

**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.

**RECEIVER’S MOTION TO SUPPLEMENT MOTION
TO (1) APPROVE PROPOSED PLAN OF DISTRIBUTION
AND (2) AUTHORIZE FIRST INTERIM DISTRIBUTION**

Ryan K. Stumphauzer, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through his undersigned counsel, files this Motion to supplement his Motion to

¹ The “Receivership Entities” are Complete Business Solutions Group, Inc. d/b/a Par Funding (“CBSG”); Full Spectrum Processing, Inc.; ABetterFinancialPlan.com LLC d/b/a A Better Financial Plan; ABFP Management Company, LLC f/k/a Pillar Life Settlement Management Company, LLC; ABFP Income Fund, LLC; ABFP Income Fund 2, L.P.; United Fidelis Group Corp.; Fidelis Financial Planning LLC; Retirement Evolution Group, LLC; RE Income Fund LLC; RE Income Fund 2 LLC; ABFP Income Fund 3, LLC; ABFP Income Fund 4, LLC; ABFP Income Fund 6, LLC; ABFP Income Fund Parallel LLC; ABFP Income Fund 2 Parallel; ABFP Income Fund 3 Parallel; ABFP Income Fund 4 Parallel; and ABFP Income Fund 6 Parallel; ABFP Multi-Strategy Investment Fund LP; ABFP Multi-Strategy Fund 2 LP; MK Corporate Debt Investment Company LLC; Fast Advance Funding LLC; Beta Abigail, LLC; New Field Ventures, LLC; Heritage Business Consulting, Inc.; Eagle Six Consulting, Inc.; 20 N. 3rd St. Ltd.; 118 Olive PA LLC; 135-137 N. 3rd St. LLC; 205 B Arch St Management LLC; 242 S. 21st St. LLC; 300 Market St. LLC; 627-629 E. Girard LLC; 715 Sansom St. LLC; 803 S. 4th St. LLC; 861 N. 3rd St. LLC; 915-917 S. 11th LLC; 1250 N. 25th St. LLC; 1427 Melon St. LLC; 1530 Christian St. LLC; 1635 East Passyunk LLC; 1932 Spruce St. LLC; 4633 Walnut St. LLC; 1223 N. 25th St. LLC; 500 Fairmount Avenue, LLC; Liberty Eighth Avenue LLC; Blue Valley Holdings, LLC; LWP North LLC; The LME 2017 Family Trust; Recruiting and Marketing Resources, Inc.; Contract Financing Solutions, Inc.; Stone Harbor Processing LLC; LM Property Management

(1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution [ECF No. 2014] (the “Distribution Motion”), and states:

I. Introduction

On August 23, 2024, the Receiver filed the Distribution Motion. Through the subsequent process of reviewing information related to the Distribution Motion and responding to questions from Claimants, the Receiver has identified five portions of the Distribution Motion that require updating/supplementation:

First, due to an administrative error on the part of ABFP’s prior management, the Allowed Claim Amounts for two Claimants who invested in ABFP Income Fund 4 (and have similar last names) require amendment.

Second, due to an administrative error on the part of the bookkeeper who previously worked for Retirement Evolution prior to the appointment of the Receiver, the Allowed Claim Amounts for two Claimants who invested in the Retirement Evolution funds require amendment.

Third, there are seven Claimants who invested in the Retirement Evolution funds whose claims have not been included in the Distribution Plan because those claims were previously determined to be “late-filed claims.” Upon reviewing the circumstances surrounding the late submission of these investors’ claims, the Receiver believes it would be equitable to reclassify these seven Claims as “Allowed Claims” and include them in the Distribution Plan.

Fourth, CamaPlan, on behalf of one of its account holders, has an Allowed Claim in Fast Advance Funding that was not specifically referenced in the Receiver’s Distribution Plan. This account holder, William Bromley, is the co-owner of Capital Source 2000, Inc. (“CS2000”). Due

LLC; and ALB Management, LLC; and the receivership also includes the property located at 107 Quayside Dr., Jupiter FL 33477.

to his involvement in recruiting new investors for this fraudulent investment scheme, which operated as an affiliated merchant cash advance company to CBSG, Mr. Bromley should be designated as an “Insider Investor,” and his claim should be classified as a Class 8 Claim.

Fifth, the Receiver’s proposed Distribution Plan requests that the first interim distribution to certain agent funds, referred to as the “Parker Plaintiffs,” be held back and not distributed at the current time, due to a potential collateral source recovery the Parker Plaintiffs are pursuing through claims against Eckert Seamans. The Receiver recently learned that another agent fund, Pisces Income Fund, LLC (“Pisces”), which was managed by Shannon Westhead and Alec Vagnozzi, has joined the Parker Plaintiffs group and also intends to pursue an independent claim against Eckert Seamans. Thus, the Receiver proposes that Pisces’ claim be treated similarly to the claims of the Parker Plaintiffs, such that any distributions to Pisces are held back until such time that its independent claims seeking collateral recovery against Eckert Seamans are resolved.

These five amendments to the Distribution Motion are discussed in more detail below.

II. Amendments to Distribution Plan

A. Adjustment of Claim Amounts for Two Investors in ABFP Income Fund 4

There are two investors in ABFP Income Fund 4 who have Allowed Claims that require adjustment. The first Claimant (last name “Marks” and claim number 152) was determined to have an Allowed Claim Amount of \$1,472,500.00. The second Claimant (last name “Mark” and claim number 20177) was determined to have an Allowed Claim Amount of \$41,933.36. Upon further investigation, the Receiver has determined that ABFP’s prior management made an error when recording three interest payments that ABFP Income Fund 4 paid to Mr. Marks (claim number 152). Specifically, ABFP mistakenly recorded these three interest payments, each in the amount of \$17,500, as having been paid to Ms. Mark (claim number 20177).

These three interest payments should have been recorded as having been paid to Mr. Marks (claim number 152). The Receiver and his consultants have communicated this error to Ms. Mark and Mr. Marks, both of whom have acknowledged that this correction is appropriate. As a result of this adjustment, the Allowed Claim Amount for Ms. Mark should be increased by \$52,500, and the Allowed Claim Amount for Mr. Marks should be decreased by \$52,500. The adjusted Allowed Claim Amounts and proposed first interim distribution amounts for these two Claimants are:

<u>Investor</u>	<u>Claim No.</u>	<u>Original Allowed</u>	<u>Adjusted Allowed</u>	<u>Original First Distr.</u>	<u>Adjusted First Distr.</u>
K. Mark	20177	\$41,933.36	\$94,433.36	\$20,960.96	\$47,203.79
D. Marks	152	\$1,472,500.00	\$1,420,000.00	\$736,049.04	\$709,806.21

Because the increase for Ms. Marks is equivalent to the decrease for Mr. Marks, this adjustment will not impact the Allowed Claim Amounts or the proposed first interim distribution amounts for any other Claimants. An amended schedule of the Allowed Claim Amounts and proposed first interim distribution amounts for investors in the ABFP funds is attached as **Exhibit 1**, and the changes to the amounts for these two investors' claims is highlighted in grey.

B. Adjustment of Claim Amounts for Two Investors in Retirement Evolution

There are two investors in the Retirement Evolution funds who have Allowed Claims that require adjustment. The first Claimant (initials of MA and claim number 100) was previously determined to have an Allowed Claim Amount of \$192,501.00. Due to an administrative error on the part of the former bookkeeper for Retirement Evolution who verified these claim amounts, that Allowed Claim Amount should have been \$232,501.00. The second Claimant (initials of WP and claim number 424) was previously determined to have an Allowed Claim Amount of \$180,733.36. Due to a similar error, the Allowed Claim Amount for that Claimant should have been

\$185,000.00. The adjustments to these two Allowed Claims will impact the calculation of the proposed first interim distribution amounts for these two Claimants, as well as all other Claimants with Allowed Claims against the Retirement Evolution funds. These adjustments are reflected in the amended schedule of the Allowed Claim Amounts and proposed first interim distribution amounts for investors in the Retirement Evolution funds, which is attached as **Exhibit 2**.

C. Additional Claims for Seven Investors in Retirement Evolution

There are seven investors in the Retirement Evolution funds whose claims were previously excluded from the distribution analysis because they were considered to be “late-filed claims.” John Gissas—the former manager of the Retirement Evolution funds—initially filed a claim in the receivership that was purportedly on behalf of himself “and his victimized clients.” (See **Exhibit 3**, Claim Number 20702 from John Gissas). Based on information these seven Claimants apparently received from Mr. Gissas, it has been represented to the Receiver that these investors were not aware of the requirement for each of them to submit their own Proofs of Claim.

On April 22, 2024, the Receiver filed his Motion (1) to Approve Claims Determinations and (2) for Ponzi Determination [ECF No. 1843] (the “Claims Motion”). In the Claims Motion, the Receiver recommended that Mr. Gissas’s claims be disallowed due to his status as an insider. (See Claims Motion at 22, 37). In addition, because the Retirement Evolution funds are Receivership Entities, the claims process required investors in those funds to submit their own Proofs of Claim, which many of the individual investors in those funds did, but these seven Claimants did not.

In September 2023, the Statewide Prosecutor for the State of Florida charged Mr. Gissas with 58 counts of criminal fraud and securities violations through an Amended Information. (See Amended Information, *State of Florida v. John Gissas*, Case No. 2023-CF-1218 (5th Jud. Cir.,

Sumter County, Fla., Sep. 28, 2023), attached as **Exhibit 4**). Mr. Gissas was arrested on September 28, 2023, and held on pre-trial detention at the Sumter County Detention Center until he was able to post an appearance bond on October 27, 2023. (See Arrest Warrant, attached as **Exhibit 5**, and Appearance Bond, attached as **Exhibit 6**). As a condition of his pre-trial release, Mr. Gissas has been prohibited from contacting any victims of the fraud and securities violations detailed in the Amended Information, which relate to his promotion of investments in the Retirement Evolution funds. (See Order on Defendant's Amended Stipulated Motion to Determine Conditions of Pretrial Detention Hold Have Been Satisfied, *State of Florida v. John Gissas*, Case No. 2023-CF-1218 (5th Jud. Cir., Sumter County, Fla., Nov. 3, 2023), attached as **Exhibit 7**).

On April 23, 2024, this Court established a briefing schedule for claimants to file responses to the Receiver's Claims Motion. [ECF No. 1845]. The Receiver has been advised that these seven investors were unaware of the Claims Motion or the briefing schedule and, therefore, did not know that the Receiver was recommending rejection of Mr. Gissas's claim, which was purportedly on behalf of his "victimized clients." Additionally, given that Mr. Gissas was prohibited under the conditions of his pretrial release from communicating with investors in the Retirement Evolution funds at the time a response to the Claims Motion was due, it is reasonable to conclude that these seven investors might not have been aware of the status of these proceedings or the need to assert their own individual claims in the receivership.

Thereafter, on June 26, 2024, the Receiver received late-filed claims for these seven investors. The Receiver initially believed that these seven claims should be treated as late-filed and, therefore, disallowed claims. Upon learning of the foregoing circumstances, however, the Receiver now believes that these late-filed claims should be recharacterized as Allowed Claims and included within the Receiver's Distribution Plan. These seven claims are:

<u>Investor</u>	<u>Claim No.</u>	<u>Allowed Claim</u>	<u>First Distr.</u>
D.L.	549	\$45,336.34	\$23,920.80
R.T.	550	\$18,866.66	\$9,954.61
L.S.	551	\$169,158.17	\$89,252.89
J.L.	552	\$24,733.32	\$13,050.04
A.L.	553	\$50,000.00	\$26,381.49
J.F.L.T.	554	\$91,000.00	\$48,014.31
G.R.	555	\$39,893.18	\$21,048.83

Because these adjustments will result in additional Allowed Claims within the Retirement Evolution funds, the calculation of the proposed first interim distribution amounts for all Claimants with Allowed Claims against the Retirement Evolution funds will need to be adjusted. As referenced in Section B of this motion, attached as **Exhibit 2** is an amended schedule of the proposed first interim distributions to the investors in the Retirement Evolution Funds, which reflects these changes. These seven additional Claimants are highlighted in grey.

D. William Bromley’s Claim against Fast Advance Funding is a Class 8 Claim

William Bromley is a co-owner of CS2000. He also invested money in Fast Advance Funding, CBSG’s “in-house broker” that sourced potential MCA opportunities for the company. (See **Exhibit 8**, Par Funding Investor Presentation dated August 29, 2014, at p. 7). As part of the claims process in this receivership, Bromley submitted a Proof of Claim and was deemed to have an Allowed Claim—which was through a self-directed individual retirement account at CamaPlan—in the amount of \$88,328. This claim against Fast Advance Funding was not specifically addressed in the Receiver’s proposed first interim distribution.

Bromley is an “Insider Investor” and, therefore, his claim should be classified as a Class 8 Claim under the Receiver’s proposed Distribution Plan. In 2015, Bromley and Cole set up CS2000 to operate as a sister company to CBSG. Bromley and Cole each had their separate roles in the operation. Bromley identified a number of investors who were looking to invest in a merchant cash advance business. (See **Exhibit 9**, Email dated August 17, 2015). Cole, on the other hand, was able to offer CBSG’s existing business platform to serve as the operational arm for CS2000. (See **Exhibit 10**, Email dated December 1, 2015, and MCA Receivables Operating Agreement).

Pursuant to an “MCA Receivables Operating Agreement,” CBSG generated sales leads and solicited the MCA customers, performed the underwriting, documented the agreements, utilized its collections team to collect on the advances, maintained the records for the MCA deals, and otherwise serviced the MCA customers on behalf of CS2000. (*Id.*). In exchange for these services, CS2000 agreed to pay CBSG a 14% management fee based on the gross amount of funding that CBSG advanced to these merchants on CS2000’s behalf. (*Id.*). In other words, CS2000 was working in tandem with CBSG in providing merchant cash advances to merchants, and Bromley was responsible for identifying the investors whose money would be used to fund this operation.

In the Distribution Motion, the Receiver described CS2000 as an “Insider Investor.” (Distribution Motion at pp. 40-42). The Court agreed with this characterization. (ECF No. 1976 at 41). For the same reasons, Bromley, who was the main fundraiser for CS2000, should similarly be characterized as an Insider Investor. See *Basic Energy & Affiliated Res., Inc.*, 273 F.3d at 660–61, 667 (upholding distribution plan that reduced the recovery for any investor who received a commission for referring additional investors). This is so, even if Bromley might claim not to have known that CBSG was operating as a Ponzi scheme and defrauding its investors. See *SEC v. Merrill Scott & Assocs., Ltd.*, No. 2:02-cv-39, 2006 WL 3813320, at *11 (D. Utah Dec. 26, 2006)

(approving distribution plan that excluded an investor who claimed to have no knowledge of the fraudulent nature of the investment scheme because he was an “insider” who was involved in the operation of the scheme and allowed his name to be used to recruit additional investors); *SEC v. Pension Fund of Am. L.C.*, 377 F. App’x 957, 963 (11th Cir. 2001) (upholding distribution plan that excluded a sales agent who received commissions for recruiting investors, even though the agent had no knowledge the pension fund was a fraudulent investment scheme). Accordingly, the Receiver recommends that Bromley’s claim, which was submitted by CamaPlan on his behalf, be relegated to a Class 8 Claim. Because Class 8 Claims are not scheduled to receive a distribution under the Distribution Plan, this classification will not impact the proposed distributions to any other Claimants.

E. Any Distributions to Pisces Income Fund, LLC Should be Held Back Until its Claim for Collateral Recovery Against Eckert Seamans is Resolved.

In the Receiver’s Distribution Motion, the Receiver explains that distributions should be allocated to the claims of the “Parker Plaintiffs,” but not distributed at this time, given their efforts in pursuing collateral sources of recovery, namely direct claims against Eckert Seamans and John Pauciulo. (Distribution Motion at 63). As described in the Distribution Motion (*id.* at 63-64) and the Receiver’s reply to the Parker Plaintiffs’ objection to the Distribution Motion (ECF No. 2045), holding back these distributions is fair and equitable, and well supported under the applicable caselaw.

The Receiver recently confirmed that Shannon Westhead, as the manager on behalf of the Pisces agent fund, is now represented by counsel for the Parker Plaintiffs, and also intends to pursue independent claims against Eckert Seamans. (See **Exhibit 11**, Email from E. Belfer dated Sep. 20, 2024). For the same reason the Receiver proposed this relief against the Parker Plaintiffs, the Receiver proposes that the Distribution Plan allocate to Pisces its proportionate share of the

first interim distribution, but not permit the distribution of those funds to Pisces until there is a final resolution and determination regarding its separate claims against (and potential recovery from) Eckert Seamans and its insurers.

Like with the Parker Plaintiffs, the Receiver doubts that Westhead and her agent fund will ultimately be successful in their separate litigation efforts against Eckert Seamans. If they are, however, it would be inequitable for Pisces to receive a sizable Distribution from the Receiver's Distribution Plan, and then obtain a disproportionate additional recovery from another source, which would place their total recovery at a much greater percentage of their net-investment loss than other similarly-situated investors. Accordingly, the Receiver requests that the Court treat Pisces' claim similarly, and hold back any distributions to Pisces until such time that its claims seeking collateral recovery against Eckert Seamans are resolved.

V. Conclusion

WHEREFORE, the Receiver requests that the Court consider the amendments to his Distribution Motion, as set forth herein: (a) to revise the allowed Claim amounts for two Claimants with Allowed Claims against ABFP Income Fund 4; (b) to revise the allowed claim amounts for two Claimants with claims against the Retirement Evolution funds; (c) to add claims on behalf of seven Claimants with late-filed claims against the Retirement Evolution Funds, which will impact the proposed first interim distribution amounts for all investors with Allowed Claims against the Retirement Evolution funds; (d) to clarify that the claim CamaPlan submitted on behalf of William Bromley against Fast Advance Funding is to be characterized as a Class 8 Claim; and (e) to treat the claim from Pisces similarly to the claims of the Parker Plaintiffs, and hold back any distributions to Pisces until such time that its claims seeking collateral recovery against Eckert Seamans are resolved.

