

United States District Court

SOUTHERN DISTRICT OF FLORIDA

Case Number: 20-CV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS

GROUP, INC. d/b/a PAR FUNDING, et al.,

Defendants.

DEFENDANT, MICHAEL C. FURMAN’S, EXHIBIT LIST

PLAINTIFF'S ATTORNEY Amie Riggle Berlin, Alise Johnson				DEFENDANT'S ATTORNEY Zachary P. Hyman, Elroy John	
COURT REPORTER				CGraciela GomezOURTROOM DEPUTY Graciela Gomez	
DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESS	PLAINTIFF'S OBJECTION(S)
D-0005				Par Funding Corporate Overview (Attachment to D-0005)	
D-0006				CBSG Funding Analysis - January 2013 through January 2017	
D-0010				CBSG Funding Analysis - January 2013 through January 2018 (attachment to D-0009)	
D-0012				CBSG Funding Analyais - January 2013 through January 2018 (attachment to D-0011)	
D-0016				(Attachment to D-0015)	
D-0018				(Attachment to D-0017)	
D-0027				(Attachment to D-0026)	
D-0028				E-mail from Michelle Price to Listserv re CBSG Funding Analysis dated March 13, 2018	
D-0029				(Attachment to D-0028)	

D-0032				Email Dated March 4, 2019	
D-0034				E-mail from Joe Cole to Listserv re CBSG Funding Analysis dated March 12,	
D-0035				(Attachment to D-0034)	
D-0044				(Attachment to D-0043)	
D-0047				CBSG Financials Frei Communication	
D-0048				CBSG Funding Analysis - January 2013 through April 2016	
D-0055				E-mail from Michelle Price to Listserv regarding CBSG Funding Analysis dated May 9, 2018	
D-0057				(Attachment to D-0056)	
D-0058				(Attachment to D-0055)	
D-0060				(Attachment to D-0059)	
D-0061				Chehebar Financials Feedback	
D-0065				E-mail from Alexis Abbonizio to Listserv re CBSG Funding Analysis dated June 10, 2018	
D-0066				(Attachment to D-0065)	
D-0069				E-mail from Michelle Price to Listserv re CBSG Funding Analysis dated June 11, 2018	
D-0070				(Attachment to D-0069)	
D-0073				(Attachment to D-0072)	
D-0074				E-mail from Joe Cole to Listserv and Perry Abbonizio re CBSG Funding Analysis dated June 11, 2020	
D-0075				(Attachment to D-0074)	
D-0076				CBSG Management Reviewed Financials 2018 – 2019	
D-0081				CBSG-Receiver-000588732	
D-0083				(Attachment D-0082)	
D-0087				(Attachment to D-0086)	

D-0089				June Funding Analysis (Attachment to D-0088)	
D-0090				June 2020 Funding Analysis KPI	
D-0091				E-mail from Cole to Abbonizio, attaching funding analysis and other materials, dated August 15, 2016	
D-0092				(Attachment to D-0091)	
D-0095				(Attachment to D-0094)	
D-0098				(Attachment to D-0097)	
D-0100				(Attachment to D-0099)	
D-0108				(Attachment to D-0108)	
D-0117				(Attachment to D-0116)	
D-0121				(Attachment to D-0120)	
D-0124				(Attachment to D-0123)	
D-0127				Email from Jerry Nave to Mark Nardelli, dated December 1, 2017, attaching funding analysis and other materials	
D-0128				CBSG-Receiver-000582861	
D-0130				E-mail from Michelle Price to Listserv re CBSG Funding Analysis dated November 14, 2018	
D-0131				(Attachment to D-0130)	
D-0132				E- mail from Mike Tierney to Alexis Abbonizio re CBSG Funding Analysis dated November 30, 2018	
D-0134				(Attachment to D-0133)	
D-0161				(Attachment to D-0160)	
D-0175				REA Funding Analysis Review Report	
D-0196				036 CHEHEBARS Kaufman CPA Audit 100616	
D-0197				037 CHEHEBARS Kaufman CPA Loan 030117	
D-0202				Email from Cole to several recipients, attaching CBSG Investor Materials	
D-0226				CBSG-ReceiverNative-000395680	

