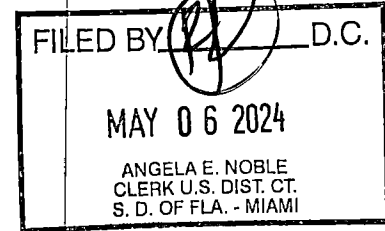


May 4, 2024

Clerk's Office
Southern District of Florida
Wilkie D. Ferguson Jr. US Courthouse
400 North Miami Avenue
Miami, FL 33128



Ref: SEC v Complete Business Solutions Group Inc. et al; Case No. 9:20-cv-81205-RA

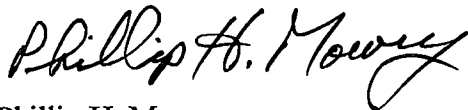
TWIMC:

I am writing to provide my response to the current settlement plan as directed by recent communications from the Par Funding Receivership Team. I have previously objected to one claim per the Notice of Determination I received - Claim No. 162. I agreed with the Receiver's determination of claims 158, 159, 160, 161 and 163. The objection submission number for Claim No. 162 was AWXSYA71T9. A copy of the full objection narrative for Claim #162 is attached with the supporting documentation as previously submitted.

I subsequently had communications with Gabria Brenner and George Shoup of the DSI Consulting Group on 3/5/24 and 3/15 24. Copies of those emails are also attached. Those conversations did not lead to a clear conclusion to my objection.

My objection is based on the determination to reach back into past closed CBSG investments and use previous interest earnings to offset current funds due from my three claims (161, 162, 163). The matter with Claim #162, Investment Fund IV, is apparently due to sloppy file notations by ABFP, not my actions. Further, my objection also extends to any such claw backs due to the recent "Ponzi" determination. Those investments were closed and taxes paid on the interest earned (reducing their value by 30 to 35%). To use previous interest payments to reduce monies due from my three well documented claims is not fair, nor acceptable!

Respectfully submitted,



Phillip H. Mowry
811 Woods End Ct.
Collegeville, PA 19462

CLAIM # 162

Full objection narrative for Claim # 162

I understand the allowed methodology, i.e. deduction of interest earned from principal, and I understand 161 & 163 determinations. However, using the same process for claim 162 yields a \$54,135 higher claim than that allowed. It appears you are deducting interest from two separate funds: "ABFP Income Fund" which ran from 4/2018 to 4/2019, and "ABFP Income Fund IV" which ran from 4/2019 to 4/2020. My Claim 162 applied only to "Fund IV" per the attached Summary, and 2019 & 2020 INT forms. I object to the additional \$54,135 interest deduction in the allowed claim.

Note Dated: 4/10/2019

Maturity Date: 4/10/2020

Monthly payment: 4678.33

CLASS D PROMISSORY NOTE

FOR VALUE RECEIVED, ABFP INCOME FUND, LLC, a Delaware limited liability company with an address at 234 Mall Boulevard, Suite 270, King of Prussia, Pennsylvania 19406 ("Borrower") promises to pay to the order of Phillip Mowry ("Lender"), in legal tender of the United States, the sum of Four hundred one thousand Dollars (\$ 401,000.00) (the "Principal Amount"), together with interest on the unpaid Principal Amount at the rates and on the terms set forth in this Class D Promissory Note (this "Note").

1. Interest Rate. The Principal Amount shall bear interest at the rate of fourteen percent (14%). Interest shall be calculated at all times on the basis of a 360 day year (each month is deemed to be 30 days).

2. Payments of Principal and Interest. Borrower shall pay principal and interest sums due under this Note as follows: (a) interest on the unpaid balance shall accrue from the [tenth/twenty-fifth] day of the month in which this Note is issued and shall be paid on the [thirteenth/twenty-eighth] day of each month thereafter, in arrears, commencing on 5/13/2019, and continuing until 4/13/2020 and (b) the Principal Amount shall be paid on the first (1st) anniversary of this Note (the "Maturity Date"). Any accrued and unpaid interest and any remaining outstanding principal shall be due and payable in full on the Maturity Date. Notwithstanding anything contained herein to the contrary, in the event that any payment is due on a date that is not a Business Day, then the payment shall be due on the first Business Day following such date. For purposes of this Note, the term "Business Day" means any day other than a Saturday, Sunday, legal holiday or day on which banks are authorized or permitted to be closed.

