

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.

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**DEFENDANT, MICHAEL C. FURMAN'S, NOTICE OF FILING DECLARATION OF  
MICHAEL FURMAN**

Defendant, Michael C. Furman ("*Mr. Furman*") files this Notice of Declaration of Michael Furman in connection with the *Motion for Leave to Appeal in Forma Pauperis* [DE 1300].

Respectfully submitted,

**MILLENNIAL LAW, INC.**

*Attorneys for Michael C. Furman*

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By: *s/ Zachary P. Hyman*

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this **13th** 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

**DECLARATION OF MICHAEL FURMAN**

1. My name is Michael Furman, I am over the age of 21 and have personal knowledge of the facts set forth in the attached Declaration.

2. I am otherwise competent to testify to the facts set forth in this Declaration.

3. If called to testify, I would testify truthfully as to the matters set forth in this declaration, in addition to the Affidavit submitted to the Court in support of my Motion for Leave to Proceed in Forma Pauperis.

4. I currently own a residence whose address is 736 Cresta Circle. The appraised value of the house is \$356,740, with a mortgage of \$344,419, and a past due balance of \$28,825. The residence is my homestead and is otherwise exempt from execution under state law.

5. I also own a 2015 Mercedes Benz that is 100% financed since purchased. The sedan has approximately 100,000 miles on it, and a Kelly Blue Book value of \$28,496. I currently owe \$22,643 on the vehicle, which is need of over \$7,000 of overdue service & repairs.

6. I am also the provider for my parents who currently live with me on fixed income. My parents are 70 and 72 respectively and, as a result rely on me for support.

7. I have net earning of more than \$750 per week but have not agreed in writing to have my wages garnished.

8. From the commencement of this case until January 2022, I was not able to work and as a result, have maxed out all of my credit cards, continue to make minimum payments on my credit cards used to pay living & business expenses during this time, pay minimum payments on my insurance chargebacks, and do not otherwise have assets to pay filing fees and for the cost of transmitting the record on appeal.

9. I was forced to use what savings I had left and borrow the very last of my family's savings to attempt to pay for representation. I was forced to spend extraordinary amounts to even comply with trial orders such as the evidence binders last minute without credit for only the court and SEC as seen in the attached receipt. I then was forced to handprint and assemble the 20 plus binders myself with my family on my home printer for my legal defense.

10. In addition, I agreed to pay Knight Law \$60,000 to assist in my defense. I currently dispute the amounts due and owed to Knight Law, but they claim that I still owe them \$33,000. The law firm of Sallah Astarita & Cox also claims that I owe it \$14,463.53 for services rendered.

11. I am also saving up all of my leftover disposable income if any (which is very limited) towards dental surgery that is medically necessary as I am missing 3 teeth & have a necessary surgery scheduled.

12. I also have had a large amount of necessary medical expenses since this case has started. In 2022 alone, I was unable to work for 4-5 weeks due to pneumonia, I have contracted Covid-19.

13. Since the commencement of this case, I have also developed an allergic reaction to most food. This has increased the expenses that I have to pay to provide for my health.

14. In addition, I had to pay \$5,000 to replace one of the air conditioning units to my residence, with the second unit needing replacement before the end of the year. The repair to the residence was necessary to protect my parents' health and safety, as they could suffer heat stroke without air conditioning. My residence also has a roof leak, which will cost between \$5,000 and \$12,000 to repair. My parents' health also depends on these repairs, because if they are not completed, black mold will grow.

15. I do not otherwise have assets that can be used to satisfy a judgment or pay for filing fees.

**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I declare, verify and state, under penalty of perjury under the laws of the United States of America, that I have reviewed the foregoing declaration and all of the statements contained herein are true and correct to the best of my information and belief.

  
MICHAEL FURMAN