The Receiver recommends that claimants be afforded two weeks to respond to this motion and, if appropriate, oppose the proposed treatment of their claims as outlined herein. The Receiver would then file a reply, if necessary, within seven days thereafter, and recommends that the Court's ruling on the proposed treatment of these claims be incorporated into the Court's overall Order on the Distribution Motion. A proposed Order establishing a briefing schedule on this motion is attached as **Exhibit 12**.

Dated: September 23, 2024

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 23, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Timothy A. Kolaya

TIMOTHY A. KOLAYA

Exhibit “1”

CBSG et al Receivership**Distribution Analysis - ABFP Entities**

Creditor	Claim #	Allowed	First Distr.
<u>ABFP INCOME FUND</u>			
<u>INVESTORS</u>	Amount to distribute:		\$5,444,981.80
EVB	125	\$40,916.59	\$15,053.29
MAN	20406	\$58,718.66	\$21,602.71
J&HD	230	\$63,600.00	\$23,398.57
MK	252	\$77,333.34	\$28,451.09
CW	20700	\$82,751.59	\$30,444.47
JLT	20127	\$82,751.59	\$30,444.47
P&KA	20561	\$83,159.96	\$30,594.71
MTS	237	\$87,693.30	\$32,262.54
F&AV	254	\$97,559.96	\$35,892.50
RF	20552	\$122,850.00	\$45,196.76
TJ&PMC	93	\$143,246.00	\$52,700.49
PF	20342	\$155,540.00	\$57,223.47
GRC	81	\$157,500.00	\$57,944.56
REK	349	\$157,550.00	\$57,962.96
SI	20413	\$157,550.00	\$57,962.96
TC&HLA	48	\$158,300.00	\$58,238.88
KAVH	20020	\$162,500.00	\$59,784.07
CP	20344	\$164,391.65	\$60,480.01
DH	7	\$164,500.00	\$60,519.88
AS&RB	20391	\$169,579.96	\$62,388.80
MRaLLS	20271	\$176,833.34	\$65,057.34
KD	43	\$196,966.66	\$72,464.42
A&JB	263	\$200,666.66	\$73,825.66
NB	20349	\$232,100.00	\$85,390.05
KJT	20398	\$234,266.66	\$86,187.17
DM	115	\$235,100.00	\$86,493.76
DLA	378	\$244,773.34	\$90,052.60
DES	20264	\$286,146.74	\$105,273.95
PHM	162	\$290,725.07	\$106,958.33
M&GC	113	\$304,706.06	\$112,101.96
RLA	310	\$380,880.00	\$140,126.51
JR&MBS	289	\$428,050.00	\$157,480.44
SHLF	345	\$439,230.84	\$161,593.90
DJHRL	20535	\$447,751.93	\$164,728.82
DKaBB	20245	\$482,771.69	\$177,612.66
DCVL	20455	\$560,543.38	\$206,225.02
R&SG	63	\$594,666.66	\$218,779.04
DKaBB	20246	\$482,771.69	\$177,612.66
CAMAPLAN	Bulk	\$6,193,145.00	\$2,278,470.31
Total ABFP Income Fund Investor Claim		\$14,800,088.32	\$5,444,981.80
		Distribution %	36.8%

ABFP INCOME FUND 2

<u>INVESTORS</u>	Amount to distribute:		\$3,961,289.69
RF	65	\$38,864.89	\$23,634.00
DWS	348	\$42,501.65	\$25,845.54
VNV	327	\$43,645.47	\$26,541.10
SNG	20339	\$50,981.96	\$31,002.47
SCC	20519	\$54,291.02	\$33,014.73

Creditor	Claim #	Allowed	First Distr.
WFS	156	\$57,584.67	\$35,017.62
BS&DMN	513	\$61,220.82	\$37,228.79
KMB	521	\$62,072.95	\$37,746.98
NP&HNS	184	\$63,977.51	\$38,905.15
AAP	20560	\$64,613.11	\$39,291.67
BK	20126	\$73,868.91	\$44,920.18
MG	20077	\$77,076.15	\$46,870.52
GJM	20594	\$80,000.00	\$48,648.54
BK&LR	373	\$81,494.33	\$49,557.25
PM	199	\$81,594.33	\$49,618.06
JL	461	\$81,594.33	\$49,618.06
SaCG	20499	\$81,594.33	\$49,618.06
M&CC	68	\$82,363.83	\$50,086.00
DB&JK	192	\$83,133.33	\$50,553.94
MG	317	\$83,133.33	\$50,553.94
BC	490	\$83,133.33	\$50,553.94
RRD	519	\$83,133.33	\$50,553.94
JLR	20065	\$83,133.33	\$50,553.94
PY	20480	\$83,902.83	\$51,021.87
J&KR	383	\$84,902.96	\$51,630.06
DW&JAS	20373	\$84,903.26	\$51,630.24
MS	20557	\$84,903.26	\$51,630.24
SS	20576	\$86,017.41	\$52,307.76
WF&RG	332	\$86,117.40	\$52,368.57
BC	20019	\$86,117.41	\$52,368.57
DR	234	\$97,355.52	\$59,202.55
MS	527	\$117,262.38	\$71,308.04
RF	20283	\$122,031.83	\$74,208.37
ECD	324	\$124,550.00	\$75,739.69
GWCI	47	\$164,527.67	\$100,050.38
AB	20422	\$165,259.67	\$100,495.51
JRJ	299	\$170,488.30	\$103,675.08
RAMI	20015	\$172,774.58	\$105,065.38
JL	20294	\$202,358.64	\$123,055.65
B&JC	416	\$203,735.82	\$123,893.12
JJ&JEC	316	\$301,060.94	\$183,077.18
CAMAPLAN	Bulk	\$2,480,859.00	\$1,508,627.01
Total ABFP Income Fund 2 Investor Claims		\$6,514,135.79	\$3,961,289.69
		Distribution %	60.8%

ABFP INCOME FUND 3

INVESTORS	Amount to distribute:	\$11,884,565.42
RJ	117	\$23,876.63
JKK	219	\$46,433.36
RS&KM	20181	\$46,433.36
JS	135	\$46,766.69
STSL	20396	\$46,766.69
M&MH	20095	\$47,333.35
WK&GMH	190	\$56,800.00
CV	20204	\$67,625.00
JET	46	\$70,125.00
WCW	133	\$89,433.38
JB	20057	\$90,166.71
JDN	253	\$91,068.29
WR	363	\$91,099.29

Creditor	Claim #	Allowed	First Distr.
JC	102	\$91,168.29	\$42,526.90
JG	336	\$91,168.29	\$42,526.90
MG	20078	\$91,168.29	\$42,526.90
R&KF	20282	\$91,168.29	\$42,526.90
SM	20265	\$91,909.96	\$42,872.86
AD	77	\$91,909.96	\$42,872.86
WFS	155	\$91,909.96	\$42,872.86
GS	20190	\$91,909.96	\$42,872.86
W&MC	20447	\$91,909.96	\$42,872.86
DHJJ	84	\$92,009.96	\$42,919.51
JIL	20290	\$92,009.96	\$42,919.51
PVP&HNS	185	\$92,009.96	\$42,919.51
G&MM	26	\$92,751.63	\$43,265.47
MH	20518	\$92,751.63	\$43,265.47
NJF	61	\$92,751.63	\$43,265.47
K&MW	20062	\$92,751.63	\$43,265.47
BM&FJOJ	55	\$92,851.63	\$43,312.12
DLC	303	\$93,693.30	\$43,704.73
KMB	522	\$93,693.30	\$43,704.73
A&MEP	20641	\$93,693.30	\$43,704.73
W&CS	260	\$93,693.30	\$43,704.73
JD	547	\$93,693.30	\$43,704.73
JA&DRW	20172	\$93,693.30	\$43,704.73
KE	20216	\$93,693.30	\$43,704.73
WP	19	\$94,200.04	\$43,941.10
JJM	335	\$94,434.97	\$44,050.69
DB	193	\$94,775.00	\$44,209.30
NP&HNS	183	\$94,775.00	\$44,209.30
FA&CCW	20212	\$96,118.31	\$44,835.91
CMS	242	\$96,218.31	\$44,882.56
LD	20621	\$97,059.98	\$45,275.17
JAS	241	\$97,801.65	\$45,621.13
RN&JLB	182	\$100,326.66	\$46,798.96
RPI	70	\$102,949.97	\$48,022.65
RL	20215	\$108,300.00	\$50,518.25
JCH	20739	\$108,300.00	\$50,518.25
DTM	20219	\$111,200.00	\$51,871.00
MS	20110	\$112,300.00	\$52,384.12
LL	20362	\$112,808.29	\$52,621.22
RW	20268	\$113,300.00	\$52,850.58
ESTATE OF JKS	20675	\$114,791.63	\$53,546.38
CS	20137	\$119,483.37	\$55,734.91
J&SSG	64	\$136,088.31	\$63,480.55
WPBJ	20025	\$137,750.00	\$64,255.67
ASR	38	\$138,534.93	\$64,621.82
WMK	153	\$139,100.00	\$64,885.40
G&MZ	217	\$142,136.63	\$66,301.89
SJ&KAB	114	\$150,150.00	\$70,039.85
JAM	215	\$154,733.35	\$72,177.83
RN&JLB	181	\$175,266.60	\$81,755.89
MTS	257	\$180,333.29	\$84,119.32
DW&JAS	20374	\$180,433.29	\$84,165.97
JLS	20477	\$180,433.29	\$84,165.97
RF	20105	\$181,999.96	\$84,896.77
HL	20241	\$182,099.96	\$84,943.42

Creditor	Claim #	Allowed	First Distr.
T&JD	116	\$182,099.96	\$84,943.42
JRKJ	20672	\$183,666.63	\$85,674.21
EAR	20476	\$183,666.63	\$85,674.21
TGD&GJM	20474	\$183,766.63	\$85,720.86
JM	20367	\$186,344.93	\$86,923.55
W&MM	10	\$187,099.97	\$87,275.75
RWM	20093	\$214,500.00	\$100,056.93
DER	20478	\$225,516.71	\$105,195.85
PMCS	20295	\$231,666.70	\$108,064.61
G&OE	120	\$233,750.03	\$109,036.41
MDW	20732	\$236,780.00	\$110,449.79
SRT	20252	\$270,600.00	\$126,225.66
GJN	277	\$278,833.33	\$130,066.23
LG&JPS	20390	\$280,500.00	\$130,843.68
RF	20203	\$315,066.70	\$146,967.86
PHM	161	\$315,583.29	\$147,208.83
RSD&DLG	20254	\$369,199.93	\$172,219.17
PROVIDENT TRUST GROUP LLC, F/B/O LEL IRA	151	\$369,324.97	\$172,277.49
JESJ&BSD TRUST	290	\$385,700.00	\$179,915.88
IAPL	20048	\$454,999.96	\$212,241.95
JC	20136	\$556,100.00	\$259,401.67
RM	402	\$593,999.96	\$277,080.71
EWC	20042	\$676,350.00	\$315,494.19
AL	20068	\$901,666.71	\$420,596.74
RJD	20333	\$1,377,599.99	\$642,603.37
CAMAPLAN	Bulk	\$9,101,411.00	\$4,245,497.57
Total ABFP Income Fund 3 Investor Claims		\$25,477,888.66	\$11,884,565.42
		Distribution %	46.6%

ABFP INCOME FUND 4

\$9,291,574.10

84,078.46

INVESTORS

Amount to distribute: \$9,375,652.56

CMZ	398	\$38,066.69	\$19,028.15
AKR	20623	\$39,148.34	\$19,568.83
KLM	20177	\$94,433.36	\$47,203.79
M&JM	216	\$46,766.66	\$23,376.95
JL	202	\$47,683.31	\$23,835.15
JR	224	\$47,683.31	\$23,835.15
SGR	20651	\$47,683.31	\$23,835.15
WP	21	\$48,416.65	\$24,201.72
BS	20202	\$48,833.32	\$24,410.00
MS	20111	\$57,200.00	\$28,592.19
MH	164	\$71,375.00	\$35,677.76
RHB	80	\$94,333.36	\$47,153.81
J&TK	220	\$94,433.36	\$47,203.79
VJO	275	\$94,433.36	\$47,203.79
KFT	408	\$94,433.36	\$47,203.79
MMN	381	\$94,433.36	\$47,203.79
B&JR	20284	\$94,433.36	\$47,203.79
RHP	239	\$95,166.69	\$47,570.36
NWH	306	\$95,166.69	\$47,570.36
GD	20745	\$95,266.69	\$47,620.34
JP&MGB	340	\$95,276.64	\$47,625.32
KG	20380	\$100,800.00	\$50,386.24

Creditor	Claim #	Allowed	First Distr.
DF&KY	31	\$108,583.36	\$54,276.86
W&LS	39	\$113,300.00	\$56,634.54
FD	140	\$114,200.00	\$57,084.41
V&JC	20378	\$114,200.00	\$57,084.41
NS&TJJS	119	\$114,300.00	\$57,134.40
RW	20258	\$114,300.00	\$57,134.40
CS	471	\$116,103.31	\$58,035.81
JRW	225	\$118,016.64	\$58,992.21
TMF	391	\$118,016.64	\$58,992.21
RPI	72	\$123,716.69	\$61,841.46
JB	136	\$132,350.00	\$66,156.94
MGDMGIL	379	\$141,600.00	\$70,780.68
G&PG	20440	\$141,600.00	\$70,780.68
PR&LJH	41	\$169,900.00	\$84,926.81
JLR	20067	\$188,666.64	\$94,307.57
TYJ	20415	\$188,766.64	\$94,357.56
R&CW	187	\$190,333.31	\$95,140.68
EOJT	545	\$200,000.00	\$99,972.71
MYS	201	\$208,948.93	\$104,445.95
RDS	20175	\$234,266.66	\$117,101.36
SGG	20534	\$234,436.66	\$117,186.34
ATB	296	\$236,776.66	\$118,356.02
NJF	62	\$236,776.66	\$118,356.02
DR	20449	\$242,666.66	\$121,300.21
HWF	29	\$245,266.66	\$122,599.86
G&AB	20278	\$256,666.66	\$128,298.30
RH	2	\$280,000.00	\$139,961.79
RDS&KLMC	20180	\$280,100.00	\$140,011.77
ESTATE OF PS	20441	\$326,766.66	\$163,338.74
DTM	20220	\$336,000.00	\$167,954.15
MFPL	20221	\$377,333.34	\$188,615.17
G&JF	330	\$378,675.00	\$189,285.82
TM	221	\$462,590.00	\$231,231.87
DJ&MJK	137	\$468,435.00	\$234,153.57
CS	20270	\$473,770.00	\$236,820.34
JS	16	\$474,280.00	\$237,075.27
G&MC	212	\$561,000.00	\$280,423.44
EJB	3	\$789,550.00	\$394,667.25
DWM	152	\$1,420,000.00	\$709,806.21
CAMAPLAN	Bulk	\$6,088,699.00	\$3,043,518.56
Total ABFP Income Fund 4 Investor Claims		\$18,756,424.60	\$9,375,652.56
		Distribution %	50.0%

ABFP INCOME FUND 6

INVESTORS

	Amount to distribute:		\$8,746,300.34
G&BD	20490	\$24,416.68	\$13,055.32
CP	441	\$48,833.32	\$26,110.63
JWH	20371	\$49,349.99	\$26,386.89
MDH	20214	\$49,416.66	\$26,422.53
MDGJ	20372	\$58,700.00	\$31,386.23
JCZ	344	\$59,600.00	\$31,867.45
DP	177	\$97,666.68	\$52,221.28
D&LR	283	\$97,666.68	\$52,221.28
LCBJ	20041	\$97,666.68	\$52,221.28
DW	20044	\$97,666.68	\$52,221.28

Creditor	Claim #	Allowed	First Distr.
DR	20448	\$97,666.68	\$52,221.28
P&JT	14	\$97,766.68	\$52,274.74
MG	20079	\$97,766.68	\$52,274.74
BWR	20045	\$97,766.68	\$52,274.74
WJP	20663	\$98,500.01	\$52,666.85
MC	245	\$98,500.01	\$52,666.85
FP	250	\$98,500.01	\$52,666.85
BAS	20108	\$98,500.01	\$52,666.85
JES	395	\$98,500.01	\$52,666.85
RL	20166	\$98,500.01	\$52,666.85
LD&MCB	90	\$98,600.01	\$52,720.32
RGF, Individually & Executrix for EF, Sr.	318	\$99,333.34	\$53,112.42
DRD	466	\$99,333.34	\$53,112.42
KEM&LY	165	\$99,333.34	\$53,112.42
KA	20314	\$99,333.34	\$53,112.42
R&NC	20660	\$99,333.34	\$53,112.42
RSSJ	6	\$99,433.34	\$53,165.89
EA&LMC	20464	\$99,433.34	\$53,165.89
K&MW	20062	\$99,433.34	\$53,165.89
J&FC	20401	\$113,375.01	\$60,620.34
RW	20259	\$118,200.00	\$63,200.21
ECD	20299	\$120,618.32	\$64,493.26
PD	124	\$146,500.00	\$78,331.90
DW&JAS	20375	\$146,600.00	\$78,385.37
SAS	338	\$147,750.00	\$79,000.26
ESTATE OF JRKS	20674	\$173,833.34	\$92,946.73
J&SS	82	\$195,433.32	\$104,496.00
PHM	163	\$196,999.99	\$105,333.68
RJD	20334	\$196,999.99	\$105,333.68
JVMI	20409	\$198,666.66	\$106,224.83
RPI	75	\$227,746.67	\$121,773.58
WaCS	20613	\$244,306.66	\$130,628.03
CPM	179	\$244,306.66	\$130,628.03
N&ES	13	\$244,406.66	\$130,681.49
MM	375	\$246,816.66	\$131,970.09
RVG	20617	\$247,800.00	\$132,495.87
HG	129	\$249,326.66	\$133,312.16
DD	232	\$249,326.66	\$133,312.16
N&RR	388	\$249,326.66	\$133,312.16
JRKJ	20671	\$249,426.66	\$133,365.63
HWF	28	\$253,066.66	\$135,311.90
AY	208	\$268,300.00	\$143,456.99
ZM&KD	20347	\$292,100.00	\$156,182.59
JB	105	\$295,000.00	\$157,733.18
KM	20525	\$298,000.00	\$159,337.25
JESJ&BSDT	291	\$350,400.00	\$187,354.94
JM	20191	\$393,333.34	\$210,310.92
CJ&LAP	20001	\$485,970.00	\$259,842.70
DPR	83	\$486,070.00	\$259,896.17
JHC	447	\$491,915.00	\$263,021.42
AO	20186	\$687,166.67	\$367,420.30
CAMAPLAN	Bulk	\$5,292,136.00	\$2,829,645.64
Total ABFP Income Fund 6 Investor Claims		\$16,357,741.13	\$8,746,300.34
		Distribution %	53.5%

