

FILED BY                      D.C.  
APR 14 2026  
ANGELA E. NOBLE  
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S. D. OF FLA. - MIAMI

**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, proceeding pro se, respectfully move this Court, before the Honorable Rodolfo A. Ruiz II, for an Order:

1. Permitting Movants to be added to the PAR Funding Receivership claims list;
2. Allowing Movants to submit claims notwithstanding any prior deadline; and
3. Granting such other and further relief as the Court deems just and proper.

This Motion is based upon the accompanying Affidavit in Support, the exhibits attached thereto, and all prior pleadings and proceedings in this matter.

Dated: April 9, 2026

Respectfully submitted,

Michael Laude (Pro Se)

41 Saint Marks Place

Massapequa, New York 11758

**AFFIDAVIT IN SUPPORT**



I, Michael Laude, being duly sworn, depose and state:

1. I am a Movant in this matter and submit this Affidavit in support of my Motion to be added to the claims list for the PAR Funding Receivership.
2. I also submit this Affidavit on behalf of my father, Alan Laude, who is likewise a victim investor.
3. My father and I invested substantial funds through AG Morgan under the direction of Vincent Camarda, who has since pleaded guilty to securities fraud.

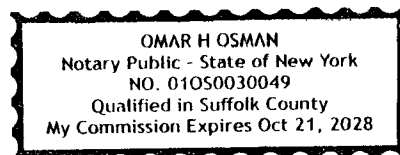
4. Through AG Morgan, approximately \$4,000,000 (Alan Laude) and \$630,000 (Michael Laude) were invested into what was known as the AGM Capital Fund I, which was tied to PAR Funding.
5. These investments represented our family’s life savings.
6. We were not aware of the existence of the PAR Funding Receivership claims process until approximately January 2026.
7. At no time prior were we provided notice of:
  - a. The claims process;
  - b. Any filing deadlines; or
  - c. Any requirement to submit claims individually.
8. We relied entirely on our financial advisor, who has since been proven to be engaged in fraudulent conduct.
9. Upon learning of the Receivership, I acted promptly to investigate and pursue recovery.
10. It is my understanding that no claim was submitted on our behalf.
11. Given the criminal conduct of the individuals involved, it would have been unreasonable to rely on them to act in our best interests.
12. We were therefore deprived of a fair opportunity to participate in the claims process.
13. Denying our participation would result in severe financial hardship and inequitable treatment compared to similarly situated investors.
14. We are prepared to provide full documentation substantiating our investments, including account summaries attached as exhibits.
15. This request is made in good faith and in the interest of justice.

Sworn to before me this 10 day of April, 2026

Notary Public

Michael Laude



MEMORANDUM OF LAW

**I. THE COURT HAS BROAD EQUITABLE AUTHORITY**

Federal courts supervising receiverships possess broad equitable powers to ensure fairness to victims. 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 or where excusable neglect exists. See Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. P’ship, 507 U.S. 380 (1993).

### **III. EQUITY FAVORS INCLUSION OF DEFRAUDED INVESTORS**

Receivership courts seek to treat similarly situated victims fairly and equitably. 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 inequitable treatment and undermine the purpose of the receivership.

### **WHEREFORE**

Movants respectfully request that this Court:

1. Grant leave to file late claims;
2. Add Michael Laude and Alan Laude to the PAR Funding Receivership claims list; and
3. Grant such other and further relief as the Court deems just and proper.

