

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No: 9:20-CV-81205

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

vs.

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

Defendants

L.M.E. 2017 FAMILY TRUST,

Relief Defendant.

NOTICE OF APPEAL

The undersigned attorney, Andre G. Raikhelson, of the Law Offices of Andre G. Raikhelson, hereby files this NOTICE OF APPEAL of the Final Judgment as to Defendant Joe Cole Barleta [D.E. 1434], the Order Granting in Part Plaintiff's Omnibus Motion for Final Judgment [D.E. 1432], as well as the Order Granting Motion to Compel Documents [D.E. 1222] that was recently dismissed by the Eleventh Circuit for jurisdictional reasons.

Date: November 9, 2022

Respectfully submitted,

Law Offices of Andre G. Raikhelson, LLC.
Counsel for Defendant
7000 W Palmetto Park Road, Suite 210
Boca Raton, FL 33433
Telephone: (954) 895-5566
Primary: arlaw@raikhelsonlaw.com

/s/ Andre G. Raikhelson
Andre G. Raikhelson Esq.
Bar Number: 123657

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 9, 2022, 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/ Andre G. Raikhelson
Andre G. Raikhelson Esq.