Creditor	Claim #	Allowed	First Distr.
ABFP MULTI STRATEGY INVESTMENT FUND			
INVESTORS	Amount to distribute:		\$3,791,180.10
JDB	353	\$92,292.44	\$22,247.52
ESTATE OF FPJB	427	\$92,292.44	\$22,247.52
CP	443	\$92,292.44	\$22,247.52
JC	20028	\$92,292.44	\$22,247.52
SS	20577	\$92,292.44	\$22,247.52
DR	20307	\$110,750.94	\$26,697.03
P&KA	20562	\$115,365.56	\$27,809.40
HT	20471	\$138,138.00	\$33,298.81
TJ&PMC	107	\$138,438.67	\$33,371.28
CPL	141	\$138,438.67	\$33,371.28
KEM	166	\$138,438.67	\$33,371.28
DM	236	\$138,438.67	\$33,371.28
KMB	520	\$138,438.67	\$33,371.28
DK	20247	\$138,438.67	\$33,371.28
RaCP	20494	\$138,438.67	\$33,371.28
AP	20634	\$138,438.67	\$33,371.28
WR	362	\$138,530.97	\$33,393.53
E&LC	434	\$147,667.92	\$35,596.04
ED	20444	\$166,126.41	\$40,045.54
RHP	240	\$184,584.90	\$44,495.05
NB	20351	\$184,584.90	\$44,495.05
DG	20377	\$184,584.90	\$44,495.05
DB	20604	\$184,584.90	\$44,495.05
MDW	20734	\$184,584.90	\$44,495.05
LHBL	20513	\$185,507.82	\$44,717.52
DF&KY	30	\$203,043.39	\$48,944.55
VML, INDIV. AND PERSONAL REP. OF EST. OF DBL	449	\$207,658.01	\$50,056.93
B&JC	415	\$276,877.34	\$66,742.57
JCW	537	\$369,169.80	\$88,990.10
ESL&ED	111	\$461,462.24	\$111,237.62
CAMAPLAN	Bulk	\$10,715,277.00	\$2,582,967.33
Total ABFP Multi Strategy Investment Fund Inv. Claim		\$15,727,471.46	\$3,791,180.10
		Distribution %	24.1%

INSIDERS	Amount to distribute:		\$0.00
SHANNON WESTHEAD	430	\$46,146.23	\$0.00
Total Insider Claims		\$46,146.23	\$0.00

ABFP MULTI STRATEGY INVESTMENT FUND II

INVESTORS	Amount to distribute:		\$6,671,960.16
L&LR	20315	\$48,587.00	\$30,383.33
CMS	244	\$50,000.00	\$31,266.93
FP	251	\$51,851.37	\$32,424.66
JES	394	\$72,880.00	\$45,574.68
SS	20359	\$72,880.00	\$45,574.68
EW	20508	\$72,880.00	\$45,574.68
UML	96	\$97,173.00	\$60,766.03
CBR	168	\$97,173.00	\$60,766.03
CPM	180	\$97,173.00	\$60,766.03
CMS	243	\$97,173.00	\$60,766.03
DPAJMM	276	\$97,173.00	\$60,766.03
MMN	380	\$97,173.00	\$60,766.03
DJO	505	\$97,173.00	\$60,766.03

Creditor	Claim #	Allowed	First Distr.
JaIK	20253	\$97,173.00	\$60,766.03
BA	20397	\$97,173.00	\$60,766.03
MN	518	\$97,173.00	\$60,766.03
CN	92	\$145,760.00	\$91,149.35
HP&EAGI	347	\$145,760.00	\$91,149.35
B&BC	20082	\$145,760.00	\$91,149.35
KLM	20178	\$145,760.00	\$91,149.35
MDW	20735	\$145,760.00	\$91,149.35
KJT	20398	\$145,760.00	\$91,149.35
MS	20112	\$155,477.00	\$97,225.77
RDS&KLMC	20179	\$170,053.00	\$106,340.70
MDM	20149	\$194,347.00	\$121,532.68
RTOMKH	97	\$250,000.00	\$156,334.64
JS	259	\$252,651.00	\$157,992.42
JWB	20272	\$400,000.00	\$250,135.43
WCS	20615	\$485,867.00	\$303,831.38
CAMAPLAN	Bulk	\$6,545,593.00	\$4,093,211.83
Total ABFP Multi Strategy Investment Fund Inv. II Claim		\$10,669,356.37	\$6,671,960.16
		Distribution %	62.5%

abetterfinancialplan.com

EMPLOYEES

Amount to distribute:			
			\$0.00
AB	20281	\$1,974.36	\$0.00
AZ	20293	\$2,692.31	\$0.00
KG	20280	\$4,461.54	\$0.00
MP	20352	\$6,904.94	\$0.00
MJT	258	\$0.00	\$0.00
Total abetterfinancialplan.com Employee Claims		\$16,033.15	\$0.00
		Distribution %	0.0%

Exhibit “2”

CBSG et al Receivership**Distribution Analysis - Retirement Evolution**

Creditor	Claim #	Allowed	First Distr.
INVESTORS	Amount to distribute:		\$6,133,010.15
SEJ	468	\$9,266.63	\$4,889.35
JB	534	\$26,100.00	\$13,771.14
HB	533	\$33,041.67	\$17,433.77
WBE	467	\$79,050.00	\$41,709.14
CG&SS	308	\$126,900.00	\$66,956.22
GAS	287	\$13,334.41	\$7,035.63
SEL	498	\$14,784.03	\$7,800.49
CI	20090	\$18,515.03	\$9,769.08
MW	20197	\$19,333.35	\$10,200.85
RI	20052	\$35,225.36	\$18,585.95
M&SD	392	\$38,266.65	\$20,190.63
GAFFRDF	436	\$50,000.00	\$26,381.49
PB	20392	\$65,999.98	\$34,823.56
LLE	49	\$98,700.00	\$52,077.06
R&MD	20676	\$237,500.02	\$125,312.09
RM&LL	20410	\$309,589.00	\$163,348.38
LC	20131	\$38,640.35	\$20,387.80
RSI	20646	\$32,507.68	\$17,152.02
FF	186	\$23,499.97	\$12,399.28
JA	132	\$24,373.34	\$12,860.10
LS	203	\$30,772.50	\$16,236.49
CLR	204	\$46,625.00	\$24,600.74
MBL	267	\$60,000.00	\$31,657.79
LW	188	\$77,363.36	\$40,819.21
THLT	292	\$21,600.00	\$11,396.80
WDL	506	\$99,050.00	\$52,261.73
BC	20432	\$100,000.00	\$52,762.98
Blue Diamond (FBO CN IRA)	20684	\$269,534.28	\$142,214.32
RWL	307	\$9,399.97	\$4,959.70
PRG2FAT	20611	\$18,000.03	\$9,497.35
MP	407	\$25,440.04	\$13,422.92
BKRT dtd 11/22/89	20007	\$46,500.00	\$24,534.79
BS	20462	\$46,666.70	\$24,622.74
JES	487	\$56,800.00	\$29,969.37
JMM	108	\$65,000.00	\$34,295.94
HMK	109	\$65,000.00	\$34,295.94
DEZ	265	\$65,000.00	\$34,295.94
PK	508	\$75,000.00	\$39,572.24
CCR	20472	\$93,063.24	\$49,102.94

Creditor	Claim #	Allowed	First Distr.
SPL	246	\$130,000.00	\$68,591.87
CAK	20305	\$158,522.01	\$83,640.94
RH	20304	\$180,417.05	\$95,193.41
SB	535	\$189,120.86	\$99,785.80
KBI	20006	\$278,100.00	\$146,733.85
PKS	20405	\$304,366.63	\$160,592.91
MRS	20631	\$402,336.67	\$212,284.82
LN	286	\$7,771.42	\$4,100.43
GLS	256	\$9,199.96	\$4,854.17
EBH	517	\$9,399.98	\$4,959.71
AMS	450	\$10,969.18	\$5,787.67
LN	285	\$16,924.00	\$8,929.61
RJL	50	\$18,390.64	\$9,703.45
DH	301	\$18,466.59	\$9,743.52
ALG	211	\$18,800.03	\$9,919.46
SWHJ	536	\$19,200.02	\$10,130.50
PSST	12	\$22,287.50	\$11,759.55
SKM	515	\$23,166.63	\$12,223.40
MC	274	\$23,833.31	\$12,575.16
EJNRI	20636	\$23,875.00	\$12,597.16
DVMIT	91	\$23,999.99	\$12,663.11
RBNT	148	\$27,400.00	\$14,457.06
P&PL	85	\$28,000.00	\$14,773.63
LV	20123	\$28,000.00	\$14,773.63
EJNI	20639	\$37,240.29	\$19,649.09
CFT	78	\$37,866.66	\$19,979.58
NPW (Roth IRA)	207	\$38,898.86	\$20,524.20
BJC	67	\$41,566.65	\$21,931.80
LJDS	227	\$44,666.24	\$23,567.24
RRC	262	\$44,999.57	\$23,743.11
GLJ	194	\$46,678.21	\$24,628.81
MEB	174	\$46,833.33	\$24,710.66
RN	198	\$47,000.00	\$24,798.60
MJ&KAD	86	\$47,999.98	\$25,326.22
GAF	437	\$49,333.34	\$26,029.74
GAF	438	\$49,333.34	\$26,029.74
AMP	510	\$50,000.00	\$26,381.49
WaJC	20332	\$50,000.00	\$26,381.49
OPF	329	\$56,717.42	\$29,925.80
PAM	20308	\$66,974.32	\$35,337.65
EAT	20652	\$71,000.00	\$37,461.72
TP	509	\$75,000.00	\$39,572.24
NKB	173	\$91,624.99	\$48,344.08

Creditor	Claim #	Allowed	First Distr.
SB	384	\$94,666.65	\$49,948.95
SAS	191	\$94,750.00	\$49,992.92
GJC	486	\$96,943.62	\$51,150.34
MG	361	\$97,250.00	\$51,312.00
WM	20650	\$100,000.00	\$52,762.98
Nuview Trust Company, Inc. FBO RS	189	\$112,320.00	\$59,263.38
VJ&JAP	493	\$115,855.92	\$61,129.04
RS	20643	\$136,916.70	\$72,241.33
WP	298	\$143,000.01	\$75,451.07
EJN	20637	\$164,518.04	\$86,804.62
AP	99	\$175,333.33	\$92,511.09
WP	424	\$185,000.00	\$97,611.51
CJF	491	\$187,215.00	\$98,780.21
MA	100	\$232,501.00	\$122,674.46
CA	98	\$197,025.00	\$103,956.26
EAT	20653	\$198,500.00	\$104,734.52
B&DO	305	\$220,000.00	\$116,078.56
NPW (IRA)	206	\$240,956.00	\$127,135.57
GAS	288	\$249,537.50	\$131,663.42
MDW	205	\$250,000.00	\$131,907.45
WHS	20358	\$279,499.99	\$147,472.53
RG	358	\$352,706.20	\$186,098.30
GC	209	\$373,234.51	\$196,929.65
JZ	20350	\$819,112.13	\$432,187.97
RS	20000	\$46,666.70	\$24,622.74
WKS	233	\$224,200.00	\$118,294.60
DL	549	\$45,336.34	\$23,920.80
RT	550	\$18,866.66	\$9,954.61
LS	551	\$169,158.17	\$89,252.89
JL	552	\$24,733.32	\$13,050.04
AL	553	\$50,000.00	\$26,381.49
JFLT	554	\$91,000.00	\$48,014.31
GR	555	\$39,893.18	\$21,048.83
CAMAPLAN	Bulk	\$265,280.00	\$139,969.63
		\$11,623,699.23	\$6,133,010.15
		Distribution %	52.8%

INSIDER INVESTORS

	Amount to distribute:		\$0.00
JOHN GISSAS	20704	\$0.00	\$0.00
BLUE DIAMOND (JOHN GISSAS)	20692	\$0.00	\$0.00
		\$0.00	\$0.00

Exhibit “3”

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
NO. 20-CV-81205-RAR**

SECURITIES AND EXCHANGE COMMISSION

vs.

COMPLETE BUSINESS SOLUTIONS
GROUP, INC. d/b/a PAR FUNDING, *et al.*,

0000020702

03/22/2023 17:54:50

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**PROOF OF CLAIM FORM
(Instructions Attached)**

Check this box if this claim amends a previously filed claim, dated _____ (including Claim # if known)

ENTITY AGAINST WHICH YOU ARE ASSERTING A CLAIM (mark one)

Receivership Entities

- ALB Management
- Beta Abigail
- Complete Business Solutions Group d/b/a Par Funding (CBSG)
- Contract Financing Solutions
- Eagle Six Consulting
- Fast Advance Funding
- Full Spectrum Processing
- Heritage Business Consulting
- Liberty Eight Avenue
- LME 2017 Family Trust
- Recruiting and Marketing Resources (RMR)
- Abetterfinancialplan.com
- ABFP Management Company
- ABFP Income Fund
- ABFP Income Fund Parallel
- ABFP Income Fund 2
- ABFP Income Fund 3
- ABFP Income Fund 3 Parallel
- ABFP Income Fund 4
- ABFP Income Fund 4 Parallel
- ABFP Income Fund 6
- ABFP Income Fund 6 Parallel
- ABFP Multi Strategy Investment Fund
- ABFP Multi Strategy Investment Fund 2
- MK Corporate Debt Investment Company
- Fidelis Financial Planning
- United Fidelis Group
- Retirement Evolution Group
- Retirement Evolution Income Fund
- Retirement Evolution Income Fund 2

Non-Receiverhip Entities

- AGM Capital Fund
- AGM capital Fund 2

- Alvin Holdings
- Blue Stream Income Fund
- Cape Cod Income Fund
- Capricorn Income Fund
- Capricorn Income Fund I Parallel LLC
- GR8 Income Fund
- Jade Fund
- Jax Fund
- LWM Equity Fund
- LWM Income Fund 2
- LWM Income Fund Parallel
- Mariner MCA Income Fund
- MCA Capital Fund
- MCA Carolina Income Fund
- MCA National Fund
- Merchant Factoring Income Fund
- Merchant Services Income Fund Parallel
- Mid Atlantic MCA Fund
- MK One Income Fund
- Pisces Income Fund
- Pisces Income Fund Parallel
- RAZR MCA Fund
- Retirement Evolution Insured Income Fund
- Sherpa Income Fund 1
- Spartan Income Fund
- Spartan Income Fund Parallel
- STFG Income Fund
- Victory Income Fund
- Wellen Fund 1
- WorkWell Fund

OTHER (provide entity/individual name below)

John Gissas

1. NAME AND ADDRESS OF CLAIMANT

Name John Gissas
Street Address 3990 E State Road 44, Suite 202
City / State / Zip Code/ Country Wildwood FL 34785

If Claimant is an entity, name of contact person for Claimant and title: _____

Telephone No. of Claimant: **REDACTED**

Email address of Claimant: john@REDACTED

Last four digits of Tax I.D. No. or SSN: **REDACTED** Account or Reference No: _____ (if known)

2. CLAIM

2a. Basis of Pre-Receivership Claim:

- Good sold or services performed
- Money loaned or invested or owner, partner, member, equity or other investment interest
- Taxes
- Wages, salaries, benefits or compensation (fill out below and attach a detailed explanation) or unpaid compensation and benefits for services performed from _____ to _____ (dates).
Title: _____
- Uncashed check issued prior to July 18, 2020
- Other (attach a detailed explanation)

2b. Pre-Receivership Claim Amount: \$ 0

2c. Administrative (Post-Receivership) Claim:

- Check this box if your claim is an Administrative Claim. Briefly state the post Receivership basis of your Administrative Claim:

John Gissas' reputation has been damaged both professionally and personally as a result of Par Funding.

2d: Administrative Claim Amount: \$ \$8,000,000.00

2e. Identify any other party who you claim may be liable to you for repayment of your claim:

2f. Legal action or claim against Receivership Entity (provide caption, date commenced, Court, Case No.):

Amount recovered from other parties: \$ _____
If court judgment, date obtained: _____

- 2g: Check this box if the claim includes interest or other Charges, such as attorney's fees, lost profits or late fees in Addition to the principal amount of the claim. Attach an Itemized statement of all interest and other charges.

