

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JULIE A. SU, Acting Secretary of Labor,)
U.S. DEPARTMENT OF LABOR,)
)
Plaintiff,)

v.)

RIVERSEDGE ADVANCED RETIREMENT)
SOLUTIONS, LLC., a Pennsylvania Company,)
JENNIFER PALGUTA, an individual,)

No. 2:24-cv-00104 (MJH)

v.)

MID ATLANTIC TRUST COMPANY dba)
AMERICAN TRUST CUSTODY, a corporation,)
SCHWAB RETIREMENT TECHNOLOGIES,)
INC., a corporation, and CHARLES SCHWAB)
TRUST BANK, a corporation, *solely as Rule 19*)
defendants,)

v.)

BEAVER COUNTY DEFERRED)
COMPENSATION PLAN, CHRISTIAN)
AID MISSION 403(b) PLAN, and)
LCBC CHURCH 403(b) PLAN,)
solely as Rule 19 defendants,)

Defendants.)

NOTICE OF INDEPENDENT FIDUCIARY’S ADDRESS CHANGE

PLEASE TAKE NOTICE that Receivership Management, Inc., a court-appointed Independent Fiduciary, by its counsel, hereby notifies the Court and the parties that effective immediately its mailing address has changed to: Receivership Management, Inc., 1994 Gallatin Pike N, Ste 202, Madison, Tennessee 37115.

Respectfully submitted,

RECEIVERSHIP MANAGEMENT, INC., AS
COURT-APPOINTED INDEPENDENT
FIDUCIARY OF MISMANAGED PLANS OF
RIVERSEDGE ADVANCED RETIREMENT
SOLUTIONS LLC,

/s/ Bynum E. Tudor III

Bynum E. Tudor III (TN Bar 012279)

Admitted Pro Hac Vice

Berry & Tudor PC

5123 Virginia Way

Suite B-23

Brentwood, Tennessee 37027

(615) 726-1000

(615) 370-0077 (fax)

btudor@berrytudor.com

Counsel for Receivership Management, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JULIA A. SU, ACTING SECRETARY OF U.S.)	
DEPARTMENT OF LABOR,)	
)	
Plaintiff,)	CASE NO. 2:24-CV-00104 (MJH)
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v.)	
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RIVERSEDGE ADVANCED RETIREMENT)	
SOLUTIONS, LLC a Pennsylvania Company,)	
JENNIFER PALGUTA, an individual,)	
)	
v.)	
)	
MID ATLANTIC TRUST COMPANY dba)	
AMERICAN TRUST CUSTODY, a)	
corporation, and CHARLES SCHWAB)	
TRUST BANK, a corporation, solely as Rule 19)	
defendants,)	
Defendants.)	

**CERTIFICATE OF SERVICE REGARDING NOTICE OF INDEPENDENT
FIDUCIARY’S ADDRESS CHANGE**

I hereby certify that on January 14, 2025, I caused a Notice of Filing of the Independent Fiduciary’s change of address [Dkt. 166], to be filed and electronically served using the Court’s CM/ECF system to counsel for all parties to this action.

I also hereby certify that on January 14, 2025, I caused a Notice of Filing of the Independent Fiduciary’s change of address [Dkt. 166], to be served upon the following fourteen (14) non-party plans listed in the Court’s Preliminary Injunction Order [Dkt. 40], by email:

- (1) RiversEdge 401(k) Profit Sharing Plan (pshoup@amibenefit.com);
- (2) Hampton Technical Associates 401(k) Profit Sharing Plan (MarkS@Hampton-Tech.net) and (mbetts@bettsllc.com) and (ggunnett@hh-law.com);
- (3) Max Environmental Technologies, Inc. 401(k) Savings Plan (JStango@MaxEnvironmental.com);
- (4) Medical Predictive Science Corporation (GAlms@HeroScore.com);
- (5) Elite Mechanical, Inc. 401(k) Profit Sharing Plan (donna@elite-mechanical.com);
- (6) Leech Tishman Fuscaldo & Lampl, LLC 401(k) Profit Sharing Plan (jsteiner@leechtishman.com);

- (7) W.N. Tuscano Agency, Inc. 401(k) Savings Plan (scrary@tuscano.com);
- (8) St. Barnabas Health System Retirement Savings Plan (jdturco@stbarnabashealthsystem.com);
- (9) Hawaiian Island Dental, Inc. 401(k) Plan (allhawaiiismiles@hotmail.com);
- (10) Ad-base Group 401K Plan (adams@abgcapital.com);
- (11) Arc of Wabash County Inc. 403(b) Plan (MGuthrie@ArcWabash.org);
- (12) Adventure WV Plan (m.fowler@onthegorge.com);
- (13) The National Fruit Product Co., Inc. 401(k) Employee Savings Plan (atinsman@nfpc.com) and (agum@nfpc.com) and (tomwillis@glenlochlegal.com); and
- (14) Family Medicine of Albemarle 401(k) Plan (rwynne@mcguirewoods.com) and (lsneathern@mcguirewoods.com).

Further, on or before January 15, 2025, the Independent Fiduciary posted/will post a copy of the Notice of Filing of the Independent Fiduciary's change of address [Dkt. 166], on its web site at www.receivermgmt.com/riversedge.

Respectfully submitted,

**RECEIVERSHIP MANAGEMENT, INC., AS
COURT-APPOINTED INDEPENDENT
FIDUCIARY OF MISMANAGED PLANS AND
CLIENT PLANS OF RIVERSEDGE
ADVANCED RETIREMENT SOLUTIONS
LLC,**

/s/ Bynum E. Tudor III

Bynum Tudor III (TN Bar 012279)

Admitted Pro Hac Vice

Berry & Tudor PC

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Brentwood, Tennessee 37027

(615) 726-1000

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btudor@berrytudor.com

Counsel for Receivership Management, Inc.