

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, LLC,
et al.,

Defendants.

**PLAINTIFF SECURITY AND EXCHANGE COMMISSION'S NOTICE
REGARDING RECEIVER, RYAN K. STUMPHAUZER'S THIRTIETH MOTION TO LIFT
LITIGATION INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS**

On February 1, 2024, the Receiver filed a Thirtieth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings [ECF No. 1795]. As noted in the Certificate of Conferral, the Receiver did not confer with the Securities and Exchange Commission prior to filing the Motion.

In the Motion, the Receiver seeks “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 direction, to dissolve current writs of garnishment, to mark judgments satisfied, and/or **to reopen confessed judgments.**” (emphasis added).

Litigation concluded in this case in November 2022 against all parties litigating the Commission's claims against them. The Receiver will be consenting to the Final Judgment on behalf of the receivership entities, and claims were submitted by investors last year. Thus, the receivership should be winding down so that distributions can be made. The Receiver's Motion seeks leave to reopen confessed judgments, which indicates potential additional litigation or collections efforts by the Receiver. The Commission would like to confer with the Receiver about what, if any, litigation would occur if the Motion is granted, the expenditure of additional funds for legal and other fees and the amount the Receiver anticipates collecting (a cost-benefit analysis on the use of investor funds in the

Receivership), and the extent to which such matters could prolong the receivership and the distribution to investors.

The Commission learned about the relief sought in the Motion upon reading it after it was filed. Accordingly, the Commission intends to confer with the Receiver's counsel and will then file either a notice that we have no objection to the relief sought or a response to the Motion.

For all future Motions filed by the Receiver, the Receiver's counsel should confer with undersigned counsel for the Commission prior to filing.

February 2, 2024

Respectfully submitted,

s/Amie Riggle Berlin
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