

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-L

MEGAFUND CORPORATION, STANLEY A. §  
LEITNER, SARDAUKAR HOLDINGS, IBC., §  
and 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 OBJECTION TO CLAIM**  
**(Megafund Receivership Estate)**

TO THE HONORABLE JEFF KAPLAN, UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling ("Receiver") and files this his Objection to Claim and in support of such would 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 additional parties were added to 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 the following claim for the reasons set forth below.

**Jan Leitner - Claim Number A-00349**

The claimant asserts that she invested \$40,000.00 with Megafund and has presented copies of checks for that amount. The claimant estimates that she received approximately \$11,000.00 in return and, therefore, estimates that her claim is \$29,000.00. The claimant is (or maybe was) the wife of Stan Leitner, the mastermind of the Megafund fraud who was recently convicted for his actions in connection with the investment scam. The claimant has previously written the Court regarding her claim and, as requested by the Court, the Receiver has responded to the claimant by letter dated August 29, 2007, a copy of which is attached as Exhibit 1 and incorporated herein by reference. As set forth in the letter, the records of the receivership reflect that the claimant received at least \$55,000.00 from the estate and was actively employed in the scam's operations in Addison. Finally, the attached letter reflects the fraud which the claimant and Mr. Leitner visited upon a federally insured financial institution. Such inequitable conduct mandates that the Court deny the claim or, in the alternative, deny it on the basis that the claimant was paid more than she invested. This claim should be disallowed.

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.  
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By: /s/ Michael J. Quilling

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ATTORNEYS FOR RECEIVER

### **CERTIFICATE OF SERVICE**

This is to certify that on the 14th day of March, 2008, a true and correct copy of the above and foregoing motion was sent via first class mail, with full and proper postage prepaid thereon, to:

Jan Leitner  
1919 Dina  
Arnold, Missouri 63010

/s/ Michael J. Quilling

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