

**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.,**

SECURITIES AND EXCHANGE COMMISSION'S NOTICE OF FILING

Plaintiff hereby files an exhibit list showing all exhibits and rebuttal exhibits admitted during the preliminary injunction hearing held on August 18, 2020 and continued on August 21, 2020 and referred to in the Plaintiff's Statement of Undisputed Facts (DE 816).

This list contains the exhibit number and DE number for the court's convenience. The exhibit numbers referred to in the Statement of Undisputed Facts are highlighted in yellow. The list contains all docket entries in the possibility that Plaintiff and Defendants refer to them in any response or reply.

October 6, 2021

Respectfully submitted,

By: s/ Amie Riggle Berlin
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**SECURITIES AND EXCHANGE
COMMISSION**

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**UNITED STATES DISTRICT COURT
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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
AND AUGUST 21, 2020 PRELIMINARY INJUNCTION HEARING AND REFERRED
TO IN THE STATEMENT OF UNDISPUTED FACTS**

NUMBER	DESCRIPTION
Ex. 1 DE 20	PA Business Records for Full Spectrum
Ex. 2 DE 20-1	March 5, 2020 Deposition Transcript, LaForte
Ex. 3 DE 20-2	June 30, 2020 Deposition Transcript, CBSG
Ex. 4 DE 20-3	February 11, 2020 30b6 Deposition Transcript, CBSG
Ex. 5 DE 41-1	SEC Attestation, Full Spectrum not registered

NUMBER	DESCRIPTION
Ex. 6 DE 20-4	Corporate records of CBSG
Ex. 7 DE 20-5	Fictitious name filing, CBSG dba Par Funding
Ex. 8 DE 20-6	Nov 28, 2018 PA Order against CBSG
Ex. 9 DE 20-7	December 2018 NJ Order against CBSG
Ex. 10 DE 41-2	SEC Attestation, CBSG not registered
Ex. 11 DE 41-3	CBSG Form D 2020
Ex. 12 DE 21	McElhone Linked In Page
Ex. 13 DE 21-1	Declaration of Melissa Davis
Ex. 14 DE 21-2	Oregon Cease and Desist Order against McElhone
Ex. 15 DE 41-4	SEC Attestation regarding McElhone not registered
Ex. 16 DE41-5	SEC Attestation regarding Cole not registered
Ex. 17 DE 21-3	December 5, 2019 Deposition of LaForte

NUMBER	DESCRIPTION
Ex. 18 DE 21-4	Declaration of Kara DePietro
Ex. 19 DE 21-5	Declaration of Michael Foti
Ex. 20 DE 41-7	Transcript of Nov 2019 Sales Dinner Dec of Ed Horner
Ex. 21 DE 41-6	SEC Attestation re Joseph LaForte not registered
Ex. 22 DE 22	Jed Foret Declaration of Perry Abbonizio address
Ex. 23 DE 41-8	SEALED DOCUMENT
Ex. 24 DE 41-9	Texas State Board Deposition of Gary Beasley
Ex. 25 DE 41-10	Rene Meyer Declaration
Ex. 26 DE 41-11	SEC Attestation re Abbonizio not registered
Ex. 27 DE 22-1	Declaration of Christine Rainwater - November 6, 2018 email from "Joe Mack."
Ex. 28 DE 22-2	Declaration of Michelle Rago - December 3, 2019 email from Joe Mack to Michelle Rago
Ex. 29 DE 22-3	PA Certified records for A Better Financial Plan Capital Management, LLC
Ex. 30	Certified records for abetterfinancialplan.com, LLC.

NUMBER	DESCRIPTION
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Ex. 31 DE 22-5	Certified court record of Information, Plea, and Sentencing papers for NY criminal case against LaForte, for which he was sentenced in 2007
Ex. 32 DE 22-6	LaForte CRD
Ex. 33 DE 22-7	LaForte's Criminal Plea in NJ Fed Case
Ex. 34 DE 22-8	LaForte Criminal Sentencing in NJ Case
Ex. 35 DE 22-9	Declaration of Ray Andjich - FBOP Inmate Locator for LaForte
Ex. 36 DE 22-10	Abbonizio FINRA Certified CRD
Ex. 37 DE 23	TX Cease and Desist Order
Ex. 38 DE 23-1	List of ABFP Investment Fund Investors Undated ABFP Income Fund Investors - V Jacqmein Dec
Ex. 39 DE 23-2	Certified Delaware Records for ABFP Investment Fund
Ex. 40 DE 41-12	November 15, 2018 Testimony Transcript of Dean Vagnozzi
Ex. 41 DE 23-3	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 DE 23-4	Declaration of Jeramy Heintz - ABFP Management Services Agreement Agreement with Merchant Growth saying ABFP Mgmt is manager co

