

**IN THE 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, YAN K. STUMPHAUZER’S STATUS REPORT
REGARDING [ECF NO. 365] ORDER GRANTING 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, hereby files this Status Report regarding [ECF No. 365] the Court’s Order Granting Motion to Stay Case as to the Receivership Entities that are Defendants, and states:

1. 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

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.

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”).

2. On November 2, 2020, the Court granted the Receiver’s Motion to Stay Case as to the Receivership Entity Defendants. (ECF No. 365). In that Order, the Court indicated that “[o]n 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.” (*Id.*, ¶ 2).

3. The Receivership Entity Defendants have now agreed with the Securities and Exchange Commission on the form of a stipulated Judgment of Permanent Injunction and Other Relief Against the Corporate Defendants (the “Proposed Judgment”). Accordingly, the Receiver anticipates that the Securities and Exchange Commission will file a motion in the near future requesting entry of the Proposed Judgment.

WHEREFORE, the Receiver respectfully submits this status report regarding the Court’s Order Granting Motion to Stay Case as to the Receivership Entities that are Defendants.

Dated: November 9, 2020

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 9, 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