

**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.,**

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**SECURITIES AND EXCHANGE COMMISSION'S  
NOTICE OF FILING UPDATED ASSET FREEZE RESULTS**

Plaintiff Securities and Exchange Commission hereby files an updated notice of bank accounts and balances frozen within each account. This update includes financial institutions from which we recently received reports of funds frozen. We are not waiting to hear from any additional financial institutions and believe this includes all frozen funds in all accounts at issue in the Court's asset freeze order. However, since the Defendants did not provide an accounting or a complete accounting, it is possible there are accounts of which we are not aware and that have not been frozen.

As set forth in the attached report, the total amounts frozen against certain corporate Defendants is as follows:

Complete Business Solutions Group: \$20,999,829 (inclusive of all ACH frozen payments due from merchants under the merchant cash advance loan agreements, as well as all cash in all bank accounts)

Full Spectrum Processing: \$31,950

ABetterFinancialPlan.com: \$49,092

ABFP Income Fund: \$397

ABFP Income Fund 2: \$1,026,691

August 20, 2020

Respectfully submitted,

By: s/ Amie Riggle Berlin  
Amie Riggle Berlin  
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**SECURITIES AND EXCHANGE  
COMMISSION**  
801 Brickell Avenue, Suite 1800  
Miami, Florida 33131  
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Facsimile: (305) 536-4154

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served this 20th day of August 2020 via email and cm-ecf on all defense counsel in this case.

s/ Amie Riggle Berlin  
Amie Riggle Berlin

**SEC v COMPLETE BUSINESS SOLUTIONS GROUP, INC. d/b/a PAR FUNDING**

Recipients of Asset Freeze Order

1. Actum Processing, LLC
  - a. \$2,349,871 frozen
    - i. \$2,000,292 held in Complete Business Solutions Group Inc. account ending in 0035
    - ii. \$75,662 held in Fast Advance Funding account ending in 0047
    - iii. \$64,400 held in Contract Financing Solutions Inc. account ending in 0160
    - iv. \$101,072 held in Capital Source 2000 Inc. account ending in 0058
    - v. \$108,445 in 2 accounts (ending in 0067 and 0176) held by Broadway Advance
2. Atlantic Capital Bank – no accounts frozen
3. Atlantic Community Bankers Bank – no accounts frozen
4. Austin Telco Federal Credit Union – no accounts frozen
5. Bancorpsouth – no accounts frozen
6. Bank of America – no accounts frozen
7. Bryn Mawr Trust Corp. – no accounts frozen
8. CamaPlan Self-Directed IRA LLC – no accounts frozen
9. Capital One 360
  - a. \$324,707 frozen in 2 accounts (ending in 7181 and 9777) held by Dean and Christa Vagnozzi
10. Centennial Bank – no accounts frozen
11. Charles Schwab
  - a. \$10,530,440 frozen in 2 accounts held by Lisa McElhone
12. Citizens Bank
  - a. \$2,302,126 frozen – 12 accounts held by various entities and individuals<sup>1</sup>
13. Columbia Bank (New Jersey) – no accounts frozen
14. Columbia State Bank – no accounts frozen
15. Comerica Bank – no accounts frozen
16. Empire National Bank – no accounts frozen
17. Empire State Bank
  - a. \$7,664,875 frozen in 2 accounts (ending in 4825 and 5805) held by Complete Business Solutions Group, Inc.
18. ENT Credit Union – no accounts frozen
19. FedChex
20. First Bank of New Jersey
  - a. \$7,414,320 frozen
    - i. \$6,722,319 held in Complete Business Solutions accounts

<sup>1</sup> Accounts ending in 3282 (\$21,815 – Full Spectrum Processing), 3290 (\$10,135 – Full Spectrum Processing), 0345 (\$123,459 – Lisa McElhone), 8156 (\$401,393 – Lisa McElhone), 9567 (\$41,211 – Abetterfinancialplan.com), 8766 (\$827,358 – Dean Vagnozzi), 0350 (\$3 – Dean Vagnozzi), 9575 (\$208,528 – ABBFP Management Company), 9737 (\$397 – ABFP Income Fund), 9745 (\$7,885 – ABFP Income Fund 2), 8962 (\$15,861 – Perry Abbonizio), and 7616 (\$644,081 – Perry Abbonizio)



