

**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  
INTENT TO SELL WATERCRAFT AND VEHICLES**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,<sup>1</sup> by and through his undersigned counsel, hereby files this Notice of Intent to Sell Watercraft and Vehicles (the “Notice”), and states as follows:

---

<sup>1</sup> 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; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment 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 Consultants, 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; The LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; and LM Property Management LLC; and the Receivership also includes the

1. On or about July 27, 2020, the Court appointed the Receiver as receiver for Par Funding and other associated entities. *See* Order Appointing Receiver [ECF No. 36]. On December 16, 2020, the Court entered an Order Granting Motion to Expand Receivership Estate, expanding the receivership over, among other entities, Heritage Business Consulting, Inc. (“HBC”). *See* Order Granting Motion to Expand Receivership Estate [ECF No. 436].

2. HBC owns, among other assets, the following vehicles:

- a. 2020 Mercedes-Benz G Class, Vehicle Identification Number WDCYC6BJ3LX334144 (the “Mercedes”); and
- b. 2016 Bentley Mulsanne, Vehicle Identification Number SCBBG7ZH8GC002175 (the “Bentley”).

3. On March 8, 2021, the Court entered an Order Granting Receiver's Motion to Expand Receivership Estate to Include a Custom Cherubini Yacht, a Manitou XT Pontoon Boat, and Two Yamaha Waverunners (the “Watercraft Expansion Order”) [ECF No. 508]. Through the Watercraft Expansion Order, the Court included the following assets within the scope of the Receivership:

- a. Custom-built Cherubini Yachts Classic 24, purchased pursuant to the Contract to Purchase dated as of November 20, 2017 (the “Cherubini”);
- b. 2019 Manitou Xplode XT pontoon boat, Hull Identification Number TII48245D919 (the “Manitou”);
- c. 2018 Yamaha GP 1800 waverunner, Hull Identification Number YAMA2206C818 (the “Yamaha GP”); and

---

properties located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr., Jupiter FL 33477; 2413 Roma Drive, Philadelphia, PA 19145.

- d. 2018 Yamaha FX Limited SVHO waverunner, Hull Identification Number YAMA1900C818 (the “Yamaha FX”).

4. On March 21, 2021, the Court entered an Order Granting Motion to Expand Receivership to Include Roma Drive Property, Vehicles, and Artwork (the “Vehicle Expansion Order”) [ECF No. 517]. Through the Vehicle Expansion Order, the Court included, among others, the following assets within the scope of the Receivership:

- a. the 2016 Chevrolet Tahoe that Defendant Lisa McElhone purchased from Armen Chevrolet on December 1, 2016, Vehicle Identification Number 1GNSKCKC6GR417471 (the “Tahoe”); and
- b. the 2020 Range Rover that Defendant Lisa McElhone purchased from ROVMAIN INC on August 7, 2019, Vehicle Identification Number SALGS2SE4LA572113 (the “Range Rover”).

5. As stated in the Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141], the Receiver is provided with the following general powers and duties:

To use reasonable efforts to determine the nature, location and value of all property interests of the Receivership Entities, including, but not limited to, monies, funds, securities, credits, effects, goods, chattels, lands, premises, leases, claims, rights and other assets, together with all rents, profits, dividends, interest or other income attributable thereto, of whatever kind, which the Receivership Entities own, possess, have a beneficial interest in, or control directly or indirectly (“Receivership Property” or, collectively, “Receivership Estates”)[.]

Amended Order Appointing Receiver ¶ 7(A).

6. Additionally, the Amended Order Appointing Receiver provides:

The Receiver may, without further Order of this Court, transfer, compromise, or otherwise dispose of any Receivership Property, other than real estate, in the ordinary course of business, on terms and in the manner the Receiver deems most beneficial to the Receivership Estate, and with due regard to the realization of the true and proper value of such Receivership Property.

Amended Order Appointing Receiver ¶ 37.

7. The Receiver is currently storing and maintaining the Cherubini, Manitou, Yamaha GP, and Yamaha FX (collectively, the “Watercraft”), as well as the Mercedes, Bentley, Tahoe, and Range Rover (collectively, the “Vehicles”), which are depreciating assets.

8. The Receiver deems it most beneficial to the Receivership Estate to sell the Watercraft and the Vehicles, as the sales of these depreciating assets and the associated elimination of any continuing storage and maintenance costs will maximize the value of the Receivership Estate.

9. Accordingly, pursuant to his powers under Paragraph 37 of the Amended Order Appointing Receiver, the Receiver hereby provides notice that he intends to sell the Watercraft and the Vehicles through private sales, with due regard to the realization of the true and proper value of this Receivership Property. The sales of the Watercraft and the Vehicles will occur no earlier than 14 calendar days after the date of this Notice.

10. The Receiver is filing this Notice solely to provide notice to potential buyers that the Receiver is authorized to sell the Watercraft and the Vehicles free and clear of any and all liens, claims, interests and encumbrances.

#### **CONCLUSION**

**WHEREFORE**, the Receiver provides notice of his intent to sell the Watercraft and the Vehicles.

Dated: June 15, 2021

Respectfully Submitted,

**STUMPHAUZER FOSLID SLOMAN  
ROSS & KOLAYA, PLLC**  
Two South Biscayne Blvd., Suite 1600  
Miami, FL 33131  
Telephone: (305) 614-1400  
Facsimile: (305) 614-1425

By: /s/ Timothy A. Kolaya  
TIMOTHY A. KOLAYA  
Florida Bar No. 056140  
tkolaya@sfsflaw.com

*Co-Counsel for Receiver*

**PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP**  
1818 Market Street, Suite 3402  
Philadelphia, PA 19103  
Telephone: (215) 320-6200  
Facsimile: (215) 981-0082

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 June 15, 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