

**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.

**CLAIMANT SHANNON WESTHEAD’S OPPOSITION TO RECEIVER’S MOTION TO
APPROVE PROPOSED PLAN OF DISTRIBUTION AND AUTHORIZE FIRST
INTERIM DISTRIBUTION**

Claimant Shannon Westhead (“Westhead”) respectfully submits this Opposition to the Receiver’s Motion to Approve Proposed Plan of Distribution and Authorize First Interim Distribution, ECF No. 2014. For the reasons set forth below, Westhead’s claim to the receivership estate should not be relegated to a Class 8 Claim, and she should instead be treated as a Class 3 secured investor.

INTRODUCTION

As a recent college graduate, Westhead began her career working as an executive assistant for Dean Vagnozzi at A Better Financial Plan (“ABFP”) starting in 2017. During her employment there, Westhead learned from Vagnozzi and John Pauciulo, an attorney at Eckert Seamans Cherin & Mellott, LLC (“Eckert Seamans”), among others, about investment opportunities in the merchant cash advance industry. Westhead relied on their representations concerning the

company's business and track record at providing investor returns and on due diligence conducted by Pauciulo, a former SEC attorney; as a result, she trusted the merits of the investment. Vagnozzi, Pauciulo, and other sophisticated investors were excited about the investment opportunity, which gave Westhead confidence in the investment. Westhead believed in the investment opportunity so strongly that she invested more than half of her own net worth into investments touted by Vagnozzi and blessed by Pauciulo, including a \$50,000 investment in the ABFP Multi Strategy Investment Fund, which she believed to be a legitimate, safe, reliable investment. As the DOJ's indictment against Complete Business Solutions Group, Inc. d/b/a Par Funding ("CBSG") and its principals makes clear, Joseph LaForte and others provided false and misleading information to investors, and Westhead was one of those investors who was misled by these misrepresentations. Westhead was as blindsided as any other investor when she learned of CBSG's fraud; though she worked at ABFP, Westhead had no indication that CBSG was anything other than an above-board company producing returns for her and ABFP's investors. When she learned of the fraud and received correspondence from the Receiver, Westhead promptly filed a proof of claim form for her investment.

Now, the Receiver seeks to treat Westhead's claim as that of an "insider" to be paid only once all other classes are paid in full. The Receiver bases this proposal on Westhead's alleged "role in recruiting additional investors" to invest in CBSG and also cites the SEC's pending lawsuit against her. The Receiver tries to sweep her into the group of others who have been deemed "insiders," such as a former ABFP employee who acted as a sales agent for CBSG and received commissions in return. But Westhead did not solicit investors to invest directly into CBSG. She merely owned and managed a fund into which clients could invest, and that fund itself ultimately

made an investment in CBSG. Critically, Westhead is not seeking commissions through her claim; rather, she is seeking to recoup her investment just like any other Class 3 investor.

Though the SEC brought claims against Westhead, that case is in early stages of discovery and no findings of liability have been made. The SEC does not allege that Westhead made any actual misstatement, but rather bases its claims on allegations that Westhead failed to disclose information about regulatory actions against CBSG and its principal's criminal history. But for these items, Westhead relied on, among other things, guidance and direction from her ABFP supervisors, legal advice and due diligence conducted by ABFP's attorneys concerning CBSG, and offering documents drafted by her fund's retained outside counsel, Eckert Seamans. The underlying evidence in that matter will demonstrate that the SEC's allegations against Westhead are meritless. For these and the following reasons, the Court should exercise its discretion to deny the Receiver's motion as to Westhead and to fairly classify her claim as Class 3.

FACTUAL BACKGROUND

In July 2017, shortly after graduating college, Ms. Westhead took a job as an executive assistant at ABFP working for Dean Vagnozzi. Case No. 1:23-cv-23749-RAR ECF No. 62, Answer ¶ 11. While employed there, Westhead learned from Vagnozzi, Pauciulo, and others about investment opportunities in the merchant cash advance industry, which they represented as a legitimate, safe, and reliable investment. As a result, in March 2019, Westhead made a \$50,000 investment in the ABFP Multi Strategy Investment Fund.¹ *See* Ex. A.

During her time working at ABFP, Westhead eventually became a co-owner and co-manager of the Pisces Income Fund, LLC ("Pisces"). Case No. 1:23-cv-23749-RAR ECF No. 62,

¹ Westhead also made a \$60,000 investment in Spartan Income Fund, which is a fund that invested in CBSG. Westhead's claim relating to her Spartan investment was denied by the Receiver as duplicative of a claim asserted by the fund on behalf of beneficial interest owners (including Westhead).