D-0227				ABFP Presentation Deck 11/21/19	
D-0233				Bybel Rutledge Correspondence	
D-0242				Bybel Rutledge Correspondence	
D-0245				Bybel Rutledge Correspondence	
D-0259				CBSG Fidelis Financial Planning LLC - Purchase Agreement 10/15/18	
D-0330				Email from Zingarelli to Abbonizio, dated December 26, 2018, attaching Par Corporate Overview	
D-0331				Email from Zingarelli to Abbonizio and others, dated March 18, 2020, attaching Par Corporate Overview	
D-0332				Email from Abbonizio to Hepworth, subject line "CBSG Overview," dated July 10, 2017, attaching a draft overview	
D-0333				Email from Abbonizio to Hepworth, subject line "Revised CBSG Overview," dated August 1, 2017, attaching a revised draft overview	
D-0334				E-mail from A. Abbonizio to P. Abbonizio, dated October 29, 2017, forwarding email from Cole	
D-0350				Vagnozzi "Agent Fund Guide"	
D-0353				E-mail from Dean Vagnozzi to Steve Wittmer dated September 16, 2016	
D-0642				Expert Report of Melissa Davis dated August 13, 2021 (ECF 803-1)	
D-0643				Expert Rebuttal Report of Joel Glick dated August 27, 2021 (ECF 803-2)	
D-0644				CBSG Funding Analysis KPI 0519 CBSG-Receiver (ECF 804-03)	
D-0647				Expert Report by Melissa Davis CPA, (ECF 804-13)	
D-0649				Write Off Policy Procedures	
D-0660				July 2019 Letter from Cole to Vagnozzi (ECF 804-29)	

D-0673				Joel Glick Expert Rebuttal Report, (ECF 824-2)	
D-0675				Declaration of Joe Cole Dated October 28, 2021 and Exhibits (Ex. D part 1) (ECF 893-04)	
D-0676				Declaration of Joe Cole Dated October 28, 2021 and Exhibits (Ex. D part 2) (ECF 893-05)	
D-0677				Form D (Ex. F) (ECF 893-07)	
D-0684				DePietro Emails	
D-0751				EPROD-SEC-DEF-000058601	
D-1135				Bybel Rutledge Correspondence	
D-1772				Underwriting Checklist	
D-1773				Client Checklist	
D-1774				Site Inspections	
D-1775				FRB MCA Approval Study	
D-1777				CBSG Underwriting Merchant Declarations Chart	
D-1795				Amended Complaint (ECF 119) (Exhibit 1 to 30(b)(6) Depo)	
D-1796				Glick Declaration July 13, 2021	
D-1797				FASB Default Guidance	
D-1798				IRS Guidance	
D-1799				Wetizel IRS Response Letter	
D-1800				REA Weitzel Email 112719	
D-1802				REA Weitzel Email 011720	
D-1803				CLA Default Analysis CLA0000049	
D-1810				CLA Change In Auditors	
D-1813				Jeffries Correspondence	
D-1823				June Funding Analysis	
D-1842				Clark insurance confirmation letter to Friedman	
D-1847				Policy Document – prohibition of offering policy to merchants P9	

D-1851				Notice of Deposition of SEC Pursuant to Rule 30(b)(6) (Exhibit 3 to 30(b)(6) Depo)	
D-1852				CBSG Form D Filing	
D-1863				Correspondence with General Counsel	
D-1865				MCA White Paper	
D-1868				Testa Heck Opinion	
D-1869				FRB MCA Publication 2019	
D-1873				DLA Analysis of Notes	
D-1879				Undercover Investor Transcript	
D-1882				Hewitt NJBOS Correspondence	
D-1884				Bybel Rutledge & Hewitt Referral Correspondence	
D-1885				Hewitt Referral Engagement Correspondence	
D-1886				Bybel Rutledge Correspondence	
D-1887				Perry FINRA	
D-1888				SEC FORM D.Feb2019 (Exhibit 4 to 30(b)(6) Depo)	
D-1889				SEC FORM D - April 2020 (Exhibit 5 to 30(b)(6) Depo)	
D-1890				Expert Report of Joel Glick Dated August 13, 2021	
D-1892				Friedman Audit (Page 13)	
D-1894				Initial and Modified Reg D Filing	
D-1895				Investor List trying re Amended Reg D Filing	
D-1900				(Exhibit 6 to 30(b)(6) Depo)	
D-1901				(Exhibit 7 to 30(b)(6) Depo)	
D-1902				(Exhibit 8 to 30(b)(6) Depo)	
D-1903				(Exhibit 18 to 30(b)(6) Depo)	
D-1904				(Exhibit 18A to 30(b)(6) Depo)	

