OPEN MEETING ITEM
3/15/12

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COMMISSIONERS
GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

ERNEST G. JOHNSON
EXECUTIVE DIRECTOR

ORIGINAL

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SECURITIES DIVISION
1200 West Washington, Third Floor
Phoenix, AZ 85007
TELEPHONE: (602) 542-4242
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E-Mail: securitiesdiv@azcc.gov

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

MEMORANDUM

Arizona Corporation Commission
DOCKETED
MAR - 6 2012
DOCKETED BY

TO: Gary Pierce, Chairman
Bob Stump
Sandra D. Kennedy
Paul Newman
Brenda Burns

FROM: Matthew J. Neubert
Director of Securities

DATE: February 28, 2012

RE: Amended Proposed Order to Cease and Desist, for Restitution, and for Administrative Penalty regarding Comprehensive Cash Flow Funding, Inc., Webuyhomesinaz, LLC, My Bargain Gift Bag, LLC fka Brooklyn Boys Ventures, LLC and Loan Mod Shrink, LLC fka Escalade Ventures, LLC, Docket No. S-20826A-11-0455

CC: Ernest G. Johnson, Executive Director

Please find attached an amended proposed Order to Cease and Desist, for Restitution, and for Administrative Penalty ("Order") regarding Comprehensive Cash Flow Funding, Inc., Webuyhomesinaz, LLC, My Bargain Gift Bag, LLC fka Brooklyn Boys Ventures, LLC and Loan Mod Shrink, LLC fka Escalade Ventures, LLC ("Respondents"). The Order requires the Respondents to cease and desist from violating the Securities Act, pay restitution to investors in the principal amount of $1,053,122.66, plus interest from the date of investment, and pay an administrative penalty in the amount of $150,000. On December 21, 2011, a copy of the Notice was personally served on the statutory agent for the Respondents. Respondents have failed to request a hearing and answer the allegations in the notice within the prescribed time limits.

Between September 2004, and August 2009, Respondents operated a real estate investment business that purchased Arizona real estate intending to renovate the property. Respondents raised money from investors to fund the purchase of the real estate and the renovation costs. Once the renovated property was sold, the investors were to receive the return of their principal and the promised return.

The Order finds that Respondents violated A.R.S. §§44-1841 and 44-1842 by selling unregistered securities in the form of notes and investment contracts while being unlicensed. In addition, the Order finds that Respondents violated A.R.S. §44-1991 because there were untrue statements or misleading omissions of material fact. The Division believes that the Order is appropriate to protect the public welfare.

Originator: Wendy Coy

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

In the matter of: ARTHUR FRIED, an unmarried man, COMPREHENSIVE CASH FLOW FUNDING, INC., a dissolved Arizona corporation, WEBUYHOMESINAZ, LLC, an Arizona limited liability company, MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC, an Arizona limited liability company, and LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC, an Arizona limited liability company, Respondents.	DOCKET NO. S-20826A-11-0455 DECISION NO. _____ **ORDER TO CEASE AND DESIST, ORDER FOR RESTITUTION AND ORDER FOR ADMINISTRATIVE PENALTIES** **RE: COMPREHENSIVE CASH FLOW FUNDING, INC., WEBUYHOMESINAZ, LLC, MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC AND LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC**

On December 20, 2011, the Securities Division ("Division") of the Arizona Corporation Commission ("Commission") filed a Notice of Opportunity for Hearing regarding a Proposed Order to Cease and Desist, For Restitution, For Administrative Penalties and Order for Other Affirmative Action ("Notice") against ARTHUR FRIED ("Fried"), COMPREHENSIVE CASH FLOW FUNDING, INC. ("COMPREHENSIVE"), WEBUYHOMESINAZ, LLC ("WEBUYHOMESINAZ"), MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC ("BROOKLYN BOYS") and LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC ("ESCALADE").

On December 21, 2011, copies of the Notice were personally served on the statutory agent for COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE. COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE failed to request an administrative hearing within 10 days after receipt of the Notice, pursuant to A.R.S.§44-1972 and A.A.C. Rule R14-4-306. COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE have failed to file an Answer within 30 days of service of the Notice, pursuant to A.A.C. Rule R14-4-305.

