

**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

---

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

COMES NOW, Defendant, Joseph Cole Barleta ("Cole") who files this Notice Appeal Pertaining to this Court holding Cole in Contempt of Court, forcing him to produce documents post final judgment of the Receivership, and forcing him to pay \$28,874.50 [D.E. 1586]. The Lower Tribunal's Order is immediately appealable under 28 U.S. Code § 1291, and the Eleventh Circuit's interpretation of 28 U.S. Code § 1291 in *In re Subpoena*, 58 F.4th 1232 (11th Cir. 2023)

DATED: June 10, 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.