

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

COMPLETE BUSINESS SOLUTIONS  
GROUP, INC. D/B/A/ PAR FUNDING, ET  
AL.,

Defendants, et al.

CASE NO.: 20-CIV-81205-RAR

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR  
DEFENDANTS JOHN GISSAS AND RETIREMENT EVOLUTION ENTITIES**

Pursuant to Local Rule 11.1, undersigned counsel and law firm, Holland & Knight, LLP (collectively, “Counsel”), move unopposed to withdraw as counsel for Defendants John Gissas and Retirement Evolution Group, LLC, Retirement Evolution Income Fund, LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC (the “Corporate Defendants”), and state as follows:

1. In 2020, Counsel appeared in this action on behalf of Mr. Gissas and the Corporate Defendants. *See* ECF Nos. 53 and 188.

2. The Court’s August 13, 2020 Amended Order Appointing Receiver terminated Counsel’s appearances for the Corporate Defendants and designated the Receiver as representing their interests. *See* ECF No. 141.

3. Mr. Gissas has reached a settlement in this action with the Securities and Exchange Commission (“SEC”) and the Court has entered final judgment against him. *See* ECF No. 1133.

4. Pursuant to Local Rule 11.1(d)(3)(A), Counsel has provided notice of this motion to Mr. Gissas, and counsel for the SEC and the Receiver, who do not oppose the motion. The current mailing address for Mr. Gissas is 3990 East SR 44, Wildwood, FL 34785.

WHEREFORE, Counsel requests that the Court enter an Order granting their unopposed withdrawal as counsel in this action on behalf of John Gissas, Retirement Evolution Group, LLC, Retirement Evolution Income Fund, LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC, and removing them from the CM/ECF service list in this action. The undersigned is submitting a proposed Order to the Court.

Dated: August 4, 2022

Respectfully submitted,

**HOLLAND & KNIGHT LLP**

701 Brickell Avenue, Suite 3300

Miami, Florida 33131

Tel: (305) 374-8500

Fax: (305) 789-7799

By: /s/ Allison Kernisky

Daniel I. Small (FBN 42579)

[Daniel.Small@hklaw.com](mailto:Daniel.Small@hklaw.com)

Allison Kernisky (FBN 41160)

[Allison.Kernisky@hklaw.com](mailto:Allison.Kernisky@hklaw.com)

Chad M. Vanderhoef (FBN 109595)

[Chad.Vanderhoef@hklaw.com](mailto:Chad.Vanderhoef@hklaw.com)

*Counsel for Defendant John Gissas, Retirement Evolution Group, LLC, Retirement Evolution Income Fund, LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 4, 2022, 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/ Allison Kernisky  
Allison Kernisky

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**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION TO WITHDRAW**

**THIS CAUSE** comes before the Court upon the Unopposed Motion to Withdraw as Counsel for Defendants John Gissas, Retirement Evolution Group, LLC, Retirement Evolution Income Fund, LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC, filed by the law firm of Holland & Knight, LLP and attorneys Daniel I. Small, Allison Kernisky, and Chad M. Vanderhoef. Having reviewed the Motion and being otherwise fully advised, it is hereby

**ORDERED AND ADJUDGED** as follows:

1. The Motion is **GRANTED**.
2. Holland & Knight, LLP, Daniel I. Small, Allison Kernisky, and Chad M. Vanderhoef are hereby withdrawn as counsel and relieved of any further responsibility as counsel for Defendants John Gissas, Retirement Evolution Group, LLC, Retirement Evolution Income Fund, LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC. The clerk is directed to remove them from the CM/ECF service list in this action.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_\_ day of August, 2022.

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RODOLFO A. RUIZ II  
UNITED STATES DISTRICT JUDGE

Cc: Counsel of Record