I.

FINDINGS OF FACT

1. COMPREHENSIVE CASH FLOW FUNDING, INC. ("COMPREHENSIVE") was, from July 25, 2003, through January 5, 2010, an Arizona corporation. On January 5, 2010, COMPREHENSIVE was administratively dissolved by the Commission for failure to file an annual report. Fried was the president and director of COMPREHENSIVE.

2. WEBUYHOMESINAZ, LLC ("WEBUYHOMESINAZ") was organized in Arizona on December 14, 2004. At the time it was organized, Fried was identified as the manager and a member of WEBUYHOMESINAZ. On July 1, 2005, COMPREHENSIVE replaced Fried as the manager and member of WEBUYHOMESINAZ. On May 28, 2009, COMPREHENSIVE was removed as member and manager and AF Business Ventures, LLC[1] became the manager and a member of WEBUYHOMESINAZ.

3. MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC, ("BROOKLYN BOYS") was organized in Arizona on August 17, 2005, as an Arizona limited liability company. At the time it was organized, COMPREHENSIVE was identified as the manager and a member of BROOKLYN BOYS. On May 28, 2009, BROOKLYN BOYS filed Articles of Amendment with the Commission changing its name to MY BARGAIN GIFT BAG,

[1] AF Business Ventures, LLC was organized as an Arizona limited liability company on May 21, 2009. FRIED is the sole manager and member of AF Business Ventures, LLC.

LLC. and substituting AF Business Ventures, LLC for COMPREHENSIVE, as manager and a member of MY BARGAIN GIFT BAG, LLC.

4. LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC, ("ESCALADE") was, since August 22, 2005, an Arizona limited liability company whose manager and member was COMPREHENSIVE. On January 19, 2010, ESCALADE filed Articles of Amendment with the Commission changing its name to LOAN MOD SHRINK, LLC. At the same time, WEBUYHOMESINAZ was substituted for COMPREHENSIVE as manager and a member.

5. COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS, and ESCALADE may be referred to collectively as "Respondents."

6. Between September 2004, and August 2009, Fried, individually and through COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE, operated a real estate investment business that purchased Arizona real estate intending to renovate the property. Respondents raised money from investors to fund the purchase of the real estate and the renovation costs. Once the renovated property was sold, the investors were to receive the return of their principal and the promised return.

7. Fried ultimately controlled COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE (the "entities"). All business decisions for the named entities were made by Fried. Fried controlled the bank accounts for all the named entities. The investors had no control over the entities or the bank accounts.

8. Fried, through WEBUYHOMESINAZ, sought investors through various sources including advertisements in newspapers, members of Fried's congregation, websites and real estate investment clubs.

9. From about September 2004, through about February 2005, Fried and WEBUYHOMESINAZ sought investors through the placement of advertisements in the *Jewish News of Greater Phoenix.* The advertisements stated:

> **Do You Have An IRA Or Any Other Investment Capital That You Are Not Getting A Guaranteed High-Yield Rate Of Return On Safely?** We buy homes in Arizona. We borrow funds from private individuals to purchase and/or rehab these homes. Your money is secured by a first position lien, and we pay a guaranteed high-yield interest rate plus 3 months interest when we pay your loan off early. ***Investment partnerships are also available.*** **Did you know that you can use your IRA to invest in real estate?** All transactions are closed by professionals, with title and property insurance, appraisals and all other proper documentation.

10. In response to the advertisement, Fried represented to investors that he would purchase homes, renovate the homes and then sell the homes for a profit and all the investors needed to do was provide the funds. Further, Fried represented that investors would receive 12 percent per annum paid monthly. In addition, Fried confirmed the representations in the advertisement that the investors' investments were to be secured with first position liens as advertised.

11. WEBUYHOMESINAZ's website stated its mission "is to help people invest their money safely and securely with a guaranteed high-yield return, while we put good people who don't have great credit into their dream homes!" Further, the information made available for prospective investors stated "when you put your money to work with us, it grows well beyond conventional investments."

