

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.

PLAINTIFF'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	
PLF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESS	DEFENDANTS OBJECTION(S)
P-2				DE Corporate records of CBSG	R, UP, H, A.
P-3				Fictitious name filing, CBSG dba Par Funding	R, UP, H, A.
P-4				November 28, 2018 Pennsylvania Order against CBSG	R, UP, H, A.
P-5				December 2018 New Jersey Order against CBSG	R, UP, H, A.
P-6				CBSG Form D 2020	
P-11				Joe Macki Par Funding Business Card	R, UP, H, A.
P-15				Recording of Jan. 16, 2020 Abbonizio Conversation	R, UP, H, A.
P-16				Sealed Document - Transcript of Recording of Jan. 16, 2020 Abbonizio Conversation	R, UP, H, A.
P-17				Par Funding Brochure	
P-18				Nov. 18, 2017 Email from Michael Furman to Russ and Renee Meyer re: MCA Investment Information Videos & Summary	

P-19			Meyer March 10, 2018 Class D Promissory Note in Amount of \$9,000	R, C
P-20			Meyer March 10, 2018 Class D Promissory Note in Amount of \$392,000	R, C
P-21			JanFeb2019 folder of Documents received at dinner	R, UP, H, A.
P-22			March 26, 2020 Email Letter re: MCA Investment -Covid 19 letter	R, UP, H, A.
P-23			April 14-15, 2020 emails from Furman to Meyer re: Urgent Par Funding Update Covid 19	R, UP, H, A.
P-24			April 27, 2020 Email from Furman to Meyer re: Par Funding Update-New Investor Terms	R, UP, H, A.
P-25			May 11, 2020 Amendment No. 1 to Meyer Note	R, UP, H, A.
P-26			Property	I;R;UP;404
P-27			Video of MCA 2019	
P-28			Video of MCA 2018	
P-29			PA Certified records for A Better Financial Plan Capital Management, LLC	R, UP, H, A.
P-30			Certified records for abetterfinancialplan.com, LLC.	R, UP, H, A.
P-36			TX Cease and Desist Order	R, UP, H.
P-38			Certified Delaware Records for ABFP Investment Fund	R, UP, H.
P-39			ABFP Management's Management Services Agreement with Fidelis Financial Planning, LLC - 2018-04-24 ABFP Fidelis Planning Management Service Agreement	R, UP, H, A.
P-40			Par Funding Website	R, UP, H, A.
P-41			PA Certified State_ abetterfinancialplan.com LLC	R, UP, H
P-42			abetterfinancialplanning.com website – ABPF Website	R, UP, H, A.
P-43			ABFP Income Fund 2, LP Form D	R, UP, H, A.
P-44			Transcript of Video of MCA 2019	R, UP, H, A.
P-45			ABFP Income Fund LLC Form D	

P-46				CBSG Finder Agreements	R, UP, H, A.
P-47				ABFP Income Fund 2 PPM	R, UP, H, A.
P-48				ABFP Income Fund 2 LP Form D	R, UP, H, A.
P-49				Certified PA order against Vagnozzi/ABFP	R, UP, H, A.
P-50				Feb. 2018 email from Vagnozzi to Abbonizio	R, UP, H, A.
P-51				Fidelis Financial Planning LLC -FFP MCA Fidelis Fund Client PPM	
P-52				Gary DeLucco Fidelis Financial Planning Subscription Agreement	
P-53				March 26, 2020 MCA Investment Update – Covid 19 Investor Letter	R, UP, H, A.
P-54				Apr. 14 Urgent Par Funding Update Covid 19 Investor Letter	R, UP, H, A.
P-55				Apr. 20, 2020 Email From Michael Furman to MCA Investors re: Par Funding Covid Update/New Investor Terms	R, UP, H, A.
P-56				Form D for Fidelis Financial Planning LLC D and D-A	
P-57				Par Funding web capture	R, UP, H, A.
P-58				Jack Terzi March 23, 2018 Promissory Note in the amount of \$1,000,000 and Security Agreement	R, UP, H, A.
P-59				Jack Terzi Aug. 15, 2019 Promissory Note in the amount of \$1,000,000 and Security Agreement	R, UP, H, A.
P-60				Court Search of CBSG Confession of Judgment Lawsuits 1/1/13 – 6/30/20	R, UP, H, A.
P-61				Court Dockets of Pennsylvania Confession of Judgments	R, UP, H, A.
P-62				Chart of NY Court Cases Filed in New York Unity Factor LLC	R, UP, H, A.
P-63				New York Unity Factor LLC Judgment by Confession	R, UP, H, A.
P-64				2019 CBSG Form D	
P-66				Jan. 4, 2018 PADOBS Subpoena	R, UP, H, A.
P-67				CBSG Finder Agreement with A Better Financial Plan	R, UP, H, A.

