

**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 RYAN K. STUMPHAUZER'S NOTICE OF FILING
REPORT ON OPERATIONS IN CONNECTION WITH STATUS
CONFERENCE TO BE CONDUCTED ON DECEMBER 15, 2020**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver ("Receiver") of the Receivership Entities,¹ by and through undersigned counsel, provides notice of filing a report from its consultant, Development Specialists, Inc., regarding the financial status of the Receivership Entities, a copy of which is attached as Exhibit 1, in connection with the status conference scheduled for December 15, 2020. *See* Paperless Order dated November 24, 2020 (ECF No. 406).

¹ The "Receivership Entities" are Complete Business Solutions Group, Inc. d/b/a Par Funding ("Par Funding"); Full Spectrum Processing, Inc. ("Full Spectrum"); 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.

Dated: December 13, 2020

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 13, 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

Exhibit “1”

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

SECURITIES AND EXCHANGE COMMISSION,

v.

CASE NO.: 20-cv-81205-RAR

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

Defendants.

DECLARATION OF BRADLEY D. SHARP

Pursuant to 28 U.S.C. Section 1746, the undersigned states as follows:

1. My name is Bradley D Sharp. I am over twenty-one years of age and have personal knowledge of the matters set forth herein.
2. I am CEO of Development Specialists, Inc., the financial advisor to the Receiver, Ryan K. Stumphauzer.
3. I am the primary engagement manager for all matters relative to Complete Business Solutions Group, Inc., d/b/a Par Funding (“CBSG”) and related Receivership Entities.
4. I have overseen my staff’s analyses of CBSG’s books and records and have reviewed their work. My staff includes experienced forensic accountants maintaining CPA, CFF and CFE certifications.
5. This declaration will provide our preliminary findings with respect to our analysis of CBSG. The analysis will provide conclusions regarding the CBSG sources and uses of cash through 2019, an analysis of merchants that account for 50% of the receivable

portfolio and comments with respect to the hypothetical analysis provided by the Defendants.

Summary of Conclusions:

6. From inception through 2019, CBSG generated only \$6.6 million in cash from MCA Activity despite advancing \$1.1 billion in MCA transactions.

7. From inception through 2019, CBSG paid more than \$144 million to or for the benefit of LaForte, McElhone, Cole and Abbonizio (“Insiders”).

8. From inception through 2019, CBSG incurred a cash loss from operations of \$136.2 million.

9. From inception through 2019, CBSG paid \$231.0 million to investors, consisting of principal repayments totaling \$135.6 million and interest payments totaling \$95.4 million. CBSG could not have made these principal and interest payments to the investors without additional funds from the investors.

10. A significant amount of the receivable portfolio consists of “factors,” fees and expense and not cash advanced.

11. It appears that many of the larger merchants have made payments to CBSG with funding from CBSG.

12. The Defendants hypothetical portfolio analysis in the Defendants’ Joint Response to the Status Report [ECF Doc No.355] is misleading and does not reflect actual operations at CBSG.

Cash Sources and Uses:

13. Our preliminary conclusions summarized above are based on our analysis of CBSG’s cash sources and uses for the calendar years 2012 through 2019. In order to do

so, we utilized the receipts and disbursements from CBSG's QuickBooks file which were then reconciled to the CBSG bank statements. The transactions were categorized based largely on CBSG's accounting for each. In other words, we identified the "other side" of the entry for each cash receipt or disbursement. For a receipt, we identified the account to which the corresponding credit was recorded (e.g., Accounts Payable). For a disbursement, we identified the account to which the corresponding debit was recorded (e.g., Interest Expense).

14. While we are confident that our analysis encompasses virtually all cash transactions through 2019 and reflects the nature of the transactions as accounted for by CBSG, this analysis should be considered preliminary as we are still researching the purpose of certain transactions and evaluating the transactions in 2020.¹

15. Attached as Exhibit A is our summary of CBSG cash sources and uses for the period from inception through 2019. The following chart is a high-level overview of the cash activity (dollars in millions):

Category	Receipts	Disbursements	Net
Investors	\$ 479.3	\$ (231.0)	\$ 248.3
MCA Activity	1,103.9	(1,097.3)	6.6
Operating Expenses	1.3	(27.7)	(26.4)
Commissions/Consulting Fees:			
To/FBO Related Entities	-	(77.0)	(77.0)
To Other Entities	-	(39.4)	(39.4)
Other Related Entity Activity	4.7	(72.0)	(67.3)
Totals	<u>\$ 1,589.2</u>	<u>\$ (1,544.4)</u>	<u>\$ 44.8</u>

¹. We have reviewed the analysis presented by the SEC through June 2020. Our analysis is through December 2019 and other than the scope and minor classification issues, our results are consistent with the SEC analysis.

16. Although there were significant transactions, CBSG did not generate a positive cash flow:

- a. CBSG had receipts of \$1.1 billion including \$943.0 million of payments from MCA clients and \$160.9 million of payments relating to joint funding involving participations with other MCA lenders. CBSG disbursed \$1.1 billion which included \$938.3 million of advances to MCA clients and \$159.0 million of payments relating to joint funding activity. Despite this level of cash transactions, CBSG generated only \$6.6 million in net cash from MCA activity through 2019 (“MCA Activity”).
- b. From inception through 2019, CBSG paid \$116.4 million in commissions and consulting fees to the following entities:
 - Heritage Business Consulting (McElhone) - \$37.8 million
 - Eagle Six Consultants (McElhone) - \$24.4 million
 - New Field Ventures (Cole) - \$9.9 million
 - Beta Abigail (Abingozi)- \$4.9 million
 - All other entities combined - \$39.4 million

Of this \$116.4 million, \$77.0 million was paid to companies controlled by Insiders.