12. WEBUYHOMESINAZ website described its investment opportunity as a "high-yield low-risk investment opportunity." Further, the website stated that investors "can make a safe investment in an Arizona Real Estate Secured Loan and Net 10-12%" on their money.

13. The website stated: "Invest with us. Wisely Simply and Safely. Put your money to work with a High-Yield Low-Risk Investment Opportunities." The website also stated that an investment through WEBUYHOMESINAZ is a very safe investment that produces a high-yield. According to the website, investors could expect 10 – 12 % return on their investments in two years.

14. Beginning in about September 2004, through August 2009, at least 16 investors invested $1,976,249.92. Investors have received $923,127.26 from the Respondents. The investment date, principal investment amount, and repayment amount, if any, for each investor are set forth in Exhibit A attached hereto.

15. Investors' funds were deposited into bank accounts controlled by Fried. Investors typically made their investment checks payable to Fried, COMPREHENSIVE, WEBUYHOMESINAZ, ESCALADE, or other entities controlled by Fried. Fried transferred funds between the various bank accounts he controlled.

16. According to the WEBUYHOMESINAZ advertisement and Fried, the investors' "money is secured by a first position lien." A majority of the promissory notes issued by Fried, COMPREHENSIVE, BROOKLYN BOYS or ESCALADE stated that the promissory notes were secured by a "mortgage" or deed of trust on specific properties. The promissory notes were signed by Fried individually or on behalf of one of his entities.

17. With the promissory note, the investors were also provided with a deed of trust listing the same property that was listed on the promissory note. The Deeds of Trusts listed the "grantors" or the Trustors as Fried, BROOKLYN BOYS, ESCALADE or Shefa Ventures, LLC[2].

18. At least one investor agreed to have a second position lien on real property.

19. At least three investors were provided unsecured promissory notes that were signed by Fried individually or on behalf of COMPREHENSIVE.

20. Most investors received promissory notes and deeds of trusts at the time they invested.

21. One group of investors received promissory notes and deeds of trusts several years after their investments were made. Only after repeated requests for documentation regarding their investments did they receive the promissory notes and deeds of trusts. The deeds of trusts appeared

[2] Shefa Ventures, LLC was, since February 18, 2005, an Arizona limited liability company whose manager and member was FRIED. On July 1, 2005, COMPREHENSIVE replaced FRIED as the sole member and manager of Shefa Ventures, LLC. As of January 5, 2011, FRIED became the sole member and manager of Shefa Ventures, LLC.

to have been recorded with the Maricopa County Recorder's office when, in fact, the recordation stamp was forged and there was no recording reflecting the investors' interest in the property. In fact, on a number of transactions, neither Fried nor his entities held title to the real property that was listed in the deeds of trusts.

22. The monthly interest payments Fried paid to investors were drawn on any of the bank accounts Fried controlled including, but not limited to, COMPREHENSIVE, WEBUYHOMES and other Fried controlled entities. Often, the interest payments to investors were made with other investors' funds. In at least one instance, interest payments were made to an investor with their own funds.

23. The term of the investment was for six months, but Fried subsequently changed it to one year. Fried offered some of the investors the option of receiving monthly interest payments calculated at 12 percent per annum. Other investors were promised an 18 to 20 percent return.

24. Investors received monthly interest payments from one of the bank accounts Fried controlled, until about November 2008. After November 2008, the payments to investors were paid late. Then, Fried began issuing checks to investors for monthly interest payments on accounts containing insufficient funds. Eventually, the payments to investors ceased.

25. On March 2, 2009, Fried sent an email to some investors stating that all interest payments would be suspended for "approximately 120 days" to "ensure that our investors/lenders principal will remain intact, and to avoid any foreclosures. . .." In addition, the interest rates would be reduced to six percent. In the same email, Fried stated that "we have been consumed with maintaining our credit worthiness and good standing with our lenders by borrowing from one source to pay the others and this has created a massive strain and chaos on completing our projects to accomplish our goals while paying double digit interest rates. However, I regret to say, this is simply not sustainable any longer."

26. Respondents used investor funds for purposes other than what was represented to the investors. For instance, investor funds were used to repay prior investors and Fried's personal expenses.