D-1905			(Exhibit 19 to 30(b)(6) Depo)	
D-1906			(Exhibit 20 to 30(b)(6) Depo)	
D-1907			(Exhibit 21 to 30(b)(6) Depo)	
D-1908			(Exhibit 22 to 30(b)(6) Depo)	
D-1909			(Exhibit 23 to 30(b)(6) Depo)	
D-1910			(Exhibit 24 to 30(b)(6) Depo)	
D-1911			(Exhibit 25 to 30(b)(6) Depo)	
D-1912			(Exhibit 27 to 30(b)(6) Depo)	
D-1913			(Exhibit 28 to 30(b)(6) Depo)	
D-1914			(Exhibit 29 to 30(b)(6) Depo)	
D-1915			(Exhibit 30 to 30(b)(6) Depo)	
D-1916			(Exhibit 31 to 30(b)(6) Depo)	
D-1917			(Exhibit 44 to 30(b)(6) Depo)	
D-1918			(Exhibit 61 to 30(b)(6) Depo)	
D-1919			(Exhibit 62 to 30(b)(6) Depo)	
D-1920			(Exhibit 63 to 30(b)(6) Depo)	
D-1921			(SEC Exhibit 66 to Rutledge Depo)	
D-1922			(Exhibit 67 to 30(b)(6) Depo)	
D-1923			(Exhibit 68 to 30(b)(6) Depo)	
D-1924			(SEC Exhibit 69 to Rutledge Depo)	
D-1925			(Exhibit 100 to 30(b)(6) Depo)	
D-1926			(Exhibit 101 to 30(b)(6) Depo)	
D-1927			(Exhibit 102 to 30(b)(6) Depo)	
D-1928			(Exhibit 103 to 30(b)(6) Depo)	
D-1930			(Exhibit 104 to 30(b)(6) Depo)	
D-1931			(Exhibit 105 to 30(b)(6) Depo)	
D-1932			(Exhibit 106 to 30(b)(6) Depo)	

D-1933			(Exhibit 107 to 30(b)(6) Depo)	
D-1934			(Exhibit 108 to 30(b)(6) Depo)	
D-1935			(Exhibit 109 to 30(b)(6) Depo)	
D-1950			Bybel Rutledge Opinion re Note Purchase Agreements with ABFP Income, dated July 24, 2019	
D-1951			Email from Benjamin Goodman to Timothy Newman re Securities Research, dated March 24, 2020	
D-1954			Email from Cynthia Clark to Philip Rutledge and Joe Cole re Draft Letter to PADOBS, dated November 13, 2019	
D-1955			Email from Joe Cole to Philip Rutledge re Euler Hermes Letter, dated July 23, 2019	
D-1958			Deposition of James Klenk, July 26, 2021	
D-1960			Deposition of Joseph Cole Barleta, June 2, 2021	
D-1961			Joel Glick Declaration	
D-1962			Berkowitz Pollack Brant Expert Rebuttal Report of Joel Glick, dated August 27, 2021	
D-1975			Email from Stephen Cohen to Philip Rutledge re Exchange Offer Compliance, dated April 5, 2020	
D-1976			Fox Rothschild Exchange Offer Edits	
D-1979			Email from Brett Berman to Joe Mack re Exchange Offer, dated April 8, 2020	
D-1980			Email from Philip Rutledge to Joe Cole re Form D Draft, dated April 14, 2020	
D-1981			Email from Brett Berman to Philip Rutledge, Stephen Cole, Lauren Taylor re Form D Filing Confirmation, dated April 10, 2020	
D-1982			Email from Philip Rutledge to Joe Cole re Form D Filing, dated April 15, 2020	
D-1989			Email from Joe Cole to Lauren Taylor re Form D Filing Summary, dated April 15, 2020	

