

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

CASE NO. 20-cv-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

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

Defendant(s).

**DEFENDANT PERRY ABBONIZIO’S NOTICE OF JOINDER IN DEFENDANTS’
JOSEPH W. LAFORTE, LISA MCELHONE, AND JOSEPH COLE BARLETA’S
JOINT MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant Perry Abbonizio (“Abbonizio”) files this Notice of Joinder in the Joint Motion for Partial Summary Judgment (the “Joint Motion”) filed by Defendants Joseph W. LaForte (“LaForte”), Lisa McElhone (“McElhone”), and Joseph Cole Barleta (“Cole”) on October 4, 2021 [D.E. 804]. LaForte, McElhone, and Cole move for partial summary judgment on the SEC’s claims against them for violations of Section 10(b) and Rule 10b-5 of the Exchange Act and for violations of Section 17(a) of the Securities Act. The arguments raised in the Joint Motion are equally applicable to the SEC’s claims against Abbonizio. As such, Abbonizio states that in the event the Court grants the Joint Motion in whole or in part, the Court should grant summary judgment in Abbonizio’s favor, as well, for the same reasons.

Date: October 6, 2021

Respectfully submitted,

/s/ Jeffrey E. Marcus
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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2021, a true and correct copy of the foregoing was served via CM/ECF on all counsel or parties of record.

By: /s/ Jeffrey E. Marcus
Jeffrey E. Marcus