3. Supporting Documents: Please Review the Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim, which was included with this Proof of Claim Form, for instructions of supporting documents to attach to your Proof of Claim Form (including for example, documents evidencing the amount and basis of your Claim). DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain why. If the documents are voluminous, attach a summary.

4. Signature: Sign and print the name and title, if any, of the individual or person authorized to submit this claim (attach a copy of any power of attorney, death certificate or other authorizing documents as needed).

By signing your name below, you are certifying that the information contained in this Proof of Claim Form and any attached documentation is true and correct under penalty of perjury under the laws of the United States of America.

Signature: John Gissas Name: John Gissas Title (if any) _____

5. Dated: 03/22/2023 17:54:50

YOU MUST DATE AND SIGN THIS FORM FOR THIS CLAIM TO BE VALID

INFORMATION ON COMPLETING THE PROOF OF CLAIM FORM

- 1. Information about Claimant.** Complete this section giving the name, address, telephone number and email address of the individual or entity who is asserting a claim against a Par Funding Receivership Entity and the Receivership Estate, and any account or reference number associated with such debt or obligation. If the Claimant is an entity, please provide contact information and the title of the authorized representative. If a valid email address is included on this form, the Claims Agent will send email notification confirming receipt of the Proof of Claim.
- 2. Claim information.**
 - 2a.** Please indicate the basis of your claim in this section. If you believe you have one claim, you only need to submit one Proof of Claim Form. If you believe you have multiple claims, you should file a separate Proof of Claim Form for each such claim. Check only one box per claim. Attach additional explanations as necessary. Please refer to The Notice of Claims Bar Date and Procedures For Submitting a Proof of Claim for the definitions of a Claimant, Pre- Receivership Creditor Claim, Par Funding-Related Claim, Par Funding Receivership Entities, and any other capitalized terms not defined therein can be found in the documents available at: the Receiver's website (www.ParFundingReceivership.com). If you are a Claimant that pooled funds from individual investors for investment in CBSG (*i.e.*, an "Agent Fund"), you must fill out and attach an "Agent Fund Supplement to Proof of Claim Form (see Exhibit B), along with the other information described in Exhibit B.
 - 2b. Pre- Receivership Claim Amount.** For all Claims other than Administrative Claims, please state the amount of your claim as of July 28, 2020. Investors, if you claim to have made a loan to, obtained a promissory note from, or hold an interest in a Receivership Entity, please fill out and attach an "Investor Supplement to Proof of Claim Form" (see Exhibit A) to account for each time you made an investment with or provided funds to the applicable Receivership Entity and the date and amount of each transaction thereafter. You must also provide a chronological accounting indicating the date and amount of any withdrawals made by or payments received by you from any Receivership Entity, whether such payments were denominated as the return of principal, interest, commissions, finder's fee, or otherwise.

You can also obtain the Investor Supplement to Proof of Claim Form and instructions from a link on the Receiver's website (www.ParFundingReceivership.com).
 - 2c. Administrative Claim.** Mark the applicable box if your claim is an Administrative Claim. Please refer to The Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim for the definition of an Administrative Claim, Administrative Claimant, must also designate the post- Receivership basis for the claim. Attach additional explanations as necessary.
 - 2d. Administrative Claim Amount.** Administrative Claimants must state the unpaid amount of the post- Receivership Claim.
 - 2e. Other liable parties.** Please identify all other parties you believe may be liable to you on the claim. Also, please provide any information regarding money recovered from such party(ies).
 - 2f. Pending legal action.** If you have commenced a legal action against any party you believe may be liable to you on the claim, please provide the details of said legal action here, including the Court and Case number. Please attach supporting documentation. Also, please provide any information regarding court judgments and money recovered.
 - 2g. Claim above principal amount.** Mark the applicable box if your claim amount includes interest or other charges, such as attorneys' fees, lost profits, or late fees in addition to the principal amount of your claim and attach an itemized statement of all such additional charges.
- 3. Supporting Documentation.** In addition to filling out the Proof of Claim Form, you must provide supporting documentation evidencing your claim. **Please Review the Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim** for instructions of the supporting documents which must be attached to your Proof of Claim Form, as applicable.
DO NOT SEND ORIGINAL DOCUMENTS.
If the documents are not available, explain why. If the documents are voluminous, attach a summary.
- 4. Signature is required.** Sign the Proof of Claim Form and indicate your name and title, as applicable.
- 5. Date.** Insert the date on which you completed and signed the Proof of Claim Form.
- 6. Submit Claim Form.** Submit a completed Proof of Claim Form, along with all supporting documentation:
By electronic submission on the claims portal, which is available on the Receiver's website (www.parfundingreceivership.com);
By mail to Par Funding Receivership Claims Processing Center, c/o Epiq Corporate Restructuring, LLC, P.O. Box 4421, Beaverton, OR 97076-4421; or
By courier service addressed to Par Funding Receivership Claims Processing Center, c/o Epiq Corporate Restructuring, LLC, 10300 SW Allen Blvd., Beaverton, OR 97005.

If you submit a Proof of Claim by courier service, you should retain evidence the Proof of Claim was delivered to the Claims Agent no later than the Claims Bar Date. If you submit a Proof of Claim by mail, it is recommended that you submit your Proof of Claim by certified or registered mail and retain evidence that the Proof of Claim was postmarked no later than the Claims Bar Date.
- 7. Acknowledgment of Receipt of Proof of Claim Form.** Proof of Claim Forms submitted with a valid email address will receive email notification confirming receipt by the Claims Agent of the Proof of Claim.

As a victim of Par Funding (CBSG) as most others involved, I had performed my due diligence and invested a substantial amount of my personal assets. In their efforts to rectify this PAR situation, the SEC cast a wide net and in doing so the SEC erroneously leveraged its enforcement authority on me.

The following are the results of the SEC's unwarranted penalization of my efforts to seek out the best possible investments for my clients as well as myself.

1. The SEC never returned the computer and IPAD that were confiscated back in July 2020. I was assured those items were sent back on multiple occasions, yet I have never received them.
2. Myself and my companys have suffered tremendous losses as a victim of this PAR ordeal.
3. We performed a review of the company, its investments, the financial statements provided to us, and their physical location. Accordingly, there were no red flags.
4. Because of the PAR investigation and seizure, our company was and still is irreparable harmed.
5. Seeking to capitalize on this already assault various individuals published multiple articles in the Paper and on lie thus damaging and penalizing my company even further.
6. Other financial companies in the Villages have capitalized on these mischaracterizations of our actions and business practices.
7. The Villages is a unique retirement community. As such a story like this even if unsubstantiated has hurt the company and all its investors.
8. This baseless attack against our company that has victimized the security of innocent client investments including my own.
9. Because of the unique community that comprises the Villages, unsubstantiated accusations make it very costly and nearly impossible to get rid of the bad reputation that has come from the SEC's actions and has been extremely detrimental to the company's once proud reputation.
- 10.I have invested my own money thus making the supposed conspirator a victim of this scheme as well.
- 11.In addition to the previously mentioned penalties, my family has even been threatened at home with the likelihood of a firearm related incident.

The company and most important, all the investors, including myself have unnecessarily lost a tremendous amount of our assets.

In light of the substantiated information above, I John Gissas will seek to enter a claim for damages for both me and my victimized clients of \$8,000,000 for overall damages.

Exhibit “4”

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT
IN AND FOR SUMTER COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.: 2023-CF-1218

Plaintiff,

OSP CASE NO.: 2022-0164-ORL

v.

JOHN GISSAS,

Defendant.

AMENDED
INFORMATION:

COUNT 1:

ORGANIZED FRAUD

(AGGREGATE VALUE OF THE PROPERTY OBTAINED WAS GREATER THAN \$50,000)

817.034(4)(a)(1)

F1 – Level 7

COUNT 2:

SECURITIES FRAUD

517.301 & 517.302(2) & 517.312

F1 – Level 7

COUNT 3:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 4:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 5:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 6:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 7:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 8:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 9:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 10:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 11:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 12:

SALE OF SECURITY BY UNREGISTRED DEALER .

517.12 & 517.302(1)

F3 – Level 4

COUNT 13:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 14:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 15:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 16:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 17:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 18:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 19:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 20:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 21:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 22:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 23:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 24:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 25:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 26:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 27:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 28:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 29:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 30:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 31:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 32:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 33:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 34:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 35:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 36:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 37:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 38:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 39:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 40:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 41:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 42:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 43:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 44:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 45:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 46:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 47:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 48:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 49:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 50:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 51:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 52:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 53:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 54:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 55:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 56:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

COUNT 57:

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

517.07

F3 – Level 4

COUNT 58:

SALE OF SECURITY BY UNREGISTRED DEALER

517.12 & 517.302(1)

F3 – Level 4

UNOFFICIAL
DOCUMENT

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA

COUNT 1
ORGANIZED FRAUD

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, **CHARGES** that beginning on or about July 1, 2018 and continuing through and including on or about July 31, 2020, in the Fifth, Eleventh, and Thirteenth Judicial Circuits of Florida, to-wit: Sumter, Miami-Dade and Hillsborough Counties, **JOHN GISSAS** did engage in a scheme to defraud, to-wit: a systematic, ongoing course of conduct, with the intent to defraud one or more persons or corporations, to-wit: Arthur Gage, and/or Barbara Stirpe, and/or Gerald Calegan, and/or Carol Fardette, and/or, Carolyn Randle, and/or Michael Long, and/or Cheryl Gifford, and/or Stephen Salanco, and/or Gary Ross, and/or Harvey Bernstein, and/or Jane Bernstein, and/or Suzanne Bernstein, and/or Larry Cohen, and/or Linda Shipic, and/or Robin Schang, and/or Lloyd Rohlig, and/or Louis Dibilio, and/or Francis Dibilio, and/or Martin Domagala, and/or Meldoy West, and/or Neil West, and/or Michael Cipolla, and/or Michael Waldron, and/or Norbert Bashaw, and/or Patricia Staub, and/or Barbara Kuker, and/or Philip Beitel, and/or Robert Stoller, and/or Ronald Inverso, and/or Connie Inverso, and/or Ronald Lipowski, and/or Scott Bailey, and/or Wayne Lender, and/or Wendy Smickel, and/or William Palmubo, and/or Sharon Manz, and/or others, with the intent to obtain property, to-wit: U.S Currency, from one or more of these same persons or corporations by false or fraudulent pretenses, representations or promises, or willful misrepresentations of a future act, and in so doing did obtain property, to-wit: U.S Currency and/or monetary instruments, with an aggregate value of FIFTY THOUSAND DOLLARS (\$50,000) or more, in violation of Sections 817.034(4)(a)(1) and 777.011, Florida Statutes.

COUNT 2
SECURITIES FRAUD

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2018 and continuing through and including on or about July 31, 2020, in the Fifth, Eleventh, and Thirteenth Judicial Circuits of Florida, to-wit: Sumter, Miami-Dade, and Hillsborough Counties, **JOHN GISSAS**, in connection with the offer, sale, or purchase of any investment or security, did obtain money or property from Arthur Gage, and/or Barbara Stirpe, and/or Gerald Calegan, and/or Carol Fardette, and/or, Carolyn Randle, and/or Michael Long, and/or Cheryl Gifford, and/or Stephen Salanco, and/or Gary Ross, and/or Harvey Bernstein, and/or Jane Bernstein, and/or Suzanne Bernstein, and/or Larry Cohen, and/or Linda Shipic, and/or Robin Schang, and/or Lloyd Rohlig, and/or Louis Dibilio, and/or Francis Dibilio, and/or Martin Domagala, and/or Meldoy West, and/or Neil West, and/or Michael Cipolla, and/or Michael Waldron, and/or Norbert Bashaw, and/or Patricia Staub, and/or Barbara Kuker, and/or Philip Beitel, and/or Robert Stoller, and/or Ronald Inverso, and/or Connie Inverso, and/or Ronald Lipowski, and/or Scott Bailey, and/or Wayne Lender, and/or Wendy Smiekel, and/or William Palmubo, and/or Sharon Manz, and/or others, by means of any untrue statement of a material fact, or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or did employ a scheme to defraud and in the course thereof did obtain money or property of an aggregate value exceeding \$50,000 from five or more persons, in violation of Sections 517.301, 517.302(2), and 517.312 Florida Statutes.

COUNT 3
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 30, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **ARTHUR GAGE**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 4
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 30, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **ARTHUR GAGE**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 5
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 15, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **PETER STIRPE** and/or **BARBARA STIRPE**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 6
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 15, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **PETER STIRPE** and/or **BARBARA STIRPE**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 7

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about January 1, 2019 and continuing through and including on or about May 17, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **GERALD CALEGAN** and/or **CAROL FARDETTE**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 8

SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about January 1, 2019 and continuing through and including on or about May 17, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **GERALD CALEGAN** and/or **CAROL FARDETTE**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 9

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about November 4, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **MICHAEL LONG** and/or **CAROLYN RANDLE**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 10
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about November 4, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **MICHAEL LONG** and/or **CAROLYN RANDLE**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 11
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about November 20, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **STEPHEN SALANCO** and/or **CHERYL GIFFORD**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 12
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about November 20, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **STEPHEN SALANCO** and/or **CHERYL GIFFORD**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 13

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 15, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **GARY ROSS**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 14

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 15, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **GARY ROSS**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 15

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about April 25, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **HARVEY BERNSTEIN**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 16
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about April 25, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **HARVEY BERNSTEIN**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 17
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about May 10, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **JANE BERNSTEIN**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 18
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about May 25, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **JANE BERNSTEIN**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 19

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about September 26, 2019, in the Fifth and Eleventh Judicial Circuits of Florida, to-wit: Sumter and Miami-Dade Counties, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **SUZANNE BERNSTEIN**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 20

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about September 26, 2019, in the Fifth and Eleventh Judicial Circuits of Florida, to-wit: Sumter and Miami-Dade Counties, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **SUZANNE BERNSTEIN**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 21

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2018 and continuing through and including on or about July 6, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **LARRY COHEN**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 22
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2019 and continuing through and including on or about July 6, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **LARRY COHEN**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 23
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about November 6, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **LINDA SHIPIC**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 24
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about November 6, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **LINDA SHIPIC**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 25

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2019 and continuing through and including on or about January 17, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **ROBIN SCHANG**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 26

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2019 and continuing through and including on or about January 17, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **ROBIN SCHANG**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 27

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about April 10, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **LOUIS DIBILIO and/or FRANCIS DIBILIO**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 28
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about April 10, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **LOUIS DIBILIO and/or FRANCIS DIBILIO**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 29
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about September 1, 2019 and continuing through and including on or about December 31, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **MARTIN DOMAGALA**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 30
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about September 1, 2019 and continuing through and including on or about December 31, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **MARTIN DOMAGALA**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 31

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about June 13, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **NEIL WEST and/or MELODY WEST**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 32

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about June 13, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **NEIL WEST and/or MELODY WEST**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 33

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2019 and continuing through and including on or about February 11, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **MICHAEL CIPOLLA**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 34

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2019 and continuing through and including on or about February 11, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **MICHAEL CIPOLLA**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 35

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2019 and continuing through and including on or about February 7, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **MICHAEL WALDRON**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 36

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2019 and continuing through and including on or about February 7, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **MICHAEL WALDRON**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 37

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 7, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **NORBERT BASHAW**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 38

SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about October 7, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **NORBERT BASHAW**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 39

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about January 10, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **PATRICIA STAUB and/or BARBARA KUKER**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 40

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about April 1, 2019 and continuing through and including on or about January 10, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **PATRICIA STAUB and/or BARBARA KUKER**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 41

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about January 29, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **PHILIP BEITEL**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 42

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about January 29, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **PHILIP BEITEL**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 43

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about October 14, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **ROBERT STOLLER**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 44

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about October 4, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **ROBERT STOLLER**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 45

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about November 6, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **RONALD INVERSO and/or CONNIE INVERSO**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 46
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about November 6, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **RONALD INVERSO and/or CONNIE INVERSO**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 47
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about October 30, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **RONALD LIPOWSKI**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 48
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about October 30, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **RONALD LIPOWSKI**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 49

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about November 21, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **SCOTT BAILEY**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 50

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about November 21, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **SCOTT BAILEY**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 51

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2018 and continuing through and including on or about February 11, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **WAYNE LENDER**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 52
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2018 and continuing through and including on or about February 11, 2020, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **WAYNE LENDER**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 53
FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2018 and continuing through and including on or about January 2, 2019, in the Fifth and Thirteenth Judicial Circuits of Florida, to-wit: Sumter and Hillsborough Counties, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **WENDY SMIEKEL**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 54
SALE OF SECURITY BY UNREGISTRED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about July 1, 2018 and continuing through and including on or about January 2, 2019, in the Fifth and Thirteenth Judicial Circuits of Florida, to-wit: Sumter and Hillsborough Counties, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **WENDY SMIEKEL**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 55

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2018 and continuing through and including on or about June 1, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **WILLIAM PALUMBO**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 56

SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about December 1, 2018 and continuing through and including on or about June 1, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **WILLIAM PALUMBO**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

COUNT 57

FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES


NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about August 27, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer for sale, from an office within this state, a security to **SHARON MANZ**, while being a dealer, associated person or issuer of securities, and not being registered as required by Chapter 517, Florida Statutes, in violation of Section 517.07 and 517.302(1), Florida Statutes.

COUNT 58
SALE OF SECURITY BY UNREGISTERED DEALER

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida, by and through the undersigned Designated Assistant Statewide Prosecutor, under oath, CHARGES beginning on or about August 1, 2019 and continuing through and including on or about August 27, 2019, in the Fifth Judicial Circuit of Florida, to-wit: Sumter County, **JOHN GISSAS** did unlawfully sell or offer to sell a security to **SHARON MANZ**, said security was not registered as required by Chapter 517, Florida Statutes, in violation of Section 517.12 and 517.302(1), Florida Statutes.

