

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 20-CV-81205-RAR**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a PAR FUNDING, *et al.*

Defendants.

**RECEIVER, RYAN K. STUMPHAUZER'S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE SWORN STATEMENT**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of Defendants Complete Business Solutions Group, Inc. d/b/a Par Funding (“Par Funding”); Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; and RE Income Fund 2 LLC (the “Receivership Entities”), by and through undersigned counsel, hereby files this Unopposed Motion for Extension of Time to File Sworn Statement pursuant to Paragraph 9 of the Amended Receivership Order (the “Amended Receivership Order”) (ECF No. 141), and states as follows:

1. On August 13, 2020, the Court entered the Amended Receivership Order. Pursuant to Paragraph 9 of the Amended Receivership Order, the Receivership Entities are required to file a sworn statement within 10 days from the entry of the Receivership Order that lists: “(a) the

identity, location and estimated value of all Receivership Property; (b) all employees (and job titles thereof), other personnel, attorneys, accountants and any other agents or contractors of the Receivership Entities; and, (c) the names, addresses and amounts of claims of all known creditors of the Receivership Entities.”

2. The Receiver is still in the process of gaining access to records and information necessary to prepare the sworn statement on behalf of the Receivership Entities. For example, the Receiver was first able to access the QuickBooks account for Complete Business Solutions Group, Inc. and Full Spectrum, Inc. today, August 21, 2020. The Receiver is currently downloading a forensic copy of that database. Once that download has been completed, the Receiver and its consultant will be able to access and review that information for the purpose of preparing the sworn statement.

3. Accordingly, the Receiver respectfully requests an extension of time, through and including August 31, 2020, to file this sworn statement on behalf of the Receivership Entities.

4. The Court stated on the record during the preliminary injunction hearing on August 21, 2020, that it would be granting this extension of time through a paperless order. Accordingly, the Receiver is not submitting a proposed Order, as would otherwise be required pursuant to Local Rule 7.1(a)(2).

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant an extension of time, through and including August 31, 2020, for the Receiver to file the sworn statement of account for the Receivership Entities, as required pursuant to Paragraph 9 of the Receivership Order.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with all counsel of record in this matter regarding the relief sought through this motion and certifies that, on the record during the preliminary injunction hearing on August 21, 2020, counsel for the parties confirmed that they did not oppose the relief sought in this motion.

Dated: August 21, 2020

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 21, 2020, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya

TIMOTHY A. KOLAYA