

**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 CLARIFICATION
REGARDING (1) [ECF NO. 699] FOURTH APPLICATION FOR ALLOWANCE
AND PAYMENT OF PROFESSIONALS’ FEES AND REIMBURSEMENT OF
EXPENSES AND (2) [ECF NO. 948] FIFTH APPLICATION FOR ALLOWANCE AND
PAYMENT OF PROFESSIONALS’ FEES AND REIMBURSEMENT OF EXPENSES**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through undersigned counsel, hereby files his Notice of Clarification Regarding

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; 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

the Receiver's: (1) Fourth Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for April 1, 2021 – July 31, 2021 [ECF No. 699] (the "Fourth Application"); and (2) Fifth Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for July 1, 2021 - September 30, 2021 [ECF No. 948] (the "Fifth Application"), and states as follows:

1. On August 16, 2021, the Receiver filed his Fourth Application. The Receiver correctly noted in the Docket Text when filing the Fourth Application in CM/ECF that it covered the time period of April 1, 2021 through **June 30, 2021**. In the filed document, however, as a result of a scrivener's error, the Receiver inadvertently indicated in the title of the document and the introductory paragraph that the Fourth Application covered the time period of April 1, 2021 through **July 31, 2021**.

2. On August 26, 2021, the Court entered an Order Granting the Receiver's Fourth Application. As a result of the Receiver's scrivener's error in the Fourth Application, however, the Court's Order similarly noted that the Fourth Application covered the time period of April 1, 2021 through **July 31, 2021**.

3. As reflected in the supporting time records and other documentation in the Fourth Application, the Fourth Application only covers the time period of April 1, 2021 through **June 30, 2021**, and the Receiver did not request through the Fourth Application payment of professionals' fees or reimbursement of expenses for the period of July 1, 2021 through July 31, 2021.

Processing LLC; and LM Property Management LLC; and the Receivership also includes the 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.

4. On November 15, 2021, the Receiver filed his Fifth Application. The Fifth Application correctly notes that it covers the period of time from July 1, 2021 through September 30, 2021.

5. Accordingly, the Receiver files this notice to clarify that there is no overlap or duplication between the payment of professionals' fees and reimbursement of expenses the Receiver previously requested in the Fourth Application and what the Receiver is currently requesting in the Fifth Application.

Dated: November 16, 2021

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 16, 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