

Who's Really to Blame?

Welcome back. Today, we are cutting through the "fake news" and government spin to look at the real facts of the Par Funding case. If you have been following along, you know this looks more like a **witch hunt** and **government overreach** every single day.

For the first time, we are showing the videos that are so compelling they should release Joseph LaForte today! These videos feature **John Pauciulo**, a high-powered partner at the massive law firm Eckert Seamans. He was not just some bystander; he was the expert telling "mom and pop" investors that everything was legal and above board.

The "Expert" on the Front Lines

While the government wants to point the finger at Joseph LaForte, look at who the investors actually saw and heard in these videos:

- **The SEC Pedigree:** Pauciulo was a regulator at the SEC itself. Imagine being an investor and hearing from a former SEC guy that the investment is safe!
- **The "Due Diligence" King:** Pauciulo was the one who conducted the due diligence. He was the one who prepared the **Form Ds** and the **PPMs** (Private Placement Memoranda).
- **The Direct Link:** He spoke directly to investors through videos and in-person meetings, representing the "Agent Funds" (like Dean Vagnozzi's) that investors actually put their money into.
- **Dean J. Vagnozzi**, through his company ABetterFinancialPlan.com d/b/a A Better Financial Plan, recruits individuals to create the Agent Funds, offering them the opportunity to open a turnkey Agent Fund that issues and sells securities, complete with training, marketing materials, and an "Agent Guide," as well as a Private Placement Memorandum, corporate registration, and offering materials provided by Vagnozzi's attorney. Vagnozzi manages the Agent Funds through his company ABFP Management Company, LLC, and Abbonizio oversees and coordinates the Agent Funds.

Understanding the "Two-Part" Filing Process

To understand how the government is weaponizing the law here, you need to understand how the paperwork works. It is a **two-part process**:

1. **The Fund Managers (The Front Lines):** These are the people who take the checks from investors. They are required to file **Form Ds** with the SEC. **John Pauciulo represented these managers.** He was the one telling the "check writers" that the Regulation D exemptions were perfectly applicable.
2. **The Company (Par Funding):** Par Funding, as the actual business, also has its own disclosure requirements and its own team of lawyers.

As we discussed in the "Advice of Counsel" piece, Par Funding had a litany of its own high-priced lawyers. **Here is the bombshell: All of them—the Par lawyers and Pauciulo—gave the same advice.** They all agreed this was legal. Joseph LaForte is a businessman, not a lawyer. He has no idea what the intricacies of 1930s securities laws are. He hired the best of the best to handle that. Yet, he is the one **CHARGED WITH SECURITIES FRAUD!!!**

The Real Money Trail

Here is a fact the mainstream media will not tell you: **Joseph LaForte did not even pay Pauciulo.** The fund managers, the ones raising the money from the public—were the ones paying for his legal "expertise." There were **over 40 different Agent Fund managers** who raised hundreds of millions of dollars based on the legal advice and documents provided by Pauciulo.

Dean Vagnozzi, like Joseph LaForte, relied on these experts. They hired the best lawyers money could buy to make sure they were following the rules. Yet, the government has gone after the entrepreneurs while the lawyer who wrote the documents and stood in front of the cameras to educate the investors that everything was in compliance with the SEC.

Joseph LaForte was not even in those marketing videos. He was running a successful merchant cash advance business, the company itself, not the investment arm. If the "experts" at a major law firm file the paperwork and tell the world it is legal, how can the businessman be guilty of "fraud"?

The \$45 Million Referendum: Who is the Real Victim?

Here is the final piece of the puzzle: There was a massive **\$45 million settlement** paid by the law firm Eckert Seamans. In any normal world, a settlement of this size is a loud-and-clear admission that the legal "gatekeepers" failed at their jobs.

But here is the kicker: **The \$45 million went to the Receiver for Par Funding.** Think about that. If the law firm—led by John Pauciulo—paid \$45 million to Par Funding's estate, it is because **Par Funding was the victim of their legal malpractice.** Pauciulo was the expert, the former "SEC man," and the partner at a top-tier firm who conducted the due diligence and told the world the investment was solid.

If he got it wrong, and his firm had to fork over millions because of it, then the responsibility rests on the shoulders of the lawyers, not the businessman who hired them. Joseph LaForte built Par Funding into a massive success, yet he was sentenced to 15.5 years. This settlement is not just a payout; it is a **referendum on LaForte's innocence.** It proves that the "experts" were the ones in control of the legal narrative, and they are the ones who should be held accountable, not the man who was busy running the actual company.

FOR PROOF OF \$45M ECKERT SEAMAN'S SETTLEMENT- SEE FILING DE 1861 ON 5/6/2024 FROM THE SEC V. COMPLETE BUSINESS SOLUTIONS GROUP, INC

d/b/a/ PAR FUNDING CASE. UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO.: 20-CV-81205-RAR

The Video Evidence

We are releasing the videos that prove exactly who was giving the advice to the investors. These videos show Pauciulo—the man the fund managers paid—on the front lines:

- **September 2016:** Pauciulo pitching the safety of the structure.
- **June 2017:** More "due diligence" assurances.
- **April 2018:** Standing behind the Regulation D exemptions.

EXHIBITS: LINKS TO VIDEOS MENTIONED ABOVE

<https://vimeo.com/1162538542?fl=pl&fe=cm>

<https://vimeo.com/1162538478?fl=pl&fe=cm>

<https://vimeo.com/1162538421?fl=pl&fe=cm>

It is the same old story: the government ignores the people who actually "blessed" the deals and goes after the successful outsiders who do not fit their narrative. How is this justice?