

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 9:20-CV-81205-RAR

-CV- Rodolfo A Ruiz II - US District Judge

Claim No. 20174

Jean P. Rospondek

Stanley J Rospondek

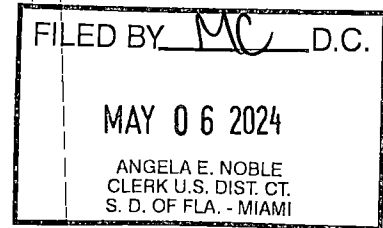
Plaintiff(s)

vs.

Complete Business Solutions Group

d/b/a/ Par Funding et.al

Defendant(s)



**MOTION FOR RELIEF**

I, Jean P. Rospondek and Stanley J. Rospondek (Plaintiffs) are filing a motion for relief sought based on the rejection of our claim to recover money invested in Par Funding, originally known as Pisces Income Fund LLC (Exhibit A).

1. This investment was made in good faith after hearing radio ads for several years on local KYW radio, a well respected news station in the Tri-state area. After hearing the ads for so long we believed they were legitimate or the station would not have continued to use them.
2. After attending a meeting in Moorestown, NJ to obtain more information, we decided to invest \$50,000.00 with the promise that the initial investment would be returned at the end of one year (12/25/2020). During that year we would receive monthly interest totaling ten percent.  
(Exhibit B – Check #103 for \$50,000.00 written on Bank of America 12/11/2019.)  
(Exhibit C – Signature page dated 12/17/2019.)
3. Interest payments received 1/29/2020 and 3/2/2020 in the amount of \$416.67 on both dates to our PNC bank account.
4. Fund was reorganized to become Pisces Income Fund Parallel LLC with the promise of four percent interest as Par Funding borrowers went into default. (Exhibit D – signature pages attached).

# EXHIBIT A

Case 9:20-cv-81205-RAR Document 1843-15 Entered on FLSD Docket 04/22/2024 Page 3 of  
 Objections - Investors in Agent Funds

Confirmation Number / Claim Number	Who is the current creditor?	Asserted Claim Amount	Allowed Claim Amount
20618	Redacted	201,000.00	-
20051	Redacted	250,000.00	-
20117	Redacted	250,000.00	-
20417	Redacted	250,000.00	-
352	Redacted	103,693.34	-
20541	Redacted	128,374.89	-
497	Redacted	140,000.00	-
20069	Redacted	251,000.00	-
57	Redacted	101,000.00	-
281	Redacted	125,000.00	-
20096	Redacted	251,000.00	-
20218	Redacted	50,000.00	-
20075	Redacted	50,000.00	-
20059	Redacted	75,000.00	-
20174	Redacted	55,000.00	-
20039	Redacted	60,000.00	-
20407	Redacted	302,000.00	-
532	Redacted	75,000.00	-
35	Redacted	51,000.00	-
20242	Redacted	440,000.00	-
20022	Redacted	410,000.00	-
20023	Redacted	144,500.00	-
20024	Redacted	88,000.00	-
20583	Redacted	98,916.67	-
11	Redacted	164,500.00	-
20302	Redacted	110,000.00	-
20661	Redacted	177,400.00	-
22	Redacted	70,000.00	-
23	Redacted	50,000.00	-
20171	Redacted	201,000.00	-

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←

# EXHIBIT B

JEAN P ROSPONDEK  
STANLEY J ROSPONDEK  
1207 PARRY AVE  
CINNAMINSON NJ 08077-2244

103

December 11, 2019  
Date

60-208/312 PA  
1057

Pay To The  
Order Of

Pisces Income Fund, LLC

\$ 50,000.<sup>00</sup>/<sub>100</sub>

Fifty thousand

00/<sub>100</sub> Dollars



**Bank of America**

ACH R/T 031202084

For 1yr invest.

Jean Rospondek RP

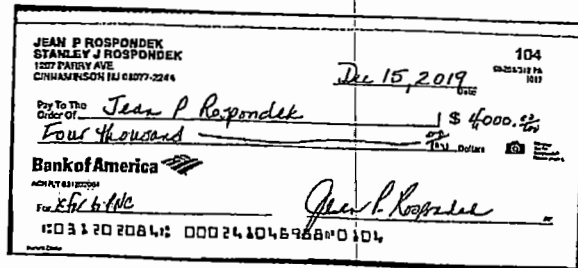
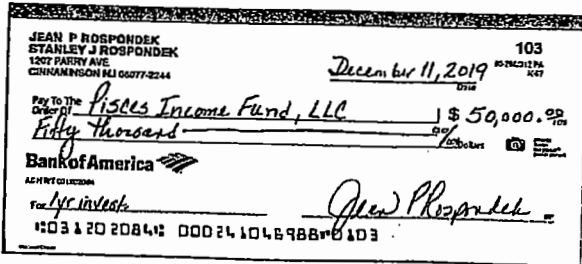
**BANK OF AMERICA**

JEAN ROSPONDEK | Account # 0002 4104 6988 | November 21, 2019 to December 20, 2019

## Check images

Account number: 0002 4104 6988  
Check number: 103 | Amount: \$50,000.00

Check number: 104 | Amount: \$4,000.00



# EXHIBIT C

IN WITNESS WHEREOF, Investor has executed this Subscription Agreement this 11 day of December, 2019 (the "Subscription Date").

