

**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 IN DEFAULT UNDER AGREEMENTS WITH  
COMPLETE BUSINESS SOLUTIONS GROUP, INC.**

**THIS CAUSE** comes before the Court upon the Receiver’s Motion to Lift Litigation Injunction as to Certain Counterparties in Default Under Agreements with Complete Business Solutions Group, Inc. [ECF No. 1144] (“Motion”), filed on February 9, 2022.

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 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 to allow the Receiver to pursue claims and execute

upon judgments, 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:

- a. Conavenca Freight Forwarder LLC d/b/a Conavenca Freight Forwarder d/b/a Conavenca
- b. Integrity HVAC Mechanical LLC d/b/a Integrity HVAC Mechanical
- c. IGB Express Corp. d/b/a IGB Express
- d. Black Rock Ready Mix LLC d/b/a Black Rock Ready Mix
- e. Advantage Trading LLC d/b/a Advantage Trading
- f. Enterprise Motors Corp. d/b/a Enterprise Motors Corp.
- g. La Roose Catering Hall Inc. d/b/a La Roose Catering Hall
- h. Luxury Vacations and Cruises, Inc. a/k/a Luxury Vacations and Cruises Personalized Services Luxury Vacations & Cruises
- i. Redco Pallet, Inc. d/b/a Redco Pallet
- j. Saygan Global Steel, Ltd. d/b/a SG Steel Ltd d/b/a Saygan Global Steel
- k. Renee Ann Omatz (Sole Proprietor) d/b/a Renees Cards Gifts and Flowers d/b/a Renees Flowers
- l. Economics & Family, Inc. d/b/a Economics & Family
- m. Swift Recycling LLC d/b/a Swift Recycling
- n. Wide Open Kustomz LLC d/b/a Wide Open Kustomz

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 9th day of February, 2022.

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

Copies to: Counsel of Record