

At IAS Part 3 of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse located at 60 Centre Street, New York, New York on the 30th day of April 2025

PRESENT: Hon. Joel M. Cohen  
J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

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JEFFREY SIMPSON, individually and derivatively,  
as managing member of JJ ARCH LLC,  
suing derivatively as managing member of  
ARCH REAL ESTATE HOLDINGS LLC,  
and JJ ARCH LLC,

*Plaintiffs,* Index No. 158055/2023  
-against- Justice Joel M. Cohen

JARED CHASSEN and FIRST REPUBLIC BANK,

MS 024

*Defendants.*

-----x  
JARED CHASSEN, individually and derivatively  
on behalf of JJ ARCH LLC, as member,  
and derivatively on behalf of  
ARCH REAL ESTATE HOLDINGS LLC,  
as member of JJ ARCH,

*Counterclaim Plaintiff,*  
-against-

JEFFREY SIMPSON and YJ SIMCO LLC,

*Counterclaim Defendants,*  
-and-

JJ ARCH LLC and  
ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendants.*

-----x  
608941 NJ, INC.

*Plaintiff,*

-against-

JEFFREY SIMPSON, JJ ARCH LLC and ARCH REAL  
ESTATE HOLDINGS LLC,

*Defendants,*

-and-

ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendant.*

**WARNING:**

**YOUR FAILURE TO APPEAR IN COURT  
MAY RESULT IN YOUR IMMEDIATE ARREST  
AND IMPRISONMENT FOR CONTEMPT OF COURT.**

**NOTICE:**

**THE PURPOSE OF THE HEARING UPON THE FOLLOWING  
APPLICATION IS TO PUNISH THE ACCUSED FOR CONTEMPT OF  
COURT, AND THAT SUCH PUNISHMENT MAY CONSIST OF FINES OR  
IMPRISONMENT OR BOTH, ACCORDING TO LAW**

**ORDER TO SHOW CAUSE**

Upon the annexed affirmation of Jared Chassen, together with its exhibits, the annexed affirmation of Allen Schwartz, together with its exhibits, the memorandum of law, and all documents cited to NYSCEF in the annexed papers, and all pleadings and proceedings had herein:

LET Jeffrey Simpson (“Simpson”) show cause before this Court, at IAS Part 3, Room 208, at the Courthouse located at 60 Centre Street, New York, New York on **May 12, 2025 at 2:30 PM** or as soon thereafter as counsel can be heard, why an order should not be entered:

- (1) pursuant to New York Judiciary Law § 753, the Court’s inherent powers, and all other relevant provisions, holding and adjudging Simpson in civil contempt of the following Court orders: (i) the November 18, 2024 Temporary Restraining Order (NYSCEF No. 941), (ii) the March 7, 2025 Decision and Order (NYSCEF No. 1352); and (iii) the March 11, 2025 Order Appointing Temporary Receiver (NYSCEF No. 1360) (collectively, the “Orders”); and
- (2) pursuant to New York Judiciary Law § 750, the Court’s inherent powers, and all other relevant provisions, holding and adjudging Simpson in criminal contempt of the Orders; and
- (3) pursuant to New York Judiciary Law § 774, the Court’s inherent powers, and all other relevant provisions, ordering Simpson immediately fined and incarcerated until he complies with each of his obligations under the Orders; and
- (4) pursuant to New York Judiciary Law § 773, the Court’s inherent powers, and all other relevant provisions, fining Simpson and awarding Chassen and JJ Arch damages in an amount to be determined at a post-hearing inquest or through post-hearing submissions; and
- (5) pursuant to New York Judiciary Law § 751, the Court’s inherent powers, and all other relevant provisions, imposing a 30-day order of incarceration and fine of \$1000 as a punishment for Simpson’s criminal contempt of the Orders; and

(6) pursuant to 22 N.Y.C.R.R. § 130-1, the Court's inherent powers, and all other relevant provisions, sanctioning Simpson; and

(7) granting such other and further relief as the Court deems just and proper.

SUFFICIENT CAUSE HAVING BEEN ALLEGED, it is:

ORDERED that opposition to this motion, if any, shall be e-filed on NYSCEF on or before May 7, 2025, 2025; and it is further

ORDERED that reply, if any, shall be e-filed on NYSCEF on or before May 9, 2025 at 12:00 pm;

LET service of this Order and annexed affidavits upon Jeffrey Simpson and his counsel via NYSCEF on or before May 2, 2025 be deemed good and sufficient service thereof.

ENTER:



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Hon. Joel M. Cohen, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

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Index No. 158055/2023

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-and-

ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendant.*

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**JARED CHASSEN'S MEMORANDUM OF LAW IN SUPPORT OF MOTION SEEKING  
TO HOLD JEFFREY SIMPSON IN CONTEMPT AND TO SANCTION HIM**

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## INTRODUCTION

Since Jared Chassen first moved for the appointment of a temporary receiver over JJ Arch LLC almost a year and half ago, Jeffrey Simpson has repeatedly defied the Court to stymie any appointment.<sup>1</sup> In March 2024, Simpson avoided Chassen's January 2024 receiver motion by putting JJ Arch into an adjudicated bad-faith bankruptcy so that Chassen's first receiver motion was never heard.<sup>2</sup> In the last two months, however, Simpson has escalated his defiance, openly and unabashedly disobeying the Court and the "NYS system" he proclaims to be illegitimate and "a mockery on society."<sup>3</sup>

After a multi-day evidentiary hearing in February 2025, the Court granted Chassen's second receiver motion, and entered an order appointing a temporary receiver, Mr. Eric Huebscher (together, the "Receiver Orders").<sup>4</sup> The Receiver Orders gave the Receiver control of the JJ Arch controlled entities, including 1640 Montauk LLC, 1640 Motors LLC, and 225 HPR LLC, and the properties and assets that they own.<sup>5</sup> The Receiver Orders also directed Simpson, among other things, not to interfere with the Receiver's exercise of his duties, and to provide specific information to the Receiver.

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<sup>1</sup> NYSCEF Nos. 485-520, First Receiver Motion.

<sup>2</sup> *In re JJ Arch LLC*, 663 B.R. 258, 275-290 (Bankr. S.D.N.Y. 2024) (among other things, finding that bankruptcy was filed in subjective and objective bad faith).

<sup>3</sup> NYSCEF No. 1424, Simpson Apr. 14, 2025 *Ex Parte* Email.

<sup>4</sup> NYSCEF Nos. 1346, 1352, 1360, 1371, 1434.

<sup>5</sup> NYSCEF No. 1360.

Unfortunately, even though the Receiver Orders were entered almost two months ago, Simpson continues to defy the Court even while Simpson already faces a long-standing pending contempt motion for his defiance of other orders. (Mot. Seq. No. 13). And since the entry of the Receiver Orders, Simpson has abused the Receiver and expelled him.

First, to collaterally attack the Receiver Orders, Simpson removed this case to federal court even though he was the plaintiff, and this case has no federal claims.<sup>6</sup> When the federal court entered an order on March 25, 2025 that said it would take no action in the case until Simpson paid the filing fee—and gave him 30 days to do so—Simpson took advantage and did not pay the fee, while paying the fee in two other cases he removed.<sup>7</sup>

Next, Simpson used the lull from the removal attempt to twice expel the Receiver from Rever Motors, a business owned and operated by 1640 Motors and 1640 Montauk, abused the Receiver, called 911 on him, interfered with his control of other properties, refused to give him any records so that he can undertake an accounting, and wrote a JJ Arch lender, when the Receiver requested a payoff statement, that the Court and the Receiver were “on the take.”<sup>8</sup>

Now, as of the filing of this motion, and even after the remand, the Receiver remains unable to take control of Rever Motors and the real property on which it is housed, and the real property owned by 225 HPR LLC.<sup>9</sup> The Receiver does not have JJ Arch’s records because

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<sup>6</sup> NYSCEF Nos. 1380-1385, 1387-1389, 1402-1409.

<sup>7</sup> Ex. 1 to the Affirmation of Allen Schwartz, Esq. (“Schwartz Affirm”) submitted with this motion; NYSCEF No. 1411, Order Remanding Action.

<sup>8</sup> NYSCEF No. 1436, Huebscher Affirm.; NYSCEF No. 1438, Police Report; NYSCEF No. 1445, Simpson Mar. 28, 2025 Email to Lender.

<sup>9</sup> NYSCEF No. 1436, Huebscher Affirm.; NYSCEF No. 1435, Order to Show Cause.

Simpson refuses to provide any information. In the meanwhile, Simpson has transferred thousands of dollars from Rever Motors and refused to identify the recipients of those funds.<sup>10</sup> The Receiver has been forced to file an Order to Show Cause to get control via a proposed order directing the Suffolk County Sheriff to act, with Simpson's disobedience of the Receiver Orders now itself depleting any remaining assets of JJ Arch because Simpson is forcing the Receiver to incur the expense of motion practice, ensuring by his ongoing defiance that there will be little money remaining in JJ Arch.<sup>11</sup>

"[T]he credibility of court orders and the integrity of our judicial system" cannot be maintained if "a litigant can[] ignore court orders with impunity." *Gibbs v St. Barnabas Hosp.*, 16 N.Y.3d 74, 81 (2010) (citations and quotations omitted). Simpson's conduct now, and over the past two years, makes clear that Simpson is not going to obey this Court's orders until the Court enforces them with its contempt powers. A contempt order, with its attendant penalties, is essential to both restoring the Court's dignity and forcing immediate compliance with the Receiver Orders.

### **FACTUAL BACKGROUND**

#### **A. Simpson's Defiance of the November 2024 TRO**

In January 2024, Chassen moved for the appointment of a temporary receiver over JJ Arch, the entity in which both Chassen and Simpson are members. NYSCEF Nos. 485-520, First Receiver Motion. But before the receiver motion could be heard, Simpson filed a bad-faith JJ Arch bankruptcy in defiance of this Court's prior orders that had restored him to managerial

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<sup>10</sup> Affirmation of Jared Chassen submitted with this motion ("Chassen Affirm") at ¶¶ 11-12.

<sup>11</sup> NYSCEF No. 1435-1447, Receiver's Motion.

control subject to Chassen's consent rights to major decisions. NYSCEF No. 732, Bankruptcy Petition.

In October 2024, after the dismissal of Simpson's bad-faith JJ Arch bankruptcy, Chassen moved for an order allowing or enforcing his removal of Simpson as a member of JJ Arch, to vacate or modify the Court's prior orders restoring Simpson to managerial control of JJ Arch, and to hold Simpson in civil and criminal contempt of the Court's prior orders. NYSCEF Nos. 711-756, Chassen Preliminary Injunction Motion.

On November 18, 2024, this Court issued an order requiring Simpson to "immediately provide and continue to provide" Chassen with records and account access for JJ Arch and the entities it controls:

ORDERED that Simpson immediately provide, and continue to provide, Chassen with (1) complete access to the bank accounts of JJ Arch and its Investment Entities (as defined in the JJ Arch LLC Operating Agreement), (2) JJ Arch and its Investment Entities' books and records as previously requested by Chassen in his books and records demands, and (3) a complete listing of all transactions at JJ Arch and its Investment Entities during the pendency of the bankruptcy proceeding . . .

*See* NYSCEF No. 941, TRO.

Despite a pending contempt motion, Simpson immediately defied the TRO. *See* NYSCEF Nos. 1372-1378, March 19, 2025 Chassen Affirm. Simpson even copied the Court on correspondence where he refused to comply with the Court's TRO. NYSCEF No. 1248-1249.<sup>12</sup> To this day, Simpson has refused to comply with the TRO, failing to make available the books or records to Chassen or provide a ledger of his transactions during the JJ Arch bankruptcy.

Chassen Affirm. ¶ 7.

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<sup>12</sup> Simpson was served with this order via personal service (NYSCEF No. 949), and via email (NYSCEF No. 1011), and was thus aware of it.

## B. The Receiver Orders

In December 2024, Chassen moved a second time for the appointment of a temporary receiver over the JJ Arch controlled entities, this time in the alternative of his request for injunctive relief. NYSCEF Nos. 994-1000, Second Receiver Motion. The Court held a two-day evidentiary hearing on February 25, 2025 and February 28, 2025, and heard oral argument on March 5, 2025. NYSCEF No. 1346, Feb. 25, 2025 Hr. Tr.; NYSCEF No. 1371, Feb. 28, 2025 Hr. Tr.; NYSCEF No. 1434, March 5, 2025 Hr. Tr. On March 8, 2025, the Court granted Chassen's motion to appoint a temporary receiver and entered an order appointing Eric Huebscher as the receiver on March 11, 2025. NYSCEF No. 1352, Decision and Order; NYSCEF No. 1360, Order Appointing Temporary Receiver.

Simpson's conduct in the leadup to the evidentiary hearing was highly erratic. On February 9, 2025, for example, Simpson sent an email directly to the Court in which he asserted that this:

is a court of non-competent jurisdiction, who has been biased since the first day and has made rulings that are not at all practical or thoughtful or considerate to anything or anyone here especially when you can't even remember what it is you offered in a prior order or transcript. So you may not like my tone and you may criticize me and tell me that I'm not being proper but again if someone took from you what's been taken for me I would love to see what your tone will be like . . . All right reserved and yes I am copying every possible avenue of the NY court system that I know because there's no justice here. I will forward along later to the Southern District and make sure that all the judges who have touched this case have also seen what's going on here because it is not lawful.

NYSCEF No. 1132, Simpson Feb. 9, 2025 Email.

Simpson sat for a deposition on February 13, 2025, during which he lobbed abuse at counsel: "You're scum. Yeah, scum lying garbage you are. Keep going. Keep going. You lied to the Court literally. Keeping lying. Keep going . . . I can't believe the bar gives you a license."

NYSCEF No. 1374, Simpson Dep. Tr. at 115:17-25. Simpson called counsel a “disgusting lawyer,” *id.* at 322:20-10, and told him that “I think you’re a lying, cheating thief.” *Id.* at 280:5-12. Simpson also called counsel a “disgusting pig,” and said ominously “You’ve lied to the Court every single time. Go ahead. That’s okay. We’ll have an investigation of you of a different kind.” *Id.* at 183:3-24.

### C. Simpson’s Defiance of The Receiver Orders

Simpson immediately defied the Receiver Orders. While the Receiver Orders barred him from transferring funds outside the ordinary course of business, Simpson made large wire transfers and refused to disclose the recipients of those transfers and directed Citizens Bank not to share this information. Chassen Affirm. Ex. 1, Bank Statement; Chassen Affirm., Ex. 2, Bank Printout; NYSCEF No. 1377, Simpson Mar. 13, 2025 Email.

And while the Receiver Orders barred Simpson from interfering with the Receiver, (NYSCEF No. 1360 at 6), at 11:20 p.m. on March 19, 2025, Simpson e-filed on NYSCEF a purported notice of removal that was post-dated to March 20, 2025, done for the purpose of interfering with the Receiver. NYSCEF No. 1380-1382, Notice of Removal. At 3:53 a.m. and 5:39 a.m. on March 20, 2025, Simpson then sent *ex parte* emails to the Court and federal judges stating that he was removing the cases to federal court. NYSCEF No. 1383-1. The Court posted these emails on NYSCEF and invited the parties to file letters indicating their position on the legal effect of Simpson’s *ex parte* emails and post-dated notice of removal. NYSCEF No. 1383, Court Notice. Simpson responded by letter on NYSCEF that he was “dumbfounded” by this, and told the Court that “you will learn, I am and was a very effective leader by making informed and educated decisions and moving forward. This is not a ‘free for all’, *it is my business that you*

*invaded in ways that are unconscionable.”* NYSCEF No. 1384, Simpson March 20, 2025 Letter to Court (emphasis added).

Next, Simpson filed an email to NYSCEF that he had sent to Judge Koeltl of the Southern District of New York at 1:39 p.m. on March 20, 2025 in which he said “We have told the NYS judge that he is biased on numerous occasions . . . [m]y instinct is that he will not ‘surrender’ to my Removal action until he is Ordered to do so.” NYSCEF No. 1387, Simpson Email to Judge Koeltl. Later that day, he again wrote the Court on NYSCEF telling the Court “It is that you are simply fearful for your wrongdoings and bias nature of your role on the bench that you cannot help yourself but attack the most successful guy in the room (before you have attempted to ruin my life by bad orders, bias commentary and simply swallowing your own words from one hearing to another) . . . I will not be communicating with this Court again unless I am told otherwise by a higher power in the Federal Court.” NYSCEF No. 1389, March 20, 2025 Letter to Court.

On March 24, 2025, Simpson filed on NYSCEF a letter addressed to the “NYS Court,” in which he told the Court that he had called the police on the Receiver after the Receiver entered the business owned by 1640 Motors LLC and 1640 Montauk LLC—entities in receivership—and prevented the Receiver from fulfilling his duties despite the Court’s order that he could not interfere with the receiver’s exercise of his duties. NYSCEF No. 1406, March 24, 2025 Letter to Court.

The Receiver has testified that Simpson verbally assaulted him and had him removed from Rever Motors on March 24, 2025. NYSCEF No. 1436, Huebscher Affirm. at ¶¶ 10-17. In the police report of the incident indicates that Simpson told the police that the Receiver Orders had been dismissed. NYSCEF No. 1438, Police Report. And Simpson repeatedly touted his

expulsion of the Receiver in further correspondence to this Court. NYSCEF No. 1406, March 24, 2025 Letter to Court; NYSCEF No. 1444, Simpson Apr. 8, 2025 Email; NYSCEF No. 1441, Simpson Apr. 12, 2025 Email.

On March 25, 2025, Simpson filed evidence that he had effectuated the removal to federal court by filing screenshots of the ECF docket, and that day the Commercial Division issued a notice stating that it would take no further action until it received an order of remand from the federal court, whole making it clear that “[a]ll orders of this Court entered prior to removal, including the appointment of a receiver, remain in effect subject to any contrary orders made in the federal action.” NYSCEF No. 1409, Court Notice.

Simpson then directed a lender of the entities subject to the receivership not to give a payoff statement to the receiver, claiming that the receiver had no authority because of this removal. NYSCEF No. 1445, March 28, 2025 Email. In this email, Simpson also impugned the Court and the Receiver, telling the lender that the Court and the Receiver were “on the take.” *Id.*

On April 8, 2025, after business hours, Simpson emailed the Receiver telling him to “stand down” and that if he didn’t, Simpson would pursue him “because you’re out of line just like the day you showed up and I told the police to get you out of my property.” NYSCEF No. 1444, Simpson Apr. 8, 2025 Email.

On April 12, 2025, Simpson wrote the Receiver, copying this Court, telling him that he had no authority or jurisdiction, and telling him “I remind you how you invaded the property at 1640 Montauk improperly and the police removed you for trespassing. You have also tried to invade the bank accounts this past week . . .” NYSCEF No. 1441, Simpson Apr. 12, 2025 Email.

On April 14, 2025, Simpson wrote the federal court, copying the Receiver, and saying that this Court is “either clueless or intentionally looking the other way”:

Dear SDNY (prose intake for Judge Swain)

I'm sorry to send email this way, I don't have access to ECF filing. These folks don't stop their harassment. Per my note over the weekend, we need Court intervention. I literally left my family in the middle of Passover because of the anxiety of this malfeasance that continues.

And yet again I find another incident where this individual Eric Huebscher seems to think he's above the law and he could just trespass and cause issues at my properties. He was not installed with good merit or with any authority on the person that made the action because that individual, Jared Chassen, committed perjury to the federal and state court in order to achieve his goals. I am pleading with the court to help me stop this nonsense now. No one should live this way with people attacking everything they've ever built and ***State Court that is either clueless or intentionally looking the other way to the bad acts that are occurring for almost 2 years now.***

I did a visit with the FBI (white collar crime unit) this morning to give them further briefing of the destruction that's happening surrounding this case, I cannot say if they will or will not further investigate the illegal and improper actions that are recurring from the other parties here. I have been pleading to the southern district since December 2024 that the matters are urgent and the attacks are against my civil rights and my constitutional rights. I plead with the court to stop this madness and allow for a chance to explore and investigate exactly what has happened here properly with due process, with witnesses, with evidence with an unbiased court. The damages to me and others escalate by the day while these folks continue to break the law without any enforcement whatsoever. Given that this situation is in Southampton I am now waiting for the Southampton police to arrive to hopefully take a report on this for the record.

NYSCEF No. 1442, Simpson Apr. 14, 2025 Email (emphasis added).

Simpson then forwarded this email to this Court in an *ex parte* email, taunting the Court about his removal of this action:

It looks like the honorable Joel Cohen wasn't copied on the last response. It's important to see the fruits of your labor whereby your biased view has caused serious destruction for me (and \$100 million of investors) without any merit or cause or relevance but somehow you're sitting on the bench making these rulings without any merit. Send it to all parties if you like, again as you you'll see below I've brought this up not only to the CJC now but it's also brought it to the FBI, to find justice, not this version that is extremely biased and prejudiced against me with no merit.

Yes, the administrative judges are copied here too and I hope they finally pay attention to the actions of what you've taken and the damage that you've caused for a \$1 billion company that I built. It was not for your court to step in and cause this destruction for a crook and a criminal who is stealing from me but you have the nerve to somehow just prejudice me because you don't like me. That's not how it works as an elected official and certainly not as a judge. I hear you are doing it to others where you have this issue with people that are pro business and you think you get to from your seat destroy people's lives based upon your opinion of what you think documents should've said or what you think people are entitled to rather than what they've earned or are contractually owed. ***The NYS system is a mockery on society and you sir You do not listen to anything with merit or facts.***

I've taken this to the authorities to the highest level because you've destructed a man who didn't deserve anything like this and the documents don't allow for it and you have the audacity to continue to defend yourself when you know you've made mistakes whereby I've shown you the issues that you've done and you refuse to adhere to them or listen because of an ego or something greater than that, that hopefully we learn in some sort of investigation, God willing.

Justice must be served in our country, it was not founded on the principles of this type of behavior from the bench of a major city like New York. It is beyond unconstitutional besides unethical and improper.

Have a nice day  
Jeffrey Simpson  
Sent from my iPhone

NYSCEF No. 1418, Simpson Apr. 14, 2025 Email (emphasis added).

On April 25, 2025, the federal court remanded this proceeding because Simpson did not pay the filing fee. NYSCEF Nos. 1410-1412.

On April 28, 2025, the Receiver filed a motion seeking to enforce the Receiver Orders. NYSCEF Nos. 1435-1445 (the "Receiver's Motion"). The Receiver's Motion makes clear that Simpson has defied the Receiver Orders since they were entered:

- **Expulsion from Rever Motors:** In addition to the March 24, 2025 expulsion, Simpson prevented the Receiver from taking control on April 24, 2025. This latter attempt was done with an armed guard "due to Simpson's threatening behavior toward me on March 24 . . ." NYSCEF No. 1436 at ¶¶ 18-22.

- **Contact by Phone and Text Message in Defiance of Order:** Simpson contacted the Receiver by phone—despite being directly prohibited from doing so in the Receiver Order—and threatened the Receiver. *Id.* at ¶ 20. Indeed, in an email he copied this Court on, he says, “I just called him on the phone and warned him one more time not to step foot on one of my properties . . .” NYSCEF No. 1440, Simpson Apr. 22, 2025 Email. He also sent a threatening text message directly to the Receiver, where he called him a “disgusting human,” a “money hungry pig,” and “the biggest crook I’ve ever met.” NYSCEF No. 1436, at ¶ 20.
- **Resisting the Receiver’s Control of 225 Head of Pond Road:** Simpson changed the locks at the real property at 225 Head of Pond Road. *Id.* at ¶¶ 25-31.
- **Refusal to Provide any Books and Records:** Simpson provided no books and records or other information required by the Receiver Order. *Id.* at ¶¶ 32-34.
- **Interference with a Lender:** Simpson directed a lender not to give the receiver information about a loan. *Id.* at ¶ 35.

Simpson has also continued to transfer assets belonging to Rever Motors and refused to identify the recipients of these funds to Mr. Chassen. Chassen Affirm. Ex. 1, Bank Statement; Chassen Affirm., Ex. 2, Bank Printout; NYSCEF No. 1377, Simpson Mar. 13, 2025 Email. When Chassen asked Citizens Bank to identify the recipients of transfers, Simpson directed Citizens Bank not to give Chassen that information. *Id.*

## ARGUMENT

### I. The Court should hold Simpson in civil contempt because he is disobeying Court Orders to Chassen and JJ Arch’s prejudice

To sustain a finding of civil contempt under N.Y. Jud. § 753, the movant must establish that a lawful order clearly expressing an unequivocal mandate was in effect, that the order was

disobeyed, and that the contemptor had knowledge of the order. *Town of Copake v. 13 Lackawanna Props., LLC*, 73 A.D.3d 1308, 1309 (3d Dep’t 2010). Civil contempt “is designed to compensate the injured private party for the loss of or interference with the benefits of the mandate.” *McCain v. Dinkins*, 84 N.Y.2d 216, 226 (1994). Thus, prejudice is also an element of civil contempt. *U.S. Bank N.A. v. Sirota*, 189 A.D.3d 927, 930 (2d Dep’t 2020).

Ultimately, Simpson’s beliefs as to the invalidity and wrongfulness of the orders will be no defense because “[a] good faith belief that a court order is improper or unlawful will not render the order unlawful nor will it excuse willful disobedience.” *Matter of Rankin*, 78 Misc. 3d 337, 345 (Kings Co. 2023) (citations omitted). “[I]t is elemental that a contemnor may not question the validity of the order violated.” *Mount Sinai Hosp., Inc. v. Davis*, 8 A.D.2d 361, 363 (1st Dep’t 1959).

The Receiver Orders barred Simpson from interfering with the Receiver’s exercise of his duties. NYSCEF No. 1360 at 6. But since the entry of the Receiver Orders, Simpson has only interfered with the Receiver’s exercise of his duties.

First, Simpson filed a frivolous removal of this action with the express purpose of interfering with the Receiver and his duties. See NYSCEF Nos. 1380-1385, 1387-1389, 1402-1409. Simpson’s counsel, Robert Lorenc, tellingly did not file this frivolous removal, which Simpson instead filed purportedly *pro se*. Simpson removal was not only done in bad faith to stymie the Receiver Orders and avoid a March 27, 2025 contempt hearing on Mot. Seq. No. 13, but had no legal support since under 28 U.S.C. §§ 1441(a) and 1446(a) “only a defendant can remove an action to federal court.” *Burchette v Gladsten*, No. 24-CV-4901 (LTS), 2024 U.S. Dist. LEXIS 159051, at \*3 (S.D.N.Y. Aug. 26, 2024) (citing 28 U.S.C. §§ 1441(a) and

1446(a)).<sup>13</sup> Further, there are no federal claims in this action, and Simpson's claim that this Court violated his due process rights does not provide a "basis for removing the state court proceeding to federal district court." *Cabrera v Lagerstrom*, No. 23-CV-7852 (LTS), 2023 U.S. Dist. LEXIS 160091, at \*6 (S.D.N.Y. Sep. 11, 2023) (quoting *Citibank, N.A. v Swiatkoski*, 395 F. Supp. 2d 5, 9 (E.D.N.Y. 2005). Simpson's removal was also untimely and done without the consent of the defendants. *Taylor v Medtronic, Inc.*, 15 F.4th 148, 153 (2d Cir. 2021). (citing 28 U.S.C. § 1446(b)(2)(A)).

In any event, this Court made clear to Simpson that upon removal the Receiver Order remained in effect absent a contrary order from the federal court. NYSCEF No. 1409, Court Notice. Nonetheless, Simpson continued to disobey the Receiver Orders:

- Simpson twice expelled the Receiver from Rever Motors, leaving the Receiver without control. NYSCEF No. 1436, Huebscher Affirm. at ¶¶ 10-22.
- Simpson prevented the Receiver from taking control of the real property at 225 Head of Pond Road, Water Mill, New York, leaving the Receiver without control. *Id.* at ¶¶ 25-31.
- Simpson refused to comply with his books and records obligations, impairing the Receiver's ability to prepare tax filings and undertake an accounting. *Id.* at ¶¶ 32-24.
- Simpson threatened the Receiver by phone even though barred by the Receiver Order and interfered with the Receiver's efforts to obtain a payoff statement from a JJ Arch lender. *Id.* at ¶¶ 20, 22.
- Simpson made transfers from the Rever Motors bank account, while refusing to disclose the identity of the recipients and while directing Citizens Bank not to give this information to Chassen. Chassen Affirm. Ex. 1, Bank Statement; Chassen Affirm., Ex. 2, Bank Printout; NYSCEF No. 1377, Simpson Mar. 13, 2025 Email.

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<sup>13</sup> See also *Home Depot U.S.A., Inc. v Jackson*, 587 U.S. 435, 441 (2019); *Broad Coverage Serv. v Oriska Ins. Co.*, No. 20-CV-11108 (PMH), 2021 U.S. Dist. LEXIS 4900, at \*2 (S.D.N.Y. Jan. 11, 2021) (holding that third party defendants may not remove an action).

And even before disobeying the Receiver Orders, Simpson had defied the November 2024 TRO, entered in connection with the already pending contempt motion, which required that he “immediately provide” Chassen with the books and records he requested, a ledger of the bankruptcy transactions, and bank account viewing access. Simpson did not provide account viewing access until February 2025 and has never provided the books and records and the ordered transaction ledger. NYSCEF No. 1372 at ¶ 19.

Chassen has been prejudiced by Simpson’s disobedience because he obtained these orders to protect his interests in JJ Arch and these entities. The lengthy almost two-month ongoing delay in the Receiver being able to take control of JJ Arch, and Simpson’s defiance of these orders, prejudices Chassen. Further, Simpson has caused the Receiver to incur costs to enforce the Receiver Orders which will ultimately come out of JJ Arch, further depleting any remaining equity.

The Court should compel Simpson to immediately comply with the Court’s orders by, inter alia, ordering him incarcerated until he complies with the Receiver Orders. The Court should order an inquest, or supplemental submissions, to determine the amount of Chassen’s damages from Simpson’s contempt and from the delay in the Receiver being able to effectuate his duties, which should also include all legal fees, costs, and damages connected with the removal to federal court and the filing of this motion. Simpson should also be required to pay for any legal and other costs incurred by the Receiver in enforcing the Receiver Orders, as those costs should not be borne by JJ Arch, but by Simpson, who has necessitated the Receiver’s legal filings and other measures to gain control over JJ Arch property.

