

**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 THIRD MOTION TO EXPAND
RECEIVERSHIP ESTATE AND MOTION TO CORRECT SCRIVENER'S
ERRORS IN PRIOR ORDERS EXPANDING RECEIVERSHIP ESTATE**

Ryan K. Stumphauzer, Esq., as Receiver over the Receivership Entities¹ (the "Receiver"), hereby files his Third Motion to Expand the Receivership Estate and Motion to Correct Prior Orders Expanding Receivership Estate (the "Motion"), and states:

¹ The "Receivership Entities" are 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; 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; MK Corporate Debt Investment Company LLC; Capital Source 2000, Inc.; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consulting, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; Liberty Eighth Avenue LLC; and The LME 2017 Family Trust; and the receivership also includes the properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; and 107 Quayside Dr., Jupiter FL 33477.

INTRODUCTION

Through its previous Orders, the Court appointed Ryan K. Stumphauzer as Receiver over Par Funding and various of the other corporate Defendants in this litigation. In subsequent Orders, the Court expanded the scope of the receivership to include within its scope three (3) residential properties owned by Defendants Lisa McElhone and Joseph LaForte in Haverford, Pennsylvania, Paupack, Pennsylvania, and Jupiter, Florida that were acquired with comingled proceeds of the fraud scheme detailed in the Plaintiff's Amended Complaint. The Court also expanded the receivership to include as additional Receivership Entities, among others, several real estate entities that Defendant Lisa McElhone formed to purchase income-producing properties with commingled proceeds of the fraud scheme.

Through this Motion, the Receiver respectfully requests that the Court expand the scope of the Receivership to include two (2) limited liability companies that serve as the record owners for the residences of Defendants Lisa McElhone and Joseph LaForte in Haverford, Pennsylvania (Blue Valley Holdings, LLC) and Paupack, Pennsylvania (LWP North LLC), and one (1) additional real estate entity that Ms. McElhone formed to purchase an income-producing property with commingled proceeds of the fraud scheme (500 Fairmount Avenue, LLC). The Receiver also requests the Court to correct scrivener's errors in the names of two entities that were previously included within the scope of the receivership through the Court's prior Orders. Specifically, the correct name of Eagle Six Consulting, Inc. is Eagle Six Consultants, Inc., and the correct name of ABFP Multi-Strategy Fund 2 LP is ABFP Multi-Strategy Investment Fund 2 LP.

Because the grounds upon which the Receiver seeks to expand the receivership to include Blue Valley Holdings, LLC and LWP North LLC are the same as those upon which the Court entered its Order Granting Motion to Expand Receivership Estate dated December 16, 2020, ECF

No. 436, and the properties those entities own are already included as part of the receivership, Defendants Lisa McElhone and Joseph Laforte have indicated that they do not oppose this Motion to the extent it seeks to include those entities as additional Receivership Entities. Defendants McElhone and Laforte, who filed a Notice of Appeal of the December 16th Order, further indicated that they would agree to the filing of a Lis Pendens against the property owned by 500 Fairmount Avenue, LLC during the pendency of their appeal of that Order, but do not consent to an expansion of the receivership to include 500 Fairmount Avenue, LLC as one of the Receivership Entities.

Defendants Lisa McElhone and Joseph LaForte have also confirmed that they do not oppose this Motion to the extent it seeks to correct the name of Eagle Six Consulting, Inc. to Eagle Six Consultants, Inc. Further, Defendant Dean Vagnozzi has confirmed that he does not oppose this Motion to the extent it seeks to correct the name of ABFP Multi-Strategy Fund 2 LP to ABFP Multi-Strategy Investment Fund 2 LP. Thus, the only disputed issue before the Court is whether 500 Fairmount Ave LLC should be included as one of the Receivership Entities.

Accordingly, the Receiver requests the Court to enter an Order: (1) expanding the receivership to include Blue Valley Holdings, LLC, LWP North LLC, and 500 Fairmount Avenue LLC as additional Receivership Entities; (2) to correct the name of Eagle Six Consulting, Inc., one of the Receivership Entities, to Eagle Six Consultants, Inc.; and (3) to correct the name of ABFP Multi-Strategy Fund 2 LP, one of the Receivership Entities, to ABFP Multi-Strategy Investment Fund 2 LP.