Ex. 43 DE 23-5	Parfunding Website-V Jacq Dec
Ex. 44 DE 23-6	Declaration of Michael Foti
Ex. 45 DE 23-7	Pa_Certfi. State_abetterfinancialplan.com LLC _6.29.20
Ex. 46 DE 23-8	Declaration of V Jacqmein - abetterfinancialplanning.com website - ABPF Website
Ex. 47 DE 41-13	ABFP.comLLC SEC Attestation not registered
Ex. 48 DE 41-18	ABFP Management SEC Attestation not registered
Ex. 49 DE 41-15	ABPF Income Fund LLC SEC Attestation not registered
Ex. 50 DEE 41-16	ABFP Income Fund 2, LP Form D
Ex. 51 DE 241-17	RE Income Fund LLC Form D
Ex. 52 DE 41-19	ABFP Income Fund LLC Form D
Ex. 53 DE 24-3/24-4	PADOBS Dec - ABFP Finders Agreement with CBSG
Ex. 54 dE 24-5	Retirement Evolution LLC Form D
Ex. 55 DE 24-6	ABFP Income Fund 2 PPM - V Jacqmein Dec

Ex. 56 DE 41-20	ABFP Form D
Ex. 57 DE 24-8	Certified PA order against Vagnozzi/ABFP
Ex. 58 DE 27/41-20	Retirement Evolution Income Fund LLC Form D
Ex. 59 DE 27-1	RE Income Fund, LLC PPM pulled from enjoyretirement website
Ex. 60 DE 27-2	February 2018 email from Vagnozzi to Abbonizio - V Jacqmein dec
Ex. 61 DE 27-3	Fidelis Financial Planning LLC Dec of V Jacqmein - FFP MCA Fidelis Fund Client PPM
Ex. 62 DE 41-22	Declaration of Gary DeLucco - Fidelis PPM
Ex. 63	Omitted
Ex. 64 DE 27-5/41-23	Form D for Fidelis D and D-A
Ex. 65 DE 27-6	Declaration of Ray Andjich- Furman CPA License record
Ex. 66 DE 27-7	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 DE 27-8	Declaration of Ray Andjich- Par Funding web capture

Ex. 71 DE 27-9	Par Funding Note-Jack Terzi Complaint
Ex. 72 27-10	Omitted
Ex. 73 DE 27-11	Declaration of Ray Andjich Court Search
Ex. 74 DE 27-12	Declaration of Crystal Ivory
Ex. 75 DE 28/41-24	2019 CBSG Form D
Ex. 76 DE 28-1	Expert report of Charles S. Lunden,
Ex. 77 DE 28-2	PADOBS Dec - Jan 2018 PA Subpoena
Ex. 78 DE 28-3	PADOBS Dec - Composite of Finders Agreements
Ex. 79 DE 28-4	PADOBS Dec - CBSG Chart showing investors by Finder and how much they raised
Ex. 80 DE 28-5	2018-05-21 Email from Michelle Price to Donna Iannuzzi re abfp starts other funds
Ex. 81 DE 28-6	LaForte Linked In Page
Ex. 82 DE 28-7	LaForte Twitter Page
Ex. 83	Forbes profile for LaForte

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Ex. 84 DE 28-9	Composite of LaForte's Forbes articles
Ex. 85 DE 28-10	Declaration of Chad Frost
Ex. 86 DE 28-11	Declaration of Jim Frost
Ex. 87 DE 28-12	Fidelis and United Fidelis Corporate Documents
Ex. 88 DE 28-13	PADOBS Dec -CBSG Response to PADOBS Subpoena
Ex. 89 DE 28-14/28-15	PADOBS Dec Security Agreements and Promissory Notes to PADOBS
Ex. 90 DE 28-16	PADOBS Dec CBSG Amended and Restated Note Purchase Agreement-TX
Ex. 91 DE 28	Declaration of Julie Caricato
Ex. 92 DE 29-1	Declaration of Mary Carleton
Ex. 93 DE 29-2	Declaration of Pamela A Fleetwood
Ex. 94. DE 29-3	Declartion of Robert L. Fleetwod
Ex. 95	Declaration of JR Harrison

