

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,

and

THE LME 2017 FAMILY TRUST, a/k/a

LME 2017 FAMILY TRUST,

Relief Defendant.

**DEFENDANT, MICHAEL C. FURMAN’S, NOTICE OF JOINDER IN DEFENDANTS,
JOSEPH W. LAFORTE, LISA MCELHONE, AND JOSEPH COLE BARLETA’S,
MOTION TO STRIKE ALLEGATIONS FROM PLAINTIFF’S
OMNIBUS MOTION FOR FINAL JUDGMENTS [ECF NO. 1224]**

Defendant, Michael C. Furman (“*Mr. Furman*”) files this Notice of Joinder in the Motion to Strike Ponzi Allegations from Plaintiff’s Omnibus Motion for Final Judgments (the “*Motion*”) filed by Defendants Joseph W. LaForte (“*LaForte*”), Lisa McElhone (“*McElhone*”), and Joseph Cole Barleta (“*Cole*”) on May 4, 2022 [ECF No. 1224]. In the event the Court grants the Motion in whole or in part, the Court should grant it in Furman’s favor, as well, for the same reasons.

Further, because undersigned counsel is currently out of the country and not returning until May 16, 2022, Mr. Furman requests the ability to supplement the record upon his counsel’s return to address the fact that Plaintiff never made any reference of any Ponzi scheme or similar criminal enterprise, the evidence shows that Par Funding was in fact profitable, that Furman and his counsel

repeatedly and consistently objected to issues or matters that were not pled, and that Furman requested that the Plaintiff be required to clarify the nature of its allegations, to avoid the exact issues presented by the Motion.

Respectfully submitted,

MILLENNIAL LAW, INC.
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By: *s/ Zachary P. Hyman* _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **10th** day of May, 2022, the foregoing was filed using the Court's CM/ECF Filing system which will transmit Notices of Electronic Filing generated by CM/ECF to all counsel of record.

By: *s/ Zachary P. Hyman* _____

Zachary P. Hyman