

**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.

**DEFENDANT DEAN VAGNOZZI'S CERTIFICATE OF INTERESTED PARTIES
AND CORPORATE DISCLOSURE STATEMENT**

Defendant Dean Vagnozzi ("Defendant" or "Vagnozzi"), by and through his undersigned counsel and pursuant to Federal Rule of Civil Procedure 7.1 and this Court's Order Requiring Joint Scheduling Report and Certificates of Interested Parties [D.E. 164], hereby submits this Corporate Disclosure Statement and Certificate of Interested Parties listing all persons, associated persons, firms, partnerships, or corporations that have a financial interest in the outcome of this case, including subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal entities related to Defendant Dean Vagnozzi. Defendant reserves the right to amend, correct, or update his Corporate Disclosure Statement and Certificate of Interested Parties as necessary during the pendency of this action.

I. Corporate Disclosure Statement

Defendant Dean Vagnozzi is not a corporate entity and thus has no subsidiaries, conglomerates, affiliates, parent corporations, or publicly held corporations owning 10% or more of its stock. Therefore, no further disclosure is required by Federal Rule of Civil Procedure 7.1.

II. Certificate of Interested Parties

1. Plaintiff Securities and Exchange Commission
2. Defendant Dean Vagnozzi
3. Brian Miller, Esq., Akerman LLP, counsel for Defendant Dean Vagnozzi
4. Alejandro Paz, Esq., Akerman LLP, counsel for Defendant Dean Vagnozzi
5. Defendant Complete Business Solutions Group, Inc.
6. Defendant Full Spectrum Processing, Inc.
7. Defendant ABetterFinancialPlan.com LLC
8. Defendant ABFP Management Company, LLC
9. Defendant ABFP Income Fund, LLC
10. Defendant ABFP Income Fund 2, L.P.
11. Defendant United Fidelis Group Corp.
12. Defendant Fidelis Financial Planning LLC
13. Defendant Retirement Evolution Group, LLC
14. Defendant Retirement Evolution Income Fund LLC
15. Defendant RE Income Fund 2, LLC
16. Defendant Lisa Mcelhone
17. Alan S. Futerfas, Esq., counsel for Defendant Lisa Mcelhone
18. Joel Hirschhorn, Esq., GrayRobinson, counsel for Defendant Lisa Mcelhone and Relief
Defendant The LME 2017 Family Trust
19. Defendant Joseph Cole Barleta
20. Bettina Schein, Esq., counsel for Defendant Joseph Cole Barleta
21. Andre Raikhelson, Esq., counsel for Defendant Joseph Cole Barleta

22. Defendant Joseph LaForte
23. Daniel Fridman, Esq., Fridman Fels & Soto, PLLC, counsel for Defendant Joseph LaForte
and Relief Defendant The LME 2017 Family Trust
24. James Froccaro, Esq., counsel for Defendant Joseph LaForte
25. Defendant Perry S. Abbonizio
26. Daniel Rashbaum, Esq, Marcus Neiman & Rashbaum LLP, counsel for Defendant Perry
S. Abbonizio
27. Jason Mays, Esq., Marcus Neiman & Rashbaum LLP, counsel for Defendant Perry S.
Abbonizio
28. Jeffrey Marcus, Esq., Marcus Neiman & Rashbaum LLP, counsel for Defendant Perry S.
Abbonizio
29. Defendant Michael Furman
30. Jeffrey Cox, Esq., Sallah Astarita & Cox, LLC, counsel for Defendant Michael Furman
31. James D. Sallah, Esq., Sallah Astarita & Cox, LLC, counsel for Defendant Michael Furman
32. Joshua Katz, Esq., Sallah Astarita & Cox, LLC, counsel for Defendant Michael Furman
33. Defendant John Gissas
34. Allison Kernisky, Esq., Holland & Knight LLP, counsel for Defendant John Gissas
35. Chad Vanderhoef, Esq., Holland & Knight LLP, counsel for Defendant John Gissas
36. Daniel Small, Esq., Holland & Knight LLP, counsel for Defendant John Gissas
37. Relief Defendant The LME 2017 Family Trust
38. ABFP Income Fund 3, LLC
39. ABFP Income Fund 4, LLC
40. ABFP Income Fund 6, LLC

41. ABFP Income Fund Parallel LLC
42. ABFP Income Fund 2 Parallel
43. ABFP Income Fund 3 Parallel
44. ABFP Income Fund 4 Parallel
45. ABFP Income Fund 6 Parallel
46. ABFP Multi-Strategy Investment Fund LP
47. ABFP Multi-Strategy Fund 2 LP
48. MK Corporate Debt Investment Company LLC
49. Ryan K. Stumphauzer, Esq., Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, Receiver
for the Receivership Entities
50. Timothy A. Kolaya, Esq., Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, counsel for
the Receiver
51. Gaetan Alfano, Esq., Pietragallo Gordon Alfano Bosick & Raspanti, LLP, counsel for the
Receiver
52. Douglas K. Rosenblum, Pietragallo Gordon Alfano Bosick & Raspanti, LLP, counsel for
the Receiver

Dated: September 15, 2020

Respectfully submitted,

AKERMAN LLP

Three Brickell City Centre, Suite 1100
98 Southeast Seventh Street
Miami, Florida 33131
Telephone: (305) 374-5600
Facsimile: (305) 374-5095

By: /s/ Brian P. Miller

Brian P. Miller, Esq.

Florida Bar No. 980633

E-mail: brian.miller@akerman.com

E-mail: Kelly.connolly@akerman.com

E-mail: kim.stathopoulos@akerman.com
Alejandro J. Paz, Esq.
Florida Bar No. 1011728
E-mail: Alejandro.paz@akerman.com
Secondary: marylin.herrera@akerman.com

Attorneys for Dean Vagnozzi

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of September 2020, a true and correct copy of the foregoing was served via the Court's CM/ECF System upon all counsel of record.

/s/Brian P Miller
Brian P Miller