P-76				Fidelis and United Fidelis Corporate Documents	
P-77				G. Philip Rutledge Feb. 5, 2018 CBSG Response Letter to Penn. Dept. of Banking and Securities Subpoena	R, UP, H, A.
P-78				CBSG Security Agreements	R, UP, H, A.
P-79				CBSG Amended and Restated Note Purchase Agreement-TX	R, UP, H, A.
P-83				March 26, 2020 Email from Dean Vagnozzi re: Important MCA Update	R, UP, H, A.
P-84				Steven Weinkranz's July 7, 2020 Email from Dean Vagnozzi to Anita Badalamenti RE: MCA Update	R, UP, H, A.
P-85				Steven Weinkranz's April 17, 2020 Email from Dean Vagnozzi re: ABFP Income Fund 2 Update	R, UP, H, A.
P-86				CBSG Promissory Notes	R, UP, H, A.
P-87				Brad Beebe Promissory Notes	R, UP, H, A.
P-88				Brad Beebe's March 12, 2020 Email from Dean Vagnozzi re: MCA Investment Update forwarding Email from Joe Cole attaching Feb Par Funding Analysis & Coronavirus Statement	R, UP, H, A.
P-89				Brad Beebe's March 16, 2020 Email from Anita Badalamenti re: MCA Update	R, UP, H, A.
P-90				Brad Beebe's March 26, 2020 Email from Dean Vagnozzi forwarding March 24, 2020 Email from Par Funding Management re: Par Funding Covid 19 Update	R, UP, H, A.
P-91				Brad Beebe's Apr. 7, 2020 Email from Dean Vagnozzi re: Merchant Cash Update	R, UP, H, A.
P-92				Brad Beebe's Apr. 26, 2020 Email from Anita Badalamenti re: Income Fund I Paperwork & Video	R, UP, H, A.
P-93				April 24, 2020 ABFP Income Fund LLC Supplement to PPM for the Exchange of Outstanding Promissory Notes for Amended and Restated Promissory Notes	R, UP, H, A.
P-96				Agent Guide	R, UP, H, A, BER

P-99			Fidelis Financial Planning LLC PPM	
P-100			Dec. 14, 2017 Email Exchange Between Joe Mack and Dean Vagnozzi re: Joe Mack and Vagnozzi talking about their roles	R, UP, H, A.
P-101			Nov. 5, 2017 Email from Dean Vagnozzi to Joe Mack re: Questions if LaForte in Charge	R, UP, H, A.
P-102			Apr. 2, 2018 Email from Alexis Abbonizio to Dean Vagnozzi re: Marketing Materials	R, UP, H, A.
P-103			Jan. 9, 2018 Email Exchange Between Alexis Abbonizio and Michael Furman re: Russ Meyers MCA Paperwork	R, UP, H, A.
P-104			Jan. 30, 2018 Email from Michael Furman to Perry, Anita and Dean Vagnozzi re: Need Update on New Note for Meyer	R, UP, H, A.
P-106			Vagnozzi Ad	R, UP, H, A, BER
P-107			MCA Presentation	R, UP, H, A.
P-108			July 6, 2018 Email from Michelle Price to Alexis Abbonizio re: 7/10/18 Note	
P-109			Sealed Document Composite of July 8, 2020 Text Messages	R, A, H
P-110			Sealed Document July 10, 2020 KM Capital LLC and Nominee of Entity Promissory Note and Security Agreement in amount of \$10,000,000	R, A
P-111			Videos of July 9, 2020 Meeting at CBSG with Perry Abbonizio, Joseph LaForte, Joseph Cole Barleta and Ariel Mannes	R, UP, H, A.
P-112			Sealed Document Transcript of July 9, 2020 Meeting at CBSG with Perry Abbonizio, Joseph LaForte, Joseph Cole Barleta and Ariel Mannes	R, UP, H, A.
P-113			Audio of July 8, 2020 Perry Abbonizio Phone Calls	R, UP, H, A.
P-114			Sealed Document Transcript of July 8, 2020 Perry Abbonizio Phone Calls	R, UP, H, A.
P-115			Videos of Dec. 18, 2019 Meeting with Shannon Westhead	R, UP, H, A.

P-116				Sealed Document Transcript of Dec. 18, 2019 Meeting with Shannon Westhead	R, UP, H, A.
P-117				Recording of June 24, 2020 Meeting with Joseph LaForte, Joseph Cole Barletta, Perry Abbonizio, David Chessler, and Others	R, UP, H, A.
P-118				Sealed Document Transcript of June 24, 2020 Meeting with Joseph LaForte, Joseph Cole Barletta, Perry Abbonizio, David Chessler, and others	R, UP, H, A.
P-122				Recording of Feb. 6. 2020 Meeting with Perry Abbonizio and Joseph LaForte	R, UP, H, A, BER
P-123				Sealed Document Transcript of Feb. 6, 2020 Meeting with Perry Abbonizio and Joseph LaForte	BER
P-124				Recording of 10-25-2019 Call between Taylor and Furman Part 1	UP, H, A
P-125				Sealed Document Transcript of October 25, 2019 Call between Taylor and Furman Part 1	BER, UP, H, A, R
P-126				Recording of Oct. 25, 2019 Telephone Call between Taylor and Furman Part 2	BER, UP, A, H
P-127				Sealed Document Transcript of Oct. 25, 2019 Telephone Call between Taylor and Furman Part 2	BER, BER, H, UP, A
P-128				Recordings of March 5, 2020 Meeting with Dean Vagnozzi	R, H, UP, A
P-129				Sealed Document Transcript of March 5, 2020 Meeting with Dean Vagnozzi	R, H, UP, BER, A, UP
P-130				Recordings of Jan. 7, 2020 CBSG Solicitation Meeting with Perry Abbonizio	R, H, UP, A
P-131				Sealed Document Transcript of Jan. 7, 2020 CBSG Solicitation Meeting with Perry Abbonizio	BER, R, H, UP, A
P-134				Transcript of Video of MCA 2018	BER, R, H, UP, A
P-136				Video of Better Financial Plan Ideal Investment	
P-137				Transcript of Better Financial Plan Ideal Investment	BER
P-140				Recording of Feb. 20, 2020 Meeting with Perry Abbonizio and Joseph LaForte	R, H, UP, A

