

**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.

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**RECEIVER’S NOTICE OF COMPLIANCE WITH ORDER ON  
RECEIVER’S EXPEDITED MOTION TO EXPAND THE RECEIVERSHIP  
TO INCLUDE 19 COUNTRY DRIVE, MORRISTOWN, NJ 07960**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,<sup>1</sup> by and through undersigned counsel, hereby files this Notice of Compliance with the

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<sup>1</sup> The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding (“Par Funding”); Full Spectrum Processing, Inc.; 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; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy 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 Consulting, 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; 500 Fairmount Avenue, LLC; Liberty Eighth Avenue LLC; Blue Valley Holdings, LLC; LWP North LLC; The LME 2017 Family Trust; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; and LM Property Management LLC, and the receivership also includes the properties located at 568

Court's Order [ECF No. 1182] (the "Order") on Receiver's Expedited Motion to Expand Receivership to Include 19 Country Drive, Morristown, NJ 07960 [ECF No. 1180] ("Motion to Expand").

On March 10, 2022, the Court entered the Order. In paragraph 3 of the Order, the Court directed the Receiver to perform the following:

3. By no later than **March 17, 2022**, the Receiver shall file a notice with the Court confirming that he has served a copy of the Motion, this Order, and the Receivership Order upon Daniel Scaramellino and the registered agent for One Nine Country Drive, LLC, the entity that is the record owner of the Property, indicating the date of service.

(Order, ¶ 3.)

On March 10, 2022, the Receiver served a copy of these documents by email on Daniel Scaramellino, through his counsel. A copy of this email is attached as Exhibit "1." Additionally, counsel for Daniel Scaramellino previously appeared in this action on December 30, 2021 (*see* ECF No. 1119) and, therefore, was served with a copy of the Order on March 10, 2022, via transmission of a Notice of Electronic Filing generated by CM/ECF.

Additionally, on March 11, 2022, the Receiver sent a FedEx package containing a letter and copies of these documents to Michael Scaramellino, as the Registered Agent for One Nine Country Drive, LLC. The Receiver sent the letter and documents to the registered agent name and address listed on the corporate records for One Nine Country Drive, LLC, available on the website of the Florida Department of State, Division of Corporations. The documents were delivered/served on March 14, 2022. A copy of this letter, along with the FedEx confirmation of delivery, is attached as Exhibit "2."

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Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr., Jupiter FL 33477; and 2413 Roma Drive, Philadelphia, PA 19145.

Accordingly, the Receiver has complied with the requirements of paragraph 3 of the Court's Order.

Dated: March 14, 2022

Respectfully Submitted,

**STUMPHAUZER FOSLID SLOMAN  
ROSS & KOLAYA, PLLC**  
Two South Biscayne Blvd., Suite 1600  
Miami, FL 33131  
Telephone: (305) 614-1400  
Facsimile: (305) 614-1425

By: /s/ Timothy A. Kolaya  
TIMOTHY A. KOLAYA  
Florida Bar No. 056140  
[tkolaya@sfsflaw.com](mailto:tkolaya@sfsflaw.com)

*Co-Counsel for Receiver*

**PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP**  
1818 Market Street, Suite 3402  
Philadelphia, PA 19103  
Telephone: (215) 320-6200  
Facsimile: (215) 981-0082

By: /s/ Gaetan J. Alfano  
GAETAN J. ALFANO  
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[GJA@Pietragallo.com](mailto:GJA@Pietragallo.com)  
DOUGLAS K. ROSENBLUM  
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(Admitted Pro Hac Vice)  
[DKR@Pietragallo.com](mailto:DKR@Pietragallo.com)

*Co-Counsel for Receiver*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 14, 2022, 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

# Exhibit “1”

**From:** [Jessica Albert](#)  
**To:** [Katie B. Hinton](#); [Rich McIntyre](#)  
**Cc:** [Timothy Kolaya](#)  
**Subject:** SEC v. Complete Business Solutions Group, Inc. d/b/a Par Funding, et al., Case No. 20-CIV-81205: Documents Pursuant to Judge Ruiz's Order  
**Date:** Thursday, March 10, 2022 6:30:38 PM  
**Attachments:** [20220309 Mtn to Expand Receivership 19 Country Drive.pdf](#)  
[20220310 Order Signed by J Ruiz.pdf](#)  
[20200731 Order Granting Plaintiff's Motion to Amend Order Appointing Receiver.pdf](#)

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Dear Katie and Rich,

Pursuant to Judge Ruiz's Order entered today, please find the following documents attached to this e-mail:

- Order Granting Plaintiff's Urgent Motion to Amend Order Appointing Receiver to Include Litigation Injunction, filed July 31, 2020;
- Receiver, Ryan K. Stumphauzer's Expedited Motion to Expand the Receivership to Include 19 Country Drive, Morristown, NJ 07960, filed March 9, 2022; and
- Signed Order on Receiver's Expedited Motion to Expand Receivership to Include 19 Country Drive, Morristown, NJ 07960, entered March 10, 2022.

We are serving these documents on you, as counsel for Daniel Scaramellino, pursuant to Paragraph 3 of Judge Ruiz's attached Order. Please acknowledge receipt.

