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, and

L.M.E. 2017 FAMILY TRUST,

Relief Defendant.

_____/

PLAINTIFF'S EXHIBITS ADMITTED INTO EVIDENCE DURING AUGUST 18, 2020 PRELIMINARY INJUNCTION HEARING

NUMBER	DESCRIPTION
Ex. 1	PA Business Records for Full Spectrum
Ex. 2	March 5, 2020 Deposition Transcript, LaForte
Ex. 3	June 30, 2020 Deposition Transcript, CBSG
Ex. 4	February 11, 2020 30b6 Deposition Transcript, CBSG
Ex. 5	SEC Attestation, Full Spectrum not registered
Ex. 6	Corporate records of CBSG
Ex. 7	Fictitious name filing, CBSG dba Par Funding
Ex. 8	Nov 28, 2018 PA Order against CBSG
Ex. 9	December 2018 NJ Order against CBSG
Ex. 10	SEC Attestation, CBSG not registered

NUMBER	DESCRIPTION
Ex. 11	CBSG Form D 2020
Ex. 12	McElhone Linked In Page
Ex. 13	Declaration of Melissa Davis
Ex. 14	Oregon Cease and Desist Order against McElhone
Ex. 15	SEC Attestation regarding McElhone not registered
Ex. 16	SEC Attestation regarding Cole not registered
Ex. 17	December 5, 2019 Deposition of LaForte
Ex. 18	Declaration of Kara DePietro
Ex. 19	Declaration of Michael Foti
Ex. 20	Transcript of Nov 2019 Sales Dinner
Ex. 21	SEC Attestation re Joseph LaForte not registered
Ex. 22	Jed Foret Declaration of Perry Abbonizio address
Ex. 23	**SEALED DOCUMENT**
Ex. 24	Texas State Board Deposition of Gary Beasley
Ex. 25	Rene Meyer Declaration
Ex. 26	SEC Attestation re Abbonizio not registered
Ex. 27	Declaration of Christine Rainwater - November 6, 2018 email from "Joe Mack."
Ex. 28	Declaration of Michelle Rago - December 3, 2019 email from Joe Mack to Michelle Rago
Ex. 29	PA Certified records for A Better Financial Plan Capital Management, LLC
Ex. 30	Certified records for abetterfinancialplan.com, LLC.
Ex. 31	Certified court record of Information, Plea, and Sentencing papers for NY criminal case against LaForte, for which he was sentenced in 2007
Ex. 32	LaForte CRD
Ex. 33	LaForte's Criminal Plea in NJ Fed Case
Ex. 34	LaForte Criminal Sentencing in NJ Case

Ex. 35	Declaration of Ray Andjich - FBOP Inmate Locator for LaForte
Ex. 36	Abbonizio FINRA Certified CRD
Ex. 37	TX Cease and Desist Order
Ex. 38	List of ABFP Investment Fund Investors Undated ABFP Income Fund Investors - V Jacqmein Dec
Ex. 39	Certified Delaware Records for ABFP Investment Fund
Ex. 40	November 15, 2018 Testimony Transcript of Dean Vagnozzi
Ex. 41	ABFP Management's Management Services Agreement with Fidelis Financial Planning, LLC - 2018-04-24 ABFP Fidelis Planning Mgmt Service Agreement-Dec V Jacqmein
Ex. 42	Declaration of Jeramy Heintz - ABFP Management Services Agreement Agreement with Merchant Growth saying ABFP Mgmt is manager co
Ex. 43	Parfunding Website-V Jacq Dec
Ex. 44	Declaration of Michael Foti
Ex. 45	Pa_Certfi. State_abetterfinancialplan.com LLC _6.29.20
Ex. 46	Declaration of V Jacqmein - abetterfinancialplanning.com website - ABPF Website
Ex. 47	ABFP.comLLC SEC Attestation not registered
Ex. 48	ABFP Management SEC Attestation not registered
Ex. 49	ABPF Income Fund LLC SEC Attestation not registered
Ex. 50	ABFP Income Fund 2, LP Form D
Ex. 51	RE Income Fund LLC Form D
Ex. 52	ABFP Income Fund LLC Form D
Ex. 53	PADOBS Dec - ABFP Finders Agreement with CBSG
Ex. 54	Retirement Evolution LLC Form D
Ex. 55	ABFP Income Fund 2 PPM - V Jacqmein Dec
Ex. 56	ABFP Form D
Ex. 57	Certified PA order against Vagnozzi/ABFP

