

**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.

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

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”) or Contract Financing Solutions, Inc. (“CFS”), and to Effectuate a Settlement [ECF No. 1354] (“Motion”), filed on August 10, 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 and/or pursue claims against certain counterparties in default under Merchant Cash Advance Agreements with CBSG or CFS (“Agreements”), and to effectuate a contemplated settlement he will be entering into in connection with certain litigation that is pending in the Sixth Judicial Circuit, in and for Pinellas County, Florida. 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 execute on judgments and/or 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 or CFS:

1. Judgments for Execution:
 - a. Donny Construction
 - b. Crash Services LLC d/b/a Crash Services
 - c. Rowe Enterprizes LLC d/b/a Rowe Enterprizes
 - d. Ann Produce LLC
 - e. Georgia Redevelopment Group LLC d/b/a Georgia Redevelopment Group
 - f. J&J Perlman's Inc. d/b/a Perlman's Towing and Recovery
 - g. Caring Cleaners Industries, Inc. d/b/a Caring Cleaners Industries, Inc.
 - h. Beth Osborn Sole Proprietor d/b/a Precision Finishes
 - i. Gist Group LLC d/b/a Gist Group
 - j. Lady Lake Montessori
 - k. Phoenix Express Inc.
 - l. Harmony Contracting Inc. d/b/a Harmony Contracting Corp.
 - m. W3 Transportation Inc.
 - n. Square Design & Construction LLC d/b/a Square Design & Construction d/b/a Square Design and Construction
 - o. Eva Campbell Inc. d/b/a Eva Campbell d/b/a Delk & Morrison d/b/a Dell & Morrison Showroom
 - p. S and M Marketing Group LLC d/b/a S&M Marketing Group

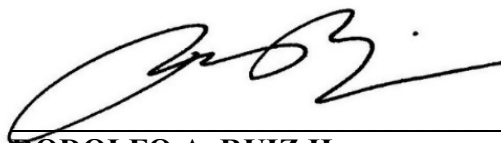
- q. Seed Burger LLC d/b/a Seed Burger
 - r. Pro-Safety Shield Inc. d/b/a Pro-Safety Shield d/b/a Enterprise Logistics
 - s. Interboro Beemers and Benz LLC d/b/a Interboro Beemers and Benz d/b/a Interboro Beemers & Benz
 - t. Southwest Healthcare Solutions d/b/a AAA Home Care in Las Vegas
 - u. David Johnson Sole Proprietor d/b/a Ready Auto Haulers
 - v. Pine Straw Plus LLC d/b/a Pine Straw Plus
 - w. Best Global Vacation Rentals
 - x. Brian Massey Automotive
 - y. Economics & Family Inc. d/b/a Economics & Family
 - z. The Helping Hands Agency Inc.
 - aa. Threadgills Quality Roofing d/b/a TQR d/b/a Gregory Threadgill d/b/a Grant Threadgill
 - bb. Bob Tsacrios Plumbing Inc. d/b/a Bob Tsacrios Plumbing
 - cc. Refined Custom Builders LLC d/b/a Refined Custom Builders
 - dd. Walter P. Dootson Sole Proprietor d/b/a Home Repair Solutions
 - ee. Magnolia Auto Transport d/b/a Smith Motor Co.
 - ff. Arm Transportation Inc. d/b/a Arm Transportation d/b/a The Park at AR
 - gg. Moxiecap Corporation d/b/a Moxiecap Corp.
 - hh. Riley-Sons, Inc. d/b/a Riley-Sons Roofing
2. Pursuit of claims, including confessing judgment, where appropriate:
- a. Leo Glass Installing d/b/a Showers and Custom Mirrors
 - b. Driven EV LLC d/b/a Driven EV
 - c. Roberto A. Gomez Flores d/b/a G and F Wrought Iron

- d. Dr. Kenneth E. Ross DO LLC d/b/a Kenneth E. Ross DO LLC d/b/a Fam Medicine
- e. WJK and Associates LLC d/b/a WJK and Associates
- f. Pho Golden Vietnamese Bar and Grill, Inc. d/b/a Pho Golden d/b/a Pho Golden Bar and Grill
- g. Krave Kobe Franchising LLC d/b/a The Krave Kobe Burger and Grill
- h. BJK Sports LLC
- i. Pho Evergreen Bar and Grill LLC d/b/a Pho Evergreen Bar and Grill d/b/a Pho Golden Vietnamese Bar and Grill
- j. Burnshaw Inc. d/b/a The Learning Place
- k. Cabesen LLC d/b/a Cabesen Group LLC d/b/a Cabesen d/b/a Cabesen Group
- l. William Smith Sole Proprietor d/b/a Heavenly Home Pro
- m. Premier Exterior Solutions Inc. d/b/a Premiere Exterior Solutions
- n. Rare Bird Lit, LLC d/b/a Rare Bird Books, LLC
- o. Dnarpo Electric LLC d/b/a Dnarpo Electric
- p. Pier 16 Fish and Chicken
- q. Javig Holdings LLC

Additionally, 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 move to reopen, dismiss, or otherwise take action in the following two cases:

- (i) *Centerstate Bank, N.A. v. Lake Avenue South East Real Estate, LLC, et al.*, Case No. 18-000897-CI-8 (18th Jud. Cir., Pinellas County, Florida); and
- (ii) *Grand Hope Investments, Inc. v. Lake Avenue South East Real Estate, LLC, et al.*, Case No. 18-000954-CI (18th Jud. Cir., Pinellas County, Florida).

DONE AND ORDERED in Fort Lauderdale, Florida, this 11th day of August, 2022.

A handwritten signature in black ink, appearing to read 'Rodolfo A. Ruiz II', written over a horizontal line.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record