

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 AMENDED 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.
Direct 2 hours.
2. Kristin Groleau
4867 Pinemore Lane
Lake Worth, FL 33463
561-346-9385 cell
Groleau can testify about Furman and Fidelis' knowledge and involvement with of par funding, the preparation of educational materials and other information, the separation

between the two entities, and to the extent permitted any alleged misstatements or omissions that Furman made.

Direct 1.5 Hours

3. Christine Furman
736 Cresta Circle
West Palm Beach, FL 33413
609-870-1475
furmanchris@hotmail.com

Ms. Furman can testify about what happened at Furman and Fidelis' educational seminars, Furman's intent and state of mind, Furman's disclosure of information to investors, and her dealings with Mr. Nash, Mr. Barth and Mr. Renner.

Direct 1 hour.

4. Joe Cole Barletta
c/o Bettina Schein
565 Fifth Avenue
New York, New York
Bschein@bettinascheinlaw.com

Barletta will testify about the use of the cash over cash method with respect to the KPI investor reports, the audit of the year ending in 2017 and other related audits, Furman's involvement with Par Funding, Par Funding's sale of promissory notes to investors, and Joe LaForte's involvement with Par Funding.

Direct: 1 Hour.

May Call

5. 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.

Direct 2 Hours.

6. 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, Furman's interactions with investors, and Furman's disclosure and knowledge of various various issues in the case.

Direct 45 minutes.

7. 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 disclosures made by Furman.

Direct 30 minutes. Cross: 30 minutes

8. 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 relationship with AFPB Fidelis and Furman's efforts to raise funds, whether AFPB Fund was exempt from registration, and Fidelis and Furman's management.

Direct 1 Hour.

Respectfully submitted,

MILLENNIAL LAW, INC.

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Attorneys for Defendant, Michael C. Furman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **13th** 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