**II. The Court should hold Simpson in criminal contempt because Simpson's disobedience has been willful and has harmed the dignity of the Court and the respect for its mandates**

In contrast to civil contempt, “[c]riminal contempt [under N.Y. Jud. § 750] . . . involves an offense against judicial authority and is utilized to protect the integrity of the judicial process and to compel respect for its mandates” and “the aim in a criminal contempt proceeding is solely to punish the contemnor for disobeying a court order, the penalty imposed being punitive rather than compensatory.” *Dept. of Envtl. Protection v. Dept. of Envtl. Conservation*, 70 N.Y.2d 233, 239 (1987) (citations and quotations omitted). With criminal contempt, “[t]he proponent of a finding of criminal contempt must [also] demonstrate willfulness.” *Madigan v. Berkeley Capital, LLC*, 205 A.D.3d 900, 906 (2d Dep’t 2022) (citations omitted). Nonetheless, “[k]nowingly failing to comply with a court order gives rise to an inference of willfulness which may be rebutted with evidence of good cause for noncompliance.” *Id.* (citations and quotations omitted). “[A] hearing [for criminal contempt] is not necessary when there is no factual dispute as to [the party’s] conduct unresolvable from the papers on the motion.” *Id.* (citations and quotations omitted).

“A contempt of court ultimately may constitute a criminal contempt, a civil contempt, or both a criminal and a civil contempt.” *Matter of DeSiena v. DeSiena*, 167 A.D.3d 1006, 1007 (2d Dep’t 2018) (citations and quotations omitted). “Although the line between the civil and criminal contempt may be difficult to draw in a given case and the same act may be punishable as both a civil and a criminal contempt, the element which escalates a contempt to criminal status is the level of willfulness associated with the conduct.” *McCain*, 84 N.Y.2d at 226.

Simpson was aware of the Court’s orders, and his awareness of the orders gives rise to an inference of willfulness. *Madigan*, 205 A.D.3d at 906. Simpson’s willful defiance of the

Receiver Orders is also evident from his communications to this Court, where, for example, he tells this Court in an *ex parte* email that the “NYS system” is “a mockery on society.” NYSCEF No. 1418, Apr. 14, 2025 *Ex Parte* Email. Simpson’s repeated disobedience has injured the Court’s dignity and lessened the respect for its mandates, and warrants criminal contempt, which “is utilized to protect the dignity of the judicial system and to compel respect for its mandates.” *McCormick v. Axelrod*, 59 N.Y.2d 574, 583 (1983).

The Court should impose the maximum punishment for criminal contempt of 30 days imprisonment and a \$1000 fine.

**III. The Court should sanction Simpson pursuant to 22 NYCRR § 130-1.1 because Simpson’s conduct has been undertaken primarily to delay or prolong the resolution of this litigation, to harass and maliciously injure Chassen, and is completely without merit in law**

Under 22 NYCRR. § 130-1.1(a), “[t]he court, in its discretion, may award to any party . . . in any civil action or proceeding before the court . . . costs in the form of reimbursement for actual expenses reasonably incurred and reasonable attorney’s fees, resulting from frivolous conduct as defined in this Part.” *Id.* And “[i]n addition to or in lieu of awarding costs, the court, in its discretion may impose financial sanctions upon any party or attorney in a civil action or proceeding who engages in frivolous conduct as defined in this Part . . .” *Id.* Such costs and sanctions may be awarded against “a party to the litigation . . .” 22 NYCRR. § 130-1.1(b).

Conduct is frivolous when it is “completely without merit in law,” or “is undertaken primary to delay or prolong the resolution of the litigation” or is undertaken “to harass or maliciously injure another.” 22 NYCRR § 130-1.1(c). An award under this rule may be awarded not only by motion, but “on the court’s own initiative, after a reasonable opportunity to be heard.” 22 NYCRR § 130-1.1(d).

“[S]anctions and costs have been imposed for insulting behavior to opposing counsel, baseless ad hominem attacks against the court and opposing party, and mischaracterization of the record.” *Matter of Kover*, 134 A.D.3d 64, 74 (1st Dep’t 2015) (citing *Nachbaur v Am. Tr. Ins. Co.*, 300 A.D.2d 74, 75 (1st Dep’t 2002) (imposing sanctions where party directed insults at counsel, made “baseless, serious accusations against the motion court, [and []][made] unsupported accusations against defendant . . .”).

The record in this case is replete with Simpson’s insults and baseless accusations against the Court, the Receiver, counsel, and the parties. See e.g., NYSCEF No. 1374, Simpson Dep. Tr. at 115:17-25 (calling counsel “lying garbage”); *Id.* at 280:5-12 (calling counsel “disgusting pig”); NYSCEF No. 1436, at ¶ 20 (calling Receiver a “disgusting human,” a “money hungry pig,” and “the biggest crook I’ve ever met.”); NYSCEF No. 1445, Simpson Mar. 28, 2025 Email to Lender (baselessly accusing Court and Receiver of being “on the take”); NYSCEF No. 1389, March 20, 2025 Letter to Court (making baseless accusations of bias); NYSCEF No. 742 (calling Oak’s principals “disgusting pigs . . . thieves and criminals”); NYSCEF No. 739 (telling Chassen that “only thing else you knew to do was be a male prostitute. Maybe that’s what you’re going be pursuing now because you’re not able to do anything.”). Simpson should be sanctioned for his abusive conduct.

Further, Simpson has “engaged in a relentless series of harassing and abusive litigation tactics that constitute frivolous conduct . . .” *Nicotra v Dignam*, 2020 NY Slip Op 31934[U], \*29 (N.Y. Co. 2020). These include his bad-faith JJ Arch bankruptcy filing, (*In re JJ Arch LLC*, 663 B.R. at 275-290), his bad-faith removal of this proceeding to Bankruptcy Court, (*In re JJ Arch LLC*, Nos. 24-10381 (JPM), 24-1335 (JPM), 2024 Bankr LEXIS 1347, at \*33-47 (Bankr. S.D.N.Y. June 10, 2024), and his bad-faith removal of this proceeding last month. *Supra* at pgs.

12-13. Simpson's "obstructionist tactics" have "unduly prolonged the resolution" of this litigation and have "unnecessarily taxed the resources of the court as well." *Solow v Wellner*, 162 Misc 2d 565, 567 (App. Term. 1st Dep't 1994).

Simpson's non-compliance with the Court's orders also independently warrants sanctions under this provision. *See Matter of Grayson v NY City Dept. of Parks & Recreation*, 99 A.D.3d 418, 419 (1st Dep't 2012) ("Petitioners should not have had to resort to motion practice in order to enforce the April order. Here, sanctions are warranted to address the Parks Department's continuous pattern of conduct and deter future frivolous conduct.") (citations omitted).

### **CONCLUSION**

For the forgoing reasons, the Court should grant this motion in its entirety together with such other and further relief the Court deems just and proper.

Dated: New York, New York  
April 30, 2025

SCHWARTZ LAW PLLC

By: /s/  
Allen Schwartz, Esq.  
150 Broadway, Suite 701  
New York, New York 10038  
Tel: 347-460-5379  
[allen@allenschwartzlaw.com](mailto:allen@allenschwartzlaw.com)

*Counsel for Jared Chassen*

**WORD COUNT CERTIFICATION**

I, Allen Schwartz, Esq., certify that the foregoing Memorandum of Law contains less than 7000 words, as counted by Microsoft Word's word-processing system, excluding the caption, table of contents, table of authorities and signature block, and that it complies with the applicable word limits.

/s/  
Allen Schwartz

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

-----X  
JEFFREY SIMPSON, individually and derivatively,  
as managing member of JJ ARCH LLC,  
suing derivatively as managing member of  
ARCH REAL ESTATE HOLDINGS LLC,  
and JJ ARCH LLC,

*Plaintiffs*

Index No. 158055/2023

-against-

Justice Joel M. Cohen

JARED CHASSEN and FIRST REPUBLIC BANK,

*Defendants*

-----X  
JARED CHASSEN, individually and derivatively  
on behalf of JJ ARCH LLC, as member,  
and derivatively on behalf of  
ARCH REAL ESTATE HOLDINGS LLC,  
as member of JJ ARCH LLC,

*Counterclaim Plaintiff*

-against-

JEFFREY SIMPSON and YJ SIMCO LLC,

*Counterclaim Defendants*

-and-

JJ ARCH LLC and  
ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendants*

-----X  
608941 NJ, INC.

*Plaintiff*

-against-

JEFFREY SIMPSON, JJ ARCH LLC and ARCH REAL  
ESTATE HOLDINGS LLC,

*Defendants,*

-and-

ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendant*

-----x

**AFFIRMATION OF ALLEN SCHWARTZ, ESQ. IN SUPPORT OF ORDER TO SHOW CAUSE**

Allen Schwartz, an attorney duly admitted to practice law before the Courts of this state, being duly deposed, affirms under penalty of perjury pursuant to CPLR 2106 as follows:

1. I am counsel to Jared Chassen in this action. I submit this affirmation in support of Chassen's Order to Show Cause.
2. This motion is filed on an emergent basis by Order to Show Cause because Jeffrey Simpson is defying the receiver orders entered by the Court almost two months ago, preventing the receiver from taking control. NYSCEF Nos. 1352, 1360. By those orders, this Court found by clear and convincing evidence that there was a danger that these assets would be materially injured or destroyed without a receiver. This motion seeks, among other things, to obtain Simpson's immediate compliance with the Court's orders by fining and incarcerating him until he complies.
3. Annexed hereto as Exhibit 1 is a true and correct copy of the March 25, 2025 Order of the United States District Court for the Southern District of New York.
4. Annexed hereto as Exhibit 2 is a true and correct copy of the Court's November 18, 2024 Order.
5. Annexed hereto as Exhibit 3 is a true and correct copy of the Court's March 8, 2025 Decision and Order (NYSCEF No. 1352).

6. Annexed hereto Exhibit 4 is a true and correct copy of the Court's March 11, 2025 Order Appointing Receiver (NYSCEF No. 1360).

7. Annexed hereto as Exhibit 5 is a true and correct copy of the Affirmation of Eric Huebscher with its exhibits.

8. All documents cited in the annexed memorandum of law or any other filings in this motion by citation to the NYSCEF docket in this action are fully incorporated herein and are part of the record of this motion. CPLR 2214(c) provides that “[i]n an e-filed action, a party that files papers in connection with a motion need not include copies of papers that were filed previously electronically with the court, but may make reference to them, giving the docket numbers on the e-filing system.”

9. There is a pending contempt motion for Simpson's prior defiance of this Court's Orders, (Mot. Seq. No. 13), but no prior request for this relief has otherwise been made to this or any other Court.

I affirm this 30th day of April, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

By: \_\_\_\_\_/s/  
Allen Schwartz

**WORD COUNT CERTIFICATION**

Allen Schwartz hereby certifies that the annexed document contains fewer than 7000 words exclusive of the table of contents, signature block and caption and that I relied on Microsoft Word to ascertain the word count. Movant has requested permission herewith to submit this affirmation above the 7000 word-limit.

By: /s/  
Allen Schwartz

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JEFFREY SIMPSON; ET AL.,

Plaintiffs,

-against-

JARED CHASSEN; ET AL.,

Defendants.

1:25-CV-2372 (LTS)

ORDER DIRECTING PAYMENT OF FEE  
OR IFP APPLICATION

LAURA TAYLOR SWAIN, Chief United States District Judge:

This action was submitted to the court by email and has been assigned the docket number listed above. To proceed with a civil action, a plaintiff must either pay the \$405.00 in fees or, to request authorization to proceed without prepayment of fees, submit a signed *in forma pauperis* (“IFP”) application. *See* 28 U.S.C. §§ 1914, 1915.<sup>1</sup>

Within thirty days of the date of this order, Plaintiff must either pay the \$405.00 in fees or, if Plaintiff is unable to pay such fees, Plaintiff should complete, sign, and submit the attached IFP application.<sup>2</sup> Payment of the fees should be mailed to the following address: United States District Court for the Southern District of New York, Cashiers-Room 260, 500 Pearl Street, New York, NY 10007. Payment of the fees by mail must (1) be made by money order or certified check; (2) be made payable to: Clerk, USDC, SDNY; and (3) include the docket number listed above. Personal checks are not accepted. Payment of the fees also can be made in person at the courthouse by credit card, money order, certified check, or cash.

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<sup>1</sup> The \$405.00 in fees includes a \$350.00 filing fee plus a \$55.00 administrative fee. (Please check the [fee schedule](#) on the website for any updates.) A defendant removing an action from state to federal court is responsible for the filing fees.)

<sup>2</sup> If more than one plaintiff has joined in this action, and if all of the plaintiffs seek to proceed IFP, each of the plaintiffs must complete, sign, and submit a separate IFP application.

No further action will be taken in this case, and no summons shall issue or answer be required, until the fees are paid or a completed and signed IFP application is received. If Plaintiff complies with this order, the case shall be processed in accordance with the procedures of the Clerk's Office. If the Court grants the IFP application, Plaintiff will be permitted to proceed without prepayment of fees. *See* 28 U.S.C. § 1915(a)(1). If Plaintiff submitted proper payment for this action before receiving this order, the case will proceed once that payment is processed.

If Plaintiff fails to comply with this order within the time allowed, or fails to seek an extension of time to comply, the action will be dismissed without prejudice to refiling.

The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from this order would not be taken in good faith, and therefore IFP status is denied for the purpose of an appeal. *Cf. Coppededge v. United States*, 369 U.S. 438, 444–45 (1962) (holding that appellant demonstrates good faith when seeking review of a nonfrivolous issue).

SO ORDERED.

Dated: March 25, 2025  
New York, New York

/s/ Laura Taylor Swain

---

LAURA TAYLOR SWAIN  
Chief United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

(full name of the plaintiff or petitioner applying (each person must submit a separate application))

CV

( ) ( )

-against-

(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number.)

(full name(s) of the defendant(s)/respondent(s))

**APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS**

I am a plaintiff/petitioner in this case and declare that I am unable to pay the costs of these proceedings and I believe that I am entitled to the relief requested in this action. In support of this application to proceed *in forma pauperis* (IFP) (without prepaying fees or costs), I declare that the responses below are true:

1. Are you incarcerated?  Yes  No (If "No," go to Question 2.)

I am being held at: \_\_\_\_\_

Do you receive any payment from this institution?  Yes  No

Monthly amount: \_\_\_\_\_

If I am a prisoner, see 28 U.S.C. § 1915(h), I have attached to this document a "Prisoner Authorization" directing the facility where I am incarcerated to deduct the filing fee from my account in installments and to send to the Court certified copies of my account statements for the past six months. See 28 U.S.C. § 1915(a)(2), (b). I understand that this means that I will be required to pay the full filing fee.

2. Are you presently employed?  Yes  No

If "yes," my employer's name and address are: \_\_\_\_\_

Gross monthly pay or wages: \_\_\_\_\_

If "no," what was your last date of employment? \_\_\_\_\_

Gross monthly wages at the time: \_\_\_\_\_

3. In addition to your income stated above (which you should not repeat here), have you or anyone else living at the same residence as you received more than \$200 in the past 12 months from any of the following sources? Check all that apply.

- (a) Business, profession, or other self-employment  Yes  No
- (b) Rent payments, interest, or dividends  Yes  No

- |   |                          |     |                          |    |
|---|--------------------------|-----|--------------------------|----|
| (c) Pension, annuity, or life insurance payments  | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (d) Disability or worker's compensation payments  | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (e) Gifts or inheritances   | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (f) Any other public benefits (unemployment, social security, food stamps, veteran's, etc.) | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (g) Any other sources   | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

If you answered "No" to all of the questions above, explain how you are paying your expenses:

4. How much money do you have in cash or in a checking, savings, or inmate account?
  
5. Do you own any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value, including any item of value held in someone else's name? If so, describe the property and its approximate value:
  
6. Do you have any housing, transportation, utilities, or loan payments, or other regular monthly expenses? If so, describe and provide the amount of the monthly expense:
  
7. List all people who are dependent on you for support, your relationship with each person, and how much you contribute to their support (only provide initials for minors under 18):
  
8. Do you have any debts or financial obligations not described above? If so, describe the amounts owed and to whom they are payable:

*Declaration:* I declare under penalty of perjury that the above information is true. I understand that a false statement may result in a dismissal of my claims.

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Dated

---

Signature

---

Name (Last, First, MI)

---

Prison Identification # (if incarcerated)

---

Address

---

City

---

State

---

Zip Code

---

Telephone Number

---

E-mail Address (if available)

**FILED: NEW YORK COUNTY CLERK 10/28/2024 08:25 PM**

RECEIVED NYSCEF: 10/28/2024

NYSCEF DOC. NO. 9454  
NYSCEF DOC. NO. 711

RECEIVED NYSCEF: 10/28/2024

At IAS Part 3 of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse located at 60 Centre Street, New York, New York on the 30th day of October 2024

PRESENT: Joel M. Cohen,  
J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

-----X  
JEFFREY SIMPSON, individually and derivatively,  
as managing member of JJ ARCH LLC,  
suing derivatively as managing member of  
ARCH REAL ESTATE HOLDINGS LLC,  
and JJ ARCH LLC,

*Plaintiffs,* Index No. 158055/2023

-against- Justice Joel M. Cohen  
*OSC MS#13*

JARED CHASSEN and FIRST REPUBLIC BANK,

*Defendants.*

-----X  
JARED CHASSEN, individually and derivatively  
on behalf of JJ ARCH LLC, as member,  
and derivatively on behalf of  
ARCH REAL ESTATE HOLDINGS LLC,  
as member of JJ ARCH,

*Counterclaim Plaintiff,*

-against-

JEFFREY SIMPSON and YJ SIMCO LLC,

*Counterclaim Defendants,*

-and-

JJ ARCH LLC and  
ARCH REAL ESTATE HOLDINGS LLC,

**FILED: NEW YORK COUNTY CLERK 10/28/2024 08:25 PM**

RECEIVED NYSCEF: 10/28/2024

NYSCEF DOC. NO. 711

RECEIVED NYSCEF: 10/28/2024

*Nominal Defendants.*

-----x  
608941 NJ, INC.

*Plaintiff,*

-against-

JEFFREY SIMPSON, JJ ARCH LLC and ARCH REAL  
ESTATE HOLDINGS LLC,

*Defendants,*

-and-

ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendant.*

-----x

**WARNING:  
YOUR FAILURE TO APPEAR IN COURT  
MAY RESULT IN YOUR IMMEDIATE ARREST  
AND IMPRISONMENT FOR CONTEMPT OF COURT.**

**NOTICE:**

**THE PURPOSE OF THE HEARING UPON THE FOLLOWING  
APPLICATION IS TO PUNISH THE ACCUSED FOR CONTEMPT OF  
COURT, AND THAT SUCH PUNISHMENT MAY CONSIST OF FINES OR  
IMPRISONMENT OR BOTH, ACCORDING TO LAW**

**EMERGENCY ORDER TO SHOW CAUSE**

Upon the annexed affirmation of Jared Chassen, together with its exhibits, the annexed affirmation of Allen Schwartz, together with its exhibits, the memorandum of law, and all documents cited to NYSCEF in the annexed papers, and all pleadings and proceedings had herein:

FILED: NEW YORK COUNTY CLERK 10/28/2024 08:25 PM

RECEIVED NYSCEF: 10/28/2024

NYSCEF DOC. NO. 711

RECEIVED NYSCEF: 10/28/2024

LET Jeffrey Simpson (“Simpson”) show cause before this Court, at Part 3, Room 208, at the Courthouse located at 60 Centre Street, New York, New York on **January 14, 2025**, at **11:00a.m.** or as soon thereafter as counsel can be heard, why an order should not be entered:

- (1) pursuant to CPLR 6314, based on compelling and changed circumstances immediately vacating or modifying those parts of the (i) the August 21, 2023 Order Regarding Interim Operating Procedures (NYSCEF 36) (the “August Interim Order”), and (ii) the September 29, 2023 Decision and Order (NYSCEF 159) (the “Simpson Preliminary Injunction”), that restored Simpson to managerial control of JJ Arch LLC (“JJ Arch”), and (iii) the November 22, 2023 Decision and Order (NYSCEF 419)(the “Chassen Preliminary Injunction”), and (iv) any other preliminary injunction or interim orders entered in this action that restored Simpson to membership or managerial control or precluded Chassen from terminating Simpson, or otherwise preclude the injunctive relief sought herein, and ordering such other modifications that will ensure that JJ Arch and Chassen are protected from Simpson during the pendency of this proceeding;
- (2) granting a preliminary injunction enforcing or authorizing Simpson’s forced resignation as a member of JJ Arch for committing numerous Cause Events as defined in the JJ Arch LLC Operating Agreement, and enjoining Simpson from acting as a member or managing member of JJ Arch during the pendency of this proceeding and ordering that Chassen shall act as managing member of JJ Arch in his stead;
- (3) enforcing this Court’s prior orders and ordering that Simpson immediately provide Chassen with (i) full viewing access of the bank accounts of JJ Arch and its Investment Entities (as defined in the JJ Arch LLC Operating Agreement), (ii) the books and records as requested by Chassen in his books and records demand, and (iii)a listing of all transactions at JJ Arch and any Investment Entities during the JJ Arch bankruptcy proceeding;
- (4) holding and adjudging Simpson in civil contempt of the following Court orders: (i) the August Interim Order, (ii) the September 15, 2023 Order to Show Cause (NYSCEF 86) (the “September TRO”) (NYSCEF 86), (iii) the Simpson Preliminary Injunction, (iv) the Chassen Preliminary Injunction, (v) the November 22, 2023 Amended Decision and Order (NYSCEF 418) (the “Oak Preliminary Injunction”), and (vi) the February 7, 2024 Temporary Restraining Order (NYSCEF 604) (the “February 2024 TRO”) (collectively, the “Orders”), ordering Simpson incarcerated and fined until he complies with the Orders, and setting an inquest to determine Chassen’s damages;
- (5) holding and adjudging Simpson in criminal contempt of the Orders and punishing him by fine and imprisonment for his injury to the power and dignity of the Court; and
- (6) granting such other and further relief as the Court deems just and proper.

FILED: NEW YORK COUNTY CLERK 10/28/2024 08:25 PM

RECEIVED NYSCEF: 10/28/2024

NYSCEF DOC. NO. 934  
NYSCEF DOC. NO. 711

RECEIVED NYSCEF: 10/28/2024

SUFFICIENT CAUSE THEREFORE BEING ALLEGED, IT IS:

~~IT IS ORDERED~~, that pending the hearing and adjudication of this motion, Simpson is hereby enjoined and restrained from acting as managing member of JJ Arch, and Chassen shall act as managing member of JJ Arch; and it is further

**ORDERED** that Simpson immediately provide, and continue to provide, Chassen with (1) complete access to the bank accounts of JJ Arch and its Investment Entities (as defined in the JJ Arch LLC Operating Agreement), (2) JJ Arch and its Investment Entities' books and records as previously requested by Chassen in his books and records demands, and (3) a complete listing of all transactions at JJ Arch and its Investment Entities during the pendency of the bankruptcy proceeding; and it is further

**ORDERED** that supplemental briefing in support, if any, shall be filed on NYSCEF and served on the parties by email **on or before November 26, 2024**; it is further

**ORDERED** that opposition to this motion, if any, shall be e-filed on NYSCEF and emailed to counsel **on or before December 17, 2024**; and it is further

**ORDERED** that reply, if any, shall be e-filed on NYSCEF and emailed to counsel on or before **January 10, 2025**.

LET service of this Order and annexed affidavits upon Jeffrey Simpson, or his counsel, via NYSCEF and email or personal service **on or before November 21, 2024**, be deemed good and sufficient service thereof.

**The Court declines to sign the proposed temporary relief that Chassen be placed in control of JJ Arch LLC for the reasons expressed in its Interim Decision and Order (NYSCEF 934).**

ENTER:

Date: 11/18/24

Hon. J. M. Cohen  
Joel M. Cohen, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
 COUNTY OF NEW YORK: COMMERCIAL DIVISION PART 03M

-----X

JEFFREY SIMPSON, INDIVIDUALLY AND  
 DERIVATIVELY, AS MANAGING MEMBER OF JJ ARCH  
 LLC, SUING DERIVATIVELY AS MANAGING MEMBER  
 OF ARCH REAL ESTATE HOLDINGS LLC, JJ ARCH LLC,

**INDEX NO.** 158055/2023

**MOTION DATE** 12/16/2024

Plaintiff,

**MOTION SEQ. NO.** 017

- v -

JARED CHASSEN, FIRST REPUBLIC BANK, YJ SIMCO  
 LLC, ARCH REAL ESTATE HOLDINGS LLC,

**DECISION + ORDER ON  
 MOTION**

Defendant.

-----X

HON. JOEL M. COHEN:

The following e-filed documents, listed by NYSCEF document number (Motion 017) 994, 995, 996, 997, 998, 999, 1000, 1002, 1007, 1008, 1009, 1010, 1013, 1016, 1017, 1018, 1033, 1034, 1035, 1036, 1037, 1041, 1042, 1045, 1064, 1067, 1076, 1078, 1080, 1081, 1082, 1087, 1088, 1089, 1090, 1091, 1095, 1099, 1100, 1104, 1108, 1113, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1131, 1132, 1133, 1134, 1140, 1147, 1148, 1149, 1150, 1155, 1156, 1157, 1162, 1163, 1165, 1166, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1291, 1292, 1295, 1296, 1315, 1318, 1319, 1320, 1346, 1347, 1348, 1349, 1350, 1351

were read on this motion to

**APPOINT RECEIVER**

Upon the foregoing documents, and for the reasons stated on the record following the evidentiary hearing conducted on February 25 and 28, 2025, and the oral argument on March 5, 2025, it is

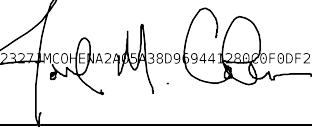
**ORDERED** that the motion to appoint a receiver is **granted**. Plaintiff shall have until Monday, March 10, 2025, to file his position regarding who should be appointed receiver. Defendant shall have until Wednesday, March 12, 2025, to prepare a response and a proposed order appointing the receiver; it is further

**ORDERED** that, until the Court enters an order appointing a receiver, Plaintiff Jeffrey Simpson is enjoined from transferring, encumbering, or otherwise disposing of or dissipating JJ Arch LLC assets (which shall include sales of real property), except for routine expenses in the ordinary course of business; it is further

**ORDERED** that the parties upload the transcripts of the evidentiary hearing and oral argument to NYSCEF upon receipt.

This constitutes the Decision and Order of the Court.

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JOEL M. COHEN, J.S.C.

3/8/2025

DATE

CHECK ONE:

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CASE DISPOSED

DENIED

X
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NON-FINAL DISPOSITION

OTHER

APPLICATION:

GRANTED

GRANTED IN PART

CHECK IF APPROPRIATE:

SETTLE ORDER

SUBMIT ORDER

INCLUDES TRANSFER/REASSIGN

FIDUCIARY APPOINTMENT

REFERENCE

SUPREME COURT OF THE STATE OF NEW YORK  
 COUNTY OF NEW YORK: COMMERCIAL DIVISION PART 03M

-----X

JEFFREY SIMPSON, INDIVIDUALLY AND  
 DERIVATIVELY, AS MANAGING MEMBER OF JJ ARCH  
 LLC, SUING DERIVATIVELY AS MANAGING MEMBER  
 OF ARCH REAL ESTATE HOLDINGS LLC, JJ ARCH LLC,

Plaintiff,

INDEX NO. 158055/2023

MOTION DATE 12/16/2024

MOTION SEQ. NO. 017

- v -

JARED CHASSEN, FIRST REPUBLIC BANK, YJ SIMCO  
 LLC, ARCH REAL ESTATE HOLDINGS LLC,

Defendant.

