

**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,

Defendants.

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**DEFENDANTS' UPDATED AND RESPONSIVE NOTICE  
TO JOINT NOTICE OF COMPLIANCE DATED SEPTEMBER 22, 2021 (ECF 790)**

The Joint Notice of Compliance dated September 22, 2021 (ECF 790) stated that: "No tentative settlements were reached, but discussions are ongoing with Defendants Vagnozzi, Abbonizio, McElhone, and LaForte." Defendants advise that subsequent to that Notice, the Parties reached an impasse as to certain conditions precedent to continued discussions. Accordingly, there are currently no ongoing settlement discussions with the SEC.

Dated: October 11, 2021

Respectfully submitted,

Law Offices of Alan S. Futerfas  
*Attorneys for Lisa McElhone*  
565 Fifth Avenue, 7th Floor  
New York, New York 10017  
(212) 684-8400  
asfuterfas@futerfaslaw.com

By: /s/ Alan S. Futerfas  
ALAN S. FUTERFAS  
Admitted *Pro Hac Vice*

GRAYROBINSON, P.A.  
*Local Counsel for L. McElhone*  
333 S.E. 2d Avenue, Suite 3200  
Miami, Florida 33131  
Telephone: (305) 416-6880  
Facsimile: (305) 416-6887  
joel.hirschhorn@gray-robinson.com

By: /s/ Joel Hirschhorn  
JOEL HIRSCHHORN  
Florida Bar No. 104573

Fridman Fels & Soto, PLLC  
2525 Ponce de Leon Boulevard, Suite 750 Coral  
Gables, Florida 33134  
Direct Dial: (305) 569-7701  
Email: [asoto@ffslawfirm.com](mailto:asoto@ffslawfirm.com)  
*Co-Counsel for Defendant Joseph LaForte*

By: /s/ Alejandro Soto  
Alejandro Soto  
Florida Bar No. 172847

Bettina Schein, Esq.  
*Attorney for Joseph Cole Barleta*  
565 Fifth Avenue, 7th Floor  
New York, New York 10017  
Telephone: (212) 880-9417  
bschein@bettinascheinlaw.com

By: /s/ Bettina Schein

BETTINA SCHEIN  
Admitted Pro Hac Vice

Andre G. Raikhelson, Esq.  
*Local Counsel for Joseph Cole Barleta*  
301 Yamato Road, Suite 1240  
Boca Raton, FL 33431  
Telephone: (954) 895-5566  
arlaw@raikhelsonlaw.com

By: /s/ Andre G. Raikhelson

ANDRE G. RAIKHELSON  
Florida Bar No. 123657

**KOPELOWITZ OSTROW  
FERGUSON WEISELBERG GILBERT**  
One W. Las Olas Blvd., Suite 500  
Fort Lauderdale, Florida 33301  
*Attorneys for Joseph W. LaForte*

By: /s/ Joshua R. Levine

DAVID L. FERGUSON  
Florida Bar Number: 0981737  
Ferguson@kolawyers.com  
JOSHUA R. LEVINE  
Florida Bar Number: 91807  
Levine@kolawyers.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on October 11, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

*s/Joel Hirschhorn*  
JOEL HIRSCHHORN