P-141				Sealed Document Transcript of Feb. 20, 2020 Meeting with Perry Abbonizio and Joseph LaForte	BER, R, H, UP, A
P-143				Video Email – 1C Link Video Caption President & CEO Dean Vagnozzi A Better Financial Plan	R, H, UP, A
P-144				Transcript of 1C Link Video Caption President & CEO Dean Vagnozzi A Better Financial Plan	BER, R, H, UP, A
P-145				Video of A Better Financial Plan Unbranded	R, H, UP, A
P-146				Transcript of A Better Financial Plan Unbranded	BER, R, H, UP, A
P-149				Security Agreement Assignment	R, H, UP, A
P-152				March 6, 2020 Email from Dean Vagnozzi to Chris McMorrow, Joe Cacchione, Joe Gassman, Jacalyn Kerbeck, Mike Tierney and Perry Abbonizio re: MCA Fund Managers	R, H, UP, A
P-153				March 31, 2018 Email from Dean Vagnozzi to John Pauciulo re: Agents Meeting on 5th	R, H, UP, A
P-156				Video of Vagnozzi Vimeo	R, H, UP, A
P-157				Transcript of Vagnozzi Vimeo	BER, R, H, UP, A
P-160				Recording-7 Conv. Abbonizio_2020Jan16	C, R, H, UP, A
P-161				Sealed Document Transcript of Recording-7 Conv. Abbonizio Jan. 16, 2020	C, BER
P-162				Composite of Dean Vagnozzi Emails re Presentations	C, R, H, UP, A
P-163				Videos of Ace Club Presentation July 31, 2019	R, H, UP, A
P-164				Videos of Ace Club Dinner Event Oct. 2, 2019	R H, UP, A
P-165				Videos of Maggianos Presentation 2017	R, H, UP, A
P-166				Videos of Maggianos Presentation 2019	R, H, UP, A
P-167				Video of Promo 2016	R, H, UP, A
P-168				ABFP Ads	R, H, UP, A

P-169				Recording of A Better Financial Plan 2018-01-12	R, H, UP, A
P-172				SEC C&D Order Against Abetterfinancialplan.com and Vagnozzi	R, H, UP, A
P-174				Jan. 11 Review	R, H, UP, A
P-175				ABPF Income Fund LLC PPM	R, H, UP, A
P-176				UCC Lien Filings	R, H, UP, A
P-177				Composite of Photos of Par Funding	R, H, UP, A
P-182				Oct. 26, 2017 Email from Shannon Westhead to sz32836@yahoo.com cc Abbonizio and Vagnozzi re: Flying to Philadelphia	R, H, UP, A
P-185				12/11/17 Email from Alexis Abbonizio to Shannon Westhead re: MCA DEC Updates	R, H, UP, A
P-186				12/14/17 Email from Joe Mack to Vagnozzi and Joe Cole re: proof of Commissions	R, H, UP, A
P-187				12/14/17 Email from Joe Mack to Vagnozzi re: Also	R, H, UP, A
P-188				April 3, 2018 Email from Vagnozzi to Joe Cole and Alexis Abbonizio re: 2 nd Fund	R, H, UP, A
P-192				Furman Notes	
P-200				Sales Presentation of Dean Vagnozzi CEO and President of ABetterFinancialPlan.Com LLC	R, H, UP, A
P-201				Par Funding Website	R, H, UP, A
P-202				Transcript of Recorded Undercover Conversation with Perry Abbonizio	R, H, UP, A, BER
P-203				Video of June MCA Update	R, H, UP, A
P-204				Transcript of June MCA Update	BER
P-205				Fidelis Financial Planning Spreadsheet	
P-206				Fidelis Financial Workbook Principal	
P-207				Video of Take Back Your Financial Future 207A Transcript of Video of Take Back Your Financial Future	BER, R, H, UP, A
P-208				Video of March 30 MCA Update	R, H, UP, A
P-209				Transcript Video of March 30 MCA Update	BER, R, H, UP, A
P-212				A Better Financial Plan Brochure	R, H, UP, A
P-215				Fidelis Advertisement	