If Investor(s) is/are (a) natural person(s):

Jean P Rospondek  
(print name)

Jean P Rospondek  
Signature

STANLEY J Rospondek  
(print name)

Stanley J Rospondek  
Signature

If Investor is other than a natural person:

\_\_\_\_\_  
(print name)

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

**MUST BE SIGNED BY CUSTODIAN OR TRUSTEE  
IF PLAN IS ADMINISTERED BY A THIRD PARTY.**

Custodian/Trustee Name: \_\_\_\_\_

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

Accepted by:

PISCES INCOME FUND LLC,  
a Delaware limited liability company

By: Shannon Ray Westhead  
Shannon Ray Westhead, Member

By: Alec James Vagnozzi  
Alec James Vagnozzi, Member

Date: 12/17/19

# EXHIBIT D

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed and delivered by their proper and duly authorized officers as of the day and year first above written.

**ORIGINAL ISSUER:**

**PISCES INCOME FUND LLC**

By: Shannon Westhead  
Shannon Westhead, Member

By: Alec Vagnozzi  
Alec Vagnozzi, Member

**SUCCESSOR ISSUER:**

**PISCES INCOME FUND PARALLEL LLC**

By: Shannon Westhead  
Shannon Westhead, Member

By: Alec Vagnozzi  
Alec Vagnozzi, Member

**PURCHASER/INVESTOR:**

Sign Name: Stanley J Rospondek

Print Name: Stanley J Rospondek

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed and delivered by their proper and duly authorized officers as of the day and year first above written.

**ORIGINAL ISSUER:**

**PISCES INCOME FUND LLC**

By: Shannon Westhead  
Shannon Westhead, Member

By: Alec Vagnozzi  
Alec Vagnozzi, Member

**SUCCESSOR ISSUER:**

**PISCES INCOME FUND PARALLEL LLC**

By: Shannon Westhead  
Shannon Westhead, Member

By: Alec Vagnozzi  
Alec Vagnozzi, Member

**PURCHASER/INVESTOR:**

Sign Name: Jean P. Rospondek

Print Name: Jean P. Rospondek

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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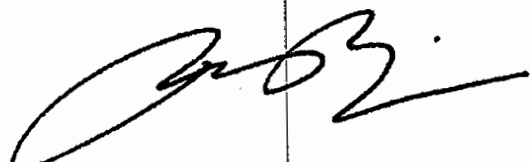
**ORDER SETTING BRIEFING SCHEDULE FOR CLAIM DETERMINATION**

THIS CAUSE comes before the Court upon Court-Appointed Receiver Ryan K. Stumphauzer's Motion to (1) Approve Proposed Treatment of Claims and (2) for Determination of Ponzi Scheme, ("Motion"), [ECF No. 1843]. The Court having carefully reviewed the Motion and the record in this matter, it is hereby

**ORDERED AND ADJUDGED** as follows:

1. All claimants with outstanding objections as to the Receiver's determination of their claim shall file a response to the Motion of no more than **ten (10) pages on or before May 7, 2024**.
2. The Receiver shall file a reply to each response, or each category of response if applicable, **on or before May 21, 2024**. Each reply shall be no more than **ten (10) pages**.

**DONE AND ORDERED** in Miami, Florida, this 23rd day of April, 2024.



**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

5. Interest payments of \$166.67 were paid on the following dates, 6/3/2020 and 7/2/2020. At that time all payments stopped.
6. The next news that we heard about Par Funding/Pisces Parallel Fund were fraud claims and arrests.
7. We are seeking relief for at least our initial investment of \$50,000.00 and at least a portion of the \$5,000.00 in interest promised less money received which in total was \$1166.68
8. We ask this relief as my husband and I at 73 and 72 years of age are still working and try to make informed investments to support us, hopefully, well into the future. The principals behind the company were found to be criminals and investors have a right to regain their hard earned money, which unfortunately was used to support a lavish lifestyle for the owners of the company. \$50,000 or \$55,000.00 is a lot of money that we can't afford to just have it disappear.

May 3, 2024

Respectfully submitted,

1207 Parry Avenue  
Cinnaminson NJ 08077

h) 856-786-2034

cell stan 609-636-3508 srosp1@comcast.net

cell Jean 215-431-4630 jps1pga@comcast.net

Stanley J. Rospondek  
Jean P. Rospondek



<b>P</b>	US POSTAGE PAID IMI 05/03/2024 From 08077 Zone 6		Pitney Bowes CominPrice Flat Rate Envelope	028W0002310235 2000001645
	<b>USPS PRIORITY MAIL®</b>			
Stanley Rospondek 1207 Parry Ave Cinnaminson NJ 08077-2244			Expected Delivery Date: 05/06/2024	
			<b>0002</b>	
			<b>C075</b>	
	CLERKS OFFICE SOUTHERN DISTRICT OF FL WILKIE D. FERGUSON JR. US COURT HOUSE 400 N MIAMI AVE MIAMI FL 33128-1801			
<b>USPS TRACKING #</b>				
				
9405 5091 0515 6572 0550 95				





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- Limited international insurance.\*\*
- When used internationally, a customs declaration form is required.

\*Insurance does not cover certain items. For details regarding claims exclusions see the Domestic Mail Manual at <http://po.usps.com>.

\*\* See International Mail Manual at <http://po.usps.com> for availability and limitations of coverage.

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	Zone 6		0200001645
	Pitney Bowes CommPrints Flat Rate Envelope		

#### USPS PRIORITY MAIL®

Stanley Rospondek  
1207 Parry Ave  
Cinnaminson NJ 08077-2244

Expected Delivery Date: 07/09/2024

0002

C075



CLERKS OFFICE SOUTHERN DISTRICT OF FL  
WILKIE D. FERGUSON JR. US COURT HOUSE  
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MIAMI FL 33128-1801

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