Answer ¶ 11. Pisces was formed by attorney John Pauciulo and his law firm Eckert Seamans, who drafted, prepared, and edited the Pisces offering documents that were provided to investors. *Id.* ¶ 82. Pauciulo also advised Dean Vagnozzi and ABFP, including Westhead, regarding due diligence on CBSG and necessary disclosures. *Id.* ¶¶ 84-85, 87, 89, 91, 93. Westhead relied on the direction and legal advice of Pauciulo and others regarding this due diligence and disclosure of relevant information to investors. *Id.* The Pisces offering documents made clear that investors were investing in Pisces, and their investments were governed by a promissory note with Pisces. *See* Case No. 1:23-cv-23749-RAR, ECF No. 31-2. Pisces investors did *not* invest directly with CBSG; Pisces itself was the only investor in CBSG. Case No. 1:23-cv-23749-RAR ECF 62, Answer ¶ 3. Westhead received compensation from Pisces as owner. *Id.* ¶ 102. CBSG did not compensate Westhead in any manner. *Id.* ¶ 101.

In May 2023, CBSG and four of its principals, including Joseph LaForte, were indicted in the Eastern District of Pennsylvania. *See* Case No. 2:23-cr-00198-MAK, ECF No. 1. The 63-count indictment alleges that LaForte and others made false and misleading representations about CBSG and concealed these facts from investors. *Id.* Westhead is not a defendant in this action.

In September 2023, the SEC filed a complaint in the Southern District of Florida against Westhead, Pisces, and others alleging that Westhead sold unregistered securities for CBSG, and in doing so, misled investors by failing to disclose regulatory actions against CBSG and LaForte's criminal history, all in violation of the securities laws. *See* Case No. 1:23-cv-23749-RAR, ECF No. 1.

After CBSG's assets were placed in a receivership, Westhead timely submitted a proof of claim form to the Receiver for her own \$50,000 ABFP Multi Strategy Investment Fund investment. *See* Ex. A. The Receiver argues that because of Westhead's alleged "role in recruiting additional

investors” to invest in CBSG, she is an “insider,” and her claim should be relegated to Class 8, which is not paid until all other classes are paid in full. ECF No. 2014 at 18, 47.

LEGAL STANDARD

In a receivership resulting from an SEC enforcement action, “[t]he district court has broad powers and wide discretion to determine relief.” *SEC v. Elliott*, 953 F.2d 1560, 1566 (11th Cir. 1992). The Court’s discretion “derives from the inherent powers of an equity court to fashion relief.” *Id.* When exercising these equitable powers, “the Court must ultimately determine how the Receivership’s assets should be distributed to Defendants’ investors and creditors.” *SEC v. Bivona*, No. 16-cv-01386-EMC, 2017 WL 4022485, at *6 (N.D. Cal. Sep. 13, 2017). When the Court reviews a proposed plan, a court “must ‘satisf[y] itself that the distribution of proceeds . . . is fair and reasonable.’” *Id.* at *17 (citation omitted).

ARGUMENT

Westhead is not properly considered an insider and relegating her claim to a Class 8 Claim—only to be paid after all other classes are paid in full—would not be a fair and reasonable exercise of the Court’s discretion in determining relief. First, Westhead should not be lumped together with other individuals who are seeking to recoup owed compensation for their roles in recruiting investors into CBSG. The Receiver bases its position on allegations regarding Westhead’s involvement with an entirely different entity, Pisces, and in any event, Westhead is vigorously contesting those allegations in a separate proceeding. Second, under the relevant case law, Westhead does not meet the definition of an insider.

A. Westhead is Not Similarly Situated to Michael Tierney and is not an Insider.

Westhead’s claim is based on her investment of her own money in the ABFP Multi Strategy Investment Fund. Despite this fact, the Receiver improperly tries to equate Westhead’s position to

that of another claimant, Michael Tierney, who previously submitted a claim for unpaid commissions for his part in marketing and sales of an alternative investment promoted by Dean Vagnozzi. In approving the rejection of Tierney's claim, the Court relied on the facts that: (1) there was "sufficient evidence that Mr. Tierney was involved in wrongdoing in connection with his actions of raising funds for CBSG," ECF No. 1976 at 36; (2) he was a "sales agent," *id.*; and (3) he failed to provide evidence to support his claim for unpaid commissions, *id.* Westhead's situation is completely different than that of Tierney. First, Westhead's claim relates to her own investment of \$50,000 in the ABFP Multi Strategy Investment Fund, not commissions. Westhead has provided documentation of the investment, attached as Exhibit A. Unlike Tierney, Westhead's claim is thus based on her status as an investor, not a marketer or sales agent of the fund who is collecting commissions. And, critically, there is no evidence that Westhead "was involved in wrongdoing in connection with [her] actions of raising funds for CBSG." To the contrary, though the SEC has filed suit against Westhead, the case is in early stages, and Westhead will present evidence to vigorously contest the allegations and demonstrate that she did not engage in any wrongdoing.