P-216				Nov. 2, 2019 Email Invitation from Shannon Westhead to wbbutler13@gmail.com	R, H, UP, A
P-217				Multi-Strategy Event Brochure	R, H, UP, A
P-218				Photo of Regional 2 13 2020 12	R, H, UP, A
P-219				Seminar Feb 2020 SFA MCA	R, H, UP, A
P-220				UFG 30SEC Commercial Jan. 2020	R, H, UP, A
P-225				8/21/18 Email from Alexis Abbonizio Re: July 2018 CBSG Funding Analysis	R, H, UP, A
P-231				4/26/20 Email from Anita Badalamenti re: Income Fund 3 Paperwork and Video	R, H, A
P-232				ABFP Income Fund 3 LL Supplement to PPM for the Exchange of Outstanding Promissory Notes for Amended and Restated Promissory Notes	R, H, UP, A
P-237				3/20/20 Email from Dean Vagnozzi re: Merchant Cash Update	R, H, UP, A
P-238				4/8/20 Email from Dean Vagnozzi to Joseph Greenberg re: Par Funding Default	R, H, UP, A
P-239				4/19/20 Email from Anita Badalamenti re: MCA Terms of Offer Explained	R, H, UP, A
P-240				5/27/20 Email from Anita Badalamenti re: Income 3 Parallel Fund	R, H, UP, A
P-241				June 15, 2020 Email from Lisa McElhone to Joe Mack re: Personal Financial Statement	R, UP, I, Cnf
P-242				Radio Marketing _FL_01_02533183	R, H, UP, A
P-245				3/30/20 Email from Dean Vagnozzi re: Merchant Cash Update	R, H, UP, A
P-247				6/5/20 Email from Dean Vagnozzi re: MCA Update	R, H, UP, A
P-249				6/21/16 Promissory Note in the amount of \$125,000 Between CBSG and Karen Smith and Security Agreement	C, R, H, UP, A
P-252				CBSG & Related LLC Purchase Fund Transfer 8-13-20	R, H, UP, A
P-254				4/18/18 Management Services Agreement Between ABFP Management Company LLC and LWM Equity Fund LP signed by David Gollner	R, H, UP, A
P-255				4/3/18 Management Services Agreement Between ABFP Management Company LLC and LWM Equity Fund LP signed by David Gollner	R, H, UP, A
P-256				7/10/18 Management Services Agreement Between ABFP Management Company LLC and Victory Income Fund LLC signed by Francis Cassidy	R, H, UP, A

P-258			4/30/18 Management Services Agreement Between ABFP Management Company LLC and Wellen Fund 1 signed by Joseph Gassman	R, H, UP, A
P-259			Photo of Vagnozzi at a Better Financial Plan Presentation	R, H, UP, A
P-260			July 9-10, 2018 Email Exchange Between Joseph Gassman and Alexis Abbonizio re: Wellen Fund I	R, H, UP, A
P-261			5/18/18 Email from Alexis Abbonizio to Joseph Gassman re: Fund Information	R, H, UP, A
P-262			5/18/18 Email from Joseph Gassman to Perry Abbonizio and Dean Vagnozzi re: Invitation for May 30	R, H, UP, A
P-263			6/3/18 Email Exchange Between Perry Abbonizio and Joe Gassman re: Visit June 4 at 3:30	R, H, UP, A
P-264			2/26/19 Email Exchange Between Perry Abbonizio and Joseph Gassman re: CBSG Mtg	R, H, UP, A
P-265			Recording of December 2018 Conference Call with Dean Vagnozzi	R, H, UP, A
P-266			Transcript of Recording of December 2018 Conference Call with Dean Vagnozzi	R, H, UP, A BER
P-267			4/5/19 Management Services Agreement Between ABFP Management Company LLC and GRB Income Fund LLC signed by Mark Nardelli	R, C
P-268			4/5/19 Non-Disclosure Agreement Between Mark Nardelli and A Better Financial Plan.Com LLC	R, C
P-270			CBSG and Affiliate Consolidated Financial Statement for Year Ended December 31, 2017 and Independent Auditors' Report (without Adverse Opinion)	R, H, UP, A
P-271			ABFP Press Release	R, H, UP, A
P-278			Radio Marketing _FL_01_02533184	R, H, UP, A
P-279			3/6/20 Email from Dean Vagnozzi to Chris McMorro, Joe Cachione, Joe Gassman, Jacalyn Kerbeck and Perry Abbonizio re: MCA Fund Managers	R, H, UP, A
P-281			4/1/16 Consulting Agreement Between CBSG and Perry Abbonizio	R, H, UP, A
P-282			9/16/19 Email from Ben Mannes to Perry Abbonizio re: 6/15/19 CBSG Org Chart	R, H, UP, A
P-283			Melissa Davis Expert Report Dated 8/13/21	R, H, UP, A
P-284			Melissa Davis Ex. Select Definitions Used in Report	R, H, UP, A, BER
P-285			Melissa Davis Ex. List of Documents Utilized	R, H, UP, A, BER

