**UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 9:20-cv-81205-RAR**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**COMPLETE BUSINESS SOLUTIONS GROUP, INC. d/b/a/ PAR FUNDING, et al.,**
_____/

**CONFIDENTIAL**

**DEFENDANT DEAN VAGNOZZI'S ACCOUNTING**

Defendant DEAN VAGNOZZI (hereinafter "Defendant" or "Vagnozzi"), pursuant to Section IV of the Court's Order Granting Emergency *Ex Parte* Motion for Temporary Restraining Order and Other Relief, hereby provides the following sworn accounting.

(a) make a sworn accounting to this Court and the Plaintiff of all funds, whether in the form of compensation, commissions, income (including payments for assets, shares or property of any kind), and other benefits (including the provision of services of a personal or mixed business and personal nature) received, directly or indirectly, by the Defendant making the sworn accounting.

**RESPONSE:** Defendant is unable to provide this information at this time because he needs access to his office and files in order to answer this question. Defendant's counsel is making arrangements for such access with the Receiver's counsel. Defendant also is informed that, pursuant to *Liu v. Securities and Exchange Commission*, No. 18-1501 (U.S. June 22, 2020), all legitimate expenses would need to be deducted before this Court could award disgorgement, so that detailed accounting is required for purposes of the Court's order. Defendant will supplement this response.

EXHIBIT
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(b) make a sworn accounting to this Court and the Plaintiff of all assets, funds, or other properties, whether real or personal, held by the Defendant making the sworn accounting, jointly or individually, or for its direct or indirect beneficial interest, or over which it maintains control, wherever situated, stating the location, value, and disposition of each such asset, fund, and other property; and

(c) provide to the Court and the Plaintiff a sworn identification of all accounts (including, but not limited to, bank accounts, savings accounts, securities accounts and deposits of any kind and wherever situated) in which the Defendant making the sworn accounting (whether solely or jointly), directly or indirectly (including through a corporation, partnership, relative, friend or nominee), either has an interest or over which he has the power or right to exercise control.

**RESPONSE:** Defendant provides the following accounting of his assets, to the best of his recollection and knowledge and based on the information readily available to him:

| Assets | Ownership | Estimated Value | Secured Debt |
|---|---|---|---|
| Residence 114 Ithan Lane, Collegeville, PA | Tenancy by the Entireties | $800,000 | |
| Home Furniture / Clothes etc | Tenancy by the Entireties | Unknown | |
| Lavante SUV | Tenancy by the Entireties | $40,000 | $40,000 |
| Vanquish | Individual | $150,000 | $229,000 |
| Wrangler | Believed to be Tenancy by the Entireties | $20,000 | |
| Volvo XL40 | Individual | $25,000 | |
| Volt | Tenancy by the Entireties | $10,000 | |
| Membership Interest in ABFP Management LLC | Individual | Unknown | |
| Membership Interest in ABETTERFINANCIALPLAN.COM | Individual | Unknown | |

| | | |
|---|---|---|
| **Bank Accounts** | **Ownership** | **Estimated Value** |
| Dean/ Christa Citizens | Tenancy by the Entireties | $500,000 |
| Dean/Christa Victory Bank | Tenancy by the Entireties | $1,068,000 |
| ABFP Citizens bank | Corporate | $150,000 |
| ABFP Victory Bank | Corporate | $7,800 |
| ABFP Mgmt Co Citizens | Corporate | $200,000 |
| Dean / Christa Capital One 360 | Tenancy by the Entireties | $296,000 |
| Dean / Christa Capital One | Tenancy by the Entireties | $53,000 |
| | | |
| | | |
| **Investments** | | |
| Dean/Christa ABFP Income Fund 2 | Tenancy by the Entireties | $230,000 |
| Dean/Christa ABFP Income Fund 1 | Believed to be Tenancy by the Entireties | $50,000 |
| Dean / Christa Atrium 3 | Believed to be Tenancy by the Entireties | $185,000 |
| Dean / Christa Joint TD Ameritrade Account FSK | Tenancy by the Entireties | $172,000 |
| Dean / Christa Joint TD Ameritrade Account FSKR | Tenancy by the Entireties | $99,000 |
| Dean/Christa Berkshire Hathaway TD Ameritrade | Tenancy by the Entireties | $2,000 |
| Dean /Christa SRG Stock | Tenancy by the Entireties | $0 to $25,000 |
| Dean's KC Life Deferred Comp | Individual | $30,000 |
| Dean / Christa TD Amertrade Cash Balance | Tenancy by the Entireties | $88,468 |
| Dean's Fidelity Guaranty Life Insurance | Individual | $2,650,000 death benefit |

| | | |
|---|---|---|
| **Debts** | | |
| Student Loan | Individual | $47,000.00 |
| Tax Liability to be paid from Capital One account | Tenancy by the Entireties | $296,000.00 |
| Dean's Work Related Credit Card Debt | Individual | $17,777.00 |
| Dean's Personal Credit Card | Individual | $26,000.00 |

Pursuant to 28 U.S.C. 1746, I, Dean Vagnozzi, declare under penalty of perjury that the foregoing is true and correct.