

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 20-CIV-81205-RAR

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a/ PAR FUNDING,
FULL SPECTRUM PROCESSING, INC.,
ABETTERFINANCIALPLAN.COM LLC,
d/b/a/ A BETTER FINANCIAL PLAN,
ABFP MANAGEMENT COMPANY, LLC,
f/k/a/ PILLAR LIFE SETTLEMENT
MANAGEMENT COMPANY, LLC,
ABFP INCOME FUND 1, LLC,
ABFP INCOME FUND 2, L.P.,
UNITED FIDELIS GROUP CORP.,
RETIREMENT EVOLUTION GROUP, LLC,
RETIREMENT EVOLUTION INCOME
FUND, LLC, f/k/a/ RE INCOME FUND, LLC,
RE INCOME FUND 2, LLC,
LISA MCELHONE,
JOSEPH COLE BARLETA, a/k/a/ JOE COLE,
JOSEPH W. LAFORTE, a/k/a/ JOE MACK,
a/k/a/ JOE MACKI, a/k/a/ JOE MCELHONE,
PERRY S. ABBONIZIO,
DEAN J. VAGNOZZI,
MICHAEL C. FURMAN,
and JOHN GISSAS,

Defendants, and

L.M.E. 2017 FAMILY TRUST,

Relief Defendant.

NOTICE OF APPEAL

Notice is hereby given that Relief Defendant L.M.E. 2017 Family Trust and Defendants Joseph LaForte and Lisa McElhone in the above captioned-case, hereby appeal to the United States

Court of Appeals for the Eleventh Circuit from the Order Granting Motion To Expand Receivership Estate (Dist. Ct. ECF No. 436) entered in this action on December 16, 2020.

Dated: Port Washington, New York
January 13, 2021

s/ James R. Froccaro, Jr.
JAMES R. FROCCARO, JR. (*PRO HAC*)
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Dated: Fort Lauderdale, Florida
January 13, 2021

s/ David Lawrence Ferguson
DAVID LAWRENCE FERGUSON
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*Attorneys for Defendants L.M.E. 2017 Family
Trust, Joseph LaForte and Lisa McElhone*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 13, 2021, I caused the foregoing document to be delivered to the Clerk of Court and served upon all parties to this action via CM-ECF.

Dated: Port Washington, New York
January 13, 2021

s/ James R. Froccaro, Jr.
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