

**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.,**

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

Plaintiff Securities and Exchange Commission (“Commission”) provides notice regarding its remaining claims in this case against the Corporate Defendants and the Relief Defendant. It is the Commission’s intention that this notice resolves all outstanding claims the Commission has against the entities identified below, all of which are under the control of the Court-Appointed Receiver, Ryan K. Stumphauzer, Esq. This also resolves the Commission’s case in its entirety.

Pursuant to the Judgment of Permanent Injunction and Other Relief Against the Corporate Defendants [ECF No. 391], the Commission may seek disgorgement, prejudgment interest, and civil penalties against the Corporate Defendants upon filing a motion seeking those remedies. *Id.* at 9-10. The Commission forgoes its claims for disgorgement and prejudgment interest against the Corporate Defendants and the Relief Defendant. Specifically, the Commission forgoes its claims for disgorgement and prejudgment interest against:

- (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 Commission also forgoes its claim for disgorgement against Relief Defendant LME 2017 Family Trust.

Finally, the Commission also forgoes its claims for civil penalties against the following sub-set of the Corporate Defendants, as they are the only Corporate Defendants against which the Commission has 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.

Based on the foregoing, the Commission forgoes its claims for disgorgement and prejudgment interest against the above listed Corporate Defendants and the Relief Defendant, and

forgoes its claims for civil penalties against the six applicable Corporate Defendants identified separately above. This notice is intended to resolve all outstanding claims and matters brought by the Commission against those entities, and thus resolves the Commission's claims against all Corporate and Relief Defendants in their entirety. The Court has already adjudicated Commission's claims against the Individual Defendants.

The Commission requests that the already entered Judgment [ECF No. 391] that, among other things, resolved liability and imposed permanent injunctive relief against the Corporate Defendants, remain in place and in full force.¹

Dated: August 12, 2026

Respectfully submitted:

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¹ Per the Receiver's Quarterly Report, Dated July 31, 2026 [ECF No. 2233], the Receiver's work is ongoing and continues.