

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 20-CIV-81205-RAR**

**SECURITIES AND EXCHANGE  
COMMISSION,**

Plaintiff,

v.

**COMPLETE BUSINESS SOLUTIONS  
GROUP, INC. d/b/a PAR FUNDING, et al.,**

Defendants.

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**ORDER GRANTING RECEIVER’S EMERGENCY MOTION TO ENJOIN ACCESS TO  
COMPLETE BUSINESS SOLUTIONS GROUP, INC. D/B/A PAR FUNDING AND FULL  
SPECTRUM PROCESSING, INC.’S ELECTRONICALLY STORED INFORMATION**

**THIS CAUSE** comes before the Court upon the Receiver’s Emergency Motion to Enjoin Access to Complete Business Solutions Group, Inc. d/b/a Par Funding (“Par Funding”) and Full Spectrum Processing, Inc.’s (“Full Spectrum”) Electronically Stored Information [ECF No. 155] (“Motion”). The Court having reviewed the Motion and being otherwise fully advised, it is

**ORDERED AND ADJUDGED** that the Receiver’s Motion is **GRANTED** as follows:

1. Pursuant to the Order Granting Plaintiff Securities and Exchange Commission’s Motion for Appointment of Receiver [ECF No. 36] and the Amended Order Appointing Receiver [ECF No. 141], the Court granted the Receiver the authority to, among other things: (a) “take immediate possession of all personal property of the Receivership Entities, wherever located, including but not limited to electronically stored information, computers, laptops, hard drives, external storage drives, and any other such memory, media or electronic storage devices” and (b) “secure and safeguard the Receivership Entity’s information technology, data, documents, storage

systems, and documents” (“Authority Over Electronic Data”). *See* ECF No. 141 at 8; ECF No. 36 at 3.

2. The Court also ordered that the “Receivership Entities and all persons receiving notice of this Order shall not hinder or interfere with the Receiver’s efforts to take control or possession of the Receivership Entities’ property interests identified above, or hinder his efforts to preserve them” (“Prohibition Against Interference”). *See* ECF No. 36 at 4.

3. In exercising his Authority Over Electronic Data and to prevent violations of the Prohibition Against Interference, the Receiver is authorized to suspend, temporarily, access to users of the G Suite electronic data platform that CBSG and Full Spectrum utilize, as well “super administrator access” rights for individuals who have access to other businesses or entities that utilize this integrated account. This suspension as it pertains to administrator rights involving businesses or entities other than CBSG and Full Spectrum shall only last as long as required for the Receiver to ensure that the electronic data of the Receivership Entities is being properly preserved in accordance with the Receiver’s Authority Over Electronic Data, or until the Receiver can take appropriate action to separate the data of those other entities from the data of CBSG and Full Spectrum.

4. Any employees of CBSG or Full Spectrum who accessed, downloaded, or modified any electronic files from the G Suite account shall preserve all such documents within their personal possession and provide copies of those documents to the Receiver’s counsel within two (2) business days, and thereafter destroy and not retain any copies within their possession.

5. All lawyers who have appeared in this action for any of the Defendants to this action who, at any time from July 29, 2020, to the present, communicated with individuals who are or were formerly employees of CBSG or Full Spectrum regarding access to CBSG’s or Full

Spectrum's data from G Suite or any other electronic sources shall preserve all communications with these employees and produce such communications to the Receiver's counsel.

**DONE AND ORDERED** in Ft. Lauderdale, Florida this 15th day of August, 2020.



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**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

cc: counsel of record