

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, and

THE LME 2017 FAMILY TRUST, a/k/a

LME 2017 FAMILY TRUST,

Relief Defendant.

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DEFENDANT MICHAEL C. FURMAN'S WITNESS LIST

Pursuant to this Court's Trial Order and the applicable rules of this Court, Defendant, MICHAEL C. FURMAN ("*Furman*"), hereby files his Witness List.

WITNESS LIST

Will Call

1. Michael Furman
c/o Zachary P. Hyman
Furman will testify about the facts and circumstances underlying the instant case, the educational sessions Furman hosted, Furman's efforts to verify whether investors were accredited, and Fidelis' formation and purpose.
3 hours, Cross 3 hours
2. Mark Nardelli
2232 Page Road, Suite 204
Durham NC 27703
919-729-5312
mark@wealthcareadvantage.com
Nardelli will testify about Fidelis' efforts to verify whether investors are accredited.

1 Hour Cross: 1 hour

3. Erik Weingold
50 Main Street, Suite 1000,
New York, NY 10606
646-389-4776
erik@ppmlawyers.com
Weingold will testify about Furman and Fidelis' efforts to comply with SEC regulations and exemptions.
2.0 hour Cross 1.0 Hour
4. Kristin Groleau
4867 Pinemore Lane
Lake Worth, FL 33463
561-346-9385 cell
Groleau can testify about Furman and Fidelis' knowledge of par funding and alleged misstatements, Furman and Fidelis' efforts to verify whether investors were accredited.
2.5 hours
5. Christine Furman
736 Cresta Circle
West Palm Beach, FL 33413
609-870-1475
furmanchris@hotmail.com
Ms. Furman can testify about Furman and Fidelis' efforts to verify whether investors were accredited.
2.5 hours

May Call

6. Joel Glick
c/o Zachary P. Hyman
Mr. Glick may testify about the default rate of Par Funding, its due diligence and other issues raised by the SEC.
3 hours
7. Michael Tierney
234 Mall Blvd, Unit 270
King of Prussia, PA 19406
267-752-3262 cell
mike@abetterfinancialplan.com
2 hours

Tierney will testify about Fidelis and Furman's relationship with Dean Vagnozzi and companies associated with him.

8. David Steinfeld
3801 PGA Blvd #600
Palm Beach Gardens, FL 33410
561-316-7905
dave@davidsteinfeld.com
Steinfeld will testify about Fidelis and Furman's relationship with Dean Vagnozzi and companies associated with him.
30 minutes
9. Roland Manuel
44 Cocoanut Row #5
Palm Beach, Florida 33480
561-655-5777 office
561-601-0372 cell
Roland@palmbeachtaxgroup.com
Manuel will testify about what happened at the educational sessions hosted by Furman.
1.0 hour
10. Steven Benardo
5047 N Highway A1A, Apt PH1
North Hutchinson Island, FL 34949
718-644-5708 cell
stevenleslieny@gmail.com
Mr. Bernado can testify about Furman's efforts to verify whether investors were accredited.
1 hour
11. Kenneth Stoller
8485 Logia Circle
Boynton Beach, FL 33472
kenlaurie3@gmail.com
561-735-9269
Stoller can testify about Furman and Fidelis' educational seminars and efforts to verify that investors were accredited.
1 hour
12. Dean Vagnozzi
234 Mall Blvd, Unit 270
King of Prussia, PA 19406
610-812-6656
dean@abetterfinancialplan.com

Dean Vagnozzi will testify about Fidelis and Furman's indirect relationship with Par Funding, Fidelis and Furman's efforts to raise funds, and Fidelis and Furman's management.

2 hours

13. Brett Berman
2000 Market Street
20th Floor
Philadelphia, PA 19103-3222
bberman@foxrotshchild.com
14. Joe Cole Barletta
c/o Bettina Schein
565 Fifth Avenue
New York, New York
Bschein@bettinascheinlaw.com
15. All Witnesses on the SEC's Witness List
16. All other Defendants in this Action.

Respectfully submitted,

MILLENNIAL LAW, INC.

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By: *s/ Zachary P. Hyman*

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and

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Hollywood, Florida 33021

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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 **5th** day of December, 2021, the foregoing was filed using the Court's CM/ECF Filing system which will transmit Notices of Electronic Filing generated by CM/ECF to all counsel of record.

By: s/ Zachary P. Hyman

Zachary P. Hyman