

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Securities and Exchange Commission,
Plaintiff,

v.

Complete Business Solutions Group, Inc., et al.,
Defendants.

Case No. 20-cv-81205-RAR

**NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE LATE
CLAIM**

PLEASE TAKE NOTICE that Movants Michael Laude and Alan Laude respectfully move this Court for an Order permitting them to be added to the PAR Funding Receivership claims list and to file late claims based on lack of notice and equitable considerations.

Dated: April 9, 2026

Respectfully submitted,
Michael Laude (Pro Se)

AFFIDAVIT IN SUPPORT

1. I am Michael Laude, a Movant in this matter.
2. I submit this on behalf of myself and my father, Alan Laude.
3. We invested through AG Morgan under Vincent Camarda, who has pleaded guilty to securities fraud.
4. Approximately \$4,000,000 (Alan Laude) and \$630,000 (Michael Laude) were invested into PAR Funding.
5. These funds represented our life savings.
6. We were unaware of the Receivership claims process until January 2026.
7. We received no notice of any bar date or claims procedure.
8. We relied on a financial advisor who engaged in criminal conduct.
9. We acted promptly upon discovering the existence of the claims process.
10. We respectfully request equitable relief to file late claims.

MEMORANDUM OF LAW

I. The Court Has Broad Equitable Authority

Federal courts supervising receiverships possess broad equitable powers to ensure fairness. See *SEC v. Elliott*, 953 F.2d 1560 (11th Cir. 1992).

II. Late Claims May Be Allowed for Lack of Notice

Courts routinely permit late-filed claims where claimants lacked actual notice. See *Pioneer Inv. Servs. Co. v. Brunswick Assocs.*, 507 U.S. 380 (1993) (excusable neglect standard).

III. Equity Favors Inclusion of Defrauded Investors

Receivership courts aim to treat similarly situated victims fairly. See *SEC v. Forex Asset Mgmt. LLC*, 242 F.3d 325 (5th Cir. 2001).

Here, Movants were deprived of notice due to reliance on a fraudulent intermediary. Denying participation would result in unjust enrichment of other claimants and inequitable treatment of similarly situated victims.

WHEREFORE

Movants respectfully request that this Court grant leave to file late claims, add them to the PAR Funding Receivership claims list, and grant such other relief as is just and proper.

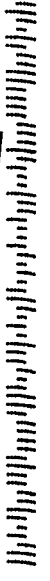
Michael Laude
41 St. Marks Pl.
Massapequa NY 11758

MID-ISLAND NY 117
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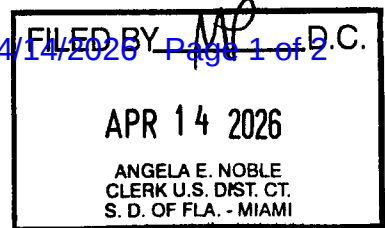
Clerk of the Court
Wilkie D. Ferguson, Jr. U.S. Courthouse
400 North Miami Ave
MIAMI, FL 33128

APR 14 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI



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Dear Judge Ruiz,

My name is Michael Laude, and I am writing to you on behalf of myself and my father, Alan Laude. We were investors with AG Morgan and Vincent Camarda, who recently pleaded guilty to securities fraud.

This fraud has resulted in the loss of our entire family savings. My father is at retirement age but can no longer afford to do so, and I am facing significant financial stress while raising two young daughters.

We are writing specifically regarding our investment in PAR Funding through the AGM Capital Fund I. My father invested \$3.9 million and I invested \$630,000. While I have spoken with Mr. Stumphauzer and Mr. Kolaya, who have been transparent about the situation, we were never notified of the process or the deadline to file a claim. We only became aware of these procedures in January 2026.

It is our understanding that the court reached out to Vincent Camarda and Anthony Zingarelli to file claims for their clients, which they failed to do. We believe that victims should not be penalized for the inaction of a convicted criminal. Had we been notified directly, we would have met all necessary deadlines.

We are seeking your assistance to be included in the claims process. It is devastating to learn that some investors are being made nearly whole while others, like us, may receive nothing simply due to a lack of notification. We are prepared to provide all necessary documentation, including our AG Morgan account summaries, to prove our investments in PAR Funding.

We ask that you consider our situation and allow us the opportunity to recoup our life savings alongside the other claimants. Thank you for your time and for considering this request. Please be the person that can provide us help because everyone else has provided us pain. We do not deserve these sleepless nights for being innocent people. This situation has been all we think about for 3 years. We need someone to do the right thing by us, I hope that someone is you.

Sincerely,

Michael Laude
41 Saint Marks Pl., Massapequa, NY 11758
516-906-7592

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Clerk of the Court
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