PROCEDURAL HISTORY AND FACTUAL BACKGROUND

On July 24, 2020, the Securities and Exchange Commission (“SEC”) filed a Complaint for Injunctive and Other Relief in the United States District Court for the Southern District of Florida

alleging that Defendants committed multiple violations of federal securities laws.² On July 27, 2020, the Court appointed Mr. Ryan K. Stumphauzer as Receiver over the Receivership Entities, their subsidiaries, successors, and assigns.³ The Court issued the Amended Order Appointing Receiver over the Receivership Entities on August 13, 2020.⁴

On October 31, 2020, the Receiver filed a Motion to Expand Receivership Estate.⁵ On November 18, 2020, certain Defendants filed Defendants' Joint Response in Opposition to Receiver's Motion to Expand Receivership Estate.⁶ On December 1, 2020, the Receiver filed his Reply in Support of Motion to Expand receivership Estate.⁷ The Court entertained argument on the Motion to Expand at a Status Conference on December 15, 2020, and, thereafter, entered its Order Granting Motion to Expand Receivership Estate on December 16, 2020.⁸

In the Order Expanding Receivership, the Court expanded the receivership to include the following three (3) residences of Defendants Lisa McElhone and Joseph LaForte within the scope of the receivership: 568 Ferndale Lane, Haverford PA 19041 (the "Haverford Property"); 105 Rebecca Court, Paupack, PA 18451 (the "Paupack Property"); and 107 Quayside Dr., Jupiter, FL 33477. The Court granted the expansion of the receivership to include these properties because "tainted funds, which could be the subject of disgorgement, may be found in" these properties. Order Expanding Receivership, at 2. As referenced in the Motion to Expand, the Haverford

² ECF No. 1, the "Complaint." On August 11, 2020, the SEC filed an Amended Complaint, which corrected a scrivener's error in the name of the Relief Defendant and identified the Trustees of the Relief Defendant (Defendants Lisa McElhone and Joseph La Forte). (ECF No. 119, the "Amended Complaint").

³ ECF No. 36, the "Receivership Order."

⁴ ECF No. 114, the "Amended Order."

⁵ ECF No. 357, the "Motion to Expand."

⁶ ECF No. 401, the "Opposition to Motion to Expand."

⁷ ECF No. 414, the "Order Expanding Receivership."

⁸ ECF No. 436, the "Order on Motion to Expand."

Property⁹ and the Paupack Property¹⁰ are each owned by limited liability companies. Although the Court determined it was appropriate to expand the receivership to include those properties, the Receiver requests that the two entities that own these properties also be included within the scope of the receivership. This will allow the Receiver with full access to the financial records and other information pertaining to the ownership of these properties, and will also facilitate the Receiver's exercise of exclusive control and authority over the properties.

The Court also expanded the scope of the Receivership to include as additional Receivership Entities, among others, 19 real estate entities that Defendant Lisa McElhone utilized to purchase 26 income-producing properties with commingled proceeds of the fraud scheme detailed in the SEC's Amended Complaint. The Court granted the expansion of the receivership to include these entities because "tainted funds, which could be the subject of disgorgement, may be found in" these entities. Order Expanding Receivership, at 2. The Receiver has identified one additional real estate entity, 500 Fairmount Avenue, LLC, through which Defendant McElhone similarly purchased a mixed-use apartment building at 500 Fairmount Avenue, Philadelphia, Pennsylvania, with commingled proceeds of the fraud scheme. *See* Declaration of Timothy M. Hazel dated January 8, 2021, a copy of which is attached as Exhibit 1, at ¶¶ 5-11.

In addition, in the Receiver's Expedited Motion to Expand Scope of Receivership to Include Additional Receivership Entities and to Require Dean Vagnozzi to Return Funds (ECF No. 236), there was a scrivener's error in the name of one of the entities that the Receiver requested

⁹ "The Haverford Property was purchased by Blue Valley Holdings, LLC in or around August 2016 for the price of \$2,445,000.00. Blue Valley Holdings was formed on February 26, 2007, by Lisa McElhone." Motion to Expand at 18.