D-1992				FSP - CBSG Statement of Work, dated January 1, 2018	
D-2015				Email from Timothy Newman to Benjamin Goodman re Securities Memo, dated March 25, 2020	
D-2017				Email from Timothy Newman to Benjamin Goodman re Securities Opinion, dated March 12, 2020	
D-2018				Email from Benjamin Goodman to Timothy Newman re Securities Research, dated March 23, 2020	
D-2019				Email from Benjamin Goodman to Timothy Newman re Securities Research, dated March 24, 2020	
D-2030				Email from Linda Schmidt to Kara DiPietro, dated July 31, 2020	
D-2041				Email from Martin Hewitt to Cynthia Clark re NJ Cease Desist Order, dated March 1, 2019	
D-2044				Offit Kurman Letter re MCA Product offered by CBSG, dated April 25, 2014	
D-2054				CBSG SEC Form D February 2019	
D-2055				CBSG SEC Form D April 2020	
D-2072				PADOBS v. CBSG Consent Agreement	
D-2086				Testa Heck Testa & White Letter to Bloomberg LP, dated December 19	
D-2088				United Fidelis Licensee Detail	
D-2089				Fidelis CRE Formation Documents	
D-2092				Declaration of Aida Lau Dated August 7, 2020 and Exhibits	
D-2094				Washington Post Article "Small Business used to define America's Economy" dated June 23, 2020	
D-2095				Article, "The Impact of COVID-19 on Small Business Outcomes and Expectations" dated June 23, 2020	

D-2113				Vagnozzi Book, A Better Financial Plan	
D-2114				ABFP PPM	
D-2120				ABFP PPM (Supplemental)	
D-2123				Euler Hermes Insurance Policy for CBSG	
D-2124				Euler Hermes covered clients and credit limits	
D-2126				Letter from CBSG Counsel confirming coverage, December 7, 2018 Uncertain Times: What Small Business Borrowers Find When Browsing	
D-2127				Online Lending Websites, Board of Governors of the Federal Reserve System, December 2019	
D-2128				Merchant Cash Advances, an ETA White Paper/Best Practices Guide, Electronic Transactions Association, March 2008	
D-2130				Affidavit of Aida Lau, August 7, 2020 with Exhibits A through F	
D-2133				State of New Jersey Matter Administrative Proceeding, Release No. 9135 (August 18, 2010)	
D-2139				Brett Berman email to Joseph LaForte re Vagnozzi Letter, dated May 14, 2020	
D-2147				SEC Exhibit 118 (ECF 31-8)	
D-2148				SEC Exhibit 122 (ECF 31-12)	
D-2151				SEC Exhibit Declaration of Gary Delucco	
D-2153				SEC Exhibit Declaration of Raynalda N. Milord	
D-2161				Deposition of Brett Berman, Esq., dated June 8, 2021	
D-2162				Martin Hewitt Email re NJ Cease and Desist Order, dated June 12, 2019	
D-2163				Accredited Investor Package for William L. Altier Trust, dated February 26, 2020	
D-2164				Accredited Investor Package for William L. Altier Trust, dated March 10, 2020	

D-2165				Accredited Investor Package for Henry A. Barth III, dated March 4, 2019	
D-2166				Accredited Investor Package for Cama Plan FBO Henry A. Barth III IRA, dated February 24, 2020	
D-2167				Accredited Investor Package for Yvonne Bechard, dated August 29, 2019	
D-2168				Accredited Investor Package for Steven and Leslie Benardo Rev. Trust, dated May 31, 2019	
D-2169				Accredited Investor Package for Chester and Ana Biernet, dated November 6, 2019	
D-2170				Accredited Investor Package for Betty A. Brabban, dated August 2, 2018	
D-2171				Accredited Investor Package for Morris Bresloof, dated April 30, 2019	
D-2172				Accredited Investor Package for Donna Chlapperini, dated March 4, 2019	
D-2173				Accredited Investor Package for Donna Chlapperini, dated March 9, 2020	
D-2174				Accredited Investor Package for Eugene and Barbara Cirilis Revocable Trust, dated August 13, 2019	
D-2175				Accredited Investor Package for Ronald Clayden, dated July 5, 2018	
D-2176				Accredited Investor Package for Stephen Decker, dated March 4, 2019	
D-2177				Accredited Investor Package for Stephen Decker, dated March 13, 2020	
D-2178				Accredited Investor Package for Gary P. Delucco, dated October 17, 2018	
D-2179				Accredited Investor Package for Gary P. Delucco, dated October 1, 2019	

