UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

CASE NO.: 20-CIV-81205-RAR

vs.

COMPLETE BUSINESS SOLUTIONS GROUP, INC. D/B/A/ PAR FUNDING, ET AL.,

Defendants, et al.

JOHN GISSAS' AND RETIREMENT EVOLUTION DEFENDANTS' CORPORATE DISCLOSURE STATEMENT AND CERTIFICATE OF INTERESTED PARTIES

Defendants John Gissas, Retirement Evolution Group, LLC, Retirement Evolution Income Fund LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC (collectively, the "RE Defendants"), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 7.1 and the Court's August 17, 2020 Order Requiring Join Scheduling Report and Certificates of Interested Parties (ECF No. 164), submit this Corporate Disclosure Statement and Certificate of Interested Parties (the "Statement").¹

Corporate Disclosure Statement

The RE Defendants are not corporate entities and have no subsidiaries, conglomerates,

affiliates, parent corporations, or publicly held corporations owning 10% or more of stock.

Certificate of Interested Parties

- 1. Plaintiff Securities and Exchange Commission
- 2. Amie Riggle Berlin, Counsel for Plaintiff Securities and Exchange Commission

¹ The RE Defendants reserve the right to amend, correct, or supplement this Statement, as necessary.

- 3. Defendant John Gissas
- 4. Defendant Retirement Evolution Group, LLC
- 5. Defendant Retirement Evolution Income Fund LLC f/k/a RE Income Fund LLC
- 6. Defendant RE Income Fund 2, LLC
- 7. Daniel Small, Esq., Holland & Knight LLP, counsel for the RE Defendants
- 8. Allison Kernisky, Esq., Holland & Knight LLP, counsel for the RE Defendants
- 9. Christopher Iaquinto, Holland & Knight LLP, counsel for the RE Defendants
- 10. Chad Vanderhoef, Esq., Holland & Knight LLP, counsel for the RE Defendants
- 11. Defendant Complete Business Solutions Group, Inc.
- 12. Defendant Full Spectrum Processing, Inc.
- 13. Defendant ABetterFinancialPlan.com LLC
- 14. Defendant ABFP Management Company, LLC
- 15. Defendant ABFP Income Fund, LLC
- 16. Defendant ABFP Income Fund 2, L.P.
- 17. Defendant United Fidelis Group Corp.
- 18. Defendant Fidelis Financial Planning LLC
- 19. Defendant Lisa Mcelhone
- 20. Alan S. Futerfas, Esq., counsel for Defendant Lisa Mcelhone
- 21. Joel Hirchhorn, Esq., GrayRobinson, counsel for Defendant Lisa Mcelhone and

Relief Defendant The LME 2017 Family Trust

- 22. Defendant Joseph Cole Barleta
- 23. Bettina Schein, Esq., counsel for Defendant Joseph Cole Barleta
- 24. Andre Raikhelson, Esq., counsel for Defendant Joseph Cole Barleta
- 25. Defendant Joseph LaForte

26. Daniel Fridman, Esq., Fridman Fels & Soto, PLLC, counsel for Defendant Joseph LaForte and Relief Defendant The LME 2017 Family Trust

27. James Froccaro, Esq., counsel for Defendant Joseph LaForte

28. Defendant Perry S. Abbonizio

29. Daniel Rashbaum, Esq, Marcus Neiman & Rashbaum LLP, counsel for Defendant Perry S. Abbonizio

Jason Mays, Esq., Marcus Neiman & Rashbaum LLP, counsel for Defendant Perry
S. Abbonizio

Jeffrey Marcus, Esq., Marcus Neiman & Rashbaum LLP, counsel for Defendant
Perry S. Abbonizio

32. Defendant Michael Furman

33. Jeffrey Cox, Esq., Sallah Astarita & Cox, LLC, counsel for Defendant Michael

Furman

34. James D. Sallah, Esq., Sallah Astarita & Cox, LLC, counsel for Defendant Michael

Furman

35. Joshua Katz, Esq., Sallah Astarita & Cox, LLC, counsel for Defendant Michael

Furman

- 36. Defendant Dean Vagnozzi
- 37. Brian Miller, Esq., Akerman LLP, counsel for Defendant Dean Vagnozzi
- 38. Alejandro Paz, Esq., Akerman LLP, counsel for Defendant Dean Vagnozzi
- 39. Relief Defendant The LME 2017 Family Trust
- 40. RE Insured Income Fund, LLC
- 41. Retirement Evolution, LLC
- 42. Retirement Evolution Strategic Properties, LLC

43. Ryan K. Stumphauzer, Esq., Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, Receiver for the Receivership Entities

44. Timothy A. Kolaya, Esq., Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, counsel for the Receiver

45. Adam Foslid, Esq., Stumphauzer Foslid Sloman Ross & Kolaya, PLLC, counsel for the Receiver

46. Gaetan Alfano, Esq., Pietragallo Gordon Alfano Bosick & Raspanti, LLP, counsel for the Receiver

47. Douglas K. Rosenblum, Pietragallo Gordon Alfano Bosick & Raspanti, LLP, counsel for the Receiver

Dated: September 15, 2020.

Respectfully submitted,

HOLLAND & KNIGHT LLP 701 Brickell Avenue, Suite 3300 Miami, Florida 33131 Tel: (305) 374-8500 Fax: (305) 789-7799

By: <u>/s/ Allison Kernisky</u> Daniel I. Small (FBN 42579) <u>Daniel.Small@hklaw.com</u> Christopher Iaquinto <u>Christhopher.iaquinto@hklaw.com</u> *Pro hac vice* application forthcoming Allison Kernisky (FBN 41160) <u>Allison.Kernisky@hklaw.com</u> Chad M. Vanderhoef (FBN 109595) Chad.Vanderhoef@hklaw.com

Counsel for Defendants John Gissas, Retirement Evolution Group, LLC, Retirement Evolution Income Fund, LLC f/k/a RE Income Fund LLC, and RE Income Fund 2, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 15, 2020, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Allison Kernisky Allison Kernisky