

**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 MOTION TO
STAY CASE AS TO THE RECEIVERSHIP ENTITY DEFENDANTS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through undersigned counsel, files this Motion to Stay Case as to the Receivership Entities that are Defendants in this case, and states:

1. On October 24, 2020, the Court entered an Order directing the Defendants in this case to file a single combined response or separate answers to the Plaintiff’s Amended Complaint, on or before November 2, 2020. [ECF No. 347].

¹ The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a 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; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; and MK Corporate Debt Investment Company LLC.

2. Several of the Receivership Entities—namely Complete Business Solutions Group, Inc. d/b/a 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—are Defendants in this action (the “Receivership Entity Defendants”).

3. The Receiver has noted several times that he intends to consent to a judgment on behalf of the Receivership Entity Defendants. [*E.g.*, ECF No. 359 at p. 7].

4. To that end, the Receiver is in discussions with the Securities and Exchange Commission about finalizing and executing a consent judgment, and anticipates that he will be in a position to file the proposed consent judgment within the next several days.

5. Accordingly, the Receiver respectfully requests a stay of this action for seven (7) days, through and including November 9, 2020, to allow the Receiver additional time to finalize the consent judgment on behalf of the Receivership Entity Defendants. In the event the Receiver finalizes the consent judgment within this period, as anticipated, it will obviate the need for the Receiver and his counsel to expend time and resources on responding to the Amended Complaint on behalf of the Receivership Entity Defendants, and it will preserve the Receivership Estate.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant a stay of this case as to the Receivership Entity Defendants, through and including November 9, 2020.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with the Securities and Exchange Commission regarding the relief sought through this motion and certifies that the Securities and Exchange Commission does not oppose this extension of time.

Dated: November 2, 2020

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 2, 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

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Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER'S
MOTION TO STAY CASE AS TO THE RECEIVERSHIP ENTITY DEFENDANTS**

THIS CAUSE comes before the Court upon the Receiver's Motion to Stay Case as to the Receivership Entity Defendants [ECF No. ____] ("Motion"), filed on November 2, 2020. The Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

ORDERED AND ADJUDGED that the Motion is **GRANTED**.

This case is hereby stayed as to the Receivership Entities that are Defendants—namely Complete Business Solutions Group, Inc. d/b/a 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—through and including November 9, 2020.

On or before November 9, 2020, the Securities and Exchange Commission and the Receiver shall finalize and submit the proposed consent judgment the Receiver intends to enter into on behalf of the Receivership Entity Defendants or, alternatively, the Receiver shall file a report regarding the status of his efforts to finalize the consent judgment.

DONE AND ORDERED in Fort Lauderdale, Florida, this _____ day of November, 2020.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record