

**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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**NOTICE AND REQUEST FOR EXCLUSION**

**BE ADVISED THAT**

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  
Joyce Chehebar

**GIVE NOTICE**

That they (collectively referred to as the “SCIs”) presently intend to opt out of the Settlement Agreement and proposed Opt-Out Bar Order when those matters are addressed at the Final Approval Hearing on February 26, 2025. ECF Nos. 2081, 2081-1, 2082.

The SCIs are engaged in ongoing discussions with the Receiver concerning this matter, and if those discussions are resolved such that the SCIs do not intend to opt out at the Final

Approval Hearing, they will file an Amended Notice prior to the Final Approval Hearing. ECF No. 2082 at p.5; *Id.* at p.9 (“**If...requests for exclusion are resolved before the hearing, the Court may cancel the Final Approval Hearing.**”) (emphasis in original).

In the event the SCIs have not changed their position prior to the Final Approval Hearing, the SCIs respectfully request that they be permitted to appear and present their requests to the Court.

Dated: February 13, 2025.

Respectfully submitted,

s/ Marshall Dore Louis

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#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of this Notice is being served this 13th day of February 2025, upon all parties and their representatives who receive service of documents through CM/ECF in this matter, and those individuals listed on the attached Service List via US Mail and Email.

s/ Marshall Dore Louis

Marshall Dore Louis

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