II.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over this matter pursuant to Article XV of the Arizona Constitution and the Securities Act.

2. Respondents offered or sold securities within or from Arizona, within the meaning of A.R.S. §§ 44-1801(15), 44-1801(21), and 44-1801(26).

3. Respondents violated A.R.S. § 44-1841 by offering or selling securities that were neither registered nor exempt from registration.

4. Respondents violated A.R.S. § 44-1842 by offering or selling securities while neither registered as dealers or salesmen nor exempt from registration.

5. Respondents violated A.R.S. § 44-1991 by (a) employing a device, scheme, or artifice to defraud, (b) making untrue statements or misleading omissions of material facts, or (c) engaging in transactions, practices, or courses of business that operate or would operate as a fraud or deceit.

6. COMPREHENSIVE directly or indirectly controlled persons or entities within the meaning of A.R.S. § 44-1999, including but not limited to WEBUYHOMESINAZ, BROOKLYN BOYS AND ESCALADE. Therefore, COMPREHENSIVE is jointly and severally liable under A.R.S. § 44-1999 to the same extent as WEBUYHOMESINAZ, BROOKLYN BOYS AND ESCALADE for any violations of A.R.S. § 44-1991.

7. Respondents' conduct is grounds for a cease and desist order pursuant to A.R.S. § 44-2032.

8. Respondents' conduct is grounds for an order of restitution pursuant to A.R.S. § 44-2032.

9. Respondents' conduct is grounds for administrative penalties under A.R.S. § 44-2036.

III.

ORDER

THEREFORE, on the basis of the Findings of Fact and Conclusions of Law, the Commission finds that the following relief is appropriate, in the public interest, and necessary for the protection of investors:

IT IS ORDERED, pursuant to A.R.S. § 44-2032, that Respondents, and any of Respondents' agents, employees, successors and assigns, permanently cease and desist from violating the Securities Act.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2032, that Respondents COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE jointly and severally shall pay restitution to the Commission in the principal amount of $1,053,122.66, plus interest from the date of purchase until paid in full, subject to legal setoffs pursuant to A.A.C. R14-4-308, as shown on attached Exhibit A. Payment is due in full on the date of this Order. Payment shall be made to the "State of Arizona" to be placed in an interest-bearing account controlled by the Commission.

IT IS FURTHER ORDERED that the restitution ordered hereinabove shall bear interest at the rate of the lesser of ten percent per annum or at a rate per annum that is equal to one per cent plus the prime rate as published by the board of governors of the federal reserve system in statistical release H.15 or any publication that may supersede it on the date that the judgment is entered.

The Commission shall disburse the funds on a pro-rata basis to investors shown on the records of the Commission. Any restitution funds that the Commission cannot disburse because an investor refuses to accept such payment, or any restitution funds that cannot be disbursed to an investor because the investor is deceased and the Commission cannot reasonably identify and

locate the deceased investor's spouse or natural children surviving at the time of the distribution, shall be disbursed on a pro-rata basis to the remaining investors shown on the records of the Commission. Any funds that the Commission determines it is unable to or cannot feasibly disburse shall be transferred to the general fund of the state of Arizona.

IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-2036, that Respondents COMPREHENSIVE, WEBUYHOMESINAZ, BROOKLYN BOYS and ESCALADE, jointly and severally pay an administrative penalty in the amount of $150,000. Payment is due in full on the date of this Order. Payment shall be made to the "State of Arizona." Any amount outstanding shall accrue interest as allowed by law.

IT IS FURTHER ORDERED that the penalty ordered hereinabove shall bear interest at the rate of the lesser of ten percent per annum or at a rate per annum that is equal to one per cent plus the prime rate as published by the board of governors of the federal reserve system in statistical release H.15 or any publication that may supersede it on the date that the judgment is entered.

IT IS FURTHER ORDERED that payments received by the state of Arizona shall first be applied to the restitution obligation. Upon payment in full of the restitution obligation, payments shall be applied to the penalty obligation.

IT IS FURTHER ORDERED, that if any Respondent fails to comply with this order, the Commission may bring further legal proceedings against that Respondent, including application to the superior court for an order of contempt.