- c. CBSG paid net operating expenses of \$26.4 million.
- d. From inception through 2019, CBSG generated a negative cash flow from operations of \$136.2 million:

Cash from MCA Activity	\$6.6 million
Less:	
Commissions & consulting fees	\$116.4 million
Operating expenses	<u>\$26.4 million</u>
Cash flow from operations	(\$136.2) million

- e. In addition to the commissions and consulting fees referenced above, from inception through 2019, CBSG made net payments of \$67.3 million to, or for the benefit of, Insiders and related entities

McElhone/LME Trust	\$40.6 million
Full Spectrum Processing	\$9.1 million
RMR Holdings (LaForte)	\$6.9 million
Eagle Union Quest (private jet)	\$6.2 million
Heritage Business Consulting	\$3.7 million
Other (combined)	\$0.8 million
Total Related Entity Activity	\$67.3 Million

- f. Thus, CBSG paid a total of \$144.3 million to Insiders and their related entities through 2019.

- g. The net cash flow from non-investor activities was negative \$203.5 million:

Cash loss from operations, which includes \$116.4 million in commissions, with \$77 million paid to Insiders	(\$136.2) million
Payments for the benefit of Insiders	(\$67.3) million
Total negative cash flow from non-investor activities	(\$203.5) million

17. Due to the significant negative cash flow from non-investor activities, CBSG required additional funds from investors in order to sustain the business and to make the principal and interest payments on the investor notes.

- a. The cash loss of \$203.5 million from non-investor activities does not include payments to investors for principal and interest of \$231.0 million.
- b. Investors provided CBSG \$479.3 million in investments and CBSG paid \$231.0 million to investors, consisting of principal repayments totaling \$135.6 million and interest payments totaling \$95.4 million.
- Thus, the investors provided net cash to CBSG of \$248.3 million. Given the cash loss of \$203.5 million, CBSG could not have made the principal and interest payments totaling \$231.0 million to the investors without the \$479.3 million in funds from the investors.

Portfolio Analysis

18. To analyze the CBSG portfolio, we conducted detailed analyses with respect to

a subset of the CBSG merchants. Based on our analyses, these merchant accounts demonstrated unusual activity, such as:

- a. Outstanding balances significantly larger than supported by the financial information located in the CBSG books and records.
- b. Significant reload activity, within the merchant and reloads across merchants (e.g., transferring an advance from one merchant to another).
- c. Cash payments by merchants dependent on continuing advances to the same merchants.
- d. Ownership position in certain merchants by CBSG's affiliates and related parties.

19. The merchant accounts that have unusual activity have been defined as the Exception Portfolio. We have located 16 individual merchants demonstrating some or all of the above characteristics. These have been combined into 5 groups based on common ownership, reloads and other transactions between the merchants.

20. Our analysis of the Exception Portfolio includes the following:

- a. B & T Supply Group (including B & T Supply, Lifeguard, Yanky Holding, YBT Industries Inc., Naki Cleaning Services, and Anglo China)
- b. Colorado Homes Group (including Colorado Homes, United by ECH, CNP Operating, Colorado Sky, and escrow held by Dickinson Wright)
- c. Kingdom Logistics
- d. Big Red Express Group (including Big Red Ltl, Bulova Technologies, and Twiss Cold Storage)
- e. National Brokers of America

21. Our analysis of the CBSG portfolio noted significant use of “reloads.” A reload is essentially CBSG refinancing a pre-existing MCA advance. The “reload” advance would normally fund the merchant with additional cash and repay the existing advance. The reload, with the “factor”, becomes the new outstanding obligation. By way of example, on June 27th, 2019, CBSG advanced \$700,000 (and advance origination fees) to B & T Supply² with a daily payment obligation that was scheduled to last for 154 days. CBSG added a “factor” of \$224,000 to the cash advance, creating an Outstanding Balance of \$924,000. After payments of \$53,995, on July 11th, 2019, CBSG incorporated the unpaid balance of \$870,045 into a reload advance.³ The terms of the reload advance agreement state “Payoff Existing: \$870,045 Purchase Price New: \$1,000,000”, which indicates that the advance paid off the unpaid balance of \$870,045. This transaction occurred a mere two weeks after the initial advance with only 5.8% of the expected payback amount having been repaid. CBSG wired out \$1,000,000 in new money (less advance origination fees) and charged an additional “factor” of \$598,414, thereby creating a new Outstanding Balance of \$2,468,459. Combined, through these advances, payment and reload, CBSG funded \$1,700,000, charged a “factor” of \$822,414 and created a new receivable of \$2,468,459.

22. Use of reloads escalates the obligations of the merchant as each reload adds an additional “factor” along with any new funds advanced. In the example above, the \$870,045 in reloaded funds is subject to the factor twice; once when the funds were originally sent and again when they are included in the reload advance. The use of reloads also significantly distorts the calculation of loss rates as the advances are simply refinanced without becoming a loss. Our analysis also noted the frequent use of “combination” reloads involving the

² Coded BAND003:19010 in CBSG’s books and records.

³ Coded BAND003:19011.