**ORDER APPOINTING  
 TEMPORARY RECEIVER**

-----X

HON. JOEL M. COHEN:

The following e-filed documents, listed by NYSCEF document number (Motion 017) 994, 995, 996, 997, 998, 999, 1000, 1002, 1007, 1008, 1009, 1010, 1013, 1016, 1017, 1018, 1033, 1034, 1035, 1036, 1037, 1041, 1042, 1045, 1064, 1067, 1076, 1078, 1080, 1081, 1082, 1087, 1088, 1089, 1090, 1091, 1095, 1099, 1100, 1104, 1108, 1113, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1131, 1132, 1133, 1134, 1140, 1147, 1148, 1149, 1150, 1155, 1156, 1157, 1162, 1163, 1165, 1166, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1291, 1292, 1295, 1296, 1315, 1318, 1319, 1320, 1346, 1347, 1348, 1349, 1350, 1351, 1358, 1359

were read on this motion for

Receiver

WHEREAS on December 16, 2024, Jared Chassen (“Chassen”) moved in this action for an order appointing a temporary receiver pursuant to CPLR 6401 and the Court’s equitable powers over certain assets and interests (defined below) belonging to JJ Arch LLC (“JJ Arch”) (Motion Seq. No. 17); and

WHEREAS the Court held a hearing on Motion Seq. No. 17 on February 25, 2025, February 28, 2025 and heard oral argument on March 4, 2025; and

WHEREAS on March 8, 2025, the Court issued a Decision and Order granting Motion Seq. No. 17 (NYSCEF No. 1352);

**SUFFICIENT CAUSE THEREFORE HAVING BEEN ESTABLISHED**, it is

**ORDERED**, that during the pendency of this litigation (subject to further order of the Court), Eric Huebscher, CPA, President of Huebscher & Co., having an address of 301 East 87<sup>th</sup> Street #20E, New York, New York 10128, be and hereby is appointed Receiver over: (1) JJ Arch's managerial and membership interests in the limited liability corporations known as 225 HPR LLC, 1640 Montauk LLC, 1640 Motors LLC, JJ NY 550 LLC, 146 E 89 Borrower 1 LLC, 146 E 89 Borrower 2 LLC, and 146 E 89 Borrower 3 LLC (the "JJ Arch Controlled Entities" or individually a "JJ Arch Controlled Entity"); (2) the real properties known as 225 Head of Pond Road, Water Mill, New York 11976, 550 Metropolitan Avenue, Brooklyn, New York 11211, 550 Montauk Highway, Southampton, New York 11968, and 146 E. 89<sup>th</sup> Street, New York, New York 10128, and the business known as Rêver Motors (the "JJ Arch Controlled Properties" or individually a "JJ Arch Controlled Property"); and (3) JJ Arch's bank accounts, records, and funds, the JJ Arch Controlled Entities' funds, assets, properties, records, and bank accounts, upon the Receiver executing and acknowledging in the usual form, and filing with the Clerk of this Court, a bond to the People of the State of New York in the penal sum of \$50,000.00, with a duly authorized surety company as surety, or with at least two sufficient individual sureties who shall severally justify, conditioned for the faithful discharge of his or her duties and for all moneys or property of every kind received by him or her as such receiver, which bond is to be approved as to its sufficiency, form, and manner of execution and sufficiency of surety by a Justice of this Court; and it is further

**ORDERED**, that upon the filing of said bond so approved, the Receiver shall have complete and sole managerial authority over (1) the bank accounts, funds and records over which JJ Arch exercises control (the “Accounts”), including those belonging to the JJ Arch Controlled Entities, (2) the JJ Arch Controlled Entities in their entirety, and (3) the JJ Arch Controlled Properties in their entirety; and it is further

**ORDERED** that upon the filing of said bond so approved, the Receiver shall promptly evaluate any current offers to purchase any JJ Arch Controlled Property, and the underlying sales process that has been undertaken by JJ Arch or Jeffrey Simpson (“Simpson”) to determine its adequacy, and shall decide whether to accept and thereafter effectuate the purchase offer or offers, or reject any such offer or offers; and it is further

**ORDERED** that upon the filing of said bond so approved, the Receiver shall be authorized to: (i) manage, rent, lease, sell or develop the JJ Arch Controlled Properties, and take any other steps reasonably necessary to maximize the remaining equity belonging to the JJ Arch Controlled Entities, (ii) refinance or renegotiate any of the JJ Arch Controlled Entities mortgages or loans, (iii) undertake an accounting of JJ Arch and the JJ Arch Controlled Entities and the JJ Arch Controlled Properties; (iv) prepare and file tax returns for JJ Arch and the JJ Arch Controlled Entities and the JJ Arch Controlled Properties; (v) appear in, defend or settle any foreclosure proceeding relating to the JJ Arch Controlled Entities and the JJ Arch Controlled Properties; (vi) file and prosecute Chapter 7 bankruptcy liquidation proceedings for any JJ Arch Controlled Entity or any JJ Arch Controlled Property as the Receiver deems necessary to maximize the value of any JJ Arch Controlled Entity or the remaining total equity of JJ Arch as a whole; and (vii) take such other actions or dispositions of these assets as the Receiver deems

necessary to maximize the value of the JJ Arch Controlled Entities and JJ Arch Controlled Properties and to prevent waste and loss of value; and it is further

**ORDERED** that upon the filing of said bond so approved, the Receiver shall have the power and authority to do all things appropriate and necessary to carry out his obligations and authority as set forth in this Order, including without limitation commencing any legal action that may be necessary to collect, receive, protect or preserve the Accounts, the JJ Arch Controlled Entities or the JJ Arch Controlled Properties; and it is further

**ORDERED** that the appointee named herein shall comply with Section 35a of the Judiciary Law, Sections 6401-6404 of the C.P.L.R., Section 1325 of the R.P.A.P.L. and Rule 36 of the Chief Judge; and it is further

**ORDERED** that the Receiver shall not appoint an attorney, agent, appraiser, auctioneer, or accountant without prior approval of this Court, which approval may be obtained by letter application to the Court; and it is further

**ORDERED** that at least five (5) days prior to entering into any proposed contract of sale of any JJ Arch Controlled Property, or filing a Chapter 7 liquidation proceeding for any JJ Arch Controlled Entity, the Receiver shall send a letter to the Court informing the Court and the parties of the terms and details of the proposed sale or filing; and it is further

**ORDERED** that the Receiver may use the proceeds of any sale of any JJ Arch Controlled Property or any other funds collected or obtained by the Receiver to pay off the outstanding mortgage debt of another JJ Arch Controlled Property or JJ Arch Controlled Entity, prepare and file tax returns, obtain reasonably necessary insurance for another JJ Arch Controlled Property, defend or otherwise address foreclosure proceedings, and use such funds to

maximize the overall equity of JJ Arch in or from the JJ Arch Controlled Entities and JJ Arch Controlled Properties, and otherwise hold any sums remaining; and it is further

**ORDERED** that JJ Arch and Simpson (and Chassen, to the extent he possesses any of the following articles), shall immediately provide the Receiver with (1) all books and records and books of account of JJ Arch and the JJ Arch Controlled Entities, (2) an inventory of all assets belonging to the JJ Arch Controlled Entities, including a list of vehicles at, or that were at, Rever Motors, since August 16, 2023 whether titled in Simpson's name, the name of any entity controlled by Simpson, or the name of a JJ Arch Controlled Entity; (3) a list of all employees at the JJ Arch Controlled Entities or JJ Arch Controlled Properties since August 16, 2023, any payroll records for such employees, and any evidence that payroll taxes were paid for such employee(s); (4) copies of all filed tax returns for JJ Arch and the JJ Arch Controlled Entities to the extent such exist, and all tax correspondence from or to the Internal Revenue Service or any other governmental entity; (5) all banking records for JJ Arch and the JJ Arch Controlled Entities; (6) all books, logs, spreadsheets, and other documents detailing the transactions at the JJ Arch Controlled Entities and funds and assets belonging to the JJ Arch Controlled Entities; (7) keys to, or any other items, codes, or similar required to access, JJ Arch Properties, and (8) any other documents requested by the Receiver and necessary or helpful for the Receiver to fulfil his or her duties under this Order. For the avoidance of doubt, the obligations of this paragraph are required of both Simpson and Chassen (to the extent Chassen possesses the records and items), and the fact that one or the other of Simpson and Chassen can produce these records and items does not obviate the obligation of the other to produce the same upon request by the Receiver; and it is further

**ORDERED** that neither Simpson nor Chassen shall communicate with the Receiver except through counsel unless otherwise requested by the Receiver in writing, but in the event one or both does not have counsel, unless otherwise requested by the Receiver in writing, the pro se party may communicate via email only during business hours, copying the other party and any counsel on all such email correspondence, and shall cease doing so if the Receiver makes a written request to the pro se party that the pro se party cease such communications; and it is further

**ORDERED** that where Simpson and Chassen can agree on a course of action, such as a sale or other disposition of an asset, and do so in writing to the Receiver, the Receiver may take that course of action, unless in the Receiver's judgment that course of action is unreasonable or inadvisable; and it is further

**ORDERED** that the Receiver does not need to seek or obtain the consent of Simpson or Chassen to effectuate any of his or her duties or authorizations under this Order; and it is further

**ORDERED** that neither Simpson nor Chassen may interfere with the Receiver in exercising his or her duties; and it is further

**ORDERED** that the Receiver may, at his or her discretion, and provided there are sufficient funds, employ Simpson or Chassen, or both, to work at Rêver Motors in a non-managerial role provided that neither Simpson nor Chassen shall have anything other than viewing access to the accounts, funds, or records of Rêver Motors, and such employment will be under the supervision of the Receiver or a manager acting on behalf of the Receiver; and it is further,

**ORDERED** that in the event the Receiver chooses to employ Simpson or Chassen or both at Rêver Motors, and either wishes to take such employment, such employment shall be at

will and each shall be compensated at an hourly rate not to exceed \$25 per hour, unless the Receiver requests a higher rate of pay and such request is approved by the Court; and it is further

**ORDERED** that during the period until the Receiver posts the undertaking as required herein, Simpson shall remain enjoined from transferring, encumbering, or otherwise disposing of or dissipating JJ Arch assets (which shall include sales of real property), except for routine expenses in the ordinary course of business; and it is further

**ORDERED** that nothing herein abrogates or modifies the prior orders of this Court governing JJ Arch's interests in Arch Real Estate Holdings, LLC ("AREH"), including but not limited to the order entered at NYSCEF No. 418. For the avoidance of doubt, the Receiver shall not control JJ Arch's membership interests or consent rights in AREH, which shall remain governed by the Court's prior orders, including NYSCEF No. 418; and it is further

**ORDERED** except as modified herein or superseded by the appointment of a Receiver as provided herein, the Court's prior orders at NYSCEF No. 36, 86, 159 and 419, and the rights provided therein, remain in full force and effect unless and until the Court determines otherwise. Simpson and Chassen shall remain members of JJ Arch, unless and until the Court determines otherwise. No Company Major Decision (NYSCEF No. 36, 86, 159, 419) may be undertaken by Simpson without Chassen's prior written consent unless and until the Court determines otherwise. For the avoidance of any doubt, neither Simpson nor Chassen shall unilaterally file any bankruptcy for JJ Arch without the other's consent; it is further

**ORDERED** that upon notice to the parties, the Receiver may seek interim commission(s) and approval of Receiver's expenses (including the fees and expenses of professionals retained by Receiver in accordance with this order) on a periodic basis. Receiver is authorized to pay approved interim commissions, expenses and fees out of any funds collected by, or assets

liquidated by, Receiver pursuant to this Order. Such fees paid by the Receiver to other professionals retained by Receiver shall not be payable out of, or deemed part of, Receiver's commissions; it is further

**ORDERED** that JJ Arch is solely responsible for any and all expenses, costs and/or fees incurred by Receiver, including fees and expenses of other professionals retained by Receiver, in connection with his receivership and performance of his duties pursuant to this Order; and it is further

**ORDERED** that the Receiver shall be compensated in accordance with relevant governing law, subject to Court approval.

IT IS SO ORDERED.



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JOEL M. COHEN, J.S.C.

3/11/2025  
DATE

CHECK ONE:

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CASE DISPOSED

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GRANTED

DENIED

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NON-FINAL DISPOSITION

OTHER

GRANTED IN PART

REFERENCE

SUBMIT ORDER

FIDUCIARY APPOINTMENT

APPLICATION:  
CHECK IF APPROPRIATE:

INCLUDES TRANSFER/REASSIGN

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION PART 03M  
-----X

JEFFREY SIMPSON, INDIVIDUALLY AND  
DERIVATIVELY, AS MANAGING MEMBER OF JJ  
ARCH LLC, SUING DERIVATIVELY AS MANAGING  
MEMBER OF ARCH REAL ESTATE HOLDINGS LLC,  
JJ ARCH LLC,

Index No. 158055/2023

Mot. Seq. 23

Hon. Joel M. Cohen

Plaintiff,

-v-

JARED CHASSEN, FIRST REPUBLIC BANK, YJ  
SIMCO LLC, ARCH REAL ESTATE HOLDINGS LLC,

Defendants.

-----X

**AFFIRMATION OF ERIC M. HUEBSCHER, IN HIS CAPACITY AS RECEIVER, IN  
SUPPORT OF RECEIVER'S MOTION FOR AN ORDER COMPELLING JEFFREY  
SIMPSON TO COMPLY WITH RECEIVERSHIP ORDER AND DIRECTING  
SHERIFF TO ENFORCE RECEIVERSHIP ORDER**

I, Eric M. Huebscher, not individually but solely in my capacity as court appointed receiver (the “Receiver”), affirm the following under penalty of perjury pursuant to [CPLR §2106](#):

1. I submit this affirmation in support of my motion, brought by order to show cause, seeking an order (i) compelling plaintiff Jeffrey Simpson (“Simpson”) to comply with this Court’s Order Appointing Temporary Receiver, dated March 11, 2025 ([NYSCEF Doc. No. 1360](#)) (the “Receivership Order”),<sup>1</sup> to address Simpson’s willful and continuous refusal to comply with its terms; (ii) directing the Civil Enforcement Bureau of the Suffolk County Sheriff’s Office and the Sheriff of any other county in which a JJ Arch Controlled Property is located to enforce the Receivership Order; and (iii) granting such other and further relief this Court deems just and proper (the “Motion”).

---

<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Receivership Order.

**Basis for Expedited Consideration**

2. By the Receivership Order, I was appointed Receiver over: (1) JJ Arch's managerial and membership interests in the JJ Arch Controlled Entities, including 225 HPR LLC, 1640 Montauk LLC and 1640 Motors LLC; (2) the JJ Arch Controlled Properties, including 225 Head of Pond Road, Water Mill, New York ("225 Head of Pond Road"), 1640 Montauk Highway, Southampton, New York ("1640 Montauk Highway"), and the business known as Rêver Motors; and (3) JJ Arch's bank accounts, records, and funds, and the JJ Arch Controlled Entities' funds, assets, properties, records, and bank accounts. A true and correct copy of the Receivership Order is annexed hereto as **Exhibit A**.

3. On March 18, 2025, I filed my Oath ([NYSCEF Doc. No. 1366](#)) and Bond ([NYSCEF Doc. No. 1367](#)).<sup>2</sup>

4. The Receivership Order provides that:

upon the filing of said bond so approved, the Receiver shall have complete and sole managerial authority over (1) the bank accounts, funds and records over which JJ Arch exercises control. . . , including those belonging to the JJ Arch Controlled Entities, (2) the JJ Arch Controlled Entities in their entirety, and (3) the JJ Arch Controlled Properties in their entirety...

Exhibit A, p. 3.

5. Among the JJ Arch Controlled Entities over which I was appointed Receiver is 1640 Motors LLC, which operates "the business known as Rêver Motors" at 1640 Montauk Highway, one of the JJ Arch Controlled Properties over which I was appointed Receiver. *See Exhibit A, p. 2.*

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<sup>2</sup> The Bond was approved by this Court on March 21, 2025 ([NYSCEF Doc. No. 1401](#)).

6. Simpson removed this action to the United States District Court for the Southern District of New York on or about March 24, 2025. The action was assigned to Chief Judge Laura Taylor Swain. Judge Swain remanded the action to this Court by order entered April 25, 2025.

7. As demonstrated in this declaration, Simpson has willfully and continuously violated virtually every term of the Receivership Order. To date, he has (i) prevented me from entering onto the 1640 Montauk Highway property and exercising control and authority over the Rêver Motors business, (ii) prevented me from marketing the 225 Head of Pond Road, Water Mill property, which is improved by an unoccupied residential home, and (iii) willfully failed and refused to provide me with any of the books, records, keys and other things related to the JJ Arch Controlled Entities and the JJ Arch Controlled Properties, including Rêver Motors, despite written requests to him.

8. As detailed below, the Southampton Town Police Department and the New York State Police advised me that only the Suffolk County Sheriff's Office and its Civil Enforcement Bureau could put me in possession of 1640 Montauk Highway, the Rêver Motors business and 225 Head of Pond Road. After I sent the Receivership Order and my bond to the Civil Enforcement Bureau, they responded that they had reviewed the documents I sent them. However, stated the Civil Enforcement Bureau, (i) “[n]one of your documents direct the Suffolk County Sheriff's Office to enforce anything” and (ii) I need to go to court and get a “Warrant to Remove [that] specifically directs the Suffolk County Sheriff to enforce an eviction.” Further, said the Civil Enforcement Bureau, “we would not turn over a business to you and none of your documents state anything like that.”

9. As a result, this Motion seeks the expedited issuance of an order by this Court:

- Placing the Receiver in possession of 1640 Montauk Highway, the Rêver Motors business premises there located, and the 225 Head of Pond Road property;
- Removing Simpson from the 1640 Montauk Highway and 225 Head of Pond Road properties if he is present there;
- Preventing Simpson's entry onto the 1640 Montauk Highway and 225 Head of Pond Road properties;
- Providing the Receiver full access to all of the personal property, including the books, records and vehicle certificates of title, of the Rêver Motors business located at the 1640 Montauk Highway property or elsewhere;
- Reiterating Simpson's duty to provide the Receiver with all of the books, records, information and other items set forth in the Receivership Order, including bank accounts, funds, an inventory of all assets belonging to the JJ Arch Controlled Entities, including a list of vehicles at Rêver Motors beginning on August 16, 2023, and a list of all of the employees of Rêver Motors; and
- Providing the Receiver with any other documents requested by the Receiver and necessary or helpful to the Receiver in fulfilling his duties.

**Simpson's refusal to permit entry onto 1640 Montauk Highway and cede control over the Rêver Motors business**

10. Simpson has prevented me from taking control of the 1640 Montauk Highway property, 1640 Motors LLC and the Rêver Motors business.

11. Specifically, on March 24, 2025, I planned a site visit to Rêver Motors, located at 1640 Montauk Highway. I arrived at approximately 11:00 a.m. and was greeted by a young man standing in the office showroom. I informed him that, pursuant to the Receivership Order, this Court appointed me Receiver with complete and sole managerial authority of Rêver Motors. I then

asked him if Simpson was on the premises. The young man left the area for a moment, and when he came back he informed me that Simpson was not available. I showed him the Receivership Order and the Bond.

12. I asked the young man where the certificates of title for the vehicles at the premises were kept. He told me some were stored in a drawer behind the counter, and others were held by a finance company. I went behind the counter and started to look at titles in the drawer. My initial reaction was that there were many fewer titles in the drawer than there were cars on the premises.

13. Approximately three or four minutes later Simpson appeared and started yelling at me, calling me names. He demanded that I immediately leave the premises. He persisted with name calling and was screaming very loudly. He then called the police and then the FBI (as he claimed). As his verbal assaults and demeanor became more and more aggressive, I called the police.

14. When I connected with the 911 operator I asked for immediate police presence. I put the phone on speaker so that the operator could hear Simpson. The 911 operator advised that she was recording the conversation. With the 911 operator on the line, Simpson continued to yell and call me names with vulgar undertones. The 911 operator asked if Simpson was armed, and my response was that I did not know. Simpson stayed about 25 feet from me at all times during this event.

15. Two Southampton police officers arrived on the scene, one of them male and the other female. When the male officer approached I handed him a copy of the Receivership Order and informed him why I was on the premises. We spoke for about 4 to 5 minutes. The officers then switched. The female officer approached me and I explained my presence and showed her the Receivership Order.

16. I agreed with the female officer to leave the premises. The female officer walked me to my vehicle. Thereafter the male officer approached and asked whether I had removed any documents from the office and I informed them both that I had not. A true and correct copy of the Southampton Town Police Department Incident Report (the “Police Report”) is annexed hereto as **Exhibit B.**

17. The Police Report states that, after the Receiver identified himself to the police as the receiver of the property and that he was at the property to collect files from the business, “[t]he complainant [Simpson] state[d] that the court order [appointing me receiver] was dismissed and the [Receiver] does not have rights to the property anymore. . . .” The police, not wanting to be placed in the position of reviewing and interpreting a court order, asked me to leave the property “and go forward with the issue in civil court.” I accordingly left the property.

18. On April 22, 2025, following further communication with the Southampton Town Police Department (the “Southampton Police”), and the review by the Southampton Police of the Receivership Order, I again attempted to enter Rêver Motors with Southampton Police officers. Due to Simpson’s threatening behavior toward me on March 24, I engaged an armed guard who accompanied me. The Southampton Police, however, again did not permit me access, advising me that I should contact the Civil Enforcement Bureau of the Suffolk County Sheriff’s Office.

19. I promptly contacted the Suffolk County Sheriff’s Office the same day, e-mailed it the Receivership Order and my bond, and spoke with the Civil Enforcement Bureau of that Office. The Principal Office Assistant of the Civil Enforcement Bureau responded to my e-mail. The Civil Enforcement Bureau stated that (i) they reviewed the documents I sent them, (ii) “[n]one of your documents direct the Suffolk County Sheriff’s Office to enforce anything”, and (iii) I needed to go to court and get a “Warrant to Remove [that] specifically directs the Suffolk County Sheriff to

enforce an eviction.” Further, said the Civil Enforcement Bureau, “we would not turn over a business to you and none of your documents state anything like that.” A true and correct copy of my April 22, 2025 e-mail to the Suffolk County Sheriff’s Office and their response of the same day are annexed hereto as **Exhibit C**.

20. Early that evening, Simpson called me directly on my cell phone and told me he knew I was at “his properties” today with the police, that “I am not permitted on his properties” and that his properties are “under federal jurisdiction.” Simpson repeated that his properties were under federal jurisdiction two or three times and then asked, “Do you understand me?” I told Simpson not to call me again. He then told me “he was going to have me arrested” and that he was “calling the police and FBI now.”

21. That same evening, on April 22, Simpson sent an e-mail to the *Pro Se* Part, S.D.N.Y., with a copy to, among others, me and this Court, stating:

So still after all the back-and-forth this Eric Huebscher guy still thinks he could go to my properties and attack. He is tampering with mail, locks etc.. it has come to my attention that he arrived at a property of mine this morning trying to cause issues and the police somehow arrived and told him to leave.

I literally left my property this morning to go to visit the SDNY to check the jurisdictional issues that are happening here for me to find out that this man has the nerve to trespass after he's been told to stand down.

I just called him on the phone and warned him one more time he is not to step foot on one of my properties without consent which he is not granted any. His answer on the phone was don't call me again. This man belongs nowhere near JJ Arch or Jeffrey Simpson. I will ask the police to press charges at this point for harassment.

When does the harassment end? Thank you New York State for causing a disaster around everything tied to my name without merit, without due process, without legitimacy. What a shame that the system is so broken.

A true copy of Simpson’s April 22, 2025 e-mail is annexed hereto as **Exhibit D**.

22. A short time later that evening, Simpson sent a text message to my cell phone number threatening me. This is the text message:

**Just in case you did not receive my email, this is Jeffrey Simpson here and I've already called the Southampton police and I'm going to be pressing charges on you for trespassing.  
You are not the step foot on one of my properties ever again.**

**You are nothing but it's [stet.] disgusting human that's a money hungry pig that should never have gone anywhere near me for any reason because you're nothing but a crook. If we see your car within 50 feet of my property we will have the police arrest you.**

And yes we have everything on camera so **don't you dare try to do something** in middle of the night the police have been notified already. It is shameful that you called yourself some of the court [stet.] because you're the farthest thing from it, **you're the biggest crook I've ever met.**

**You don't want me to contact you again great don't go near my properties don't go near anything belonging to me or my businesses.** If I found out you've touched another property besides 1640 that will be another call to the police.

(emphasis added).

23. I contacted the New York State Police the next day, April 23, but was similarly instructed to contact the Suffolk County Sheriff's Office.

24. Under these circumstances, this Motion seeks an order of this Court specifically directing the Civil Enforcement Bureau of the Suffolk County Sheriff's Office to (i) put the Receiver in possession of 1640 Montauk Highway and the Rêver Motors business, (ii) remove Simpson from the 1640 Montauk Highway property if he is present there, (iii) prohibit Simpson's entry onto the 1640 Montauk Highway property, and (iv) provide the Receiver full access to all of the personal property, including the books, records and vehicle certificates of title, of the Rêver Motors business.

**Simpson is impeding the marketing and sale  
by the Receiver of 225 Head of Pond Road**

25. Promptly upon my appointment, I visited the property located at 225 Head of Pond Road and changed the front door lock. The Receivership Order grants me “complete and sole managerial authority” over this property. The property is improved by an unoccupied residential home. After inspecting the property and the home, I determined that it should be sold and engaged a real estate broker to market it, subject to the broker’s approval by this Court.<sup>3</sup>

26. After my visit, I received an e-mail from Simpson on April 12 stating:

I just got an alarming phone call from the broker (compass) for 225 head of pond, an RE asset of JJ Arch LLC, which I am the sole managing member (and member) of. It appears that you are circumventing the brokers contractual agreement and fraudulently hiring other parties without authority or jurisdiction.

\*\*\*

Once again, I urge you to stand down until such point in time where the federal court has a chance to properly hear the action and render a decision. If you choose not to, I will have to make further inquiries to law-enforcement agencies.

A true and correct copy of the April 12 e-mail from Simpson to me is annexed as **Exhibit E**.

27. Some time after my visit, Simpson entered the property and either changed or damaged the front door lock.

28. On April 14, 2025, Simpson sent another e-mail:

...These folks don't stop their harassment. Per my note over the weekend, we need Court intervention. I literally left my family in the middle of Passover because of the anxiety of this malfeasance that continues. And yet again I find another incident where this individual Eric Huebscher seems to think he's above the law and he could just trespass and cause issues at my properties. He was not installed with good merit or with any authority on the person that made the action because that individual, Jared Chassen, committed perjury to the federal and state court in order to achieve his goals.

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<sup>3</sup> On April 25, 2025, I filed a Letter Application for an order approving the retention of, among others, a real estate broker for the 225 Head of Pond Road property (see [NYSCEF Doc. Nos. 1425 – 1431](#)).

I am pleading with the court to help me stop this nonsense now. No one should live this way with people attacking everything they've ever built and State Court that is either clueless or intentionally looking the other way to the bad acts that are occurring for almost 2 years now.

I did a visit with the FBI (white collar crime unit) this morning to give them further briefing of the destruction that's happening surrounding this case, I cannot say if they will or will not further investigate the illegal and improper actions that are recurring from the other parties here. I have been pleading to the southern district since December 2024 that the matters are urgent and the attacks are against my civil rights and my constitutional rights. I plead with the court to stop this madness and allow for a chance to explore and investigate exactly what has happened here properly with due process, with witnesses, with evidence with an unbiased court. The damages to me and others escalate by the day while these folks continue to break the law without any enforcement whatsoever. Given that this situation is in Southampton I am now waiting for the Southampton police to arrive to hopefully take a report on this for the record.

I am still investigating the mail fraud issue from last week and I have not heard back from the post office yet.

A true and correct copy of the April 14 e-mail from Simpson is annexed as **Exhibit F**.

29. On April 22, 2025, I returned to 225 Head of Pond Road with my armed guard, changed the lock again and installed an alarm system that notifies the Southampton Police when activated.

30. The alarm was activated by Simpson's presence at the house shortly thereafter. The Southampton Police responded but did not require Simpson to leave or prevent him from changing the lock again due to the lack of a court order specifically directing them to take action against Simpson for interfering with my receivership and my control over this property.

31. Consequently, this Motion seeks an order to (i) put the Receiver in possession of 225 Head of Pond Road, (ii) remove Simpson from the 225 Head of Pond Road property if he is present there, (iii) prohibit Simpson's entry onto the 225 Head of Pond Road property, and (iv) prohibit Simpson from interfering with the marketing and sale of this property by the Receiver.

**Simpson's refusal to provide the Receiver with Books and Records**

32. To fulfill my duties as Receiver of the JJ Arch Controlled Entities and the JJ Arch Controlled Properties I require the books and records of the receivership estate. In this regard, the Receivership Order required Simpson to "immediately provide" to me the following books, records and things (collectively, the "Books and Records"):

(a) all books and records and books of account of JJ Arch and the JJ Arch Controlled Entities, (2) an inventory of all assets belonging to the JJ Arch Controlled Entities, including a list of vehicles at, or that were at, Rêver Motors, since August 16, 2023 whether titled in Simpson's name, the name of any entity controlled by Simpson, or the name of a JJ Arch Controlled Entity; (3) a list of all employees at the JJ Arch Controlled Entities or JJ Arch Controlled Properties since August 16, 2023, any payroll records for such employees, and any evidence that payroll taxes were paid for such employee(s); (4) copies of all filed tax returns for JJ Arch and the JJ Arch Controlled Entities to the extent such exist, and all tax correspondence from or to the Internal Revenue Service or any other governmental entity; (5) all banking records for JJ Arch and the JJ Arch Controlled Entities; (6) all books, logs, spreadsheets, and other documents detailing the transactions at the JJ Arch Controlled Entities and funds and assets belonging to the JJ Arch Controlled Entities; (7) keys to, or any other items, codes, or similar required to access, JJ Arch Properties, and (8) any other documents requested by the Receiver and necessary or helpful for the Receiver to fulfil his or her duties under this Order.

Exhibit A, p. 5.

33. Notwithstanding the Receivership Order's directive to Simpson to "immediately provide the Receiver" with the Books and Records, Simpson failed to comply. On March 26, 2025, my proposed counsel sent a letter to Simpson's counsel, among others, demanding compliance with the Receivership Order by turning over the Books and Records by April 2, 2025. Neither Simpson nor his counsel provided any of the Books and Records in response to the letter. A true and correct copy of the March 26, 2025 letter is annexed hereto as **Exhibit G**.

34. On April 8, 2025, my proposed counsel, by e-mail to Simpson and his counsel, repeated and reiterated his March 26 requests to Simpson. In a responsive e-mail sent on April 8,

2025, which failed to provide any of the requested Books and Records, Simpson stated: "All has been said to the federal court so you will stand down and do nothing until the federal court speaks to the contrary." A true and correct copy of Simpson's April 8, 2025 e-mail is annexed hereto as

**Exhibit H.**

**Simpson directed the mortgage lender on 550 Metropolitan Ave, Brooklyn, NY not to provide the Receiver with information about its loan**

35. On March 29, 2025, Simpson interfered with my work by directing the mortgage lender on one of the JJ Arch Controlled Properties, a commercial condo unit located at 550 Metropolitan Avenue, Brooklyn, New York, not to provide me with information about the loan. Simpson claimed that I had no authority because he had removed the case to federal court. A true and correct copy of the e-mail of March 28, 2025 from Simpson to the lender is annexed as **Exhibit I**. After the lender's counsel was contacted by my proposed counsel, the lender provided the requested information.

36. No prior application seeking the relief requested in this Motion has been made to this or any other court.

37. I respectfully request that the Court expedite consideration of the Motion and enter an order (i) directing that Simpson (a) shall comply with the Receivership Order in all respects; (b) shall not, directly or indirectly (A) enter onto any of the JJ Arch Controlled Properties, including but not limited to 1640 Montauk Highway and 225 Head of Pond Road; (B) transact any business of Rêver Motors or any of the other JJ Arch Controlled Entities and/or JJ Arch Controlled Properties; and (C) do any act or refrain from any act whatsoever to interfere with the Receiver's taking custody, control, possession, or managing of the assets or documents subject to the Receivership; or to harass or to interfere with the Receiver in any way; or to communicate with the Receiver in any manner in violation of the Receivership Order; or to refuse to cooperate with

the Receiver or the Receiver's duly authorized agents in the exercise of their duties or authority under any Order of this Court; (ii) authorizing and directing the Civil Enforcement Bureau of the Suffolk County Sheriff's Office to: (a) place the Receiver in possession of the real property located at 1640 Montauk Highway; (b) place the Receiver in possession of the business premises of Rêver Motors located at 1640 Montauk Highway; (c) remove Simpson from 1640 Montauk Highway and the business premises of Rêver Motors; (d) prevent Simpson's entry onto 1640 Montauk Highway and the business premises of Rêver Motors; (e) place the Receiver in possession of the real property and the house located at 225 Head of Pond Road; (f) remove Simpson from 225 Head of Pond Road; and (g) prevent Simpson's entry onto 225 Head of Pond Road; (iii) authorizing and directing the Sheriff of any other county in which a JJ Arch Controlled Property is located, upon the request of the Receiver, to: (a) place the Receiver in possession of the JJ Arch Controlled Property; (b) remove Simpson from the JJ Arch Controlled Property; and (c) prevent Simpson's entry onto the JJ Arch Controlled Property; (iv) compelling Simpson to immediately turn over the Books and Records to the Receiver; and (v) granting such other and further relief this Court deems just and proper.

