

**Plaintiff's Witness List**

**Will Call**

1. Perry S. Abbonizio  
c/o Jeffrey Marcus, Esq.  
Jason L. Mays, Esq.  
Marcus Neiman Rashbaum & Pineiro LLP  
2 South Biscayne Blvd., Suite 1750  
Miami, FL 33131  
Telephone 305-400-4260

He will testify regarding Par Funding, its promissory note offerings, the use of agent fund managers and sales agents, the formation of agent funds and creation of offering materials, and how the investment was offered and sold. Direct-2.5 hours. Cross – 2.5 hours.

2. Alexis Abbonizio  
c/o Annabelle Nadler, Esq.  
Jeffrey S. Weiner P.A.  
Two Datan Center, Suite 1910  
9130 South Dadeland Blvd.  
Miami, FL 33156  
Telephone: 305-985-6640

She will testify about Michael Furman's role in the Par Funding offerings, the promissory notes, marketing materials, and agent funds. Direct 1 hour. Cross – 1 hour.

3. Robert Renner  
[REDACTED]  
West Palm Beach, FL 33417  
Telephone: [REDACTED]

Investor. He will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment. Direct 1 hour. Cross 1 hour.

4, Michael C. Furman  
c/o Zachary P. Hyman, Esq.  
Millennial Law, Inc.  
501 E. Las Olas Blvd., Suite 200/308  
Fort Lauderdale, FL 33301  
Telephone: 954-271-2719

Defendant will testify about the facts relevant to the claims alleged against him, the Par Funding offerings, Fidelis, ABFP Management, ABFP and its related funds, marketing the offerings, and his conduct in connection with the offer and sale of notes of Par Funding, Fidelis, ABFP, and other issuers. Direct 2.5 hours. Cross 2.5 hours.

5. John Murray  
FBI  
600 Arch Street  
Philadelphia, PA 19106  
Telephone: 215-418-4000

He will authenticate recordings and videos the FBI made.  
Direct 30 mins. Cross 1 hour.

6. Mark Reikes  
[REDACTED]  
West Palm Beach, FL 33414  
Telephone: [REDACTED]

Investor who will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment.  
Direct 1.5 hour. Cross 1.5 hour.

7. Brad Sharp (DSI)  
c/o Tim Kolaya, Esq.  
Stemphauzer Foslid Sloman Ross & Kolaya, PLLC  
2 South Biscayne Blvd., Suite 1600  
Miami, Florida 33131  
Telephone: 305-614-1400

He will testify about Par Funding, ABFP, and United Fidelis/Fidelis, Par Funding business generally, and matters reflected in Par Funding, ABP, and United Fidelis/Fideli documents.  
Direct 1 hour. Cross 1.5 hour.

8. Stephen A. Bouchard, Director of Examinations (by Zoom)  
New Jersey Bureau of Securities  
Office of the New Jersey Attorney General  
153 Halsey St., 6th floor  
Newark, NJ 07102  
Telephone: 973-504-3643

He will testify regarding the Order entered by New Jersey Bureau of Securities and whether the NJBS engaged in the conduct and made the statements Furman claimed. Direct 45 mins. Cross - 2 hours.

**May Call**

9. Lori Boyogueno (by Zoom)  
Senior Securities Compliance Examiner and Enforcement Administrator

Pennsylvania Department of Banking and Securities  
Bureau of Securities Compliance and Examinations  
17 North 2<sup>nd</sup> St., Suite 1300  
Harrisburg, PA 17101  
Telephone: 717-783-4241

She will testify regarding the Orders entered by the Pennsylvania Dept. of Banking and Securities that are alleged in the Complaint. Direct 45 mins. Cross – 2 hours.

10. Melissa Davis (expert witness)  
c/o Amie Berlin, Esq.  
Securities and Exchange Commission  
801 Brickell Ave., Suite 1950  
Miami, FL 33131  
Telephone: 305-982-6322

She will testify about financial aspects of the securities offerings and sales of Par Funding, Fidelis, and ABFP, including the notes issued, exchanged, and the flow and amount of funds transferred. Direct 1 hour. Cross 1 hour.

11. Stephen Decker  
[REDACTED]  
Miami, Florida, 33193

Investor. He will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment s. Direct 1 hour. Cross 1 hour.

