

**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.

**ORDER GRANTING RECEIVER’S MOTION TO LIFT LITIGATION INJUNCTION
AS TO CERTAIN COUNTERPARTIES IN DEFAULT UNDER AGREEMENTS WITH
COMPLETE BUSINESS SOLUTIONS GROUP, INC.**

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 Complete Business Solutions Group, Inc. (“CBSG”) [ECF No. 1112] (“Motion”), filed on December 22, 2021.

Through this Motion, the Court-Appointed Receiver, Ryan K. Stumphauzer (“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 for the limited purpose of allowing the Receiver to execute upon existing judgments and/or to pursue claims against certain counterparties in default under Merchant Cash Advance Agreements (“Agreements”) with CBSG.

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 any collateral and security these counterparties provided to CBSG:

1. Judgments for Execution:
 - a. Grant's Wrecker Service Inc.
 - b. Edge Industries Inc. d/b/a Edge Industries d/b/a Cutters Edge
 - c. F and M Property Developing Inc. d/b/a F and M Property and Development d/b/a Frontier Properties
 - d. USA United Pest Control of SW FL Inc.
 - e. Merita Health, LLC d/b/a Premier Medical Care, LLC d/b/a Addiction Recovery Clinics of Ohio d/b/a Meritra Clinics, LLC d/b/a Meritra Primary Care/Walk In Clinic d/b/a Access Medical Group d/b/a John Y Robertson Family Medicine, Inc. d/b/a Robertson Abad Family Medicine
 - f. Hom Enterprises LLC d/b/a Aldo Zampieri
 - g. Concession Management Group, LLC d/b/a Concession Management Group
 - h. Special Entertainment Events Inc.
 - i. Surya Hotel LLC d/b/a Surya Hotel d/b/a Hotel Royal
 - j. Road Service 1 Inc. d/b/a Road Service 1
 - k. MEP Nationwide LLC d/b/a MEP Nationwide
 - l. BNJ Trucking LLC d/b/a BNJ Trucking
 - m. Kandela Design LLC d/b/a Kandela Design
 - n. IBN Global Consulting
 - o. All Dressed Up LLC d/b/a All Dressed Up
 - p. B J Oil, Inc. d/b/a Chevron
 - q. Born of Earth Spa LLC d/b/a Born of Earth Spa d/b/a Born of Earth
 - r. Boston Logistics LLC d/b/a Boston Logistics
 - s. Cogent Medical Lab LLC d/b/a Cogent Medical Lab d/b/a Cogent Medical Laboratory LLC

- t. Engineered Systems and Equipment Inc. d/b/a Engineered Systems and Equipment d/b/a Engineered Systems & Equipment d/b/a ESE
 - u. Christopher Ernie Perez Jr. Sole Proprietor d/b/a Forza Group
 - v. J.D.M. Medical, Inc. d/b/a JDM Medical Inc. d/b/a JDM Medical
 - w. MTS Express
 - x. New Image Construction of New Jersey, Inc. d/b/a New Image Construction of New Jersey
 - y. Oakbend Enterprises Inc. d/b/a Maaco of Athens d/b/a Maaco Auto Painting & Body Work d/b/a Maaco America's Bodyshop d/b/a Maaco Collision Repair and Auto Painting d/b/a Elite Auto Collision d/b/a Maaco Auto Paint and Collision
 - z. Usfood Union LLC d/b/a Usfood Union d/b/a Duck N Bao d/b/a Duck N Bao Katy
 - aa. Structural Solutions of NJ LLC d/b/a Structural Solutions of NJ
 - bb. Your Cause Auto Services LLC d/b/a Your Cause Auto Services
 - cc. Ridgeway Trailer Company Inc. d/b/a Ridgeway Trailer Company d/b/a Ridgeway Trailer Co.
 - dd. CPC Construction LLC
 - ee. Commercial Management Company LLC d/b/a CMC Inc.
 - ff. LBG Enterprises LLC d/b/a Lighting by Gregory
 - gg. Ro Fro Yo LLC d/b/a Jimmy Johns d/b/a RFY Eton LLC d/b/a RFY Niles LLC d/b/a Ro Fro Yo LLC Steelyard d/b/a Ro Fro Yo LLC E 4th d/b/a Blue Falcon Subs d/b/a ZS Subs Co.
 - hh. Charlie and Terrie Inc. d/b/a Charlies Sports Bar
 - ii. Dayne Property Management Group Inc. d/b/a Beacon Light Construction d/b/a New Era Realty NYS Inc. d/b/a La Fe Construction
 - jj. Richard G Gaskin Sole Proprietor d/b/a Middle G Cattle Company LLC
 - kk. Dilworth Market Ventures LLC d/b/a Dilworth Market Ventures d/b/a The Peoples Market
 - ll. LMR Custom Home Construction, LLC d/b/a LMR Custom Home Construction d/b/a LMR Construction d/b/a LMR Construction Management d/b/a LMR Construction Contractors d/b/a LMR Construction Companies d/b/a LMR Construction Building Contractors
 - mm. Allen Sandberg d/b/a Allen Sandberg Vending
2. Pursuit of claims, including confessing judgment, where appropriate:
- a. Bresciani Hay Co Inc. d/b/a Bresciani Hay Co d/b/a Bresciani Hay Company Inc.

- b. Maryland Performance Diesel LLC d/b/a Maryland Performance Diesel
- c. Frank Wadan LLC d/b/a Value Auto Sales
- d. AAH Homes, LLC d/b/a AAH Homes LLC d/b/a AAH Homes
- e. Elevate Roofing and Construction LLC
- f. American Construction Pros Inc. d/b/a American Construction Pros
- g. Apollo HP Inc.
- h. Antolio Renzio, Sole Proprietor d/b/a AR Sandblasting
- i. B and H Underground LLC d/b/a B and H Underground
- j. Baileys Construction and Plumbing Inc. d/b/a Baileys Construction and Plumbing d/b/a Baileys Construction & Plumbing
- k. Blue City Construction Corp. d/b/a Blue City Construction
- l. Vadim Baranski, Sole Proprietor d/b/a Lockdown Alarm Systems
- m. M Burton Marshall, Sole Proprietor d/b/a Miles B Marshall d/b/a M Burton Marshall
- n. Med Life LLC d/b/a Pace Medical Transport
- o. Fenix Health LLC d/b/a Fenix Health
- p. Uncle Ricks Diesel and Auto LLC d/b/a Mt. Vernon Automotive d/b/a Uncle Ricks Performance Auto Repair
- q. New Beginnings Transport Inc. d/b/a New Beginnings Transport
- r. Ascension Pharmacy Holdings LLC d/b/a Mermaid RX d/b/a Lemberg's Pharmacy d/b/a G.L. Management Group Inc.
- s. NAVS, PLLC d/b/a NAVS PLLC

DONE AND ORDERED in Fort Lauderdale, Florida, this 22nd day of December, 2022.



RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record