Thank you very much.

Sincerely,



**JESSICA ALBERT**  
ASSOCIATE

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DIRECT	305. 614. 1410
MAIN	305. 614. 1400
FAX	305. 614. 1425
E-MAIL	<a href="mailto:JALBERT@SESLAW.COM">JALBERT@SESLAW.COM</a>
WEB	<a href="http://WWW.SESLAW.COM">WWW.SESLAW.COM</a>

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ONE BISCAYNE TOWER  
2 SOUTH BISCAYNE BOULEVARD  
SUITE 1600  
MIAMI, FL 33131

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This e-mail message is from Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, a law firm, and may contain legally privileged and/or confidential information. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this e-mail message is strictly prohibited. If you have received this message in error, please notify the sender immediately and delete this e-mail message and any attachments from your computer without retaining a copy.

# Exhibit “2”



**Timothy A. Kolaya**  
Telephone: 305. 614. 1405  
[tkolaya@sfsflaw.com](mailto:tkolaya@sfsflaw.com)

March 11, 2022

**VIA FEDERAL EXPRESS**

Michael Scaramellino, Registered Agent  
Michelle Scaramellino, President  
19 Country Drive LLC  
315 SE Mizner Boulevard  
Suite 202  
Boca Raton, Florida 33432

**RE: *Securities & Exchange Commission v. Complete Business Solutions Group, Inc., d/b/a Par Funding, et al., Case Number: 9:20-cv-81205-RAR (S.D. Fla.)***  
**(the "Receivership Action")**

Dear Mr. Scaramellino and Mrs. Scaramellino:

I am counsel for Ryan K. Stumphauzer, Esq., the Court-Appointed Receiver for Complete Business Solutions Group, Inc., Eagle Six Consultants, Inc., and various other entities. Pursuant to Paragraph 3 of the enclosed Order entered in the Receivership Action on March 10, 2022, we are serving these documents on you, as the Registered Agent, Manager, and President for 19 Country Drive LLC:

- Order Granting Plaintiff's Urgent Motion to Amend Order Appointing Receiver to Include Litigation Injunction, filed July 31, 2020;
- Receiver, Ryan K. Stumphauzer's Expedited Motion to Expand the Receivership to Include 19 Country Drive, Morristown, NJ 07960, filed March 9, 2022; and
- Signed Order on Receiver's Expedited Motion to Expand Receivership to Include 19 Country Drive, Morristown, NJ 07960, entered March 10, 2022.

Please feel free to contact our office with any questions.

Sincerely,

\_\_\_\_\_  
Timothy A. Kolaya

Enclosures



ORIGIN ID:MPBA (305) 614-1400  
STUMPHAUZER, FOSLID, SLOMAN  
STUMPHAUZER & SLOMAN  
2 SOUTH BISCAYNE BOULEVARD  
SUITE 1600  
MIAMI, FL 33131  
UNITED STATES US

SHIP DATE: 11MAR22  
ACTWGT: 1.00 LB  
CAD: 109949915/NET4460

BILL SENDER

TO 19 COUNTRY DRIVE LLC  
MICHAEL SCARAMELLINO  
315 SE MIZNER BLVD. SUITE 202

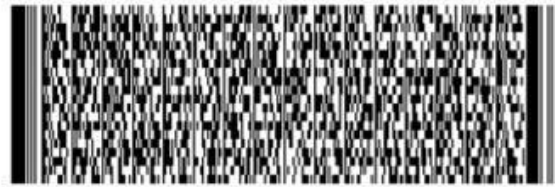
BOCA RATON FL 33432

(305) 614-1400  
INV  
PO

REF: 2020-0554

DEPT

560J6ER0ZFE4A



FedEx  
Express



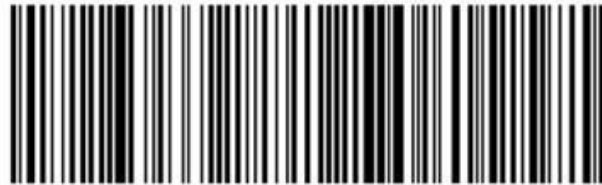
421822108114

MON - 14 MAR 10:30A  
PRIORITY OVERNIGHT

TRK# 7762 7659 1620  
0201

32 PHKA

33432  
FL-US FLL



Dear Customer,

The following is the proof-of-delivery for tracking number: 776276591620

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivered To:</b>	Receptionist/Front Desk
<b>Signed for by:</b>	A.ARIANNA	<b>Delivery Location:</b>	
<b>Service type:</b>	FedEx Priority Overnight		
<b>Special Handling:</b>	Deliver Weekday		BOCA RATON, FL,
		<b>Delivery date:</b>	Mar 14, 2022 09:14

**Shipping Information:**

<b>Tracking number:</b>	776276591620	<b>Ship Date:</b>	Mar 11, 2022
		<b>Weight:</b>	1.0 LB/0.45 KG
<b>Recipient:</b>		<b>Shipper:</b>	
BOCA RATON, FL, US,		Miami, FL, US,	

**Reference** 2020-0554

Signature image is available. In order to view image and detailed information, the shipper or payor account number of the shipment must be provided.

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