¹⁰ "The Paupack Property was purchased by LWP North LLC, in or around August 2017 for the price of \$2,600,000.00. . . . The LME Trust is listed as the member of the grantee LLC, at the same address as LWP North" LLC and CBSG. Motion to Expand at 18-19.

to be included as one of the additional Receivership Entities. Specifically, ABFP Multi-Strategy Investment Fund 2 LP was incorrectly listed as ABFP Multi-Strategy Fund 2 LP. In the Court's Order Granting the Receiver's Expedited Motion to Expand Scope of Receivership to Include Additional Receivership Entities and to Require Dean Vagnozzi to Return Funds (ECF No. 238), the Court included the same scrivener's error when referring to ABFP Multi-Strategy Investment Fund 2 LP. The Receiver requests the Court to correct this scrivener's error.

Finally, in the Order on Motion to Expand, ECF No. 436, the Court expanded the receivership to include Eagle Six Consulting, Inc. As a result of a scrivener's error in the Motion to Expand, this entity should have correctly been identified as Eagle Six Consultants, Inc. The Receiver also requests the Court to correct this scrivener's error.

LEGAL STANDARD

Federal courts have the "inherent equitable authority to issue a variety of 'ancillary relief' measures in actions brought by the SEC to enforce the federal securities laws." *SEC v. Safety Finance Service, Inc.*, 674 F.2d 368, 372 (5th Cir. 1982) (citation omitted). That includes the appointment of a receiver as part of a court's "broad power to remedy violations of federal securities laws." *SEC v. Byers*, 609 F.3d 87, 92 (2d Cir. 2010). Once appointed, the receiver acts as an officer of the court. *SEC v. Elliott*, 953 F.2d 1560, 1577 (11th Cir. 1992). The Receiver refers to his Motion to Expand for additional authority on this standard. *See* ECF No. 357, at 3-5.

ARGUMENT

Because the legal arguments supporting the expansion of the receivership to include Blue Valley Holdings, LLC, LWP North LLC, and 500 Fairmount Avenue, LLC as additional receivership entities are duplicative of those the Receiver previously advanced in the Motion to Expand, the Receiver refers the Court to those arguments. *See* ECF No. 357, at 11-16 (requesting

expansion of receivership to include entities owning income-producing properties as receivership entities) and 18-20 (requesting expansion of receivership to include residences of Defendants McElhone and LaForte, including the Haverford Property and the Paupack Property).

Additionally, the Court has already concluded that ABFP Multi-Strategy Investment Fund 2 LP and Eagle Six Consultants, Inc. should be included as Receivership Entities. *See* ECF No. 238; ECF No. 436. Because of scrivener's errors in the Receiver's motions seeking the expansion of the receivership to include these entities as Receivership Entities, the Orders referred to those entities as ABFP Multi-Strategy Fund 2 LP and Eagle Six Consulting, Inc. Courts, of course, have the authority to enter subsequent orders to clarify or correct scrivener's errors. *See Stanley v. United States*, 587 F. Supp. 1071 (S.D. Fla. 1984); *Allen v. Goard*, 0:14-CV-61147-WPD, 2017 WL 5203000, at *1 (S.D. Fla. May 18, 2017) (granting motion to correct scrivener's error in referencing the proper parties). Accordingly, the Receiver requests the Court to enter an Order correcting the names of these Receivership Entities so they are referred to by their correct names.

Defendants McElhone and LaForte have confirmed that they do not oppose the expansion of the receivership to include Blue Valley Holdings, LLC and LWP North LLC as additional Receivership Entities. Further, Defendants McElhone and LaForte indicated that they would agree to the filing of a Lis Pendens against the property owned by 500 Fairmount Avenue, LLC during the pendency of their appeal of the Expansion Order, but do not consent to an expansion of the receivership to include 500 Fairmount Avenue, LLC as one of the Receivership Entities. Finally, Defendants McElhone and LaForte have confirmed that they do not oppose this Motion to the extent it seeks to correct the name of Eagle Six Consulting, Inc. to Eagle Six Consultants, Inc., and Defendant Vagnozzi has confirmed that he does not oppose this Motion to the extent it seeks to correct the name of ABFP Multi-Strategy Fund 2 LP to ABFP Multi-Strategy Investment Fund 2

LP. Thus, the only disputed issue before the Court is whether 500 Fairmount Ave LLC should be included as one of the Receivership Entities.