### **EXHIBITS**

Exhibit A – Account Summary of Michael Laude

Exhibit B – Account Summary of Alan Laude



**Alan & Debra Laude**

**Summary of Accounts: 10/26/2020**

Name of Account	Account Number	Start Date	Balance	Guaranteed Values/ Values at Call	Monthly Interest Payments	Monthly Income
Joint: TD Advisory - NQ	XXX7765		\$31,754.31	\$31,754.31		\$3,330.54
Alan: TD Advisory - IRA	XXX3073		\$8,702.14	\$13,489.41		
Alan: CamaPlan IRA Cash	Cash Accumulation		\$95,253.13	\$95,253.13		
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (1)	1/25/2019	\$2,211,000.00	\$2,211,000.00	\$25,795.00	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (2)	7/10/2019	\$54,000.00	\$54,000.00	\$630.00	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (3)	9/25/2019	\$56,850.00	\$56,850.00	\$663.25	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (4)	10/10/2019	\$25,695.00	\$25,695.00	\$299.78	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (5)	11/10/2019	\$27,000.00	\$27,000.00	\$315.00	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (6)	12/10/2019	\$29,000.00	\$29,000.00	\$338.33	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (7)	3/10/2019	\$97,000.00	\$97,000.00	\$1,131.67	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (8)	5/10/2019	\$51,750.00	\$51,750.00	\$603.75	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (9)	1/10/2020	\$28,500.00	\$28,500.00	\$332.50	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (10)	2/10/2020	\$30,000.00	\$30,000.00	\$350.00	
Alan: AGM Capital Fund I - CamaPlan IRA	XXX20-05 (11)	7/25/2020	\$126,200.00	\$126,200.00	\$1,472.33	
Joint: AGM Capital Fund I - NQ	#255	1/10/2019	\$495,000.00	\$495,000.00	\$5,775.00	
Joint: AGM Capital Fund I - NQ	#317	2/25/2019	\$198,000.00	\$198,000.00	\$2,310.00	
Joint: AGM Capital Fund I - NQ	#321	7/25/2020	\$127,000.00	\$127,000.00	\$1,481.67	
Alan: AGM Capital Fund I - NQ	#216	11/25/2019	\$25,250.00	\$25,250.00	\$294.58	
Alan: AGM Capital Fund I - NQ	#189	9/25/2019	\$29,700.00	\$29,700.00	\$346.50	
Alan: AGM Capital Fund I - NQ	#168	5/25/2019	\$32,525.00	\$32,525.00	\$379.46	
Alan: AGM Capital Fund I - NQ	#220	12/10/2019	\$102,000.00	\$102,000.00	\$1,190.00	
Alan: AGM Capital Fund I - NQ	#373	3/10/2020	\$116,000.00	\$116,000.00	\$1,353.33	
<b>Total</b>			<b>\$3,998,179.58</b>	<b>\$4,002,966.85</b>	<b>\$45,062.15</b>	<b>\$3,330.54</b>

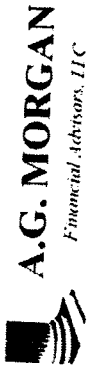
\*All monthly interest payments from all NQ AGM Capital Fund I's sent to XXX7765.

\*Monthly income is sent to Capital One.

\*Monthly interest payments from CamaPlan IRA agreements accumulate within the account.

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*All With PAC Funding*



**Michael Laude**

**Summary of Fund Interest: 9/10/2024**

Name of Account	Initial Start Date	Maturity Date	Balance	Monthly Interest	Total Interest in Arrears through September 10, 2024	Interest to Maturity	Total through Maturity
Michael: AGM Capital Fund I - NQ (1) - 14% - 12 month term	12/10/2019	12/17/2024	\$630,000.00	\$7,350.00	\$73,500.00	\$22,050.00	\$725,550.00
Michael: Windsor Capital Fund II - NQ (2) - 11% - 6 month term	1/25/2021	2/2/2025	\$45,000.00	\$412.50	\$5,712.50	\$2,062.50	\$50,775.00
Michael: Windsor Capital Fund II - NQ (3) - 11% - 6 month term	3/10/2021	3/17/2025	\$50,000.00	\$458.33	\$2,291.67	\$2,750.00	\$55,041.67
Michael: Windsor Capital Fund II - NQ (4) - 11% - 6 month term	11/10/2021	11/17/2024	\$30,000.00	\$275.00	\$1,375.00	\$550.00	\$31,925.00
Michael: Windsor Capital Fund II - NQ (5) - 11% - 6 month term	9/25/2022	10/2/2024	\$25,000.00	\$229.17	\$2,062.50	\$229.17	\$27,291.67
<b>Total</b>			<b>\$780,000.00</b>	<b>\$8,725.00</b>	<b>\$82,941.67</b>	<b>\$27,641.67</b>	<b>\$890,583.34</b>

*RA & FUNDING*

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*150,000*  
*112,000*

*11/20/2023*

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Massapequa NY 11753

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