IT IS FURTHER ORDERED, that pursuant to A.R.S. § 44-1974, upon application the Commission may grant a rehearing of this Order. The application must be received by the Commission at its offices within twenty calendar days after entry of this Order. Unless otherwise ordered, filing an application for rehearing does not stay this Order. If the Commission does not grant a rehearing within twenty calendar days after filing the application, the application is considered to be denied. No additional notice will be given of such denial.

IT IS FURTHER ORDERED, that no finding of fact or conclusion of law contained in this Order shall be deemed binding against any Respondent under this Docket Number who is not subject to this Order.

IT IS FURTHER ORDERED that this Order shall become effective immediately.

BY ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRMAN COMMISSIONER

COMMISSIONER COMMISSIONER COMMISSIONER

IN WITNESS WHEREOF, I, ERNEST G. JOHNSON, Executive Director of the Arizona Corporation Commission, have hereunto set my hand and caused the official seal of the Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2012.

ERNEST G. JOHNSON
EXECUTIVE DIRECTOR

DISSENT

DISSENT

This document is available in alternative formats by contacting Shaylin A. Bernal, ADA Coordinator, voice phone number 602-542-3931, e-mail sabernal@azcc.gov.

(wlc)

EXHIBIT A

Investor	Investment Date	Original Investment Amount	Money Returned	Restitution owed at order date
A-1	1/22/2007	75,000.00		75,000.00
A-2	2/13/2007	20,000.00		20,000.00
A-3	5/22/2007	20,000.00		20,000.00
B-1	11/4/2004	30,000.00	30,000.00	-
B-2	6/29/2007	10,000.00	9,106.00	894.00
C-1	7/12/2005	15,000.00	15,000.00	-
C-2	9/12/2005	50,000.00	50,000.00	-
C-3	9/12/2005	60,000.00	47,366.29	12,633.71
C-4	11/4/2005	50,000.00		50,000.00
C-5	1/24/2006	50,000.00		50,000.00
C-6	3/7/2006	65,000.00		65,000.00
C-7	10/10/2006	50,000.00		50,000.00
D-1	3/7/2007	20,000.00	9,378.00	10,622.00
D-2	10/2/2007	10,000.00		10,000.00
D-3	10/2/2007	10,000.00		10,000.00
D-4	10/2/2007	10,000.00		10,000.00
D-5	10/2/2007	10,000.00		10,000.00
D-6	10/2/2007	10,000.00		10,000.00
D-7	10/2/2007	10,000.00		10,000.00
D-8	7/17/2008	35,000.00		35,000.00
E-1	8/6/2008	30,000.00		30,000.00
F-1	3/8/2005	14,249.92		14,249.92
G-1	11/25/2005	40,000.00	40,000.00	-

G-2	6/23/2006	30,000.00	6,199.99	23,800.01
G-3	4/25/2007	20,000.00		20,000.00
G-4	10/14/2008	50,000.00		50,000.00
H-1	7/12/2005	25,000.00	36,127.34	(11,127.34)
I-1	10/20/2004	30,000.00	30,000.00	-
I-2	1/20/2005	135,000.00	135,000.00	-
I-3	5/18/2005	175,000.00	58,965.00	116,035.00
I-4	10/10/2006	25,000.00		25,000.00
I-5	6/8/2007	160,000.00		160,000.00
J-1	3/1/2007	10,000.00	10,000.00	-
J-2	8/22/2007	15,000.00	15,000.00	-
J-3	10/31/2007	15,000.00	15,000.00	-
J-4	7/31/2008	20,000.00	4,546.00	15,454.00
K-1	9/11/2006	25,000.00	25,000.00	-
K-2	12/24/2008	90,000.00		90,000.00
L-1	12/13/2004	10,000.00	10,000.00	-
L-2	12/8/2005	8,800.00	8,800.00	-
L-3	12/8/2005	1,200.00	7,268.64	(6,068.64)
M-1	7/5/2006	15,000.00	15,000.00	-
M-2	12/26/2006	5,000.00	5,000.00	-
M-3	4/13/2007	2,500.00	300.00	2,200.00
N-1	4/25/2006	15,000.00	15,000.00	-
N-2	5/3/2006	35,000.00	35,000.00	-
N-3	8/21/2006	28,000.00	28,000.00	-
N-4	11/21/2006	10,000.00	2,260.00	7,740.00