P-286			Melissa Davis Ex. Quickbooks General Ledger Account Classification	R, H, UP, A, BER
P-287			Melissa Davis Ex. List of Related Parties	R, H, UP, A, BER
P-288			Melissa Davis Ex. CBSG Funding Analysis 1/1/13-6/30/20	R, H, UP, A,
P-289			Melissa Davis Ex. CBSG Balance Sheet as of 7/27/20	R, H, UP, A
P-290			Melissa Davis Ex. List of Par Funding Investor Receipts and Disbursements (Note 1)	R, H, UP, A
P-291			Melissa Davis Ex. Chart of Par Funding Annual Cash Reconstruction Summary for Period 11/2/11 through 7/27/20 Net Receipts and Disbursements by Year	R, H, UP, A
P-292			Melissa Davis Ex. Chart of Par Funding Annual Cash Summary for Period 11/2/11 through 7/27/20	R, H, UP, A
P-293			Melissa Davis Ex. Chart of Summary of Net Merchant Advance Activity by Funding Year per Individual Merchant Advance	R, H, UP, A
P-294			Melissa Davis Ex. Chart of Summary of CBSG MCA Suites Activity for Period 2012 through 7/27/20	R, H, UP, A
P-295			Melissa Davis Ex. Chart of Category A Detail of CBSG MCA Suites Activity for Period 2012 through 7/27/20	R, H, UP, A
P-296			Melissa Davis Ex. Acknowledgement of Yaakov Pollack and Moshe Pollack and Factoring Agreement	R, H, UP, A
P-297			Melissa Davis Ex. Chart of Category B Detail of CBSG MCA Suites Activity for Period 2012 through 7/27/20	R, H, UP, A
P-298			Melissa Davis Ex. Chart of Category C Detail of CBSG MCA Suites Activity for Period 2012 through 7/27/20	R, H, UP, A
P-299			Melissa Davis Ex. Chart of ABetterFinancialPlan.Com LLC Transactions for Period 7/1/15 through 7/27/20	R, H, UP, A
P-301			Melissa Davis Qualifications	R, H, UP, A
P-302			Radio Marketing _FL_01_02533185	R, H, UP, A
P-303			6/19/17 Email Exchange Between Perry Abbonizio and Alexis Abbonizio re: Marketing Deliverables	R, H, UP, A
P-304			4/11/18 Email from Alexis Abbonizio to Joe Mack re: CBSG Investor Material	R, H, UP, A
P-306			Radio Marketing _FL_01_02533193	R, H, UP, A
P-308			Radio Marketing _FL_01_02533217	R, H, UP, A

P-309			Agent Fund Sign Up Forms – Vagnozzi redacted	R, H, UP, A
P-310			Feb. 2, 2016 Email from Jeff Schneideer to Joe@parfunding	R, H, UP, A
P-311			March 13, 2016 Email from Jeff Schneider to Joe Mack, Joe Cole and Perry Abbonizio re: Investor Presentation	R, H, UP, A
P-312			May 8, 2016 Email from Schneider to Mack, Cole and Abbonizio re: prospects	R, H, UP, A
P-313			April 3, 2016 Email from Schneider to Mack and Abbonizio re: Draft Par Funding Website	R, H, UP, A
P-314			April 4, 2016 Email from Schneider to Mack, Cole and Abbonizio re: Par Website	R, H, UP, A
P-315			March 11, 2016 Email from Schneider to LaForte re: Marketing Materials	R, H, UP, A
P-317			Jan. 28, 2020 Email from Kathleen Montesano to Joe Mack re: Par Funding Brochures (Par Brochure2 and ParBrochureWhite	R, H, UP, A
P-318			Radio Marketing _FL_01_02533226	R, H, UP, A
P-320			April 4, 2016 Email from Perry Abbonizio to Joe Mack re: CBSG Website	R, H, UP, A
P-324			April 5, 2020 Email from Joe Cole to Joe Mack re: Investor Lists	R, H, UP, A
P-326			Furman Radio Ad	
P-327			Furman Radio Ad	
P-328			Radio Marketing _FL_01_025332328	R, C
P-329			Radio Marketing _FL_01_02533372	R, C
P-330			Radio Marketing _FL_01_02533373	R, C
P-331			April 19, 2019 Email from Dan Ring to Joe Cole, Joe Mack, Brian Smith, John Hartley and Denise Devlin re: WIP Report 6/30/21 Legal Tracking Chart	R, H, UP, A
P-332			Radio Marketing _FL_01_02533384	R, C
P-333			Radio Marketing _FL_01_02533544	R, C
P-334			Radio Marketing _FL_01_02533654	R, C
P-335			Radio Marketing _FL_01_00073344	R, C
P-336			United FidelisGroup.com Website	R, H, UP, A, BER
P-337			2017 Par Funding Brochure Draft	R, H, UP, A