I affirm this 29<sup>th</sup> day of April, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

/s/ Eric M. Huebscher

Eric M. Huebscher

**CERTIFICATION OF COUNSEL**

This Affirmation was prepared by computer using Microsoft Word. The total number of words in the document, excluding the caption and the signature block, is 4,136. This certification complies with Rule 17 of the Commercial Division Rules.

/s/ *Martin G. Bunin*  
Martin G. Bunin

## **Exhibit A**

SUPREME COURT OF THE STATE OF NEW YORK  
 COUNTY OF NEW YORK: COMMERCIAL DIVISION PART 03M

-----X

JEFFREY SIMPSON, INDIVIDUALLY AND  
 DERIVATIVELY, AS MANAGING MEMBER OF JJ ARCH  
 LLC, SUING DERIVATIVELY AS MANAGING MEMBER  
 OF ARCH REAL ESTATE HOLDINGS LLC, JJ ARCH LLC,

Plaintiff,

INDEX NO. 158055/2023

MOTION DATE 12/16/2024

MOTION SEQ. NO. 017

- v -

JARED CHASSEN, FIRST REPUBLIC BANK, YJ SIMCO  
 LLC, ARCH REAL ESTATE HOLDINGS LLC,

Defendant.

**ORDER APPOINTING  
 TEMPORARY RECEIVER**

-----X

HON. JOEL M. COHEN:

The following e-filed documents, listed by NYSCEF document number (Motion 017) 994, 995, 996, 997, 998, 999, 1000, 1002, 1007, 1008, 1009, 1010, 1013, 1016, 1017, 1018, 1033, 1034, 1035, 1036, 1037, 1041, 1042, 1045, 1064, 1067, 1076, 1078, 1080, 1081, 1082, 1087, 1088, 1089, 1090, 1091, 1095, 1099, 1100, 1104, 1108, 1113, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1131, 1132, 1133, 1134, 1140, 1147, 1148, 1149, 1150, 1155, 1156, 1157, 1162, 1163, 1165, 1166, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1291, 1292, 1295, 1296, 1315, 1318, 1319, 1320, 1346, 1347, 1348, 1349, 1350, 1351, 1358, 1359

were read on this motion for

Receiver

WHEREAS on December 16, 2024, Jared Chassen (“Chassen”) moved in this action for an order appointing a temporary receiver pursuant to CPLR 6401 and the Court’s equitable powers over certain assets and interests (defined below) belonging to JJ Arch LLC (“JJ Arch”) (Motion Seq. No. 17); and

WHEREAS the Court held a hearing on Motion Seq. No. 17 on February 25, 2025, February 28, 2025 and heard oral argument on March 4, 2025; and

WHEREAS on March 8, 2025, the Court issued a Decision and Order granting Motion Seq. No. 17 (NYSCEF No. 1352);

**SUFFICIENT CAUSE THEREFORE HAVING BEEN ESTABLISHED**, it is

**ORDERED**, that during the pendency of this litigation (subject to further order of the Court), Eric Huebscher, CPA, President of Huebscher & Co., having an address of 301 East 87<sup>th</sup> Street #20E, New York, New York 10128, be and hereby is appointed Receiver over: (1) JJ Arch's managerial and membership interests in the limited liability corporations known as 225 HPR LLC, 1640 Montauk LLC, 1640 Motors LLC, JJ NY 550 LLC, 146 E 89 Borrower 1 LLC, 146 E 89 Borrower 2 LLC, and 146 E 89 Borrower 3 LLC (the "JJ Arch Controlled Entities" or individually a "JJ Arch Controlled Entity"); (2) the real properties known as 225 Head of Pond Road, Water Mill, New York 11976, 550 Metropolitan Avenue, Brooklyn, New York 11211, 550 Montauk Highway, Southampton, New York 11968, and 146 E. 89<sup>th</sup> Street, New York, New York 10128, and the business known as Rêver Motors (the "JJ Arch Controlled Properties" or individually a "JJ Arch Controlled Property"); and (3) JJ Arch's bank accounts, records, and funds, the JJ Arch Controlled Entities' funds, assets, properties, records, and bank accounts, upon the Receiver executing and acknowledging in the usual form, and filing with the Clerk of this Court, a bond to the People of the State of New York in the penal sum of \$50,000.00, with a duly authorized surety company as surety, or with at least two sufficient individual sureties who shall severally justify, conditioned for the faithful discharge of his or her duties and for all moneys or property of every kind received by him or her as such receiver, which bond is to be approved as to its sufficiency, form, and manner of execution and sufficiency of surety by a Justice of this Court; and it is further

**ORDERED**, that upon the filing of said bond so approved, the Receiver shall have complete and sole managerial authority over (1) the bank accounts, funds and records over which JJ Arch exercises control (the “Accounts”), including those belonging to the JJ Arch Controlled Entities, (2) the JJ Arch Controlled Entities in their entirety, and (3) the JJ Arch Controlled Properties in their entirety; and it is further

**ORDERED** that upon the filing of said bond so approved, the Receiver shall promptly evaluate any current offers to purchase any JJ Arch Controlled Property, and the underlying sales process that has been undertaken by JJ Arch or Jeffrey Simpson (“Simpson”) to determine its adequacy, and shall decide whether to accept and thereafter effectuate the purchase offer or offers, or reject any such offer or offers; and it is further

**ORDERED** that upon the filing of said bond so approved, the Receiver shall be authorized to: (i) manage, rent, lease, sell or develop the JJ Arch Controlled Properties, and take any other steps reasonably necessary to maximize the remaining equity belonging to the JJ Arch Controlled Entities, (ii) refinance or renegotiate any of the JJ Arch Controlled Entities mortgages or loans, (iii) undertake an accounting of JJ Arch and the JJ Arch Controlled Entities and the JJ Arch Controlled Properties; (iv) prepare and file tax returns for JJ Arch and the JJ Arch Controlled Entities and the JJ Arch Controlled Properties; (v) appear in, defend or settle any foreclosure proceeding relating to the JJ Arch Controlled Entities and the JJ Arch Controlled Properties; (vi) file and prosecute Chapter 7 bankruptcy liquidation proceedings for any JJ Arch Controlled Entity or any JJ Arch Controlled Property as the Receiver deems necessary to maximize the value of any JJ Arch Controlled Entity or the remaining total equity of JJ Arch as a whole; and (vii) take such other actions or dispositions of these assets as the Receiver deems

necessary to maximize the value of the JJ Arch Controlled Entities and JJ Arch Controlled Properties and to prevent waste and loss of value; and it is further

**ORDERED** that upon the filing of said bond so approved, the Receiver shall have the power and authority to do all things appropriate and necessary to carry out his obligations and authority as set forth in this Order, including without limitation commencing any legal action that may be necessary to collect, receive, protect or preserve the Accounts, the JJ Arch Controlled Entities or the JJ Arch Controlled Properties; and it is further

**ORDERED** that the appointee named herein shall comply with Section 35a of the Judiciary Law, Sections 6401-6404 of the C.P.L.R., Section 1325 of the R.P.A.P.L. and Rule 36 of the Chief Judge; and it is further

**ORDERED** that the Receiver shall not appoint an attorney, agent, appraiser, auctioneer, or accountant without prior approval of this Court, which approval may be obtained by letter application to the Court; and it is further

**ORDERED** that at least five (5) days prior to entering into any proposed contract of sale of any JJ Arch Controlled Property, or filing a Chapter 7 liquidation proceeding for any JJ Arch Controlled Entity, the Receiver shall send a letter to the Court informing the Court and the parties of the terms and details of the proposed sale or filing; and it is further

**ORDERED** that the Receiver may use the proceeds of any sale of any JJ Arch Controlled Property or any other funds collected or obtained by the Receiver to pay off the outstanding mortgage debt of another JJ Arch Controlled Property or JJ Arch Controlled Entity, prepare and file tax returns, obtain reasonably necessary insurance for another JJ Arch Controlled Property, defend or otherwise address foreclosure proceedings, and use such funds to

maximize the overall equity of JJ Arch in or from the JJ Arch Controlled Entities and JJ Arch Controlled Properties, and otherwise hold any sums remaining; and it is further

**ORDERED** that JJ Arch and Simpson (and Chassen, to the extent he possesses any of the following articles), shall immediately provide the Receiver with (1) all books and records and books of account of JJ Arch and the JJ Arch Controlled Entities, (2) an inventory of all assets belonging to the JJ Arch Controlled Entities, including a list of vehicles at, or that were at, Rever Motors, since August 16, 2023 whether titled in Simpson's name, the name of any entity controlled by Simpson, or the name of a JJ Arch Controlled Entity; (3) a list of all employees at the JJ Arch Controlled Entities or JJ Arch Controlled Properties since August 16, 2023, any payroll records for such employees, and any evidence that payroll taxes were paid for such employee(s); (4) copies of all filed tax returns for JJ Arch and the JJ Arch Controlled Entities to the extent such exist, and all tax correspondence from or to the Internal Revenue Service or any other governmental entity; (5) all banking records for JJ Arch and the JJ Arch Controlled Entities; (6) all books, logs, spreadsheets, and other documents detailing the transactions at the JJ Arch Controlled Entities and funds and assets belonging to the JJ Arch Controlled Entities; (7) keys to, or any other items, codes, or similar required to access, JJ Arch Properties, and (8) any other documents requested by the Receiver and necessary or helpful for the Receiver to fulfil his or her duties under this Order. For the avoidance of doubt, the obligations of this paragraph are required of both Simpson and Chassen (to the extent Chassen possesses the records and items), and the fact that one or the other of Simpson and Chassen can produce these records and items does not obviate the obligation of the other to produce the same upon request by the Receiver; and it is further

**ORDERED** that neither Simpson nor Chassen shall communicate with the Receiver except through counsel unless otherwise requested by the Receiver in writing, but in the event one or both does not have counsel, unless otherwise requested by the Receiver in writing, the pro se party may communicate via email only during business hours, copying the other party and any counsel on all such email correspondence, and shall cease doing so if the Receiver makes a written request to the pro se party that the pro se party cease such communications; and it is further

**ORDERED** that where Simpson and Chassen can agree on a course of action, such as a sale or other disposition of an asset, and do so in writing to the Receiver, the Receiver may take that course of action, unless in the Receiver's judgment that course of action is unreasonable or inadvisable; and it is further

**ORDERED** that the Receiver does not need to seek or obtain the consent of Simpson or Chassen to effectuate any of his or her duties or authorizations under this Order; and it is further

**ORDERED** that neither Simpson nor Chassen may interfere with the Receiver in exercising his or her duties; and it is further

**ORDERED** that the Receiver may, at his or her discretion, and provided there are sufficient funds, employ Simpson or Chassen, or both, to work at Rêver Motors in a non-managerial role provided that neither Simpson nor Chassen shall have anything other than viewing access to the accounts, funds, or records of Rêver Motors, and such employment will be under the supervision of the Receiver or a manager acting on behalf of the Receiver; and it is further,

**ORDERED** that in the event the Receiver chooses to employ Simpson or Chassen or both at Rêver Motors, and either wishes to take such employment, such employment shall be at

will and each shall be compensated at an hourly rate not to exceed \$25 per hour, unless the Receiver requests a higher rate of pay and such request is approved by the Court; and it is further

**ORDERED** that during the period until the Receiver posts the undertaking as required herein, Simpson shall remain enjoined from transferring, encumbering, or otherwise disposing of or dissipating JJ Arch assets (which shall include sales of real property), except for routine expenses in the ordinary course of business; and it is further

**ORDERED** that nothing herein abrogates or modifies the prior orders of this Court governing JJ Arch's interests in Arch Real Estate Holdings, LLC ("AREH"), including but not limited to the order entered at NYSCEF No. 418. For the avoidance of doubt, the Receiver shall not control JJ Arch's membership interests or consent rights in AREH, which shall remain governed by the Court's prior orders, including NYSCEF No. 418; and it is further

**ORDERED** except as modified herein or superseded by the appointment of a Receiver as provided herein, the Court's prior orders at NYSCEF No. 36, 86, 159 and 419, and the rights provided therein, remain in full force and effect unless and until the Court determines otherwise. Simpson and Chassen shall remain members of JJ Arch, unless and until the Court determines otherwise. No Company Major Decision (NYSCEF No. 36, 86, 159, 419) may be undertaken by Simpson without Chassen's prior written consent unless and until the Court determines otherwise. For the avoidance of any doubt, neither Simpson nor Chassen shall unilaterally file any bankruptcy for JJ Arch without the other's consent; it is further

**ORDERED** that upon notice to the parties, the Receiver may seek interim commission(s) and approval of Receiver's expenses (including the fees and expenses of professionals retained by Receiver in accordance with this order) on a periodic basis. Receiver is authorized to pay approved interim commissions, expenses and fees out of any funds collected by, or assets

liquidated by, Receiver pursuant to this Order. Such fees paid by the Receiver to other professionals retained by Receiver shall not be payable out of, or deemed part of, Receiver's commissions; it is further

**ORDERED** that JJ Arch is solely responsible for any and all expenses, costs and/or fees incurred by Receiver, including fees and expenses of other professionals retained by Receiver, in connection with his receivership and performance of his duties pursuant to this Order; and it is further

**ORDERED** that the Receiver shall be compensated in accordance with relevant governing law, subject to Court approval.

IT IS SO ORDERED.



20250311164604JMCOHEN1B2E1E3E68F2450QB127504A4AD28E50

JOEL M. COHEN, J.S.C.

3/11/2025

DATE

CHECK ONE:

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CASE DISPOSED

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GRANTED

DENIED

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NON-FINAL DISPOSITION

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OTHER

APPLICATION:

SETTLE ORDER

GRANTED IN PART

CHECK IF APPROPRIATE:

INCLUDES TRANSFER/REASSIGN

SUBMIT ORDER

<input type="checkbox"/>
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FIDUCIARY APPOINTMENT

<input type="checkbox"/>
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REFERENCE

## **Exhibit B**



**Southampton Town Police Department**  
ACCREDITED LAW ENFORCEMENT AGENCY

As of Mon Apr 07 09:35:00 EDT 2025

**Incident Report**

CC# <b>ST25012105</b>	Pct <b>STPD</b>	Sector <b>C42</b>	Car <b>STC43</b>	Incident Type <b>DISP CIVIL</b>	Classification <b>Body worn camera video - Yes; In car video - No; Shooting Incident - No; Incident GEF</b>
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**INCIDENT**

Report Date <b>03/24/2025</b>	Report Time <b>11:11</b>	Report Day <b>Mon</b>	Date (Occurred on/from) <b>03/24/2025</b>	Time <b>11:11</b>	Day <b>Mon</b>	Date (Occurred to) <b>03/24/2025</b>	Time <b>12:02</b>
Business name and type <b>CORRIGAN'S SERVICE STATION</b>						Town Code <b>T/SOUTHAMPTON - 5258</b>	

## Incident address

**1640 MONTAUK HWY, WATER MILL, New York, 11976****ASSOCIATED PERSONS**

Person Type: C=Complainant V=Victim E=Aided A=Arrested S=Suspect M=Missing Person W=Witness P=Person Interviewed O=Other

Per <b>1</b>	Type <b>C</b>	Name <b>JEFFREY SIMPSON</b>	D.O.B. [REDACTED]	Sex [REDACTED]	Race [REDACTED]	Offense [REDACTED]	
Address [REDACTED]			[REDACTED]	[REDACTED]	Home Tel # [REDACTED]	Work Tel # [REDACTED]	Cell Tel # [REDACTED]
Per <b>2</b>	Type <b>P</b>	Name <b>ERIC HUEBSHER</b>	D.O.B. [REDACTED]	Sex [REDACTED]	Race [REDACTED]	Offense [REDACTED]	
Address [REDACTED]			[REDACTED]	[REDACTED]	Work Tel # [REDACTED]	Cell Tel # [REDACTED]	

**NARRATIVE**

The reporting officer responded to the incident location in reference to a civil dispute. Complainant states that the other party involved is not wanted on his property and is refusing to leave. The other party involved states that he is the court ordered receiver of the property and everything on it and is there to collect files from the business regarding same. The complainant states that the court order was dismissed and the other party does not have rights to the property anymore, and the other party states the opposite. The subject was asked to leave the property and go forward with the issue in civil court, and he agreed. Nothing further to report at this time.

Victim did receive information on Victim's Rights and Services pursuant to NYS Law  Yes  No**OFFICERS**

Name <b>SPENCER, CONNOR</b>	Rank <b>Police Officer</b>	Badge # <b>PO/186</b>	Classification <b>Reporting officer; Responding officer; Dispatched officer</b>
Name <b>MENDOLA, JESSICA</b>	Rank <b>Police Officer</b>	Badge # <b>PO/1298</b>	Classification <b>Dispatched officer</b>
Name <b>SOUTHAMPTON PATROL</b>	Rank [REDACTED]	Badge # [REDACTED]	Classification <b>Investigating unit; Reporting unit</b>

**ADMINISTRATIVE**

Teletype No [REDACTED]	Connected CC #'s [REDACTED]	Status Date <b>03/24/2025</b>	Confidential <input type="checkbox"/>
Status <b>Closed/cleared</b>			

CC# <b>ST25012105</b>	Reporting / Investigating Officer <b>PO/186 SPENCER, CONNOR</b>	Supervisor [REDACTED]
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## **Exhibit C**

**From:** SCSO Civil Property <[scso.civilproperty@suffolkcountyny.gov](mailto:scso.civilproperty@suffolkcountyny.gov)>  
**Date:** April 22, 2025 at 3:56:37 PM EDT  
**To:** "ehuebscher huebscherconsulting.com" <[ehuebscher@huebscherconsulting.com](mailto:ehuebscher@huebscherconsulting.com)>  
**Subject: Re: [External] Simpson v. Chassen: Index No. 58055/2023; Temporary Receivership Order**

Hello Mr. Huebscher,

The documents you emailed have been reviewed. None of your documents direct the Suffolk County Sheriff's Office to enforce anything. If you want an eviction enforced, you have to go to court and get a Warrant To Remove and there are fees to be paid to the Sheriff's Office. The Warrant To Remove specifically directs the Suffolk County Sheriff's to enforce an eviction. If you get a Warrant to Remove, the Eviction Department's phone number is 631-852-5621. The Eviction Department will inform you of fees and copies of the warrant needed.

Second, we would not turn over a business to you and none of your documents state anything like that. If you won a money judgment and want the Sheriff to enforce the judgment, you would need to get a property execution and pay the Sheriff's fees.

You probably need an attorney to help you with these documents.  
If you have other questions, please do not hesitate to call our office.

Sincerely,  
Lorie Kane  
Suffolk County Sheriff's Office  
Civil Enforcement Bureau  
Principal Office Assistant  
631-852-5628 phone  
631-852-5631 fax  
[Lorinda.Kane@suffolkcountyny.gov](mailto:Lorinda.Kane@suffolkcountyny.gov)

---

**From:** ehuebscher huebscherconsulting.com <[ehuebscher@huebscherconsulting.com](mailto:ehuebscher@huebscherconsulting.com)>  
**Sent:** Tuesday, April 22, 2025 3:01 PM  
**To:** SCSO Civil Property <[scso.civilproperty@suffolkcountyny.gov](mailto:scso.civilproperty@suffolkcountyny.gov)>  
**Cc:** John Giambone <[JGiambone@southamptontownny.gov](mailto:JGiambone@southamptontownny.gov)>; Martin G. Bunin <[mbunin@farrellfritz.com](mailto:mbunin@farrellfritz.com)>; Darren A. Pascarella <[dpascarella@farrellfritz.com](mailto:dpascarella@farrellfritz.com)>  
**Subject:** [External] Simpson v. Chassen: Index No. 58055/2023; Temporary Receivership Order

**STOP | THINK | ACT**

External email detected. Do not click on links or open attachments from unknown sources. Be alert for phishing attempts & report suspicious email IT Security.



Good afternoon:

Thank you for taking the time to speak with me this afternoon. Attached, please find the Subject court order and related bond. I need to enforce this court order. The Suffolk County entities/property//businesses are located at

225 Head of Pond Rd, Water Mill, NY 11976 (unoccupied residential house that is on the market to be sold)

Rever Motors/1640 Motor LLC – 1640 Montauk Highway, Water Mill, NY 11976 (car restoration business)

I need to enforce the court order in all respects, which includes prohibiting Jeffrey Simpson from entering either property or business. I also need to take immediate operational control over Rever Motors.

Please let me know next steps and when a Sheriff can meet me at both sites to assist in enforcement.

Thank you.  
Eric Huebscher

Eric Huebscher, MBA, CPA, CFE, CPCO  
President  
Huebscher & Co.  
301 East 87<sup>th</sup> Street – 20E  
New York, NY 10128  
Phone – 646.584.3141  
Mobile – 917.763.3891  
EFAX – 212-202-3503

#### Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

## **Exhibit D**

**From:** Jeffrey Simpson <[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)>

**Date:** April 22, 2025 at 5:52:09 PM EDT

**To:** [ProSe@nysd.uscourts.gov](mailto:ProSe@nysd.uscourts.gov)

**Cc:** Martin Bunin <[MBunin@farrellfritz.com](mailto:MBunin@farrellfritz.com)>, "ehuebscher huebscherconsulting.com"  
<[ehuebscher@huebscherconsulting.com](mailto:ehuebscher@huebscherconsulting.com)>, "robert lorenclaw.com" <[robert@lorenclaw.com](mailto:robert@lorenclaw.com)>, Benjamin  
Robert Rajotte <[rajb@mllg.nyc](mailto:rajb@mllg.nyc)>, Jared Chassen <[jaredchassen@gmail.com](mailto:jaredchassen@gmail.com)>, [allen@allenschwartzlaw.com](mailto:allen@allenschwartzlaw.com),  
Leslie Thorne <[leslie.thorne@haynesboone.com](mailto:leslie.thorne@haynesboone.com)>, "jkoevary\_olshanlaw.com" <[jkoevary@olshanlaw.com](mailto:jkoevary@olshanlaw.com)>,  
"Hon. Joel M. Cohen" <[jmcohen@nycourts.gov](mailto:jmcohen@nycourts.gov)>

**Subject: Re: Receiver to stand down NYS 158055-2023, 1:25-CV-02372 (LTS) EMERGENCY**

So still after all the back-and-forth this Eric Huebscher guy still thinks he could go to my properties and attack. He is tampering with mail, locks etc.. it has come to my attention that he arrived at a property of mine this morning trying to cause issues and the police somehow arrived and told him to leave.

I literally left my property this morning to go to visit the SDNY to check the jurisdictional issues that are happening here for me to find out that this man has the nerve to trespass after he's been told to stand down.

I just called him on the phone and warned him one more time he is not to step foot on one of my properties without consent which he is not granted any. His answer on the phone was don't call me again. This man belongs nowhere near JJ Arch or Jeffrey Simpson. I will ask the police to press charges at this point for harassment.

When does the harassment end? Thank you New York State for causing a disaster around everything tied to my name without merit, without due process, without legitimacy. What a shame that the system is so broken.

Jeffrey Simpson

Sent from my iPhone

On Apr 14, 2025, at 3:26 PM, Jeffrey Simpson <[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)>  
wrote:

Further proof of a man who is self-serving and believes he gets to step into my company and my business because somehow a judge gave him some authority that was not proper, was not authorized by the managing member , who's at risk. There is a reason this action was removed to the federal court because of theft and the breach of federal law

And somehow a motion was made by someone who is a crook and had no standing especially after he admitted to his guilt. That is of course Mr. Jared Chassen.

I would love for somebody from our government local or federal to tell me how someone who admits the theft and guilt in court , a judge who said he did extra illegal activity has the right to step in and do damage based upon what ?

This is a mockery of our system and how you doing someone here is corrupt or simply blinded. This must stop now.

<Screenshot 2025-04-14 at 2.24.57 PM.jpeg>

Jeffrey Simpson

Sent from my iPhone

On Apr 14, 2025, at 2:17 PM, Jeffrey Simpson  
<[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)> wrote:

Dear SDNY (prose intake for Judge Swain)  
I'm sorry to send e mail this way, I don't have access to ECF filing. These folks don't stop their harassment. Per my note over the weekend , we need Court intervention. I literally left my family in the middle of Passover because of the anxiety of this malfeasance that continues. And yet again I find another incident where this individual Eric Huebscher seems to think he's above the law and he could just trespass and cause issues at my properties. He was not installed with good merit or with any authority on the person that made the action because that individual, Jared Chassen, committed perjury to the federal and state court in order to achieve his goals. I am pleading with the court to help me stop this nonsense now. No one should live this way with people attacking everything they've ever built and State Court that is either clueless or intentionally looking the other way to the bad acts that are occurring for almost 2 years now .  
I did a visit with the FBI (white collar crime unit) this morning to give them further briefing of the destruction that's happening surrounding this case, I cannot say if they will or will not further investigate the illegal and improper actions that are recurring from the other parties here. I have been pleading to the southern district since December 2024 that the matters are urgent and the attacks are against my civil rights and my constitutional rights. I plead with the court to stop this madness and allow for a chance to explore and investigate exactly what has

happened here properly with due process, with witnesses, with evidence with an unbiased court. The damages to me and others escalate by the day while these folks continue to break the law without any enforcement whatsoever. Given that this situation is in Southampton I am now waiting for the Southampton police to arrive to hopefully take a report on this for the record.

I am still investigating the mail fraud issue from last week and I have not heard back from the post office yet.

Thank you for your help.

<IMG\_4079.jpeg>  
<IMG\_4078.jpeg>

Jeffrey Simpson

Sent from my iPhone

On Apr 13, 2025, at 11:02 PM, Jeffrey Simpson  
<[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)> wrote:

Thank you, yes the pro se intake unit office was copied on the email for filing.  
I will confirm with them in the morning they received.

Jeffrey Simpson

Sent from my iPhone

On Apr 13, 2025, at 10:13 PM, NYSD Swain Corresp  
<[SwainNYSDcorresp@nysd.uscourts.gov](mailto:SwainNYSDcorresp@nysd.uscourts.gov)> wrote:

To submit a document for filing or any response emails, you must follow the Clerk's Office's guidelines and procedures, which are available on the Court's website under the section PRO SE (SELF REPRESENTATION), which can be

found here:  
<https://nysd.uscourts.gov/prose>.

We would like to remind you of the  
Chief Judge's individual rules:

*Special notice to pro se parties:* Pro se parties are directed to submit all filings and communications addressed to Judge Swain, *whether related to a case pending before the Court, or to a matter the party wishes to direct to Judge Swain in her capacity as Chief Judge*, through the Court's Pro Se Intake Unit. Information about the Court's Pro Se Intake Unit and how to submit filings to that Unit is available on the Court's website, at <https://www.nysd.uscourts.gov/prose>. Submissions emailed, mailed, or faxed directly to Judge Swain's chambers by pro se parties may be disregarded.

Any further correspondence/emails between parties sent to this email address will remain unanswered and will go directly to junk mail.

Sincerely,  
Chambers of the Honorable Chief  
Judge Laura Taylor Swain

---

**From:** Jeffrey Simpson  
<[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)>  
**Sent:** Saturday, April 12, 2025 3:35 PM  
**To:** Martin Bunin  
<[MBunin@farrellfritz.com](mailto:MBunin@farrellfritz.com)>; Eric  
Huebscher  
<[ehuebscher@huebscherconsulting.com](mailto:ehuebscher@huebscherconsulting.com)>  
**Cc:** robert lorenclaw.com  
<[robert@lorenclaw.com](mailto:robert@lorenclaw.com)>; Benjamin  
Robert Rajotte <[rajb@mllg.nyc](mailto:rajb@mllg.nyc)>; Hon.  
Joel M. Cohen  
<[jmcohen@nycourts.gov](mailto:jmcohen@nycourts.gov)>;  
[emergency@nycourts.gov](mailto:emergency@nycourts.gov); Jared

Chassen <[jaredchassen@gmail.com](mailto:jaredchassen@gmail.com)>;  
[allen@allenschwartzlaw.com](mailto:allen@allenschwartzlaw.com);  
jkoevary\_olshanlaw.com  
<[jkoevary@olshanlaw.com](mailto:jkoevary@olshanlaw.com)>; Leslie  
Thorne  
<[leslie.thorne@haynesboone.com](mailto:leslie.thorne@haynesboone.com)>;  
NYSD Swain Corresp  
<[SwainNYSDcorresp@nysd.uscourts.gov](mailto:SwainNYSDcorresp@nysd.uscourts.gov)>; Pro Se Filing  
<[pro\\_se\\_filing@nysd.uscourts.gov](mailto:pro_se_filing@nysd.uscourts.gov)>  
**Subject:** Re: Receiver to stand down  
NYS 158055-2023, 1:25-CV-02372 (LTS)  
EMERGENCY

CAUTION - EXTERNAL:

Eric Huebscher,

I just got an alarming phone call from the broker (compass) for 225 head of pond, an RE asset of JJ Arch LLC, which I am the sole managing member (and member) of. It appears that you are circumventing the brokers contractual agreement and fraudulently hiring other parties without authority or jurisdiction.

You are clearly aware that the case has been removed to the federal court and there has not been any active motion practice yet.

I remind you how you invaded the property at 1640 Montauk improperly and the police removed you for trespassing. You have also tried to invade the bank accounts this past week.

Chassen's motion for a receiver had no standing or contractual merit as he officially told the NYS court on 2/25/25, under sworn testimony, that he resigned effectively August 4, 2023 by working for my former partners, oak . In addition, although the court told chassen in February 2024 (by Order) that he had no ability to stop sales of any transactions, he has breached and tried anyways. He also committed

perjury to the bankruptcy court saying that he hasn't worked for anybody else. His lawyer committed perjury by telling the New York State court that he hasn't worked for anyone else.

This house was publicly and commercially marketed for almost 8 months and resulted in \$1.5 million after \$1.45 million as the original bid. We had a contract ready to be signed. The below illustrates a broker that you engaged to sell less than what was achieved after an 8 month process. Compass, the broker, sent a comps report (sent to court) to determine this value and price. Chassen also told NYS Court, under testimony that the house is worth \$1.7 million, and he felt he had good reason to object to a "fire" sale which he had no contractual authority to do. In addition he admitted that he put an improper lis pendens on the property during the midst of a bankruptcy action (the same one in which you were the chapter 5 trustee and were engaged to be an advocate for). The NYS Court transcript illustrates this. According to Judge Joel Cohen's February order he had no ability to object to a sale anyway. Even though his member interests have been vacated for almost 2 years, I have used best efforts to obtain consent from the court regardless.

