

**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.

---

**ORDER GRANTING RECEIVER’S MOTION TO ESTABLISH ADDITIONAL  
PROCEDURES FOR MEDIATION IN CONNECTION WITH MOTION TO  
APPROVE SETTLEMENT WITH ECKERT SEAMANS**

**THIS CAUSE** comes before the Court upon the Receiver’s Motion to Establish Additional Procedures for Mediation in Connection with Motion to Approve Settlement with Eckert Seamans (“Motion”), [ECF No. 2034], filed on September 12, 2024. The Receiver has made a sufficient and proper showing in support of the relief requested. Accordingly, it is hereby

**ORDERED AND ADJUDGED** as follows:

1. The Receiver’s Motion is **GRANTED**.
2. The mediation conference in this matter among the Mediation Participants<sup>1</sup> in connection with the Receiver’s Motion for: (i) Approval of Settlement among Receiver, Putative

---

<sup>1</sup> The “Mediation Participants” are (i) the Receiver; (ii) Eckert Seamans Cherin & Mellott, LLC and its insurers; (iii) the putative investor class; (iv) Defendant Dean Vagnozzi and non-parties Alec Vagnozzi, Albert Vagnozzi, and Terry Kohler; (v) the Plaintiffs in the case of *Parker, et al. v. Pauciulo, et al.*, No. 20-00892 (Phila. Ct. Com. Pl. 2020); and (vi) B & T Supplies, Inc. d/b/a B and T Supply d/b/a Biggest Book.com; Tzvi Odzer; Ruben Azrak; RKDK Inc. d/b/a Haagen Dazs; Gelato on Hudson LLC d/b/a Haagen Dazs; Asia Star Broadcasting Inc.; Daniel Shah; Perfect Impression Inc.; Susan Abrahams; Kara Dipietro; Carl Dorvil; Pamela Fleetwood; Robert Fleetwood; Fleetwood Services LLC; Michael Joseph Foti; Chad

Class Plaintiffs, and Eckert Seamans; (ii) Approval of Form, Content, and Manner of Notice of Settlement and Bar Order; (iii) Setting a Deadline to Object to Approval of the Settlement and Entry of Bar Order; and (iv) Scheduling a Hearing; with Incorporated Memorandum of Law, [ECF No. 1861] (“Eckert Seamans Motion”), shall be held with the **Honorable Michael A. Hanzman (Ret.)** on **October 7, 2024, at 9:00 a.m.** at the offices of Bilzin Sumberg, 1450 Brickell Avenue, 23rd Floor, Miami, Florida 33131-3456, and will continue from day-to-day until the Mediation Participants reach a settlement or Judge Hanzman declares an impasse.

3. The Court previously ordered, [ECF No. 2006] at ¶ 3, that the costs of this mediation shall be split six ways, with one-sixth of the mediator’s fees to be paid for by each of the Mediation Participants. The Mediation Participants have agreed to modify this requirement as set forth in paragraphs 4 through 6 of this Order.

4. The Receiver is authorized to enter into the mediation retainer agreement with, and advance the mediation fee to, the mediator’s law office.

5. Prior to the first day of the in-person mediation session, each of the five other Mediation Participants must reimburse the Receiver for its respective one-sixth share of the mediation fee for two (2) days of the mediation.

6. At the conclusion of the mediation, Judge Hanzman will then, in his discretion, allocate the payment of fees for any additional days (unless the Mediation Participants are able to reach an agreement at the mediation to allocate payment of the remaining fees in a different manner).


---

Frost; Gex Management Inc; HMC, Inc; Johnny Harrison, Sr; Michael Heller; Julie Paula Katz; MH Marketing Solutions Group, Inc; Petropangea Inc; Radiant Images Inc; Sunrooms Group Inc; TourMappers NorthAmerica LLC; Volunteer Pharmacy, LLC; Sean Whalen; Giane Wolfe; and Iris Chen Yngyin.

7. The mediator is authorized, within his discretion, to determine which individuals from each of the groups comprising the Mediation Participants must attend the mediation in person and, conversely, which individuals may participate remotely via Zoom or otherwise be excused from attending the mediation because other in-person attendees at the mediation are representing their interests.

8. Upon conclusion of the mediation, the Mediation Participants shall file a status report indicating the outcome of the mediation, whether the stay of the Eckert Seamans Motion should remain in effect or be lifted, and whether the Final Approval Hearing on the Eckert Seamans Motion, which the Court previously canceled in an Order dated August 1, 2024, [ECF No. 2006], should be rescheduled.

**DONE AND ORDERED** in Miami, Florida, this 12th day of September, 2024.



---

**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

Copies to: Counsel of record