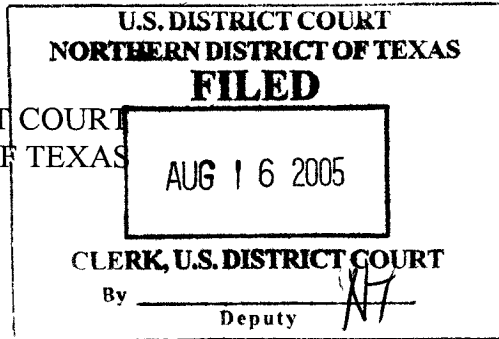


h w/o
ORIGINAL

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



SECURITIES AND EXCHANGE COMMISSION, §

Plaintiff, §

v. §

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. §

Civil Action No. 3:05-CV-1328-L

**RECEIVER'S MOTION TO ESTABLISH CLAIM PROCEDURE PLAN
AND TO APPROVE CLAIM FORM**

TO THE HONORABLE SAM A. LINDSAY, UNITED STATES DISTRICT JUDGE:

COMES NOW, Michael J. Quilling, ("Receiver"), the Receiver appointed by the Court in these proceedings and files this his Motion to Establish Claim Procedure Plan and to Approve Claim Form 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 sought the appointment of a receiver. On July 5, 2005, the Court issued its Order Appointing Receiver pursuant to which Michael J. Quilling was appointed as receiver and he has continued to function in that capacity since that time.

2. Given the currently known information regarding the operations of the entities involved in this receivership, the Receiver suggests that the following procedures be implemented as a claims procedure plan:

- An Official Claim Form in the format of Exhibit “A” attached hereto will be sent to any person believed to be an investor in any of the investment programs offered by the various defendants;
- An Official Claim Form in the format of Exhibit “B” attached hereto will be sent to any potential non-investor claimant (*i.e.* trade vendors) at such time as those potential claimants are identified by the Receiver;
- A cover letter in the format of Exhibit “C” attached hereto will be sent along with each claim form;
- The Claim Form must be returned to the Receiver within 60 days after the Claim Form is mailed to the potential claimant. Failure to timely return a Claim Form may be grounds to disallow the claim.¹
- As a Claim Form is received, it will be assigned a sequential claim number to be used to identify the claim during further proceedings before this Court;
- As a Claim Form is received, a post card in the format of Exhibit “D” attached hereto will be sent to each claimant.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that upon final consideration of this motion that the Court enter an order consistent with the foregoing requested

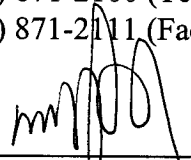
¹ The Receiver does not intend to use such a deadline as a hard and fast rule to penalize claimants but rather only as a means to prompt a timely return of the completed form. The Receiver intends to make exceptions to the deadline as circumstances dictate.

relief and for such other and further relief, general or special, at law or in equity, to which the Receiver may show himself justly entitled.

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:

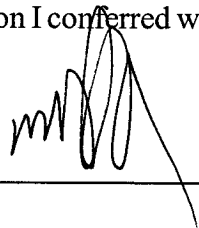


Michael J. Quilling
Texas State Bar No. 16432300

ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

I hereby certify that prior to filing this motion I conferred with all counsel of record and none of them oppose the motion.



CERTIFICATE OF SERVICE

This is certify that on the 16th day of August, 2005, 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:

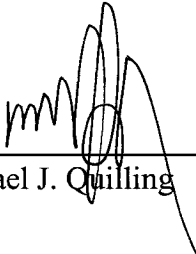
Stephen J. Korotash
Securities and Exchange Commission
801 Cherry Street, Suite 1900
Fort Worth, Texas 76102

Scott Baker
10830 North Central Expressway
Suite 475, B4
Dallas, Texas 75231

Jeffrey Henderson
Henderson & Lyman
175 West Jackson Boulevard, Suite 240
Chicago, Illinois 60604

CIG, Ltd.
c/o James Rumpf
1802 Pleasant Valley Drive, Suite 100-149
Garland, Texas 75040

James Rumpf, Individually and d/b/a
Cilak International
1802 Pleasant Valley Drive, Suite 100-149
Garland, Texas 75040



