

**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).

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

Defendant Dean Vagnozzi ("Vagnozzi") 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]. In the event the Court grants the Joint Motion in whole or in part, the Court should grant summary judgment in Vagnozzi's favor, as well, for the same reasons.

Date: October 20, 2021

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Attorneys for Defendant Dean Vagnozzi

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2021, a true and correct copy of the foregoing was served via CM/ECF on all counsel or parties of record.

By: /s/ Brian P. Miller

Brian P. Miller