N-5	12/7/2006	10,000.00		10,000.00
N-6	1/11/2007	10,000.00		10,000.00
O-1	8/8/2006	10,000.00	10,000.00	-
O-2	11/13/2006	20,000.00	12,400.00	7,600.00
O-3	10/11/2007	20,000.00		20,000.00
P-1	5/25/2004	5,000.00	5,000.00	-
P-2	5/25/2004	1,500.00	1,500.00	-
P-3	12/8/2004	5,000.00	5,000.00	-
P-4	12/16/2004	145,000.00	145,000.00	-
P-5	8/11/2005	23,500.00	23,500.00	-
P-6	9/9/2005	25,000.00	25,000.00	-
P-7	9/9/2005	21,500.00	21,500.00	-
P-8	10/3/2005	10,000.00	10,000.00	-
P-9	12/20/2005	20,000.00	910.00	19,090.00
		1,976,249.92	923,127.26	1,053,122.66
			Total Restitution owed at Order Date:	1,053,122.66

SERVICE LIST FOR: ARTHUR FRIED, COMPREHENSIVE CASH FLOW FUNDING, INC., WEBUYHOMESINAZ, LLC, MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC and LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC.

Arthur Fried
1413 42nd St
Brooklyn, NY 11219

Arthur Fried
1421 Sheepshead Bay Road, No. 163
Brooklyn, NY 11235

COMPREHENSIVE CASH FLOW FUNDING, INC.
PO Box 14858
Scottsdale, AZ 85267

WEBUYHOMESINAZ, LLC
20235 N. Cave Creek Rd #104-626
Phoenix, AZ 85024

MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC
20235 N. Cave Creek Rd #104-626
Phoenix, AZ 85024

LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC
PO Box 14858
Scottsdale, AZ 85267

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

In the matter of: ARTHUR FRIED, an unmarried man, COMPREHENSIVE CASH FLOW FUNDING, INC., a dissolved Arizona corporation, WEBUYHOMESINAZ, LLC, an Arizona limited liability company, MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC, an Arizona limited liability company, and LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC, an Arizona limited liability company, Respondents.	DOCKET NO. S-20826A-11-0455 **NOTICE OF FILING OF AMENDED PROPOSED OPEN MEETING AGENDA ITEM**

Pursuant to A.A.C. R14-4-303, you are hereby notified that the attached: Order To Cease And Desist, Order For Restitution And Order For Administrative Penalties Re: Comprehensive Cash Flow Funding, Inc., Webuyhomesinaz, LLC, My Bargain Gift Bag, LLC fka Brooklyn Boys Ventures, LLC And Loan Mod Shrink, LLC fka Escalade Ventures, LLC was filed with the Arizona Corporation Commission's Docket Control.

Dated: 3/6/12

By: Wendy Coy
Wendy Coy

I hereby certify that I have this day served the foregoing document on all parties of record in this proceeding by mailing a copy thereof, properly addressed with first class postage prepaid to:

Arthur Fried
1413 42nd St
Brooklyn, NY 11219

Arthur Fried
1421 Sheepshead Bay Road, No. 163
Brooklyn, NY 11235

COMPREHENSIVE CASH FLOW FUNDING, INC.
PO Box 14858
Scottsdale, AZ 85267

WEBUYHOMESINAZ, LLC
20235 N. Cave Creek Rd #104-626
Phoenix, AZ 85024

MY BARGAIN GIFT BAG, LLC FKA BROOKLYN BOYS VENTURES, LLC
20235 N. Cave Creek Rd #104-626
Phoenix, AZ 85024

LOAN MOD SHRINK, LLC FKA ESCALADE VENTURES, LLC
PO Box 14858
Scottsdale, AZ 85267

Dated: 3/6/12

By: Emie R. Bridges
Emie R. Bridges, Executive Assistant