- ii. \$692,001 held in Joseph Cole Barleta accounts
- 21. First Citizens Bank (acquired by Biscayne Bank) – no accounts frozen
- 22. First Source Bank (Indianapolis, IN) – no accounts frozen
- 23. Florida Community Bank nka Synovus
  - a. \$180,701 frozen
    - i. \$167,737 in 2 accounts (ending in 9306 and 1697) held by The United Fidelis Group Corp.
    - ii. \$12,964 held in Fidelis Financial Planning LLC account ending in 9934
- 24. Glacier Bank
  - a. \$7,431,803 frozen
    - i. \$4,839,634 held in Eagle Six Consultant account ending in 2187
    - ii. \$108,149 held in Heritage Business Consulting account ending in 2233
    - iii. \$2,484,020 held in Complete Business Solutions Group account ending in 3352
- 25. JP Morgan Chase – no accounts frozen
- 26. Kota Pay – no accounts frozen
- 27. Liberty Bank (Middletown, Connecticut) – no accounts frozen
- 28. Meridian Bank
  - a. \$1,374,623 frozen in 2 accounts (ending in 6314 and 6306) held by Capital Source 2000
- 29. Network Merchants, LLC – no accounts frozen
- 30. NuView Trust Co. – no accounts frozen
- 31. OnPoint Community Credit Union – no accounts frozen
- 32. PNC Bank – no accounts frozen
- 33. Priority Payment Systems
  - a. \$6,158,010 frozen
    - i. \$2,128,323 held in Par Funding account ending in 6911
    - ii. \$2,594,601 held in Par Funding Prefund account ending in 7027
    - iii. \$8,142 held in 21Capital Source 2000 Inc. account ending in 6995
    - iv. \$96,930 held in 80Capital Source 2000 Prefund account ending in 7219
    - v. \$168,528 held in Contract Financing Solutions Inc. account ending in 6641
    - vi. \$816,620 held in Contract Financing Solutions Inc. Prefund ending in 7028
    - vii. \$12,920 held in Fast Advance Funding LLC account ending in 6519
    - viii. \$331,946 held in Fast Advance Funding LLC Prefund account ending 7107
- 34. Republic Bank – no accounts frozen
- 35. Santander Bank, N.A. – no accounts frozen
- 36. TD Ameritrade
  - a. \$1,471,940 frozen
    - i. \$362,187 held in Dean and Christa Vagnozzi account ending in 4382
    - ii. \$62,947 held in Furman Holdings account ending in 8663
    - iii. \$25,000 in 2 accounts (ending in 1058 and 3362) held by Michael Furman
    - iv. \$1,018,806 held in ABFP Income Fund 2 account ending in 1080
    - v. \$.01 held in Anita Vagnozzi account ending in 4114

- vi. \$3,000 in 2 accounts (ending in 9955 and 1954) held by Dean Vagnozzi as Custodian
37. TD Bank – no accounts frozen
38. The Bancorp Bank – no accounts frozen
39. Victory Bank
- a. \$1,076,029 frozen
    - i. \$1,068,148 held in Abetterfinancialplan.com account ending in 4507
    - ii. \$7,881 held in Dean and Christa Vagnozzi account ending in 4566
40. Wells Fargo
- a. \$2,501,275 frozen
    - i. \$1,831,054 held in Retirement Evolution Group account ending in 6902
    - ii. \$669,814 held in Retirement Evolution Insured Income Fund ending in 0153
    - iii. \$366 held in Retirement Evolution Income Fund account ending in 8510
    - iv. \$41 held in RE Income Fund 2 account ending in 5153