P-338			2018 Par Funding Brochure	R, H, UP, A
P-339			8/10/18 Org Chart	R, H, UP, A
P-340			June 4, 2019 Email from Perry Abbonizio to Joe Cole re: Thanks for meeting	R, H, UP, A
P-341			Recording of Vagnozzi Radio Ad IMG_0067	R, C
P-342			Transcript of Vagnozzi Radio Ad IMG0067	R, C
P-344			Oct. 16, 2018 Email from Alexis Abbonizio to Mike Tierney re: Corporate Overview	R, H, UP, A
P-345			Jan. 6, 2020 Email from Alexis Abbonizio to GR8 Income Mark Nardelli re: Sending Brochures	
P-346			Ex. 104 to Glick Deposition CBSG A/R Aging Summary for Dec. 31, 2013 – July 27, 2020	
P-347			March 25, 2019 Email Exchange Between Alexis Abbonizio and Joe Cole re: Wires Received	R
P-348			May 14, 2017 Email from Alexis Abbonizio to Joe Mack re: Meeting Request to Review Marketing	R, H, UP, A
P-349			Sept. 10, 2018 Email from Alexis Abbonizio to Perry Abbonizio re: Fwd Par Funding Brochure	R, H, UP, A
P-351			Video of Paperwork on Vimeo	R, H, UP, A
P-352			Invitation to ABFP March 26 Presentation	R, H, UP, A
P-353			Par Funding Website	R, H, UP, A
P-354			May 19, 2017 Email from Alexis Abbonizio tot Joe Mack re: Marketing Deliverables	R, H, UP, A
P-355			April 11, 2018 Email from Alexis Abbonizio to Joe Mack re: CBSG Investor Material	R, H, UP, A
P-356			April 2, 2019 Email from Alexis Abbonizio to Dana Vagnozzi re: Updated Marketing	R, H, UP, A
P-358			Jan. 11, 2018 Email from Dean Vagnozzi to Anita@abetterfinancialplan.com re: Please Review going to agents	R, H, UP, A
P-359			BT Depo Exhibit	R, H, UP, A
P-360			BT – Misc. slides (003	H, A, BER, I; R; UP; Cnf
P-361			Big Red Depo Ex.	R, H, UP, A
P-362			Colorado Homes Depo Exhibit	R, H, UP, A
P-363			Kingdom slides	H, A, BER; I; R; UP; Cnf
P-364			Kingdom Logistics Depo Exhibit	R, H, UP, A

P-365			NBA Depo Exhibit	R, H, UP, A
P-366			The Libra Fund LLC PPM	R, C, H,
P-367			NBA Slides	I; R; UP; A; Cnf
P-368			June 17, 2020 Email from Tori Villarose to Joe Mack Fw Email from Jonathan Christman to Brett Berman, Joe Cole, Wendy Furman and Aida Lau re: HMC Deposition	R, H, UP, A
P-369			QB AR Summary as of 7-27-20	I; R; A; Cnf
P-370			ASU_2016-13	R, H, UP, A
P-372			QB Annual Aging	R, H, UP, A
P-375			A Better Financial Plan Facebook Page	R, A, C
P-376			Business Card for Perry Abbonizio	R, H, UP, A
P-377			Recording-9 Conv. Mike T_ABFP_2020Jan9 (transcript	R, H
P-378			Transcript of Recording-9 Conv. Mike T ABFP 2020Jan9	R, H, BER
P-379			Recording-6 Advertisement Recording	R, H, BER
P-380			Transcript of Recording-6 Advertisement Recording	R, H, BER
P-381			March 19, 2018 Email from Michael Furman to Perry Abbonizio re: New Invoice from Weingold Law PLLC	R, H, UP, A
P-383			May 18, 2018 Email from Alexi Abbonizio to Joseph Gassman re: Fund Information	
P-384			A Better Financial Plan – What’s the Catch Financial Investment www_abetterfinancialplan_com	R
P-386			A Better Financial Plan - With Dean Vagnozzi Bad Investments Dont Exist' - www_abetterfinancialplan_com	R
P-387			A Better Financial Plan -P-387 COVID-19 Calls for Creative Financial Strategies' - www_abetterfinancialplan_com	R
P-388			Aug. 1, 2018 Email from Alexis Abbonizio to Perry Abbonizio and Jayesh Patel re: Clients for Advertisement	R
P-389			FidelisPlanning.Com Web Pages	R, H, UP, A, BER
P-391			ABetterFinancialPlan.Com Website	R, H, UP, A
P-404			Nov. 21-Dana	R, H, UP, A