In recommending that Westhead be considered an insider whose claim should be denied, the Receiver states only that Westhead's claim "is properly denied based on her role in recruiting additional investors" to invest in CBSG. ECF No. 2014 at 47. However, Westhead did not recruit investors to invest into CBSG; rather, as even the SEC's complaint against Westhead makes clear, investors invested in Pisces and received a promissory note from Pisces. *See, e.g.,* Case No. 1:23-cv-23749-RAR ECF No. 1, Compl. ¶¶ 77-80. Pisces's offering documents also make clear that there was no investment in CBSG by Pisces investors. *See* Case No. 1:23-cv-23749-RAR, ECF No. 31-1 at 2-3 and ECF No. 31-2. It is therefore clear that the premise on which the Receiver's "insider" classification is based is false.

Moreover, to the extent the Receiver is relying on the existence of the SEC’s case against Westhead as support for classifying Westhead as an insider, this too fails. There, the SEC alleges that Westhead sold unregistered securities and, in doing so, misled investors by failing to make certain disclosures. The case is still in the early stages of discovery, with the parties just beginning to engage in written discovery. As Westhead stated in her answer to the SEC’s complaint, in working with Pisces investors, she relied on the direction and advice of others—including but not limited to Pisces’s attorney John Pauciulo—regarding required disclosures and due diligence of CBSG. *See generally* Answer, 1:23-cv-23749-RAR ECF No. 62.

B. Westhead is Not an Insider under the Relevant Case Law.

The relevant case law also shows that Westhead is not an “insider” whose claim should be relegated to the last group of claims. The cases that the Receiver cites to support its position that Westhead is an insider are completely distinguishable. In *SEC v. Pension Fund of America*, the individual making a claim was an employee of the fund who was seeking payment of millions of dollars of commissions. There, the court found that it was reasonable to prevent the employee from recovering where he “was paid those commissions for actions that helped further the fraud.” *SEC v. Pension Fund of Am. L.C.*, 377 F. App’x 957, 963 (11th Cir. 2010). The individual also “admitted on his proof of claim form that he had served as a sales agent and Regional Director and had put a great deal of effort into promoting and marketing Pension Fund’s products to investors.” *Id.*

In *SEC v. Merrill Scott & Associates*, the claimant was identified as a financial advisor on some of the fund’s documents and had his name appear on form letters soliciting new clients and therefore “was more intimately involved with Merrill Scott than the vast majority of clients and his activities extended to marketing and solicitation on Merrill Scott’s behalf.” No. 2:02 CV 39, 2006 WL 3813320, at *11, 12 (D. Utah Dec. 21, 2006). Additionally, the claimant had already

managed to recover some of his money by taking money that should have been part of the receivership estate. *Id.* at *12. Between this more “intimate involvement” and poor behavior with receivership assets, the court determined that he should not receive a distribution from the receivership estate. *Id.*

Westhead is not like the claimants in either of these cases. First, unlike the claimant in *Pension Fund*, Westhead is not seeking payment of any commissions, has never been a CBSG employee, and certainly did not help CBSG “further the fraud.” Second, unlike the claimant in *Merrill Scott*, Westhead has not recovered any part of her investment since the Receivership, and she did not take any money that was frozen and part of the Receivership. Furthermore, unlike the claimants in both *Pension Fund* and *Merrill Scott*, Westhead was not held out as being part of CBSG’s operations and has engaged in no conduct that would warrant her exclusion from distribution of the receivership estate. Even if Westhead had recruited investors to invest in CBSG—and she did not—her claim here is not based on that alleged conduct and is instead based only on her investment as an ordinary investor in the ABFP Multi Strategy Investment Fund.

