

**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, RYAN K. STUMPHAUZER’S
THIRTY-FIFTH MOTION TO LIFT LITIGATION
INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through undersigned counsel, hereby files this Thirty-Fifth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings, and states as follows:

1. The Receiver hereby moves this Court to lift the Litigation Injunction for the limited purpose of allowing the Receiver, in his discretion, to dissolve current writs of

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.; 205 B Arch St Management LLC; Liberty Eighth Avenue LLC; Blue Valley Holdings, LLC; The LME 2017 Family Trust; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; LM Property Management LLC; and ALB Management, LLC.

garnishment, to mark judgments satisfied, and/or to open confessed judgments, where the counterparty merchant either has resolved, or has agreed to resolve, prior defaults, or otherwise filed for bankruptcy protection, in the following cases in the Court of Common Pleas of Philadelphia County, Pennsylvania.²

2. Each of the 74 cases below involves a writ issued to TD Bank. TD Bank has answered each writ, stating that the defendants do not have an account at TD Bank or that funds in each account are below the statutory minimum necessary for garnishment. Thus, the Receiver seeks to terminate writs against TD Bank in these 74 cases.

3. The cases are:

- a. *Contract Financing Solutions, Inc. v. R.R. Home Special Cleaning LLC d/b/a R.R. Home Special Cleaning and Reyna Elizabeth Guzman*, Philadelphia Court of Common Pleas, Docket No. 191202018.
- b. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Bowes In Home Care Inc. d/b/a Bowes In Home Care d/b/a Bowes In-Home Care and Michael A. Collura*, Philadelphia Court of Common Pleas, Docket No. 200201632.
- c. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. C K Professional Services LLC d/b/a C K Professional Services d/b/a C.K. Professional Services d/b/a Patriot Flags and Christopher Galford*, Philadelphia Court of Common Pleas, Docket No. 200200731.
- d. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Vista Grain LLC d/b/a Vista Grain and Karl Calendine*, Philadelphia Court of Common Pleas, Docket No. 200202850.
- e. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. American Built Homes LLC and Maverick Pate*, Philadelphia Court of Common Pleas, Docket No. 200202086.

² See the Court's Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], ("Operative Receivership Order"). The Receiver generally incorporates the background section of his prior Motions to Lift Litigation Injunction as to Certain Garnishment Proceedings. [See, e.g., ECF No. 111.]. To conserve resources and promote efficiency, the Receiver is providing only a summary narrative, as approved by the Court at the October 7, 2020 status conference.

- f. *Contract Financing Solutions, Inc. d/b/a Par Funding v. TMB Enterprises LLC d/b/a TMB Enterprises d/b/a Haas-Jordan d/b/a Jordan Umbrellas d/b/a Hass-Jordan Umbrellas and Todd Blackmar*, Philadelphia Court of Common Pleas, Docket No. 200103171.
- g. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Saint Johns Properties LLC d/b/a Saint Johns Properties and Steven Hendrickson and Keith Lenger*, Philadelphia Court of Common Pleas, Docket No. 200202910.
- h. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. 240 W. 9 Mile Road LLC d/b/a 118 Sycamore Street d/b/a Bobcat Bonnie's d/b/a Bobcat Bonnie's Enterprises and Matthew Buskard*, Philadelphia Court of Common Pleas, Docket No. 200202919.
- i. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Above and Beyond Management LLC d/b/a Above and Beyond Management and Gregory Cole*, Philadelphia Court of Common Pleas, Docket No. 200200026.
- j. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Classic Landscaping LLC d/b/a Classic Landscaping and Jason Helms*, Philadelphia Court of Common Pleas, Docket No. 200100049.
- k. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Five Stars Specialties Inc. d/b/a Five Start Transport Specialties and Esad Hadzibulic*, Philadelphia Court of Common Pleas, Docket No. 200203225.
- l. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. FTSVR LLC d/b/a Follow the Sun Vacation Rentals and Matthew Dean Birkey*, Philadelphia Court of Common Pleas, Docket No. 200302481.
- m. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Pinnacle Enterprises I LLC d/b/a Pinnacle Enterprises I d/b/a Pinnacle Gutters and Benjamin Nix*, Philadelphia Court of Common Pleas, Docket No. 200301964.
- n. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Big Ben Trucking LLC d/b/a Big Ben Trucking and Idrees Alawad*, Philadelphia Court of Common Pleas, Docket No. 200202249.
- o. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Limpitex Service LLC d/b/a Limpitex Service and Ignacio Martinez Roca*, Philadelphia Court of Common Pleas, Docket No. 200200927.