Ex. 58	Retirement Evolution Income Fund LLC Form D
Ex. 59	RE Income Fund, LLC PPM pulled from enjoyretirement website
Ex. 60	February 2018 email from Vagnozzi to Abbonizio - V Jacqmein dec
Ex. 61	Fidelis Financial Planning LLC Dec of V Jacqmein - FFP MCA Fidelis Fund Client PPM
Ex. 62	Declaration of Gary DeLucco - Fidelis PPM
Ex. 63	Omitted
Ex. 64	Form D for Fidelis D and D-A
Ex. 65	Declaration of Ray Andjich- Furman CPA License record
Ex. 66	Jed Foret Declaration of Michael Furman Proof of where Furman lives
Ex. 67	SEC_Attest_The United Fidelis Group Inc. not registered
Ex. 68	SEC_Attest_Fidelis Financial Planning, LLC not registered
Ex. 69	SEC_Attest_Michael Furman not registered
Ex. 70	Declaration of Ray Andjich- Par Funding web capture
Ex. 71	Par Funding Note
Ex. 72	Omitted
Ex. 73	Declaration of Ray Andjich Court Search
Ex. 74	Declaration of Crystal Ivory
Ex. 75	2019 CBSG Form D
Ex. 76	Expert report of Charles S. Lunden,
Ex. 77	PADOBS Dec - Jan 2018 PA Subpoena
Ex. 78	PADOBS Dec - Composite of Finders Agreements
Ex. 79	PADOBS Dec - CBSG Chart showing investors by Finder and how much they raised
Ex. 80	2018-05-21 Email from Michelle Price to Donna Iannuzzi re abfp starts other funds
Ex. 81	LaForte Linked In Page

Ex. 82	LaForte Twitter Page
Ex. 83	Forbes profile for LaForte
Ex. 84	Composite of LaForte's Forbes articles
Ex. 85	Declaration of Chad Frost
Ex. 86	Declaration of Jim Frost
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Ex. 88	PADOBS Dec -CBSG Response to PADOBS Subpoena
Ex. 89	PADOBS Dec Security Agreements and Promissory Notes to PADOBS
Ex. 90	PADOBS Dec CBSG Amended and Restated Note Purchase Agreement-TX
Ex. 91	Declaration of Julie Caricato
Ex. 92	Declaration of Mary Carleton
Ex. 93	Declaration of Pamela A Fleetwood
Ex. 94.	Declartion of Robert L. Fleetwod
Ex. 95	Declaration of JR Harrison
Ex. 96	Declaration of Eric Husebo
Ex. 97	Declaration of Amos Jones
Ex. 98	Declaration of Loniese Jones
Ex. 99	Declaration of Julie Katz
Ex. 100	Declaration of Bruce McNider
Ex. 101	Declaration of Ronald Lipowski
Ex. 102	Declaration of Joseph Pucci
Ex. 103	Declaration of Marc A. Reiiken
Ex. 104	Declaration of Steven Weinkranz
Ex. 105	Declarations of Sean Whalen

