

**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' MOTION TO REMOVE UNREDACTED EXHIBIT FROM THE
RECORD AND REPLACE WITH REDACTED EXHIBITS**

Pursuant to Federal Rule of Civil Procedure 5.2, Defendants Lisa McElhone, Joseph W. LaForte, Joseph Cole Barleta, Perry S. Abbonizio, Dean J. Vagnozzi, and Michael C. Furman (“Defendants”) move for the entry of an order directing the Clerk to remove from the record an exhibit containing personal data identifiers [D.E. 966-4] and replace it with the redacted exhibits accompanying this Motion, and in support thereof state as follows:

1. On November 16, 2021, Plaintiff Securities and Exchange Commission (“Plaintiff”) and Defendants filed their Joint Pretrial Stipulation. *See* D.E. 966. Defendants filed their Witness List as Exhibit D to the Pretrial Stipulation. *See* D.E. 966-4.

2. Defendants realized after filing the Witness List, however, that they had mistakenly filed a version of the Witness List that was incomplete and not properly redacted in accordance with the Southern District of Florida’s CM/ECF Administrative Procedures.

3. As such, Defendants respectfully request that the Court enter an order directing the Clerk to replace the previously filed Witness List, which is in the record at D.E. 966-4, with the redacted version of the same document that accompanies this Motion [at D.E. 968-1].

4. Moreover, because the Pretrial Stipulation was incomplete in that it omitted Defendant Furman's separate Witness List, Defendants respectfully request that the Court accept Defendant Furman's redacted Witness List — which accompanies this Motion [D.E. 968-2] — as Exhibit G to the Joint Pretrial Stipulation.

CERTIFICATE OF COMPLIANCE WITH RULE 7.1(a)(3)

In accordance with Local Rule 7.1(a)(3), the undersigned certify that Plaintiff does not have any objection to the relief sought in this Motion.

November 16, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 16, 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

**Complete Business Solutions Group
Defendants' Trial Witness List**

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3. Perry Abbonizio
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4. Dean J. Vagnozzi
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5. Michael Furman
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6. Aida Lau
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7. Ruoyi "Zoe" Lou

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8. James Klenk

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9. Victoria Villarose

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10. Anthony Zingarelli

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11. Norman Valz

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13. Brett Berman, Esq.

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14. Steve Cohen

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17. Martin Hewitt

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18. John Pauciulo

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19. Peter Mulcahy

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20. Rod Ermel

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Telephone: [REDACTED]

21. Ken Bacon

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Telephone: [REDACTED]

22. Rick Huff

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Telephone: [REDACTED]

23. Neil Levine

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Telephone: [REDACTED]

24. Willem Van de Berg

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25. Anthony Bernato

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35. Mark Mehok

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36. Timothy Hughes

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37. David Chessler

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39. Gary Beasely

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40. Vincent Camarda

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42. Greg Talbot

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43. Frank Scarpatti

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44. Anthony Secia

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45. Badalamenti, Anita

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46. Price, Michelle

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47. Westhead, Shannon

48. Don Read

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43. Mazur, Joseph

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48. Vagnozzi, Albert

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52. Joseph Canty
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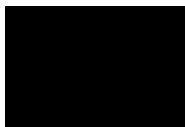
61. Sean Whalen
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62. Julia Caricato
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63. Bruce McNider
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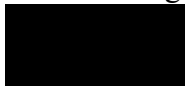
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