- p. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Dash Windows of Li Inc. d/b/a Dash Windows of Li and Daniel W. Vasquez*, Philadelphia Court of Common Pleas, Docket No. 190900504.
- q. *Contract Financing Solutions, Inc v. Roman James Design Build Inc. d/b/a Roman James Design Build and James Roman*, Philadelphia Court of Common Pleas, Docket No. 191201490.
- r. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. The Caduceus Group, LLC d/b/a The Caduceus Group and Thomas Vincent Moore Jr.*, Philadelphia Court of Common Pleas, Docket No. 200200456.
- s. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Elite Heating and Cooling LLC d/b/a Elite Heating and Cooling and Michael Willis*, Philadelphia Court of Common Pleas, Docket No. 200202521.
- t. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Dolce Nails and Spa Inc. d/b/a Dolce Nails and Spa d/b/a Dolce Nails & Spa and Sangsub Kim*, Philadelphia Court of Common Pleas, Docket No. 200202629.
- u. *Contract Financing Solutions, Inc v. Integrity HVAC/Mechanical LLC d/b/a Integrity HVAC Mechanical LLC d/b/a Integrity HVAC Mechanical and Wendell Motes*, Philadelphia Court of Common Pleas, Docket No. 191101719.
- v. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ad Lucem LLC d/b/a Ad Lucem d/b/a Ad Lucem LLC and Christopher Carey Jr. and Alejandro Amancio Gill*, Philadelphia Court of Common Pleas, Docket No. 200301218.
- w. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hitz Restaurant Group LLC d/b/a Hitz Restaurant Group and Robert Hitz*, Philadelphia Court of Common Pleas, Docket No. 200300964.
- x. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. BMA Rental LLC d/b/a BMA Rental and Eugenio Sanchez and Broderick Sanchez*, Philadelphia Court of Common Pleas, Docket No. 200300654.
- y. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Great Lakes Rec LLC d/b/a Great Lakes Recreational and David Hite*, Philadelphia Court of Common Pleas, Docket No. 190402871.
- z. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Believe Solutions Inc. d/b/a Believe Solutions and Joseph Rogers*, Philadelphia Court of Common Pleas, Docket No. 200200473.

- aa. *Contract Financing Solutions, Inc v. Dundee Auction Services and Sale Barn Inc. d/b/a Dundee Auction Services and Sale Barn and Mark Oberly*, Philadelphia Court of Common Pleas, Docket No. 200301708.
- bb. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hanks Towing Inc. and Dan Eanes*, Philadelphia Court of Common Pleas, Docket No. 200301942.
- cc. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Bonita Dental Care PA d/b/a Marco Dental Care PA d/b/a Marco Island Dental Care and Frederick J. Eck*, Philadelphia Court of Common Pleas, Docket No. 190900746.
- dd. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Jafar LLC d/b/a Lau Nightclub and Fadi Jafar*, Philadelphia Court of Common Pleas, Docket No. 200302368.
- ee. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. BWB Controls Inc. d/b/a BWB Controls d/b/a B.W.B. Controls and Frederick Alexander*, Philadelphia Court of Common Pleas, Docket No. 200301274.
- ff. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Truss Sales and Installation Inc. d/b/a Truss Sales and Installation and Joe Odgers*, Philadelphia Court of Common Pleas, Docket No. 190703082.
- gg. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Rice Hope Liquors LLC d/b/a Rice Hope Liquors and Randy Roesar and Ewa Rosear*, Philadelphia Court of Common Pleas, Docket No. 200300147.
- hh. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Harmony Contracting Inc. d/b/a Harmony Contracting Corporation and Stevan Lazarevich*, Philadelphia Court of Common Pleas, Docket No. 200203507.
- ii. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Golden Grooming Company d/b/a Golden Grooming and Abdul Golden*, Philadelphia Court of Common Pleas, Docket No. 200301710.
- jj. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Seed Burger LLC d/b/a Seed Burger and Dan Zeno*, Philadelphia Court of Common Pleas, Docket No. 200302914.
- kk. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Towle and Sons LLC d/b/a Towle & Sons LLC d/b/a Towle and Sons and Lee H. Towle and Cheri Towle*, Philadelphia Court of Common Pleas, Docket No. 190800445.