D-2180				Accredited Investor Package for Samuel M. Dephillippo, dated September 25, 2019, with accompanying July 2019 Charles Schwab and Fidelity Investment statements	
D-2181				Accredited Investor Package for Marc Freedman, dated October 19, 2018	
D-2182				Accredited Investor Package for Cama Plan FBO Marc Freedman IRS, dated November 6, 2019	
D-2183				Accredited Investor Package for Steven Todd Gibson, dated August 22, 2018	
D-2184				Accredited Investor Package for Steven Todd Gibson, dated August 12, 2019	
D-2185				Accredited Investor Package for Cama Plan FBO Bryan Kirk Gillen IRA, dated August 12, 2018	
D-2186				Accredited Investor Package for Leslie J. Goldberg, dated February 15, 2019	
D-2187				Accredited Investor Package for Leslie J. Goldberg, dated February 20, 2020	
D-2188				Hardship (Age) Return of Principal Acknowledgement for Severin Swensen, dated June 3, 2020	
D-2189				Hardship (Age) Return of Principal Acknowledgement for Morris Breslouf, dated June 3, 2020	
D-2190				Accredited Investor Package for Cama Plan FBO Stuart Holst IRA, dated January 20, 2020	
D-2191				Accredited Investor Package for Edward and Kathleen Johnson, dated February 17, 2020	
D-2192				Accredited Investor Package for Mark Kaplan, dated July 1, 2019	
D-2193				Accredited Investor Package for Wadie O. Khoury, dated May 6, 2019	
D-2194				Accredited Investor Package for Wadie O. Khoury, dated September 18, 2019	

D-2195				[Combined Rate] Accredited Investor Package for Wadie O. Khoury, dated October 21, 2019	
D-2196				Accredited Investor Package for Trust of Millen Livis (Living Trust), dated November 13, 2018	
D-2197				Accredited Investor Package for Dale and Sandra Maloney Rev. Trust, dated June 11, 2019	
D-2198				Accredited Investor Package for Roland Manuel, dated March 29, 2019	
D-2199				Accredited Investor Package for Anthony Nicholas Marano, dated October 23, 2018	
D-2200				Accredited Investor Package for Anthony Nicholas Marano, dated March 29, 2019	
D-2201				Accredited Investor Package for Rickey and Elizabeth McIntyre, dated April 8, 2019	
D-2202				Accredited Investor Package for Russell J. Meyer, dated March 27, 2019	
D-2203				Accredited Investor Package for Russell J. Meyer, dated March 2, 2020	
D-2204				Amendment No. 1 to Note for Russell Meyer Cama Plan FBO Russell Meyer Roth IRA, dated May 12, 2020	
D-2205				Accredited Investor Package for Millen Livis Living Trust, dated December 10, 2019	
D-2206				Accredited Investor Package for Wesley and Charlotte Moore, dated February 26, 2020	
D-2207				Accredited Investor Package for Frank Nash, dated October 17, 2018	
D-2208				Accredited Investor Package for Cama Plan FBO Jay R. Palazola IRA, dated March 28, 2019	
D-2209				Accredited Investor Package for Nicholas Pancoast, dated October 18, 2018	
D-2210				Accredited Investor Package for Palm Beach Tax Group, dated June 19, 2019	

D-2211				Accredited Investor Package for Cama Plan FBO Donald Phelps IRA, dated December 6, 2019	
D-2212				Accredited Investor Package for Allen and Phyllis Plotnik, dated August 26, 2019	
D-2213				Accredited Investor Package for Debra Reikes, dated February 28, 2019	
D-2214				Accredited Investor Package for Debra Reikes, dated March 3, 2020	
D-2215				Accredited Investor Package for Robert James Renner, dated August 19, 2019	
D-2216				Accredited Investor Package for Robert James Renner, dated February 28, 2020	
D-2217				Accredited Investor Package for Eugene A. Sheldon, dated September 25, 2018	
D-2218				Accredited Investor Package for Fred Smith, dated August 7, 2019 (6 Units)	
D-2220				Accredited Investor Package for Kenneth & Lauren Stoller, dated June 4, 2019	
D-2221				Accredited Investor Package for Pamela Summer, dated December 5, 2018	
D-2222				Accredited Investor Package for Pamela Summer, dated February 27, 2020	
D-2223				Accredited Investor Package for The Severin K. Swensen and Elaine M. Swensen Revocable Living Trust, dated May 24, 2019	
D-2224				Accredited Investor Package for Cama Plan FBO Peter Valente IRA, dated August 9, 2019	
D-2225				Accredited Investor Package for Jeff and Sheryl Wendt, dated May 6, 2019	
D-2226				Accredited Investor Package for Celeste Zehren, dated May 24, 2019	
D-2227				A Better Financial Plan Agent Update Presentation	