Exception Portfolio. These types of reloads occurred when multiple prior advances were reloaded prior to their final payment dates into a single new advance. Some of these combination reloads included new funds being advanced, however others did not include any new funds being advanced at all. In a reload without new funds being advanced, CBSG would determine the total amount needed to combine the prior advances into the new combination advance. CBSG then applied an additional “factor” to the new combination advance balance resulting in a payment amount that was greater than the payments required under the prior, uncombined advances.

23. This practice of rolling advances into a new obligation becomes apparent when there is significant growth in a merchant’s obligation unrelated to its business operations. As demonstrated by the table that follows, a substantial, portion of the Exception Portfolio, and therefore the receivable as a whole, is a result of reloads and not cash advanced.

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24. The following table provides a summary of the activities with respect to the Exception Portfolio from the inception of the relationship to November 2020:

CBSG Exception Portfolio Merchant Balances and Fees

	Start of Relationship [1]	Cash Out	Cash Back	Net Cash Exposure [2]	Net Balance Transferred	Outstanding Fees and Other Charges [3]	% of Outstanding Balance	Outstanding Balance	
B & T Supply	05/15/15	50,485,491	48,567,460	1,918,030	18,838,973	57,227,914	73%	77,984,917	[4] *
Lifeguard	02/06/20	17,531,669	9,566,636	7,965,033	3,032,210	2,362,567	18%	13,359,810	[4] *
Yanky Holding Supplies	03/29/16	4,585,877	2,793,427	1,792,450	(4,805,790)	3,013,340	N/A	-	[5]
YBT Industries Inc	04/12/16	12,477,305	6,407,979	6,069,327	(10,845,555)	4,776,228	N/A	-	[5]
Naki Cleaning Services	04/12/16	6,287,403	4,182,342	2,105,061	(4,462,483)	2,357,422	N/A	-	[5]
Anglo China	04/27/20	1,597,595	-	1,597,595	(1,757,355)	159,760	N/A	-	[5]
B & T Group Total		92,965,340	71,517,843	21,447,497	(0)	69,897,231	77%	91,344,728	
Colorado Homes	02/05/18	24,533,701	21,212,640	3,321,061	(4,252,726)	20,581,824	105%	19,650,160	[4] *
United by ECH	08/26/19	3,532,525	2,155,603	1,376,922	1,537,726	2,924,149	50%	5,838,797	*
CNP Operating	11/04/19	-	93,000	(93,000)	4,480,000	-	0%	4,387,000	[4]
Colorado Sky	02/22/19	1,200,000	1,235,000	(35,000)	(445,000)	480,000	N/A	-	[6]
Dickinson Wright	01/30/19	1,200,000	-	1,200,000	(1,320,000)	120,000	N/A	-	[7]
Colorado Homes Group Total		30,466,226	24,696,243	5,769,983	0	24,105,974	81%	29,875,957	
Big Red Express (Big Red Ltl)	10/10/17	5,990,665	4,941,182	1,049,483	6,176,781	11,725,988	62%	18,952,252	*
Bulova Technologies	03/26/14	5,714,985	4,905,683	809,302	(5,027,611)	4,218,309	N/A	-	[8]
Twiss Cold Storage	04/26/16	1,630,505	1,072,904	557,601	(1,149,169)	591,568	N/A	-	[9]
Big Red Express Group Total		13,336,156	10,919,769	2,416,386	0	16,535,865	87%	18,952,252	
Kingdom Logistics	08/01/18	31,097,243	27,785,333	3,311,910	-	17,604,689	84%	20,916,599	*
National Brokers Of America	05/07/15	35,313,398	36,993,310	(1,679,912)	-	36,973,530	105%	35,293,618	*
Grand Total		\$ 203,178,362	\$ 171,912,498	\$ 31,265,864	\$	165,117,289	84%	\$ 196,383,154	

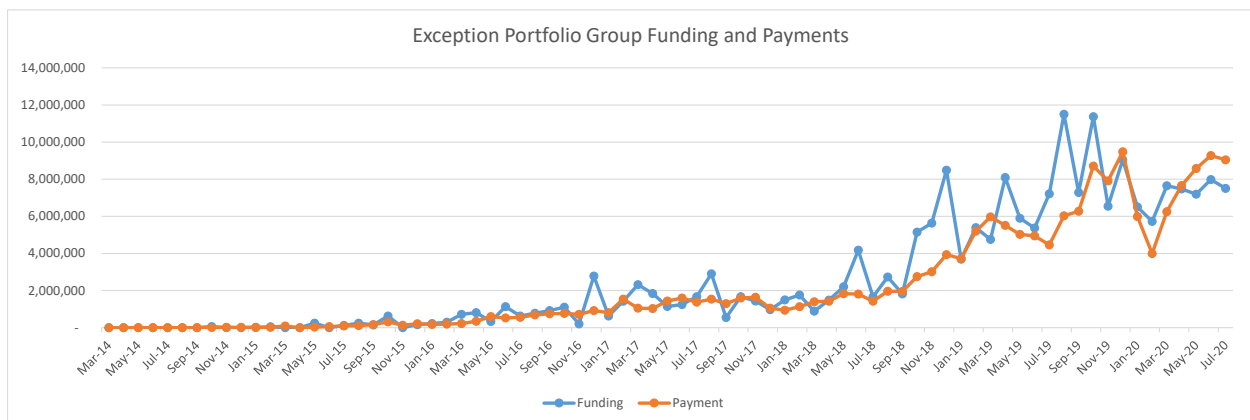
1. Start of Relationship is defined as the date of the first signed contract.
2. Net Cash Exposure is defined as Cash Out minus Cash Back.
3. Outstanding Fees and Other Charges is defined as Outstanding Balance less Net Cash Exposure.
4. Outstanding Balance includes reloads from entities not currently listed here.
5. Entity reloaded outstanding advances into B&T Supply and/or Lifeguard and does not currently have an outstanding balance
6. Entity reloaded outstanding advances into CNP Operating and does not currently have an outstanding balance
7. Entity reloaded outstanding advances into Colorado Sky and does not currently have an outstanding balance
8. Entity reloaded outstanding advances into Big Red Express and does not currently have an outstanding balance
9. Entity reloaded outstanding advances into Bulova Technologies and does not currently have an outstanding balance

