

**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.

**ORDER GRANTING RECEIVER’S FIFTH APPLICATION FOR ALLOWANCE AND  
PAYMENT OF PROFESSIONALS’ FEES AND REIMBURSEMENT OF EXPENSES  
FOR JULY 1, 2021 – SEPTEMBER 30, 2021**

**THIS CAUSE** comes before the Court upon Receiver Ryan K. Stumphauzer’s Fifth Application for Allowance and Payment of Professionals’ Fees and Reimbursement of Expenses for July 1, 2021 – September 30, 2021 [ECF No. 948] (“Application”), filed on November 15, 2021.<sup>1</sup> The Court has reviewed the Application and is otherwise fully advised.

This is a complex receivership involving the operation of a merchant cash advance business with a current receivable balance of over \$400 million, and a group of investors that are seeking, collectively, more than \$300 million dollars from the company. The Receiver and his professional team are managing numerous operational issues involving more than 1,300 merchants that are parties to merchant cash advance agreements with Par Funding. The Application and

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<sup>1</sup> The Court notes that the Receiver’s Fourth Application for Allowance and Payment of Professionals’ Fees [ECF No. 699] contained a scrivener’s error, whereby the time period covered by the Application was April 1, 2021 through July 31, 2021. The Court entered its Order Granting the Receiver’s Fourth Application [ECF No. 734] as such. However, as reflected in the supporting time records and other documentation, the Fourth Application and Order only covered the payment of fees and reimbursements for the period of April 1, 2021 through June 30, 2021. [ECF No. 956].

records submitted by the Receiver reflect that the Receiver and his professional team have reasonably and diligently discharged their duties.


The Receiver's tasks in this case have included negotiating with Par Funding's merchants in an effort to reach settlements of MCA account balances; employing consultants to oversee and manage Par Funding; pursuing various claims against non-parties that may generate additional income to the Receivership Estate; assuming responsibilities over various residential and commercial properties; responding to issues and document requests related to pending litigation and investigations involving the Receivership Entities; communicating with the Defendants and responding to discovery requests; and drafting status reports for the Court.

In performing these tasks, among others, the Receiver and his professional team have provided a significant benefit to the Receivership Estate, investors, and creditors at rates that the Court finds reasonable. Accordingly, it is hereby

**ORDERED AND ADJUDGED** that the Application [ECF No. 948] is **GRANTED** as follows:

Professional Fees:	\$1,949,536.25
Expenses:	\$137,757.21
<b>TOTAL:</b>	<b>\$2,087,293.46</b>

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 17th day of November, 2021.

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