

**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.

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**MOTION TO WITHDRAW AS COUNSEL FOR  
DEFENDANT JOSEPH W. LAFORTE**

Attorney James R. Froccaro respectfully moves to withdraw as counsel for Defendant James W. LaForte. Mr. Froccaro states as follows:

1. Mr. LaForte and I have agreed that he is no longer in need of my services in this case.
2. In accordance with Local Rule 11.1(d)(3), I have notified Mr. LaForte and counsel for the SEC of my intention to withdraw. The address of co-counsel for Mr. LaForte appears below.

WHEREFORE, James R. Froccaro, Esq., respectfully requests entry of an Order granting his motion to withdraw as counsel for James W. LaForte. A proposed Order is attached.

Dated: Port Washington, New York  
May 25, 2021

s/ James R. Froccaro, Jr.  
JAMES R. FROCCARO, JR. (*PRO HAC*)  
20 Vanderventer Ave., Ste. 103W  
Port Washington, NY 11050  
(516) 944-5062  
jrfesq61@aol.com

Dated: Fort Lauderdale, Florida  
May 25, 2021

s/ David Lawrence Ferguson  
DAVID LAWRENCE FERGUSON  
THE KOPELOWITZ & OSTROW FIRM PA  
200 S.W. 1st Avenue, 12 Floor  
Fort Lauderdale, Florida 33301  
(954) 525-4100  
ferguson@kolawyers.com

*Attorneys for Defendants L.M.E. 2017 Family  
Trust, Joseph LaForte and Lisa McElhone*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 24, 2021, I caused the foregoing document to be delivered to the Clerk of Court and served upon all parties to this action via CM-ECF.

Dated: Port Washington, New York  
May 25, 2021

s/ James R. Froccaro, Jr.  
JAMES R. FROCCARO, JR. (*PRO HAC*)  
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Port Washington, NY 11050  
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**ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL FOR  
DEFENDANT JOSEPH W. LAFORTE**

Upon due consideration, the motion of James R. Froccaro, Jr., to be relieved as counsel to Defendant Joseph W. LaForte his hereby **GRANTED**.

**DONE AND ORDERED** at Miami, Florida on May \_\_\_\_, 2021.

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RODOLFO A. RUIZ II  
United States District Judge