

**UNITED STATES DISTRICT COURT  
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.

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**ORDER GRANTING RECEIVER’S MOTION TO LIFT LITIGATION INJUNCTION  
AS TO CERTAIN COUNTERPARTIES WITH EAGLE SIX CONSULTANTS, INC.  
AND HERITAGE BUSINESS COUNSULTING, INC.**

**THIS CAUSE** comes before the Court upon the Receiver, Ryan K. Stumphauzer’s, Motion to Lift Litigation Injunction as to Certain Counterparties with Eagle Six Consultants, Inc. and Heritage Business Consulting, Inc. [ECF No. 871] (“Motion”), filed on October 26, 2021.

Through this Motion, the Court-Appointed Receiver, Ryan K. Stumphauzer (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 (the “Agreements”), or who otherwise received funds from ESC or HBC, 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 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 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, the collateral and security these Counterparties provided to ESC or HBC, or for any funds wrongfully received or retained from ESC or HBC by the Counterparties:

1. Claims by ESC:
  - a. Rainer & Lloyd Associates LLC
2. Claims by HBC:
  - a. Nuco Tech Designs, Inc.
  - b. Cascades of Colorado, Inc.
  - c. AveNew Funding LLC
  - d. Mark Lowenstein
  - e. Christopher Payne
  - f. Jonathan Fry

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 27th day of October, 2021.



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

Copies to: Counsel of record