- ll. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. T C and B Corporate Wearables Inc. d/b/a T C and B Corporate Wearables and Clark Fessler*, Philadelphia Court of Common Pleas, Docket No. 200302727.
- mm. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Wabtec Holdings Corporation d/b/a Clubtec and Donald Williams*, Philadelphia Court of Common Pleas, Docket No. 200400036.
- nn. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ridgeway Trailer Company Inc. d/b/a Ridgeway Trailer Company d/b/a Ridgeway Trailer Co and Jane L. Berkovitz and Scott E. Berkovitz*, Philadelphia Court of Common Pleas, Docket No. 200302916.
- oo. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Sugarman Auction Corp. d/b/a Sugarman Auction Group d/b/a Sugarman Auction and Scott Grasso*, Philadelphia Court of Common Pleas, Docket No. 200202295.
- pp. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Advantage Trading LLC d/b/a Advantage Trading d/b/a Primex Prime Electronic Execution Inc. and Wilfredo Felix*, Philadelphia Court of Common Pleas, Docket No. 200302917.
- qq. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. RVR Electrical and General Contracting LLC d/b/a RVR Electrical and General Contracting d/b/a RVR Electrical and General Contr. and Robert Bisher*, Philadelphia Court of Common Pleas, Docket No. 200300896.
- rr. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hughes Sole Proprietor, Eric J d/b/a EZY-E's Takeout Delivery and Eric J. Hughes*, Philadelphia Court of Common Pleas, Docket No. 200301460.
- ss. *Contract Financing Solutions, Inc v. Conclusive Solutions Group Corp. d/b/a Conclusive Solutions Group and Jason Bradway*, Philadelphia Court of Common Pleas, Docket No. 200200476.
- tt. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Lady Lake Monitessori LLC d/b/a Lady Lake Monitessori and Emmanuella Rojas*, Philadelphia Court of Common Pleas, Docket No. 200203402.
- uu. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Limited-Watches Inc. d/b/a Limited Watches d/b/a LTD Watches Inc. d/b/a Limited Watches Inc. and Omer Zach*, Philadelphia Court of Common Pleas, Docket No. 191201508.

- vv. *Complete Business Solutions Group, Inc. d/b/a Renee Ann Omatz Sole Proprietor d/b/a Renee's Cards Gifts and Flowers d/b/a Renee's Flowers and Renee A. Omatz*, Philadelphia Court of Common Pleas, Docket No. 200301486.
- ww. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. IWR and Maintenance LLC d/b/a IWR and Maintenance d/b/a Industrial Welding & Repair Maintenance d/b/a Industrial Welding Repair and Matthew Mark Bowmer*, Philadelphia Court of Common Pleas, Docket No. 200202604.
- xx. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Akiladelphia Creative Contracting LLC d/b/a Akiladelphia Creative Contracting and Akil Bowler*, Philadelphia Court of Common Pleas, Docket No. 200400137.
- yy. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. EBCF Enterprises Inc. d/b/a EBCF Enterprises d/b/a Andrews Open Pit and Christos Floros*, Philadelphia Court of Common Pleas, Docket No. 200202546.
- zz. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Thomas Group LLC d/b/a Thomas Group d/b/a Pit Shop and Ronald Thomas*, Philadelphia Court of Common Pleas, Docket No. 200203309.
- aaa. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Eric H. Boling Sole Proprietor d/b/a Beagles Auto Repair and Eric H. Boling*, Philadelphia Court of Common Pleas, Docket No. 200400140.
- bbb. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Yellow Express North America LLC d/b/a Yellow Express North America d/b/a Yellow Express Holdings d/b/a Yellow Express USA Holdings and Christopher Myers*, Philadelphia Court of Common Pleas, Docket No. 200400139.
- ccc. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Brown Ally LLC d/b/a Brown Ally LTD, Liability Co. d/b/a Brown Ally and Janee Williams*, Philadelphia Court of Common Pleas, Docket No. 200103172.
- ddd. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. SRS Platinum Inc. d/b/a SRS Platinum d/b/a 3HProducts and Christopher McCraley*, Philadelphia Court of Common Pleas, Docket No. 200400218.
- eee. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Samuel Richard Dehard Sole Proprietor d/b/a East Main Street Tire d/b/a d/b/a East Main Street Tire and Services LLC and Samuel Richard Dehart*, Philadelphia Court of Common Pleas, Docket No. 200400438.