P-405				Nov. 21-Dom	R, H, UP, A
P-406				Nov. 21 Prospects	R, H, UP, A
P-407				July 22, 2020 Email from Perry Abbonizio to Joe Mack and Anthony re: Great Ad and Video	R
P-408				April 17, 2018 Email from Dean Vagnozzi to Michael Firm re: Commercials and Commercials	R, H, UP, A
P-410				May 10, 2017 Email from Alexis Abbonizio to Joe Mack re: CBSG Marketing Deliverables	R, H, UP, A
P-411				April 10, 2019 Email from Dan Reisinger to Perry Abbonizio re: Draft Presentation for April 16 th and 23 rd Dinners	R, H, UP, A
P-413				June 8, 2020 Email from Erik Weingold to Perry Abbonizio forwarded to Joe Mack re: PPM Draft	R, H, UP, A
P-414				March 11, 2019 Email from Alexis Abbonizio to Perry Abbonizio forwarding to Joe Mack re: 3/10/19 Fund Totals	R, H, UP, A
P-415				Par Funding Corporate Overview	R, H, UP, A
P-418				May 16, 2018 Email Exchange Between John Pauciulo, Perry Abbonizio and Joseph Gassman re: Gassman	R, H, UP, A
P-420				Feb. 27, 2019 Email from John Myura to Perry Abbonizio re: Final Details for Tomorrow	R, H, UP, A
P-424				Jan. 24, 2018 Email Exchange Between Perry Abbonizio and Michael Furman re: Urgent Help for Client for New Note Coming (Russell Meyer)	
P-425				Composite of ABFP Agent Fund Contracts	R, H, UP, A
P-426				June 19, 2017 Email from Perry Abbonizio to Joe Mack re: Marketing Deliverables	R, H, UP, A
P-427				April 18, 2018 Email Exchange Between Erik Weingold and Michael Furman re: Drat PPM	
P-428				April 9-18, 2018 Email Exchange Between Erik Weingold and Michael Furman re: Draft PPM	
P-429				May 15, 2017 Email from Perry Abbonizio to Joe Mack re: Rosens Guy John Phelan	
P-430				Jan. 26, 2017 Email from Perry Abbonizio to Joe Mack re: Prospect Meeting Rick Lynch	
P-431				Dec. 12-13, 2017 Email Exchange Between John Muratore, Perry Abbonizio and Joe Mack re: Protected Agent List/Recap	R, H, UP, A
P-432				March 3, 2017 Email from Perry Abbonizio to Joe Mack re: MCA Totals 2/27/17	R, H, UP, A
P-433				March 11, 2019 Email from Perry Abbonizio to Joe Mack re: 3/10/2019 Fund Totals	R, H, UP, A
P-434				Jan. 20, 2017 Email from Perry Abbonizio to Joe Mack re: MCA Totals	R, H, UP, A
P-435				June 10, 2017 Email from Perry Abbonizio to Joe Mack re: ABFP MCA Week of 06/05/17	R, H, UP, A

P-436			April 19, 2018 Email Exchange Between Joe Cole and Dean Vagnozzi re: Introduction	R, H, UP, A
P-437			Jan. 1, 2018 Email from Joe Cole to Perry Abbonizio re: Investors 1/1/18	R, H, UP, A
P-439			Apr. 28, 2017 Email Exchange Between Perry Abbonizio and Joe Mack re: Tom Custance	R, H, UP, A
P-440			Feb. 15, 2018 Email from Dean Vagnozzi to Michael Furman re: MCA Process	
P-441			Depo. Exhibit 18 - 2015.12.01 Vagnozzi Mailer invest like the big boys	R, H, UP, A
P-442			screenshot-web-archive-org-web-20200417202253-http-www-abfpincomfund-com	R, A, BER, H
P-443			screenshot-web-archive-org-web-20181106110833-https-www-fidelisplanning-com	
P-444			April 17, 2018 Email from Dean Vagnozzi to Michael Furman re: Recorded Message	
P-447			CBSG Brochure	R, H, UP, A
P-448			CBSG Website	R, H, UP, A
P-449			April 12, 2018 Email from Joe Mack to Alexis Abbonizio re: CBSG Investor Material	R, H, UP, A
P-451			Oct. 3, 2016 Email from Dean Vagnozzi to Tom Chaves and Alexis Abbonizio re: MCA	R, H, UP, A
P-452			Jan. 11, 2018 Email from Dean Vagnozzi to Agents	R, H, UP, A
P-454			Dec. 10, 2017 Email from Michael Furman to Dean Vagnozzi re: Come Back to see Us	R, H, UP, A
P-457			CBSG Creditor Agreements List	R, H, UP, A
P-459			Recording and Transcript of Bill Bromley Mixdown	R, H, UP, A BER
P-473			May 15, 2016 CBSG Finder's Fee Agreement Between CBSG and Daniel A Cistone	R, H, UP, A
P-478			June 5, 2020 List of CBSG Finders Investors	R, H, UP, A
P-480			Video and Transcript MCA Overview 2018	Received 11/22/21, BER R, H, UP, A
P-482			Video and transcript of Apr. 18, 2020 Vagnozzi and Pauciulo	Received 11/22/21, BER R, H, UP, A
P-483			Par Funding Brochure	Received 11/22/21
P-485			MCA Presentation	R, H, UP, A