The court warned Chassen that if he were to stop a sale (at 1.5) or solicit a price of equal or less value he would be subject to the damages of the difference. He continued anyway and took on this risk which he had no authority to do anyways, contractually.

I objected to the receiver, I've objected to you (for conflict ) and the process at large because none of this should happen given what the contractual documents say. And that is why we are in a different forum now, the federal law has been triggered and that will get

adjudicated when the court renders a decision.

During the request for receiver the question came up of who would pay for it. There was no answer granted so it appears that one who has the role of receiver, if it was proper and official, would be motivated to sell assets to pay themselves rather than for the greater good of the partnership which had a dissolution action effective September 2024.

It has come to my attention that you or Chassen have also committed US Postal Service fraud as it relates to 1640 montauk. It's my understanding that you threatened the broker for 550 metropolitan asset too.

It is unusual for partnerships to seek a receiver in the first place and in this circumstance , dissolution already commenced so what would a receiver do? It Is my understanding even if a receiver were granted under appropriate channels that they still have a duty to those who are the beneficiaries, that is not what's happening here.

Given that these actions are happening on the weekend, I am sending these notes to the court simultaneously via email versus through electronic systems to make sure the Court (s) see in real time what's happening here.

Once again, I urge you to stand down until such point in time where the federal court has a chance to properly hear the action and render a decision. If you choose not to, I will have to make further inquiries to law-enforcement agencies.

Thank you.

Jeffrey Simpson

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary.  
Exercise caution when opening attachments or clicking on links.

<image001.png>

Jeffrey Simpson

Sent from my iPhone

> On Apr 9, 2025, at 10:02 AM, Jeffrey Simpson <[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)> wrote:

> In light of your outreach to the broker for 550 metropolitan and two citizens bank you are clearly not taking direction and don't understand that the person that sought a receiver is a criminal and stole from me and broke the penal law besides breached every possible agreement. As I told you we will be notified the federal court today that you've decided to take matters into your own hands even though I've removed this entire case to the federal court to solve for the problems of the attacks that I'm seeing from folks like you who think you could simply steal from me. You cannot do it and is it illegal. You are put on notice and I will notify the federal court today of emergency needs with your actions.

>

> Have a nice day

>

>

> Jeffrey Simpson

>

> Sent from my iPhone

>

>> On Apr 8, 2025, at 5:09 PM, Jeffrey

Simpson <[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)>

wrote:

>>

>> Again, Farrell Fritz looked at the case for me so a conflict. Eric, extorted me during JJ Arch bankruptcy, conflict

>>

>> I removed these cases to the federal

court for a reason to protect my constitutional rights. Chassen had no authority to do anything including make a motion for a receiver because he resigned from the company almost 2 years ago. And he admitted it on the witness stand and he lied to the fed and BK court and lied to the state court. So I do not authorize you in anyway because there are no other members other than me. All has been said to the federal court so you will stand down and do nothing until the federal court speaks to the contrary. I have been attacked by my civil rights in countless ways and if you're going to participate in it that's fine you're just going to be pursued accordingly because you're out of line just like the day you showed up and I told the police to get you out of my property.

>>

>> I have a religious observance a Passover coming up around the corner and I do not need this improper harassment and it's not lawful. If I am unable to observe my holiday because of your actions, it just gets added to the case. So tell me what is you're going to do, stand down and wait for the federal court or keep doing what you're doing and I will skip my observance for the holiday and I will fight for what's right in an emergency action where more theft is attempted from me.

>>

>> I expect a response or I will do what I have to do immediately in the federal court.

>>

>> Jeffrey Simpson

>>

>> Sent from my iPhone

## **Exhibit E**

**From:** [Jeffrey Simpson](#)  
**To:** [Bunin, Martin](#); [Eric Huebscher](#)  
**Cc:** [robert.lorenclaw.com](#); [Benjamin Robert Rajotte](#); [Hon. Joel M. Cohen](#); [emergency@nycourts.gov](#); [Jared Chassen](#); [allen@allenschwartzlaw.com](#); [Jonathan T. Koevary](#); [Leslie Thorne](#); [SwainNYSDCorresp@nysd.uscourts.gov](#); [ProSe@nysd.uscourts.gov](#)  
**Subject:** Re: Receiver to stand down NYS 158055-2023, 1:25-CV-02372 (LTS) EMERGENCY  
**Date:** Saturday, April 12, 2025 3:35:49 PM  
**Attachments:** [IMG\\_0231.PNG](#)

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[You don't often get email from jsimpson001@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

\*\*\*\*\*  
\* Warning: External Email \*  
\*\*\*\*\*

Eric Huebscher,

I just got an alarming phone call from the broker (compass) for 225 head of pond, an RE asset of JJ Arch LLC, which I am the sole managing member (and member) of. It appears that you are circumventing the brokers contractual agreement and fraudulently hiring other parties without authority or jurisdiction.

You are clearly aware that the case has been removed to the federal court and there has not been any active motion practice yet.

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I objected to the receiver, I've objected to you (for conflict ) and the process at large because none of

this should happen given what the contractual documents say. And that is why we are in a different forum now, the federal law has been triggered and that will get adjudicated when the court renders a decision.

During the request for receiver the question came up of who would pay for it. There was no answer granted so it appears that one who has the role of receiver, if it was proper and official, would be motivated to sell assets to pay themselves rather than for the greater good of the partnership which had a dissolution action effective September 2024.

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It is unusual for partnerships to seek a receiver in the first place and in this circumstance , dissolution already commenced so what would a receiver do? It Is my understanding even if a receiver were granted under appropriate channels that they still have a duty to those who are the beneficiaries, that is not what's happening here.

Given that these actions are happening on the weekend, I am sending these notes to the court simultaneously via email versus through electronic systems to make sure the Court (s) see in real time what's happening here.

Once again, I urge you to stand down until such point in time where the federal court has a chance to properly hear the action and render a decision. If you choose not to, I will have to make further inquiries to law-enforcement agencies.

Thank you.

Jeffrey Simpson



Jeffrey Simpson

Sent from my iPhone

> On Apr 9, 2025, at 10:02 AM, Jeffrey Simpson <jsimpson001@icloud.com> wrote:  
> In light of your outreach to the broker for 550 metropolitan and two citizens bank you are clearly not taking direction and don't understand that the person that sought a receiver is a criminal and stole from me and broke the penal law besides breached every possible agreement. As I told you we will be notified the federal court today that you've decided to take matters into your own hands even though I've removed this entire case to the federal court to solve for the problems of the attacks that I'm seeing from folks like you who think you could simply steal from me. You cannot do it and is it illegal. You are put on notice and I will notify the federal court today of emergency needs with your actions.  
>  
> Have a nice day  
>  
>  
>  
> Jeffrey Simpson

>  
> Sent from my iPhone  
>  
>> On Apr 8, 2025, at 5:09 PM, Jeffrey Simpson <jsimpson001@icloud.com> wrote:  
>>  
>> Again, Farrell Fritz looked at the case for me so a conflict. Eric, extorted me during JJ Arch  
bankruptcy, conflict  
>>  
>> I removed these cases to the federal court for a reason to protect my constitutional rights.  
Chassen had no authority to do anything including make a motion for a receiver because he resigned  
from the company almost 2 years ago. And he admitted it on the witness stand and he lied to the fed  
and BK court and lied to the state court. So I do not authorize you in anyway because there are no  
other members other than me. All has been said to the federal court so you will stand down and do  
nothing until the federal court speaks to the contrary. I have been attacked by my civil rights in  
countless ways and if you're going to participate in it that's fine you're just going to be pursued  
accordingly because you're out of line just like the day you showed up and I told the police to get  
you out of my property.  
>>  
>> I have a religious observance a Passover coming up around the corner and I do not need this  
improper harassment and it's not lawful. If I am unable to observe my holiday because of your  
actions, it just gets added to the case. So tell me what is you're going to do, stand down and wait for  
the federal court or keep doing what you're doing and I will skip my observance for the holiday and I  
will fight for what's right in an emergency action where more theft is attempted from me.  
>>  
>> I expect a response or I will do what I have to do immediately in the federal court.  
>>  
>> Jeffrey Simpson  
>>  
>> Sent from my iPhone

## **Exhibit F**

**From:** [Jeffrey Simpson](#)  
**To:** [ProSe@nysd.uscourts.gov](#)  
**Cc:** [Bunin, Martin](#); [Eric Huebscher](#); [robert.lorenclaw.com](#); [Benjamin Robert Rajotte](#); [Jared Chassen](#); [allen@allenschwartzlaw.com](#); [Leslie Thorne](#); [ikoevary.olshanlaw.com](#)  
**Subject:** Re: Receiver to stand down NYS 158055-2023, 1:25-CV-02372 (LTS) EMERGENCY  
**Date:** Monday, April 14, 2025 2:18:43 PM  
**Attachments:** [IMG\\_4079.jpeg](#)  
  [IMG\\_4078.jpeg](#)

---

[Warning: External Email]

Dear SDNY (prose intake for Judge Swain)

I'm sorry to send e mail this way, I don't have access to ECF filing. These folks don't stop their harassment. Per my note over the weekend , we need Court intervention. I literally left my family in the middle of Passover because of the anxiety of this malfeasance that continues.

And yet again I find another incident where this individual Eric Huebscher seems to think he's above the law and he could just trespass and cause issues at my properties. He was not installed with good merit or with any authority on the person that made the action because that individual, Jared Chassen, committed perjury to the federal and state court in order to achieve his goals. I am pleading with the court to help me stop this nonsense now. No one should live this way with people attacking everything they've ever built and State Court that is either clueless or intentionally looking the other way to the bad acts that are occurring for almost 2 years now .

I did a visit with the FBI (white collar crime unit) this morning to give them further briefing of the destruction that's happening surrounding this case, I cannot say if they will or will not further investigate the illegal and improper actions that are recurring from the other parties here. I have been pleading to the southern district since December 2024 that the matters are urgent and the attacks are against my civil rights and my constitutional rights. I plead with the court to stop this madness and allow for a chance to explore and investigate exactly what has happened here properly with due process, with witnesses, with evidence with an unbiased court. The damages to me and others escalate by the day while these folks continue to break the law without any enforcement whatsoever. Given that this situation is in Southampton I am now waiting for the Southampton police to arrive to hopefully take a report on this for the record.

I am still investigating the mail fraud issue from last week and I have not heard back from the post office yet.

Thank you for your help.



Jeffrey Simpson

Sent from my iPhone

On Apr 13, 2025, at 11:02 PM, Jeffrey Simpson <[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)> wrote:

Thank you, yes the pro se intake unit office was copied on the email for filing. I will confirm with them in the morning they received.

Jeffrey Simpson

Sent from my iPhone

On Apr 13, 2025, at 10:13 PM, NYSD Swain Corresp <SwainNYSDcorresp@nysd.uscourts.gov> wrote:

To submit a document for filing or any response emails, you must follow the Clerk's Office's guidelines and procedures, which are available on the Court's website under the section PRO SE (SELF REPRESENTATION), which can be found here:

<https://nysd.uscourts.gov/prose>.

**We would like to remind you of the Chief Judge's individual rules:**

***Special notice to pro se parties:*** Pro se parties are directed to submit all filings and communications addressed to Judge Swain, ***whether related to a case pending before the Court, or to a matter the party wishes to direct to Judge Swain in her capacity as Chief Judge,*** through the Court's Pro Se Intake Unit. Information about the Court's Pro Se Intake Unit and how to submit filings to that Unit is available on the Court's website, at <https://www.nysd.uscourts.gov/prose>. Submissions emailed, mailed, or faxed directly to Judge Swain's chambers by pro se parties may be disregarded.

**Any further correspondence/emails between parties sent to this email address will remain unanswered and will go directly to junk mail.**

Sincerely,

Chambers of the Honorable Chief Judge Laura Taylor Swain

---

**From:** Jeffrey Simpson <jsimpson001@icloud.com>

**Sent:** Saturday, April 12, 2025 3:35 PM

**To:** Martin Bunin <MBunin@farrellfritz.com>; Eric Huebscher <ehuebscher@huebscherconsulting.com>

**Cc:** robert.lorenclaw.com <robert@lorenclaw.com>; Benjamin Robert Rajotte <rajb@mllg.nyc>; Hon. Joel M. Cohen <jmcohen@nycourts.gov>; emergency@nycourts.gov; Jared Chassen <jaredchassen@gmail.com>;

allen@allenschwartzlaw.com; jkoevary\_olshanlaw.com  
<jkoevary@olshanlaw.com>; Leslie Thorne  
<leslie.thorne@haynesboone.com>; NYSD Swain Corresp  
<SwainNYSDcorresp@nysd.uscourts.gov>; Pro Se Filing  
<pro\_se\_filing@nysd.uscourts.gov>  
**Subject:** Re: Receiver to stand down NYS 158055-2023, 1:25-CV-02372  
(LTS) EMERGENCY

CAUTION - EXTERNAL:

Eric Huebscher,

I just got an alarming phone call from the broker (compass) for 225 head of pond, an RE asset of JJ Arch LLC, which I am the sole managing member (and member) of. It appears that you are circumventing the brokers contractual agreement and fraudulently hiring other parties without authority or jurisdiction.

You are clearly aware that the case has been removed to the federal court and there has not been any active motion practice yet.

I remind you how you invaded the property at 1640 Montauk improperly and the police removed you for trespassing. You have also tried to invade the bank accounts this past week.

Chassen's motion for a receiver had no standing or contractual merit as he officially told the NYS court on 2/25/25, under sworn testimony, that he resigned effectively August 4, 2023 by working for my former partners, oak . In addition, although the court told chassen in February 2024 (by Order) that he had no ability to stop sales of any transactions, he has breached and tried anyways. He also committed perjury to the bankruptcy court saying that he hasn't worked for anybody else. His lawyer committed perjury by telling the New York State court that he hasn't worked for anyone else.

This house was publicly and commercially marketed for almost 8 months and resulted in \$1.5 million after \$1.45 million as the original bid. We had a contract ready to be signed. The below illustrates a broker that you engaged to sell less than what was achieved after an 8 month process. Compass, the broker, sent a comps report (sent to court) to determine this value and price. Chassen also told NYS Court, under testimony that the house is worth \$1.7 million, and he felt he had good reason to object to a "fire" sale which he had no contractual authority to do. In addition he admitted that he put an improper lis pendis on the property during the midst of a bankruptcy action (the same one in which you were the chapter 5 trustee and were engaged to be an advocate

for). The NYS Court transcript illustrates this. According to Judge Joel Cohen's February order he had no ability to object to a sale anyway. Even though his member interests have been vacated for almost 2 years, I have used best efforts to obtain consent from the court regardless.

The court warned Chassen that if he were to stop a sale (at 1.5) or solicit a price of equal or less value he would be subject to the damages of the difference. He continued anyway and took on this risk which he had no authority to do anyways, contractually.

I objected to the receiver, I've objected to you (for conflict ) and the process at large because none of this should happen given what the contractual documents say. And that is why we are in a different forum now, the federal law has been triggered and that will get adjudicated when the court renders a decision.

During the request for receiver the question came up of who would pay for it. There was no answer granted so it appears that one who has the role of receiver, if it was proper and official, would be motivated to sell assets to pay themselves rather than for the greater good of the partnership which had a dissolution action effective September 2024.

It has come to my attention that you or Chassen have also committed US Postal Service fraud as it relates to 1640 montauk. It's my understanding that you threatened the broker for 550 metropolitan asset too.

It is unusual for partnerships to seek a receiver in the first place and in this circumstance , dissolution already commenced so what would a receiver do? It Is my understanding even if a receiver were granted under appropriate channels that they still have a duty to those who are the beneficiaries, that is not what's happening here.

Given that these actions are happening on the weekend, I am sending these notes to the court simultaneously via email versus through electronic systems to make sure the Court (s) see in real time what's happening here.

Once again, I urge you to stand down until such point in time where the federal court has a chance to properly hear the action and render a decision. If you choose not to, I will have to make further inquiries to law-enforcement agencies.

Thank you.

Jeffrey Simpson

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

<image001.png>

Jeffrey Simpson

Sent from my iPhone

> On Apr 9, 2025, at 10:02 AM, Jeffrey Simpson

<[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)> wrote:

> In light of your outreach to the broker for 550 metropolitan and two citizens bank you are clearly not taking direction and don't understand that the person that sought a receiver is a criminal and stole from me and broke the penal law besides breached every possible agreement. As I told you we will be notified the federal court today that you've decided to take matters into your own hands even though I've removed this entire case to the federal court to solve for the problems of the attacks that I'm seeing from folks like you who think you could simply steal from me. You cannot do it and is it illegal. You are put on notice and I will notify the federal court today of emergency needs with your actions.

>

> Have a nice day

>

>

> Jeffrey Simpson

>

> Sent from my iPhone

>

>> On Apr 8, 2025, at 5:09 PM, Jeffrey Simpson

<[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)> wrote:

>>

>> Again, Farrell Fritz looked at the case for me so a conflict. Eric, extorted me during JJ Arch bankruptcy, conflict

>>

>> I removed these cases to the federal court for a reason to protect my constitutional rights. Chassen had no authority to do anything including make a motion for a receiver because he resigned from the company almost 2 years ago. And he admitted it on the witness stand and he lied to the fed and BK court and lied to the state court. So I do not authorize you in anyway because there are no other members other than me. All has been said to the federal court so you will stand down and do nothing until the federal court speaks to the contrary. I have been attacked by my civil rights in countless ways and if you're going to participate in it

that's fine you're just going to be pursued accordingly because you're out of line just like the day you showed up and I told the police to get you out of my property.

>>

>> I have a religious observance a Passover coming up around the corner and I do not need this improper harassment and it's not lawful. If I am unable to observe my holiday because of your actions, it just gets added to the case. So tell me what is you're going to do, stand down and wait for the federal court or keep doing what you're doing and I will skip my observance for the holiday and I will fight for what's right in an emergency action where more theft is attempted from me.

>>

>> I expect a response or I will do what I have to do immediately in the federal court.

>>

>> Jeffrey Simpson

>>

>> Sent from my iPhone

## **Exhibit G**



**Martin G. Bunin**

Counsel

Direct Dial: 646.329.1982  
 Direct Fax: 646.329.1992  
 mbunin@farrellfritz.com

622 Third Avenue  
 New York, NY 10017  
 www.farrellfritz.com

Our File No.  
 35477-123

March 26, 2025

**BY EMAIL**

Allen Schwartz, Esq.  
 Schwartz Law PLLC  
 150 Broadway, Suite 701  
 New York, NY 10038

Robert C. Lorenc, Esq.  
 The Lorenc Law Firm  
 62 West 45<sup>th</sup> Street, Suite 903  
 New York, NY 10036

**Re: *Jeffrey Simpson v. Jared Chassen, et al.*, Index No. 158055/2023**

Dear Messrs. Schwartz and Lorenc:

We are proposed counsel to Eric Huebscher, in his capacity as court-appointed receiver (the “Receiver”) over: (1) JJ Arch’s managerial and membership interests in the JJ Arch Controlled Entities; (2) the JJ Arch Controlled Properties; and (3) JJ Arch’s bank accounts, records, and funds, and the JJ Arch Controlled Entities’ funds, assets properties, records, and bank accounts, pursuant to the Order Appointing Temporary Receiver dated March 11, 2025 (NYSCEF Doc. No. 1360) (the “Receivership Order”).<sup>1</sup>

As directed by the Receivership Order, demand is made that JJ Arch, Mr. Simpson and Mr. Chassen provide the Receiver with the following by Wednesday, April 2, 2025:

1. All books and records and books of account of JJ Arch and the JJ Arch Controlled Entities;
2. An inventory of all assets belonging to the JJ Arch Controlled Entities, including a list of vehicles at, or that were at, Rever Motors, since August 16, 2023, whether title is in Mr. Simpson’s name, the name of any entity controlled by Mr. Simpson, or the name of a JJ Arch Controlled Entity;
3. The original certificates of title for each vehicle owned by any of the JJ Arch Controlled Entities;
4. A list of all employees at the JJ Arch Controlled Entities or JJ Arch Controlled Properties since August 16, 2023, all payroll records for such employees, and any evidence that payroll taxes were paid for such employees;
5. Copies of all filed tax returns for JJ Arch and the JJ Arch Controlled Entities, and all correspondence from or to the Internal Revenue Service or any other governmental entity;
6. All banking records for JJ Arch and the JJ Arch Controlled Entities;
7. All books, logs, spreadsheets, and other documents detailing the transactions at the JJ Arch Controlled Entities and funds and assets belonging to the JJ Arch Controlled

---

<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Receivership Order.

Messrs. Schwartz and Lorenc  
March 26, 2025  
Page 2

- Entities;
8. Keys to, or any other items, codes, or similar required to access the JJ Arch Properties;
  9. All appraisals, broker price opinions, or other valuations of the JJ Arch Controlled Entities and the JJ Arch Properties;
  10. All loan documents to which any of the JJ Arch Controlled Entities are a party or that relate to any of the JJ Arch Properties; and
  11. All contracts to which any of the JJ Arch Controlled Entities are a party.

We thank you in advance for your cooperation.

Best regards,

By: /s/Martin G. Bunin  
Martin G. Bunin

## **Exhibit H**

**From:** [Jeffrey Simpson](#)  
**To:** [Bunin, Martin](#); [Eric Huebscher](#)  
**Cc:** [robert.lorenclaw.com](#); [Benjamin Robert Rajotte](#)  
**Subject:** Receiver to stand down  
**Date:** Tuesday, April 8, 2025 5:09:39 PM

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[You don't often get email from jsimpson001@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

\*\*\*\*\*

\* Warning: External Email \*

\*\*\*\*\*

Again, Farrell Fritz looked at the case for me so a conflict. Eric, extorted me during JJ Arch bankruptcy, conflict

I removed these cases to the federal court for a reason to protect my constitutional rights. Chassen had no authority to do anything including make a motion for a receiver because he resigned from the company almost 2 years ago. And he admitted it on the witness stand and he lied to the fed and BK court and lied to the state court. So I do not authorize you in anyway because there are no other members other than me. All has been said to the federal court so you will stand down and do nothing until the federal court speaks to the contrary. I have been attacked by my civil rights in countless ways and if you're going to participate in it that's fine you're just going to be pursued accordingly because you're out of line just like the day you showed up and I told the police to get you out of my property.

I have a religious observance a Passover coming up around the corner and I do not need this improper harassment and it's not lawful. If I am unable to observe my holiday because of your actions, it just gets added to the case. So tell me what is you're going to do, stand down and wait for the federal court or keep doing what you're doing and I will skip my observance for the holiday and I will fight for what's right in an emergency action where more theft is attempted from me.

I expect a response or I will do what I have to do immediately in the federal court.

Jeffrey Simpson

Sent from my iPhone

## **Exhibit I**

**From:** [Allen Schwartz](#)  
**To:** [Bunin, Martin](#); [ehuebscher huebscherconsulting.com](#)  
**Subject:** Fwd: JJ NY 550 LLC and 1640 Montauk LLC  
**Date:** Friday, March 28, 2025 1:04:42 PM

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[Warning: External Email]

Allen Schwartz, Esq.  
Schwartz Law PLLC  
150 Broadway, Suite 701  
New York, NY 10038  
Tel: 347-460-5379  
Cell: 773-808-8972  
Email: [Allen@allenschwartzlaw.com](mailto:Allen@allenschwartzlaw.com)

----- Forwarded message -----

From: <[jaredchassen@gmail.com](mailto:jaredchassen@gmail.com)>  
Date: Fri, Mar 28, 2025 at 12:53 PM  
Subject: Fwd: JJ NY 550 LLC and 1640 Montauk LLC  
To: Allen Schwartz <[Allen@allenschwartzlaw.com](mailto:Allen@allenschwartzlaw.com)>

Jared Chassen

Begin forwarded message:

**From:** Jeffrey Simpson <[jsimpson001@icloud.com](mailto:jsimpson001@icloud.com)>  
**Date:** March 28, 2025 at 12:38:50 PM EDT  
**To:** [jaredchassen@gmail.com](mailto:jaredchassen@gmail.com)  
**Cc:** Barry Akrongold <[bbakrongold@fortunefinancialllc.com](mailto:bbakrongold@fortunefinancialllc.com)>  
**Subject: Re: JJ NY 550 LLC and 1640 Montauk LLC**

The case has been removed to the federal court and he knows that and Jared admitted to his theft of company assets on a witness stand just two weeks ago, so he is not even a member. The judge is on the take and the federal court will chime in and the receiver is out of his jurisdiction at this point so he has no ability to do anything either other than am order by the federal court as I objected to his appointment because he also is conflicted and on the take.

So everything is going to sit status quo until the federal court chimes in and even before that Jared had no rights or authority to do anything anyway so this conversation with him is moot and should be disregarded

Jeffrey Simpson

Sent from my iPhone

On Mar 28, 2025, at 12:14 PM, [jaredchassen@gmail.com](mailto:jaredchassen@gmail.com) wrote:

Pursuant to a Court order entered by the New York County Supreme Court on March 11, 2025, Eric Huebscher was appointed temporary receiver with control, among other things, over 1640 Montauk LLC and JJ NY 550 LLC. Mr. Huebscher likely requested the payoff statement from you. Nonetheless, in my capacity as a guarantor-defendant in the two foreclosure actions, I hereby also request a payoff statement for both

Jared Chassen

On Mar 27, 2025, at 9:59 PM, Barry Akrongold <[bbakrongold@fortunefinancialllc.com](mailto:bbakrongold@fortunefinancialllc.com)> wrote:

Gentleman,

Please confirm that you have requested a payoff letter for both properties through April 15, 2025.

Thank you

Watermill Capital Holdings LLC

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

-----X  
JEFFREY SIMPSON, individually and derivatively,  
as managing member of JJ ARCH LLC,  
suing derivatively as managing member of  
ARCH REAL ESTATE HOLDINGS LLC,  
and JJ ARCH LLC,

*Plaintiffs*

Index No. 158055/2023

-against-

Justice Joel M. Cohen

JARED CHASSEN and FIRST REPUBLIC BANK,

*Defendants*

-----X  
JARED CHASSEN, individually and derivatively  
on behalf of JJ ARCH LLC, as member,  
and derivatively on behalf of  
ARCH REAL ESTATE HOLDINGS LLC,  
as member of JJ ARCH LLC,

*Counterclaim Plaintiff*

-against-

JEFFREY SIMPSON and YJ SIMCO LLC,

*Counterclaim Defendants*

-and-

JJ ARCH LLC and  
ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendants*

-----X  
608941 NJ, INC.

*Plaintiff*

-against-

JEFFREY SIMPSON, JJ ARCH LLC and ARCH REAL  
ESTATE HOLDINGS LLC,

*Defendants,*

-and-

ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendant*

-----x

**AFFIRMATION OF JARED CHASSEN IN SUPPORT OF ORDER TO SHOW CAUSE**

STATE OF NEW YORK )  
                        )  
                        ) ss.:  
COUNTY OF NEW YORK     )

Jared Chassen, being duly deposed, affirms under penalty of perjury pursuant to CPLR 2106 as follows:

1. I am the defendant and counter-claim plaintiff in the above-captioned action and a member of JJ Arch LLC. I submit this affirmation in support of my order to show cause seeking to hold Jeffrey Simpson in contempt of this Court and for sanctions.

2. Though I have a motion for contempt already long-pending, Motion Sequence No. 13, Simpson has defied the Court's orders entered after I filed that motion, including the orders that the Court recently entered appointing a temporary receiver over the entities controlled by JJ Arch, namely 1640 Montauk LLC, 1640 Motors LLC, JJ NY 550 LLC, 225 HPR LLC, 146 E 89 Borrower 1 LLC, 146 E 89 Borrower 2 LLC, and 146 E 89 Borrower 3 LLC, and the assets they own.

3. I move by Order to Show Cause because Simpson's defiance of the receiver orders is harming me as Simpson continues to prevent the receiver from taking control and from accessing information. In appointing the receiver, this Court found by clear and convincing evidence that without a receiver, there was a danger that these assets would be materially injured

or destroyed. Among other things, this motion is filed on an emergent basis to obtain Simpson's immediate compliance by incarcerating him or fining him until he complies.

### I. Simpson's Defiance of the November 18, 2024 TRO

4. On October 28, 2024, I filed an Emergency Order to Show Cause which seeks, among other things, to hold Simpson in civil and criminal contempt of the Court's prior orders.

*See* NYSCEF Nos. 711-756.<sup>1</sup> That motion remains pending.<sup>2</sup>

5. On November 18, 2024, this Court issued a temporary restraining order that ordered Simpson to give me records and account access:

ORDERED that Simpson immediately provide, and continue to provide, Chassen with (1) complete access to the bank accounts of JJ Arch and its Investment Entities (as defined in the JJ Arch LLC Operating Agreement), (2) JJ Arch and its Investment Entities' books and records as previously requested by Chassen in his books and records demands, and (3) a complete listing of all transactions at JJ Arch and its Investment Entities during the pendency of the bankruptcy proceeding . . .

*See* NYSCEF No. 941.

6. Simpson was served with this order via personal service (NYSCEF No. 949), and via email. NYSCEF No. 1011.

7. Simpson openly refused to comply with this order, with the Court copied on emails he sent my counsel. NYSCEF No. 1248 is a true and correct copy of the email chain with Simpson, which is also available at NYSCEF No. 944. NYSCEF No. 1249 is a true and correct

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<sup>1</sup> Citations to NYSCEF refer to documents previously filed on the docket in this action. Any documents cited to NYSCEF in this affirmation, the memorandum of law, or any other documents submitted in connection with this motion are expressly incorporated herein and are part of the record of this motion.

<sup>2</sup> On March 19, 2025, I submitted a supplemental affirmation and other papers in support of the pending contempt motion. *See* NYSCEF Nos. 1372-1379. The papers in support of that motion are incorporated into this motion by reference.

copy of a further email chain with Simpson, which is also available at NYSCEF No. 955. At his deposition, Simpson confirmed that he sent these emails in which he said he was not going to comply. NYSCEF No. 1374, Simpson Dep. Tr. at 278:6-285:6. Thereafter, Simpson continued to do nothing to ensure my access, and did not provide me with the bank statements themselves as he easily could have done. He provided no books and records nor a complete listing of the transactions during the bankruptcy.