- fff. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Swift Recycling LLC d/b/a Swift Recycling and Alejandro Hernandez*, Philadelphia Court of Common Pleas, Docket No. 200400266.
- ggg. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ellis Concrete LLC d/b/a Ellis Concrete and Arthur Ellis*, Philadelphia Court of Common Pleas, Docket No. 200400386.
- hhh. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Alegria Remodel and Construction Inc. d/b/a Alegria Remodel and Construction and Walter Barillas*, Philadelphia Court of Common Pleas, Docket No. 200400618.
- iii. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Leslie Layne Inc. d/b/a Plant Peddlers Flowers and Sandra Worley*, Philadelphia Court of Common Pleas, Docket No. 200400392.
- jjj. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Premier Builders General Contractors LLC d/b/a Premier Builders General Contractors and Chris Lennis Adkins*, Philadelphia Court of Common Pleas, Docket No. 200400615.
- kkk. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. The Chonillo Law Group LLC d/b/a The Chonillo Law Group and Greg Chonillo*, Philadelphia Court of Common Pleas, Docket No. 191003897.
- lll. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Aaria Corporation d/b/a Oasis Travel Plaza and Mitulkumar Patel*, Philadelphia Court of Common Pleas, Docket No. 200101363.
- mmm. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. MTS Express and Tatyana Maksim*, Philadelphia Court of Common Pleas, Docket No. 191201489.
- nnn. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. BNJ Trucking LLC d/b/a BNJ Trucking and Gurprit Deol*, Philadelphia Court of Common Pleas, Docket No. 200200857.
- ooo. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ohio Natural Stone Works LLC d/b/a Ohio Natural Stone Works d/b/a Ohio Natural Stone Inc. and Steven Mason*, Philadelphia Court of Common Pleas, Docket No. 200101370.
- ppp. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Primex Prime Electronic Execution Inc. d/b/a Primex Prime Electronic Execution d/b/a Primex and Wilfredo Felix a/k/a Wil Felix*, Philadelphia Court of Common Pleas, Docket No. 200500693.

qqq. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. New Image Construction of New Jersey, Inc. d/b/a New Image Construction of New Jersey and Salam Shaida and Michael Ghaida*, Philadelphia Court of Common Pleas, Docket No. 200102511.

rrr. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Rowe Enterprizes Company d/b/a Rowe Enterprizes and Donald Martin*, Philadelphia Court of Common Pleas, Docket No. 200101751.

sss. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ron Mancini Trucking LLC d/b/a Ron Mancini Trucking and Ron Mancini*, Philadelphia Court of Common Pleas, Docket No. 200101513.

ttt. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Barry Paul Laroque Sole Proprietor d/b/ Upscale Consignment and Hardware and Barry P. Laroque*, Philadelphia Court of Common Pleas, Docket No. 200201643.

uuu. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Unique Trans Corporation d/b/a Unique Trans and Nabiah Koubaissy*, Philadelphia Court of Common Pleas, Docket No. 200200469.

vvv. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Colorado Homes LLC d/b/a CO Homes LLC d/b/a Alda Design d/b/a Colorado Homes LLC United by Ech LLC and Ranko Mocevic and Stefan Mocevic*, Philadelphia Court of Common Pleas, Docket No. 200302052.

The Receiver has determined, in his professional judgment, that it is in the best interests of the Receivership Estate to dissolve current writs of garnishment, to mark judgments satisfied, and/or to open confessed judgments with respect to these cases.

WHEREFORE, Ryan K. Stumphauzer, as Court-Appointed Receiver, by and through his undersigned counsel, respectfully requests this Honorable Court to grant the motion and lift the Litigation Injunction on a limited basis as set forth above. A proposed order for the Court's consideration is attached as Exhibit 1.

CERTIFICATION REGARDING PRE-FILING CONFERENCE

The undersigned counsel has conferred with all counsel of record and unrepresented parties in this matter regarding the relief sought through this motion and certifies that all counsel of record and unrepresented parties have either: (1) not responded to the Receiver's meet and confer requests; or (2) confirmed that their clients either do not oppose or take no position with respect to the relief sought. The SEC does not oppose the motion to lift the litigation injunction.

