

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

**CASE NO. 20-CIV-81205-RAR**

**SECURITIES AND EXCHANGE  
COMMISSION,**

Plaintiff,

v.

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

Defendants.

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**ORDER GRANTING RECEIVER’S MOTION TO LIFT  
LITIGATION INJUNCTION AS TO CERTAIN COUNTERPARTIES IN DEFAULT**

**THIS CAUSE** comes before the Court upon the Receiver, Ryan K. Stumphauzer’s, Motion to Lift Litigation Injunction as to Certain Counterparties in Default Under Agreements with Eagle Six Consultants, Inc. and Heritage Business Consulting, Inc. [ECF No. 635] (“Motion”), filed on June 29, 2021.

Through this Motion, the Receiver seeks to modify the Court’s Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141], so as to lift the litigation injunction provided for in that Order to allow the Receiver, on behalf of Eagle Six Consultants, Inc. (“ESC”) and Heritage Business Consulting, Inc. (“HBC”), two of the Receivership Entities, to pursue claims against the counterparties under certain promissory notes, loan agreements, and other similar obligations with ESC or HBC (“Agreements”), as well as certain of the guarantors under these various Agreements and the collateral and security the Counterparties provided to ESC or HBC under these Agreements.

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 Motion is **GRANTED**. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] is hereby lifted so as to allow the Receiver to pursue claims, as he deems appropriate, against the following counterparties, as well as certain of the guarantors under the various Agreements and the collateral and security these counterparties provided to ESC or HBC:

1. Claims by ESC:
  - a. Akers Nanotechnology Inc.
  - b. Bushwick Beer Garden LLC
  - c. Circadian Funding LLC
  - d. Joseph Lanni Living Trust
  - e. Nxgen Brands LLC
  - f. Platinum Rapid Funding Group Ltd.
  - g. Structured Financing Source LLC
  - h. Ticket Guru, LLC
  - i. Vanguard Corporate Solutions, LLC
  - j. WF 7627 Germantown LLC
2. Claims by HBC:
  - a. Cardinal Equity LLC
  - b. Fundrite, LLC
  - c. Investquest Partners, Inc.
  - d. John Mulvihill
  - e. Ticket Guru, LLC
  - f. Webtec Holding Corporation
  - g. The Wilson Firm, Inc.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 6th day of July, 2021.

A handwritten signature in black ink, appearing to read 'Rodolfo A. Ruiz II', written over a horizontal line.

**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**