Michael J. Quilling

Exhibit “A”

OFFICIAL COURT-APPROVED CLAIM FORM		SUBMIT FORM TO:	Internal Use Only:
SEC v Megafund Corporation, Stanley A. Leitner, Sardaukar Holdings, IBC., Bradley C. Stark, CIG Ltd., James A. Rumpf and Cilak International, Defendants and Pamela C. Stark, Relief Defendant. Civil Action No. 3:05-CV-1328-L (N.D. Tex.)		Michael J. Quilling, Receiver c/o Stephen M. Tomasky Quilling, Selander, et al. 2001 Bryan Street, Ste 1800 Dallas, TX 75201	Claim No: MFA- _____ Date Received: _____
NAME: (First) _____ (M.I.) _____ (Last) _____			
JOINT INVESTOR: (First) _____ (M.I.) _____ (Last) _____			
COMPANY OR ENTITY NAME: (if applicable) _____	SSN# - PRIMARY _____	SSN# - JOINT or TAX ID# _____	
MAILING ADDRESS: _____			
CITY: _____	STATE: _____	ZIP CODE: _____	
HOME PHONE: _____	WORK PHONE: _____	CELL PHONE: _____	
E-MAIL ADDRESS: _____		FAX NUMBER: _____	
The individual or company I invested with is: _____			
The total amount of my investment is:		\$ _____	(1)
This includes monies you paid by cash, check or wire transfer. Do not include unearned interest or any rollover/reinvestment amounts. If you had multiple investments, make copies of this form and submit a separate claim for each investment.			
The total amount I received back from my investment as either a return of principal or as an interest payment is:		\$ _____	(2)
The total amount of any other monies or benefits I received is:		\$ _____	(3)
I.E. Commission fees, referral fees, etc. Estimate value for non-monetary returns such as gifts or favors.			
My NET claim on this investment is:		\$ _____	(4)
Compute by taking the amount invested(1), subtract interest/principal payments received (2), & subtract other payments (3). This will be your net claim amount (4).			
Supporting Documents: Attach copies of supporting documents, such as canceled checks (front and back), carbon checks, wire instructions, money orders, bank statements, etc. These documents must be sufficient to show the source of the deposited funds, the amounts and dates funds were deposited, and the amounts and dates of all returns sent to you. DO NOT SEND ORIGINAL DOCUMENTS. If documents are not available, explain on separate sheet of paper. SEE REVERSE for further instructions.			
Verification of Claims: All claims submitted are subject to verification by the Receiver and approval by the Court. It is important to provide complete and accurate information to facilitate this effort. Claimants may be asked to supply additional information to complete this process. Claims will not be submitted to the court for approval until they have been verified.			
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Sign and print the name and title, if any, of the person authorized to file this claim (attach copy of power of attorney, if any):			
_____ (Sign name)		Executed on (date) _____	
_____ (Print or type name)			
PENALTY FOR PRESENTING FRAUDULENT CLAIM: FINE OF UP TO \$500,000 OR IMPRISONMENT FOR UP TO 5 YEARS OR BOTH. 18 U.S.C. §§ 152 AND 3571			

INSTRUCTIONS FOR CLAIM FORM

IMPORTANT:

Please provide copies of these documents along with this claim form:
(Failure to supply any of these documents may result in a delay in processing your claim and/or in the disallowance of your claim.)

- Copy of your investment contract or other documents you signed when you invested.
- Proof of your investment amount. (Copy of your checks, cashier checks, money orders, wire transfers, bank statements and/or receipts.)
- Proof of any return of monies you received. (Copy of checks, cashier checks, money orders, wire transfers, bank statements and/or receipts.)
- If you invested more than once, you need to make a copy of this Claim Form and submit a separate completed claim form for each investment.
- If you and your spouse made a joint investment, only one of you need to complete and sign this Claim Form.