8. On January 14, 2025, the Court told Simpson on the record that if he failed to give me access “promptly,” my then pending motion for a temporary receiver would be granted on this basis alone. NYSCEF No. 1067 at 26:1-3. Still, Simpson did nothing until the day before his deposition, when on February 12, 2025, he sent an email to Ms. Shradha Lama of Citizens Bank asking for her to help get me access. NYSCEF No. 1159. After his communications to Citizens Bank, Citizens Bank quickly resolved the issue, which they purported was an internal issue, and I finally obtained access to the Citizens Bank account on February 14, 2025, after filing multiple, motions, letters, and briefs. The upshot is that slightest effort by Simpson was all that was required, but Simpson refused for months to take this minimal step, despite multiple motions, letters, briefs, and a pending contempt motion.

9. Simpson has still failed to give me access to the books and records I requested or the ledger of his transactions during the bankruptcy.

## **II. Simpson’s Defiance of the Receiver Orders**

10. On March 7, 2025, this Court entered the Decision and Order granting my motion seeking to appoint a temporary receiver over the assets controlled by JJ Arch (the “First Receiver Order”). NYSCEF No. 1352, First Receiver Order. In the First Receiver Order, the Court also

enjoined Simpson from transferring assets outside the ordinary course of business pending the appointment of the receiver.

11. On March 11, 2025, the Court entered an order appointing a temporary receiver, Eric Huebscher, which similarly enjoined Simpson from transferring assets until the receiver took control of the assets (the “Second Receiver Order”). NYSCEF 1360, Second Receiver Order.<sup>3</sup>

12. Simpson has openly and willfully defied both the First and Second Receiver Orders (together “the Receiver Orders”).

***A. Simpson Continues to Transfer Funds to Unidentified Recipients and Refuses to Disclose their Identities***

13. Simpson continued to transfer assets belonging to 1640 Motors LLC. On March 7, 2025, Simpson effectuated a wire transfer from 1640 Motors’s Citizens Bank account in the amount of \$10,000.00 to an unknown receipt. *See Ex. 1*, March 2025 Bank Statement. On March 11, 2024, Simpson effectuated another \$10,000.00 wire transfer to an unknown recipient. *Id.* On March 31, 2025, Simpson effectuated a \$3,500.00 wire transfer to an unknown recipient. *Id.* On April 3, 2025, Simpson effectuated a wire transfer in the amount of \$14,500.00 to an unknown recipient *See Ex. 2*, April 2025 Bank Withdrawal Printout. On April 4, 2025, Simpson effectuated a wire transfer in the amount of \$3,846.00 to an unknown recipient. *Id.* On April 8, 2025, Simpson effectuated a wire transfer in the amount of \$15,000.00 to an unknown recipient. *Id.* On April 14, 2025, Simpson effectuated a wire transfer in the amount of \$3,846.15 to an unknown recipient. *Id.* On April 18, 2025, Simpson effectuated a wire transfer in the amount of

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<sup>3</sup> In addition to his counsel, Simpson received each of these orders because he is a registered NYSCEF e-filer in this action and has consented to electronic personal service.

\$3,846.15 to an unknown recipient. *Id.* On April 18, 2025, Simpson also transferred \$1000.00 to YJ Simco LLC. *Id.*

14. When I asked Citizens Bank to identify the recipients of transfers, Simpson directed Citizens Bank not to give me that information. NYSCEF No. 1377, Simpson Mar. 13, 2025 Email.

***B. Simpson Ongoing Refusal to Cede Control to the Receiver***

15. Even after the Receiver posted the undertaking and bond, Simpson continued to defy the Receiver Orders.

16. While the Receiver Orders barred Simpson from interfering with the Receiver, (NYSCEF No. 1360 at 6), at 11:20 p.m. on March 19, 2025, Simpson e-filed on NYSCEF a purported notice of removal that was post-dated to March 20, 2025, which he filed for the purpose of interfering with the Receiver. NYSCEF No. 1380-1382, Notice of Removal. At 3:53 a.m. and 5:39 a.m. on March 20, 2025, Simpson then sent *ex parte* emails to the Court and federal judges stating that he was removing the cases to federal court. NYSCEF No. 1383-1. The Court posted these emails on NYSCEF and invited the parties to file letters indicating their position on the legal effect of Simpson's *ex parte* emails and post-dated notice of removal. NYSCEF No. 1383, Court Notice. Simpson responded by letter on NYSCEF that he was "dumbfounded" by this, and told the Court that "you will learn, I am and was a very effective leader by making informed and educated decisions and moving forward. This is not a 'free for all', *it is my business that you invaded in ways that are unconscionable.*" NYSCEF No. 1384, Simpson March 20, 2025 Letter to Court (emphasis added).

17. Next, Simpson filed an email to NYSCEF that he had sent to Judge Koeltl at 1:39 p.m. on March 20, 2025 in which he said "We have told the NYS judge that he is biased on

numerous occasions . . . [m]y instinct is that he will not ‘surrender’ to my Removal action until he is Ordered to do so.” NYSCEF No. 1387, Simpson Email to Judge Koeltl. Later that day, he again wrote the Court on NYSCEF telling the Court “It is that you are simply fearful for your wrongdoings and bias nature of your role on the bench that you cannot help yourself but attack the most successful guy in the room (before you have attempted to ruin my life by bad orders, bias commentary and simply swallowing your own words from one hearing to another) . . . I will not be communicating with this Court again unless I am told otherwise by a higher power in the Federal Court.” NYSCEF No. 1389, March 20, 2025 Letter to Court.

18. On March 24, 2025, Simpson filed on NYSCEF a letter addressed to the “NYS Court,” in which he told the Court that he had called the police on the receiver after the receiver entered the business owned by 1640 Motors LLC and 1640 Montauk LLC—entities in receivership—and prevented the receiver from fulfilling his duties despite the Court’s order that he could not interfere with the receiver’s exercise of his duties. NYSCEF No. 1406, March 24, 2025 Letter to Court.

19. The Receiver has testified that Simpson verbally assaulted him and had him removed from Rever Motors on March 24, 2025. NYSCEF No. 1436, Huebscher Affirm. at ¶¶ 10-17. This is also confirmed by the police report the Receiver attaches as an exhibit. NYSCEF No. 1438, Police Report. The Receiver Order barred Simpson from interfering with the Receiver’s exercise of his duties. NYSCEF No. 1360.

20. On March 25, 2025, Simpson filed evidence that he had effectuated the removal to this Court by filing screenshots of the ECF docket, and that day the Court issued a notice stating that it would take no further action until it received an order of remand from the federal court, but making it clear that “All orders of this Court entered prior to removal, including the

appointment of a receiver, remain in effect subject to any contrary orders made in the federal action." NYSCEF No. 1409, Court Notice.

21. On March 28, 2025, Simpson directed a lender of the entities subject to the receivership not to give a payoff statement to the receiver, claiming that the receiver had no authority because of this removal. NYSCEF No. 1445, March 28, 2025 Email. In this email, Simpson also impugned the Court and the receiver, telling the lender that the Court and the receiver were "on the take." *Id.*

22. On April 8, 2025, after business hours, Simpson emailed the Receiver telling him to "stand down" and that if he didn't, Simpson would pursue him "because you're out of line just like the day you showed up and I told the police to get you out of my property." He says:

I removed these cases to the federal court for a reason to protect my constitutional rights. Chassen had no authority to do anything including make a motion for a receiver because he resigned from the company almost 2 years ago. And he admitted it on the witness stand and he lied to the fed and BK court and lied to the state court. So I do not authorize you in anyway because there are no other members other than me. All has been said to the federal court so you will stand down and do nothing until the federal court speaks to the contrary. I have been attacked by my civil rights in countless ways and if you're going to participate in it that's fine you're just going to be pursued accordingly because you're out of line just like the day you showed up and I told the police to get you out of my property.

I have a religious observance a Passover coming up around the corner and I do not need this improper harassment and it's not lawful. If I am unable to observe my holiday because of your actions, it just gets added to the case. So tell me what is you're going to do, stand down and wait for the federal court or keep doing what you're doing and I will skip my observance for the holiday and I will fight for what's right in an emergency action where more theft is attempted from me. I expect a response or I will do what I have to do immediately in the federal court.

Jeffrey Simpson

Sent from my iPhone

NYSCEF No. 1444, Simpson Apr. 8, 2025 Email.

23. On April 12, 2025, Simpson wrote the Receiver, copying this Court, telling him that he had no authority or jurisdiction:

Eric Huebscher,

I just got an alarming phone call from the broker (compass) for 225 head of pond, an RE asset of JJ Arch LLC, which I am the sole managing member (and member) of. It appears that you are circumventing the brokers contractual agreement and fraudulently hiring other parties without authority or jurisdiction.

You are clearly aware that the case has been removed to the federal court and there has not been any active motion practice yet.

I remind you how you invaded the property at 1640 Montauk improperly and the police removed you for trespassing. You have also tried to invade the bank accounts this past week . . .

NYSCEF No. 1441, Simpson Apr. 12, 2025 Email.

24. On April 14, 2025, Simpson wrote the federal court, copying the Receiver, and telling the federal court that this Court is “clueless or intentionally looking the other way”:

Dear SDNY (prose intake for Judge Swain)

I'm sorry to send email this way, I don't have access to ECF filing. These folks don't stop their harassment. Per my note over the weekend, we need Court intervention. I literally left my family in the middle of Passover because of the anxiety of this malfeasance that continues.

And yet again I find another incident where this individual Eric Huebscher seems to think he's above the law and he could just trespass and cause issues at my properties. He was not installed with good merit or with any authority on the person that made the action because that individual, Jared Chassen, committed perjury to the federal and state court in order to achieve his goals. I am pleading with the court to help me stop this nonsense now. No one should live this way with people attacking everything they've ever built and State Court that is either clueless or intentionally looking the other way to the bad acts that are occurring for almost 2 years now.

I did a visit with the FBI (white collar crime unit) this morning to give them further briefing of the destruction that's happening surrounding this case, I cannot say if they will or will not further investigate the illegal and improper actions that are recurring from the other parties here. I have been pleading to the southern district since December 2024 that the matters are urgent and the attacks are

against my civil rights and my constitutional rights. I plead with the court to stop this madness and allow for a chance to explore and investigate exactly what has happened here properly with due process, with witnesses, with evidence with an unbiased court. The damages to me and others escalate by the day while these folks continue to break the law without any enforcement whatsoever. Given that this situation is in Southampton I am now waiting for the Southampton police to arrive to hopefully take a report on this for the record.

NYSCEF No. 1442, Simpson Apr. 14, 2025 Email.

25. Simpson then forwarded this email to this Court in an ex parte email, taunting the Court about his removal of this action:

It looks like the honorable Joel Cohen wasn't copied on the last response. It's important to see the fruits of your labor whereby your biased view has caused serious destruction for me (and \$100 million of investors) without any merit or cause or relevance but somehow you're sitting on the bench making these rulings without any merit. Send it to all parties if you like, again as you you'll see below I've brought this up not only to the CJC now but it's also brought it to the FBI, to find justice, not this version that is extremely biased and prejudiced against me with no merit.

Yes, the administrative judges are copied here too and I hope they finally pay attention to the actions of what you've taken and the damage that you've caused for a \$1 billion company that I built. It was not for your court to step in and cause this destruction for a crook and a criminal who is stealing from me but you have the nerve to somehow just prejudice me because you don't like me. That's not how it works as an elected official and certainly not as a judge. I hear you are doing it to others where you have this issue with people that are pro business and you think you get to from your seat destroy people's lives based upon your opinion of what you think documents should've said or what you think people are entitled to rather than what they've earned or are contractually owed. The NYS system is a mockery on society and you sir. You do not listen to anything with merit or facts.

I've taken this to the authorities to the highest level because you've destructed a man who didn't deserve anything like this and the documents don't allow for it and you have the audacity to continue to defend yourself when you know you've made mistakes whereby I've shown you the issues that you've done and you refuse to adhere to them or listen because of an ego or something greater than that, that hopefully we learn in some sort of investigation, God willing.

Justice must be served in our country, it was not founded on the principles of this type of behavior from the bench of a major city like New York. It is beyond unconstitutional besides unethical and improper.

Have a nice day  
Jeffrey Simpson  
Sent from my iPhone

NYSCEF No. 1418, Simpson Apr. 14, 2025 Email.

26. On April 25, 2025, the federal court remanded this proceeding because Simpson had failed to pay the filing fee. NYSCEF Nos. 1410-1412.

27. On April 29, 2025, the Receiver filed a motion seeking to enforce the Receiver Orders. NYSCEF Nos. 1435-1445 (the “Receiver’s Motion”). The Receiver’s Motion makes clear that Simpson has defied the Receiver Orders since they were entered:

**Expulsion from Rever Motors:** In addition to the March 24, 2025 expulsion, the Receiver was prevented from taking control on April 24, 2025, when he attempted again to gain control, this time with an armed guard “due to Simpson’s threatening behavior toward me on March 24 . . .” NYSCEF No. 1436 at ¶¶ 18-22.

**Contact by Phone and Text Message in Defiance of Court Order:** Simpson contacted the Receiver by phone—despite being directly prohibited from doing so in the Receiver Order—and threatened the Receiver. *Id.* at ¶ 20. Indeed, in an email he copied this Court on, he says, “I just called him on the phone and warned him one more time not to step foot on one of my properties . . .” NYSCEF No. 1440, Simpson Apr. 22, 2025 Email. He also sent a threatening text message directly to the Receiver, where he called him a “disgusting human,” a “money hungry pig,” and “the biggest crook I’ve ever met.” NYSCEF No. 1436, at ¶ 20.

**Resisting the Receiver’s Control of 225 Head of Pond Road:** The Receiver testified that Simpson also changed the locks at the real property at 225 Head of Pond Road. *Id.* at ¶¶ 25-31.

**Refusal to Provide any Books and Records:** The Receiver testified that Simpson provided no books and records or other information required by the Receiver Order. *Id.* at ¶¶ 32-34.

**Interference with a Lender:** the Receiver testified that Simpson directed a lender not to give the receiver information about a loan. *Id.* at ¶ 35.

28. The Court should hold Simpson in civil contempt, which does not require a showing of willfulness. I have been prejudiced by Simpson's disobedience, and I obtained these orders to protect my interests in JJ Arch and these entities. The lengthy almost two-month delay in the Receiver being able to take control, and Simpson's defiance of these orders, has harmed me. Further, Simpson has caused the Receiver to incur costs to enforce the Receiver Orders which will ultimately come out of JJ Arch, further depleting any remaining equity.

29. The Court should compel Simpson to comply with the Court's orders by, inter alia, ordering him fined and incarcerated until he complies in full with the Receiver Orders.

30. Further, the Court should order an inquest, or supplemental submissions, to determine the amount of my damages from Simpson's contempt and from the delay in the Receiver being able to effectuate his duties, which should also include all legal fees, costs, and damages connected with the removal to federal court and this motion.

31. Simpson should also be required to pay for any legal and other costs incurred by the Receiver in enforcing the Receiver Orders, as those costs should not be borne by JJ Arch, but by Simpson, who has necessitated the Receiver's legal filings and other measures to gain control over JJ Arch property.

32. The Court should also hold Simpson in criminal contempt. The dignity and power of this Court have been injured by Simpson, who has willfully disobeyed the Court's orders.

Simpson's correspondence that he filed on NYSCEF and to the SDNY shows that he has willfully and intentionally disobeyed the Court's orders. Without a criminal contempt finding, Simpson will continue to disregard orders with impunity and set an example for others who are similarly inclined to believe that court orders may be routinely disregarded.

33. The Court should impose the maximum penalty of 30 days incarceration and a fine of \$1000.00.

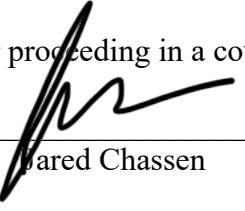
34. Finally, the Court should independently sanction Simpson for his frivolous litigation conduct, including his abusive communications, his bad-faith removals, and his disobedience of the Court.

### **Conclusion**

35. For the reasons detailed herein, the Court should grant my motion in its entirety together with such other and further relief the Court deems just and proper.

I affirm this 30th day of April, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

By:

  
Jared Chassen

**WORD COUNT CERTIFICATION**

Allen Schwartz hereby certifies that the annexed document contains less than 7000 words exclusive of the table of contents, signature block and caption and that I relied on Microsoft Word to ascertain the word count. Movant has requested permission herewith to submit this affirmation above the 7000 word-limit.

By: \_\_\_\_\_/s/  
Allen Schwartz



NYSCF Doc. No. 1480  
US747 | BR486 | 3  
ROP 450  
P.O. Box 7000  
Providence, RI 02940

1640 MOTORS LLC  
1640 MONTAUK HWY  
WATER MILL NY 11976-2633

RECEIVED NYSCEF: 05/01/2025

## Business Account Statement

Page 1 of 13

Beginning March 01, 2025  
through March 31, 2025

**Questions? Contact us today:**



**CALL:**

Business Account Customer Service  
1-800-862-6200



**VISIT:**

Access your account online:  
[citizensbank.com](http://citizensbank.com)



**MAIL:**

Citizens  
Customer Service Center  
P.O. Box 42001  
Providence, RI 02940-2001

1640 MOTORS LLC

Analysis Business Checking

XXXXXX-361-1

### Analysis Business Checking for XXXXXX-361-1

#### Balance Calculation

Previous Balance	18,744.46
Checks	- 5,849.28
Debits	- 154,205.28
Deposits & Credit	+ 152,216.68
<b>Current Balance</b>	<b>= 10,906.58</b>

Your next statement period will end on April 30, 2025.

#### TRANSACTION DETAILS FOR BUSINESS CHECKING ACCOUNT ENDING 361-1

<b>Checks</b> (Note - checks that are present out of numeric sequence are denoted with an asterisk (*))					<b>Previous Balance</b>
<b>Check #</b>	<b>Amount</b>	<b>Date</b>	<b>Check #</b>	<b>Amount</b>	<b>Date</b>
1137	350.00	03/07	32725*	4,974.28	03/31
1138	525.00	03/13			
					<b>Total Checks</b>
					- 5,849.28

Please See Additional Information on Next Page

**Analysis Business Checking for XXXXXX-361-1 Continued****Debits \*\****\*\*May include checks that have been processed electronically by the payee/merchant.***Total Debits****154,205.28**

Date	Amount	Description	Total Debits
03/03	29.71	4956 POS DEBIT - 128975 BOLLA OPERATIN OLD WESTBURY NY	-
03/03	16.30	3858 DBT PURCHASE - 000890 AMAZON PRIME*1 Amzn.com/b illWA	-
03/03	444.33	4956 DBT PURCHASE - 786655 NAPA AUTO PART BRIDGEHAMP TONNY	-
03/03	109.82	4956 POS DEBIT - 481670 CITARELLA BRIDGEHAMP TONNY	-
03/04	24.71	4956 DBT PURCHASE - 431 TST*HAMPTON CO Southampton NY	-
03/04	27.98	3858 DBT PURCHASE - 786656 NAPA AUTO PART BRIDGEHAMP TONNY	-
03/04	97.88	3858 DBT PURCHASE - 0001 LIBERTY IRON W 631-283-5151 NY	-
03/04	41.26	3858 DBT PURCHASE - 999999 WATER MILL BUI NEW YORK NY	-
03/04	65.23	3858 DBT PURCHASE - 999999 WATER MILL BUI NEW YORK NY	-
03/04	24.93	4956 DBT PURCHASE - 000000 SABROSA MEXICA WATER MILL NY	-
03/05	34.71	3858 DBT PURCHASE - 000000 AIRWELD INC PA PATCHOGUE NY	-
03/05	32.62	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY	-
03/05	22.46	3858 DBT PURCHASE - 000000 PARTS GEEK LLC 8005419352 NJ	-
03/05	81.56	3858 DBT PURCHASE - 999999 MSFT * E0600VF MSBILL.INFO WA	-
03/05	95.78	3858 DBT PURCHASE - 999999 MSFT * E0600VF MSBILL.INFO WA	-
03/05	13.58	4956 POS DEBIT - 053069 SHELL SERVICE WATER MILL NY	-
03/05	31.75	4956 POS DEBIT - 0354 MTA*LIRR STATION TJAMAICA NY	-
03/06	48.93	4956 DBT PURCHASE - 001 CARFAX *CARFAX CARFAX.COM VA	-
03/07	346.33	3858 DBT PURCHASE - 376008 RIMMER BROS LINCOLN	-
03/07	9.72	4956 DBT PURCHASE - 000100 TASTE NY LI WE DIX HILLS NY	-
03/07	149.00	3858 DBT PURCHASE - 000000 IPOSTAL*SUBSCR 8455795770 NY	-
03/07	51.11	4956 DBT PURCHASE - 000000 SABROSA MEXICA WATER MILL NY	-
03/07	30.00	4956 POS DEBIT - 0005 CUMBERLAND FARMS 1MANORVILLE NY	-
03/07	14.77	4956 POS DEBIT - 0200 CUMBERLAND FARMS 1MANORVILLE NY	-
03/07	10.39	FOREIGN CURRENCY FEE - 376008 RIMMER BROS LINCOLN	-
03/10	67.67	3858 DBT PURCHASE - 999999 WATER MILL BUI NEW YORK NY	-
03/10	273.81	3858 DBT PURCHASE - 0001 E-Z*PASSNY TOL 800-333-8655 NY	-
03/10	168.65	3858 DBT PURCHASE - 000000 NJ EZPASS NEWARK NJ	-

Please See Additional Information on Next Page



## Analysis Business Checking for XXXXXX-361-1 Continued

**Debits (Continued) \*\***

*\*\*May include checks that have been processed electronically by the payee/merchant.*

Date	Amount	Description
<b>ATM/Purchases (Continued)</b>		
03/10	55.00	3858 DBT PURCHASE - 000000 MONTANA SECRET HELENA MT
03/10	38.39	3858 DBT PURCHASE - 000 FEDEX484061935 MEMPHIS TN
03/10	186.70	3858 DBT PURCHASE - 7663 SINGLE SOURCE HOLBROOK NY
03/10	648.90	3858 DBT PURCHASE - 000000 SUNROOF SOURCE 8664098673 AZ
03/10	21.52	4956 POS DEBIT - 0005 CUMBERLAND FARMS 1MANORVILLE NY
03/10	202.28	4956 DBT PURCHASE - 2521 SHINNECOCK HAR SOUTHAMPTO N NY
03/10	79.66	4956 POS DEBIT - 481670 CITARELLA BRIDGEHAMP TONNY
03/10	9.81	4956 POS DEBIT - 868412 GULF BRIDGEHAM BRIDGEHAMP TO NY
03/10	215.58	3858 POS DEBIT - 000001 AMAZON.COM*WP0 SEATTLE WA
03/11	41.47	3858 DBT PURCHASE - 786656 NAPA AUTO PART BRIDGEHAMP TONNY
03/11	8.69	3858 DBT PURCHASE - 999999 WALGREENS #181 BRIDGEHAMP TONNY
03/11	16.37	3858 DBT PURCHASE - 999999 SPEEDWAY 07793 WATERMILL NY
03/11	1,145.50	3858 DBT PURCHASE - Q89TQH LSEAT.COM SUGAR LAND TX
03/11	21.91	4956 DBT PURCHASE - 000000 SABROSA MEXICA WATER MILL NY
03/11	500.00	3858 POS DEBIT - 690318 WORLDWIDEVI 8882211161 CA
03/12	900.00	3858 DBT PURCHASE - 999999 NB RIM REPAIR BAY SHORE NY
03/12	28.88	4956 DBT PURCHASE - 057 TST*HAMPTON CO Southampton NY
03/12	148.00	3858 DBT PURCHASE - 500110 NYS DMV TVB ALBANY NY
03/12	82.01	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/13	22.38	3858 DBT PURCHASE - 0001 E-Z*PASSNY TOL 800-333-86 55 NY
03/13	33.59	3858 DBT PURCHASE - 000101 GULF OIL 92045 BRIDGEHAMP TONNY
03/13	15.39	3858 DBT PURCHASE - 000101 GULF OIL 92045 BRIDGEHAMP TONNY
03/13	71.35	4956 POS DEBIT - 481670 CITARELLA BRIDGEHAMP TONNY
03/14	111.51	3858 DBT PURCHASE - 000 FEDEX484514070 MEMPHIS TN
03/14	44.86	3858 DBT PURCHASE - 999999 WATER MILL BUI NEW YORK NY
03/14	36.97	4956 POS DEBIT - 481670 CITARELLA BRIDGEHAMP TONNY
03/17	54.86	3858 DBT PURCHASE - 000 FEDEX484690286 MEMPHIS TN
03/17	15.76	4956 POS DEBIT - 053069 SHELL SERVICE WATER MILL NY
03/17	23.50	4956 POS DEBIT - 0354 MTA*LIRR STATION TJAMAICA NY
03/17	1,003.50	4956 ATM CASH - TW04B9 288 HIGHWAY 202/31FLEMINGTON NJ
03/17	27.58	4956 POS DEBIT - 0001 CUMBERLAND FARMS 1MANORVILLE NY

Please See Additional Information on Next Page

**Analysis Business Checking for XXXXXX-361-1 Continued****Debits (Continued) \*\****\*\*May include checks that have been processed electronically by the payee/merchant.*

<b>Date</b>	<b>Amount</b>	<b>Description</b>
<b>ATM/Purchases (Continued)</b>		
03/17	19.11	4956 POS DEBIT - 0100 CUMBERLAND FARMS 1MANORVILLE NY
03/17	3.00	NON-CITIZENS ATM FEE - TW04B9 288 HIGHWAY 202/31FLEMINGTON N
03/18	40.92	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/18	76.21	3858 DBT PURCHASE - 786655 NAPA AUTO PART BRIDGEHAMP TONNY
03/19	59.69	3858 DBT PURCHASE - 376008 RIMMER BROS LINCOLN
03/19	42.78	3858 DBT PURCHASE - TPCW1Z SP 66AUTOCOLOR JOPLIN MO
03/19	96.13	3858 POS DEBIT - 000001 AMAZON.COM*U15 SEATTLE WA
03/19	45.23	4956 POS DEBIT - 129600 KING KULL SNAK BRIDGEHAMP TONNY
03/19	16.27	3858 POS DEBIT - 000001 AMAZON.COM*AT1 SEATTLE WA
03/19	52.09	3858 POS DEBIT - 000001 AMAZON.COM*X39 SEATTLE WA
03/19	15.61	3858 POS DEBIT - 000000 AMAZON.COM*HV3 SEATTLE WA
03/19	18.48	3858 POS DEBIT - 000001 AMAZON.COM*RP6 SEATTLE WA
03/19	1.79	FOREIGN CURRENCY FEE - 376008 RIMMER BROS LINCOLN
03/20	476.95	3858 DBT PURCHASE - 7663 SINGLE SOURCE HOLBROOK NY
03/20	51.69	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/20	4.49	3858 DBT PURCHASE - 001 RINGCENTRAL IN 888-898-45 91 CA
03/20	28.26	3858 POS DEBIT - 000001 AMAZON.COM*VX0 SEATTLE WA
03/20	148.86	3858 POS DEBIT - 000001 AMAZON.COM*2Z7 SEATTLE WA
03/21	44.51	3858 DBT PURCHASE - 000 FEDEX485057242 MEMPHIS TN
03/21	25.80	4956 DBT PURCHASE - 000000 SABROSA MEXICA WATER MILL NY
03/21	35.07	4956 POS DEBIT - 053069 SHELL SERVICE WATER MILL NY
03/21	10.10	4956 POS DEBIT - 128868 EAST HILLS ENT ROSLYN HEI GHTNY
03/24	24.71	4956 DBT PURCHASE - 468 TST*HAMPTON CO Southampton NY
03/24	20.26	3858 DBT PURCHASE - 999999 ROVERS NORTH WESTFORD VT
03/24	1,418.93	3858 DBT PURCHASE - 7663 SINGLE SOURCE HOLBROOK NY
03/24	344.00	3858 DBT PURCHASE - KSKJRM WWW.SHOPMONKEY MORGAN HILL CA
03/24	16.30	3858 DBT PURCHASE - 000890 AMAZON PRIME*6 Amzn.com/b illWA
03/24	80.43	3858 POS DEBIT - 000001 AMAZON.COM*RX7 SEATTLE WA
03/24	28.26	3858 POS DEBIT - 000001 AMAZON.COM*GW5 SEATTLE WA
03/24	25.01	4956 POS DEBIT - 128185 JNK AUTO SERVI FLUSHING NY
03/24	20.00	4956 POS DEBIT - 128185 JNK AUTO SERVI FLUSHING NY
03/24	10.32	4956 DBT PURCHASE - 000100 TASTE NY LI WE DIX HILLS NY

Please See Additional Information on Next Page



## Analysis Business Checking for XXXXXX-361-1 Continued

**Debits (Continued) \*\***

*\*\*May include checks that have been processed electronically by the payee/merchant.*

Date	Amount	Description
<b>ATM/Purchases (Continued)</b>		
03/24	91.01	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/25	4.47	4956 DBT PURCHASE - 0002 STARBUCKS STOR FORT LEE NJ
03/25	62.07	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/25	163.50	4956 ATM CASH - WGD381 2102 MONTAUK HWY BRIDGEHAMP TONNY
03/25	3.00	NON-CITIZENS ATM FEE - WGD381 2102 MONTAUK HWY BRIDGEHAMP TO
03/26	49.22	3858 POS DEBIT - 000001 AMAZON.COM*4L2 SEATTLE WA
03/26	23.91	3858 POS DEBIT - 000001 AMAZON.COM*F23 SEATTLE WA
03/27	19.99	4956 DBT PURCHASE - FLH8OE VINCLARITY.COM SHERIDAN WY
03/27	750.00	3858 DBT PURCHASE - 004580 IN *VINOKUR AS 646-912279 1 NJ
03/27	57.08	3858 DBT PURCHASE - 001 MOSS MOTORS 800-667-78 72 CA
03/27	67.40	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/27	15.67	3858 DBT PURCHASE - 000101 GULF OIL 92045 BRIDGEHAMP TONNY
03/27	32.19	3858 DBT PURCHASE - 000101 GULF OIL 92045 BRIDGEHAMP TONNY
03/27	78.28	3858 DBT PURCHASE - 999999 eBay O*10-1288 San Jose CA
03/27	43.48	3858 DBT PURCHASE - 999999 eBay O*01-1289 San Jose CA
03/28	361.20	3858 DBT PURCHASE - 7663 SINGLE SOURCE HOLBROOK NY
03/28	134.96	3858 DBT PURCHASE - 999999 ROVERS NORTH WESTFORD VT
03/28	95.41	4956 DBT PURCHASE - 999999 WATER MILL BUI NEW YORK NY
03/28	85.93	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/28	67.26	4956 POS DEBIT - 907793 Speedway Watermill NY
03/31	378.00	3858 DBT PURCHASE - Q89TQH LSEAT.COM SUGAR LAND TX
03/31	52.90	3858 DBT PURCHASE - 999999 eBay O*14-1288 London
03/31	13.27	4956 DBT PURCHASE - 000000 SHELL OIL 5754 WATER MILL NY
03/31	378.15	4956 DBT PURCHASE - 2521 SHINNECOCK HAR SOUTHAMPTO N NY
03/31	85.10	4956 DBT PURCHASE - 000100 CITARELLA BRIDGEHAMP TONNY
03/31	1.48	FOREIGN CURRENCY FEE - 999999 eBay O*14-1288 London
<b>Other Debits</b>		
03/03	3,500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 506200I0MBC2 EPP ID: US25030381238080 Zelle JAXON WHITEHEAD 8006566561