3. Representations and Warranties. Borrower hereby represents and warrants to the Lender (which representations and warranties shall survive until this Note has been paid in full) that:

(a) Power and Authority; Authorization; Enforceability. Borrower has full power, authority and legal right to execute, deliver and comply with the terms of this Note and, upon execution hereof, this Note shall constitute a valid and legally binding obligation of Borrower enforceable in a court of competent jurisdiction for its term.

(b) Conflict; Breach. The execution and delivery of and compliance with this Note by Borrower will not conflict with or result in a breach of any applicable law, judgment, order, writ, injunction, decree, rule or regulation of any court, administrative agency or other governmental authority, or of any agreement or other document or instrument to which Borrower is a party or by which Borrower is bound.

4. Events of Default. The occurrence of any one or more of the following events shall constitute an event of default hereunder:

(a) Borrower shall fail to make any payment of principal and/or interest due to Lender under this Note when the same shall become due and payable, and such failure continues for a period of ten (10) days;

PLAN 162

SEC v Complete Business Solutions Group Inc. et al; Case No. 9:20-cv-81205-RA

IN WITNESS WHEREOF, Investor has executed this Subscription Agreement this ____ day of MARCH 27, 2019 (the "Subscription Date").

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

PHILLIP H. MOWRY
(print name)

(print name)

Phillip H. Mowry
Signature

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: N/A

By: _____
Name: _____
Title: _____

Accepted by:

IV
ABFP INCOME FUND, LLC,
a Delaware limited liability company

By: ABFP Management Company LLC

By: [Signature]
Dean Vagnozzi, Sole Member

Date: 4/3/19

Phillip H. Mowry - ABFP Income Fund IV Summary

(No fund number was on my Promissory Note, but it was noted as Fund IV on the monthly interest payments,)

Class D Promissory Note dated 4/10/2019*

Principal amount = \$401,000.00 Paid 4/2/18* Check #4105

Monthly interest amount - \$4678.33

* This fund investmt was a re-invest of the principal from an earlier fund ^{ABFP INCOME FUND} which matured on 4/10/19 and is not part of my claims

Date Due	Amount Due	Amount received	Rec'd date
5/13/19	\$ 4,678.33	\$ 4,678.33	5/14/19
6/13/19	\$ 4,678.33	\$ 4,678.33	6/12/19
7/13/19	\$ 4,678.33	\$ 4,678.33	7/12/19
8/13/19	\$ 4,678.33	\$ 4,678.33	8/13/19
9/13/19	\$ 4,678.33	\$ 4,678.33	9/12/19
10/13/19	\$ 4,678.33	\$ 4,678.33	10/15/19
11/13/19	\$ 4,678.33	\$ 4,678.33	11/14/19
12/13/19	\$ 4,678.33	\$ 4,678.33	12/13/19
1/13/20	\$ 4,678.33	\$ 4,678.33	1/14/20
2/13/20	\$ 4,678.33	\$ 4,678.33	1/2/00
3/13/20	\$ 4,678.33	\$ 4,678.33	1/12/00
4/13/20	\$ 4,678.33	0.00	
4/10/20	\$401,000.00	0.00	
Total	\$ 457,139.96	\$ 51,461.63	\$ 405,678.33 claim, owed

BANK RECORDS WERE FURNISHED WITH MY ORIGINAL CLAIM.
 (SAMPLE ATTACHED)



SEC v Complete Business Solutions Group Inc. et al; Case No. 9:20-cv-81205-RA

CLAIM 162

Interest summary

Interest paid this statement	\$0.23
Average collected balance	\$27,348.79
Annual percentage yield earned	0.01%
Interest earned this statement period	\$0.23
Interest paid this year	\$2.65