ALSO:

- **DO NOT SEND** your completed claim form to the Court, this will only delay the claim process.
- We strongly recommend that you return your completed claim form via certified mail.
- Once your claim form is received, a postcard will be sent to you confirming receipt of your claim. If you **DO NOT** receive a postcard within 30 days of submitting your claim, it is **YOUR RESPONSIBILITY** to contact us immediately to correct the problem. It is strongly recommended that you keep a copy of the completed claim form for your records.
- **IT IS YOUR RESPONSIBILITY** to advise us of any address or phone changes.
- For more information or to monitor the status of this receivership case, please refer to the Receiver's website at www.secreceiver.com.
- If you are aware of any other investors please tell them to contact us so that we can send them a claim form if we have not done so already.

Exhibit “B”

OFFICIAL COURT-APPROVED CLAIM FORM SEC v Megafund Corporation, Stanley A. Leitner, Sardaukar Holdings, IBC., Bradley C. Stark, CIG Ltd., James A. Rumpf and Cilak International, Defendants and Pamela C. Stark, Relief Defendant. Civil Action No. 3:05-CV-1328-L (N.D. Tex.)		SUBMIT FORM TO: Michael J. Quilling, Receiver c/o Stephen M. Tomasky Quilling, Selander, et al. 2001 Bryan Street, Ste 1800 Dallas, TX 75201	Internal Use Only: Claim No: MFB- _____ Date Received: _____
NAME OF CREDITOR/COMPANY _____			
NAME OF REPRESENTATIVE (if different) _____			
MAILING ADDRESS: _____			
CITY: _____		STATE: _____	ZIP CODE: _____
TAX ID OR SSN: _____	BUSINESS PHONE: _____		FAX NUMBER: _____
E-MAIL ADDRESS: _____		OTHER NUMBER: _____	
DETAIL OF DEBT (If you claim more than one debt you need to submit this form for each debt): BASIS OF CLAIM: Goods sold <input type="checkbox"/> Equipment sold/leased <input type="checkbox"/> Taxes <input type="checkbox"/> Services performed <input type="checkbox"/> Wages, salary or other compensation <input type="checkbox"/> Other <input type="checkbox"/> Specify: _____ What is the name of the entity which owes the claim: _____ Date debt was incurred/period of time for which you are owed: _____ Amount you claim is owed: \$ _____ (Attach supporting documents and provide a detailed explanation of how you calculate your claim. Be sure to state all credits.) Was anything assigned or pledged to you as collateral for the debt you claim? Yes <input type="checkbox"/> No <input type="checkbox"/> If YES, what was it: _____			
Did you file a lawsuit to collect the debt claimed? Yes <input type="checkbox"/> No <input type="checkbox"/> If YES, where and which court: _____ Attorney's name, address and phone number: _____ Did you obtain a court judgment? Yes <input type="checkbox"/> No <input type="checkbox"/> . If YES, what date: _____			
Supporting Documents: Attach copies of supporting documents, invoices, contracts, leases or other agreements which support your claim. DO NOT SEND ORIGINAL DOCUMENTS. If documents are not available, explain on separate sheet of paper. SEE REVERSE for further instructions.			
Verification of Claims: All claims submitted are subject to verification by the Receiver and approval by the Court. It is important to provide complete and accurate information to facilitate this effort. Claimants may be asked to supply additional information to complete this process. Claims will not be submitted to the Court for approval until they have been verified.			
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Sign and print the name and title, if any, of the person authorized to file this claim (attach copy of power of attorney, if any):			
_____		Executed on (date) _____	
(Sign name)			

(Print or type name)			
PENALTY FOR PRESENTING FRAUDULENT CLAIM: FINE OF UP TO \$500,000 OR IMPRISONMENT FOR UP TO 5 YEARS OR BOTH. 18 U.S.C. §§ 152 AND 3571			

INSTRUCTIONS FOR CLAIM FORM

IMPORTANT: Please provide copies of these documents along with this claim form:
(Failure to supply any of these documents may result in a delay in processing your claim and/or in the disallowance of your claim.)

- Copy of all contracts, invoices, leases or other agreements which support your claim.
- Be sure to provide a detailed explanation as to how you calculate the amount of your claim.

ALSO:

- **DO NOT SEND** your completed claim form to the Court, this will only delay the claim process.
- We strongly recommend that you return your completed claim form via certified mail.
- Once your claim form is received, a postcard will be sent to you confirming receipt of your claim. If you **DO NOT** receive a postcard within 30 days of submitting your claim, it is **YOUR RESPONSIBILITY** to contact us immediately to correct the problem. It is strongly recommended that you keep a copy of the completed claim form for your records.
- **IT IS YOUR RESPONSIBILITY** to advise us of any address or phone changes.
- For more information or to monitor the status of this receivership case, please refer to the Receiver's website at www.secreceiver.com.