AND THE ABOVE OFFENSES OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS AS PART OF A RELATED TRANSACTION OR WERE COMMITTED IN CONNECTION WITH AN ORGANIZED CRIMINAL CONSPIRACY AFFECTING TWO OR MORE JUDICIAL CIRCUITS OF THE STATE OF FLORIDA.

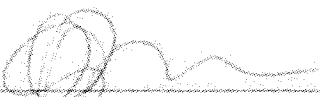
NICHOLAS B. COX
STATEWIDE PROSECUTOR
STATE OF FLORIDA

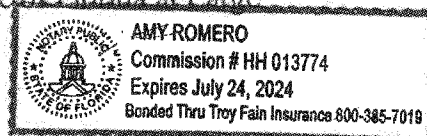

Rebecca Smith-Hameroff
Assistant Statewide Prosecutor
Florida Bar Number 105212
135 W. Central Blvd
Suite 1000
Orlando, Florida 32812
407-245-0893
Rebecca.smithhameroff@myfloridalegal.com

STATE OF FLORIDA
COUNTY OF ORANGE

Personally appeared before me, Rebecca Smith-Hameroff, Designated Assistant Statewide Prosecutor for the State of Florida, who, being first duly sworn, says that he has received testimony under oath from the material witnesses which, if true, would constitute the offenses herein charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed before me this 20th day of September, 2023, by Rebecca Smith-Hameroff, who is personally known to me.


Amy Romero
Notary Public
State of Florida at Large



BIOGRAPHICAL INFORMATION:

NAME: JOHN GISSAS

RACE: WHITE

SEX: MALE

DOB: 07/07/1950

LKA: 1406 Olustee Pl., Majorca PL, The Villages, FL 32163

UNOFFICIAL
DOCUMENT

Exhibit “5”

Warrant Service (This Agency)



SUMTER COUNTY SO
7361 POWELL RD. WILDWOOD FL 34785

2023 CF1218

Report Date / Time 9/28/2023 11:52 AM	Report Number SCSOARR110272	Case Number/Cad Number / SCSO23CAD105397	Reporting Officer Name LACEY NORDLE
Originating Agency ORI FL0600000	Occur Date Time Range 09/28/2023 11:16:11 -	Jurisdiction WITHIN JURISDICTION	
OBTS Number 6002031238	Other Number 23-3266	Clearance	

Location of Occurrence

County SUMTER	Location Type BUSINESS	Location Description MTE			
Street Number 3990	Street E SR 44	Apt/Lot/Bldg 202	City WILDWOOD	State FL	Zip Code 34785

Suspect

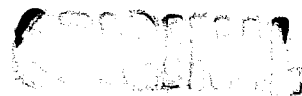
First Name JOHN	Middle Name MICHAEL	Last Name GISSAS	Suffix	Race WHITE	Sex MALE	Height 511	Weight 190	Hair GRY	Eyes BRO
MNI # SCSO20MNI005714	SSN [REDACTED]	Date of Birth 07/07/1950	Age 73	ID Type E	Drivers License or other ID [REDACTED]	State FL	OCA / Agency ID		
Place of Birth:	BRISTLE CT UNITED STATES								
Address * RESIDENCE / 1406 OLUSTEE PL , THE VILLAGES, FL 32163 / 860-302-4800									

Charge :

Counts 28	Charge 517.12.16	Bond Amount \$280000.00	<input type="checkbox"/> No Bond
Charge Degree T	Charge Level FELONY	2023 OCT -2 PM 12:49 CLERK OF CIRCUIT COURT SUMTER COUNTY, FLA JESSIE R. HAYWARD CLERK OF CIRCUIT COURT D.C.	
General Offense Code COMPLETED	Arrest Offense Code PUBLIC ORDER CRIMES		
Charge Description SECURITIES DEALER FAIL TO REGIS W SEC			
Administrative Code - Description -			

Charge :

Counts 1	Charge 517.312.1a	Bond Amount \$50000.00	<input type="checkbox"/> No Bond
Charge Degree F	Charge Level FELONY	2023 OCT -2 PM 12:49 CLERK OF CIRCUIT COURT SUMTER COUNTY, FLA JESSIE R. HAYWARD CLERK OF CIRCUIT COURT D.C.	
General Offense Code COMPLETED	Arrest Offense Code FRAUD		
Charge Description SELL SECRTY INVST 50000DOLS OR 5 OR MORE VICT			
Administrative Code - Description -			



Report Date / Time 9/28/2023 11:52 AM	Report Number SCSOARR110272	Case Number/Cad Number / SCSO23CAD105397	Reporting Officer Name LACEY NORDLE
Originating Agency ORI FL0600000	Occur Date Time Range 09/28/2023 11:16:11 -	Jurisdiction WITHIN JURISDICTION	
OBTS Number	Other Number	Clearance	

Administrative Code - Description
-

Charge :

▶ Counts 28	Charge 517.07.1	Bond Amount \$280000.00	<input type="checkbox"/> No Bond
Charge Degree T		Charge Level FELONY	
General Offense Code COMPLETED		Arrest Offense Code PUBLIC ORDER CRIMES	
Charge Description SELL UNREGISTERED NONEXEMPT SECURITY			
Administrative Code - Description -			

Charge :

▶ Counts 1	Charge 817.034.4a1	Bond Amount \$50000.00	<input type="checkbox"/> No Bond
Charge Degree F		Charge Level FELONY	
General Offense Code COMPLETED		Arrest Offense Code FRAUD-SWINDLE	
Charge Description OBTAIN PROPERTY 50K DOLS OR MORE			
Administrative Code - Description -			

Bond Set by Court

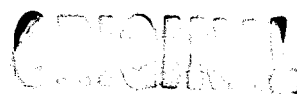
▶ Bond Amount \$660000.00	<input type="checkbox"/> No Bond
-------------------------------------	----------------------------------

Bond Type(s)
Surety

Probable Cause

CIRCUIT: SUMTER

CHARGE: CAPIAS CT I ORGANIZED FRAUD (AGGREGATE VALUE OF PROPERTY OBTAINED GREATER THAN \$50K) CT II SECURITIES FRAUD CT (ODD NUMBERS 3-57) 28 COUNTS-FAILURE OF DEALER, ASSOCIATED PERSON, OR ISSUER OF SECURITIES TO REGISTER SECURITIES CT (EVEN NUMBERS 4-58) 28 COUNTS-SALE OF SECURITY BY UNREGISTERED DEALER TOTAL COUNTS FOR ODD AND EVEN NUMBERS ARE 56 COUNTS SUBJECT HAS A TOTAL OF 58 COUNTS WARRANT #: 2023CF1218



Report Date / Time 9/28/2023 11:52 AM	Report Number SCSOARR110272	Case Number/Cad Number / SCSO23CAD105397	Reporting Officer Name LACEY NORDLE
Originating Agency ORI FL0600000	Occur Date Time Range 09/28/2023 11:16:11 -	Jurisdiction WITHIN JURISDICTION	
OBTS Number	Other Number	Clearance	

BOND: CT I \$50K CT II \$50K ODD COUNTS 3-57 \$10K EACH= \$280K EVEN COUNTS 4-58 \$10K EACH=\$280K TOTAL BOND \$660,000

Jail Booking Facility

Booking Date/Time	Booking County SUMTER	Booking Facility SUMTER COUNTY DETENTION CENTER	Booking Facility Phone (352) 569-1700
Booking Facility Location 219 EAST ANDERSON AVE. BUSHNELL, FLORIDA 33513-6149			Booking Number
Booking Comments			

Court

Court County SUMTER	Court Location 215 EAST MCCOLLUM AVENUE BUSHNELL, FLORIDA 33513		
Court SUMTER COUNTY COURT	Court Phone (352) 569-6600	Court Appearance Date / Time	Court Fine \$0.00
Comments			

Warrant Service



Service Date/Time 09/28/2023 11:59:03	Case Number 09/28/2023 11:59:03	Warrant Number SCSO23WAR001288	
Location Type BUSINESS	Location Description MTE		
Street Number 3990	Street E SR 44	Apt/Lot/Bldg 202	County SUMTER
		City WILDWOOD	State FL
			Zip Code 34785
Officer Name Rank / ID #	Involvement On Report / Reporting Role	Officer Agency Org/Unit	
LACEY NORDLE DEPUTY	60415 REPORTING OFFICER	SUMTER COUNTY SO SCSO\PATROL	

ORIGINAL

Report Date / Time 9/28/2023 11:52 AM	Report Number SCSOARR110272	Case Number/Cad Number / SCSO23CAD105397	Reporting Officer Name LACEY NORDLE
Originating Agency ORI FL0600000	Occur Date Time Range 09/28/2023 11:16:11 -		Jurisdiction WITHIN JURISDICTION
OBTS Number	Other Number	Clearance	

The undersigned certifies and swears that he/she has just and reasonable grounds to believe that the above named Defendant, committed violation(s), of law, on the below date(s) and time(s), as listed in the probable cause associated with this report:

Reporting Officer

Officer Name LACEY NORDLE	Office Rank DEPUTY	Officer ID No 60415	Sworn and subscribed before me, the undersigned authority This the <u>28th</u> day of <u>September</u> , <u>2023</u> DEPUTY OF THE COURT, NOTARY OR LAW ENFORCEMENT 
Officer Agency SUMTER COUNTY SO	Officer Signature 		

<input type="radio"/> No Bill / Petition	<input type="radio"/> Issue Warrant	<input type="radio"/> Prosecution Approved	_____ Signature of Assistant State Attorney	_____ Date
--	-------------------------------------	--	--	---------------

UNOFFICIAL
DOCUMENT



Complaint/Arrest	Court Case No.	Agency Case No.
Affidavit Continuation	2023CF1218	
Defendant Name: Last	First	Middle
GISSAS,	JOHN	MICHAEL
	Date of Birth	
	12/29/2004	

FIRST APPEARANCE FINDINGS & ORDERS

Based upon the foregoing Affidavit and/or Sworn Testimony of DEPUTY NORDLE, LACEY the undersigned finds and determines:

- As to charges(s) all (58) WAWANT that there was at the time of arrest and is probable cause to believe the defendant has committed the offense with which he/she is accused and it is hereby Ordered and Adjudged that defendant is to be detained or post bond as otherwise affixed pending further proceedings.
- As to charges(s) _____ that there is a lack of evidence that the defendant committed the offense with which he/she is accused, and it is hereby Ordered and Adjudged that the Sheriff or Chief of Police having custody is directed to forthwith release defendant from custody on defendant's own recognizance, subject to defendant appearing at all subsequent court proceedings upon proper notice.
- As to charges(s) _____ that it is hereby Ordered and Adjudged the matter of probable cause is hereby continued until the next First Appearance Hearing after date hereof, at which Hearing the Arresting Agency shall present any further proof of probable cause that it may possess.

RELEASE ORDER:

The above named Defendant was brought before the undersigned on this date at 9 AM clock, _____ M. for a first appearance hearing and the undersigned thereupon informed him/her of the charge against him/her and provided him/her with a copy thereof and also adequately advised him/her that (1) he/she was not required to say anything and that anything he/she did say might be used against him/her (2) if he/she was financially unable to afford an attorney that the Court would appoint one to represent him/her, and (3) he/she had the right to communicate with his/her attorney, his/her family, or his/her friends, and if necessary reasonable means would be provided to enable him/her to do so; and the undersigned having considered all available relevant factors necessary to determine whether bail is necessary to assure Defendant's future appearance, and found that same is _____ necessary, it is upon consideration thereof ORDERED AND ADJUDGED that the Defendant

- Be released on his/her own recognizance upon the condition that he/she appear as agreed below.
- Be admitted to bail in the amount of \$ 50K as to charge A, \$ 50K as to charge B, \$ 10K as to charge C, \$ _____ as to charge D, and \$ _____ as to charge E, upon the condition that he/she appear as agreed below.

Counts 3 - 58 10,000 BOND PER COURT
Total Bond is 660,000
NO CONTACT w/ VICTIMS or state witnesses. Do not travel outside sunter ch.
NO alcohol, No sales of securities w/ Valid License.
Electric Monitor Required

() The undersigned determines that the Defendant is solvent, is not indigent within the meaning of Rule 3.111(b)(4) FRCP and is not entitled to the services of the Office of the Public Defender.

ORDER OF INDIGENCY AND APPOINTMENT OF PUBLIC DEFENDER

ATTY FIGUEROA for Defense.

The above named Defendant appearing in Open Court, and the said Defendant having filed in this Court his Affidavit of Indigency; and testimony having been taken before this Court, and the Court being otherwise fully advised in the premises, it is thereupon:

ORDERED AND ADJUDGED as follows:

1. That the Defendant be, and he/she is hereby declared to be indigent within the meaning of Rule 3.111(b)(4) of the Florida Rules of Criminal Procedure; and
2. That the office of the Public Defender for the Fifth Judicial Circuit in and for _____ County, Florida or _____ a private counsel, is hereby appointed to represent said Defendant in the above styled cause and in any other controversy pending between the State of Florida and the said Defendant.

DONE AND ORDERED this 29 day of September '20 23, at Sunter County, Florida

Any Bond Posted must comply with order previously entered in this case regarding non-criminal origin of funds.

[Signature]
 JUDGE

DEFENDANT'S OATHS & AGREEMENTS

OATH OF INDIGENCY

The above named Defendant personally appeared before me and, being duly sworn, states:

- (1) I am the Defendant above named and desire the assistance of counsel in these proceedings.
- (2) I represent to the court, under penalty of perjury, that I am without money or means with which to employ a lawyer I have no assets which could be converted to cash, mortgaged or pledged to raise sufficient funds to employ a lawyer.
- (3) Pursuant to Section 27.56, Florida Statutes, I understand that in the event I am found guilty of a criminal act, I may be civilly liable for Court costs and a reasonable attorney's fee incurred in my defense. I further understand that I shall have the opportunity to be heard and offer objections to the determination of the value of the services of the Public Defender or appointed private counsel, and costs, at the time of the final disposition of my case.

REFUSAL OF APPOINTMENT OF COUNSEL

() I hereby represent to the County that I do not desire the services of the Office of the Public Defender and that I will employ private counsel.

AGREEMENT TO APPEAR

I hereby acknowledge receipt of a copy of the above and I agree and promise to appear in Courtroom _____ of the _____ County Courthouse, in _____ Florida, on the _____ day of _____ 20____ at _____ o'clock, _____ M, and at such other times as the Court may order, and also agree to notify the Clerk of the Court, in writing, of my new address should I move from the address below.

DATED: _____ '20
SWORN TO AND SUBSCRIBED BEFORE
ME THIS _____ DAY OF _____ '20

- refused -
Defendant

Address

Deputy Clerk/judge

Exhibit “6”

APPEARANCE BOND

SEND ALL COURT NOTICES TO:

Thomas Bonding Agency

Sean R Thomas #A263980
seanthomas.bail@gmail.com
352-317-6453
2632 NW 43rd Street #1114
Gainesville, FL. 32606
FOR FURTHER ACTION ON THIS BOND CONTACT

POWER # US 21663765
ARREST # 2023CF1218 CT1

STATE OF FLORIDA
vs

John Michael Gissas

Court Room TRN

Time _____

IN THE
Circuit
Sunters

Court
County

STATE OF FLORIDA

KNOW ALL MEN BY THESE PRESENTS: That we, the above-captioned defendant, as principals, and United States Fire Insurance Company, a Delaware Corporation, as surety, are held and firmly bound unto the Governor of the State of Florida, and his/her successors in office, the said principal, in the sum of \$ 50,000 and the said surety, for a like amount, for the payment whereof well and truly to be made, we bind ourselves, our heirs, executors, administrators and assigns firmly by these presents.

Signed and sealed this 27 day of Oct A.D. 2023

The condition of this obligation is such that if the said principal shall appear on TRN at the next regular or special term of the above court and shall submit to the said court to answer a charge of Family Swindle Obtain Property 50K Dollars or More and shall submit to orders and process of said Court and not depart the same without leave, then this obligation to be void, else to remain in full force and virtue.

TAKEN BEFORE ME AND APPROVED BY ME:

W.D. Ferrer Jr Sheriff

By [Signature] D.S.



X _____ (L.S.)

UNITED STATES FIRE INSURANCE COMPANY

[Signature] (L.S.)
(ATTORNEY-IN-FACT SURETY)

UNITED STATES FIRE INSURANCE COMPANY
11490 Westheimer Rd., Suite 300 77077
P.O. Box 2807 • Houston, Texas 77252-2807
(713) 954-8100 • (713) 954-8389 FAX

UNITED STATES FIRE INSURANCE COMPANY
11490 Westheimer Rd., Suite 300 77077
P.O. Box 2807 • Houston, Texas 77252-2807
(713) 954-8100 • (713) 954-8389 FAX

SEND TO: Sean R Thomas #A263980
seanthomas.bail@gmail.com
352-317-6453
2632 NW 43rd Street #1114
Gainesville, FL 32606

CERTIFICATE OF DISCHARGE OF BOND

Case Number _____ Bond Amount _____ Power No. _____

Defendant _____ court

This is to certify that on or about the _____ day of _____

I examined the records of _____ and found that the bond with corresponding power number has been discharged of record by reason of the following disposition _____

Person rendering decision _____

Date of Discharge _____, Witness my hand and official seal this _____

day of _____, Title _____

COURT COPY

Exhibit “7”

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT,
IN AND FOR SUMTER COUNTY, FLORIDA**

STATE OF FLORIDA,

CASE NO.: 2023-CF-001218

Plaintiff,

vs.