CONCLUSION

For the reasons set forth herein, the Receiver respectfully requests that the Court enter an order: (1) expanding the receivership to include Blue Valley Holdings, LLC, LWP North LLC, and 500 Fairmount Avenue, LLC as additional Receivership Entities; (2) correcting the Court's prior Order, ECF No. 238, so that ABFP Multi-Strategy Fund 2 LP, one of the Receivership Entities, is properly referred to as ABFP Multi-Strategy Investment Fund 2 LP; and (3) correcting the Court's prior Order, ECF No. 436, so that Eagle Six Consulting, Inc., one of the Receivership Entities, is properly referred to as Eagle Six Consultants, Inc. A proposed Order granting this relief is attached as Exhibit 2.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with counsel of record for all parties who may be impacted by the relief sought through this Motion and certifies that:

- (1) Defendants Lisa McElhone and Joseph Laforte do not oppose the Receiver's request to expand the receivership to include Blue Valley Holdings, LLC and LWP North LLC as additional Receivership Entities;
- (2) Defendants Lisa McElhone and Joseph Laforte do not consent to an expansion of the receivership to include 500 Fairmount Avenue, LLC as one of the Receivership Entities;
- (3) Defendants Lisa McElhone and Joseph LaForte do not oppose the Receiver's request to correct the name of Eagle Six Consulting, Inc. to Eagle Six Consultants, Inc.; and
- (4) Defendant Dean Vagnozzi does not oppose the Receiver's request to correct the name of ABFP Multi-Strategy Fund 2 LP to ABFP Multi-Strategy Investment Fund 2 LP.

Dated: January 14, 2021

Respectfully Submitted,

**STUMPHAUZER FOSLID SLOMAN
ROSS & KOLAYA, PLLC**

Two South Biscayne Blvd., Suite 1600
Miami, FL 33131
Telephone: (305) 614-1400

By: /s/ Timothy A. Kolaya

TIMOTHY A. KOLAYA
Florida Bar No. 056140
tkolaya@sflaw.com

Co-Counsel for Receiver

**PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP**

1818 Market Street, Suite 3402
Philadelphia, PA 19103
Telephone: (215) 320-6200

By: /s/ Gaetan J. Alfano

GAETAN J. ALFANO
Pennsylvania Bar No. 32971
(Admitted Pro Hac Vice)
GJA@Pietragallo.com

DOUGLAS K. ROSENBLUM
Pennsylvania Bar No. 90989
(Admitted Pro Hac Vice)
DKR@Pietragallo.com

Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 14, 2021, 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,

Plaintiff,

v.

CASE NO.: 20-cv-81205-RAR

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

Defendants.

DECLARATION OF TIMOTHY M. HAZEL

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

1. My name is Timothy M. Hazel. I am over twenty-one years of age and have personal knowledge of the matters set forth herein.

2. I am a lawyer that is licensed to practice law in the State of Ohio and the Commonwealth of Pennsylvania. I focus my practice on the area of real estate law. I am also a real estate broker that is licensed (on inactive status) in the Commonwealth of Pennsylvania Real Estate Commission. I am a partner in the law firm of Pietragallo Gordon Alfano Bosick & Raspanti LLP (the “**Firm**”), counsel to Receiver, Ryan K. Stumphauzer (the “**Receiver**”).

3. I have overseen the Firm’s analysis and tracking certain matters connected with Complete Business Solutions Group, Inc. d/b/a Par Funding (“**CBSG**”) and related Receivership entities (collectively, the “**Receiver Entities**”) relating to the Receivership Entities’ acquisition, ownership and divesture of real estate assets.

4. I have access to CBSG’s books and records and the work product of business consultants and accountants that have been engaged by the Receiver to analyze CBSG’s books and records.

5. This declaration provides my findings with respect to my analysis of the ownership and source of funds used to acquire a certain property that is commonly known as 500 Fairmount Avenue, Philadelphia Pennsylvania 19123.

Conclusion:

6. Based upon my review of the records of the Pennsylvania Secretary of State, 500 Fairmount Avenue LLC is a Pennsylvania limited liability company that was formed by Lisa McElhone and has a registered office at 205 Arch Street, 2nd Floor, Philadelphia, Pennsylvania 19106, which is the address of CBSG's offices ("**500 LLC**").

7. Based upon my review of the Philadelphia County, Pennsylvania property tax and real estate records, the property that is known as 500 Fairmount Avenue, Unit 39, Philadelphia Pennsylvania, being tax parcel 05-6148950 ("**500 Fairmount**"), was purchased by 550 LLC on or about January 24, 2020 for consideration in the amount of \$1,640,000.00.