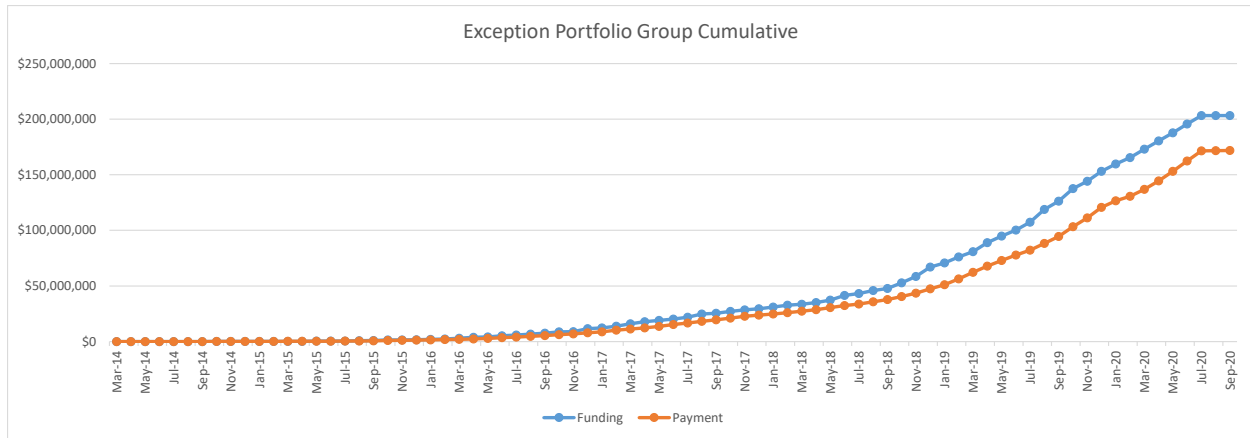
25. Based on our analysis of the Exception Portfolio, we reached the following conclusions with respect to the quality of the CBSG portfolio.

- a. It appears that the Exception Portfolio has excessive reloads with 84% of the outstanding balance made up of the “factor,” fees and expenses and not actual cash advanced. The majority of the advances in this portfolio have been reloaded into new advances, not paid in full.
- b. If CBSG is only able to collect the Cash Exposure (cash out less cash back) in the Exception Portfolio, CBSG’s assets will decline by \$165.1 million reducing the total accounts receivable portfolio by 42% from \$391.8 million, down to \$226.7 million.

- c. The CBSG portfolio is highly concentrated with the 16 merchants in 5 related groups in the Exception Portfolio representing more than 50% of the total \$391.8 million accounts receivable on the books of CBSG.
- d. Based on the data reviewed to date on several merchants in the Exception Portfolio, it appears that the payments received by CBSG were a result of funds actually advanced by CBSG to the merchant. In other words, the funds advanced by CBSG to the merchants made a “round trip” back to CBSG to meet the required payments.
- e. Since March 2014, the cumulative amount collected from the above 16 merchants (“Cash Back”) is \$31.3 million less than the Net Advanced, or “Cash Out” amount in the above table. In other words, for these 16 merchants, representing more than 50% of the portfolio, CBSG has advanced \$31.3 million more in cash than it has received.

26. The following charts show a timeline of Total Funding and Payment activities of the Exception Portfolio, by month and cumulatively:



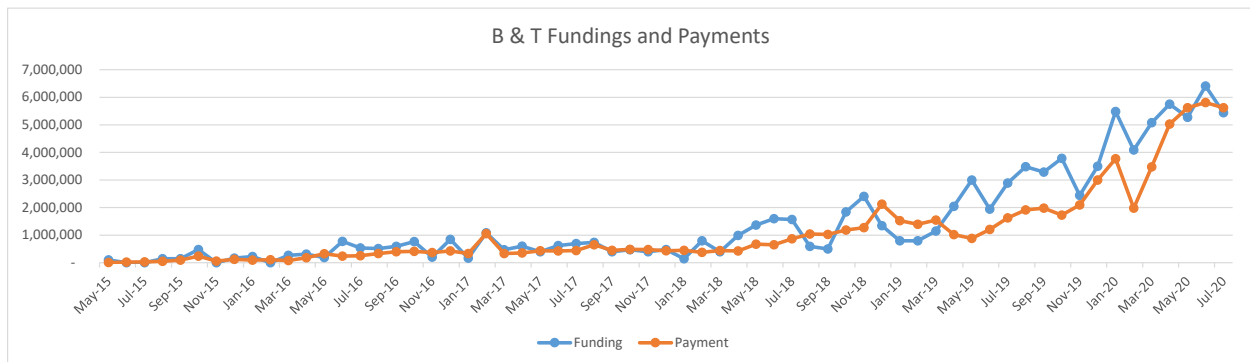


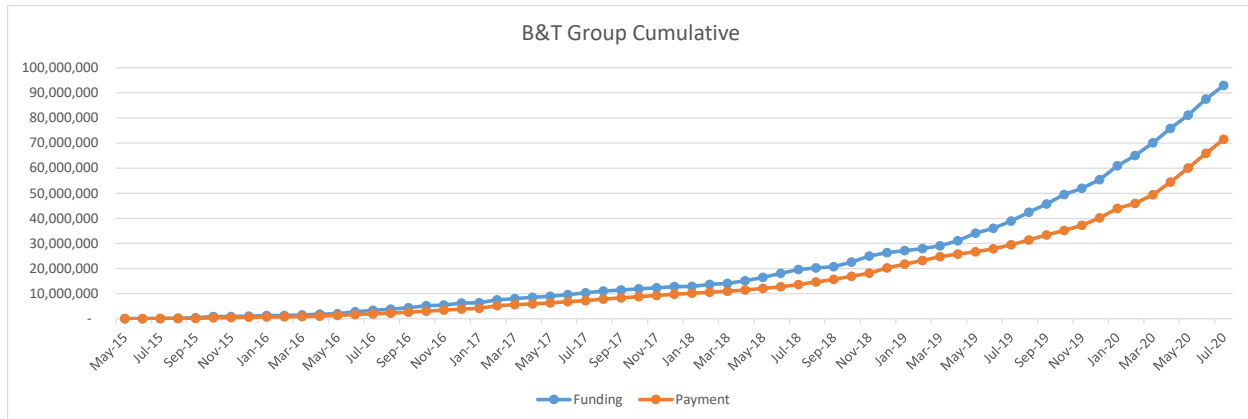
27. As is clear in the second graph above, throughout its relationship with these merchants, the payments received by CBSG never exceeded the amount advanced to these merchants, let alone return a profit. In our analysis, this gap between Cash Out and Cash In has not shown any sign of narrowing on an aggregate basis.

The Exception Merchants

B & T Supply Group:

28. Funding to and payments by B & T Supply Group, by month and cumulatively:





29. As illustrated above, the cash funding to the B&T Supply Group exceeds the cash repaid by more than \$21.4 million with a total outstanding balance due of more than \$91 million, consisting primarily of the “factor”, fees and expenses.

30. The documents in the files of CBSG with respect to this merchant do not support credit exposure of more than \$20 million and certainly not more than \$90 million. CBSG’s own Underwriting Profile dated May 12, 2015 recommended a credit limit of \$27,600. There is no information in the CBSG books and records with respect to the other B&T related entities although these entities received advances.

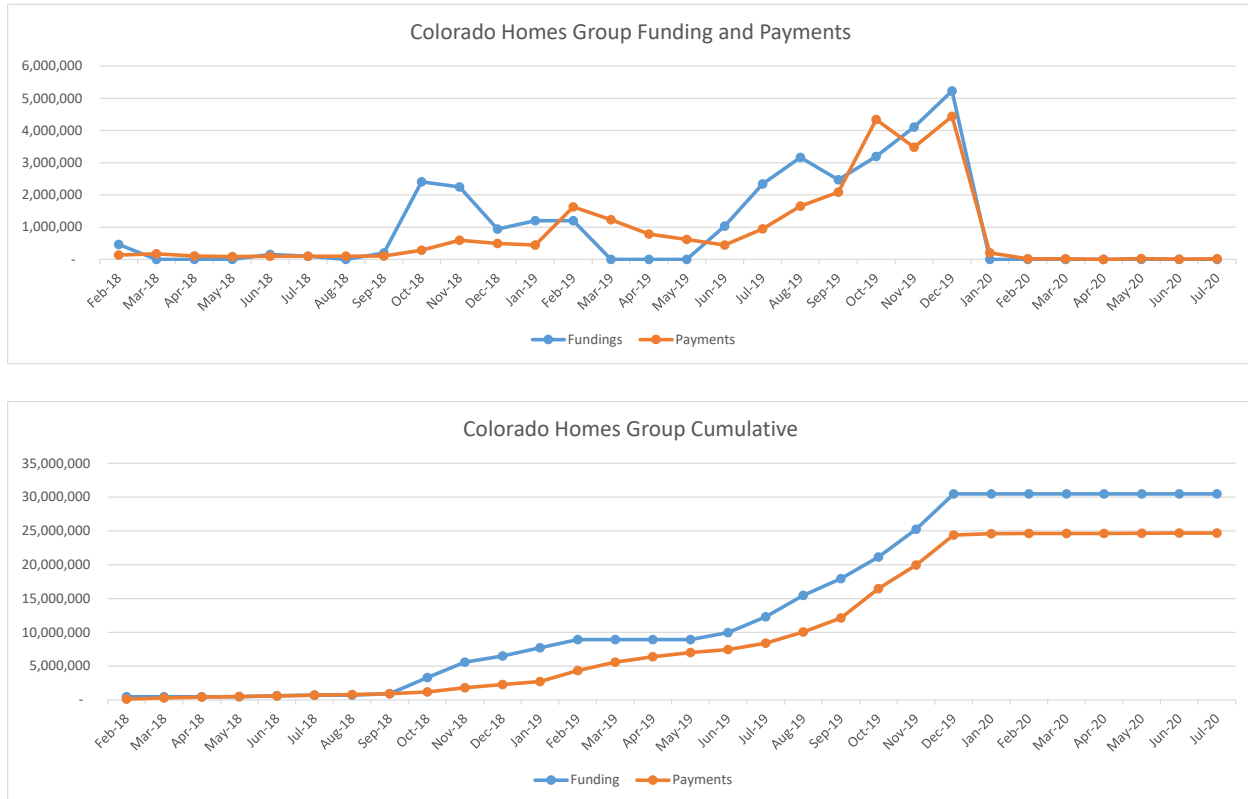
31. The only financial information we have located with respect to this merchant are 20 bank statements for 3 different accounts from 2015 and 2017. When combined, the monthly average balance on these accounts does not exceed \$1 million. From January to June 2020, CBSG funded a monthly average of \$5.3 million to the B&T entities and received average monthly payments of only \$4.3 million.