Dated: July 7, 2025

Respectfully Submitted,

**STUMPHAUZER KOLAYA
NADLER & SLOMAN, PLLC**
Two South Biscayne Blvd., Suite 1600
Miami, FL 33131
Telephone: (305) 614-1400
Facsimile: (305) 614-1425

By: /s/ Timothy A. Kolaya
TIMOTHY A. KOLAYA
Florida Bar No. 056140
tkolaya@sfslaw.com

Co-Counsel for Receiver

**PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP**
1818 Market Street, Suite 3402
Philadelphia, PA 19103
Telephone: (215) 320-6200
Facsimile: (215) 981-0082

By: /s/ Gaetan J. Alfano
GAETAN J. ALFANO
Pennsylvania Bar No. 32971
(Admitted Pro Hac Vice)
GJA@Pietragallo.com
DOUGLAS K. ROSENBLUM
Pennsylvania Bar No. 90989
(Admitted Pro Hac Vice)
DKR@Pietragallo.com

Co-Counsel for Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 7, 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

**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.

**[PROPOSED] ORDER GRANTING RECEIVER, RYAN K. STUMPHAUZER’S
THIRTY-FIFTH MOTION TO LIFT LITIGATION
INJUNCTION AS TO CERTAIN GARNISHMENT PROCEEDINGS**

THIS CAUSE comes before the Court upon the Receiver’s Thirty-Fifth Motion to Lift Litigation Injunction as to Certain Garnishment Proceedings, [ECF No. ____] (“Motion”), filed on July 7, 2025.

In the Motion, the Receiver seeks to modify the Court’s Amended Order Appointing Receiver dated August 13, 2020, [ECF No. 141], so as 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, where the counterparty merchant either has resolved, has agreed to resolve, prior defaults, or otherwise filed for bankruptcy protection.

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 litigation injunction 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 Court of Common Pleas of Philadelphia County, Pennsylvania, and solely for the purpose as described in the Motion:

- a. *Contract Financing Solutions, Inc. v. R.R. Home Special Cleaning LLC d/b/a R.R. Home Special Cleaning and Reyna Elizabeth Guzman*, Philadelphia Court of Common Pleas, Docket No. 191202018.
- b. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Bowes In Home Care Inc. d/b/a Bowes In Home Care d/b/a Bowes In-Home Care and Michael A. Collura*, Philadelphia Court of Common Pleas, Docket No. 200201632.
- c. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. C K Professional Services LLC d/b/a C K Professional Services d/b/a C.K. Professional Services d/b/a Patriot Flags and Christopher Galford*, Philadelphia Court of Common Pleas, Docket No. 200200731.
- d. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Vista Grain LLC d/b/a Vista Grain and Karl Calendine*, Philadelphia Court of Common Pleas, Docket No. 200202850.
- e. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. American Built Homes LLC and Maverick Pate*, Philadelphia Court of Common Pleas, Docket No. 200202086.
- f. *Contract Financing Solutions, Inc. d/b/a Par Funding v. TMB Enterprises LLC d/b/a TMB Enterprises d/b/a Haas-Jordan d/b/a Jordan Umbrellas d/b/a Hass-Jordan Umbrellas and Todd Blackmar*, Philadelphia Court of Common Pleas, Docket No. 200103171.
- g. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Saint Johns Properties LLC d/b/a Saint Johns Properties and Steven Hendrickson and Keith Lenger*, Philadelphia Court of Common Pleas, Docket No. 200202910.
- h. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. 240 W. 9 Mile Road LLC d/b/a 118 Sycamore Street d/b/a Bobcat Bonnie's d/b/a Bobcat Bonnie's Enterprises and Matthew Buskard*, Philadelphia Court of Common Pleas, Docket No. 200202919.

