

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.,	§	
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 UNOPPOSED MOTION TO SELL VEHICLE  
FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES (MASERATI)**

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

COMES NOW, Michael J. Quilling (“Receiver”), and files this his Motion to Sell Vehicle Free and Clear of All Liens, Claims and Encumbrances, and in support of such would respectfully show unto the Court as follows:

1. On July 1, 2005, the Securities and Exchange Commission (“SEC”) initiated these proceedings and in connection therewith sought the appointment of a receiver as to the defendants and relief defendant. By order dated July 5, 2005, Michael J. Quilling was appointed as the receiver and has continued to serve in that capacity.

2. One of the assets of the receivership estate is a 2005 Maserati Quattroporte, VIN #ZAMCE39A250016814 (the “Maserati”), which is titled in the name of Administrative Specialists. The Receiver now possesses the Maserati.

3. Since taking possession of the vehicle, the Receiver has been actively marketing the Maserati for sale. As a result of his efforts, the Receiver has received an offer from Angelo D. Scropo to purchase the vehicle for \$71,000.00, subject to this Court's final approval. The Receiver believes that the purchase price represents the fair market value of the Maserati, and that a sale for this amount is in the receivership estate's best interest.

4. The Maserati is still relatively new and, accordingly, the fair market value will likely decline quickly. The vehicle needs some minor repair and is missing some items, such as the spare tire. The purchaser will likely need to spend several thousand dollars to address these issues. The vehicle is not a mass-produced brand (*i.e.*, Ford or General Motors) and there is not an active resale market. In addition, of the national valuation guides, such as Kelley Blue Book, the Receiver consulted, none report any prices for the vehicle. However, one of the bids that the Receiver obtained was from a local Maserati dealership for \$66,000.00. This likely represents the wholesale value of the vehicle. Several individuals expressed an interest in the vehicle and were asked to submit their best bids. The two highest bidders then participated in an auction, whereby Mr. Scropo was the highest bidder with an offer of \$71,000.00.

5. Accordingly, the Receiver requests that this Court authorize him to sell the Maserati, free and clear of all liens, claims and encumbrances, to Angelo D. Scropo. To the Receiver's knowledge, there are no known liens or encumbrances against the vehicle.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that this Court enter an Order authorizing him to sell the Maserati to Angelo D. Scropo and consummate a contract for sale consistent with the foregoing, and for such other and further relief, general or special, at law or in equity, to which the Receiver may show himself justly entitled.