Importantly, the Receiver has put forth no evidence that Westhead engaged in any wrongdoing and instead relies on allegations alone. The Receiver’s motion merely alleges that Westhead had a “role in recruiting additional investors” to invest in CBSG and cites to the fact that the SEC filed suit against Westhead. *See* ECF No. 2014 at 47. But the Receiver does not support its claim about recruiting investors, and the Court has made no findings regarding Westhead’s liability in the case against her. In fact, the case is in early stages of discovery, with the parties only beginning to engage in written discovery. Unlike the claimants in the cases cited by the Receiver, Westhead has not yet had the opportunity to present evidence refuting the Receiver’s and SEC’s claims. *Compare Pension Fund of Am.*, 377 F. App’x at 962 (noting that the procedures “employed

by the district court allowed both [the claimant] and the receiver to conduct discovery and submit evidence,” and the claimant “took advantage of that opportunity by presenting his arguments in support of his claim in his proof of claim, in his objection to the receiver’s objection to his proof of claim, in his response to the receiver’s motion for summary disposition of his claim, and in his motion for reconsideration”); *Merrill Scott & Assocs.*, 2006 WL 3813320, at *1, 11 (stating that the “SEC put forward considerable evidence indicating that [the claimant] was involved with Merrill Scott at a much more intimate level than typical Merrill Scott clients” and “the court has held extensive hearings on the issues involving [the claimant], where live testimony was presented and documentary evidence received”).

CONCLUSION

For the foregoing reasons, the Receiver’s Motion to Approve Proposed Plan of Distribution and Authorize First Interim Distribution and categorization of Westhead’s claim as a Class 8 Claim should be denied, and the Court should exercise its discretion to treat Westhead’s claim fairly as a Class 3 Claim.

Dated: September 9, 2024

Respectfully submitted,

s/ Ellen Ross Belfer

Ellen Ross Belfer

Fla Bar No. 685208

HILGERS GRABEN PLLC

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Miami, Florida 33131

Telephone: 239-378-7149

Email: ebelfer@hilgersgraben.com

Counsel for Shannon Westhead

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 9, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

s/ Ellen Ross Belfer

Ellen Ross Belfer

EXHIBIT A

<p>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA NO. 20-CV-81205-RAR</p> <p>SECURITIES AND EXCHANGE COMMISSION</p> <p>vs.</p> <p>COMPLETE BUSINESS SOLUTIONS GROUP, INC. d/b/a PAR FUNDING, et al.,</p>	<p>THIS SPACE RESERVED FOR ADMINISTRATIVE USE ONLY</p>
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**PROOF OF CLAIM FORM
(Instructions Attached)**

Check this box if this claim amends a previously filed claim, dated _____ (including Claim # if known)

ENTITY AGAINST WHICH YOU ARE ASSERTING A CLAIM (mark one)

Receivership Entities

- ALB Management
- Beta Abigail
- Complete Business Solutions Group d/b/a Par Funding (CBSG)
- Contract Financing Solutions
- Eagle Six Consulting
- Fast Advance Funding
- Full Spectrum Processing
- Heritage Business Consulting
- Liberty Eight Avenue
- LME 2017 Family Trust
- Recruiting and Marketing Resources (RMR)
- Abetterfinancialplan.com
- ABFP Management Company
- ABFP Income Fund
- ABFP Income Fund Parallel
- ABFP Income Fund 2
- ABFP Income Fund 3
- ABFP Income Fund 3 Parallel
- ABFP Income Fund 4
- ABFP Income Fund 4 Parallel
- ABFP Income Fund 6
- ABFP Income Fund 6 Parallel
- ABFP Multi Strategy Investment Fund
- ABFP Multi Strategy Investment Fund 2
- MK Corporate Debt Investment Company
- Fidelis Financial Planning
- United Fidelis Group
- Retirement Evolution Group
- Retirement Evolution Income Fund
- Retirement Evolution Income Fund 2

Non-Receivership Entities

- AGM Capital Fund
- AGM capital Fund 2

- Alvin Holdings
- Blue Stream Income Fund
- Cape Cod Income Fund
- Capricorn Income Fund
- Capricorn Income Fund 1 Parallel LLC
- GR8 Income Fund
- Jade Fund
- Jax Fund
- LWM Equity Fund
- LWM Income Fund 2
- LWM Income Fund Parallel
- Mariner MCA Income Fund
- MCA Capital Fund
- MCA Carolina Income Fund
- MCA National Fund
- Merchant Factoring Income Fund
- Merchant Services Income Fund Parallel
- Mid Atlantic MCA Fund
- MK One Income Fund
- Pisces Income Fund
- Pisces Income Fund Parallel
- RAZR MCA Fund
- Retirement Evolution Insured Income Fund
- Sherpa Income Fund 1
- Spartan Income Fund
- Spartan Income Fund Parallel
- STFG Income Fund
- Victory Income Fund
- Wellen Fund 1
- WorkWell Fund

