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

Judge Ruiz

FILED BY MP D.C.
MAY - 5 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

NOTICE OF MOTION AND MOTION FOR LEAVE- TO FILE LATE RECEIVERSHIP CLAIMS

Movant **Alan Laude**, appearing **pro se**, respectfully move this Court for an Order granting leave to file late claims in the **PAR Funding Receivership** and directing the Receiver to add Movant to the approved claims list.

This Motion is based on (i) lack of actual or constructive notice of the claims bar date, (ii) prompt action upon discovery of the claims process, and (iii) this Court's broad equitable authority to ensure fair treatment of defrauded investors.

This Motion is supported by the accompanying Affidavit and Memorandum of Law, and upon all pleadings and proceedings in this action.

AFFIDAVIT OF ALAN LAUDE IN SUPPORT

I, **Alan Laude**, hereby affirm under penalty of perjury as follows:

1. I am a Movant in this matter and submit this affidavit based on personal knowledge.
2. I submit this affidavit on behalf of myself, I invested **approximately $4,000,000**, into **PAR Funding**.
3. These investments were made through **AG Morgan Financial Advisors** and **Vincent Camarda**, who has since **pleaded guilty to securities fraud** arising from this scheme.

4. The invested funds represented the **life savings** of myself and my family.
5. I never received **any notice** of the PAR Funding Receivership claims procedure or bar date.
6. I was **unaware of the receivership or claims process until January 2026**.
7. Our lack of notice resulted from reliance on a financial advisor who engaged in **criminal misconduct** and concealed material facts.
8. Immediately upon discovering the existence of the claims process, we acted **promptly and diligently** to seek relief from this Court.
9. Denial of participation would cause **severe and irreparable financial prejudice** and result in inequitable treatment compared to similarly situated victims.

I affirm under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: April 25, 2026

/s/ Alan Laude
Alan Laude

MEMORANDUM OF LAW IN SUPPORT

I. THE COURT HAS BROAD EQUITABLE AUTHORITY OVER RECEIVERSHIP CLAIMS

Federal courts overseeing SEC receiverships possess **extraordinarily broad equitable powers** to fashion relief that ensures fairness and justice among defrauded investors. The Eleventh Circuit has expressly held that district courts have wide discretion to manage claims administration and distribution in receiverships. *SEC v. Elliott*, 953 F.2d 1560, 1566 (11th Cir. 1992). [case-law.vlex.com]

This authority includes the power to consider and allow late-filed claims where equity demands inclusion and where no undue prejudice results to the estate.

II. LATE CLAIMS MAY BE ALLOWED WHERE CLAIMANTS LACKED NOTICE

Due process requires that claimants receive **notice reasonably calculated** to apprise them of claims procedures and bar dates. *SEC v. Elliott*, 953 F.2d at 1566 (recognizing that fairness and adequate notice are fundamental in receivership proceedings). [case-law.vlex.com]

Where a claimant **lacks actual notice**, courts routinely permit late claims. The Supreme Court's excusable-neglect framework in *Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership*, 507 U.S. 380 (1993), is instructive and routinely applied in receivership contexts. [supreme.justia.com]

Under *Pioneer*, courts weigh:

- The danger of prejudice to the estate,
- The length of the delay and its impact on proceedings,
- The reason for the delay (including lack of notice), and
- Whether the movant acted in good faith.

Each factor favors Movants here.

III. MOVANTS SATISFY THE EXCUSABLE NEGLECT STANDARD

First, **no prejudice** will result from permitting Movants' claims because distributions have not yet been finalized and inclusion will merely place them among similarly situated victims.

Second, the delay was caused **solely by lack of notice**, compounded by reliance on an intermediary who committed criminal fraud—circumstances well beyond Movants' control.

Third, Movants acted **immediately upon discovery** of the receivership claims process, evidencing diligence and good faith.

Fourth, courts have consistently declined to penalize innocent investors for errors, omissions, or misconduct committed by financial advisors or intermediaries. *Pioneer*, 507 U.S. at 396–97 (clients should not automatically suffer for counsel's mistakes, particularly where notice was unclear or unavailable). [supreme.justia.com]

IV. EQUITY FAVORS INCLUSION OF ALL DEFRAUDED INVESTORS

A core purpose of SEC receiverships is the **equitable treatment of similarly situated victims**. Excluding Movants—who invested millions and lacked notice—would unjustly enrich other claimants and undermine parity in distribution.

Courts supervising SEC receiverships consistently emphasize fairness over rigid procedural forfeiture. See *SEC v. Forex Asset Mgmt. LLC*, 242 F.3d 325, 331 (5th Cir. 2001) (affirming trial courts' discretion to ensure equitable treatment of victims). Although from another circuit, this reasoning has been widely followed and is consistent with Eleventh Circuit principles. [casemine.com]

CONCLUSION

For the foregoing reasons, Movant **Alan Laude** respectfully request that this Court:

1. Grant leave to file late claims in the PAR Funding Receivership;
2. Direct the Receiver to add Movant to the approved claims list;
3. Grant such other and further relief as the Court deems just and proper;
4. And for the Court to make Pro rata distribution based on each investor's investment.

Alan Laude

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"Pro Se"

Certificate of Service

I, Alan Laude, certify that on April 25, 2026, I served this motion to Mr. Tim Kolaya via email.

Tim Kolaya

Stumphauzer Kolaya Nadler & Sloman, PLLC

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A.G. MORGAN
Financial Advisors, LLC

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	
Total			**$3,998,179.58**	**$4,002,966.85**	**$45,062.15**	**$3,330.54**

*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 With PAR Funding

Mr. & Mrs. Laude
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Massapequa, NY 11758

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

REC'D BY________D.C.
MAY - 6 2026
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