32. Based on this information, it appears that this merchant has been making its payments to CBSG with funding provided by CBSG.

33. B&T has engaged counsel and its counsel has disputed the amount owed.

Colorado Homes:

34. Funding to and payments by Colorado Homes Group, by month and cumulatively:



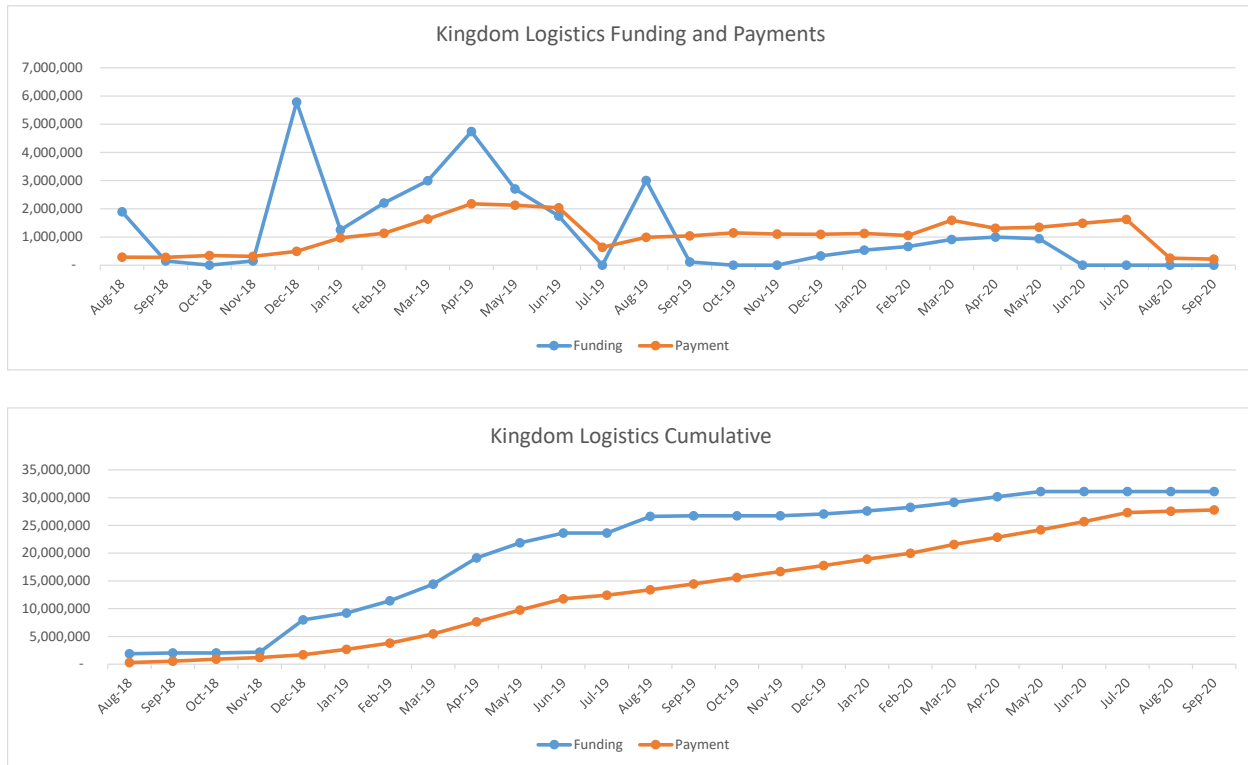
35. The last funding to the Colorado Homes Group was \$5.2 million in December 2019.

36. Since funding ceased, the Colorado Homes Group has only repaid \$297,000. The funding and payment pattern with Colorado Homes is similar to that with B&T. Colorado Homes has been advanced more cash than it has repaid and appears to have been making payments with funding provided by CBSG.

37. Colorado Homes has engaged counsel and has disputed the amount owed. Colorado Homes has stated that the insiders of Par Funding, specifically entities owned by Lisa McElhone, are not fulfilling funding commitments.