P-486			April 26, 2018 Email from Michael Furman to Erik Weingold r:e Document Agreement to Look at Mgmt for PPM	
P-502			Jan. 14, 2020 Email from Dean Vagnozzi to Perry Abbonizio re: Interest & Commission	R, H, UP, A
P-504			Nov. 15, 2017 Email from Dean Vagnozzi to Michael Furman, Anita@abetterfinancialplan.com and Shannon Westhead re: Good Day Dean	R, H, UP, A
P-505			June 26, 2020 Email from Wendy Furman to Brett Berman, Joe Cole, Anita Lau and Joe Mack re: Meeting	R, H, UP, A
P-506			April 5, 2018 Email from Joe Mackie to Michael Furman re: Joe Mackie Commented on Your Site	
P-507			March 19, 2018 Email from Michael Furman to Darren Hayes re: PPM	
P-508			March 18, 2018 Email from Michael Furan to Darren Hayes re: PPM	
P-509			Berman and Joe Cole re: 3/17/20 Daily Update	R, H, UP, A
P-512			Jan. 2, 2018 Email From Perry Abbonizio to Joe Cole and Joe Mack re: Finder Commissions	R, H, UP, A
P-520			May 19, 2020 Email from Joe Mack to Perry Abbonizio and Joe Cole re: funds	R, H, UP, A
P-522			Certificate Log	R, H, UP, A
P-523			Excel Spreadsheet Copy of Fidelis Financial Planning CLOSED 2020 VERSION	R, H, UP, A
P-524			Renner Notes by Fidelis	R, H, UP, A
P-525			April 12, 2018 Email from Alexis Abbonizio to Joe Mack and Perry Abbonizio re: CBSG Investor Material	R, H, UP, A
P-526			Renner Exchange Note	R, H, UP, A
P-527			Fidelis Notes as to Renner	R, H, UP, A
P-528			Oct. 2,3 2017 Email from Perry Abbonizio to Joe Mack and Joe Cole re: Investor Commissions 10/23/17	R, H, UP, A
P-529			April 12, 2018 Email from Perry Abbonizio to Joe Mack and Alexis Abbonizio re: CBSG Investor Material	R, H, UP, A
P-530			Renner Fidelis Promissory Note	R, H, UP, A
P-531			May 12, 2020 Email	R, H, UP, A
P-534			April 6, 2018 Email from Joe Mack to Kara DiPietro and Perry Abbonizio re: Investors?	R, H, UP, A
P-539			Aug. 13, 2018 Email from Joe Cole to Joe Mack re: Updated Org Chart	R, H, UP, A

P-540			Weingold Invoice	R, H, UP, A
P-541			Michael Furman Invoice from Weingold Law	R, H, UP, A
P-544			CBSG UCC Lien	
P-545			Nov. 17, 2017 Email From Anita to Michael Furman and Alexis Abbonizio re: Cama Paperwork	R, H, UP, A
P-546			Fidelis Notes Chart	R, H, UP, A
P-547			March 15, 2018 Email from Perry Abbonizio to Michael Furman re: Flu Voice but will call today	R, H, UP, A
P-548			March 2, 2018 Email from Russ Meyer to Michael Furman re: Resolute Capital Partners Note	R, H, UP, A
P-549			Feb. 3, 2018 Email from Dean Vagnozzi to Michael Furman re: Need Update on New Note for Meyer	R, H, UP, A
P-550			Jan. 31, 2018 Email from Dean Vagnozzi to Michael Furman re: Need Update on New Note for Meyer	R, H, UP, A
P-551			Jan. 9, 2018 Email from Russ Meyer to Michael Furman re: MCA Paperwork	R, H, UP, A
P-552			Jan. 3, 2018 Email Re_ Funded from Alexis Abbonizio to Michael Furman Re: Funded Cama Plan need next steps	R, H, UP, A
P-553			Furman's Response to Request for Admissions	R, H, UP, A
P-554			Management Agreement	R, H, UP, A
P-555			March 2, 2018 Email from Michael Furman to Shannon Westhead re: MCA Paperwork	R, H, UP, A
P-556			Feb. 22, 2018 Email from Michael Furman to Dean Vagnozzi re: MCA Paperwork Update	R, H, UP, A
P-557			Feb. 15, 2018 Email from Vagnozzi to Furman re: MCA Process	R, H, UP, A
P-558			Jan. 3, 2018 Email from Michael Furman to Alexis Abbonizio re: Funded CamaPlan need next steps	R, H, UP, A
P-559			Dec. 29, 2017 Email from Michael Furman to Dean Vagnozzi re: Funded CamaPlan Need Next Steps	R, H, UP, A
P-560			Dec. 29, 2017 Email from Michael Furman to Alexis Abbonizio re: Funded CamaPlan need next steps	R, H, UP, A
P-561			Nov. 18, 2017 Email from Michael Furman to Russ Meyer re MCA Investment Information Videos & Summary	R, H, UP, A
P-562			Feb. 16, 2018 Email from Shannon Westhead to Michael Furman re MCA Paperwork	R, H, UP, A

P-563				Feb. 19, 2018 Email from Michael Furman to KahunaFL re MCA Paperwork	R, H, UP, A
P-564				Furman – Abbonizio Chat History	R, H, UP, A
P-565				Vagnozzi-Furman Text Message June 2020	R, H, UP, A
P-566				Vagnozzi-Furman Text Message June 2020	R, H, UP, A
P-567				New Jersey Division of Consumer Affairs Press Release	R, H, UP, A
P568				Sheldon Investment Checks	R, H, UP, A
P-569				Declaration of Michael Furman	R, H, UP, A
P-570				SMS text messages	R, H, UP, A
P-571				KM Capital LLC Promissory Note	R, H, UP, A
P-572				MCA Agreement	R, H, UP, A
P-573				Alternative Investment Seminar Lists	R, H, UP, A
P574-				List of Par Funding Cases Filed in PA	R, H, UP, A
P-575				Summary of Chart of Merchant Borrowers	R, H, UP, A
P-576				Alternative Investment Lunch Event ad/invite	R, H, UP, A
P-577				The United Fidelis Group PPM Principal Bio	R, H, UP, A
P-578				Par Funding Corporate Overview	R, H, UP, A

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