## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No: 9:20-CV-81205

SECURITIES COMMISSION	AND	EXCHANGE
	Plaintiff,	
VS.		
COMPLETE B GROUP, INC. d al.		
Defendants		

## DEFENDANT, JOSEPH COLE BARLETA'S NOTICE OF APPEAL

COMES NOW, Defendant, Joseph Cole Barleta ("Cole") who files this Notice of Interlocutory Appeal Pertaining to this Court denying Cole's EXPEDITED MOTION to Modify or Clarify Preliminary Injunctive Relief as to Capital Source 2000, Inc. [D.E. 1580]. The Lower Tribunal's Order is immediately appealable under 28 U.S. Code § 1292, holding that the appellate courts have jurisdiction to hear appeals from:

"Interlocutory orders of the district courts of the United States . . . granting, continuing, modifying, refusing or dissolving injunctions, or refusing to dissolve or modify injunctions, . . ."

DATED: June 5, 2023

Respectfully submitted,

By: Law Offices of Andre G. Raikhelson, LLC.

Counsel for Defendant, Joseph Cole Barleta

7000 W Palmetto Park Road

Suite 240

Boca Raton, FL 33433

Telephone: (954) 895-5566

Primary Email: arlaw@raikhelsonlaw.com

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

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was served to all counsel of record through the CM/ECF system.