

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 20-CV-81205-RAR

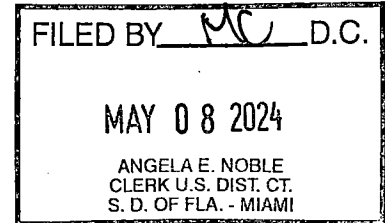
SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

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

Defendants.



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**DECLARATION OF MICHAEL WHEATLEY**

I, Michael Wheatley, as the Chapter 7 Trustee for the James Brad Law Bankruptcy Estate (“Bankruptcy Trustee”), having been duly sworn under oath, deposes and states:

1. I make the statements in this Declaration based upon my personal knowledge, review of my file of the James B. Law Bankruptcy Estate file, and the review of documents relating to my claims submitted to Ryan Stumphauzer as Receiver in this case.
2. I have a Master’s in Business Administration, a BS in Marketing, a BS in Accounting, and I am a Certified Public Accountant with capacity to testify as to all matters herein.
3. I act as a Trustee in bankruptcies filed under Chapter 7, Chapter 11 and Chapter 12 pending in the Bankruptcy Court for the Western District of Kentucky.
4. I am the person appointed as Trustee for the James Brad Law Bankruptcy Estate, currently pending in the Bankruptcy Court for the Western District of Kentucky (Case No. 19-32508).

- 5. On March 20, 2023, I filed verified Confirmation Number/Claim Number 0000020602 against "Business Solutions Group, Inc. d/b/a Par Funding" and verified Confirmation Number/Claim Number 0000020603 against "Fast Advance, LLC" (collectively the "Claim") as the Bankruptcy Trustee, in amounts to be determined.
- 6. On December 20, 2023, I filed additional information and documentation supplementing the Claims ("Claim Supplement") with documentation specifying the claimed damages owed to the James B. Law Estate as follows:

Building Value	\$605,000.00
Statutory Damages (KRS 382.365)	\$547,500.00
Attorneys' Fees (KRS 382.365)	\$155,258.00
<b>Total Damages</b>	<b>\$1,307,758.00</b>

- 7. The information contained in the initial Claim and Claim Supplement, and all attached documentation thereto, are true and correct under penalty of perjury under the laws of the United States of America.
- 8. I declare under penalty of perjury that the foregoing is true and correct.

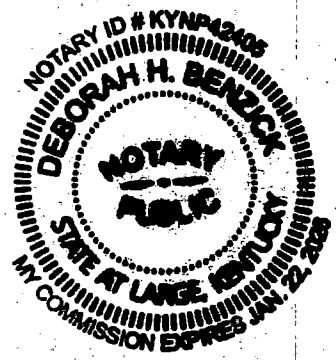
Michael Wheatley  
 Michael Wheatley

5/06/2024  
 Date

STATE OF KENTUCKY )  
 )ss  
 COUNTY OF JEFFERSON)

Subscribed and sworn Affiant this 6 day of May 2024.

Deborah H. Benzick  
 NOTARY PUBLIC



My commission expires: Jan. 22, 2026

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2. I have a Master’s in Business Administration, a BS in Marketing, a BS in Accounting, and I am a Certified Public Accountant with capacity to testify as to all matters herein.
3. For over 25 years I have served as a Trustee in bankruptcies filed under Chapter 7, Chapter 11 and Chapter 12 pending in the Bankruptcy Court for the Western District of Kentucky.
4. I am the person appointed as Trustee for the James Brad Law Bankruptcy Estate, currently pending in the Bankruptcy Court for the Western District of Kentucky (Case No. 19-32508).

