pillar 6.

5. All provisions of the Court's Order will be satisfied as to Pillar 6 and, as such, Pillar 6 shall no longer have any association or involvement with, or coordination or reporting obligations to, the Receiver and the Receivership Estate.

LME 2017 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.

Dated: November 2, 2021

Respectfully Submitted,

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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

Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 2, 2021, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document isbeing served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

<u>/s/ Timothy A. Kolaya</u> TIMOTHY A. KOLAYA