

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,

**JOINT NOTICE REGARDING DISTRIBUTION
AND REQUEST FOR AN ADDITIONAL 10 DAYS TO
COMPLETE CONFERRAL REGARDING THE CLAIMS CALCULATION**

Pursuant to the Court's Order [ECF No. 1822], Plaintiff Securities and Exchange Commission and the Receiver, Ryan Stumphauzer, hereby file a Joint Notice to update the Court about distributions and the claims calculation.

Distributions: The Receiver previously retained Epiq to handle the distributions of funds to investors pursuant to this Court's Order. As reflected in the Receiver's billing records and invoices filed in this case, Epiq has conducted significant work related to the distribution. Once the claims are determined by the Court and a distribution plan is approved by the Court, Epiq is prepared to transmit funds to investors who would receive distributions according to the instructions in the Court Order. Accordingly, Epiq should remain the entity that sends the distribution.

Appropriate Claim Calculation Formula: Counsel for the Commission and Receiver had productive discussions on March 5 and 7, 2024. The Commission and Receiver will continue discussions during the week of March 11, 2024 in an effort to reach an agreement on how claims should be calculated. The Commission and Receiver believe that an additional ten (10) days, until March 21, 2024, is needed to complete the conferral process. Accordingly, the Commission and Receiver respectfully request until March 21 to file a second joint status report regarding the investor claims calculation in this case.

March 11, 2024

Respectfully submitted,

s/Amie Riggle Berlin

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