12. Joseph Gassman  
c/o Brian P. McVan, Esq.  
McVan & Weidenburner  
162 S. Easton Rd.  
Glenside, PA 19038  
Telephone: 215-884-6800

Agent fund manager. He will testify about the Par Funding offering, role of agent funds, role of ABFP management, Furman, and the offer and sale of securities in connection with the offerings. Cross 1 hour.

13. Renee Meyer  
[REDACTED]  
Palm City, FL 34990  
Telephone: [REDACTED]

Investor. She will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment. Direct 1 hour. Cross 2.5 hours.

14. William Robert Mitchell, Certified Fraud Examiner  
Texas State Securities Board  
Thomas Jefferson Rusk State Office Building  
208 E. 10th St.  
Austin, TX 78701  
Telephone: 512-305-8301

He will testify regarding the investigation by Texas State Securities Board and the related Emergency Cease and Desist Order. Direct 1 hour. Cross 3 hours.

15. James Klenk  
c/o Tim Kolaya, Esq.  
Stemphauzer Foslid Sloman Ross & Kolaya, PLLC  
2 South Biscayne Blvd., Suite 1600  
Miami, Florida 33131  
Telephone: 305-614-1400

He will testify as to amounts of Notes sold by Furman and his companies, transfer of funds to Par Funding from Furman and his companies, and Par Funding's loans in default. Direct 45 minutes. Cross 2 hours.

16. Crystal Ivory, Accountant  
c/o Amie R. Berlin, Esq.  
Securities and Exchange Commission  
801 Brickell Ave., Suite 1950  
Miami, FL 33131  
Telephone: 305- 982-6322

SEC accountant. She would testify about Par Funding's lawsuits against borrowers/merchants in default on the loans. Direct 30 minutes. Cross 2 hours.

17. Dean J. Vagnozzi  
c/o Brian Miller, Esq.  
Alejandro Paz, Esq.  
Akerman LLP  
Three Brickell City Center  
98 Southeast Seventh St.  
Miami, FL 33131  
Telephone: 305-374-5600

He may testify regarding CBCG is organized, Furman's work in connection with the offerings, solicitation efforts, and how notes were sold and offerings managed. Direct-2.5 hours. Cross 2 hours.

18. Victoria Villarose

[REDACTED]  
Philadelphia, PA 19107

Telephone: [REDACTED]

Former head of underwriting at Par Funding, she may testify about Par Funding, the structure and management of Par Funding, and the onsite inspections and underwriting. Direct 1 hour-  
Cross 2 hours.

19. Wendy Furman Lyman

[REDACTED]  
Philadelphia, PA 19107

Telephone: [REDACTED]

Former head of underwriting at Par Funding, she may testify about Par Funding, the structure and management of Par Funding, and the onsite inspections and underwriting. Direct 1 hour-  
Cross 2 hours.

20. Eugene Sheldon

[REDACTED]  
West Palm Beach, FL 33411

Investor. He will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment. Direct 1 hour. Cross 1 hour.

21. Gary P. DeLucco

[REDACTED]  
Jupiter, FL 33477

Telephone: [REDACTED]

Investor. He will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment. Direct 1.5 hours. Cross 1.5 hours.

22. Henry Barth

c/o Jeffrey Schneider, Esq.  
Levine, Kellogg, Lehman, Schneider & Grossman LLP  
201 South Biscayne Boulevard, 22<sup>nd</sup> Floor  
Miami, FL 33131  
Telephone: 305-403-8799

Investor. He will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment.  
Direct 1 hour. Cross 1 hour.

23. Nicholas Sandoval

[REDACTED]  
Jensen Beach, FL 34957-2449  
[REDACTED]

Investor. He will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment.  
Direct 1 hour. Cross 1 hour.

24. Frank L. Nash

[REDACTED]  
Jupiter, FL

Phone: [REDACTED]

Email: [REDACTED]

Investor. He who will testify about Furman, interactions with Furman, what was said and occurred in the offer and sale of the investment, and events and discussions surrounding the investment. Direct 1 hour. Cross 1 hour.

Any witness on Defendant's witness list previously disclosed in discovery.