Transaction history

Date	Check Number	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
10/3		Regencyprovidenc Payments 191003 00193-4353 Mowry, Philip H		295.00	
10/3		Capital One Crcardpmt 191002 927530180065069 Mowryphillip		2,816.26	13,408.15
10/4		SSA Treas 310 Xxsoc Sec 100419 xxxxx4516A SSA Sandra D Mowry	108.00		
10/4		SSA Treas 310 Xxsoc Sec 100419 xxxxx6242A SSA Phillip H Mowry	216.00		13,732.15
10/8		Comenity Pay Bh Web Pymt 100519 P19278724299098 Sandra Mowry		44.36	13,687.79
10/10		Bill Pay Rivercrest Golf on-Line 2126 on 10-10		351.47	13,336.32
10/11		Deposit Made In A Branch/Store	195.00		13,531.32
10/15		Abfp Income 3 Payments Phillip Mowry	2,916.67		
10/15		Abfp Income IV Payouts Phillip Mowry	4,678.33		21,126.32
10/16		SSA Treas 310 Xxsoc Sec 101619 xxxxx4516A SSA Sandra D Mowry	883.60		
10/16		SSA Treas 310 Xxsoc Sec 101619 xxxxx6242A SSA Phillip H Mowry	2,201.60		
10/16		Bill Pay Windstream Communications on-Line xxxx22149 on 10-16		2.99	
10/16		Bill Pay Pennsylvania American Water Comp on-Line Xxxxxxxxxx09790 on 10-16		29.24	23,979.29
10/18	4190	Check		10.94	23,968.35
10/22		Deposit	256.85		24,225.20
10/25	4191	Check		80.00	24,145.20
10/28		Deposit	2,190.47		
10/28		Merchant Factori Deposit Dp65832037 Phillip Mowry	2,010.00		
10/28		Online Transfer From Phm Associates Inc Ref #1b0736Lzrv Business Checking Salary Loan	130,000.00		
10/28		Bill Pay Western Mass. El Recurring xxxxx81051 on 10-28		48.06	
10/28		Bill Pay Peco Energy Recurring xxxxx17013 on 10-28		93.35	
10/28	4189	Check		45.00	158,159.26
10/29		Bill Pay Pennsylvania American Water Comp on-Line Xxxxxxxxxx09790 on 10-29		24.96	
10/29		Bill Pay Comenity Bank Bjs Mastercard Recurring Xxxxxxxxxx69762 on 10-29		46.57	
10/29	4192	Check		465.12	157,622.61
10/30	4194	Check		145,000.00	12,622.61
10/31		Comm of PA Annuitant 191031 AP0050623133 Phillip H Mowry	1,539.36		
10/31		Interest Payment	0.23		14,162.20
Ending balance on 10/31					14,162.20
Totals			\$146,996.11	\$149,353.32	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.



SÈC v Complete Business Solutions Group Inc. et al; Case No. 9:20-cv-81205-RA

CLAIM 162

Interest summary

Interest paid this statement	\$0.19
Average collected balance	\$23,314.35
Annual percentage yield earned	0.01%
Interest earned this statement period	\$0.19
Interest paid this year	\$2.84

