

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.

**RECEIVER’S NOTICE OF FILING INVESTOR RESPONSE TO
RECEIVER’S MOTION (1) TO APPROVE PROPOSED TREATMENT OF CLAIMS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ hereby gives notice of filing the attached response to the Receiver’s Motion (1) to Approve

¹ The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding (“CBSG”); Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment Fund 2 LP; MK Corporate Debt Investment Company LLC; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consultants, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; Liberty Eighth Avenue LLC; The LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management LLC; and ALB Management, Inc., and the Receivership also includes the property located at 107 Quayside Drive, Jupiter, Florida 33477.

Proposed Treatment of Claims and (2) for Determination of Ponzi Scheme [ECF No. 1843] (the “Claims Motion”):

- Response of Michael Stierstorfer, MD (attached as *Exhibit 1*), which was filed as ECF No. 12 in *Securities and Exchange Commission v. ABFP Income Fund Parallel, LLC, et al.*, Case No. 23-cv-23721-BB (S.D. Fla.). Although this response pertains to the Claims Motion pending before this Court, the Clerk docketed this document—which was submitted to the Clerk by mail and omitted a case number—in Case No. 23-cv-23721-BB.

Dated: May 13, 2024

Respectfully Submitted,

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By: /s/ Timothy A. Kolaya
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Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 13, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya _____
TIMOTHY A. KOLAYA

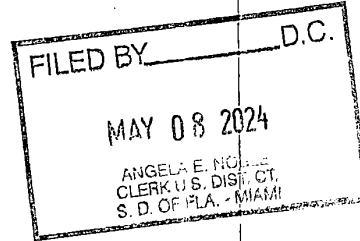
Exhibit “1”

23 CV
23721

Michael Stierstorfer, MD
2101 Market Street, Unit 2802
Philadelphia, PA 19103

May 3, 2024

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



To whom it may concern,

I am an investor in ABFP Multi-Strategy Investment Fund II (M-S II) and I again object to the inclusion of this fund in the receivership. Dean Vagnozzi, without investor knowledge or approval, invested a small percentage (?~10%) of the monies invested in M-S II in a Par Funding merchant capital advance product. This ~10% is the only portion of M-S II that is not easily separable (thus, by definition, "commingled") with Par and thus should be part of the receivership. **The other ~90% and the \$7 million+ in maturities from the M-S II whole life policies clearly are not commingled, should never been part of the receivership, and should be transitioned to outside management for exclusive distribution (minus policy premium payments and market-rate management fees) to their rightful owners--those who invested in this fund.** At least one qualified, appropriately-licensed financial advisory team was proposed months ago to the receiver for this purpose.

The receiver's expressed consideration of wholesale of the outstanding policies in the M-S II fund would be a catastrophic injustice to its investors, returning pennies on the dollar, instead of the considerable value they still have. Independent of this consideration, at the very least, the \$7 million+ in maturities should, again, be exclusively distributed to the rightful owners; namely, to M-S II investors, as should any monies retrieved from such a wholesale.

In consideration of the above, I do not object to the determination of my claims calculation, but this matter is certainly and equally objectionable. Given that the court has proclaimed fairness and equity for all investors as the ultimate goal of the proceedings vs. Par, there should be no alternative for the disposition of the ABFP Multi-Strategy Investment II Fund.

While I am not an investor in ABFP Multi-Strategy Investment Fund I, its disposition should be handled in a similar fashion since similar circumstances apply.

Thank you for your consideration.

Best regards,

Michael Stierstorfer, MD

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