JOHN MICHAEL GISSAS,

Defendant.
_____ /

**ORDER ON DEFENDANT'S AMENDED STIPULATED
MOTION TO DETERMINE CONDITIONS OF PRETRIAL
DETENTION HOLD HAVE BEEN SATISFIED**

THIS CAUSE came before the Court without hearing on the Defendant's Amended Stipulated to Motion to Determine Conditions of Pretrial Detention Hold Have Been Satisfied, filed October 30, 2023. The Court having reviewed the Amended Stipulated Motion, and the Exhibits attached thereto, the court file and being otherwise fully advised in the premises, it is therefore,

ORDERED AND ADJUDGED as follows:

1. The Amended Stipulated to Motion to Determine Conditions of Pretrial Detention Hold Have Been Satisfied is hereby GRANTED.
2. The Pretrial Detention Hold has been satisfied.
3. Defendant's cash bond shall remain set in the total amount of \$660,000.00 with the following special conditions:
 - a. The Defendant shall be subject to electric monitoring at his expense. The electric monitor shall be installed by the bail bondsman prior to his release.

- b. The Defendant shall not travel outside of Sumter County, Florida.
- c. The Defendant shall have no contact with any of the alleged victims or State witnesses.
- d. The Defendant shall not use alcohol.
- e. The Defendant shall not engage in the sale of securities without a valid license.

DONE AND ORDERED in Bushnell, Sumter County, Florida, on this 3rd day of November 2023.



Mary P. Hatcher
Circuit Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Service through the Florida Courts E-Filing Portal at the email addresses listed therein, on this 3rd day of November 2023.

Rebecca Smith-Hameroff, Esq.
Assistant Statewide Prosecutor
135 W. Central Blvd, Suite 1000
Orlando, Florida 32812
Rebecca.smithhameroff@myfloridalegal.com

Caleb S. Kenyon, Esq.
Turner O'Connor Kozlowski, P.L.
102 NW 2nd Avenue
Gainesville, FL 32601
csk@toklegal.com
eservice@toklegal.com



Judicial Assistant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by FileCloud to:

SUMTER COUNTY DETENTION CENTER

DATED THIS 3RD DAY OF NOVEMBER, 2023

Sumter County, Florida

GLORIA R. HAYWARD
CLERK OF CIRCUIT COURT

By: *Katrina Berardi*
{Deputy Clerk}



UNOFFICIAL
DOCUMENT

Exhibit “8”

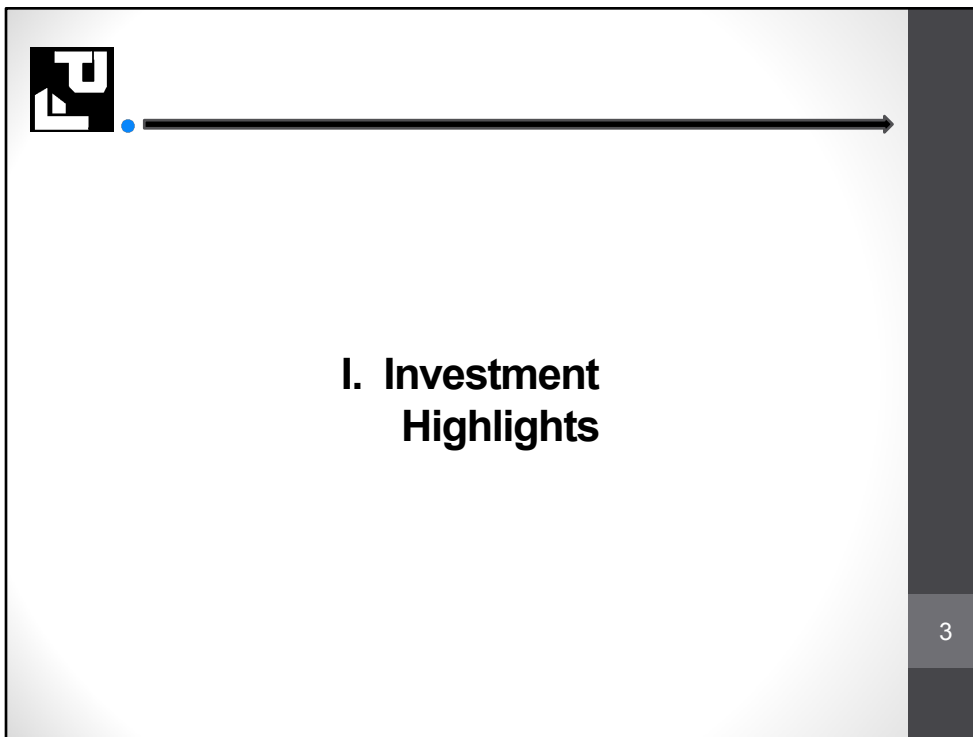


Investor Presentation



Table of Contents

- I. Investment Highlights
- II. Company Overview
- III. Industry Overview
- IV. Strategy
- V. Asset Quality
- VI. Financials & Projections



I. Investment Highlights

3



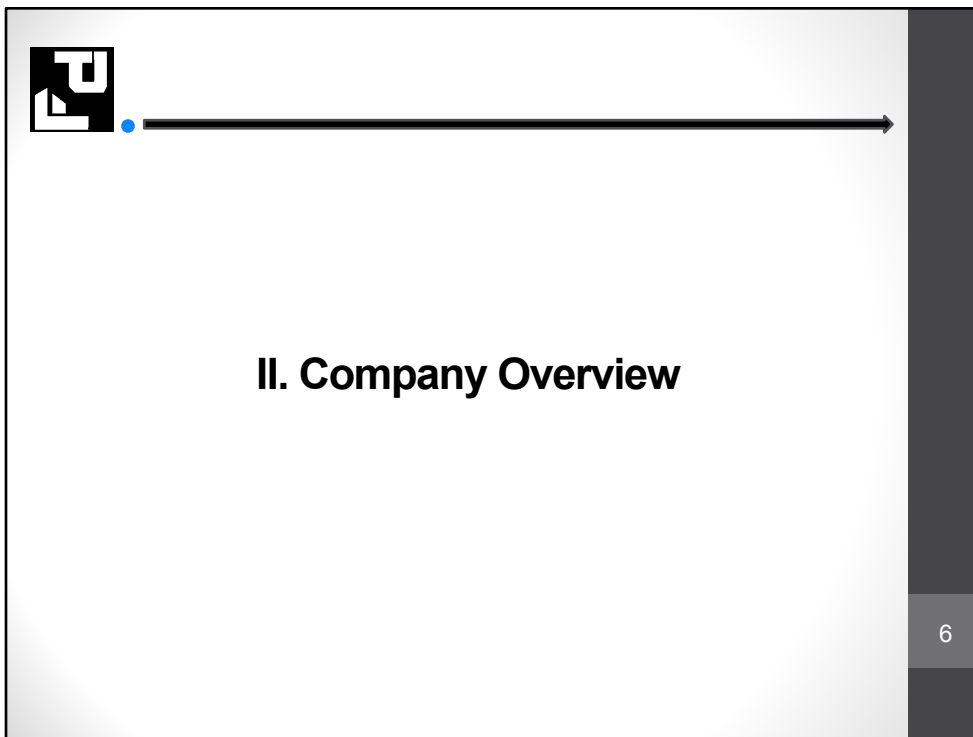
Investment Highlights

- Founded in 2011, Complete Business Solutions Group, Inc. (CBSG) is a merchant cash advance (MCA) provider that purchases future Automated Clearing House (ACH) receivables at a discount.
- Merchant Cash Advance (MCA) is a high growth industry positioned to capitalize on the ~\$300 billion untapped market for small-to-medium-size business (SMB) loans. The impact of the financial crisis and the ensuing Dodd Frank regulatory regime have orphaned many credit worthy businesses from bank lending. MCA providers fill this gap by providing quickly funded, short term advances to businesses with significantly less documentation than bank loans and with more flexible repayment terms.
- CBSG has its own sales force through a captive independent sales organization (ISO) relationship, sourcing 100% of its advances directly at a run rate of approximately \$1.5 million a month with a receivables portfolio of \$10.2 million as of June 30, 2014.



Investment Highlights Cont'd

- The Company serves a niche market currently overlooked by traditional business-to-business (B2B) lenders as management has developed innovative origination strategies that source new business based on specific industry need. The result is a pure working capital product with an average size of \$31,000, a 1.40x factor rate and a term of 3 months. The shorter tenor and relatively high factor rate versus the broader industry will allow CBSG to grow rapidly once it secures additional capital to deploy.
- CBSG outperforms on credit quality since it employs traditional underwriting techniques including on-site inspections and background checks in addition to credit scores as part of its review process. This has resulted in a default rate of 4.87% on a funded basis versus an industry average loss rate of around 8%.





Who We Are

Par Funding is a direct provider of merchant cash advances, providing cash solutions to help companies grow.

- Par Funding was founded in 2011 and is headquartered in Philadelphia, PA
- We have provided more than \$20M in working capital to businesses since inception
- Par Funding sources advances directly from its in-house broker, Fast Advance Funding, avoiding third party ISO commissions
- We service a niche market currently overlooked by traditional business to business lenders
- Our traditional approach to underwriting has resulted in credit quality that has outperformed peers



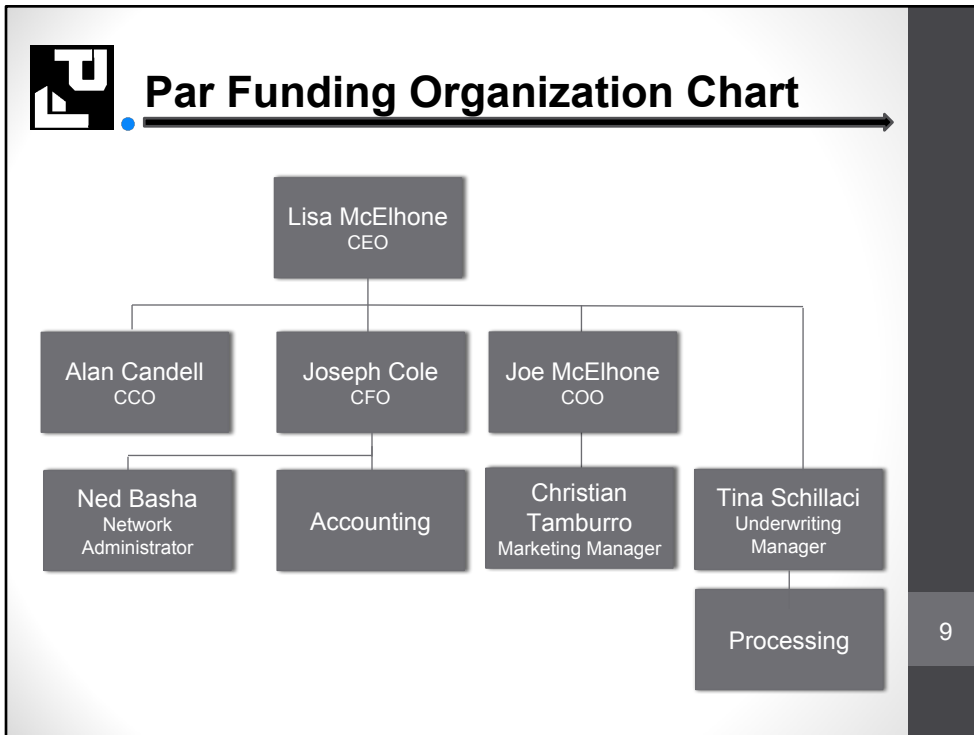
Executive Management

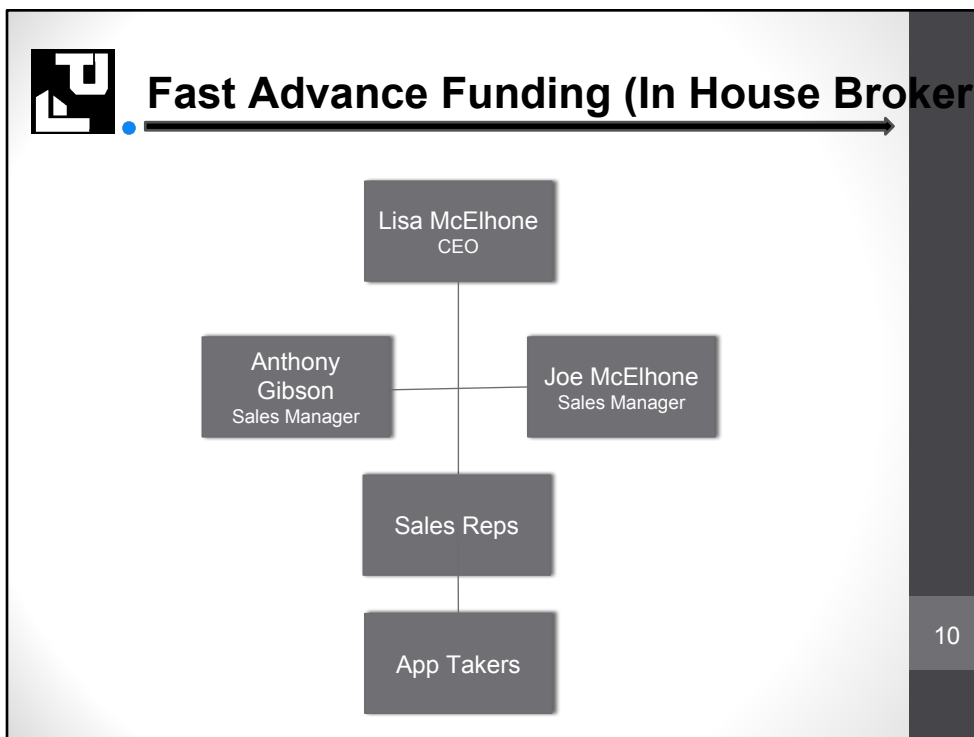
Lisa Mcelhone – Founder / CEO

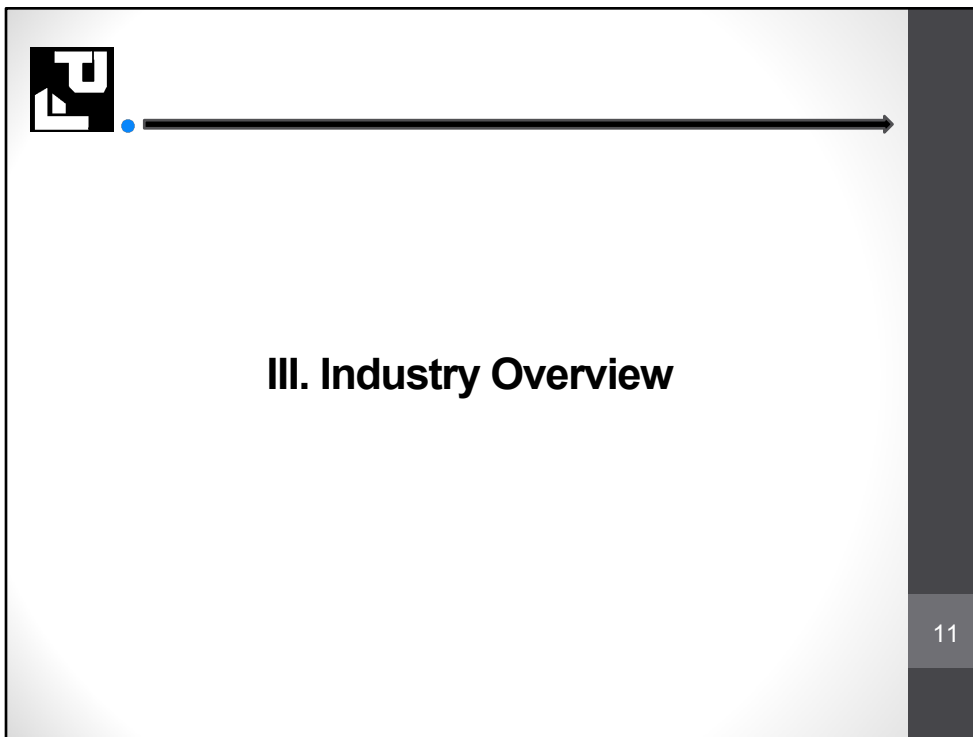
Lisa is the founder of Par Funding and started the company as an offshoot of her loan modifications company in Philadelphia. As CEO of Par Funding, she managed a productive sales team and developed rigorous underwriting guidelines which became the backbone of the company's success. Lisa also owns multiple nail salons in Philadelphia and has a degree in Management Information Systems from St. Joseph's University.

Joe Cole – CFO

After joining Par Funding in 2012, Joe Cole as CFO created the infrastructure for Par Funding's financial operations. He developed working projections and funding models to ensure company profitability. Before his time at Par Funding, Joe Cole worked as a Sales and Use tax accountant for Primoris Services Corporation in California. He has a degree in computer engineering from the University of California, Irvine.









Industry Overview

Traditional small business lending has decreased dramatically since the collapse of the U.S. banking industry in 2008.

- The number of small business loans peaked at 14 million in 2007 and declined to less than 5 million in 2010.¹
- While the TARP program sanctioned more than \$30 billion to banks to provide small business loans, however, only about \$4 billion was actually loaned.²
- Regulatory pressure has led to an increased focus on capital requirements
- A recent survey conducted by Pepperdine University revealed that 67% of those who applied for a traditional business loan were unsuccessful.

¹ Source: Federal Financial Institutions Examination Council

² Source: U.S. Small Business Administration

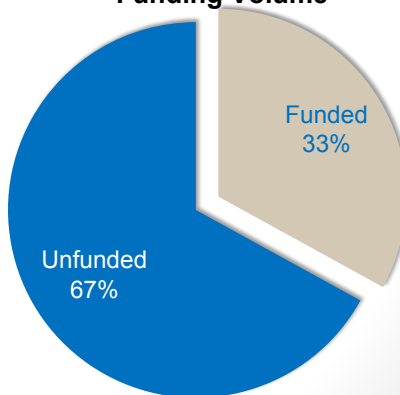


Industry Overview

Why do billions of dollars in Small Business loan applications go unfunded each year?