Ex. 106	Declaration of Gianna Wolfe
Ex. 107	PA Corporate Records for Par Funding
Ex. 108	Camaplan documents
Ex. 109	Declaration of Brad Beebe
Ex. 110	Declaration of Jeramy Heintz Texas Agent Guide
Ex. 111	Merchant Site Inspection Report
Ex. 112	SEC Form D Website forms and instructions
Ex. 113	Fidelis Financial Planning LLC PPM Declaration of V Jacqmein
Ex. 114	Declaration of V Jacqmein - Gisas Par Funding email
Ex. 115	Gissas note par funding abfp wire - Declaration of V Jacqmein
Ex. 116	Joe Mack and Vag talking about their roles - V Jacqmein Dec
Ex. 117	Par Funding sending notes to gissas Dec of V Jacqmein
Ex. 118	Vagnozzi asking laforte as if laforte is in charge Dec of V Jacqmein
Ex. 119	2018.04.02 A Abbonizio Vagnozzi CBSG Marketing Material - Dec of V Jacqmein
Ex. 120	2018.01.09 Abbonizzio Vagnozzi Westhead Furman MCA Paperwork Meyers - Dec V Jacqmein
Ex. 121	2018.01.30 Furman Perry Vagnozzi Anita need update on new not for meyer - Declaration of V Jacqmein
Ex. 122	Exhibit 21 - 2016.11.28 Vagnozzi Roshelli Gentilotti Huesser McNally MCA-V Jacqmein Dec
Ex. 123	7-6-18vagnozzi; perry abbonizio 7-10-18 Note
Ex. 124	**SEALED DOCUMENT**
Ex. 125	**SEALED DOCUMENT**
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Ex. 127	**SEALED DOCUMENT**
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Ex. 129	**SEALED DOCUMENT**

Ex. 130	**SEALED DOCUMENT**
Ex. 131	CBSG Financial Statements - 12.31.2017
Ex. 132	**SEALED DOCUMENT**
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Ex. 137	Transcript of A Better Financial Plan Very Happy Clients – Milord Dec
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Ex. 140	**SEALED DOCUMENT**
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Ex. 142	July 6, 2018 email from Michelle Price to Alexis Abbonizio re ABFP Gissas fund CBSG - Dec of V Jacqmein
Ex. 143	Transcript of Email-1C Link Video- Milord Dec
Ex. 144	Transcript of A Better Financial Plan Unbranded Video – Milord Dec
Ex. 145	FORM D RE Income Fund 2
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Ex. 149	Transcript of Zoom Video-GMT20200419-135006 Deqar John – Milord Dec
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Ex. 151	Transcript of Vagnozzi and Pauciulp Video – Milord Dec
Ex. 152	**SEALED DOCUMENT**
Ex. 153	**SEALED DOCUMENT**

Ex. 154	**SEALED DOCUMENT**
Ex. 155	Transcript of Recording -6 Advertisement Recording – Milord Dec
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Ex. 157	Transcript of Transcript of Beasley Radio AD KLBJ – Milord Dec
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Ex. 159	March 26, 2019 Deposition Transcript of Dean Vagnozzi
Ex. 160	SEC C&D Order Against Abetterfinanciallplan.com and Vagnozzi
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Ex. 162	RE Income Fund 2 LLC PPM
Ex. 163	PADOBS ByBel Rutledge 2-15-18 Response
Ex. 164	1-11-18 DV email to agents about fund model
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Ex. 170	6/27/16 Email from Phillip Mowry to Dean Vagnozzi re MCA Update
Ex. 171	2/27/17 Email from Phillip Mowry to Dean Vagnozzi re MCA Dinner
Ex. 172	5/5/17 Email from Steve Cushmore to Dean Vagnozzi re Perry
Ex. 173	10/26/17 Email from Shannon Westhead to sz32836@yahoon.com cc Abbonizion and Vagnozzi re Flying to Philadelphia
Ex. 174	11/21/17 at 5:42 pm Email from Frank Andrews to Vagnozzi re Perry meeting you in DE – indeed he is
Ex. 175	11/21/17 at 7:48 pm Email from Frank Andrew to Vagnozzi re Perry meeting you in DE – Fear of Missing out
Ex. 176	12/11/17 Email from Alexis Abbonizio to Shannon Westhead re MCA DEC Updates
Ex. 177	12/14/17 Email from Joe Mack to Vagnozzi and Joe Cole re proof of Commissions

Ex. 178	12/14/17 Email from Joe Mack to Vagnozzi re Also
Ex. 179	Fleetwood Services, LLC et al v Complete Business Solutions Group,, IInc. d/b/a Par Funding, et al Case No. 18-cv-00268 (E.D. PA)
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Ex. 215	Melissa Davis Supplemental Declaration
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Ex. 217	Declaration of James Klenk