

**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.

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**MOTION FOR LEAVE TO FILE CONVENTIONALLY**

Dean Vagnozzi (“Dean”), Albert Vagnozzi (“Albert”), Alec Vagnozzi (“Alec”) (sometimes collectively referred to as the “Vagnozzis”), and Terry Kohler (“Kohler”), by and through undersigned counsel, Bochetto & Lentz, P.C. (“B&L”), hereby submit the following Motion for Leave to File Conventionally.

1. The Vagnozzis and Kohler hereby seek leave of Court to file conventionally Exhibits “5” and “6,” which are video recordings, with the Clerk of The Court.
2. On May 6, 2024, the Receiver filed a Motion to Entry Bar Order, ECF 1861.
3. On July 12, 2024, the Vagnozzis and Kohler filed their objections to the entry of the bar Order. *See* ECF 1987.
4. In support of their objections, the Vagnozzis and Kohler submitted two video recordings, identified as Exhibits 5 and 6.
5. The two video recordings, Ex. 5 [john\\_pauciulo\\_3\\_minute\\_summary](#) – compilation and Ex. 6 April 2018, were submitted to the Court on a thumb drive and to counsel via hyperlink.

6. The video recordings, attached as Ex. “5” and “6” could not be filed in electronic form.

7. Pursuant to the CM/ECF Administrative Procedures 3H(7), and pursuant to Local Rule 5.3 of the United States District Court for the Southern District of Florida, and in further anticipation of the Court Hearing, the Vagnozzi’s and Kohler hereby request leave of court to file and submit Exhibits “5” and “6” in conventional form (i.e. CD, DVD or Thumb Drive) to the Clerk of Courts and make those exhibits, part of the record.

**WHEREFORE**, the Vagnozzis and Kohler respectfully request that the Court grant this Motion for Leave to File Conventionally, Exhibits “5” and “6,” which were attached to Objections to the entry of the bar Order.

Respectfully submitted,

**BOCHETTO & LENTZ, P.C.**  
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Dated: July 22, 2024

*/s/ Matthew L. Minsky*

By: \_\_\_\_\_  
Matthew L. Minsky, Esquire  
FBN: 1033408

*/s/ George Bochetto*

By: \_\_\_\_\_  
George Bochetto, Esquire  
*Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that the foregoing document was electronically filed July 22, 2024, with the CM/ECF filing portal, which will send a notice of electronic filing to all counsel of record.

Respectfully submitted, this 22<sup>nd</sup> day of July 2024.

**BOCHETTO & LENTZ, P.C.**

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*/s/ Matthew L. Minsky*

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