Exhibit “C”

MICHAEL J. QUILLING, RECEIVER
c/o Quilling Selander Cummiskey & Lownds, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201

Re: *Securities and Exchange Commission v. Megafund Corporation, Stanley A. Leitner, Sardaukar Holdings, IBC., Bradley C. Stark, CIG, Ltd., James A. Rumpf and Cilak International, Defendants and Pamela C. Stark, Relief Defendant;*
Civil Action No. 3:05-CV-1328-L (N.D. Tex.)

Dear Potential Claimant:

As you may be aware, I am the Receiver appointed by the United States District Court for the Northern District of Texas, Dallas Division, as to the entities and individuals listed above. Records which I have reviewed indicate that you may have a claim against one of more of the entities or individuals for whom I act as Receiver. If you believe you have a claim of any nature whatsoever against any of them, you need to carefully read this letter and the enclosure.

Enclosed with this letter is an Official Court-Approved Claim Form which you need to complete and return. As indicated in the Claim Form, when you complete and return the form it is important that you provide copies of any documents which you have relating to your claim. It is strongly recommended that you send the completed Claim Form via certified mail. Be sure to keep a copy of the completed form for your records. The enclosed Claim Form was approved by the Court on _____. It is the **ONLY** Claim Form which will be considered in determining the amount of your claim. Accordingly, if you want your claim considered and verified, you **MUST** complete the enclosed form even if you have previously sent your information to me. **DO NOT SEND THE COMPLETED FORM TO THE COURT! SEND IT ONLY TO ME AT THE ADDRESS SET FORTH ABOVE.**

At the time the Court approved the enclosed Claim Form, the Court also ordered that you must complete and return the Claim Form within 60 days after it was mailed to you. Failure to return the Claim Form by the deadline may result in consideration of your claim being delayed and/or your claim being disallowed. **BE SURE TO COMPLY WITH THE DEADLINE.**

I believe the Claim Form is self-explanatory, but if you have questions, you may call the Claims Administrator assigned to this case, Steve Tomasky at (214) 880-1812. Because of the number of people involved, it may take several days for him to return your call. For those of you who have access to the internet you can also contact Steve Tomasky at stomasky@qsclpc.com. When your completed Claim Form is received, you will be sent a postcard acknowledging receipt of your Claim Form. If you do not receive a post card within thirty (30) days after you send your completed Claim Form please contact Steve Tomasky. After your completed Claim Form has been reviewed, you will be contacted if there is a problem with your claim. There is no need for you to contact us, we will contact you. Repeated phone inquiries by you will only delay and add to the cost of the process. If you do need to contact us, make sure your call relates to the completion of the Claim Form and **ONLY** completion of the Claim Form. If you are calling about the status of the case

Page Two

or anything which does not relate to the completion of the Claim Form, those calls will not be immediately returned.

For those of you who do not already know, you can monitor the progress of the receivership at my website: www.secreceiver.com.

Very truly yours,

/s/ Michael J. Quilling

MJQ/lms
Enclosure

Exhibit “D”

**SEC v. Megafund Corporation, Stanley A. Leitner, Sardaukar Holdings,
IBC., Bradley C. Stark, CIG, Ltd., James A. Rumpf and Cilak
International, Defendants and Pamela C. Stark, Relief Defendant;
Civil Action No. 3:05-CV-1328-L (N. D. of Texas)
Claim Form Confirmation**

****PLEASE READ****

Your claim has been received by the Receiver, Michael J. Quilling:

Your CLAIM NUMBER is: MFA-

Please refer to this claim number in all future correspondence.

You may monitor the progress of this case at:

www.secreceiver.com

Link to: "Megafund"

Please Note: It is your responsibility to notify us of any change in address or telephone number!

Michael J. Quilling, Receiver
2001 Bryan St., Suite 1800
Dallas, Texas 75201

PLACE
POSTAGE
HERE