

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

**CASE NO.: 20-CV-81205-RAR**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

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

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**JOINT NOTICE OF COMPLIANCE**

Plaintiff and all Defendants hereby file a Notice of Compliance, advising the Court that all parties complied with the Order to hold an informal settlement conference [ECF No. 739]. The parties held the informal settlement conference on September 17, 2021. On that day, counsel for the Securities and Exchange Commission held four separate settlement discussions spanning a total of approximately 7 hours with counsel for: (1) Dean Vagnozzi; (2) Michael Furman; (3) Perry Abbonizio; and (4) Lisa McElhone, Joseph Cole Barleta, and Joseph LaForte. No tentative settlements were reached, but discussions are ongoing with Defendants Vagnozzi, Abbonizio, McElhone, and LaForte.

September 22, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 22nd day of September 2021 via cm-ecf on all defense counsel in this case.

s/ Amie Riggle Berlin  
Amie Riggle Berlin