UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 20-CV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

٧.

COMPLETE BUSINESS SOLUTIONS GROUP, INC. d/b/a PAR FUNDING, et al.,

Defendants.

OBJECTION TO THE MOTION OF RECEIRER'S DETERMINATION OF CLAIMS

I object to the method of calculating the amount that is owed to our fund. The order states that any interest that had been paid in 2019 would be subtracted from our outstanding note. If another investor had not reinvested with par funding prior to Par funding halting payments, the receiver did not claw back and reclaim the interest that had been paid to them. As such our investment is not being treated fairly.

Interest paid in 2019 was allocated to our partners in 2019 in proportion to their capital accounts. To reclaim that interest and reduce our outstanding note disadvantages our current partners by that amount and is not appropriate treatment in my opinion.

Submitted by Scott W. Ryan, Managing General Partner of Index Arbitrage Partners, LP.

Scott W. Ryan





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U.S. District Court
Southern Destrict of Florida
400 N. Mioni avenue
Mioni, Florida 33128

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