- i. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Above and Beyond Management LLC d/b/a Above and Beyond Management and Gregory Cole*, Philadelphia Court of Common Pleas, Docket No. 200200026.
- j. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Classic Landscaping LLC d/b/a Classic Landscaping and Jason Helms*, Philadelphia Court of Common Pleas, Docket No. 200100049.
- k. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Five Stars Specialties Inc. d/b/a Five Start Transport Specialties and Esad Hadzibulic*, Philadelphia Court of Common Pleas, Docket No. 200203225.
- l. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. FTSVR LLC d/b/a Follow the Sun Vacation Rentals and Matthew Dean Birkey*, Philadelphia Court of Common Pleas, Docket No. 200302481.
- m. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Pinnacle Enterprises 1 LLC d/b/a Pinnacle Enterprises 1 d/b/a Pinnacle Gutters and Benjamin Nix*, Philadelphia Court of Common Pleas, Docket No. 200301964.
- n. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Big Ben Trucking LLC d/b/a Big Ben Trucking and Idrees Alawad*, Philadelphia Court of Common Pleas, Docket No. 200202249.
- o. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Limpitex Service LLC d/b/a Limpitex Service and Ignacio Martinez Roca*, Philadelphia Court of Common Pleas, Docket No. 200200927.
- p. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Dash Windows of Li Inc. d/b/a Dash Windows of Li and Daniel W. Vasquez*, Philadelphia Court of Common Pleas, Docket No. 190900504.
- q. *Contract Financing Solutions, Inc v. Roman James Design Build Inc. d/b/a Roman James Design Build and James Roman*, Philadelphia Court of Common Pleas, Docket No. 191201490.
- r. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. The Caduceus Group, LLC d/b/a The Caduceus Group and Thomas Vincent Moore Jr.*, Philadelphia Court of Common Pleas, Docket No. 200200456.
- s. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Elite Heating and Cooling LLC d/b/a Elite Heating and Cooling and Michael Willis*, Philadelphia Court of Common Pleas, Docket No. 200202521.

- t. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Dolce Nails and Spa Inc. d/b/a Dolce Nails and Spa d/b/a Dolce Nails & Spa and Sangsub Kim*, Philadelphia Court of Common Pleas, Docket No. 200202629.
- u. *Contract Financing Solutions, Inc v. Integrity HVAC/Mechanical LLC d/b/a Integrity HVAC Mechanical LLC d/b/a Integrity HVAC Mechanical and Wendell Motes*, Philadelphia Court of Common Pleas, Docket No. 191101719.
- v. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ad Lucem LLC d/b/a Ad Lucem d/b/a Ad Lucem LLC and Christopher Carey Jr. and Alejandro Amancio Gill*, Philadelphia Court of Common Pleas, Docket No. 200301218.
- w. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hitz Restaurant Group LLC d/b/a Hitz Restaurant Group and Robert Hitz*, Philadelphia Court of Common Pleas, Docket No. 200300964.
- x. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. BMA Rental LLC d/b/a BMA Rental and Eugenio Sanchez and Broderick Sanchez*, Philadelphia Court of Common Pleas, Docket No. 200300654.
- y. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Great Lakes Rec LLC d/b/a Great Lakes Recreational and David Hite*, Philadelphia Court of Common Pleas, Docket No. 190402871.
- z. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Believe Solutions Inc. d/b/a Believe Solutions and Joseph Rogers*, Philadelphia Court of Common Pleas, Docket No. 200200473.
- aa. *Contract Financing Solutions, Inc v. Dundee Auction Services and Sale Barn Inc. d/b/a Dundee Auction Services and Sale Barn and Mark Oberly*, Philadelphia Court of Common Pleas, Docket No. 200301708.
- bb. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hanks Towing Inc. and Dan Eanes*, Philadelphia Court of Common Pleas, Docket No. 200301942.
- cc. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Bonita Dental Care PA d/b/a Marco Dental Care PA d/b/a Marco Island Dental Care and Frederick J. Eck*, Philadelphia Court of Common Pleas, Docket No. 190900746.

