

**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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**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE ONE OMNIBUS  
MOTION FOR RELIEF AGAINST DEFENDANTS FURMAN, MCLEHONE,  
LAFORTE, AND BARLETA, AND FOR ADDITIONAL TIME**

Plaintiff Securities and Exchange Commission respectfully requests until April 12, 2022 to file one omnibus motion requesting the specific disgorgement and penalty amounts and other relief against Defendants Lisa McElhone, Michael Furman, Joseph LaForte, and Joseph Barleta.<sup>1</sup> Currently, there are three separate deadlines for the SEC to seek this relief through separate motions.

The SEC seeks leave to instead file one omnibus motion against these four remaining Defendants. One omnibus motion will conserve judicial and SEC resources, and the request for additional time is required in order to obtain authorization from the Commissioners of the SEC for the specific monetary amounts the SEC will seek.

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<sup>1</sup> The SEC is not seeking an enlargement of time to seek disgorgement and penalty amounts against the remaining Defendants, Perry Abbonizio and Dean Vagnozzi. These Defendants are in a different posture based on settlement offers, and the SEC anticipates not needing additional time to file motions for final judgment on or before the February 21 and 22, 2022 deadlines the court set as to these two defendants.

This motion is not sought for purposes of delay, and will not affect any trial date or other deadline in this case. Counsel for the Defendants agree with the relief sought herein.

WHEREFORE, the SEC respectfully seeks an Order granting the SEC leave to file one omnibus motion against Defendants Furman, Barleta, McElhone, and LaForte by April 12, 2022.

February 10, 2022

Respectfully Submitted,

By: Amie Riggle Berlin  
Amie Riggle Berlin  
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**CERTIFICATE OF CONFERRAL**

Undersigned Counsel conferred with Defendants' counsel, who does not oppose the relief sought in this Motion.

Amie Riggle Berlin  
Amie Riggle Berlin

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 10th day of February 2022 via CM-ECF on all defense counsel in this case.

Amie Riggle Berlin  
Amie Riggle Berlin

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**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

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

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**ORDER GRANTING PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE  
ONE OMNIBUS MOTION FOR RELIEF AGAINST DEFENDANTS FURMAN,  
MCLEHONE, LAFORTE, AND BARLETA, AND FOR ADDITIONAL TIME**

**THIS MATTER** came before the Court upon Plaintiff's Motion for leave to file one omnibus motion for relief against Defendants Michael Furman, Lisa McElhone, Joseph LaForte, and Joseph Cole Barleta, and for additional time.

After reviewing the Motion and otherwise being duly advised,

**IT IS HEREBY ORDERED** that the Motion **IS GRANTED**. Securities and Exchange Commission shall have an until April 12, 2022 to file one omnibus motion requesting the specific disgorgement and penalty amounts against Defendants Furman, McElhone, Barleta and LaForte and for a permanent injunction against Defendant Furman.

**DONE** and **ORDERED** in Fort Lauderdale, Florida, this \_\_\_\_ day of February, 2022.

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RODOLFO A. RUIZ II  
UNITED STATES DISTRICT JUDGE

Copies to; Counsel of Record