

**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.

**NON-PARTY CAPITAL SOURCE 2000, INC.
NOTICE OF ERRATA AND CORRECTION**

COMES NOW Non-Party, Capital Source 2000, Inc. (“Capital Source”), by and through his undersigned counsel files this notice of correction. Capital Source states the following in support:

1. On October 24, 2023 Capital Source filed a Motion to Intervene [D.E. 1734].
2. The aforementioned Motion contained an explanation of the post-disgorgement Deposition of Joseph Cole Barleta on behalf of Capital Srouce. One of those points raised in the Underlying Motion was that Norman Valz was the Receivership’s collection counsel.
3. Upon making that representation, Mr. Gaetan Alfano wrote in an email,

Good Afternoon Andre,

At page 5 of the attached Motion to Intervene/Amend Modify Asset Freeze, you wrote:

“Likewise there are payments of \$5,000 to Norm Valz, which is collections counsel also used by the Receiver.” You also repeated a version of this statement at page 69 of the deposition transcript attached to the Motion.

Please note that Mr. Valz never has served as collections counsel for the Receiver. On what basis did you make this statement?

Please respond as soon as possible. If, as I suspect, you have no basis for this statement, then please correct the record.

Thank you.
Gaetan

4. Undersigned told Mr. Alfano where he Received that information, and so as to not make a mistake, Undersigned asked Mr. Alfano for a declaration indicating that he never hired Mr. Valz. Undersigned stated that he will accept as true whatever is written in the declaration pertaining to Mr. Valz's role with the Receivership, and issue a notice of errata indicating the same.
5. Mr. Alfano refused put together a declaration (even though it would have probably been easier for him than to send numerous emails), and independently contacted Mr. Valz. Mr. Valz wrote Mr. Alfano and Underisnged the following email.

From: NORMAN VALZ <nvalz@msn.com>
Sent: Wednesday, October 25, 2023 4:39 PM
To: Andre Raikhelson <arlaw@raikhelsonlaw.com>; Gaetan J. Alfano <GJA@Pietragallo.com>
Subject: Clarification of Assertion in CS 2000 Motion to Intervene

Hello Andre and Gaetan:

Gaetan sent me a copy of the CS 2000 Motion to Intervene in the SEC case. I wanted to clarify one point where perhaps there was a misunderstanding. I was never the attorney for or employed by the Par Funding Receiver. Over the past few years, I have communicated with the Receiver's office fairly often to essentially pass on communications received from the many Judgment Debtors who occasionally reach out to me for one reason or another. There are about 1000 Par Funding Judgments where I am still the attorney of records, and on average about once or twice a month a Judgement Debtor will call me to get a Judgment marked as satisfied or to initiate discussions to settle and past obligation or fix a discrepancy. I put these people in touch with the Receiver's Office.

Let me know if anyone has further questions or needs clarification. I'd be glad to follow up.

Best regards,

Norm Valz

6. The email says, clearly, that Mr. Valz was never the attorney for, or employed by, the Par Funding Receiver.
7. Likewise, the email says, “There are about 1000 Par Funding Judgments where I am still the attorney of records,” and “Over the past few years, I have communicated with the Receiver's office fairly often to essentially pass on communications received from the many Judgment Debtors who occasionally reach out to me for one reason or another.”
8. Whether that is considered “employed” or not is not under Undersigned’s purview. However, Undersigned issues this notice of errata and correction in an attempt to more fully explain to the Court Mr. Valz’s position in the Receivership (or perhaps lack of position)
9. Notwithstanding the above, and what Undersigned attempted to explain to Mr. Gaetan, whether Mr. Valz was employed by the Receivership or not does not change either the analysis that the Court must perform in deciding the Underlying Motion.
10. In other words, none of the analysis hinges on Mr. Valz’s status of employment.
11. Regardless, Undersigned has an ethical duty to correct the record, and that is what Undersigned is attempted to do.

DATED: October 26, 2023

Respectfully submitted,

By: Law Offices of Andre G. Raikhelson, LLC.
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Boca Raton, FL 33433
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/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.