- dd. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Jafar LLC d/b/a Lau Nightclub and Fadi Jafar*, Philadelphia Court of Common Pleas, Docket No. 200302368.
- ee. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. BWB Controls Inc. d/b/a BWB Controls d/b/a B.W.B. Controls and Frederick Alexander*, Philadelphia Court of Common Pleas, Docket No. 200301274.
- ff. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Truss Sales and Installation Inc. d/b/a Truss Sales and Installation and Joe Odgers*, Philadelphia Court of Common Pleas, Docket No. 190703082.
- gg. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Rice Hope Liquors LLC d/b/a Rice Hope Liquors and Randy Roesar and Ewa Rosear*, Philadelphia Court of Common Pleas, Docket No. 200300147.
- hh. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Harmony Contracting Inc. d/b/a Harmony Contracting Corporation and Stevan Lazarevich*, Philadelphia Court of Common Pleas, Docket No. 200203507.
- ii. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Golden Grooming Company d/b/a Golden Grooming and Abdul Golden*, Philadelphia Court of Common Pleas, Docket No. 200301710.
- jj. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Seed Burger LLC d/b/a Seed Burger and Dan Zeno*, Philadelphia Court of Common Pleas, Docket No. 200302914.
- kk. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Towle and Sons LLC d/b/a Towle & Sons LLC d/b/a Towle and Sons and Lee H. Towle and Cheri Towle*, Philadelphia Court of Common Pleas, Docket No. 190800445.
- ll. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. T C and B Corporate Wearables Inc. d/b/a T C and B Corporate Wearables and Clark Fessler*, Philadelphia Court of Common Pleas, Docket No. 200302727.
- mm. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Wabtec Holdings Corporation d/b/a Clubtec and Donald Williams*, Philadelphia Court of Common Pleas, Docket No. 200400036.
- nn. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ridgeway Trailer Company Inc. d/b/a Ridgeway Trailer Company d/b/a Ridgeway Trailer Co and Jane L. Berkovitz and Scott E. Berkovitz*, Philadelphia Court of Common Pleas, Docket No. 200302916.

- oo. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Sugarman Auction Corp. d/b/a Sugarman Auction Group d/b/a Sugarman Auction and Scott Grasso*, Philadelphia Court of Common Pleas, Docket No. 200202295.
- pp. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Advantage Trading LLC d/b/a Advantage Trading d/b/a Primex Prime Electronic Execution Inc. and Wilfredo Felix*, Philadelphia Court of Common Pleas, Docket No. 200302917.
- qq. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. RVR Electrical and General Contracting LLC d/b/a RVR Electrical and General Contracting d/b/a RVR Electrical and General Contr. and Robert Bisher*, Philadelphia Court of Common Pleas, Docket No. 200300896.
- rr. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Hughes Sole Proprietor, Eric J d/b/a EZY-E's Takeout Delivery and Eric J. Hughes*, Philadelphia Court of Common Pleas, Docket No. 200301460.
- ss. *Contract Financing Solutions, Inc v. Conclusive Solutions Group Corp. d/b/a Conclusive Solutions Group and Jason Bradway*, Philadelphia Court of Common Pleas, Docket No. 200200476.
- tt. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Lady Lake Monitessori LLC d/b/a Lady Lake Monitessori and Emmanuella Rojas*, Philadelphia Court of Common Pleas, Docket No. 200203402.
- uu. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Limited-Watches Inc. d/b/a Limited Watches d/b/a LTD Watches Inc. d/b/a Limited Watches Inc. and Omer Zach*, Philadelphia Court of Common Pleas, Docket No. 191201508.
- vv. *Complete Business Solutions Group, Inc. d/b/a Renee Ann Omatz Sole Proprietor d/b/a Renee's Cards Gifts and Flowers d/b/a Renee's Flowers and Renee A. Omatz*, Philadelphia Court of Common Pleas, Docket No. 200301486.
- ww. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. IWR and Maintenance LLC d/b/a IWR and Maintenance d/b/a Industrial Welding & Repair Maintenance d/b/a Industrial Welding Repair and Matthew Mark Bowmer*, Philadelphia Court of Common Pleas, Docket No. 200202604.
- xx. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Akiladelphia Creative Contracting LLC d/b/a Akiladelphia Creative Contracting and Akil Bowler*, Philadelphia Court of Common Pleas, Docket No. 200400137.