D-2228				CBSG Funding Analysis dated 01/01/13-01/31/20	
D-2229				United Fidelis Group Seminar Ad	
D-2230				United Fidelis Group Welcomne Presentation	
D-2231				Email from Michael Furman to Perry Abbonizio re Seminar Ad & Trent Info, dated March 7, 2019	
D-2232				Email from D. Vagnozzi tro Michael Furman re MCA Agreement, dated March 13, 2018	
D-2233				Mass Email from D. Vagnozzi re: Training invitation, dated December 15, 2017	
D-2234				Email from M. Nardelli to M. Tierney confirming call, dated February 14, 2018	
D-2235				Email from S. kahoe to M. Furman regarding engaging MCA market, dated April 28. 2020	
D-2236				Email from Michael Furman to Zachary Hyman re Par Letter, dated October 31, 2021	
D-2237				Email from Mike Tierny to fund managers re email t investors, dated April 17, 2020	
D-2238				Email from Michael Furman to Zachary Hyman re MCA Update, dated October 31, 2021	
D-2239				Email from Michael Furman to Zachary Hyman re Update & Request, dated October 31, 2021	
D-2240				Email from E. Weingold to M. Furman re introduction to Mark Allen of 3D Media, dated Jaquary 22, 2020	
D-2244				Party Admissions by SEC.docx	
D-2246				14 Min John Recording	
D-2279				BFP058416	
D-2280				Dean asks about insurance.MP3	
D-2281				Dean talking about settlement Recording	
D-2282				Dean Vagnozzi _ Jan 2018 Recording	

D-2283				Dean Vagnozzi Reliance on Counsel Recording	
D-2290				Ex. 77 issues Pauciulo raised with CBSG re exchange offering	
D-2293				Exhibit 31MCA Overview 2018 (720p with 23fps).AVI	
D-2294				Exhibit 32 Our Attorney John Pauciulo (720p with 29fps).AVI	
D-2295				Happy Clients 2020 No GFX_v2 Recording	
D-2296				John Pauciulo April 2018 Recording	
D-2297				John Pauciulo April 2020 Recording	
D-2300				John Paucal June 2017 Recording	
D-2301				John Pauciulo March 2015 Recording	
D-2303				John Pauciulo Nov 2017 Recording	
D-2325				Pauciulo Exhibit 37	
D-2326				Pauciulo Exhibit 39 Recording	
D-2331				The best of Dean's reliance on Pauciulo Recording	
D-2333				Pages from 2021.08.23 DE 727 Reply in Support of Defendants' Motion to Dismiss (01348165)	
D-2334				Fwd_ Introductions Message	
D-2335				Email from Mike Tierny to fund managers re email t investors, dated April 17, 2020 *B & W w/added content)	
D-2336				MCA Amortization Schedule	
D-2337				Email from Ben Mannes to Joe Cole, dated April 8, 2020 (Not Included)	
D-2339				All Exhibits to Defendant's Motions for Summary Judgment, in reservation of all objections.	
D-2340				All Exhibits on the SEC's Exhibit list, in reservation of all objections, in reservation of all objections.	
D-2341				J. Laforte Forbes bio page	

D-2342

CBSG Promissory Notes

Defendant reserves the right to use additional exhibits for impeachment, to rebut testimony by Plaintiff's witnesses, to use demonstrative exhibits, illustrative aides or enlargements, summary exhibits, or any exhibits listed by Plaintiff (without agreeing that such exhibits are admissible) or any other exhibits as permitted by leave of the Court.

Respectfully submitted,

MILLENNIAL LAW, INC.

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By: *s/ Zachary P. Hyman*

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By: */s/ Elroy M. John, Esq.*

Florida State Bar No.: 1002480
Email: Elroy@KnightLawFL.com
Attorneys for Defendant, Michael C. Furman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **4th** day of December, 2021, the foregoing was filed using the Court's CM/ECF system which will send notice of electronic filing to all counsel of record.

By: *s/ Zachary P. Hyman*

Zachary P. Hyman