Transaction history

Date	Check Number	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
11/1		Deposit	4,000.00		18,162.20
11/4		Capital One Crcardpmt 191102 930630180069335 Mowryphillip		93.71	
11/4		Regencyprovidenc Payments 191104 00193-4353 Mowry, Philip H		295.00	17,773.49
11/5		Deposit	556.85		18,330.34
11/6		Bill Pay Windstream Communications on-Line xxxx22149 on 11-06		3.03	
11/6		Bill Pay Rivercrest Golf on-Line 2126 on 11-06		469.71	
11/6		Comenity Pay Bh Web Pymt 110519 P19309730003204 Sandra Mowry		46.57	17,811.03
11/12		Deposit Made In A Branch/Store	154.00		17,965.03
11/14		Abfp Income 3 Payments Phillip Mowry	2,816.67		
11/14		Abfp Income IV Payouts Phillip Mowry	4,678.33		
11/14	4196	Deposited OR Cashed Check		130.00	
11/14	4193	Check		1,404.92	24,025.11
11/15	4195	Check		36.00	23,989.11
11/19		Deposit Made In A Branch/Store	2,000.00		25,989.11
11/20		SSA Treas 310 Xxsoc Sec 112019 xxxxx4516A SSA Sandra D Mowry	695.60		
11/20		SSA Treas 310 Xxsoc Sec 112019 xxxxx6242A SSA Phillip H Mowry	2,225.60		28,910.31
11/22		Bill Pay Peco Energy Recurring xxxxx17013 on 11-22		98.66	28,811.65
11/26		Merchant Factori Deposit Dp67780419 Phillip Mowry	2,010.00		30,821.65
11/27		Comm of PA Annuitant 191127 AP0051289786 Phillip H Mowry	1,539.36		
11/27		Bill Pay Comenity Bank Bjs Mastercard Recurring Xxxxxxxxxx69762 on 11-27		123.86	32,237.15
11/29		Bill Pay Western Mass. El Recurring xxxxxx81051 on 11-29		75.09	
11/29		Interest Payment	0.19		32,162.25
Ending balance on 11/30					32,162.25
Totals			\$20,776.60	\$2,776.55	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Summary of checks written (checks listed are also displayed in the preceding Transaction history)

Number	Date	Amount	Number	Date	Amount	Number	Date	Amount
4193	11/14	1,404.92	4195 *	11/15	36.00	4196	11/14	130.00

* Gap in check sequence.

Monthly service fee summary

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

REPORTED ON BANK WIRE DEPOSITS AS ABFP INCOME FUND IV.

CORRECTED (if checked)

PAYER'S name, street address, city or town, state or province, country, ZIP or foreign postal code, and telephone no. ABFP INCOME FUND LLC <i>FUND IV</i> C/O STUMPHAUZER FOSLID SLOMAN ROSS & KOLAYA, PLLC 2 S. BISCAYNE BLVD., SUITE 1600 MIAMI, FL 33131		Payer's RTN (optional) 4698... 23	OMB No. 1545-0112 2020 Form 1099-INT	Interest Income	
PAYER'S TIN 36-4888530		1 Interest income 14034.99 /OK	2 Early withdrawal penalty \$		Copy B For Recipient
RECIPIENT'S TIN 101-34-6242		3 Interest on U.S. Savings Bonds and Treas. obligations \$	4 Federal income tax withheld 0.00	5 Investment expenses \$	
RECIPIENT'S name, street address, city or town, state or province, country, and ZIP or foreign postal code PHILLIP MOWRY 811 WOODS END COURT COLLEGEVILLE, PA 18940		6 Foreign tax paid \$	7 Foreign country or U.S. possession \$	8 Tax-exempt interest \$	
FATCA filing requirement <input type="checkbox"/>		10 Market discount \$	11 Bond premium \$	9 Specified private activity bond interest \$	
Account number (see instructions)		12 Bond premium on Treasury obligations \$	13 Bond premium on tax-exempt bond \$	14 Tax-exempt and tax credit bond CUSIP no.	
		15 State PA	16 State identification no.	17 State tax withheld 0.00	

Subject: Par Funding - Objection (Philip Mowry)

From: Gabria Brenner <GBrenner@DSIConsulting.com>

Date: 3/5/24, 1:46 PM

To: "PHM3@VERIZON.NET" <PHM3@VERIZON.NET>

CC: "George E. Shoup" <GShoup@DSIConsulting.com>, Timothy Kolaya <tkolaya@sknlaw.com>

CLAIM 162

Hi Philip,

I am a financial advisor assisting the Receiver of Complete Business Solutions Group, Inc., d/b/a Par Funding, et al. ("CBSG") and I can respond to your objection to the Receiver's notice of determination of your claim amount.

The Claims Motion also included instructions for investors to calculate their claims to determine the "Net Investment".