- Many banks have legacy portfolios of non-performing loans and higher reserve requirements making them reluctant to lend money in this category.
- Additionally, traditional lending institutions have employed stricter underwriting guidelines further limiting the amount of small business funding.

2012 Small Business Funding Volume





Industry Overview

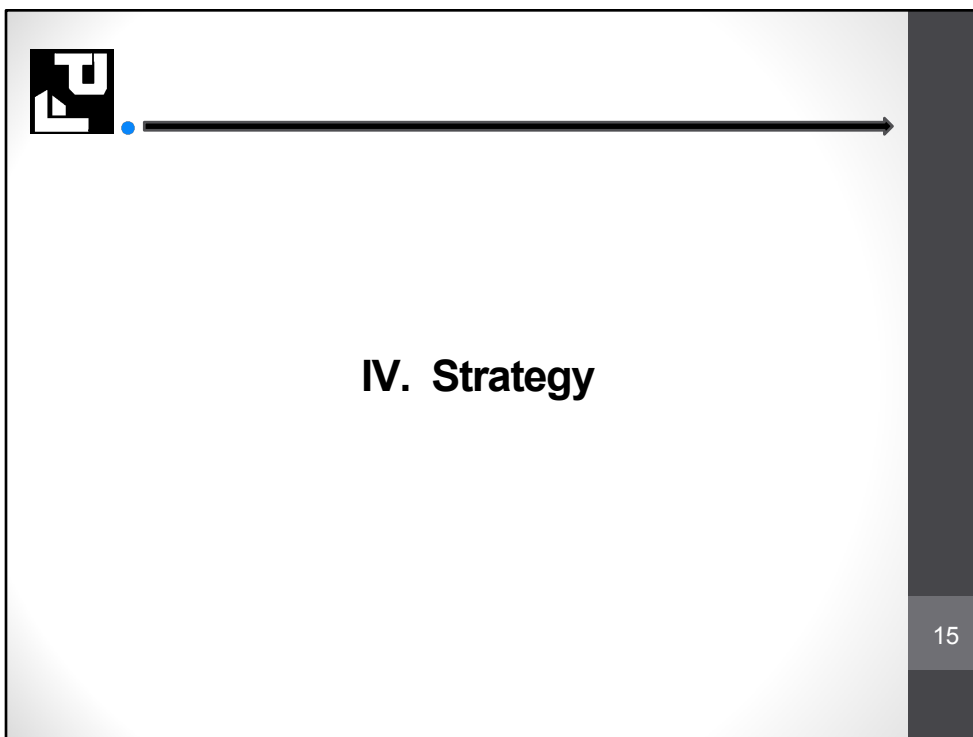
What is the alternative for many of these businesses left under serviced in a post-banking crises U.S.?

A: Merchant Cash Advance Programs



- MCA's provide a viable alternative to banks.¹
- MCA's enable businesses to leverage cash flow when needed to uplift their business.¹
- MCA payback systems based on a percentage of business receipts is a major advantage to the small business borrower.¹

¹Source: U.S. Small Business Administration





Why Par Funding?

Par Funding is uniquely positioned to capitalize in this multi-billion segment of small business funding through MCA's.

- Through our relationships with lead sourcing operations we have a large pool of higher quality businesses seeking business advances.
- Our staff manages the business relationship from underwriting through repayment to reduce non-performance to the lowest possible levels.
- Our MCA's provide high rates of return with factor rates averaging 1.40x and terms are relatively short at an average of 90 days. We have provided over \$7 million in MCA's with only \$3 million in capital investment.
- Par Funding will utilize new investor capital primarily to fund new advances and increase company revenue.
- Increased overhead expense, broker commissions and investor interest would be covered from the new business generated from additional capital.
- ~~We currently sell advances we source to affiliates that we would have otherwise funded due to a lack of capital.~~



Our Corporate Growth Snapshot

	QE 9/30/2013	QE 12/31/2013	QE 3/31/2014	QE 6/30/2014
MCA Receivables	\$5,388,910	\$6,669,269	\$6,984,143	\$8,664,591
Daily ACH	47,232	60,322	81,542	100,152
Default Reserve	(63,754)	79,593	27,956	121,061
Revenue ¹	1,834,428	1,929,266	1,863,743	2,171,622
Overhead Expense	(439,434)	(1,362,158) ²	(401,681)	(446,574)
Investor Interest	(337,769)	(316,937)	(348,686)	(346,897)
Net Income	\$1,057,225	\$250,171	\$1,113,376	\$1,378,151

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¹ Revenue includes accrued income from funding through quarter
² Overhead reflects \$674,691.95 bad debt expense



The Par Funding Advantage

Once an MCA is approved and funded it begins to generate cash flow the next day.

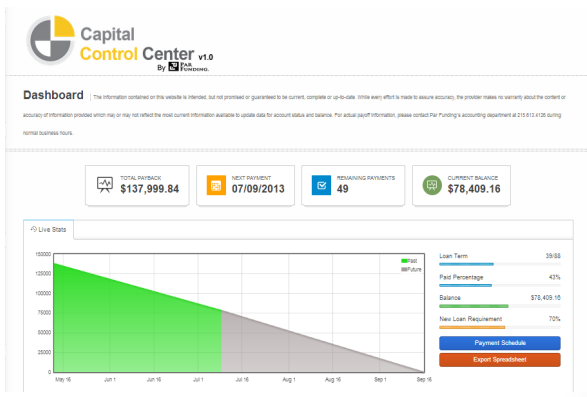
- Our MCA's range in size from \$5,000 to \$150,000 and average funding size \$31,000.
- Funding terms are typically given a for a 66 to 132 business day period or 3 to 6 months based on 22 business days per month.
- Client payments are collected via ACH debit directly from client bank accounts.
- MCA payback is based on an average factoring rate of 1.40.



Exceptional Client Service

In addition to quick funding decisions we offer additional services to help clients manage their cash.

- 24/7 customer support
- Client web portal for account management and payment tracking





Examples of Our MCA's

	Example 1	Example 2	Example 3
Funding Amount	\$20,000	\$20,000	\$20,000
Factor Rate	1.38x	1.40x	1.43x
Payback	\$27,600	\$28,000	\$28,600
Term (Days)	66	88	110
ACH Payment	\$418.18	\$318.18	\$260.00
Revenue	\$7,600	\$8,000	\$8,600



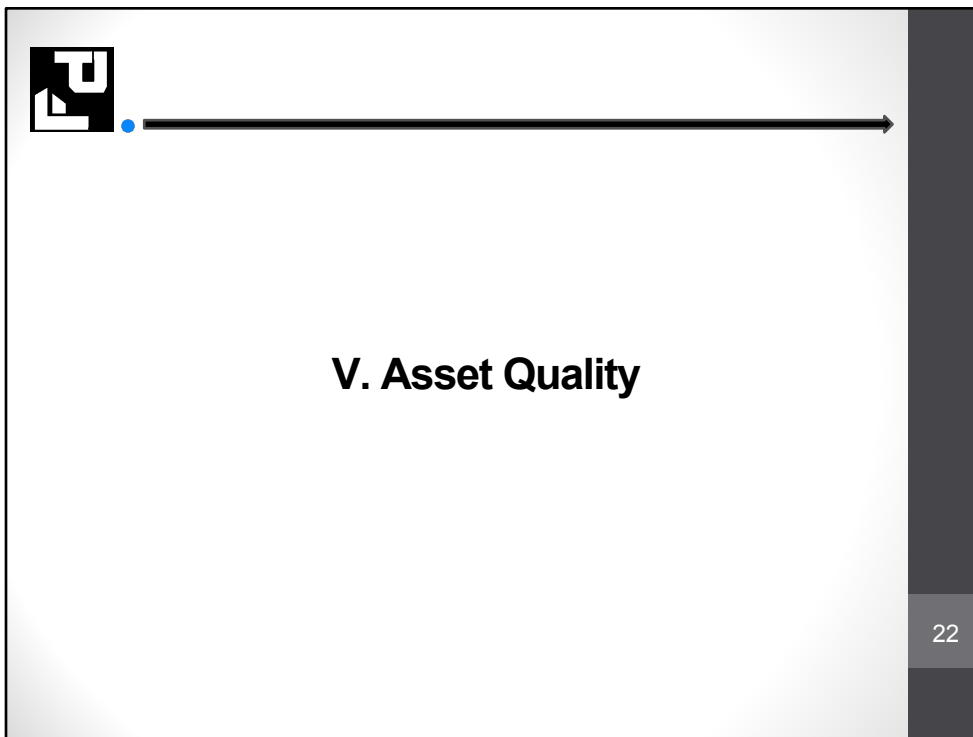
Revenue Acceleration

As our daily cash flow grows so does our rate of return.

- Daily ACH payments collected from clients are pooled together and used to fund new clients to accelerate returns.
- Compounding effect more than mitigates percentage of non-performance.

Model of Compounding Effect

	1st Funding	2nd Funding	3rd Funding
Amount	\$30,000	\$42,000	\$58,800
Payback @ 1.40x	\$42,000	\$58,800	\$82,320
Term (Days)	88	88	88
Revenue	\$12,000	\$28,800	\$52,320

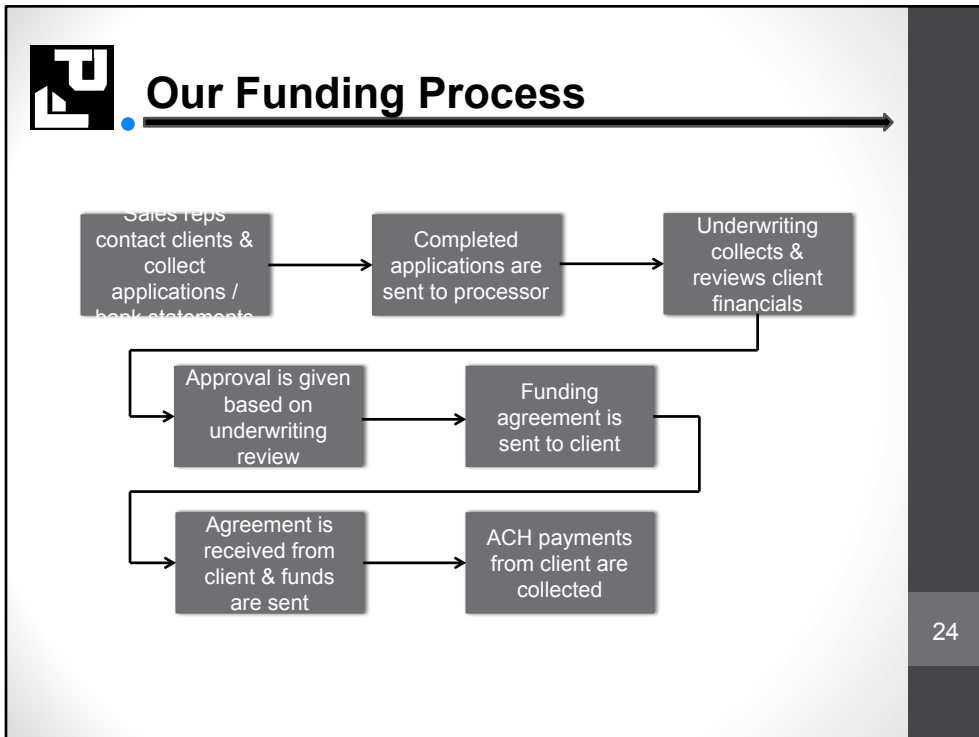


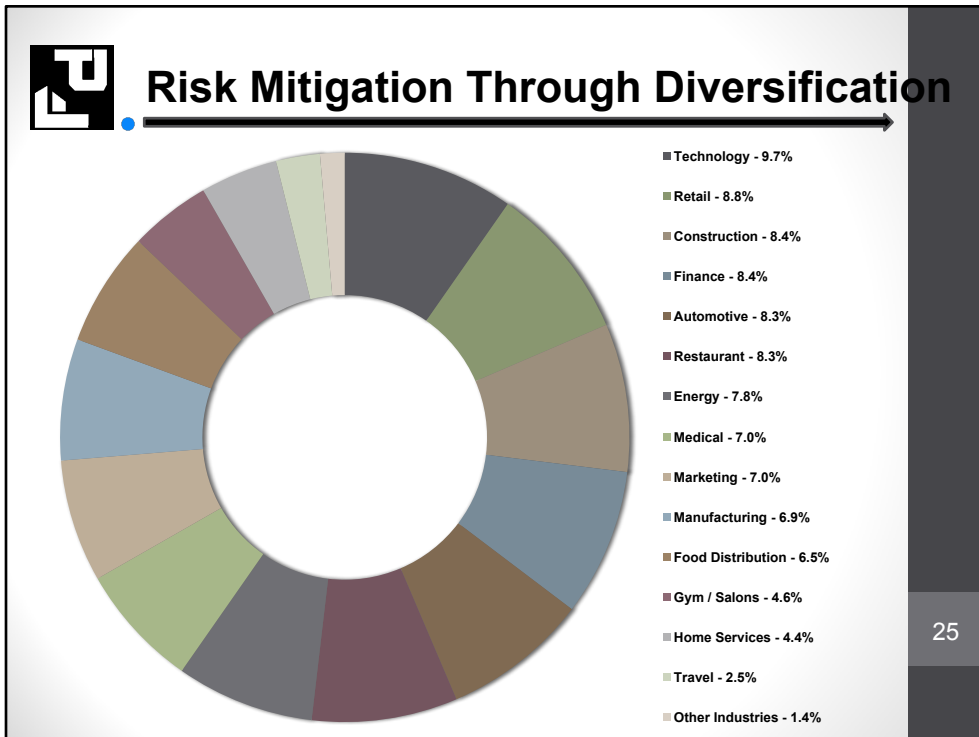


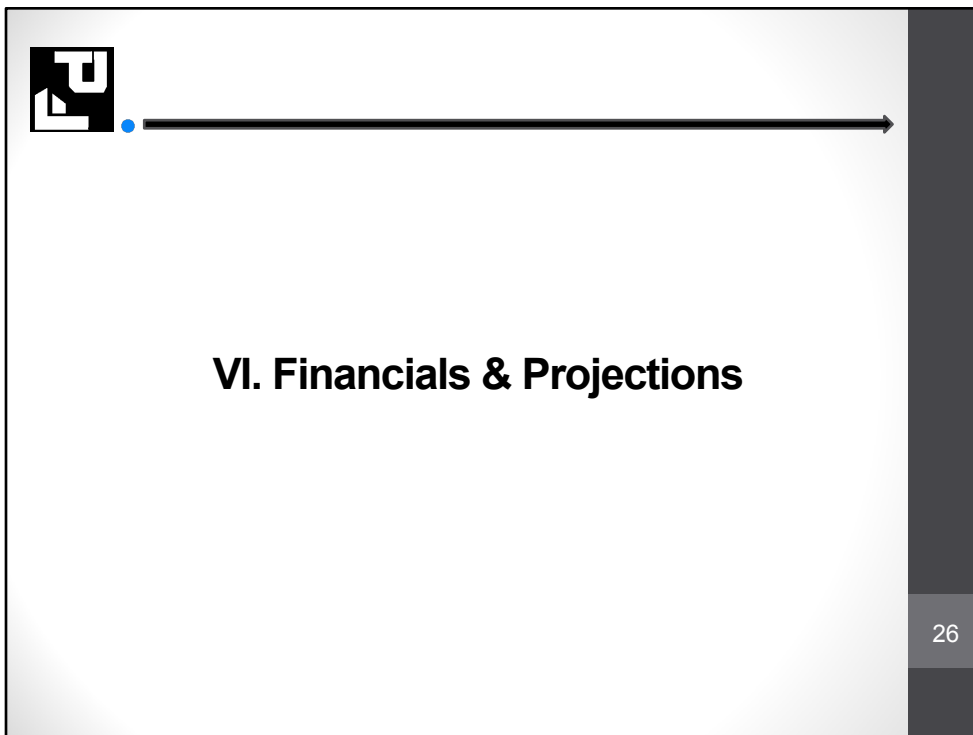
How Our Model Works

It all starts with underwriting.

