

**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.

_____ /

PLAINTIFF'S NOTICE OF FILING PROPOSED ORDER

Plaintiff Securities and Exchange Commission provides notice of filing the attached proposed Order relating to Plaintiff's Notice of Intent to Forgo Disgorgement and Civil Penalties Against Corporate Defendants and Relief Defendant.

Dated: August 14, 2026

Respectfully submitted:

By: s/ Brian Lechich
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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.

**ORDER ON PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
NOTICE OF INTENT TO FORGO DISGORGEMENT AND CIVIL
PENALTIES AGAINST CORPORATE DEFENDANTS AND RELIEF DEFENDANT**

THIS CAUSE comes before the Court upon the filing by Plaintiff Securities and Exchange Commission ("SEC") of a Notice of Intent to Forgo Disgorgement and Civil Penalties Against Corporate Defendants and Relief Defendant ("Notice"; ECF No. 2234).

In the Notice, the SEC advises the Court that it forgoes its claims for disgorgement and prejudgment interest the following Defendants:

- (i) Complete Business Solutions Group, Inc.;
- (ii) Full Spectrum Processing, Inc.;
- (iii) ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan;
- (iv) ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC;
- (v) ABFP Income Fund, LLC;
- (vi) ABFP Income Fund 2, L.P.;
- (vii) United Fidelis Group Corp.;

- (viii) Fidelis Financial Planning LLC;
- (ix) Retirement Evolution Group, LLC;
- (x) RE Income Fund LLC; and
- (xi) RE Income Fund 2 LLC (collectively, “Corporate Defendants”).

The SEC further advises in the Notice that it forgoes its claims for disgorgement and prejudgment interest against Relief Defendant LME 2017 Family Trust.

In the Notice, the SEC also advises that it forgoes its claims for civil penalties against the following six Corporate Defendants, which are the only Corporate Defendants against which the SEC sought civil penalties.

- (i) Complete Business Solutions Group, Inc.;
- (ii) Full Spectrum Processing, Inc.;
- (iii) ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan;
- (iv) ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC;
- (v) United Fidelis Group Corp.; and
- (vi) Retirement Evolution Group, LLC.

In the Notice, the SEC also “requests that the already-entered Judgment [ECF No. 391] that, among other things, resolved liability and imposed permanent injunctive relief against Corporate Defendants, remain in place and in full force.”

The Court having carefully reviewed the Notice and the record in this matter, and noting that all of the SEC’s causes of action have already been resolved, it is hereby:

ORDERED AND ADJUDGED that the Judgment [ECF No. 391] against the Corporate Defendants shall be deemed a Final Judgment.

DONE AND ORDERED in Miami, Florida, this ____ day of August 2026.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record