

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:20-cv-81205-RAR
Referred to Magistrate Judge Reinhart

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

NOTICE OF FILING OBJECTION TO SETTLEMENT AGREEMENT

Non-Parties, Eckert Seamans Cherin & Mellot, LLC (“Eckert Seamans”) and John W. Pauciulo (“Mr. Pauciulo”), give notice to the Court and the parties of the attached Objection, submitted by Andy McKinley, to the Settlement Agreement among Receiver, putative class plaintiffs, and Eckert Seamans Cherit & Mellott, LLC and John Pauciulo and related Bar Order. See email dated June 26, 2024 attached as **Exhibit A**.

Respectfully submitted,
DAMIAN | VALORI | CULMO
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Cherin & Mellot, LLC and John Pauciulo*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic transmission via this Court's CM/ECF filing system on the 27th day of June, 2024, on all counsel or parties who have appeared in the above-styled action.

/s/Melanie E. Damian
Melanie E. Damian

EXHIBIT A

From: [ANDY MCKINLEY](#)
To: [Katie Recker](#)
Subject: Objection to Settlement Agreement
Date: Wednesday, June 26, 2024 8:47:06 PM

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Catherine:

This letter will serve as official notice that I object to the Notice of proceedings to approve settlement among receiver, putative class plaintiffs, and Eckert Seamans Cherit & Mellott, LLC and John Pauciulo and Bar Order (Case No. 20-CV-81205-RAR) based upon the grounds that any investor in Par Funding that did not use Eckert Seamans has no right to the distribution from Eckert's insurance company as a result of malpractice.

Regards,

Andy McKinley

Jade Fund LLC

1423 S Howard St.

Phila, PA 19147

215-480-1901