Please See Additional Information on Next Page

**Analysis Business Checking for XXXXXX-361-1 Continued****Debits (Continued) \*\****\*\*May include checks that have been processed electronically by the payee/merchant.***Other Debits (Continued)**

03/03	120.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 506000M0D171 EPP ID: US25030181043776 Zelle LUIS P VERA 8006566561
03/03	1,300.00	PAYROLL PAYROLL 250303 16765373
03/03	1,296.30	INTUIT 53021379 PAYROLL 250303 16765373
03/03	1,248.84	INTUIT 53021379 PAYROLL 250303 16765373
03/03	1,002.42	INTUIT 53021379 PAYROLL 250303 16765373
03/03	891.13	INTUIT 53021379 PAYROLL 250303 16765373
03/03	505.66	INTUIT * QBooks Pay 250301 7787941
03/03	391.74	INTUIT 53021379 PAYROLL 250303 16765373
03/05	906.00	AFCO DIRECT IVR PAYMENTS 250304 22824244
03/06	1,050.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 506500G0AHP5 EPP ID: US25030681576101 Zelle KHUSNIDDI URINBOEV 8006566561
03/06	2,720.44	NEXTGEAR PAYMENT PAYMENT 030525 151812
03/06	1,180.23	NEXTGEAR PAYMENT PAYMENT 030525 151812
03/06	21.95	eBay Com6DHQJ0NN PAYMENTS 250306 UKC8IHXQNY7JN2N
03/07	10,000.00	OUTGOING WIRE TRANSFER (MTS NO.250307015152)
03/07	100.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 506600C0DNIT EPP ID: US25030781741579 Zelle WAY TO GO AUT 8006566561
03/07	1,360.96	INTUIT 53883110 PAYROLL 250307 16765373
03/10	750.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 506800J0FBQU EPP ID: US25030981917488 Zelle FRANCOIS GAUCI 8006566561
03/10	1,239.07	INTUIT 53889110 PAYROLL 250310 16765373
03/10	1,196.81	INTUIT 53889110 PAYROLL 250310 16765373
03/10	1,163.79	INTUIT 53889110 PAYROLL 250310 16765373
03/10	978.93	INTUIT 53889110 PAYROLL 250310 16765373
03/10	839.68	INTUIT 53889110 PAYROLL 250310 16765373
03/10	290.19	INTUIT 53889110 PAYROLL 250310 16765373
03/10	121.67	INTUIT 53889110 PAYROLL 250310 16765373
03/11	10,000.00	OUTGOING WIRE TRANSFER (MTS NO.250311006143)
03/11	50.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507000J0JJOG EPP ID: US25031182111450 Zelle WAY TO GO AUT 8006566561

Please See Additional Information on Next Page



## Analysis Business Checking for XXXXXX-361-1 Continued

**Debits (Continued) \*\***

*\*\*May include checks that have been processed electronically by the payee/merchant.*

**Other Debits (Continued)**

03/11	120.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507000H0I9YQ EPP ID: US25031182122764 Zelle LUIS P VERA 8006566561
03/11	500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507000C004MG EPP ID: US25031182176114 Zelle Yjsimco 8006566561
03/11	1,300.00	PAYROLL PAYROLL 250311 16765373
03/11	1,117.61	NEXTGEAR PAYMENT PAYMENT 031025 151812
03/11	415.03	NEXTGEAR PAYMENT PAYMENT 031025 151812
03/11	293.43	NEXTGEAR PAYMENT PAYMENT 031025 151812
03/12	700.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507100A05KQ8 EPP ID: US25031282247558 Zelle DAVID SIMPSON 8006566561
03/13	1,671.55	NEXTGEAR PAYMENT PAYMENT 031225 151812
03/13	125.27	NYC FINANCE PARKING TK 250313 C 427563816
03/14	1,503.71	INTUIT 54026802 PAYROLL 250314 16765373
03/14	1,391.28	INTUIT 54026802 PAYROLL 250314 16765373
03/14	1,147.42	INTUIT 54026802 PAYROLL 250314 16765373
03/14	1,066.79	INTUIT 54026802 PAYROLL 250314 16765373
03/14	1,052.76	INTUIT 54026802 PAYROLL 250314 16765373
03/14	445.56	INTUIT 54026802 PAYROLL 250314 16765373
03/14	340.88	INTUIT 54026802 PAYROLL 250314 16765373
03/14	252.81	INTUIT 54026802 PAYROLL 250314 16765373
03/14	95.00	NEXTGEAR PAYMENT PAYMENT 031325 151812
03/14	67.98	LIPA ONLINE PAY 250312 0268001760
03/17	1,500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507600J0C7KT EPP ID: US25031782821358 Zelle GERARD TARRANT 8006566561
03/17	1,500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507600C0E61A EPP ID: US25031782822171 Zelle GERARD TARRANT 8006566561
03/17	5,000.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507500E04TXM EPP ID: US25031682754840 Zelle GERARD TARRANT 8006566561
03/17	379.66	INTUIT 54593240 PAYROLL 250317 16765373
03/18	3,037.15	NEXTGEAR PAYMENT PAYMENT 031725 151812
03/18	836.69	NEXTGEAR PAYMENT PAYMENT 031725 151812

Please See Additional Information on Next Page

**Analysis Business Checking for XXXXXX-361-1 Continued****Debits (Continued) \*\***

*\*\*May include checks that have been processed electronically by the payee/merchant.*

**Other Debits (Continued)**

03/18	739.60	NEXTGEAR PAYMENT PAYMENT 031725 151812
03/18	486.28	NEXTGEAR PAYMENT PAYMENT 031725 151812
03/19	1,500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507800F01D3D EPP ID: US25031982991951 Zelle GERARD TARRANT 8006566561
03/19	315.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507800J0FVRW EPP ID: US25031982991970 Zelle Yjsimco 8006566561
03/19	120.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 507800I0F6YJ EPP ID: US25031982992025 Zelle LUIS P VERA 8006566561
03/21	2,500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 508000L0E17K EPP ID: US25032183251409 Zelle Yjsimco 8006566561
03/21	1,250.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 508000H0LE01 EPP ID: US25032183310374 Zelle LUCAS ZWIRNER 8006566561
03/21	1,500.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 508000C020YE EPP ID: US25032183311541 Zelle JER ACCOUNTIN 8006566561
03/24	120.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 508200D0HCHV EPP ID: US25032383507284 Zelle LUIS P VERA 8006566561
03/24	150.00	NOW NETWORK DEBIT ZELLE DEBIT NOW NET ID: 508100E0JC5U EPP ID: US25032283438068 Zelle DAVID SIMPSON 8006566561
03/24	1,502.76	INTUIT 54727403 PAYROLL 250324 16765373
03/24	1,318.19	INTUIT 54727403 PAYROLL 250324 16765373
03/24	1,291.70	INTUIT 54727403 PAYROLL 250324 16765373
03/24	1,247.26	INTUIT 54727403 PAYROLL 250324 16765373
03/24	869.63	INTUIT 54727403 PAYROLL 250324 16765373
03/24	306.11	NEXTGEAR PAYMENT PAYMENT 032125 151812
03/24	264.35	NEXTGEAR PAYMENT PAYMENT 032125 151812

Please See Additional Information on Next Page



## Analysis Business Checking for XXXXXX-361-1 Continued

### **Debits (Continued) \*\***

*\*\*May include checks that have been processed electronically by the payee/merchant.*

#### **Other Debits (Continued)**

03/24	195.72	INTUIT 54727403 PAYROLL 250324 16765373
03/24	117.19	INTUIT 54727403 PAYROLL 250324 16765373
03/24	66.50	INTUIT 54727403 PAYROLL 250324 16765373
03/25	17,636.90	NEXTGEAR PAYMENT PAYMENT 032425 151812
03/25	1,500.00	LIPA ONLINE PAY 250321 0268001761
03/25	1,000.00	LIPA ONLINE PAY 250321 0268001762
03/25	362.38	NEXTGEAR PAYMENT PAYMENT 032425 151812
03/25	352.29	NEXTGEAR PAYMENT PAYMENT 032425 151812
03/25	67.56	LIPA ONLINE PAY 250321 0268001760
03/26	906.00	AFCO DIRECT IVR PAYMENTS 250325 23211753
03/27	4,950.00	OUTGOING WIRE TRANSFER (MTS NO.250327015261)
03/28	290.00	NOW NETWORK DEBIT  ZELLE DEBIT  NOW NET ID: 508700M0AZ4I EPP ID: US25032884074054  Zelle DAVID SIMPSON 8006566561
03/28	1,400.00	NOW NETWORK DEBIT  ZELLE DEBIT  NOW NET ID: 508700K0G8RF EPP ID: US25032884087162  Zelle SAMANTHA BUSIELLO 8006566561
03/28	750.00	NOW NETWORK DEBIT  ZELLE DEBIT  NOW NET ID: 508700C0IKB5 EPP ID: US25032884087312  Zelle JER ACCOUNTIN 8006566561
03/31	3,500.00	OUTGOING WIRE TRANSFER (MTS NO.250331002597)
03/31	120.00	NOW NETWORK DEBIT  ZELLE DEBIT  NOW NET ID: 509000N0HODV EPP ID: US25033184429608  Zelle LUIS P VERA 8006566561
03/31	4,974.28	AFCO DIRECT PAYMENTS 250328 23282932
03/31	2,032.80	IRS USATAXPYMT 033125 227549066012014
03/31	2,014.48	IRS USATAXPYMT 033125 227549066012012
03/31	1,779.74	INTUIT 55107977 PAYROLL 250331 16765373
03/31	1,574.31	NEXTGEAR PAYMENT PAYMENT 032825 151812
03/31	1,384.50	INTUIT 55107977 PAYROLL 250331 16765373
03/31	1,231.57	INTUIT 55107977 PAYROLL 250331 16765373
03/31	1,204.22	INTUIT 55107977 PAYROLL 250331 16765373
03/31	1,181.00	INTUIT 55107977 PAYROLL 250331 16765373
03/31	1,081.09	INTUIT 23924292 TAX 250331 16765373
03/31	1,046.44	INTUIT 55107977 PAYROLL 250331 16765373
03/31	579.58	NEXTGEAR PAYMENT PAYMENT 032825 151812
03/31	505.66	INTUIT * QBooks Liv 250329 7926957
03/31	240.70	INTUIT 55107977 PAYROLL 250331 16765373

Please See Additional Information on Next Page

**Analysis Business Checking for XXXXX-361-1 Continued**

<b>Deposits &amp; Credits</b>			<b>Total Deposits &amp; Credits</b>
<b>Date</b>	<b>Amount</b>	<b>Description</b>	<b>+</b>
03/03	10,000.00	INCOMING WIRE TRANSFER (MTS NO.250303016307)	<b>152,216.68</b>
03/04	969.31	SHOPMONKEY SETTLEMENT 250304 52EBDA68-5E7D-4	
03/06	384.59	3858 DBT RETURN - 0001 NYU PHYSICIAN NEW YORK NY	
03/06	127.41	3858 DBT RETURN - 0001 NYU PHYSICIAN NEW YORK NY	
03/07	10,000.00	INCOMING WIRE TRANSFER (MTS NO.250307011499)	
03/07	5,000.00	INCOMING WIRE TRANSFER (MTS NO.250307009248)	
03/07	2,787.67	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 506600C0DG6D EPP ID: US25030781731055 Zelle LEE ALEXANDER 8006566561	
03/10	9,368.91	MOBILE DEPOSIT	
03/10	3,000.00	NEXTGEAR FUNDING FUNDING 031025 151812	
03/11	2,000.00	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 507000J0KDIU EPP ID: US25031182150881 Zelle JOYCE KLEINBERG 8006566561	
03/12	10,000.00	INCOMING WIRE TRANSFER (MTS NO.250312000356)	
03/14	5,000.00	INCOMING WIRE TRANSFER (MTS NO.250314000398)	
03/17	1,500.00	NOW NETWORK CREDIT ZELLE REFUND NOW NET ID: 507600J0C7KT EPP ID: US25031782826285 Zelle GERARD TARRANT 8006566561	
03/17	1,500.00	NOW NETWORK CREDIT ZELLE REFUND NOW NET ID: 507600C0E61A EPP ID: US25031782826048 Zelle GERARD TARRANT 8006566561	
03/18	500.00	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 507700K0E86B EPP ID: US25031882960712 Zelle FREDERICK MAYNARD G 8006566561	
03/18	315.00	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 507700N095AH EPP ID: US25031882941006 Zelle JEFFREY SIMPSON 8006566561	
03/19	14,012.63	MOBILE DEPOSIT	
03/19	7,500.00	NEXTGEAR FUNDING FUNDING 031825 151812	
03/19	7,000.00	INCOMING WIRE TRANSFER (MTS NO.250319014163)	

Please See Additional Information on Next Page



## Analysis Business Checking for XXXXXX-361-1 Continued

### Deposits & Credits (Continued)

Date	Amount	Description
03/19	2,901.73	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 507800G0KC9D EPP ID: US25031983078465 Zelle JOYCE KLEINBERG 8006566561
03/24	4,000.00	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 508300F0DNUY EPP ID: US25032483609931 Zelle YJ SIMCO LLC 8006566561
03/24	1,000.00	NOW NETWORK CREDIT ZELLE CREDIT NOW NET ID: 508300M015H6 EPP ID: US25032483623727 Zelle YJ SIMCO LLC 8006566561
03/25	3,000.00	NEXTGEAR FUNDING FUNDING 032525 151812
03/25	10,000.00	INCOMING WIRE TRANSFER (MTS NO.250325006257)
03/25	1,000.00	INCOMING WIRE TRANSFER (MTS NO.250325003573)
03/27	9,349.43	NEXTGEAR FUNDING FUNDING 032625 151812
03/27	15,000.00	INCOMING WIRE TRANSFER (MTS NO.250327006451)
03/31	15,000.00	NEXTGEAR FUNDING FUNDING 032825 151812

### Daily Balance

Date	Balance	Date	Balance	Date	Balance	Current Balance	
						=	10,906.58
03/03	17,888.21	03/12	16,644.81	03/21	23,749.49		
03/04	18,575.53	03/13	14,180.28	03/24	19,220.85		
03/05	17,357.07	03/14	11,622.75	03/25	12,068.68		
03/06	12,847.52	03/17	5,095.78	03/26	11,089.55		
03/07	18,212.91	03/18	693.93	03/27	29,424.89		
03/10	22,033.71	03/19	29,825.22	03/28	26,240.13		
03/11	8,503.70	03/20	29,114.97	03/31	10,906.58		





Images for Account XXXXX-361-1

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1137

1640 MOTORS LLC	DATE <u>3/7/25</u>	\$350.00
PAY TO THE ORDER OF <u>Sound Beach Communications</u>		DOLLARS <u>Three Hundred and Fifty -</u>
<u>xx Citizens'</u>		<u>350.00</u>
FOR <u>IT SUPPORT SYSTEMS REPAIR</u>		
#001137# 0021313103# 3611#		

1138

1640 MOTORS LLC	DATE <u>3.10.25</u>	\$525.00
PAY TO THE ORDER OF <u>Kreyman Dier of Furniture Restoration</u>		DOLLARS <u>Five hundred and twenty five -</u>
<u>xx Citizens'</u>		<u>525.00</u>
FOR <u>Management Inc.</u>		
#001138# 0021313103# 3611#		

1137 03/07/2025 \$350.00

1138 03/13/2025 \$525.00

32725

1640 Motors LLC		March 27th 2025
PAY TO THE ORDER OF <u>Hamptons Risk Management</u>		\$4,974.28
Four thousand nine hundred seventy four and 28/100		Dollars
FOR <u>Career Keepers Liability Inc.</u>		Authorized Check Draft No Signature Required
#32725# 0021313103# 3611#		

32725 03/31/2025 \$4,974.28

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## Account Overview

**Account**

Analysis Business Che... \*3611 ▾

**Paperless Settings:** ^

Statements: Not Eligible

Available Balance: -\$585.45

[Transactions](#)    [Account Details](#)    [Account Services](#)

Filter

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April 30, 2025

Intuit *	-\$515.45
Preauthorized Debit	-\$585.45

April 29, 2025

Returned Item ( 2 At \$35 Each )	-\$70.00
Fee	-\$70.00

Optimum 7839 Cable Pmnt	+\$227.80
ACH Debit Reversal	\$0.00

Afco Direct Payments	+\$5,039.88
ACH Debit Reversal	-\$227.80

April 28, 2025

Optimum 7839 Cable Pmnt	-\$227.80
Preauthorized Debit	-\$5,267.68

NYSCEF APQ NO 14500

RECEIVED NYSCEF 05/01/2025

\$5,039.88

-\$5,039.88

Preauthorized Debit

**Water Mill Bui New York Ny 4956** -\$367.74  
DBT Purchase \$0.00

April 25, 2025

**Single Source Holbrook Ny 6382** -\$268.98  
DBT Purchase \$367.74

April 24, 2025

**Nextgear Payment Payment** -\$323.60  
Preauthorized Debit \$636.72

**Nextgear Payment Payment** -\$2,560.82  
Preauthorized Debit \$960.32

**Dda Debit #2358039831** -\$23,624.11  
Withdrawal \$3,521.14

**Amazon.com\*mz1 Seattle Wa 6382** -\$44.52  
POS Debit \$27,145.25

**Amazon.com\*ol4 Seattle Wa 6382** -\$27.16  
POS Debit \$27,189.77

**Shell Service Water Mill Ny 4956** -\$147.21  
POS Debit \$27,216.93

April 23, 2025

**Maggio Environme 6136430** -\$220.77  
Preauthorized Debit \$27,364.14

**Amazon.com\*3s3 Seattle Wa 6382** -\$21.72  
POS Debit \$27,584.91

**Zelle Way To Go Aut 8006566561 Zelle Debit** -\$400.00  
NOW NETWORK DEBIT \$27,606.63

NYSCEF DOC. NO. 1480

RECEIVED NYSCEF: 05/01/2025

**Amazon.com\*ia2 Seattle Wa 6382****-\$17.38**

POS Debit

\$28,006.63

**Mta\*nyct Paygo New York Ny 4956****-\$2.90**

DBT Purchase

\$28,024.01

**American Pie - Bridgehamptonny 4956****-\$38.29**

DBT Purchase

\$28,026.91

**Mta\*nyct Paygo New York Ny 4956****-\$2.90**

DBT Purchase

\$28,065.20

**Mta\*nyct Paygo New York Ny 4956****-\$2.90**

DBT Purchase

\$28,068.10

**Single Source Holbrook Ny 6382****-\$445.79**

DBT Purchase

\$28,071.00

April 22, 2025

**Nextgear Payment Payment****-\$296.99**

Preauthorized Debit

\$28,516.79

**Nextgear Payment Payment****-\$347.48**

Preauthorized Debit

\$28,813.78

**Nextgear Payment Payment****-\$11,462.52**

Preauthorized Debit

\$29,161.26

**Taste Ny Li We Dix Hills Ny 4956****-\$26.39**

POS Debit

\$40,623.78

**Bp#1761709200 Syosset Ny 4956****-\$5.84**

POS Debit

\$40,650.17

**Bp#1761709200 Syosset Ny 4956****-\$44.46**

POS Debit

\$40,656.01

**Shell Oil 5754 Water Mill Ny 4956****-\$32.58**

DBT Purchase

\$40,700.47

Gulf Bridgeham Bridgehampto Ny 4956		-\$40.00
POS Debit		\$40,733.05
Citarella Bridgehamptonny 4956		-\$44.48
POS Debit		\$40,773.05
Sca.auctions North Miami Bfl 4956		-\$1,000.00
DBT Purchase		\$40,817.53
Citarella Bridgehamptonny 4956		-\$145.51
DBT Purchase		\$41,817.53
Amazon Prime*z Amzn.com/billwa 6382		-\$16.30
DBT Purchase		\$41,963.04
Ebay O*09-1297 San Jose Ca 6382		-\$114.19
DBT Purchase		\$41,979.34
Cool Cruisers Rowlett Tx 6382		-\$646.99
DBT Purchase		\$42,093.53
April 18, 2025		
Wire Xfer		-\$3,846.15
Outgoing Wire Transfer		\$42,740.52
Zelle Way To Go Aut 8006566561 Zelle Debit		-\$250.00
NOW NETWORK DEBIT		\$46,586.67
Zelle Yjsimco 8006566561 Zelle Debit		-\$1,000.00
NOW NETWORK DEBIT		\$46,836.67
Zelle Jer Accountin 8006566561 Zelle Debit		-\$750.00
NOW NETWORK DEBIT		\$47,836.67
Zelle Samantha Busiello 8006566561 Zelle Debit		-\$750.00
NOW NETWORK DEBIT		\$48,586.67
Zelle Solloh Boy Truck 8006566561 Zelle Debit		-\$1,250.00

Amazon.com*1e0 Seattle Wa 6382	-\$20.43
POS Debit	\$50,586.67
Zelle Lee Alexander 8006566561 Zelle Credit	+\$923.30
NOW NETWORK CREDIT	\$50,607.10
April 17, 2025	
Nextgear Payment Payment	-\$437.31
Preauthorized Debit	\$49,683.80
Nextgear Payment Payment	-\$708.14
Preauthorized Debit	\$50,121.11
Nextgear Payment Payment	-\$6,081.96
Preauthorized Debit	\$50,829.25
Amazon.com*yj7 Seattle Wa 6382	-\$10.86
POS Debit	\$56,911.21
Single Source Holbrook Ny 6382	-\$446.23
DBT Purchase	\$56,922.07
Water Mill Bui New York Ny 4956	-\$140.59
DBT Purchase	\$57,368.30
Jeff's Bronco 248-437-5060 Mi 6382	-\$167.60
DBT Purchase	\$57,508.89
Shell Oil 5754 Water Mill Ny 4956	-\$50.05
DBT Purchase	\$57,676.49
Wire Xfer	+\$5,000.00
Incoming Wire Transfer	\$57,726.54
Wire Xfer	+\$10,000.00
Incoming Wire Transfer	\$52,726.54
Wire Xfer	+\$16,280.34

<b>Nextgear Funding Funding</b>	<b>+\$7,500.00</b>
Direct Deposit	\$26,446.20

April 16, 2025

<b>Afco Direct Payments</b>	<b>-\$906.00</b>
Preauthorized Debit	\$18,946.20

<b>Citarella Bridgehamptonny 4956</b>	<b>-\$121.39</b>
POS Debit	\$19,852.20

<b>Shell Service Water Mill Ny 4956</b>	<b>-\$8.27</b>
POS Debit	\$19,973.59

<b>Amazon.com*x42 Seattle Wa 6382</b>	<b>-\$10.86</b>
POS Debit	\$19,981.86

<b>Napa Auto Part Bridgehamptonny 6382</b>	<b>-\$85.39</b>
DBT Purchase	\$19,992.72

<b>Water Mill Bui New York Ny 4956</b>	<b>-\$276.05</b>
DBT Purchase	\$20,078.11

April 15, 2025

<b>Vinokur Associat Sale</b>	<b>-\$750.00</b>
Preauthorized Debit	\$20,354.16

<b>Zelle Samantha Busiello 8006566561 Zelle Debit</b>	<b>-\$1,000.00</b>
NOW NETWORK DEBIT	\$21,104.16

<b>Amazon.com*394 Seattle Wa 6382</b>	<b>-\$41.26</b>
POS Debit	\$22,104.16

<b>Citarella Bridgehamptonny 4956</b>	<b>-\$94.93</b>
DBT Purchase	\$22,145.42

<b>Westchester Ai White Plains Ny 4956</b>	<b>-\$104.19</b>
DBT Purchase	\$22,240.35

NYSCEF DOC. NO. 1400  
Jetblue 8005382583 Ny 4956  
DBT Purchase

RECEIVED NYSCEF: 05/01/2025  
-\$394.48  
\$22,344.54

April 14, 2025

<b>Intuit 56940026 Payroll</b>	<b>-\$222.57</b>
Preauthorized Debit	\$22,739.02
<b>Intuit 56940026 Payroll</b>	<b>-\$1,119.39</b>
Preauthorized Debit	\$22,961.59
<b>Intuit 56940026 Payroll</b>	<b>-\$1,161.16</b>
Preauthorized Debit	\$24,080.98
<b>Intuit 56940026 Payroll</b>	<b>-\$1,313.97</b>
Preauthorized Debit	\$25,242.14
<b>Intuit 56940026 Payroll</b>	<b>-\$1,347.65</b>
Preauthorized Debit	\$26,556.11
<b>Nextgear Payment Payment</b>	<b>-\$1,399.39</b>
Preauthorized Debit	\$27,903.76
<b>Intuit 56940026 Payroll</b>	<b>-\$1,566.83</b>
Preauthorized Debit	\$29,303.15
<b>Intuit 56940026 Payroll</b>	<b>-\$1,887.20</b>
Preauthorized Debit	\$30,869.98
<b>Zelle Luis P Vera 8006566561 Zelle Debit</b>	<b>-\$120.00</b>
NOW NETWORK DEBIT	\$32,757.18
<b>Wire Xfer</b>	<b>-\$3,846.15</b>
Outgoing Wire Transfer	\$32,877.18
<b>Cumberland Farms 1manorville Ny 4956</b>	<b>-\$13.45</b>
POS Debit	\$36,723.33
<b>Cumberland Farms 1manorville Ny 4956</b>	<b>-\$25.07</b>
POS Debit	\$36,736.78

NYSCEF DOC NO 1480  
Taste My Li We Dix Hills Ny 4956RECEIVED NYSCEF: 05/01/2025  
-\$1.63

POS Debit

\$36,761.85

**Pbi Coral Cove West Palm Beach 4956** -\$11.47  
 DBT Purchase \$36,763.48

**Uber Trip\* Tri San Franciscoca 4956** -\$25.00  
 POS Debit \$36,774.95

**Rovers North Westford Vt 4956** +\$597.30  
 DBT Return \$36,799.95

April 11, 2025

**Exchange Fee** -\$14.94  
 Foreign ATM or POS Fee \$36,202.65

**Emergency Card Fee 04/11** -\$12.00  
 Service Charge \$36,217.59

**Ezpass8882886865 Payment** -\$25.00  
 Preauthorized Debit \$36,229.59

**Nextgear Payment Payment** -\$95.00  
 Preauthorized Debit \$36,254.59

**Nyc Finance Parking Tk** -\$95.00  
 Preauthorized Debit \$36,349.59

**Lipa Online Pay** -\$1,367.59  
 Preauthorized Debit \$36,444.59

**Lipa Online Pay** -\$2,052.03  
 Preauthorized Debit \$37,812.18

**Zelle Jer Accountin 8006566561 Zelle Debit** -\$750.00  
 NOW NETWORK DEBIT \$39,864.21

**Shell Service Scarsdale Ny 4956** -\$15.27  
 POS Debit \$40,614.21

NYSCEF DOC NO. 1440  
East Hills Ent Roslyn Heightny 4956RECEIVED NYSCEF: -04/30/2025  
-\$14.10

POS Debit

\$40,629.48

**East Hills Ent Roslyn Heightny 4956** -\$15.00  
 POS Debit \$40,640.58

**Zelle Krystral Conley 8006566561 Zelle Debit** -\$1,500.00  
 NOW NETWORK DEBIT \$40,655.58

**Citarella Bridgehamptonny 4956** -\$75.98  
 DBT Purchase \$42,155.58

**Nb Rim Repair Bay Shore Ny 4956** -\$1,400.00  
 DBT Purchase \$42,231.56

**Sq \*Futuronet Wroxton 4956** -\$498.17  
 DBT Purchase \$43,631.56

**Wire Xfer** +\$4,000.00  
 Incoming Wire Transfer \$44,129.73

April 10, 2025

**Nextgear Payment Payment** -\$324.57  
 Preauthorized Debit \$40,129.73

**Nextgear Payment Payment** -\$472.09  
 Preauthorized Debit \$40,454.30

**Amex Epayment Ach Pmt** -\$1,000.00  
 Preauthorized Debit \$40,926.39

**Nextgear Payment Payment** -\$1,298.26  
 Preauthorized Debit \$41,926.39

**Wire Xfer** +\$5,000.00  
 Incoming Wire Transfer \$43,224.65

April 9, 2025

**Shelterpoint D741238** -\$1,736.81  
 Preauthorized Debit \$38,224.65

Zelle Heidi Rodrigues 8006566561 Zelle Debit	-\$1,500.00
NOW NETWORK DEBIT	\$39,961.46

Citarella Bridgehamptonny 4956	-\$75.47
DBT Purchase	\$41,461.46

April 8, 2025

Nextgear Payment Payment	-\$910.45
Preauthorized Debit	\$41,536.93

Wire Xfer	-\$15,000.00
Outgoing Wire Transfer	\$42,447.38

Sabrosa Mexica Water Mill Ny 4956	-\$24.93
DBT Purchase	\$57,447.38

Citarella Bridgehamptonny 4956	-\$53.25
DBT Purchase	\$57,472.31

April 7, 2025

Ebay Comgjyfgg1z Payments	-\$21.95
Preauthorized Debit	\$57,525.56

Nyc Finance Parking Tk	-\$335.92
Preauthorized Debit	\$57,547.51

Intuit 56396156 Payroll	-\$363.99
Preauthorized Debit	\$57,883.43

Nextgear Payment Payment	-\$568.07
Preauthorized Debit	\$58,247.42

Nextgear Payment Payment	-\$912.79
Preauthorized Debit	\$58,815.49

Intuit 56396156 Payroll	-\$1,060.48
Preauthorized Debit	\$59,728.28

Intuit 56396156 Payroll	-\$1,101.64
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NYSCEF PROOFED 05/01/2025 11:08 AM