8. Based upon my review of certain CBSG's books and records, approximately one week preceding 500 LLC's purchase of 500 Fairmount, CBSG transferred two payments to Eagle Six Consultants ("**ESC**") from an account containing commingled proceeds of the fraud scheme totaling \$2,740,000.00 (the "**CBSG/ESC Transfer**").

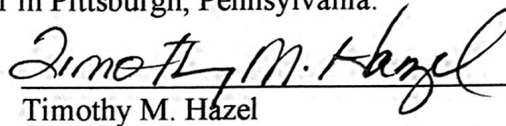
9. Based upon my review of certain CBSG's books and records, on January 24, 2020, ESC transferred \$1,617,682.60 to City Abstract, LLC, a real estate settlement company (the "**ESC/Settlement Company Transfer**").

10. Based upon my review of certain of CBSG's books and records, ESC contributed an additional \$50,000.00 toward 500 LLC's purchase of 500 Fairmount by way of transferring the \$50,000.00 to City Abstract, LLC on January 9, 2020 to fund the deposit for the purchase of 500 Fairmount (the "**ESC Deposit**").

11. Based upon my review of a Settlement Statement (HUD-1) dated January 24, 2020, signed by Lisa McElhone, Sole Member, 500 Fairmount Avenue, LLC and City Abstract, LLC, City Abstract, LLC utilized the funds generated by the ESC/Settlement Company Transfer and the ESC Deposit toward 500 LLC's purchase of the 500 Fairmount.

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

Executed this the 8th day of January 2021 in Pittsburgh, Pennsylvania.



Timothy M. Hazel

Exhibit “2”

**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.

_____ /

**ORDER GRANTING RECEIVER RYAN K. STUMPHAUZER'S THIRD
MOTION TO EXPAND RECEIVERSHIP ESTATE AND MOTION TO CORRECT
SCRIVENER'S ERRORS IN PRIOR ORDERS EXPANDING RECEIVERSHIP ESTATE**

THIS CAUSE comes before the Court upon the Receiver's Third Motion to Expand Receivership Estate and Motion to Correct Scrivener's Errors in Prior Orders Expanding Receivership Estate [ECF No. ____], filed on January 14, 2021. In the Motion, the Receiver seeks to expand the scope of the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] ("Receivership Order"), which has been previously amended by this Court's order dated September 4, 2020 [ECF No. 238] and the Order Granting Motion to Expand Receivership Estate dated December 16, 2020 [ECF No. 436] ("Order on Motion to Expand").¹

¹ The current "Receivership Entities" are 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; 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; MK Corporate Debt Investment Company LLC; Capital Source 2000, Inc.; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle

The Court finds that the Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

ORDERED AND ADJUDGED that the Receiver's Third Motion to Expand Receivership Estate and Motion to Correct Scrivener's Errors in Prior Orders Expanding Receivership Estate [ECF No. ____] is **GRANTED** as follows:

1. For the same reasons articulated in the Order on Motion to Expand [ECF No. 436], the scope of the receivership created in this case is expanded to include the following entities:

- a. Blue Valley Holdings, LLC;
- b. LWP North LLC; and
- c. 500 Fairmount Avenue, LLC.

2. The name of ABFP Multi-Strategy Fund 2 LP, one of the Receivership Entities, is corrected to ABFP Multi-Strategy Investment Fund 2 LP.

3. The name of Eagle Six Consulting, Inc, one of the Receivership Entities, is corrected to Eagle Six Consultants, Inc.

4. The Court finds that based upon the Securities and Exchange Commission's previous filings and the information the Receiver has supplied in the Motion, the same findings and conclusions that led the Court to include the other Receivership Entities apply equally to those listed in paragraphs 1 through 3 above. Ryan K. Stumphauzer is appointed Receiver of all entities

Six Consulting, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; Liberty Eighth Avenue LLC; and The LME 2017 Family Trust; and the receivership also includes the properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; and 107 Quayside Dr., Jupiter FL 33477.

listed in paragraphs 1 through 3 above and all the “Receivership Assets” of those entities, as defined in the Receivership Order [ECF No. 141]. The Receivership Order shall apply with equal force and effect to the entities listed in paragraphs 1 through 3 above as it applies to the other Receivership Entities. The terms and provisions of the operative Receivership Order are incorporated by reference herein.

DONE AND ORDERED Fort Lauderdale, Florida, this ____ day of _____, 2021.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record