

**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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**BROADWAY ADVANCE’S REPORT OF DISCUSSIONS WITH RECEIVER**

Comes now Broadway Advance LLC, (“Broadway”) by and through its undersigned attorney, and reports to the Court its discussions with the Receiver’s counsel regarding Broadway’s Motion for Clarification of the Court’s freeze order, and the Receiver’s decision to ask the court to clarify its Order to unfreeze Broadway’s funds and states as follows:

1. Undersigned counsel has engaged in a number of conversations with Gaetan Alfano, counsel for the Receiver.
2. This morning Mr. Alfano informed undersigned counsel that the “Receiver does not oppose the release of the frozen funds. The Receiver’s position is limited to this limited issue and he reserves all rights with respect to Broadway Advance.”
3. Therefore Broadway would request that the Court issue a clarifying Order which, in effect provides that the funds held by Actum Processing for Broadway Advance LLC are not funds which should be frozen pursuant to any of the Orders issued by this Court.

Respectfully submitted,

Shahady & Wurtenberger, P.A.

By: /s/ Fred A. Schwartz  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 22, 2020 I electronically filed the foregoing with the Clerk of the Southern District of Florida.

/s/ Fred A. Schwartz