

**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, Ryan K. Stumphauzer’s, Motion to Lift Litigation Injunction as to Certain Counterparties in Default Under Agreements with Complete Business Solutions Group, Inc. [ECF No. 1164] (“Motion”), filed on February 23, 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 pursue claims against certain counterparties in default under Merchant Cash Advance 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:

Pursuit of claims, including confessing judgment, where appropriate:

- a. JNR Flooring, Inc.
- b. Karen Fritzson LTD D/B/A Karen Fritzson LTD D/B/A Dovecote Accounting Services D/B/A Harvid Funding Corp.
- c. Trinity Security Services Atl LLC D/B/A Trinity Security Services Atl
- d. Greater Pacific Realty Corp D/B/A Greater Pacific Realty D/B/A GPR D/B/A Pacific Holdings Partnership D/B/A Pacific Holdings Group
- e. Maxforce Delivery Service LLC
- f. Port City Body Shop Tahlequah, Inc.
- g. Ninos Auto Sales #1, Inc.
- h. Humbert Construction, Inc.
- i. BBR Logistics, LLC
- j. Fritts Electric Company LLC D/B/A Fritts Solar Company

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 23rd day of February, 2022.



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

Copies to: Counsel of Record