

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 20-CIV-81205-RAR

Securities and Exchange Commission
Plaintiff,

vs.

Complete Business Solutions Group Inc dba
Par Funding Full Spectrum Processing Inc
ABetterFinancialPlan.com LLC dba A Better
Financial Plan ABFP Management Company
LLC fka Pillar Life Settlement Management
Company LLC ABFP Income Fund LLC
ABFP Income Fund Relief
Defendants

ANSWER TO ORDER

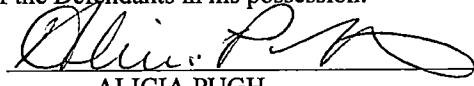
FILED BY MC D.C.
OCT 02 2023
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

NOW COMES TRUIST BANK (the "bank"), third party in the above- referenced action dated September 21, 2023 and answers the Notice of Lien as follows:

X At the time the Order/Garnishment was served upon the Bank, or at any time since then until the date of this Answer, the bank was and is indebted to the Defendants in the amounts listed below:
\$417,850.26, BELONGING TO RETIREMENT EVOLUTION GROUP LLC.
\$4,507.92, BELONGING TO RETIREMENT EVOLUTION GROUP LLC

_____ The Bank has no knowledge, information or belief that any other person is indebted to the Defendants or has any property of the Defendants in his possession.

This the 21TH DAY OF September, 2023.

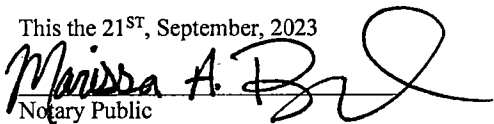

ALICIA PUGH
(910) 272-4247

ALICIA PUGH, being first duly sworn, deposes and says:

That he/she is a Deposit & Payment Operations Specialist of Truist Bank ("Truist") and he/she has read the foregoing Answer and that the same is true and correct based upon his/her review of Truist records, except as to those matters therein alleged on information and belief and as to those he/she believes them to be true.

SWORN TO AND SUBSCRIBED BEFORE ME

This the 21ST, September, 2023


Notary Public

MARISSA A BUNGERT
Notary Public
Bladen Co., North Carolina
My Commission Expires Nov. 28, 2026

My Commission Expires:

Seal-Stamp:



38TH FLOOR ONE OXFORD CENTRE PITTSBURGH, PA 15219
412.263.2000 FAX: 412.263.2001
WWW.PIETRAGALLO.COM
DIRECT DIAL NO.: 412.263.1836
DIRECT FAX DIAL NO.: 412.263.4242
FILE NO.: SFSLAW-114215
E-MAIL: EGS@Pietragallo.com

September 6, 2023

TRUIST
Garnishment & Levy
PO Box 1489
Lumberton, NC 28359

RE: *Complete Business Solutions Group, Inc. v. Ten Eleven Grill LLC* (Docket No. 191000823)

To whom it may concern:

This office represents the Court Appointed Receiver of the assets of Complete Business Solutions Group, Inc (CBSG), a party to the above referenced matter. Please be advised that there is a court imposed stay against any litigation being pursued by or against CBSG or the assets being administered by the Receivership estate that this office represents.

Attached, you will find the Amended Order appointing Ryan Stumphauzer as Receiver for CBSG issued by the United States District Court of the Southern District of Florida which includes provisions in Section VII (Injunction Against Interference with Receiver) enjoining any party from taking action against receivership property. Moreover, Section VIII of the Order (Stay of Litigation) includes the provisions that stay that all litigation involving the Receivership entities (including CBSG):

All civil legal proceedings of any nature, including, but not limited to, bankruptcy proceedings, arbitration proceedings, foreclosure actions, default proceedings, or other actions of any nature involving: (a) the Receiver, in his capacity as Receiver; (b) any Receivership Property, wherever located; (c) any of the Receivership Entities, including subsidiaries and partnerships; or, (d) any of the Receivership Entities' past or present officers, directors, managers, agents, or general or limited partners sued for, or in connection with, any action taken by them while acting in such capacity of any nature, whether as plaintiff, defendant, third-party plaintiff, third-party defendant, or otherwise (such proceedings are hereinafter referred to as "Ancillary Proceedings").

FLORIDA

OHIO

PENNSYLVANIA

WEST VIRGINIA

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September 6, 2023
Page 2

[...]

All Ancillary Proceedings are stayed in their entirety, and all Courts having any jurisdiction thereof are enjoined from taking or permitting any action until further Order of this Court. Further, as to a cause of action accrued or accruing in favor of one or more of the Receivership Entities against a third person or party, any applicable statute of limitation is tolled during the period in which this injunction against commencement of legal proceedings is in effect as to that cause of action.

Also attached is the September 2020 Administrative Order from the Court of Common Pleas of Philadelphia County placing all cases in which CBSG is a party shall be placed in deferred status.

As of the date of this letter, the Litigation Stay and Administrative Order remain in full force and effect. Thank you.

Very truly yours,



Eric G. Soller

Cc: Gaetan Alfano, Esq.

Enclosures



Garnishment - Levy
PO Box 1489
Lumberton, NC 28359

CERTIFIED MAIL®

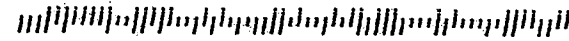


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\$7.18
US POSTAGE
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United States Courthouse
400 N. Miami Avenue
400 N Miami Ave
Miami FL 33128-1801

33128-180199



CERTIFIED MAIL

**USMS
INSPECTED**

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OCT 02 2023
1:28 PM

TO THE HONORABLE CLERK OF COURT
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
266 BAY STREET
MIAMI, FL 33133