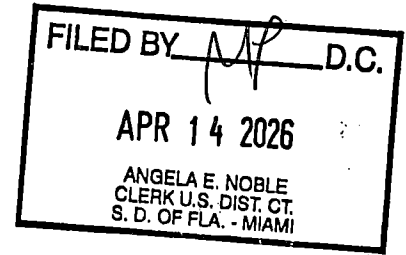


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



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



9589 0710 5270 1890 0705 21

Retail



33128

RDC 99

U.S. POSTAGE PAID
FCM LETTER
MASSAPEQUA PARK
NY 11762
APR 10, 2026

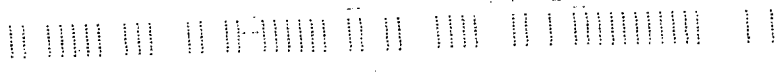
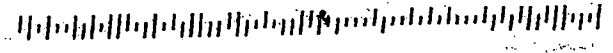
\$6.37

S2324E503071-08

REC'D BY _____ D.C.
APR 14 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

Clerk of the Court
Wilkie D. Ferguson, Jr. U.S. Courthouse
400 North Miami Avenue
Miami, FL 33128

33128377162071



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL