

**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,

_____ /

DECLARATION OF MICHAEL J. ROESSNER

I, MICHAEL J. ROESSNER, declare as follows:

1. I am an Assistant Chief Litigation Counsel with the United States Securities and Exchange Commission (“Commission”), Division of Enforcement, Office of Collections, in Washington, D.C., and I am personally familiar with the facts stated herein. I am also the attorney assigned to collection efforts on the judgment obtained against Defendant Lisa McElhone.

2. As of date of this declaration, McElhone has not satisfied the amounts due on the Judgment entered against her in this action and owes \$22,917,203.31 on the civil penalty and \$158,071,169.92 in disgorgement for a total of

\$180,988,373.23.

3. McElhone has never provided the SEC with an accounting of any kind.

4. Attached as Exhibit 1 is a true and correct copy of the Financial Statement Prepared by Lisa McElhone and filed by the Receiver on October 6, 2020 at Docket Number 305-1.

I declare under penalty of perjury pursuant to the provisions of 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed December 15, 2023, at Washington, District of Columbia.

s/MICHAEL J. ROESSNER
MICHAEL J. ROESSNER
Assistant Chief Litigation Counsel
U.S. Securities and Exchange Commission

Exhibit “1”

From: [Joe Mack](#) on behalf of [Joe Mack <joe@parfunding.com>](#)
To: [jamie@parfunding.com](#)
Subject: FW: Personal Financial Statement
Date: Monday, June 15, 2020 6:06:49 PM
Attachments: [Personal Financial Statement Trust.xlsx](#)

From: Lisa Mc <lisa.mcelhone@gmail.com>
Sent: Monday, June 15, 2020 3:07 PM
To: Joe Mack <joe@parfunding.com>
Subject: Personal Financial Statement

Hi,



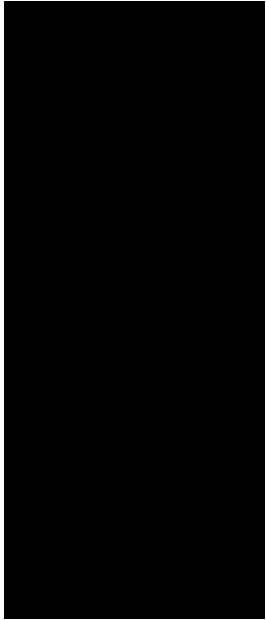



See updated Personal Financial Statement attached. I totalled it by category and did a grand total at the bottom. This is impressive!!!!

We can make corrections or revisions for anything you see that needs to be changed.

Let me know xoxo

Regards,

Lisa McElhone

Company Names	Type	Valuation	Purchase Price	Note
Complete Business Solutions Group	MCA Portfolio	\$ 250,000,000.00		
Fast Advance Funding LLC	MCA Portfolio	\$ 15,000,000.00		Own 70%
Capital Source 2000	MCA Portfolio	\$ 35,000,000.00		
Contract Financing Solutions	MCA Portfolio	\$ 17,000,000.00		
Recruiting & Marketing Resources	MCA Broker/ISO	\$ 5,000,000.00		
Full Sprectrum Processing	Processing Company	\$ 1,000,000.00		
		\$ 323,000,000.00		
Heritage Business Consulting	Alternative Investment Co	\$ 26,500,000.00		
Eagle Six Consultants Inc.	Alternative Investment Co	\$ 47,400,000.00		
		\$ 73,900,000.00		
LME Fam Trust 2017	Trust	\$ 115,000.00		
	Holding Company	\$ 10,500,000.00		Investment accounts (Stocks, EFTs, Mutuals)
		\$ 10,615,000.00		
	Nail Salon	\$ 500,000.00		
Metro Physical Medicine Group Inc	Medical	\$ 250,000.00		Physical Therapy Clinic
		\$ 750,000.00		
Pink Lion LLC	Property Holding	\$ -		Vail CO Condo & Hotel (\$160mm /50%)
	Property Holding	\$ -	\$ 34,000,000.00	
	Property Management	\$ -		
	Property Holding	\$ 600,000.00	\$ 500,000.00	
	Property Holding	\$ 600,000.00	\$ 500,000.00	
	Property Holding	\$ 3,000,000.00	\$ 3,000,000.00	
	Property Holding	\$ 3,500,000.00	\$ 3,500,000.00	
	Property Holding	\$ 1,200,000.00	\$ 1,200,000.00	
	Property Holding	\$ 850,000.00	\$ 850,000.00	
	Property Holding	\$ 800,000.00	\$ 800,000.00	
	Property Holding	\$ 4,000,000.00	\$ 2,600,000.00	
	Property Holding	\$ 2,900,000.00	\$ 2,900,000.00	
	Property Holding	\$ 650,000.00	\$ 650,000.00	
	Property Holding	\$ 1,100,000.00	\$ 1,100,000.00	
	Property Holding	\$ 8,000,000.00	\$ 7,600,000.00	
	Property Holding	\$ 5,000,000.00	\$ 4,600,000.00	
	Property Holding	\$ 1,900,000.00	\$ 1,900,000.00	
	Property Holding	\$ 850,000.00	\$ 850,000.00	
	Property Holding	\$ 2,900,000.00	\$ 2,900,000.00	
	Property Holding	\$ 2,950,000.00	\$ 2,950,000.00	
	Property Holding	\$ 800,000.00	\$ 800,000.00	
	Property Holding	\$ 1,800,000.00	\$ 1,800,000.00	
	Property Holding	\$ 6,600,000.00	\$ 6,600,000.00	
	Property Holding	\$ 1,640,000.00	\$ 1,640,000.00	
	Personal Real Estate	\$ 7,000,000.00	\$ 5,800,000.00	
	Personal Real Estate	\$ 560,000.00	\$ 407,000.00	
Golf Course		\$ -		
		\$ 59,200,000.00		
Eagle Union Quest One	Plane Holding Entity	\$ 8,000,000.00	\$ 8,000,000.00	
Artwork	Art	\$ 3,000,000.00	\$ 3,000,000.00	
2019 Porsche Turbo S	Auto	\$ 250,000.00	\$ 232,600.00	
2020 Range Rover	Auto	\$ 155,000.00	\$ 128,185.00	
2016 Bentley Mulsanne	Auto	\$ 185,000.00	\$ 184,841.00	Owned by HBC
2020 Mercedes G550	Auto	\$ 150,000.00	\$ 117,754.00	
2016 Chevy Tahoe	Auto	\$ 50,000.00		
		\$ 790,000.00		
Liberty Sixth Avenue LLC	pending			Technology Advisors owner
Liberty Seventh Avenue LLC	pending	\$ 3,000,000.00		Colorado World / Colorado Farms Holding Arkansas 1st Position Lien 3.7mm Owns Ft Worth TX CKD Facility (Texas Mine) 7.3mm Royalties of \$1 per ton CKD
Liberty Eighth Avenue LLC	Property Holding	\$ 5,500,000.00		Owns 40% Vision Solar, 40% Alternative Materials, 40% Kingdom Logistics, 40% CNP, 40% Rare Elements of the world
Colorado Sky		\$ -		Solar Install Company- Own 40%
Vision Solar LLC	Construction	\$ 75,000,000.00		

Alternative Materials		\$ 68,000,000.00	Colorado Sky Owns 40%
Kingdom Logistics		\$ 100,000,000.00	Marianna & Double Mountain
Colorado Natural Products		\$ 50,000,000.00	
My CBD Lab	CBD Brand	\$ -	
Rare Earth Elements of The World		\$ 15,000,000.00	
		\$ 316,500,000.00	

TOTAL ASSETS **\$ 795,755,000.00**

[REDACTED]	[REDACTED]		
Eagle Union Quest Two	Plane Management		
Millenium Holdings Limited LLC			
Solar Exchange LLC	Construction Broker		
Solar Dogs LLC	Holding Company		
[REDACTED]	Property Holding		hoa entity
Manitou Boat			
Waverunner			
Waverunner			