UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 26-60976-CIV-AHS

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

INNOVATIVE PARTNERS, LP, d/b/a, INNOVATIVE HEALTH PLAN or HEALTHCARE PLAN; AMERICAN COLLECTIVE, LP, d/b/a ACLP HEALTH PLAN; HEALTH PLAN ADMINISTRATORS LLC; PAPYRUS GREEN INVESTMENTS LLC; AHMED IBRAHIM SHOKRY; AMERICAN COLLECTIVE, LP; PAPYRUS GREEN INVESTMENTS LLC; and AMANI IBRAHIM SHOKRY,

Defendants.
_____/

RECEIVER'S NOTICE OF COMPLIANCE AND CERTIFICATE OF SERVICE

Paul O. Lopez as Receiver ("Receiver") for Innovative Partners, LP d/b/a Innovative Health Plan or Healthcare Plan; American Collective, LP, d/b/a ACLP Health Plan; Health Plan Administrators, LLC; Papyrus Green Investments, LLC; and Prosperity Health, LLC (collectively, the "Receivership Entities"), hereby give notice of their compliance with the terms of this Court's Order [ECF No. 94], and certifies that a true and correct copy of the Order on Receiver's Motion to Compel Safe Guard Management, LLC's Response to Subpoena [ECF No. 94], was delivered via Federal Express overnight mail to Safe Guard Management, LLC's Registered Agent and Principal Address today, June 30, 2026.

Dated this 30th day of June, 2026

TRIPP SCOTT, P.A.
Counsel to the Receiver
110 S.E. 6th Street, 15th Floor
Ft. Lauderdale, FL 33301
Phone: (954) 525-7500

By: */s/ Charles M. Tatelbaum*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of June, 2026, I electronically filed the foregoing document via this Court's CM/ECF system which provided a true copy to all those entitled to notice.

By: */s/ Charles M. Tatelbaum*
Charles M. Tatelbaum, Esquire
Florida Bar No. 177540