

**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.

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**RECEIVER’S JOINDER IN SEC’S RESPONSE IN OPPOSITION  
TO THE “SECURED CHEHEBAR’S MOTION TO INTERVENE”**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,<sup>1</sup> hereby gives notice of his joinder in Plaintiff Securities and Exchange Commission’s

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<sup>1</sup> The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding; Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Investment Fund 2 LP; MK Corporate Debt Investment Company LLC; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consultants, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; Liberty Eighth Avenue LLC; The LME 2017 Family Trust; Blue Valley Holdings, LLC; LWP North LLC; 500 Fairmount Avenue, LLC; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management LLC; and ALB Management, Inc., and the Receivership also includes the property located at 107 Quayside Drive, Jupiter, Florida 33477.

(“SEC”) response in opposition [ECF No. 1851] (the “SEC’s Response”) to non-parties GEMJ Chehebar GRAT, LLC, Albert Chehebar, Isaac Shehebar, Isaac Shehebar 2008 AIJJ Grantor Retained Annuity Trust, Michael Chehebar, Ezra Shehebar, Ezra Chehebar, Ezra Shehebar LLC, Cherie Chehebar, Josef Chehebar, Steven Chehebar, and Joyce Chehebar’s (the “Movants”) motion to intervene in this action [ECF No. 1842] (the “Motion to Intervene”).

The Receiver adopts and incorporates the SEC’s Response as if fully set forth herein. As the SEC has correctly explained, the Movants have not demonstrated that their requested intervention as a party in this case is necessary or appropriate. Through their Motion to Intervene, the Movants are asking the Court to determine whether they hold a priority interest over the assets of CBSG based on certain UCC-1 financing statements. The Movants have already confirmed, however, that they intend to litigate the issue of their purported priority lien interests within the context of the Receiver’s Motion to (i) Approve Proposed Treatment of Claims and (ii) for Determination of a Ponzi Scheme [ECF No. 1843] (the “Claims Motion”).<sup>2</sup>

Specifically, Movants requested leave from this Court to file a 40-page response to the Receiver’s Claims Motion to address, among other things, “the validity of [their] UCC liens.” [ECF No. 1849]. The Court has permitted Movants to file a 20-page response to the Claims Motion. [ECF No. 1852]. Thus, the Movants already have the opportunity to present this issue to the Court for consideration. To require the Receiver to brief this same issue as part of two (or more) separate motions is unnecessary and would risk diverting valuable receivership resources away from this case. The Motion to Intervene should be denied.

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<sup>2</sup> It is the Receiver’s position that the question of whether Movants are entitled to a priority interest over CBSG’s assets should not be addressed now, as part of the Claims Motion. Rather, following the Court’s ruling on the Claims Motion, the Receiver will present this issue to the Court for consideration as part of the Receiver’s future motion to establish a plan of distribution, through which the Receiver will ask the Court to determine, among other things, the order of priority among the various categories of claimants for the distribution of the assets of the Receivership Entities.

Dated: May 1, 2024

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 1, 2024, 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/ Timothy A. Kolaya  
TIMOTHY A. KOLAYA