OTHER (provide entity/individual name below)

1. NAME AND ADDRESS OF CLAIMANT

Name Shannon Westhead

Street Address 211 W 29th St Apt # 9D

City / State / Zip Code/ Country New York NY 10001

If Claimant is an entity, name of contact person for Claimant and title: _____

Telephone No. of Claimant: 609 440 6984

Email address of Claimant: shannon.westhead@outlook.com

Last four digits of Tax I.D. No. or SSN: 1300 Account or Reference No. _____ (if known)

2. CLAIM

2a. Basis of Pre-Receivership Claim:

Good sold or services performed

Money loaned or invested or owner, partner, member, equity or other investment interest

Taxes

Wages, salaries, benefits or compensation (fill out below and attach a detailed explanation) or unpaid compensation and benefits for services performed from _____ to _____ (dates)

Title: _____

Uncashed check issued prior to July 18, 2020

Other (attach a detailed explanation)

2b. Pre-Receivership Claim Amount: \$ 50,000

2c. Administrative (Post-Receivership) Claim:

Check this box if your claim is an Administrative Claim. Briefly state the post Receivership basis of your Administrative Claim: _____

2d: Administrative Claim Amount: \$

2e. Identify any other party who you claim may be liable to you for repayment of your claim:

2f: Legal action or claim against Receivership Entity (provide caption, date commenced, Court, Case No.):

Amount recovered from other parties: \$ _____

If court judgment, date obtained: _____

2g: Check this box if the claim includes interest or other Charges, such as attorney's fees, lost profits or late fees in Addition to the principal amount of the claim. Attach an Itemized statement of all interest and other charges.

3. Supporting Documents: Please Review the Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim, which was included with this Proof of Claim Form, for instructions of supporting documents to attach to your Proof of Claim Form (including for example, documents evidencing the amount and basis of your Claim). **DO NOT SEND ORIGINAL DOCUMENTS.** If the documents are not available, explain why. If the documents are voluminous, attach a summary.

4. Signature: Sign and print the name and title, if any, of the individual or person authorized to submit this claim (attach a copy of any power of attorney, death certificate or other authorizing documents as needed).

By signing your name below, you are certifying that the information contained in this Proof of Claim Form and any attached documentation is true and correct under penalty of perjury under the laws of the United States of America.

Signature: Shannon Westhead Name: Shannon Westhead Title (if any) _____

5. Dated: 02/27/2023 **YOU MUST DATE AND SIGN THIS FORM FOR THIS CLAIM TO BE VALID**

INFORMATION ON COMPLETING THE PROOF OF CLAIM FORM

- 1. Information about Claimant.** Complete this section giving the name, address, telephone number and email address of the individual or entity who is asserting a claim against a Par Funding Receivership Entity and the Receivership Estate, and any account or reference number associated with such debt or obligation. If the Claimant is an entity, please provide contact information and the title of the authorized representative. If a valid email address is included on this form, the Claims Agent will send email notification confirming receipt of the Proof of Claim.
- 2. Claim information.**
 - 2a.** Please indicate the basis of your claim in this section. If you believe you have one claim, you only need to submit one Proof of Claim Form. If you believe you have multiple claims, you should file a separate Proof of Claim Form for each such claim. Check only one box per claim. Attach additional explanations as necessary. Please refer to The Notice of Claims Bar Date and Procedures For Submitting a Proof of Claim for the definitions of a Claimant, Pre- Receivership Creditor Claim, Par Funding-Related Claim, Par Funding Receivership Entities, and any other capitalized terms not defined therein can be found in the documents available at: the Receiver's website (www.ParFundingReceivership.com). If you are a Claimant that pooled funds from individual investors for investment in CBSG (*i.e.*, an "Agent Fund"), you must fill out and attach an "Agent Fund Supplement to Proof of Claim Form (see Exhibit B), along with the other information described in Exhibit B.
 - 2b. 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.

