

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

SECURITIES AND EXCHANGE COMMISSION, §

§

Plaintiff, §

§

v. §

Civil Action No. 3:05-CV-1328(BD)

§

MEGAFUND CORPORATION, STANLEY A. §

**ECF**

LEITNER, SARDAUKAR HOLDINGS, IBC., §

**Referred to the U.S. Magistrate Judge**

BRADLEY C. STARK, CIG, LTD., and §

JAMES A. RUMPF, Individually and d/b/a §

CILAK INTERNATIONAL, §

§

Defendants, §

and §

§

PAMELA C. STARK, §

§

Relief Defendant. §

**RECEIVER’S MOTION TO DISALLOW/ADJUST “A” CLAIMS  
(MEGAFUND RECEIVERSHIP ESTATE)**

TO THE HONORABLE JEFF A. KAPLAN, UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling, the Receiver appointed in these proceedings (“Receiver”), and files this his Motion to Disallow/Adjust “A” Claims (Megafund Receivership Estate). In support of this motion, the Receiver would respectfully show the Court as follows:

1. On July 5, 2005, the Court appointed Michael J. Quilling to serve as Receiver in these proceedings. On July 19, 2005, the Court issued an Amended Order Appointing Receiver, pursuant to which James Rumpf individually and d/b/a CILAK International were included within the Receivership.

2. On August 11, 2005, the Receiver filed a Motion to Designate Receivership Estates,

which the Court approved by Order dated August 12, 2005. As a result of the Order, the Megafund Corporation/CIG, Ltd. receivership estate was designated.

3. On August 16, 2005, the Receiver filed a Motion to Establish Claim Procedure Plan and to Approve Claim Form, which motion was granted by Order dated August 19, 2005. Pursuant to paragraph 8 of the Order, the Receiver requests that the Court disallow or adjust each of the following claims for the reasons set forth below:

**Arsilia I. Croft; Claim No. A-0053**

The Claimant asserts that she invested \$30,000 and received returns of \$12,000, giving her a net claim of \$18,000. However, the Claimant has provided no proof of the investment to the Receiver and the bank records available to the Receiver do not reflect such an investment. In addition, the bank records that are available to the Receiver show that the Claimant received returns of \$33,000. Accordingly, even if the Claimant had invested \$30,000, the Claimant has been repaid more than the amount invested and, therefore, has no claim. This claim should be disallowed.

**Paul J. Samuels; Claim No. A-0062**

The Claimant has submitted a claim of \$100,000 and reflects no returns, giving a net claim of \$100,000. The Receiver objects to the claim because the Claimant has not provided any evidence of an investment other than a letter from Jim Rumpf, which says that \$100,000 will be entered into CIG in early 2003. Apparently, the funds were given to an entity operated at that time by Rumpf called HMS. The Receiver has no records that indicate that HMS ever transferred any funds to the CIG bank accounts. Accordingly, this claim should be disallowed.

**Levoy L. Dewey; Claim No. A-0095**

The Claimant has submitted a claim reflecting a \$10,000 investment with returns of \$2,000, leaving a net claim of \$8,000. The Receiver believes this claim needs to be adjusted because the bank records show that the Claimant received \$4,000 in payments and, therefore, the net claim should be \$6,000.

**Levoy L. Dewey; Claim No. A-0096**

The Claimant has submitted a claim reflecting a \$10,000 investment with returns of \$1,000, leaving a net claim of \$9,000. The Receiver believes this claim needs to be adjusted because the bank records show that the Claimant received \$4,000 in payments and, therefore, the net claim should be \$7,000.

**Levoy L. Dewey; Claim No. A-0097**

The Claimant has filed a claim reflecting a \$10,000 investment with no returns, leaving a net claim of \$10,000. The Receiver believes this claim needs to be adjusted because the bank records show that the Claimant received \$3,400 in payments and, therefore, the net claim should be \$6,600.

**Edward (Ned) J. Wolf, Jr.; Claim No. A-0133**

The Claimant has submitted a claim reflecting a \$70,000 investment with no returns, leaving a net claim of \$70,000. The Receiver objects to this claim because the funds were apparently given to HMS, a prior entity operated by Jim Rumpf. No evidence is provided, nor can the Receiver find any records that would demonstrate, that HMS ever forwarded any funds to the CIG bank accounts. Accordingly, this claim should be disallowed.

**Patrick D. Griffing; Claim No. A-0250**

The Claimant has submitted a claim showing an investment of \$70,000 with returns of \$38,000, leaving a net claim of \$32,000. The Receiver objects to this claim because the Claimant contends it was an all-cash investment. The Receiver can only verify an investment of \$10,000 in cash, which the Receiver seized out of Jim Rumpf's car on the date the receivership order was entered. Other than the money seized, there are no bank records available to the Receiver that reflect deposits of the other \$60,000 of cash. Accordingly, this claim should be disallowed.

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201-4240  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By:     /s/ Michael J. Quilling    

Michael J. Quilling  
Texas State Bar No. 16432300  
Email: [mquilling@qsclpc.com](mailto:mquilling@qsclpc.com)  
Brent J. Rodine  
Texas State Bar No. 24048770  
Email: [brodine@qsclpc.com](mailto:brodine@qsclpc.com)

ATTORNEYS FOR RECEIVER

**CERTIFICATE OF SERVICE**

This is to certify that on November 10, 2006, a true a correct copy of this motion has been served on each of the claimants that are the subject of this Motion by U.S. mail, with first-class postage pre-paid, at these addresses:

Arsilia I. Croft  
612 Durango Circle S.  
Irving, TX 75062

Paul J. Samuels  
92 Flat Top Mountain Road  
Fairview, NC 28730

Levoy Dewey  
Dewey Family Benevolence Fund  
3996 Lawing Drive  
Nashville, TN 37207

Edward J. Wolf, Jr.  
Essene Healing Society  
P.O. Box 1575  
Bothell, WA 98041

Patrick D. Griffing  
Ester's House International  
1533 Turning Leaf Lane  
Garland, TX 75040

/s/ Michael J. Quilling

This Motion will also be posted on the Receiver's website, [www.secreceiver.com](http://www.secreceiver.com) after filing.