

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 20-cv-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

COMPLETE BUSINESS SOLUTIONS GROUP, INC.

d/b/a PAR FUNDING, *et al.*

Defendants,

and

THE LME 2017 FAMILY TRUST, a/k/a

LME 2017 FAMILY TRUST,

Relief Defendant.

\_\_\_\_\_ /

**DEFENDANT, MICHAEL C. FURMAN'S, MOTION FOR LEAVE  
TO PROCEED *IN FORMA PAUPERIS* AND SUPPORTING AFFIDAVIT**

Defendant, Michael C. Furman (“*Mr. Furman*”), by and through undersigned counsel, files this Motion for Leave to Proceed *In Forma Pauperis* and Supporting Affidavit, and hereby requests leave to file a Writ of Certiorari to the United States Court of Appeals for the Eleventh Circuit without prepayment of costs and to proceed *in forma pauperis*.

This Motion is being brought pursuant to Rule 24 of the Federal Rules of Appellate Procedure.

Respectfully submitted,

**MILLENNIAL LAW, INC.**

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By: *s/ Zachary P. Hyman* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this **11th** day of July, 2022, the foregoing was filed using the Court's CM/ECF Filing system which will transmit Notices of Electronic Filing generated by CM/ECF to all counsel of record.

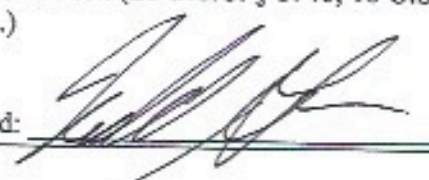
By: *s/ Zachary P. Hyman* \_\_\_\_\_

Zachary P. Hyman

UNITED STATES DISTRICT COURT  
for the  
Southern DISTRICT OF Florida

<u>Securities and Exchange Commission</u>	)	
	)	
Plaintiff	)	
	)	
v.	)	
	)	Case No. <u>20-cv-81205</u>
<u>Michael Furman</u>	)	
	)	
Defendant	)	

**AFFIDAVIT ACCOMPANYING MOTION  
FOR PERMISSION TO APPEAL IN FORMA PAUPERIS**

Affidavit in Support of Motion	Instructions
<p>I swear or affirm under penalty of perjury that, because of my poverty, I cannot prepay the docket fees of my appeal or post a bond for them. I believe I am entitled to redress. I swear or affirm under penalty of perjury under United States laws that my answers on this form are true and correct. (28 U.S.C. § 1746; 18 U.S.C. § 1621.)</p>	<p>Complete all questions in this application and then sign it. Do not leave any blanks: if the answer to a question is "0," "none," or "not applicable (N/A)," write that response. If you need more space to answer a question or to explain your answer, attach a separate sheet of paper identified with your name, your case's docket number, and the question number.</p>
<p>Signed: </p>	<p>Date: <u>6/22/22</u></p>

My issues on appeal are: Whether the trial court committed error in failing to provide jury instructions concerning exemptions, whether the trial court improperly allowed rebuttal witnesses, whether improper comments of the SEC during closing impacted trial, whether Furman's due process rights were violated.

1. *For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.*

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You 1400	Spouse	You 4000	Spouse
Employment	\$ 1400	\$	\$ 4000	\$
Self-employment	\$	\$	\$	\$
Income from real property (such as rental income)	\$	\$	\$	\$
Interest and dividends	\$	\$	\$	\$
Gifts	\$	\$	\$	\$
Alimony	\$	\$	\$	\$
Child support	\$	\$	\$	\$
Retirement (such as social security, pensions, annuities, insurance)	\$	\$	\$	\$
Disability (such as social security, insurance payments)	\$	\$	\$	\$
Unemployment payments	\$	\$	\$	\$
Public-assistance (such as welfare)	\$	\$	\$	\$
Other (specify):	\$	\$	\$	\$
<b>Total monthly income:</b>	<b>\$ 1,400</b>	<b>\$</b>	<b>\$ 4,000</b>	<b>\$</b>

2. *List your employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)*

Employer	Address	Dates of employment	Gross monthly pay
Century Health & Life	3020 N Military Trail, Boca Raton FL 33431	3/1/22 to current	\$ 4,000
Family Office Networks	307 evernia st, west palm beach, 33401	10/21 - 12/21	\$ 650
Assurance IQ	920 5th Ave., Ste 3600, Seattle, WA 98104	1/21-12/21	\$ 1,000



3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of employment	Gross monthly pay
			\$
			\$
			\$

4. How much cash do you and your spouse have? \$400 est

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial Institution	Type of Account	Amount you have	Amount your spouse has
Synovus	Checking	\$ 3000	\$-
Webull	Investment	\$ 750	\$
		\$	\$

If you are a prisoner seeking to appeal a judgment in a civil action or proceeding, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

Home	Other real estate	Motor vehicle #1
(Value) \$ 450000	(Value) \$ 0	(Value) \$ 25000
Mortgaged*	Car is Financed*	Make and year: 2015 Mercedes
		Model: e63
		Registration #: 609049441

Motor vehicle #2	Other assets	Other assets
(Value) \$	(Value) \$	(Value) \$
Make and year:		
Model:		
Registration #:		

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
	\$	\$
	\$	\$
	\$	\$
	\$	\$

7. State the persons who rely on you or your spouse for support.

Name [or, if under 18, initials only]	Relationship	Age
Christine Furman	Mother	70
Thomas Furman	Father	72

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate.

	You	Your Spouse
Rent or home-mortgage payment (including lot rented for mobile home) Are real estate taxes included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Is property insurance included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	\$ 2500	\$
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 400	\$
Home maintenance (repairs and upkeep)	\$ 1000	\$
Food	\$ 1600	\$
Clothing	\$ 100	\$
Laundry and dry-cleaning	\$ 50	\$
Medical and dental expenses	\$ 400	\$
Transportation (not including motor vehicle payments)	\$ 600	\$
Recreation, entertainment, newspapers, magazines, etc.	\$ 50	\$
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's:	\$ 0	\$
Life:	\$ 10	\$
Health:	\$ 500	\$
Motor vehicle:	\$ 233	\$
Other:	\$	\$
Taxes (not deducted from wages or included in mortgage payments) (specify):	\$ -	\$
Installment payments <b>PAYING INSURANCE CHARGEBACK - 250 PER MONTH</b>		
Motor Vehicle: CAR PAYMENT	\$ 833	\$
Credit card (name): CHASE, BANK OF AMERICA	\$ 750	\$
Department store (name):	\$	\$
Other:	\$	\$



Alimony, maintenance, and support paid to others	\$	\$
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 200	\$
Other (specify):	\$	\$
<b>Total monthly expenses:</b>	<b>\$ 9476</b>	<b>\$</b>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes  No If yes, describe on an attached sheet.

Potential sec judgement coming, emergency roof & ac repair, credit card payments, attorney fees, chargeback debt, health & dental surgeries

10. Have you spent - or will you be spending - any money for expenses or attorney fees in connection with this lawsuit?  Yes  No

If yes, how much? \$ 200-1000 per month

11. Provide any other information that will help explain why you cannot pay the docket fees for your appeal.

See attached Declaration.

12. State the city and state of your legal residence

Florida, West Palm Beach

Your daytime phone number: 5612027345

Your age: 40 Your years of schooling: 4