

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

Date – 05-06-2024

RE -SEC v Complete Business Solutions Group Inc. et al; Case No. 9:20-cv-81205-RAR
Claim 20257 - Claim Validation Code AZX04013

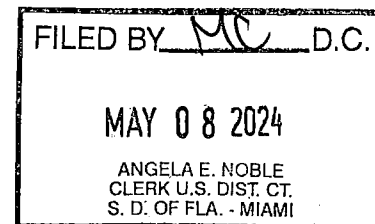
My investment was facilitated through the agent fund listed below:

Investment Fund: Merchant Services Income Fund

Contact: Michael Tierney

Phone: 267-752-3262

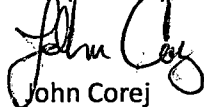
Email: mtierney933@gmail.com



Objections to the Receiver's Motion (1) to Approve Claims Determinations:

1. Receiver's approved fund calculation does not match actual total dollars invested by the agent fund. Receiver provided no mathematical documentation as to how the approved amount was calculated or the line item detail approved per individual investor. Detailed accounting per individual investor needs to be provided for review and approval.
2. Receiver is denying inclusion of ongoing IRA annual custodian account maintenance fees to maintain an account open at CamaPlan for this fund as part of the principle investment amount while waiting for final resolution of this case. It has been 4 years of additional fees which have totaled \$1400 for me personally and should be added to my initial principle investment when determining total claim amount.
3. Individual investors in the agent fund should be provided full disclosure and receive all communications and documents provided to the agent fund manager.
4. Related Eckert Seamans Mal-Practice Case – the insurance proceeds from this settlement should only be eligible for agent funds who utilized Eckert Seamans. My agent fund manager used Eckert Seamans so we should qualify for these funds. It is not equitable to distribute these funds to investors of agent funds who utilized other insurance providers. Agent funds which used another insurance provider need to file a separate suit with those providers for damages.
5. The receiver has been receiving exorbitant quarterly fees to manage this process for 4 years and investors still have not received any resolution or any claim amounts. Based on the receiver's statement of balance of cash on hand, it is not unreasonable that this cash be used to start paying investors now in a staggered fashion with the understanding that future funds will also be available based on the other pending assets of the receivership. The claim process is taking entirely too long.

Respectfully,



John Corej

3 Thames Court
Mt Laurel, NJ 08054

(609) 923-8633

John-corej@comcast.net

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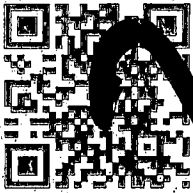
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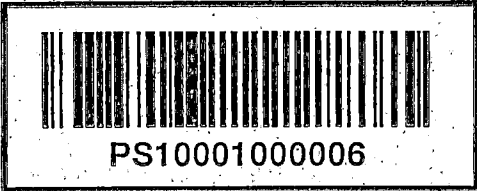
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EP13F July 2022
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