

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.

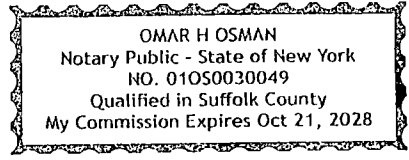
4. Through AG Morgan, approximately \$4,000,000 (Alan Laude) and \$630,000 (Michael Laude) were invested into what was known as the AGM Capital Fund I, which was tied to PAR Funding.
5. These investments represented our family's life savings.
6. We were not aware of the existence of the PAR Funding Receivership 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



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
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
Michael: Windsor Capital Fund II - NQ (2) - 11% - 6 month term	1/25/2021	2/2/2025	\$45,000.00	\$412.50	\$3,712.50
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
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
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
Total			\$780,000.00	\$8,725.00	\$82,941.67

PRR Funding



A.G. MORGAN
Financial Advisors, LLC

This summary statement is in addition to any or all statements you receive from your custodian and/or any non-proprietary companies. This summary was prepared manually by your advisor, A.G. Morgan Financial Advisors, LLC, to provide an estimated overview of your account values and its content may not be accurate. You must rely on the statements you receive directly from the investment companies. Market values do not include any fees/charges or incorporate any tax consequences that may be taken at the time of redemption or liquidation. Alternative investment products, including notes & debentures, involve a high degree of risk, often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be highly illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax information, are not subject to the same regulatory requirements as mutual funds and the underlying investments are not transparent and are known only to the investment manager. Alternative investment performance can be volatile. An investor could lose all or a substantial amount of his or her investment. There may be restrictions on transferring interests in any alternative investment. Illiquid Private Placement investment products traded herein are not FDIC insured or bank guaranteed and may lose value. Past performance is not indicative of future results. A.G. Morgan, and its employees do not provide any tax, accounting or legal advice. You should always consult with a qualified professional in those specific areas for your investment needs. Investment Advisory Services offered through A.G. Morgan Financial Advisors, LLC, a SEC Registered Investment Advisor. Sources used to prepare this summary were/are: Account values are shown as of: 9/10/2024.

40%

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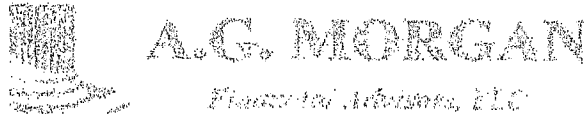
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Alan & Debra Laude
Summary of Accounts: 10/26/2020

Name of Account	Account Number	Start Date	Balance	Guaranteed Values/ Values at Call	Monthly Interest Payments
Joint: TD Advisory - NQ	XXX7765		\$31,754.31	\$31,754.31	
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
Total			\$3,998,179.58	\$4,002,966.85	\$45,062.15

- *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.



This summary statement is in addition to any or all statements you receive from your custodian and/or any non-proprietary companies. **This summary was prepared manually by your advisor A.G. Morgan Financial Advisors, LLC to provide an estimated overview of your account values and its content may not be accurate. You must rely on the statements you receive directly from the investment companies.** Market values do not include any fees/charges or incorporate any tax consequences that may be taken at the time of redemption or liquidation. Past performance is not indicative of future results. A.G. Morgan, and its employees do not provide any tax, accounting or legal advice. You should always consult with a qualified professional in those specific areas for your investment needs. Sources used to prepare this summary were/are: TD Ameritrade, AGM Capital Fund I, CamaPlan. Account values are shown as of: 10/23/2020

All

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,

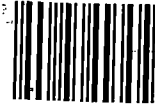
Michael Laude
41 Saint Marks Pl., Massapequa, NY 11758
516-906-7592

Michael Laude
41 St. Marks Pl.
Massapequa NY 11758



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Retail



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FCM LETTER
MASSAPEQUA P
NY 11762
APR 10, 2026

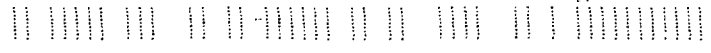
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REC'D BY _____ D.C.
APR 14 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

Clerk of the COURT
Wilkie D. Ferguson, Jr. U.S. Courthouse
400 NORTH MIAMI AVENUE
MIAMI, FL 33128

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