- Par Funding uses a financial matrix for our underwriting which evaluates clients with an emphasis based on cash flow rather than traditional credit metrics.
- We investigate numerous sources in addition to credit scores to screen applicants including:
 - Site inspections
 - MCA Industry databases
 - Background checks
- We complete the underwriting process to reach a decision in 48 hours









Financials - Income Statements

	6M Ended 6/30/2014	Year Ended 12/31/2013	Year Ended 12/31/2012
REVENUE			
Finance Fee Income	\$3,969,284	\$5,950,346	\$289,869
Merchant Processor Commissions	28,098	1,182	-
Origination Fee Income	49,081	44,712	-
Total Revenue	\$4,046,462	\$5,996,240	\$289,869
<i>Revenue Growth Annualized</i>	35.0%	19.7x	-
EXPENSE			
Payroll, Commissions & Consulting	\$483,816	\$1,061,481	\$83,234
Other Operating Expenses	363,882	1,230,431	232,556
Operating Expenses	847,699	2,291,912	315,790
Operating Income	\$3,198,763	\$3,704,329	(\$25,922)
<i>Operating Income Margin %</i>	79.1%	61.8%	(8.9%)
Interest Expense	695,584	1,047,584	110,544
Other Income or Expense	-	-	-
Net Income	\$2,503,179	\$2,656,745	(\$136,466)
<i>Net Income Margin %</i>	61.9%	44.3%	(47.1%)
<i>Net Income Growth Annualized</i>	88.4%	-	-



Financials: Balance Sheets

	June 30, 2014	December 31, 2013	December 31, 2012
ASSETS			
Cash	\$253,144	\$248,924	\$39,347
Receivables (Advances)	10,186,136	6,968,951	1,784,657
Other Current Assets	(719,843)	(790,369)	(330,546)
Total Current Assets	9,719,437	6,427,506	1,493,458
Fixed Assets	66,428	57,851	17,080
Total Assets	\$9,785,865	\$6,485,356	\$1,510,538
LIABILITIES & EQUITY			
Accounts Payable	\$3,263	\$6,393	-
Intercompany Exchange	(299,899)	(128,775)	(43,152)
Loans Payable	5,180,861	4,094,998	1,690,155
Total Current Liabilities	4,884,225	3,972,617	1,647,003
Members Equity	2,406,001	(136,466)	-
Opening Balance Equity	(7,540)	(7,540)	-
Net Income	2,503,179	2,656,745	(136,466)
Total Equity	\$4,901,640	\$2,512,739	(\$136,466)
Total Liabilities & Equity	\$9,785,865	\$6,485,356	\$1,510,538



12 Month Projections – Stand Alone

	Q1E	Q2E	Q3E	Q4E	NTME
CASH FLOW					
ACH & Other Receipts	\$6,384,492	\$10,288,623	\$12,721,710	\$17,030,627	\$46,425,452
ACH Returns	(303,543)	(504,165)	(631,760)	(847,614)	(2,287,082)
Net ACH Receipts	6,080,948	9,784,458	12,089,951	16,183,013	44,138,370
Fundings	\$4,503,000	\$8,837,000	\$11,109,000	\$6,426,000	30,875,000
REVENUE					
Factor & Fee Income ¹	\$1,913,775	\$3,755,725	\$4,721,325	\$6,426,000	16,816,825
Other Income	-	-	-	-	-
Total Revenue	\$1,913,775	\$3,755,725	\$4,721,325	\$6,426,000	\$16,816,825
EXPENSES					
Operating Expenses	\$288,436	\$270,409	\$283,930	\$288,436	\$1,131,211
Operating Income	1,625,339	3,485,316	4,437,395	6,137,564	15,685,614
Interest Expense ²	410,937	417,345	403,845	407,428	1,639,555
Other Income or Expense	-	-	-	-	-
Pre-Tax Income	\$1,214,402	\$3,067,971	\$4,033,550	\$5,730,135	\$14,046,059
BALANCE SHEET					
Receivables (Advances)	\$9,678,768	\$12,266,110	\$15,728,760	\$20,713,746	\$20,713,746
Investor Liability	4,318,852	4,006,722	3,713,592	3,346,462	3,346,462
Equity	6,294,690	9,289,937	13,241,076	18,791,998	18,791,998


Note:
 1. Recognized on an originated basis as funded
 2. Includes accrued interest



12 Month Projections – \$20MM Facility

	Q1	Q2	Q3	Q4	NTM
CASH FLOW					
ACH & Other Receipts	\$10,097,758	\$25,459,930	\$41,140,142	\$52,296,188	\$128,994,018
ACH Returns	(632,586)	(2,168,803)	(3,925,394)	(5,229,619)	(11,956,402)
Net ACH Receipts	9,465,172	23,291,127	37,214,748	47,066,569	117,037,616
Fundings	\$13,971,000	\$26,589,000	\$36,504,000	\$42,756,000	\$119,820,000
REVENUE					
Factor & Fee Income ¹	\$5,867,820	\$11,167,380	\$15,331,680	\$17,957,520	\$50,324,400
Other Income	-	-	-	-	-
Total Revenue	\$5,867,820	\$11,167,380	\$15,331,680	\$17,957,520	\$50,324,400
EXPENSES					
Operating Expenses	\$1,267,690	\$2,214,640	\$3,011,300	\$3,560,280	\$10,053,910
Operating Income	4,600,130	8,952,740	12,320,380	14,397,240	40,270,490
Interest Expense	225,000	487,500	700,000	750,000	2,162,500
Other Income or Expense	-	-	-	-	-
Pre-Tax Income	\$4,375,130	\$8,465,240	\$11,620,380	\$13,647,240	\$38,107,990
BALANCE SHEET					
Receivables (Advances)	\$19,581,378	\$33,514,851	\$47,405,703	\$60,197,534	\$60,197,534
Investor Liability	11,000,000	17,000,000	20,000,000	20,000,000	20,000,000
Equity	8,523,161	16,345,837	27,084,577	39,698,244	39,698,244

Note:
1. Recognized on an originated basis as funded



For more information, please visit
www.parfunding.com

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Exhibit “9”

From: Joe Cole <joecole@parfunding.com>

Sent: Monday, August 17, 2015 1:52 PM EDT

To: joemack888 [REDACTED]

Subject: Bill Bromley Call

I just spoke briefly with Bill regarding the items that his prospective investors are looking for.

Essentially they want a copy of the financials and a sample file reflecting the underwriting, ACH agreement and payment history for a client.

They have an NDA signed with us and I would not be against sending that information, it really comes down to which client you would want to show them.

He also mentioned some kind of default insurance being used exclusively or in combination with an ACH reserve with the new entity, but he said we'd hash that out as we made progress with our discussion with these guys.

Please confirm if we ought to start putting together a package for them and which client we should do it for.

Joe Cole



141 N 2nd St

Philadelphia, PA 19106

Office 1: 215.613.4126

Office 2: 215.922.2636 x106

Cell: [REDACTED]

Exhibit “10”

From: Joe Cole <joe@parfunding.com>
Sent: Tuesday, December 01, 2015 9:35 AM EST
To: Bill <REDACTED>
Subject: RE: CS2000 operating agreement
Attachment(s): "CS 2000 CBSG Operating Agreement.pdf"

Bill,

Please see the attached fully executed agreement.

Joe Cole

-----Original Message-----

From: Bill <REDACTED>
Sent: Tuesday, December 1, 2015 9:31 AM
To: Joe Cole <joe@parfunding.com>
Subject: CS2000 operating agreement

Joe when you get a minute please send the executed copy to me. I am on my way in.

Bill

William Bromley
610-REDACTED
REDACTED@gmail.com=

MCA RECEIVABLES OPERATING AGREEMENT

THIS MCA Receivables Operating Agreement is entered into on November, 16 2015 by Capital Source 2000, Inc., a Delaware business corporation (herein after referred to in the alternatives as “CS 2000” or “Company”) and Complete Business Solutions Group, Inc., a Delaware business corporation (herein after referred to in the alternatives as “CBSG” or the “Manager”).

RECITALS

Company desires to utilize Manager’s expertise and business infrastructure in creating and managing portfolio(s) of Merchant Cash Advance “MCA” receivables purchased from business entities. The Manager will source, underwrite, collect payments from, maintain records of, communicate with, and otherwise service the clients that the Company provides working capital to in the form of MCA Receivables.

Manager desires to provide the aforementioned services to Company while protecting Manager’s trade secrets and business systems.

NOW, THEREFORE, in consideration of the mutual covenants and agreements hereinafter set forth, it is hereby agreed as follows:

AGREEMENT

1. General. Company hereby retains the Manager to act as Manager on behalf of Company with regard to the acquisition, management, and general transactional operations related to portfolios of future receivables to be purchased from business enterprises. Without limiting the generality of the foregoing, Manager shall obtain and evaluate such information and advice relating to the businesses and owners selling said receivables, including said businesses credit profiles, financial resources and other pertinent information as it deems necessary or useful to discharge its duties hereunder; shall manage these purchased receivables of Company in a manner consistent with the investment objectives and policies of Company. The Manager shall also furnish to or place at the disposal of Company such of the information, evaluations, analyses and opinions formulated or obtained by the Manager in the discharge of its duties as Company may, from time to time, reasonably request.
2. Manager’s Personnel devoted to this Agreement. The Manager shall, at its own expense, maintain such staff and employ or retain such personnel and consult with such other persons as it shall from time to time determine to be necessary or useful to the performance of its obligations under this Agreement.

3. Expenses of Manager. The Manager shall bear the cost of rendering the management and supervisory services to be performed by it under this Agreement, and shall, at its own expense provide such office space and equipment and such clerical and bookkeeping services as Company shall reasonably require in the conduct of its business. The Manager shall also bear the cost of telephone service, heat, light, power and other utilities provided to Company.

4. Company Obligations. In no way is Manager assuming the general obligations or responsibilities of Company. Company's obligations include, but are not limited to paying brokers' commissions chargeable to Company in connection with the purchase of future receivables to which Company is a party; all taxes, including taxes or fees payable by Company to Federal, State or other governmental agencies; all costs and expenses in connection with the registration and maintenance of registration of Company, and compliance with any agency, federal and state laws/regulations related to its potential solicitation of investor participation in its efforts.

5. Manager/Management Fee. For the services to be rendered, the facilities furnished, and the expenses assumed by the Manager, Company shall pay to the Manager a fixed 9.50% management fee based on the gross funding amount of working capital provided to the Company's client which covers a 7.00% broker commission expense and a 2.50% origination expense is payable to the Manager at the time of funding during the term of this Agreement. In addition, for management and servicing of the Company's receivables, a quarterly management fee totaling 4.50% of the total gross funding amount of working capital provided to the Company's clients during each quarter of a standard calendar year payable seven days after the end of the quarter. The rate of the quarterly management fee is subject to change by the Company and Manager if both parties come to a new mutually agreed upon rate. If no agreement is made between the Company and Manager in regards to the rate of the fee, the rate of the fee defaults to 4.50%, equal to the initial quarterly management fee as described.

6. Manager Best Efforts. The Manager will use its best efforts in the supervision and management of the portfolio of future accounts receivable of Company, but in the absence of willful misfeasance, bad faith, gross negligence or reckless disregard of its obligations hereunder, the Manager shall not be liable to Company or any of its investors for any error of judgment or mistake of law or for any act or omission by the Manager or for any losses sustained by Company or its investors.

7. No Limitation on Other Manager Business Activities. Nothing contained in this Agreement shall prevent the Manager or any affiliated person of the Manager from performing the same services as outlined in this Agreement for any other person, firm or corporation and shall not in any way bind or restrict the Manager or any such affiliated person from managing, buying, selling or trading any future accounts receivable for their own accounts or for the account of others for whom they may be acting. Nothing in this Agreement shall limit or restrict the right of any

director, officer or employee of the Manager to engage in any other business or to devote his or her time and attention in part to the management or other aspects of any other business whether of a similar or dissimilar nature.

8. Term of Agreement. This Agreement shall remain in effect until November 16, 2018 and from year to year thereafter unless at least three months prior to the termination date Company informs Manager of its desire to terminate.

9. Events Causing Termination. The following events shall give rise to the termination of this Agreement. In either of the scenario enumerated under subsections a) or b) herein, the Manager's "Right of First Refusal" as stated in subsection c) below will come into force

- a) The "cashing out" by the Stockholder of more than 16% of Company's outstanding stock;
- b) A transfer in ownership of more than 16% of Company's stock;
- c) Manager Right of First Refusal. During the term of Agreement, before any stock in Company may be sold, offered or transferred to a third party, Company shall first offer said shares to Manager at the same, or a lower price. Thereafter Manager shall have 45 days in which to purchase some or all of the offered stock at the same or agreed upon (lower) price than terms of the confirmed bona fide offer proffered for said shares. In the event, that such a purchase requires the valuation of the stock, said valuation will be based upon a mutually agreed method or conducted by a neutral third party.

10. Termination Obligation to Manager. In the event this Agreement is Terminated, Company will within ninety days pay Manager the equivalent of 25.0% of the total gross funding amount that the Manager has serviced on behalf of Company since the inception of this Agreement.

11. Management of Portfolio.

- a) Administration of Agreements/Purchases of Receivables. Manager may use its discretion with respect to, the administration of the agreements to purchase future receivables and with respect to exercising or not exercising any rights or taking or refraining from taking any action or actions which Manager may be entitled to exercise or take under or in connection with the agreements to purchase future receivables and may, with the consent of Company, modify or waive, or consent to the modification or waiver of, any of the terms or conditions of said agreements.
- b) Standard of Care. Manager shall give the same care and attention to the pool of purchased pool of receivables as Manager gives to the same investments and accounts in which it does not sell participation and, except as otherwise provided in this

Agreement, Manager shall have no further duty or responsibility to Company. Neither Manager nor any of its directors, officers, agents, or employees shall be liable to Company for anything Manager shall do or refrain from doing (a) in the exercise of the aforementioned care and attention, (b) in the exercise by Manager of its best judgment, (c) which may seem to Manager necessary or desirable, or (d) with respect to or in reliance upon any notice, consent, certificate, warranty, or other paper or instrument believed by Manager to be genuine or authentic or to be signed by the proper party or parties; and in any event, neither Manager nor any of its directors, officers, agents, or employees shall be liable to Company except in instances of willful misconduct or gross negligence.

12. Exclusivity. Company will exclusively use Manager for any and all investments, acquisitions, and management of future receivables during the term of this Agreement. Manager is not bound in exclusivity in and of its product offerings or services provided to Company.

13. Non Competition/Non Disclosure. Company acknowledges that the services and products being offered by Manager include proprietary trade secrets of particular significance to Manager and that Company's position with Manager does and will continue to give it an intimate knowledge of Manager's. Due to the unavoidable disclosure of knowhow and trade secrets by the Manager in the furtherance of its duties under this Agreement, Company and its Employees are restricted from competing, directly or indirectly, with Manager or engaging in any finance related work outside of the scope of this Agreement for a period of six months from the execution of this Agreement and from engaging in any other MCA Receivable related work outside of the scope of this Agreement for the duration of this Agreement.

14. Assignment. Manager may assign this agreement or any right or obligation contained within this agreement with prior written consent of Company. The Company and its Employees and Officers shall not be allowed to assign or otherwise compromise their obligations to Manager, specifically, but not limited to those enumerated in the preceding paragraph (Non Competition/Non Disclosure).

15. Controlling Law. This Agreement shall be construed and interpreted in accordance with, and governed by the substantive laws of the Commonwealth of Pennsylvania without regard to choice of law principles.

16. Notices. Any formal notice by one party to be directed to the other party shall be sent by certified mail, or courier service requiring signature of the recipient to the following:

As to Capital Source 2000, Inc.:
Mr. William Bromley
Capital Source 2000, Inc.
200 W. Elm Street
Suite 1223
Conshohocken, PA 19428

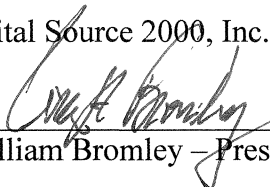
As to Complete Business Solutions Group, Inc.
Attn: Lisa McElhone
141 N. 2nd Street
Philadelphia, PA 19104

17. Counterparts This Agreement may be executed in two or more counterparts, each of which shall be deemed an original but all of which taken together constitutes one and the same instrument

18. Entire Agreement This Agreement contains the entire agreement between the parties with regard to the matters set forth herein and shall be binding upon and inure to the benefit of each party and their successors, attorneys and assigns. There are no other understandings or agreements, verbal or otherwise, between the undersigned.


IN WITNESS WHEREOF, intending to be bound by this Agreement, each of the undersigned has set their hand and seals the date next to their signatures.

Capital Source 2000, Inc.



William Bromley – President

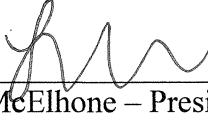
11/16/15
Date



Joseph Cole – Chief Financial Officer

11/16/15
Date

Complete Business Solutions Group Inc.



Lisa McElhone – President

11/24/15
Date

Exhibit “11”

From: [Ellen Belfer](#)
To: [Timothy Kolaya](#)
Subject: Case 9:20-cv-81205-RAR Securities & Exchange Commission v. Complete Business Solutions Group, Inc. et al
Response in Opposition to Motion
Date: Friday, September 20, 2024 5:21:51 PM

Tim,

Regarding representation of Shannon regarding the Eckert settlement, it is my understanding that she is being represented by Cliff Haines for that purpose.

Thanks,
Ellen

Ellen Ross Belfer

Hilgers Graben

ebelfer@hilgersgraben.com | www.hilgersgraben.com

1221 Brickell Avenue

Suite 900

Miami, Florida 33131

239.378.7149 (direct) | **REDACTED** (cell)



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Exhibit 12

**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.

**[PROPOSED] ORDER ESTABLISHING BRIEFING SCHEDULE ON RECEIVER'S
MOTION TO SUPPLEMENT MOTION TO (1) APPROVE PROPOSED PLAN
OF DISTRIBUTION AND (2) AUTHORIZE FIRST INTERIM DISTRIBUTION**

THIS CAUSE comes before the Court upon the Receiver's Motion to Supplement Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution, filed on September 23, 2024 [ECF No. ____] (the "Motion to Supplement"). In the Motion to Supplement, the Receiver details five amendments he wishes to incorporate into his Motion to (1) Approve Proposed Plan of Distribution and (2) Authorize First Interim Distribution [ECF No. 2014] (the "Distribution Motion"). The Court having carefully reviewed the Motion to Supplement and the record in this matter, it is hereby

ORDERED AND ADJUDGED as follows:

1. Any claimants whose claims are impacted by the Motion to Supplement are permitted to file a response to the Motion to Supplement of no more than **ten (10) pages on or before October 7, 2024.**

2. The Receiver shall file a reply to each response, or each category of response if applicable, **on or before October 14, 2024**.

3. The Court will consider the proposed amendments detailed in the Motion to Supplement in conjunction with, and incorporate its rulings as part of, the Court's forthcoming Order on the Distribution Motion.

DONE AND ORDERED in Miami, Florida, this ____ day of September, 2024.

RODOLFO A. RUIZ II
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of record