

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 COMPLIANCE WITH ORDER REQUIRING SERVICE
ON PACIFIC LIFE INSURANCE COMPANY OF ORDER TO SHOW CAUSE WHY
PACIFIC LIFE INSURANCE COMPANY SHOULD NOT BE HELD IN CONTEMPT**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through his undersigned counsel, pursuant to the Court’s Order to Show Cause Why Pacific Life Insurance Company Should Not Be Held in Contempt (“Order to Show Cause”),

¹ The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding (“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.; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 803 S. 4th St. LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 1223 N. 25th St. LLC; 500 Fairmount Avenue, LLC; Liberty Eighth Avenue LLC; Blue Valley Holdings, 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 33477.

[ECF No. 2130], provides notice of his compliance with the Court's order requiring him to serve the Order to Show Cause on Pacific Life Insurance Company, and states:

1. In the Order to Show Cause, the Court ordered the Receiver to serve a copy of the Order to Show Cause on Pacific Life Insurance Company by April 1, 2025, and to file notice of service on the public docket no later than three (3) days after accomplishing service. *See* Order to Show Cause at 4.

2. Counsel for Pacific Life Insurance Company, Todd M. Fuller, has made an appearance in this case and, therefore, received service of the Order to Show Cause via CM/ECF electronic notification when the Court entered it on the public docket on March 28, 2025.

3. In addition, on March 28, 2025, undersigned counsel for the Receiver sent an email to Mr. Fuller and asked him to confirm that he would accept service of the Order to Show Cause on behalf of his client, Pacific Life Insurance Company. On March 30, 2025, Mr. Fuller responded and confirmed that he would accept service on behalf of Pacific Life Insurance Company. A copy of this email correspondence is attached as Exhibit 1.

4. Accordingly, service has been effected on Pacific Life Insurance Company as required under the Order to Show Cause.

Dated: March 30, 2025

Respectfully Submitted,

**STUMPHAUZER KOLAYA
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Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 30, 2025, 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

Exhibit “1”



Re: Activity in Case 9:20-cv-81205-RAR Securities & Exchange Commission v. Complete Business Solutions Group, Inc. et al Order to Show Cause

From Fuller, Todd M. <TFuller@carltonfields.com>
Date Sun 3/30/2025 11:18 AM
To Timothy Kolaya <tkolaya@sknlaw.com>
Cc Douglas K. Rosenblum <dkr@pietragallo.com>

 1 attachment (21 KB)
stumphauserkolayanadlersloman_95fbe10e-83bc-4917-bb96-d9e1b2032972.png;

Hi Tim,
Yes, I will accept service on behalf of Pacific Life.

Thanks,
Todd

On Mar 28, 2025, at 11:33 AM, Timothy Kolaya <tkolaya@sknlaw.com> wrote:

EXTERNAL SENDER: This Message is from outside the organization.

Todd:

Pursuant to the Court's Order, which is attached, will you please confirm whether you accept service of the Order on behalf of your client, Pacific Life Insurance Company?

Regards,

Tim Kolaya

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<stumphauserkolayanadlersloman_95fbe10e-83bc-4917-bb96-d9e1b2032972.png>

From: cmecfautosender@flsd.uscourts.gov
Sent: Friday, March 28, 2025 11:09 AM
To: flsd_cmecf_notice@flsd.uscourts.gov
Subject: Activity in Case 9:20-cv-81205-RAR Securities & Exchange Commission v. Complete Business Solutions Group, Inc. et al Order to Show Cause

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U.S. District Court

Southern District of Florida

Notice of Electronic Filing

The following transaction was entered on 3/28/2025 at 11:09 AM EDT and filed on 3/28/2025
Case Name:

Securities & Exchange Commission v. Complete Business Solutions Group, Inc. et al

Case Number:

9:20-cv-81205-RAR<<https://ecf.flsd.uscourts.gov/cgi-bin/DktRpt.pl?574947>>

Filer:

WARNING: CASE CLOSED on 11/23/2022

Document Number:

2130<https://ecf.flsd.uscourts.gov/doc1/051128278689?caseid=574947&de_seq_num=6108&magic_num=20266274>

Docket Text:

ORDER TO SHOW CAUSE WHY PACIFIC LIFE INSURANCE COMPANY SHOULD NOT BE HELD IN CONTEMPT. Signed by Judge Rodolfo A. Ruiz, II on 3/28/2025. See attached document for full details. (jgz)

9:20-cv-81205-RAR Notice has been electronically mailed to:

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<DE 2130 - Order to Show Cause as to Pacific Life Insurance Company.pdf>

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