- yy. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. EBCF Enterprises Inc. d/b/a EBCF Enterprises d/b/a Andrews Open Pit and Christos Floros*, Philadelphia Court of Common Pleas, Docket No. 200202546.
- zz. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Thomas Group LLC d/b/a Thomas Group d/b/a Pit Shop and Ronald Thomas*, Philadelphia Court of Common Pleas, Docket No. 200203309.
- aaa. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Eric H. Boling Sole Proprietor d/b/a Beagles Auto Repair and Eric H. Boling*, Philadelphia Court of Common Pleas, Docket No. 200400140.
- bbb. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Yellow Express North America LLC d/b/a Yellow Express North America d/b/a Yellow Express Holdings d/b/a Yellow Express USA Holdings and Christopher Myers*, Philadelphia Court of Common Pleas, Docket No. 200400139.
- ccc. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Brown Ally LLC d/b/a Brown Ally LTD, Liability Co. d/b/a Brown Ally and Janee Williams*, Philadelphia Court of Common Pleas, Docket No. 200103172.
- ddd. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. SRS Platinum Inc. d/b/a SRS Platinum d/b/a 3HProducts and Christopher McCraley*, Philadelphia Court of Common Pleas, Docket No. 200400218.
- eee. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Samuel Richard Dehard Sole Proprietor d/b/a East Main Street Tire d/b/a d/b/a East Main Street Tire and Services LLC and Samuel Richard Dehart*, Philadelphia Court of Common Pleas, Docket No. 200400438.
- fff. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Swift Recycling LLC d/b/a Swift Recycling and Alejandro Hernandez*, Philadelphia Court of Common Pleas, Docket No. 200400266.
- ggg. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ellis Concrete LLC d/b/a Ellis Concrete and Arthur Ellis*, Philadelphia Court of Common Pleas, Docket No. 200400386.
- hhh. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Alegria Remodel and Construction Inc. d/b/a Alegria Remodel and Construction and Walter Barillas*, Philadelphia Court of Common Pleas, Docket No. 200400618.

- iii. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Leslie Layne Inc. d/b/a Plant Peddlers Flowers and Sandra Worley*, Philadelphia Court of Common Pleas, Docket No. 200400392.
- jjj. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Premier Builders General Contractors LLC d/b/a Premier Builders General Contractors and Chris Lennis Adkins*, Philadelphia Court of Common Pleas, Docket No. 200400615.
- kkk. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. The Chonillo Law Group LLC d/b/a The Chonillo Law Group and Greg Chonillo*, Philadelphia Court of Common Pleas, Docket No. 191003897.
- lll. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Aaria Corporation d/b/a Oasis Travel Plaza and Mitulkumar Patel*, Philadelphia Court of Common Pleas, Docket No. 200101363.
- mmm. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. MTS Express and Tatyana Maksim*, Philadelphia Court of Common Pleas, Docket No. 191201489.
- nnn. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. BNJ Trucking LLC d/b/a BNJ Trucking and Gurprit Deol*, Philadelphia Court of Common Pleas, Docket No. 200200857.
- ooo. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ohio Natural Stone Works LLC d/b/a Ohio Natural Stone Works d/b/a Ohio Natural Stone Inc. and Steven Mason*, Philadelphia Court of Common Pleas, Docket No. 200101370.
- ppp. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Primex Prime Electronic Execution Inc. d/b/a Primex Prime Electronic Execution d/b/a Primex and Wilfredo Felix a/k/a Wil Felix*, Philadelphia Court of Common Pleas, Docket No. 200500693.
- qqq. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. New Image Construction of New Jersey, Inc. d/b/a New Image Construction of New Jersey and Salam Shaida and Michael Ghaida*, Philadelphia Court of Common Pleas, Docket No. 200102511.
- rrr. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Rowe Enterprizes Company d/b/a Rowe Enterprizes and Donald Martin*, Philadelphia Court of Common Pleas, Docket No. 200101751.
- sss. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Ron Mancini Trucking LLC d/b/a Ron Mancini Trucking and Ron Mancini*, Philadelphia Court of Common Pleas, Docket No. 200101513.

ttt. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Barry Paul Laroque Sole Proprietor d/b/ Upscale Consignment and Hardware and Barry P. Laroque*, Philadelphia Court of Common Pleas, Docket No. 200201643.

uuu. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Unique Trans Corporation d/b/a Unique Trans and Nabiah Koubaissy*, Philadelphia Court of Common Pleas, Docket No. 200200469.

vvv. *Complete Business Solutions Group, Inc. d/b/a Par Funding v. Colorado Homes LLC d/b/a CO Homes LLC d/b/a Alda Design d/b/a Colorado Homes LLC United by Ech LLC and Ranko Mocevic and Stefan Mocevic*, Philadelphia Court of Common Pleas, Docket No. 200302052.

DONE AND ORDERED in Miami, Florida, this _____ day of July, 2025.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record