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Ex. 96 DE 29-5	Declaration of Eric Husebo
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Ex. 98 DE 29-7	Declaration of Loniese Jones
Ex. 99 DE 29-8	Declaration of Julie Katz
Ex. 100 DE 29-9	Declaration of Bruce McNider
Ex. 101 DE 20	Declaration of Ronald Lipowski
Ex. 102 DE 30-1	Declaration of Joseph Pucci
Ex. 103 DE 30-2	Declaration of Marc A. Reijken
Ex. 104 DE 30-3	Declaration of Steven Weinkranz
Ex. 105 DE 30-4	Declarations of Sean Whalen
Ex. 106 DE 30-5	Declaration of Gianna Wolfe
Ex. 107	PA Corporate Records for Par Funding

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Ex. 108 DE 30-7	Camaplan documents
Ex. 109 DE 41-25	Declaration of Brad Beebe
Ex. 110 DE 31	Declaration of Jeramy Heintz Texas Agent Guide
Ex. 111 DE 31-1	Merchant Site Inspection Report
Ex. 112 DE 31-2	SEC Form D Website forms and instructions
Ex. 113 DE 31-3	Fidelis Financial Planning LLC PPM Declaration of V Jacqmein
Ex. 114 DE 31-4	Declaration of V Jacqmein - Gisas Par Funding email
Ex. 115 DE 31-5	Gissas note par funding abfp wire - Declaration of V Jacqmein
Ex. 116 DE 31-6	Joe Mack and Vag talking about their roles - V Jacqmein Dec
Ex. 117 DE 31-7	Par Funding sending notes to gissas Dec of V Jacqmein
Ex. 118 DE 31-8	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

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Ex. 120 DE 31-10	2018.01.09 Abbonizzio Vagnozzi Westhead Furman MCA Paperwork Meyers - Dec V Jacqmein
Ex. 121 DE 31-11	2018.01.30 Furman Perry Vagnozzi Anita need update on new not for meyer - Declaration of V Jacqmein
Ex. 122 DE 31-12	Exhibit 21 - 2016.11.28 Vagnozzi Roshelli Gentilotti Huesser McNally MCA-V Jacqmein Dec
Ex. 123 DE 31=13	7-6-18vagnozzi; perry abbonizio 7-10-18 Note
Ex. 124 DE 31-14	SEALED DOCUMENT
Ex. 125 DE 31-15	SEALED DOCUMENT
Ex. 126 DE 32	SEALED DOCUMENT
Ex. 127 DE 41-26	SEALED DOCUMENT
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Ex. 129 DE 32-1, 32-2 and 32-3	SEALED DOCUMENT
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Ex. 131	CBSG Financial Statements - 12.31.2017

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Ex. 132 DE 41-29	SEALED DOCUMENT
Ex. 133 DE 41-30	SEALED DOCUMENT
Ex. 134 DE 41-31	SEALED DOCUMENT
Ex. 135 DE 41-32	SEALED DOCUMENT
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Ex. 137 DE 33-1	Transcript of A Better Financial Plan Very Happy Clients – Milord Dec
Ex. 138 DE 33-2	Transcript of Bill Bromleey Meltdown – Milord Dec
Ex. 139 DE 33-3	Transcript of A Better Financial Plan Ideal Investment Video – Milord Dec
Ex. 140 DE 33-4	SEALED DOCUMENT
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Ex. 143	Transcript of Email-1C Link Video- Milord Dec

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Ex. 144 DE 33-7	Transcript of A Better Financial Plan Unbranded Video – Milord Dec
Ex. 145 DE 41-34	FORM D RE Income Fund 2
Ex. 146 DE 33-9	SEALED DOCUMENT
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Ex. 149 DE 41-35	Transcript of Zoom Video-GMT20200419-135006 Deqar John – Milord Dec
Ex. 150 DE 34	Transcript of Vagnozzi Viimeo – Milord Dec
Ex. 151 DE 41-36	Transcript of Vagnozzi and Pauciulp Video – Milord Dec
Ex. 152 DE 34-1	SEALED DOCUMENT
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Ex. 155	Transcript of Recording -6 Advertisement Recording – Milord Dec