Kingdom Logistics:

38. Funding to and Payments by Kingdom Logistics, by month and cumulatively:



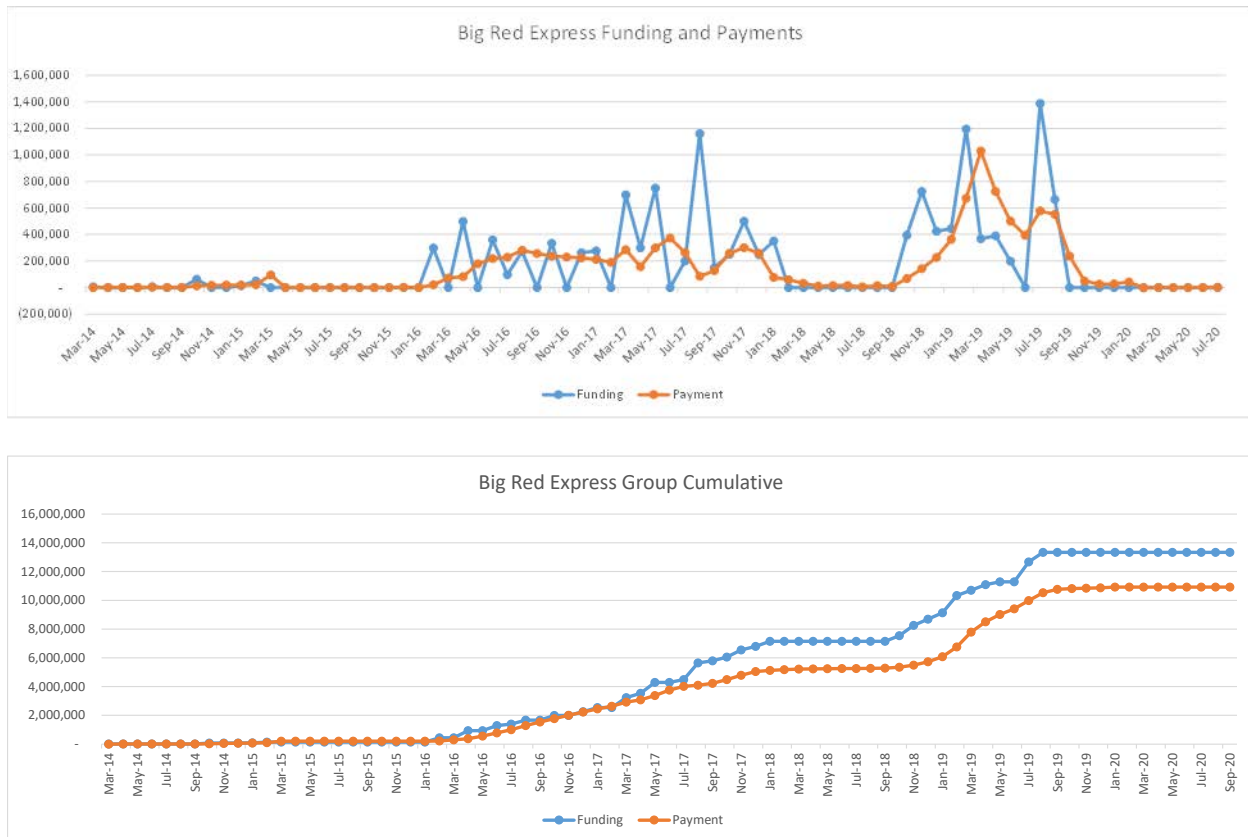
39. As illustrated above, CBSG’s cash funding to Kingdom Logistics exceeds the cash repaid by \$3.3 million with a total outstanding balance due of more than \$20.9 million. This total outstanding balance is comprised primarily of “factor,” fees and expenses. CBSG last funded this merchant with \$3.0 million in August 2019. The merchant made payments of \$12,000 per day until September 28, 2020, when it closed its bank account funding the payments.

40. Anthony Zingarelli, a former contractor for CBSG and an associate of Joe LaForte purports to speak for Kingdom Logistics. We have demanded a resumption of payments but have not received a response.

Big Red Express:

41. Funding to and payments by Big Red Express Group, by month and

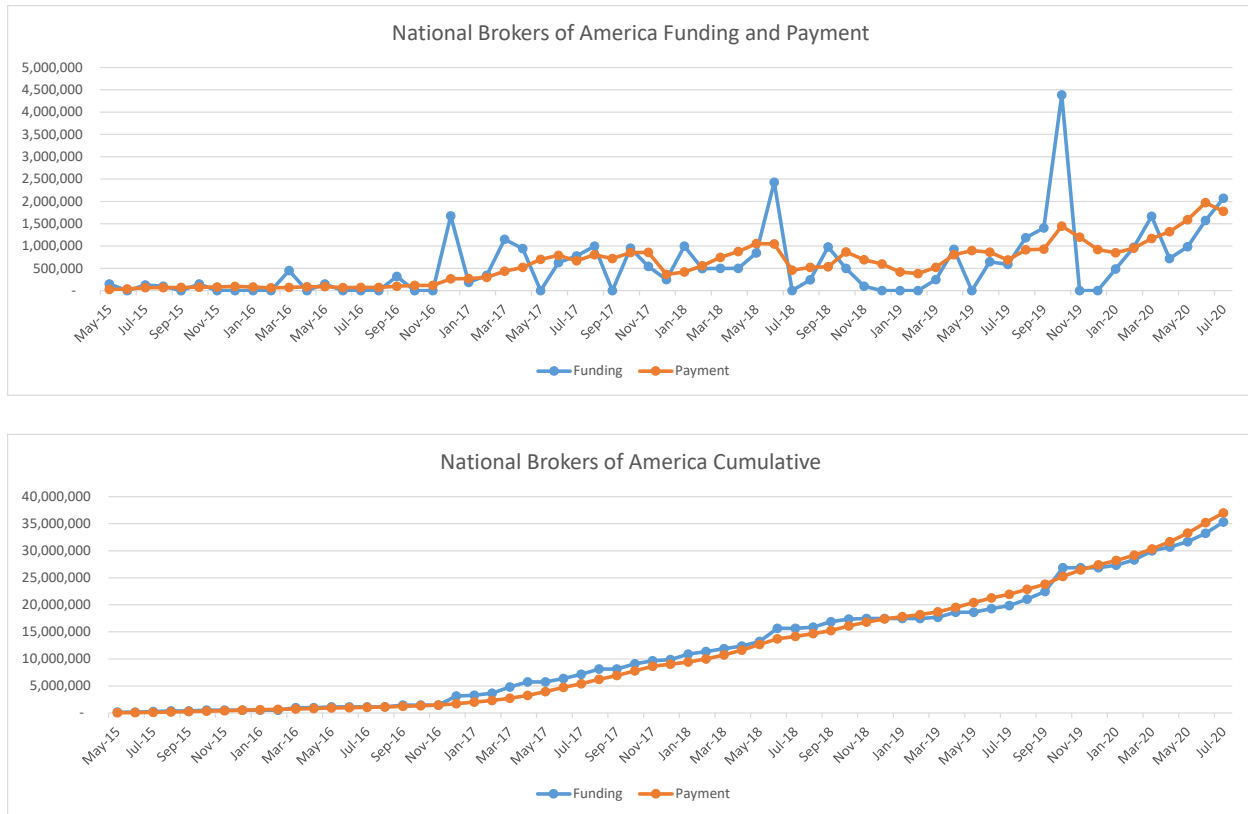
cumulatively:



42. Based on the cash funding and payment history, it appears that Big Red was only able to make payments to CBSG with funding from CBSG. Prior to the Receivership, CBSG filed a confession of judgment against Big Red for \$20,875,197.06 in state court in Pennsylvania. The estate of Big Red's owner has also filed suit in Pennsylvania state court alleging forgery and fraud in CBSG's dealings with Big Red.

National Brokers of America:

43. Funding to and payments by National Brokers of America, by month and cumulatively:



44. National Brokers of America is the only merchant in the Exception Portfolio to repay the amount of cash advanced. CBSG advanced \$35.3 million since May 2015 and was repaid \$36.7 million. However, the Outstanding Balance is still \$35.4 million, consisting exclusively of the “factor,” fees and expenses. The five-year cumulative net cash inflow of \$1.4 million is only 4.76% of total amount advanced. Considering the time value of money and CBSG’s own cost of capital, National Brokers of America is not a source of profit for CBSG.

45. CBSG’s most recent merchant agreement lists an entity, National Brokers of America LLC with a D/B/A of Bene Markets LLC. The original party to the merchant agreements, National Brokers of America, Inc. filed a Chapter 7 Bankruptcy on September 7, 2019 (Case No. 19-15488, Eastern District of Pennsylvania). There is also no listing of any debts owed to CBSG in the bankruptcy filings and no reference of Bene Markets LLC.

46. The most recent credit report in the files of CBSG for National Brokers of America LLC in October 2018 estimates annual sales of in the range of \$1 to \$499,000 and reported a credit limit recommendation of \$1,900.

Par Financial Model

47. As a part of the analysis discussed above, I have reviewed Defendants' Joint Response to the Status Report [ECF Doc No.355]. Based on my analysis of the operations of CBSG, the Joint Response is misleading.

48. For instance, Defendants present a table assuming three hypothetical MCA deals. However, this table assumes that Par collects all the amount due with a factor of 1.32. Based on our experience with the Exception Portfolio, which represents more than 50% of the total Accounts Receivable, Par has only collected 86% of the actual cash Funding, not 132%. In order to continue with the same level of Funding for Deal 2 and Deal 3 as indicated in the table, Par would need to raise additional investor funds.

49. To restate the table presented in the pleading based on actual results:

	Deal 1	Deal 2	Deal 3
Funding	\$100,000.00	\$132,000.00	\$174,240.00
Factor	1.32	1.32	1.32
Collected (86% of funding)	\$86,000.00	\$113,520.00	\$149,846.40
New Investor Money Required	\$14,000.00	\$18,480.00	\$24,393.60
Initial Outstanding Balance	\$132,000.00	\$174,240.00	\$229,996.80
Remaining Outstanding Balance	\$46,000.00	\$60,720.00	\$80,150.40

50. The New Investor Money Required represents additional cash above the amount collected required to fund the next Deal as illustrated below:

Funding	\$100,000.00	\$132,000.00	\$174,240.00
Previous Cash Collected		\$86,000.00	\$113,520.00
New Investor Money Required	\$100,000.00	\$46,000.00	\$60,720.00

51. CBSG's requirement for new investor money in the example above does not include additional cash needs for expenditures such as:

- a. Interest paid to investors (\$51.7 million in 2019)
- b. Operating expenses (\$7.7 million in 2019)
- c. "Consulting fees" previously paid to the Par insiders equal to 10% of the Funding Amount (\$77.0 million).

52. When these factors are considered, CBSG's need for new investor funding would be substantially higher.

53. Based on our review to date, it is apparent that CBSG would not have been able to continue to provide payments to investors, or to continue to operate, without additional funds from investors.

I declare under penalty of perjury that the foregoing is true, correct, and made in good faith.

Executed this 13th day of December 2020 in San Juan Capistrano, California



Bradley D. Sharp