

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.

**RECEIVER'S NOTICE OF FILING UNDER SEAL CLAIMS
DOCUMENTATION FOR CLAIMS THAT ARE THE SUBJECT OF PENDING
RESPONSES TO THE RECEIVER'S MOTION (1) TO APPROVE PROPOSED
TREATMENT OF CLAIMS AND (2) FOR DETERMINATION OF PONZI SCHEME**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver ("Receiver") of the Receivership Entities,¹ pursuant to the Court's Omnibus Order on Claims Determination Process [ECF No. 1944],

¹ The "Receivership Entities" are Complete Business Solutions Group, Inc. d/b/a Par Funding ("CBSG"); 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; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment 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 Consultants, 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; Liberty Eighth Avenue LLC; The LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management LLC; and

hereby files under seal the Proofs of Claim, the Receiver's Notices of Determination, and any objections thereto (collectively, "Claims Documentation") for claims that are the subject of any pending responses to the Receiver's Motion (1) to Approve Proposed Treatment of Claims and (2) for Determination of Ponzi Scheme [ECF No. 1843] ("Claims Motion"). Specifically, the Receiver is filing under seal the Claims Documentation for the following responses to the Claims Motion:

1. ECF No. 1858 - Naresh Shah
2. ECF No. 1859 - Millen Livis
3. ECF No. 1860 - MHL Union
4. ECF No. 1862 - John Dilulo
5. ECF No. 1864 - Merchant Services Income Fund
6. ECF No. 1865 - Nark Nye and Shelli Nye
7. ECF No. 1866 - Melody D. West
8. ECF No. 1867 - Jean P. Rospondek and Stanley J. Rospondek
9. ECF No. 1868 - Scott Bailey
10. ECF No. 1869 - Michael Tierney
11. ECF No. 1870 - Renee Romagnole
12. ECF No. 1871 - Scott Ryan and Index Arbitrage Partners
13. ECF No. 1872 - Philip H. Mowry
14. ECF No. 1873 - James Riddle
15. ECF No. 1880 - RGB Properties Inc
16. ECF No. 1881 - Gary and Mary Fleming
17. ECF No. 1882 - Elizabeth Ratcliff

ALB Management, Inc., and the Receivership also includes the property located at 107 Quayside Drive, Jupiter, Florida 33477.

18. ECF No. 1883 - Tributary Income LLC
19. ECF No. 1884 - Rob Gile
20. ECF No. 1885 - Rob Gile CPA LLC
21. ECF No. 1886 - DiPietro (Part 1)
22. ECF No. 1886 - DiPietro (Part 2)
23. ECF No. 1886 - JKG Holdings
24. ECF No. 1887 – Fleetwood
25. ECF No. 1887 - Gex Management
26. ECF No. 1887 - MH Marketing
27. ECF No. 1887 – Petropangea
28. ECF No. 1887 – Radiant
29. ECF No. 1887 – Sunrooms
30. ECF No. 1887 – Tourmappers
31. ECF No. 1887 - Volunteer Pharmacy
32. ECF No. 1887 - Walen and Chen
33. ECF No. 1889 - Chehebar Investors
34. ECF No. 1890 - Joseph LaForte and Lisa McElhone
35. ECF No. 1892 - Mark Mehok
36. ECF No. 1893 - Joseph Gassman
37. ECF No. 1894 - John Corej
38. ECF No. 1895 - Karen Eissler
39. ECF No. 1896 - Michael Wheatley, as Trustee for Estate of James Brad Law
40. ECF No. 1898 - John Colligan
41. ECF No. 1900 - Debbie Hefty

42. ECF No. 1901 - Daniel Cistone
43. ECF No. 1902 - Jade Fund
44. ECF No. 1903 - Gile Family LLC
45. ECF No. 1904 - Jeffrey Traver
46. ECF No. 1905 - Cathy Palmer
47. ECF No. 1907 - Michael Stierstorfer, MD
48. ECF No. 1908 - Stephan Gammarino and Carole Gammarino
49. ECF Nos. 1909 and 1910 - Charles G. Avetian
50. ECF No. 1920 - Jack Terzi
51. ECF No. 1938 - Joseph Bowen

Dated: June 7, 2024

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 7, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document (without the attachments) is being served this day on all counsel of record via email.

/s/ Timothy A. Kolaya
TIMOTHY A. KOLAYA