Pre-Receivership Claim Amount. For all Claims other than Administrative Claims, please state the amount of your claim as of July 28, 2020. Investors, if you claim to have made a loan to, obtained a promissory note from, or hold an interest in a Receivership Entity, please fill out and attach an "Investor Supplement to Proof of Claim Form" (see Exhibit A) to account for each time you made an investment with or provided funds to the applicable Receivership Entity and the date and amount of each transaction thereafter. You must also provide a chronological accounting indicating the date and amount of any withdrawals made by or payments received by you from any Receivership Entity, whether such payments were denominated as the return of principal, interest, commissions finder's fee, or otherwise.

Note, The Receivership has no record of your investment in the ABFP Fund IV. Your investment and interest payments received totaled below are all in regards to ABFP Income Fund, ABFP Income Fund 3, and ABFP Income Fund 6.

Below is the detail of the original investments and cash received, showing the calculation of the net investment.

[cid:image002.png@01DA6EFB.1AAEF050]

I hope this answers your questions with respect to your objection to the amount of your claim. If this email addresses the basis of your objection, please confirm via a return email that you withdraw your objection to the Receiver's determination of your claim amount. If your objection relates to any other matter, such as rights to recoveries and/or any other matter not part of the claim determination process, this matter will not be addressed at this time and is outside of the scope of the claims determination process. If you have any questions or would like to schedule a call to discuss, please let me know.

Regards,

[Icon Description automatically generated with medium confidence]

10 South LaSalle Street
Suite 3300
Chicago, IL 60603
Gabria A. Brenner

SEC v Complete Business Solutions Group Inc. et al; Case No. 9:20-cv-81205-RA

CLAIM 167

Subject: RE: Par Funding - Objection (Phillip Mowry)
From: "George E. Shoup" <GShoup@DSIConsulting.com>
Date: 3/15/24, 3:07 PM
To: Phillip Mowry <phm3@verizon.net>
CC: Timothy Kolaya <tkolaya@sknlaw.com>, Gabria Brenner <GBrenner@DSIConsulting.com>

Good afternoon Mr. Mowry,

I think the discrepancy here is that ABFP's records show the original \$401K investment in ABFP Fund #1 vs #4. I am unclear why this is so.

Are we in agreement on the amounts of the original 3 investments?

4/3/18 \$401,000
4/4/19 \$350,000
1/24/20 \$200,000

I RESPONDED "YES"

I do not expect there to be a difference on the eventual distributions you will receive based on being in fund #1 or fund #4.

THIS WAS NOT MADE CLEAR TO ME ?
Phillip Mowry

545 Metro Place South
Suite 100
Dublin, OH 43017

George E. Shoup III
Managing Director

Direct: (380) 201-7743
Email: gshoup@dsiconsulting.com

www.dsiconsulting.com

vCard | LinkedIn

-----Original Message-----

From: Phillip Mowry <phm3@verizon.net>
Sent: Friday, March 15, 2024 6:29 AM
To: Gabria Brenner <GBrenner@DSIConsulting.com>
Cc: George E. Shoup <GShoup@DSIConsulting.com>; Timothy Kolaya <tkolaya@sknlaw.com>
Subject: Re: Par Funding - Objection (Philip Mowry)

Ms. Brenner,

Thank you for your response on this matter. I understand the claim filing procedures noted in the first part of your email, and I believe I followed them correctly. However, I don't understand the second note relative to ABFP Income Fund IV as follows:

"Note, The Receivership has no record of your investment in the ABFP Fund IV."

Attached is a partial copy of the Class D Promissory Note from ABFP Income Fund IV, LLC which was submitted with my original claim in total. The first page shows my investment in that fund was from 5/13/2019 to 4/13/2020. The second page shows our signatures dated 3/27/2019, and that of Dean Vagnozzi dated 4/3/19. They confirm my investment in that fund for the 2019/2020 period noted. The Wells Fargo bank deposit records submitted with my original investment also indicate the interest payments were from the ABFP Income Fund IV. The third attached page is a copy of one month's bank record clearly showing the typical deposit as Fund IV. The earlier ABFP Income Fund investment closed in 2018, and was not a part of this matter.

Please let me know your decision on this appeal as soon as possible.

Obviously, we are very anxious to receive payment for the significant funds which have been held for several years, thus postponing my retirement. Thank you,

Phillip Mowry

