

**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 PROCEEDINGS PENDING IN  
THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA AND THE COURT OF COMMON PLEAS OF PHILADELPHIA  
COUNTY, AND BEFORE THE AMERICAN ARBITRATION ASSOCIATION**

**THIS CAUSE** comes before the Court upon the Receiver’s Motion to Lift Litigation Injunction as to Certain Proceedings Pending in the United States District Court for the Eastern District of Pennsylvania and the Court of Common Pleas of Philadelphia County, and before the American Arbitration Association (“Motion”), [ECF No. 1747], filed on November 14, 2023.

The Receiver seeks to modify the Court’s Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], so as to lift the stay of litigation provided for in that Order for certain matters currently pending in the United States District Court for the Eastern District of Pennsylvania and the Court of Common Pleas of Philadelphia County, and before the American Arbitration Association. The Receiver seeks to modify the Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], for the sole purpose of dismissing, transferring, or otherwise terminating the proceedings before those tribunals.

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** with respect to the relief requested. Specifically, the stay of litigation 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 United States District Court for the Eastern District of Pennsylvania and the Court of Common Pleas for Philadelphia County, and before the American Arbitration Association:


- a. *Fleetwood Services LLC., Robert Fleetwood and Pamela Fleetwood v. Complete Business Solutions Group Inc. d/b/a Par Funding, Prime Time Funding LLC., and John and Jane Doe Investors*, Civil Action No. 18-cv-00268-JS.
- b. *HMC Incorporated and Kara DiPietro v. Complete Business Solutions Group Inc. d/b/a Par Funding, and Fast Advance Funding, LLC*, Civil Action No. 19-cv-3285-JS.
- c. *Jack Terzi, Individually, and as Nominee of Entity of their heirs, successors or assigns, and Jack Terzi FBO Jewish Communal Fund and as Nominee of Entity of their heirs, successors or assigns v. Complete Business Solutions Group, Inc.*, Civil Action No. 20-cv-02413-WB.
- d. *Complete Business Solutions Group, Inc. v. Lindsay Blake Inc. and Robert D. Frei*, Civil Action No. 2:19-cv-04236-HB.
- e. *Complete Business Solutions Group, Inc. v. Radiant Images, Inc. d/b/a HD Camera Rentals and Gianna Wolfe*, Civil Action No. 2:18-cv-04013-KSM.
- f. *Complete Business Solutions Group, Inc. v. Sean Whalen and Yingyin Iris Chen*, Civil Action No. 19-cv-06181-JS.
- g. *Complete Business Solutions Group, Inc. v. HMC Incorporated*, Civil Action No. 19-cv-04747-JS.
- h. *Petropangea, Inc.; Johnny Harrison; Volunteer Pharmacy, Inc., and Toby C. Frost; Individually and on Behalf of all those similarly situated v. Complete Business Solutions Group, LLC; Fast Advance Funding, LLC; MCA Capital Fund I, LLC; MCA National Fund, LLC; Recruiting and Marketing Resources, Inc.; Full Spectrum Processing, Inc.*, Case No. Case ID: 200702013.
- i. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Petropangea and Johnny Harrison*, Case No. 190606067.

- j. *Complete Business Solutions Group, Inc. v. MH Marketing Solutions Group, Inc. and Michael Heller*, Case No. 190606813.
- k. *Complete Business Solutions Group, Inc. v. Sunrooms America, Inc. and Michael Foti*, Case No. 200101883.
- l. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Tourmappers North America LLC, d/b/a Tourmappers North America and Julie Paula Katz*, Case No. 200401028.
- m. *Tourmappers North America LLC, d/b/a Tourmappers North America LLC and Julie Katz v. Complete Business Solutions Group Inc. d/b/a Par Funding*, American Arbitration Association No. 01-20-005-3591 (May 21, 2020).

No party is permitted to litigate claims or liability in each of the aforementioned matters.

The Court lifts the stay of litigation for the sole purpose of allowing the Receiver to take steps necessary to dismiss, terminate, or transfer the proceedings to this Court. Any claims of liability asserted against a Receivership Entity shall be administered based upon proof of claim filed in accordance with the Order (1) Approving Proof of Claim Form; (2) Establishing Claims Bar Date and Notice Procedures; and (3) Approving Procedure to Administer and Determine Claims dated December 22, 2022, [ECF No. 1471].

**DONE AND ORDERED** in Miami, Florida, this 14th day of November, 2023.



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