You can also obtain the Investor Supplement to Proof of Claim Form and instructions from a link on the Receiver's website (www.ParFundingReceivership.com).
 - 2c. Administrative Claim.** Mark the applicable box if your claim is an Administrative Claim. Please refer to The Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim for the definition of an Administrative Claim, Administrative Claimant, must also designate the post- Receivership basis for the claim. Attach additional explanations as necessary.
 - 2d. Administrative Claim Amount.** Administrative Claimants must state the unpaid amount of the post- Receivership Claim.
 - 2e. Other liable parties.** Please identify all other parties you believe may be liable to you on the claim. Also, please provide any information regarding money recovered from such party(ies).
 - 2f. Pending legal action.** If you have commenced a legal action against any party you believe may be liable to you on the claim, please provide the details of said legal action here, including the Court and Case number. Please attach supporting documentation. Also, please provide any information regarding court judgments and money recovered.
 - 2g. Claim above principal amount.** Mark the applicable box if your claim amount includes interest or other charges, such as attorneys' fees, lost profits, or late fees in addition to the principal amount of your claim and attach an itemized statement of all such additional charges.
- 3. Supporting Documentation.** In addition to filling out the Proof of Claim Form, you must provide supporting documentation evidencing your claim. **Please Review the Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim** for instructions of the supporting documents which must be attached to your Proof of Claim Form, as applicable.
DO NOT SEND ORIGINAL DOCUMENTS.
If the documents are not available, explain why. If the documents are voluminous, attach a summary.
- 4. Signature is required.** Sign the Proof of Claim Form and indicate your name and title, as applicable.
- 5. Date.** Insert the date on which you completed and signed the Proof of Claim Form.
- 6. Submit Claim Form.** Submit a completed Proof of Claim Form, along with all supporting documentation:
By electronic submission on the claims portal, which is available on the Receiver's website (www.parfundingreceivership.com);
By mail to Par Funding Receivership Claims Processing Center, c/o Epiq Corporate Restructuring, LLC, P.O. Box 4421, Beaverton, OR 97076-4421; or
By courier service addressed to Par Funding Receivership Claims Processing Center, c/o Epiq Corporate Restructuring, LLC, 10300 SW Allen Blvd., Beaverton, OR 97005.

If you submit a Proof of Claim by courier service, you should retain evidence the Proof of Claim was delivered to the Claims Agent no later than the Claims Bar Date. If you submit a Proof of Claim by mail, it is recommended that you submit your Proof of Claim by certified or registered mail and retain evidence that the Proof of Claim was postmarked no later than the Claims Bar Date.
- 7. Acknowledgment of Receipt of Proof of Claim Form.** Proof of Claim Forms submitted with a valid email address will receive email notification confirming receipt by the Claims Agent of the Proof of Claim.

Exhibit A – Investor Supplement to Proof of Claim Form

If you are an investor, please provide a detailed accounting of all funds you invested with the entity against which you are asserting a claim, and all amounts you received from that entity.

Investor Name: Shannon Westhead

Entity Against Which You Are Asserting a Claim: ABFP MULTISTRATEGY INVESTMENT FUND LP

Amounts Invested:

<u>Date</u>	<u>Amount</u>	<u>Payor/Payee of Check/Wire</u>
<u>03/26/2019</u>	<u>\$ 50,000</u>	<u>ABFP MULTISTRATEGY INVESTMENT FUND LP</u>
_____	_____	_____
_____	_____	_____
Total Amount Invested:	<u>\$ 50,000</u>	

Amounts Received:

<u>Date</u>	<u>Amount</u>	<u>Return of Principal/ Interest/Other (Describe)</u>	<u>Payor/Payee of Check/Wire</u>
<u>7/18/2019</u>	<u>\$ 1,056.98</u>	<u>Interest</u>	<u>Shannon Westhead</u>
<u>11/22/2019</u>	<u>\$ 2,796.79</u>	<u>Interest</u>	<u>Shannon Westhead</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
Total Amounts Received:	<u>3,853.77</u>		

Net Investment: 46,146.23

(Calculate by Adding Total Amounts Received, and then Subtracting Total Amounts Received)


**ADDITIONAL INFORMATION
(ATTACH ADDITIONAL SHEETS AS NECESSARY)**


SHANNON WESTHEAD TRUST, INC.
ADMINISTRATIVE ACCOUNT

SHANNON WESTHEAD 05-16 191
 7 WELLINGTON CT 55-136/312
 MT LAUREL, NJ 08054 270

Date

Pay to the Order of \$

Dollars  Photo Safe Deposit™
Circle on back

 **TD Bank**
 America's Most Convenient Bank

For _____ MP

⑆03⑆ 20⑆ 360⑆ ⑆ 5683⑆ 019⑆

Member FDIC TD Bank, N.A.