

**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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**RECEIVER AND CAPITAL SOURCE 2000 INC.'S STATUS REPORT  
PURSUANT TO ECF NO. 1779 REGARDING OBJECTION DEADLINE**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,<sup>1</sup> and Capital Source 2000, Inc. (“CS2000”), by and through respective undersigned counsel, and pursuant to the Court’s Paperless Order dated December 19, 2023 [ECF No. 1779],

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<sup>1</sup> The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a 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; 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 property located at 107 Quayside Dr., Jupiter FL.

hereby submit this status report regarding the results of their meet and confer regarding the timing for any objection CS2000 may wish to submit in response to the Receiver's Notices of Determination regarding CS2000's Proof of Claim in this case.

On December 19 and 20, 2023, counsel for the Receiver and counsel for CS2000 exchanged emails and had a telephone call regarding these issues and have agreed as follows:

The Notice of Determination ("NOD") the Receiver issued for CS2000 indicates that CS2000's Proof of Claim is still "pending review." In the NOD, a claim that is "pending review" is described as follows:

**CLAIMS PENDING REVIEW BY RECEIVER** – Claims identified in Exhibit D are pending review by the Receiver and *may be subject to future determination or objection*. The Receiver reserves all rights to object to any Proof of Claim on any basis.

(Emphasis added). The NOD further explains that a claimant may submit an objection to the Receiver's NOD if the claimant "want[s] to contest the Receiver's determination(s) of your Proof(s) of Claim." Because the Receiver has not yet made a substantive determination with respect to CS2000's claim, the Receiver has acknowledged that there is no need for CS2000 to file an objection at this time.

Once the Receiver finalizes his review of CS2000's claim, the Receiver will issue a supplemental or revised NOD to CS2000. There will be a separate objection period for any supplemental or revised NOD the Receiver issues, with the objection deadline calculated from the date of the supplemental/revised NOD. As a result, the Receiver and CS2000 agree that the Court's intervention is not necessary with respect to CS2000's request for an extension of its deadline to object to the Receiver's initial NOD, which indicated a status of "pending review."

Dated: December 20, 2023

Respectfully Submitted,

<p><b>Law Offices of Andre G. Raikhelson, LLC</b>  7000 W Palmetto Park Road  Suite 240  Boca Raton, FL 33433  Telephone: (954) 895-5566  Primary Email: arlaw@raikhelsonlaw.com</p> <p><u>/s/ Andre G. Raikhelson</u>  Andre G. Raikhelson, Esq.  Bar Number: 123657</p> <p><i>Counsel for Defendant, Joseph Cole Barleta</i></p>	<p><b>STUMPHAUZER KOLAYA  NADLER &amp; SLOMAN, PLLC</b>  Two South Biscayne Blvd., Suite 1600  Miami, FL 33131  Telephone: (305) 614-1400</p> <p>By: <u>/s/ Timothy A. Kolaya</u>  TIMOTHY A. KOLAYA  Florida Bar No. 056140  tkolaya@sknlaw.com</p> <p><b>PIETRAGALLO GORDON ALFANO  BOSICK &amp; RASPANTI, LLP</b>  1818 Market Street, Suite 3402  Philadelphia, PA 19103  Telephone: (215) 320-6200</p> <p>By: <u>/s/ Gaetan J. Alfano</u>  GAETAN J. ALFANO  Pennsylvania Bar No. 32971  <i>(Admitted Pro Hac Vice)</i>  GJA@Pietragallo.com  DOUGLAS K. ROSENBLUM  Pennsylvania Bar No. 90989  <i>(Admitted Pro Hac Vice)</i>  DKR@Pietragallo.com</p> <p><i>Co-Counsel for Receiver</i></p>
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 20, 2023, 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