

**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.

**RECEIVER, RYAN K. STUMPHAUZER’S TWENTY-FOURTH MOTION TO LIFT
LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities¹, by and through undersigned counsel, hereby files this Twenty-Fourth Motion to lift Litigation Injunction as to Certain Garnishment Proceedings, and states as follows:

¹ 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; LM Property Management LLC; and ALB Management, LLC; and the receivership also includes the properties

I. MOTION TO LIFT LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS

1. The Receiver hereby moves this Court to lift the Litigation Injunction for the limited purpose of allowing the Receiver, in his discretion, to dissolve current writs of garnishment, to mark judgments satisfied, and/or to reopen confessed judgments, where the counterparty merchant either has resolved or has agreed to resolve prior defaults, or otherwise filed for bankruptcy protection, in the following cases in the Court of Common Pleas of Philadelphia County, Pennsylvania.²

2. The cases are:

- a. *Complete Business Solutions Group Inc. d/b/a Par Funding v. Car City Inc. d/b/a Car City and Charles Ives*, Philadelphia Court of Common Pleas Docket No. 200500946.
- b. *Complete Business Solutions Group Inc. d/b/a Par Funding v. Byers Insurance Agency Inc. d/b/a Byers Insurance Agency d/b/a Kellie Byers Agency and Nancy Byers*, Philadelphia Court of Common Pleas Docket No. 200201419.
- c. *Complete Business Solutions Group Inc. d/b/a Par Funding v. Mantis Home Improvement and Property Management LLC d/b/a Mantis Home Improvement and Property Management d/b/a Mantis Home Improvement & Property and Yadira Abreu*, Philadelphia Court of Common Pleas Docket No. 200300142.
- d. *Complete Business Solutions Group Inc. d/b/a Par Funding v. LC Diamonds USA Ltd., Inc. d/b/a LC Diamonds USA Ltd. d/b/a Conscious Diamonds Inc. and Leeron Zion Karioff*, Philadelphia Court of Common Pleas Docket No. 200600243.

located at 568 Ferndale Lane, Haverford PA 19041; 105 Rebecca Court, Paupack, PA 18451; 107 Quayside Dr., Jupiter FL 33477; 2413 Roma Drive, Philadelphia, PA 19145; 159 26th Street, Avalon, NJ 08202; and 164 84th Street, Stone Harbor, NJ 08247.

² See the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] (the "Operative Receivership Order"). The Receiver generally incorporates the background section of his prior Motions to Lift Litigation Injunction as to Certain Garnishment Proceedings. [See, e.g., ECF Nos. 111.]. To conserve resources and promote efficiency, the Receiver is providing only a summary narrative, as approved by the Court at the October 7, 2020 status conference.

- e. *Complete Business Solutions Group Inc. d/b/a Par Funding v. GPN Express Company and Petru Grati*, Philadelphia Court of Common Pleas Docket No. 200300526.
- f. *Complete Business Solutions Group Inc. d/b/a Par Funding v. Park Transportation Inc. d/b/a Park Transportation, Christin Kim and Eric Seo*, Philadelphia Court of Common Pleas Docket No. 200101510.

3. The Receiver has determined, in his professional judgment, that it is in the best interests of the Receivership Estate to dissolve current writs of garnishment, to mark judgments satisfied, and/or to reopen confessed judgments with respect to these cases.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant the motion and lift the Litigation Injunction on a limited basis as set forth above. A proposed order for the Court's consideration is attached as Exhibit 1.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with all counsel of record and unrepresented parties in this matter regarding the relief sought through this motion and certifies that all counsel of record have either (1) not responded to the Receiver's meet and confer requests or (2) confirmed that their clients either do not oppose or take no position with respect to the relief sought. The SEC has confirmed that it does not oppose the Receiver's requests to lift the litigation injunction.

Dated: June 30, 2022

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 30, 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

**UNITED STATES DISTRICT COURT
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CASE NO.: 20-CV-81205-RAR**

SECURITIES AND EXCHANGE
COMMISSION,

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v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a/ PAR FUNDING, et al.,

Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K.
STUMPHAUZER'S TWENTY-FOURTH MOTION TO LIFT
LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS**

THIS CAUSE comes before the Court upon the Receiver's Twenty-Fourth Motion to lift Litigation Injunction as to Certain Garnishment Proceedings [ECF No. ___] ("Motion"), filed on June 30, 2022.

In the Motion, the 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 provided for in that Order for certain garnishment matters currently pending in the Court of Common Pleas of Philadelphia County, Pennsylvania to be opened for the limited purpose to authorize the Receiver, in his discretion, to dissolve current writs of garnishment, to mark judgments satisfied, and/or to reopen confessed judgments, where the counterparty merchant either has resolved, has agreed to resolve prior defaults, or otherwise filed for bankruptcy protection, in certain cases in the Court of Common Pleas of Philadelphia County, Pennsylvania.

The Receiver has made a sufficient and proper showing in support of the relief requested.

Accordingly, it is hereby

ORDERED AND ADJUDGED that Receiver's Motion is **GRANTED** with respect to the relief requested. Specifically, the litigation injunction set forth in the Court's Amended Order Appointing Receiver dated August 13, 2020 [ECF No. 141] is hereby lifted in the following matters in the Court of Common Pleas of Philadelphia County, Pennsylvania, and solely for the purpose as described in the Motion:

- a) *Complete Business Solutions Group Inc. d/b/a Par Funding v. Car City Inc. d/b/a Car City and Charles Ives*, Philadelphia Court of Common Pleas Docket No. 200500946.
- b) *Complete Business Solutions Group Inc. d/b/a Par Funding v. Byers Insurance Agency Inc. d/b/a Byers Insurance Agency d/b/a Kellie Byers Agency and Nancy Byers*, Philadelphia Court of Common Pleas Docket No. 200201419.
- c) *Complete Business Solutions Group Inc. d/b/a Par Funding v. Mantis Home Improvement and Property Management LLC d/b/a Mantis Home Improvement and Property Management d/b/a Mantis Home Improvement & Property and Yadira Abreu*, Philadelphia Court of Common Pleas Docket No. 200300142.
- d) *Complete Business Solutions Group Inc. d/b/a Par Funding v. LC Diamonds USA Ltd., Inc. d/b/a LC Diamonds USA Ltd. d/b/a Conscious Diamonds Inc. and Leeron Zion Karioff*, Philadelphia Court of Common Pleas Docket No. 200600243.
- e) *Complete Business Solutions Group Inc. d/b/a Par Funding v. GPN Express Company and Petru Grati*, Philadelphia Court of Common Pleas Docket No. 20030052.
- f) *Complete Business Solutions Group Inc. d/b/a Par Funding v. Park Transportation Inc. d/b/a Park Transportation, Christin Kim and Eric Seo*, Philadelphia Court of Common Pleas Docket No. 200101510.

DONE AND ORDERED in Fort Lauderdale, Florida, this ____ day of _____,
2022.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record