

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 20-CV-81205-RAR**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS  
GROUP, INC. d/b/a PAR FUNDING, *et al.*

Defendants.

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**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
MOTION FOR LEAVE TO FILE EXHIBITS TO DE 692 UNDER SEAL**

Plaintiff Securities and Exchange Commission respectfully seeks leave to file under seal the exhibits to the Chart filed as DE 692, which is a chart responding to the Defendants' chart filed with their Motion to Dismiss (DE 663-22).<sup>1</sup> We seek this relief because the documents have been designated as "Confidential" pursuant to the terms of the Court's Protective Order (DE 437), and also many of them do indeed they contain personal information about third parties that should not be available on the public docket.

Accordingly, the SEC respectfully requests permission to file the exhibits under seal.

August 15, 2021

Respectfully submitted,

By: Amie Riggle Berlin  
Amie Riggle Berlin  
Senior Trial Counsel  
Florida Bar No. 630020  
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Attorney for Plaintiff

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<sup>1</sup> Because DE 663 and all attachments thereto are under seal, this filing does not appear as an option in cm-ecf for linking DE 691 and 692 as responsive to that filing. However, they are.

**SECURITIES AND EXCHANGE  
COMMISSION**

801 Brickell Avenue, Suite 1950

Miami, Florida 33131

Telephone: (305) 982-6300

Facsimile: (305) 536-4154

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this fifteenth of August 2021 via CM-ECF on all defense counsel and via email on the *Pro Se* Defendant in this case.

Amie Riggle Berlin

Amie Riggle Berlin

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\_\_\_\_\_ /

**[PROPOSED] ORDER GRANTING SECURITIES AND EXCHANGE COMMISSION'S  
MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS TO THE SEC FILING**

THIS CAUSE comes before the Court upon the Securities and Exchange Commission's Motion for Leave to file under seal exhibits to DE 692. [ECF No. 693].

Having reviewed the Motion and being otherwise duly advised, it is hereby

**ORDERED AND ADJUDGED** that the Emergency Motion to Seal is **GRANTED**.

The SEC may file the exhibits to the filing at DE 692 under seal.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_\_ day of August , 2021.

\_\_\_\_\_  
**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

Copies to: Counsel of record