RECEIVED NYSCEF 05/01/2025

<b>Intuit 56396156 Payroll</b>	<b>-\$1,301.10</b>
Preauthorized Debit	\$61,890.40
<b>Intuit 56396156 Payroll</b>	<b>-\$1,324.14</b>
Preauthorized Debit	\$63,191.50
<b>Intuit 56396156 Payroll</b>	<b>-\$1,341.01</b>
Preauthorized Debit	\$64,515.64
<b>Nextgear Payment Payment</b>	<b>-\$2,103.96</b>
Preauthorized Debit	\$65,856.65
<b>Intuit 56396156 Payroll</b>	<b>-\$2,188.87</b>
Preauthorized Debit	\$67,960.61
<b>Zelle Melissa Shulman 8006566561 Zelle Debit</b>	<b>-\$305.10</b>
NOW NETWORK DEBIT	\$70,149.48
<b>Zelle Luis P Vera 8006566561 Zelle Debit</b>	<b>-\$120.00</b>
NOW NETWORK DEBIT	\$70,454.58
<b>Zelle Jer Accountin 8006566561 Zelle Debit</b>	<b>-\$750.00</b>
NOW NETWORK DEBIT	\$70,574.58
<b>Gulf Bridgeham Bridgehampto Ny 4956</b>	<b>-\$19.04</b>
POS Debit	\$71,324.58
<b>Gulf Bridgeham Bridgehampto Ny 4956</b>	<b>-\$35.05</b>
POS Debit	\$71,343.62
<b>Plainview Roun Plainview Ny 4956</b>	<b>-\$40.01</b>
POS Debit	\$71,378.67
<b>Citarella Bridgehamptonny 4956</b>	<b>-\$32.37</b>
DBT Purchase	\$71,418.68
<b>E-z*passny Tol 800-333-8655 Ny 3858</b>	<b>-\$346.45</b>
DBT Purchase	\$71,451.05

NYSCEF DOC. NO. 1480

RECEIVED NYSCEF: 05/01/2025

Afco Corp Pay	+\$4,974.28
Direct Deposit	\$71,797.50

Mobile Deposit	+\$14,257.03
Deposit   <a href="#">View</a>	\$66,823.22

April 4, 2025

Nextgear Payment Payment	-\$845.70
Prauthorized Debit	\$52,566.19

All American M Hauppauge Ny 4956	-\$9.70
POS Debit	\$53,411.89

Wire Xfer	-\$3,846.00
Outgoing Wire Transfer	\$53,421.59

Ebay O*14-1290 San Jose Ca 3858	-\$43.48
DBT Purchase	\$57,267.59

Shell Oil 5754 Water Mill Ny 3858	-\$34.31
DBT Purchase	\$57,311.07

Atlantic Briti Clifton Park Ny 3858	-\$67.45
DBT Purchase	\$57,345.38

Fedex486375123 Memphis Tn 3858	-\$52.37
DBT Purchase	\$57,412.83

Wire Xfer	+\$5,994.83
Incoming Wire Transfer	\$57,465.20

Wire Xfer	+\$30,000.00
Incoming Wire Transfer	\$51,470.37

Shopmonkey Settlement	+\$2,412.20
Direct Deposit	\$21,470.37

Nextgear Funding Funding	+\$17,140.62
Direct Deposit	\$19,058.17

Optimum 7839 Cable Pmnt		-\$419.94
Preauthorized Debit		\$1,917.55
Wire Xfer		-\$14,500.00
Outgoing Wire Transfer		\$2,337.49
Shell Service Water Mill Ny 4956		-\$14.15
POS Debit		\$16,837.49
Shell Service Water Mill Ny 4956		-\$20.01
POS Debit		\$16,851.64
Zelle Gabriella Barr 8006566561 Zelle Debit		-\$147.62
NOW NETWORK DEBIT		\$16,871.65
In *Vinokur As 646-9122791 Nj 3858		-\$750.00
DBT Purchase		\$17,019.27
Citarella Bridgehamptonny 4956		-\$77.00
DBT Purchase		\$17,769.27
Single Source Holbrook Ny 3858		-\$144.84
DBT Purchase		\$17,846.27
Amazon Prime*k Amzn.com/billwa 3858		-\$16.30
DBT Purchase		\$17,991.11
Airweld Inc Pa Patchogue Ny 3858		-\$428.01
DBT Purchase		\$18,007.41
Zelle Jeffrey Simpson 8006566561 Zelle Credit		+\$250.00
NOW NETWORK CREDIT		\$18,435.42
Zelle Lee Alexander 8006566561 Zelle Credit		+\$1,194.88
NOW NETWORK CREDIT		\$18,185.42
Wire Xfer		+\$7,500.00
Incoming Wire Transfer		\$16,990.54

<b>Exchange Fee</b>	-\$2.36
Foreign ATM or POS Fee	\$9,490.54

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<b>Maggio Environme 6113304</b>	-\$220.77
Preauthorized Debit	\$9,492.90

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<b>Amazon.com*td7 Seattle Wa 3858</b>	-\$358.80
POS Debit	\$9,713.67

---

<b>Ebay O*15-1289 Luxembourg 3858</b>	-\$84.59
DBT Purchase	\$10,072.47

---

<b>Moss Motors 800-667-7872 Ca 3858</b>	-\$75.25
DBT Purchase	\$10,157.06

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<b>Moss Motors 800-667-7872 Ca 3858</b>	-\$47.35
DBT Purchase	\$10,232.31

April 1, 2025

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<b>Atm Fee</b>	-\$3.00
Foreign ATM or POS Fee	\$10,279.66

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<b>Amazon.com*wf2 Seattle Wa 3858</b>	-\$11.94
POS Debit	\$10,282.66

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<b>2102 Montauk Hwy Bridgehamptonny 4956</b>	-\$103.50
ATM Cash	\$10,294.60

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<b>Citarella Bridgehamptonny 4956</b>	-\$59.11
POS Debit	\$10,398.10

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<b>Sabrosa Mexica Water Mill Ny 4956</b>	-\$24.93
DBT Purchase	\$10,457.21

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<b>Tr Wholesale S 574-287-2316 In 3858</b>	-\$424.44
DBT Purchase	\$10,482.14

March 31, 2025

NYSCEF DOC. NO. 1480

RECEIVED NYSCEF: 05/01/2025

Foreign ATM or POS Fee

\$10,906.58

Intuit 55107977 Payroll		-\$240.70
Preauthorized Debit		\$10,908.06
Intuit * Qbooks Liv		-\$505.66
Preauthorized Debit		\$11,148.76
Nextgear Payment Payment		-\$579.58
Preauthorized Debit		\$11,654.42
Intuit 55107977 Payroll		-\$1,046.44
Preauthorized Debit		\$12,234.00
Intuit 23924292 Tax		-\$1,081.09
Preauthorized Debit		\$13,280.44
Intuit 55107977 Payroll		-\$1,181.00
Preauthorized Debit		\$14,361.53
Intuit 55107977 Payroll		-\$1,204.22
Preauthorized Debit		\$15,542.53
Intuit 55107977 Payroll		-\$1,231.57
Preauthorized Debit		\$16,746.75
Intuit 55107977 Payroll		-\$1,384.50
Preauthorized Debit		\$17,978.32
Nextgear Payment Payment		-\$1,574.31
Preauthorized Debit		\$19,362.82
Intuit 55107977 Payroll		-\$1,779.74
Preauthorized Debit		\$20,937.13
Irs Usataxpymt		-\$2,014.48
Preauthorized Debit		\$22,716.87
Irs Usataxpymt		-\$2,032.80

Check #32725		-\$4,974.28
Check   <a href="#">View</a>		\$26,764.15
Afco Direct Payments		-\$4,974.28
Prauthorized Debit		\$31,738.43
Zelle Luis P Vera 8006566561 Zelle Debit		-\$120.00
NOW NETWORK DEBIT		\$36,712.71
Wire Xfer		-\$3,500.00
Outgoing Wire Transfer		\$36,832.71
Citarella Bridgehamptonny 4956		-\$85.10
DBT Purchase		\$40,332.71
Shinnecock Har Southampton Ny 4956		-\$378.15
DBT Purchase		\$40,417.81
Shell Oil 5754 Water Mill Ny 4956		-\$13.27
DBT Purchase		\$40,795.96
Ebay O*14-1288 London 3858		-\$52.90
DBT Purchase		\$40,809.23
Lseat.com Sugar Land Tx 3858		-\$378.00
DBT Purchase		\$40,862.13
Nextgear Funding Funding		+\$15,000.00
Direct Deposit		\$41,240.13
March 28, 2025		
Zelle Jer Accountin 8006566561 Zelle Debit		-\$750.00
NOW NETWORK DEBIT		\$26,240.13
Zelle Samantha Busiello 8006566561 Zelle Debit		-\$1,400.00
NOW NETWORK DEBIT		\$26,990.13
Zelle David Simpson 8006566561 Zelle Debit		-\$290.00

Speedway Watermill Ny 4956	-\$67.26
POS Debit	\$28,680.13

Citarella Bridgehamptonny 4956	-\$85.93
DBT Purchase	\$28,747.39

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

-----X  
JEFFREY SIMPSON, individually and derivatively,  
as managing member of JJ ARCH LLC,  
suing derivatively as managing member of  
ARCH REAL ESTATE HOLDINGS LLC,  
and JJ ARCH LLC,

*Plaintiffs*

Index No. 158055/2023

-against-

Justice Joel M. Cohen

JARED CHASSEN and FIRST REPUBLIC BANK,

Mot. Seq. No. 24

*Defendants*

-----X  
JARED CHASSEN, individually and derivatively  
on behalf of JJ ARCH LLC, as member,  
and derivatively on behalf of  
ARCH REAL ESTATE HOLDINGS LLC,  
as member of JJ ARCH LLC,

*Counterclaim Plaintiff*

-against-

JEFFREY SIMPSON and YJ SIMCO LLC,

*Counterclaim Defendants*

-and-

JJ ARCH LLC and  
ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendants*

-----X  
608941 NJ, INC.

*Plaintiff*

-against-

JEFFREY SIMPSON, JJ ARCH LLC and ARCH REAL  
ESTATE HOLDINGS LLC,

*Defendants,*

-and-

ARCH REAL ESTATE HOLDINGS LLC,

*Nominal Defendant*

-----x

**SUPPLEMENTAL AFFIRMATION OF ALLEN SCHWARTZ, ESQ. IN SUPPORT OF  
ORDER TO SHOW CAUSE**

Allen Schwartz, an attorney duly admitted to practice law before the Courts of this state, being duly deposed, affirms under penalty of perjury pursuant to CPLR 2106 as follows:

1. I am counsel to Jared Chassen in this action. I submit this supplemental affirmation in support of Chassen's Order to Show Cause (Mot. Seq. No. 24) (the "Contempt Motion").
2. After Chassen filed the Contempt Motion today (NYSCEF Nos. 1450-1462), the Court appointed Receiver, Mr. Eric Huebscher, filed on NYSCEF a supplemental affirmation in support of the Receiver's Motion (NYSCEF No. 1435-1448, Mot. Seq. No. 23) which provides additional evidence of Mr. Simpson's ongoing defiance of the Court's Receiver Orders and provides further support for the Contempt Motion. The submission attaches two further police reports evidencing Simpson's defiance of the Receiver Orders, Simpson's destruction of an alarm installed by the Receiver at a JJ Arch property, Simpson's ongoing sales of JJ Arch assets, and evidence that Simpson has opened undisclosed JJ Arch bank accounts. The Receiver's testimony and the attached exhibits, available at NYSCEF Nos. 1463-1468, are annexed hereto as **Exhibit 1**.

I affirm this 30th day of April, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

By: \_\_\_\_\_/s/  
Allen Schwartz

**WORD COUNT CERTIFICATION**

Allen Schwartz hereby certifies that the annexed document contains fewer than 7000 words exclusive of the table of contents, signature block and caption and that I relied on Microsoft Word to ascertain the word count. Movant has requested permission herewith to submit this affirmation above the 7000 word-limit.

By: /s/  
Allen Schwartz

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION PART 03M  
-----X

JEFFREY SIMPSON, INDIVIDUALLY AND  
DERIVATIVELY, AS MANAGING MEMBER OF JJ  
ARCH LLC, SUING DERIVATIVELY AS MANAGING  
MEMBER OF ARCH REAL ESTATE HOLDINGS LLC,  
JJ ARCH LLC,

Index No. 158055/2023

Mot. Seq. 23

Hon. Joel M. Cohen

Plaintiff,

-v-

JARED CHASSEN, FIRST REPUBLIC BANK, YJ  
SIMCO LLC, ARCH REAL ESTATE HOLDINGS LLC,

Defendants.

-----X

**SUPPLEMENTAL AFFIRMATION OF ERIC M. HUEBSCHER, IN HIS CAPACITY AS  
RECEIVER, IN SUPPORT OF RECEIVER'S MOTION FOR AN ORDER  
COMPELLING JEFFREY SIMPSON TO COMPLY WITH RECEIVERSHIP ORDER  
AND DIRECTING SHERIFF TO ENFORCE RECEIVERSHIP ORDER**

I, Eric M. Huebscher, not individually but solely in my capacity as court appointed receiver (the “Receiver”), affirm the following under penalty of perjury pursuant to [CPLR §2106](#):

1. I submit this supplemental affirmation in support of my motion, brought by order to show cause, seeking an order (i) compelling Simpson<sup>1</sup> to comply with the Receivership Order, to address Simpson’s willful and continuous refusal to comply with its terms; (ii) directing the Civil Enforcement Bureau of the Suffolk County Sheriff’s Office and the Sheriff of any other county in which a JJ Arch Controlled Property is located to enforce the Receivership Order; and (iii) granting such other and further relief this Court deems just and proper.

2. Since the filing of my Moving Affirmation, additional details have come to light that pertain to the Motion and the relief I seek therein.

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in my moving affirmation, dated April 29, 2025 ([NYSCEF Doc. No. 1436](#)) (“Moving Affirmation”).

**Recent Sales by Rêver Motors**

3. I have discovered that Simpson is, upon information and belief, which belief is based upon posts made from the Instagram account of the Rêver Motors business, continuing to conduct the business of Rêver Motors and has sold various assets of the business over the past seven days.

4. The first Instagram post, a copy of which is annexed hereto as **Exhibit A**, indicates that it was posted on the Rêver Motors account one week ago today (April 23, 2025). The post is advertising a “Live Auction” for, among other things, a “1951 Matchless G80 w/Swallow Jet 89 Sidecar”; “7 days left to make it yours – link in bio to bid.” ([https://www.instagram.com/p/DIt8vwJpfWZ/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/DIt8vwJpfWZ/?utm_source=ig_web_copy_link)).

5. The second Instagram post, a copy of which is annexed hereto as **Exhibit B**, indicates that it was posted on the Rêver Motors account three days ago (April 27, 2025). The post states: “We are so excited to wrap up this Arless blue defender this week and deliver it to its new owner...We have one more defender 90 V8 automatic with a soft top and ready to go for the season.” ([https://www.instagram.com/p/DI8klrUOIH8/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/DI8klrUOIH8/?utm_source=ig_web_copy_link)).

6. The third Instagram post, a copy of which is annexed hereto as **Exhibit C**, indicates that it was posted on the Rêver Motors account one day ago (April 30, 2025). The post states: “SOLD! This stunning 1953 Matchless G80 has officially found a new home!...” ([https://www.instagram.com/p/DJCAQ-NRt51/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/DJCAQ-NRt51/?utm_source=ig_web_copy_link)).

7. And, these are just the sales that have been publicized on the Rêver Motors Instagram account. Simpson must be held to account for these and any other sales from the Rêver Motors business that have taken place since I duly qualified as Receiver, turn over all documents

pertaining to the Rêver Motors business, including those related to the sales, turn over all sale proceeds, and relinquish control of the Rêver Motors Instagram account.

8. Moreover, and of grave concern, I was of the belief that I had taken control of the only two accounts from which Rêver Motors was transacting business. In light of these newly discovered sales, it is apparent that Simpson is utilizing a separate account(s) to transact business on behalf of Rêver Motors. Accordingly, Simpson must be directed to immediately identify any and all accounts associated with the JJ Arch Controlled Entities and the JJ Arch Controlled Properties, including the Rêver Motors business, and relinquish control of said accounts.

#### **Southampton Town Police Department Incident Reports**

9. Today I received from the Southampton Town Police Department Incident Reports corroborating some of the events I described in my Moving Affirmation relating to the 225 Head of Pond property, and with which the Southampton Police were involved.

10. The first Incident Report, a copy of which is annexed hereto as **Exhibit D**, details a report made on April 14, 2025. As Simpson alluded to in his e-mail from April 14, 2025,<sup>2</sup> the Southampton PD responded to Simpson's complaint and arrived at the 225 Head of Pond property at approximately 2:11 p.m. Simpson reported to the authorities that he:

owns and operates said companies [225 HPR, LLC], and is in dispute with the court appointed Receiver, Eric Huebscher, who he claims was at the property and ordering the placing of for sale signs at this location. Mr. Simpson further asserts that he is in full control of his assets [sic] and is in Federal Court over the matter, and that no one has rights or privileges to exercise control thereof until such matter is resolved through the civil court process...

11. It was around this time, April 14, that Simpson either changed or damaged the 225 Head of Pond Road property's front door lock. *See* Moving Affirmation, ¶ 27. As noted in the

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<sup>2</sup> See Moving Affirmation, Ex. F ([NYSCEF Doc. No. 1442](#)); see also Moving Affirmation, ¶ 28.

Incident Report, the Southampton Police marked this matter as “Closed/cleared”, deeming the “incident...to be a civil matter. No further police action is required at this time.” Ex. D at p. 1.

12. As stated in my Moving Affirmation, on April 22, 2025, I returned to the 225 Head of Pond Road property to change the lock again and install an alarm system that notifies the Southampton Police when activated. *See* Moving Affirmation, ¶ 29.

13. The second Incident Report, a copy of which is annexed hereto as **Exhibit E**, detailing a report made on April 25, 2025, stems from the alarm being activated and the Southampton Police’s response thereto. *See* Moving Affirmation, ¶ 30.

14. Simpson was present when the police arrived at the 225 Head of Pond Road property and, in the presence of the responding officers, “Simpson destroyed and removed an alarm system from within the residence that he believes was put in place by Mr. [Huebscher] without Simpson’s permission or authority to do so.” Ex. E at p. 1. Again, the Incident Report describes the status of this incident as “Closed/cleared”. *Id.*

15. The alarm system that I had installed at the 225 Head of Pond Road property, and which Simpson destroyed, cost almost \$1,200.

16. I respectfully request that the Court enter an order:

(i) directing Simpson to:

(a) comply with the Receivership Order in all respects; (b) not, directly or indirectly (A) enter onto any of the JJ Arch Controlled Properties, including but not limited to 1640 Montauk Highway and 225 Head of Pond Road; (B) transact any business of Rêver Motors or any of the other JJ Arch Controlled Entities and/or JJ Arch Controlled Properties; and (C) do any act or refrain from any act whatsoever to interfere with the Receiver’s taking custody, control, possession, or managing of the assets or documents subject to the Receivership; or to harass or to interfere with the Receiver in any way; or to communicate with the Receiver in any manner in violation of the Receivership Order; or to refuse to cooperate with the Receiver or the Receiver’s duly authorized agents in the exercise of their duties or authority under any Order of this Court; (c) account for all sales from the Rêver Motors business that have taken place since I duly qualified as Receiver; turn over all documents pertaining to the Rêver Motors business, including those related to all such

sales; turn over all such sale proceeds; and relinquish control of the Rêver Motors Instagram account; and (d) immediately identify any and all accounts associated with the JJ Arch Controlled Entities and the JJ Arch Controlled Properties, including the Rêver Motors business, and relinquish control of said accounts;

(ii) authorizing and directing the Civil Enforcement Bureau of the Suffolk County Sheriff's Office to: (a) place the Receiver in possession of the real property located at 1640 Montauk Highway; (b) place the Receiver in possession of the business premises of Rêver Motors located at 1640 Montauk Highway; (c) remove Simpson from 1640 Montauk Highway and the business premises of Rêver Motors; (d) prevent Simpson's entry onto 1640 Montauk Highway and the business premises of Rêver Motors; (e) place the Receiver in possession of the real property and the house located at 225 Head of Pond Road; (f) remove Simpson from 225 Head of Pond Road; and (g) prevent Simpson's entry onto 225 Head of Pond Road;

(iii) authorizing and directing the Sheriff of any other county in which a JJ Arch Controlled Property is located, upon the request of the Receiver, to: (a) place the Receiver in possession of the JJ Arch Controlled Property; (b) remove Simpson from the JJ Arch Controlled Property; and (c) prevent Simpson's entry onto the JJ Arch Controlled Property;

(iv) compelling Simpson to immediately turn over the Books and Records to the Receiver; and

(v) granting such other and further relief this Court deems just and proper.

I affirm this 30th day of April, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: April 30, 2025

/s/ Eric M. Huebscher  
Eric M. Huebscher

**CERTIFICATION OF COUNSEL**

This Affirmation was prepared by computer using Microsoft Word. The total number of words in the document, excluding the caption and the signature block, is 1,506. This certification complies with Rule 17 of the Commercial Division Rules.

/s/ Martin G. Bunin

Martin G. Bunin

## **Exhibit A**

### **Instagram post from Rêver Motors**

[https://www.instagram.com/p/DIt8vwJpfWZ/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/DIt8vwJpfWZ/?utm_source=ig_web_copy_link)

[The subsequent pages are provided for illustrative purposes only.]

Instagram

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Suffolk County, New York

...

rmhamptons On Bring a Trailer now: A 1951 Matchless G80 w/Swallow Jet 80 Sidecar  
This vintage British beauty is ready to turn heads and spark stories. Powered by a 497cc single and paired with a Swallow Jet 80 sidecar, it's a rare, no-reserve time capsule of post-war motorcycle design. 7 days left to make it yours — link in bio to bid.

#ReverMotors #MatchlessG80  
#SwallowSidecar #BringATrailer  
#carspotter #carspotting #motoauction  
#VintageMotorcycle #NoReserve  
#ClassicMoto



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## Sidecar

This vintage British beauty is ready to turn heads and spark stories. Powered by a 497cc single and paired with a Swallow Jet 80 sidecar, it's a rare, no-reserve time capsule of post-war motorcycle design. 7 days left to make it yours — link in bio to bid.

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#ReverMotors #MatchlessG80  
#SwallowSidecar #BringATrailer  
#carspotter #carspotting #motoauction  
#VintageMotorcycle #NoReserve  
#ClassicMoto

1w



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April 21

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## **Exhibit B**

### **Instagram post from Rêver Motors**

[https://www.instagram.com/p/DI8klrUOlH8/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/DI8klrUOlH8/?utm_source=ig_web_copy_link)

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...

rmhamptons We are so excited to wrap up this Arless blue defender this week and deliver it to its new owner. We love nostalgic twists, the grill, the light bezels, etc. We have one more defender 90 V8 automatic with a soft top and ready to go for the season

3d



27 likes

3 days ago

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What are the differences between classic, antique and vintage cars?



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## **Exhibit C**

### **Instagram post from Rêver Motors**

[https://www.instagram.com/p/DJCAQ-NRt51/?utm\\_source=ig\\_web\\_copy\\_link](https://www.instagram.com/p/DJCAQ-NRt51/?utm_source=ig_web_copy_link)

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Water Mill, New York

...

rmhamptons SOLD! This stunning 1953 Matchless G80 has officially found a new home! We're always a little sad to see a beauty like this ride off into the sunset — but thrilled it's going to someone who appreciates timeless style and classic British engineering. More vintage gems coming soon... stay tuned!



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What are the differences  
between classic, antique  
and vintage cars?



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Instagram



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Water Mill, New York

...

who appreciates timeless style and  
classic British engineering. More vintage  
gems coming soon... stay tuned!

#ReverMotors #MatchlessG80  
#SoldOnBringATrailer  
#vintagemotorcyclelove

1d



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## **Exhibit D**

## Southampton Town Police Department

ACCREDITED LAW ENFORCEMENT AGENCY



As of Fri Apr 25 15:32:57 EDT 2025

## Incident Report

CC# ST25015209	Pct STPD	Sector C42	Car STC43	Incident Type DISP CIVIL	Classification Body worn camera video - Yes; In car video - No; Shooting incident - No; Incident GEF
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## INCIDENT

Report Date 04/14/2025	Report Time 14:11	Report Day Mon	Date (Occurred on/from) 04/14/2025	Time 14:11	Day Mon	Date (Occurred to)	Time
Business name and type --							Town Code T/SOUTHAMPTON - 525B

Incident address  
225 HEAD OF POND RD, WATER MILL, New York, 11976

## ASSOCIATED PERSONS

Person Type: C=Complainant V=Victim E=Aided A=Arrested S=Suspect M=Missing Person W=Witness P=Person Interviewed O=Other

Per 1	Type C	Name JEFFREY S SIMPSON	D.O.B.	Sex	Race		Offense	
Address						Home Tel #	Work Tel #	Cell Tel #
Per 2	Type O	Name ERIC HUEBSCHER	D.O.B.	Sex	Race		Offense	
Address						Home Tel #	Work Tel #	Cell Tel #

Per 3	Type O	Name JJ ARCH COMPANIES LLC	D.O.B.	Sex	Race		Offense	
Address						Home Tel #	Work Tel #	Cell Tel #

## NARRATIVE

On 04/14/25, reporting officer responded to the above incident location for a report of an ongoing civil dispute regarding real property and assets. Upon investigation, person interviewed was identified as the managing member of JJ Arch Companies, LLC which is reported to be the owner of 225 HPR, LLC, located at 225 Head of pond road, Watermill, NY. According to the complainant, Mr. Simpson, owns and operates said companies, and is in dispute with the court appointed Receiver, Eric Huebscher, who he claims was at the property and ordering the placing of for sale signs at this location. Mr. Simpson further asserts that he is in full control of his assets and is in Federal Court over the matter, and that no one has rights or privileges to exercise control thereof until such matter is resolved through the civil court process. US District Court Case Number 1:25-cv-02372 (LTS). NY Supreme Court Case # 158055-2023.Upon further investigation, reporting officer contacted Mr. Eric Huebscher, who stated that Mr. Simpson is in a contentious legal battle over bankruptcy and has no legal rights or authority over said properties or assets as they are being liquidated at this time. Mr. Huebscher provided sufficient evidence via email showing that he is in fact the NY State Supreme Court appointed Receiver, having full control, and authority vested in him by the court to execute all rights and privileges therein over said properties owned and operated by JJ Arch Companies, LLC including, but not limited to 225 Head of Pond Road, Watermill, N.Y. and over Rever Motors LLC, 550 Montauk Highway, Watermill, N.Y. So order by the honorable, JOEL M. COHEN, J.S.C. NYS Supreme Court. Based upon the totality of the circumstances, the incident is deemed to be a civil matter. No further police action is required at this time. End of report.

Victim did receive information on Victim's Rights and Services pursuant to NYS Law

 Yes  No

## OFFICERS

Name GIAMBONE, JOHN	Rank Police Officer	Badge # PO/1207	Classification Reporting officer; Responding officer; Dispatched officer
Name SOUTHAMPTON PATROL	Rank	Badge #	Classification Reporting unit

## ADMINISTRATIVE

Teletype No	Connected CC #'s
Status Closed/cleared	Status Date 04/14/2025

CC# ST25015209	Reporting / Investigating Officer PO/1207 GIAMBONE, JOHN	Supervisor
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## **Exhibit E**



## Southampton Town Police Department

ACCREDITED LAW ENFORCEMENT AGENCY



As of Fri Apr 25 15:33:58 EDT 2025

## Incident Report

CC# ST25016936	Pct STPD	Sector C42	Car STC42	Incident Type DISP CIVIL	Classification Body worn camera video - Yes; In car video - No; Shooting incident - No; Incident GEF
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## INCIDENT

Report Date 04/25/2025	Report Time 07:37	Report Day Fri	Date (Occurred on/from) 04/25/2025	Time 07:37	Day Fri	Date (Occurred to)	Time
Business name and type --							Town Code T/SOUTHAMPTON - 5258

Incident address  
225 HEAD OF POND RD, WATER MILL, New York, 11976

## ASSOCIATED PERSONS

Person Type: C=Complainant V=Victim E=Aided A=Arrested S=Suspect M=Missing Person W=Witness P=Person Interviewed O=Other

Per 1	Type C	Name ERIC HUEBSCHER	D.O.B.	Sex	Race		Offense	
Address						Home Tel #	Work Tel #	Cell Tel #
Per 2	Type P	Name JEFFREY S SIMPSON	D.O.B.	Sex	Race		Offense	
Address						Home Tel #	Work Tel #	Cell Tel #

## VEHICLES

Veh 1	Status		License Plate No.	State	Exp Yr.	Value	Damage Value
Make	Model	Style		VIN			Veh. Year
Color(s)	Insurance Carrier XXX	Vehicle Notes					

## NARRATIVE

Mr. Simpson advises he is the managing member of the LLC that owns the property at incident location and he has been involved in an ongoing civil dispute with Mr. Huebscher. Simpson destroyed and removed an alarm system from within the residence that he believes was put in place by Mr. Heugh without Simpson's permission or authority to do so. Mr. Huebscher interviewed via PD phone advising that this is an ongoing civil issue and he will be returning to court on Monday to secure further remedy. Statement secured from Simpson, Sgt. Peters/Sgt. Coleman notified.

Victim did receive information on Victim's Rights and Services pursuant to NYS Law  Yes  No

## OFFICERS

Name TURNER, COURTNEY	Rank Police Officer	Badge # PO/1287	Classification Reporting officer; Dispatched officer
Name SOUTHAMPTON PATROL	Rank	Badge #	Classification Reporting unit

## ADMINISTRATIVE

Teletype No	Connected CC #'s		
Status Closed/cleared		Status Date 04/25/2025	Confidential <input type="checkbox"/>

CC# ST25016936	Reporting / Investigating Officer PO/1287 TURNER, COURTNEY	Supervisor
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