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Ex. 156 DE 34-5	SEALED DOCUMENT
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Ex. 158 DE 35	Transcript of ABFP April 6, 2020 Zoom Call – Milord Dec
Ex. 159 DE 41-37	March 26, 2019 Deposition Transcript of Dean Vagnozzi
Ex. 160 DE 35-1	SEC C&D Order Against Abetterfinancialplan.com and Vagnozzi
Ex. 161 DE 35-2	Gissas S Fla Investors – Dec of V Jacqmein
Ex. 162 DE 35-3	RE Income Fund 2 LLC PPM
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Ex. 164 DE 35-5	1-11-18 DV email to agents about fund model
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Ex. 168 DE 177-2	Composite of Photos of Par Funding
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Ex. 170 DE 177-4	6/27/16 Email from Phillip Mowry to Dean Vagnozzi re MCA Update
Ex. 171 DE 177-5	2/27/17 Email from Phillip Mowry to Dean Vagnozzi re MCA Dinner
Ex. 172 DE 177-6	5/5/17 Email from Steve Cushmore to Dean Vagnozzi re Perry
Ex. 173 DE 177-7	10/26/17 Email from Shannon Westhead to sz32836@yahoo.com cc Abbonizion and Vagnozzi re Flying to Philadelphia
Ex. 174 DE 177-8	11/21/17 at 5:42 pm Email from Frank Andrews to Vagnozzi re Perry meeting you in DE – indeed he is
Ex. 175 DE 177-9	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 DE 177-10	12/11/17 Email from Alexis Abbonizio to Shannon Westhead re MCA DEC Updates
Ex. 177 DE 177-11	12/14/17 Email from Joe Mack to Vagnozzi and Joe Cole re proof of Commissions
Ex. 178 DE 177-12	12/14/17 Email from Joe Mack to Vagnozzi re Also
Ex. 179	Fleetwood Services, LLC et al v Complete Business Solutions Group,, Inc. d/b/a Par Funding, et al Case No. 18-cv-00268 (E.D. PA)

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Ex. 180 DE 177-14	1/24/18 Email from Joe Mack to Vagnozzi re Legal Settlement
Ex. 181 DE 177-15	4/3/18 Email from Vagnozzi to Joe Cole and Alexis Abbonio re 2 nd Fund
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Ex. 183 DE 177-17	CBSG (HMC) Chart
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Ex. 195 DE 177-29	Retirement Evolution spreadsheet
Ex. 196 DE 177-30	Declaration of Christopher McMorrow
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Ex. 202 DE 177-37	Fleetwood Second Amended Complaint
Ex. 203 DE 177-38	Declaration of Robert Stoller

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Ex. 205 DE 177-40	Declaration of Joseph Greenberg
Ex. 206 DE 177-41	Declaration of Richard Muldawer
Ex. 207 DE 177-42	Declaration of Karen Smith
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Ex. 209 DE 177-44	CBSG & Related LLC Purchase Fund Transfer 8-13-20
Ex. 210 DE 177-45	Voicemail of Robert Hawrylak
Ex. 211 DE 177-46	Declaration of David Gollner
Ex. 212 DE 177-47	Declaration of Francis Cassidy
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Ex. 214 DE 177-49	Declaration of Mark Nardelli
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Ex. 216 DE 177-51	Declaration of Raymond Andjich

Ex. 217 DE 177-52	Declaration of James Klenk
Ex. 218 DE 290-2	Declaration of Giannina Baldwin
Ex. 219 DE 290-3	ABFP Press Release - Vagnozzi
Ex. 220 DE 290-4	Declaration of Joseph Jason Rotunda – PAR
Ex. 221 DE 290-5	Email with Legal Insurance Email
Ex. 222 DE 290-6	Aida Lau 6/29/20 Depo Transcript
Ex. 223 DE 290-7	7/16/20 Email
Ex. 224 DE 290-9	Declaration of Melissa Davis
Ex. 225 DE 290-9	Declaration of Andy McKinley
Ex. 226 DE 290-10	Declaration of Lori Boyogueno
Ex. 227 DE 290-11	Terzi Answer
Ex. 228 DE 290-12	Notice of Taking Depositions and Cole's Nonappearance Certificate
Ex. 229 DE 290-13	Vanozzi Due Diligence

Ex. 230 DE 290-14	Vagnozzi Euler Hernes Letter 7/21/19
Ex. 231 DE 290-15	Vagnozzi Depo Transcript 8/5/20
Ex. 232 DE 290-16	Vagnozzi Depo Transcript 8/6/20
Ex. 233 DE 290-17	Redacted Statement
Ex. 234 DE 290-18	Declaration of Ariel Benjamin (Ben) Mannes
Ex. 235 DE 290-19	Davis Deposition Notice
Ex. 236 DE 290-20	Vagnozzi's Admissions
Ex. 237 DE 290-21	Bloomberg Article