

Smoking Gun Emails Reveal SEC Violated Its Own Regulations, Outsourcing Enforcement to a Private Adversary

A shocking newly uncovered email chain has exposed a profound subversion of justice, revealing that the SEC's case against Par Funding was built not on independent government fact-finding, but on a rushed, sloppy campaign orchestrated by a private adversary.

The timeline tells the entire story. A full month before the SEC launched its enforcement action in July 2020, the agency was not conducting a fair or balanced inquiry. Instead, they completely abandoned their strict regulatory mandates.

To understand the depth of this injustice, one must look at the actual legal standards the SEC completely cast aside:

The Legal Standards the SEC Ignored

The Requirement for Independent Investigation:

Under standard administrative protocols and the SEC Enforcement Manual, regulatory agencies have a strict duty to function as neutral, independent factfinders. Investigations must not be outsourced to private adversaries or conflicted third parties. Relying blindly on an adversarial party's pre-packaged narrative violates the core tenet of due diligence. Investigators are expected to independently interview witnesses, cross-examine claims, and check the accuracy of accusations against objective evidence before deploying them in court enforcement actions.

Rules Governing Proper Declarations and Affidavits:

Under federal legal standards (such as Federal Rule of Civil Procedure 56 and related evidentiary rules) governing statements used to secure emergency court orders, a declaration must be made on personal knowledge, set forth facts that would be admissible in evidence, and show that the declarant is competent to testify on the matters stated. A declarant must fully understand what they are signing, the context of the legal proceedings, and the accuracy of the statements therein. Taking declarations without verifying if the witness understands how their words are being leveraged undermines the integrity of the judicial process.

*****The Freedom Fighters wonder if the merchants/declarants actually knew the context of the legal proceedings and how their affidavits were going to be used**

especially since the case was filed *Ex-Parte*'. It is obvious that Heskin and Berlin were working in collusion to bypass federal rules that govern plaintiff counsel.

The "Urgent" Rush to Bypass Federal Rules

In an email broadcast marked with "Importance: High" sent on July 6, 2020, private attorney, and Par Funding's long-term adversary, Shane Heskin blasted out a frantic checklist to multiple merchants regarding Par Fundings underwriting practices.

"This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements..." Isn't the SEC supposed to be doing this investigation according to their manual mandate???

This was not an orderly collection of facts; it was a mad scramble to manufacture a narrative. Within hours, Heskin was feeding these raw responses directly to SEC attorney Amie R. Berlin. The emails show Heskin serving as the direct pipeline, aggressively pushing for merchant signoffs to hand over to the government: Amie Berlin asked, *"Did u send me the affidavit for this one yet?"*

By failing to conduct their own neutral inquiry, the SEC effectively deputized a private actor with an explicit financial motive to function as their de facto prosecutor. They did zero independent verification, completely bypassing the strict guidelines set forth in the SEC Enforcement Manual. They blindly took the word of a biased adversary as absolute law as we have displayed in our last post as described in full detail by Par Fundings long-time general counsel, Norman Mount Valz in his declaration.

EXHIBIT: Heskin Forwarded Emails to Amie R. Berlin dated 2020-07-07 -Subject: CBSG Underwriting Questions (21 days before SEC complaint was brought against Par Funding)

Heskin sent this blanket email to Par Fundings merchants and forwarded all the replies to Amie Berlin!

****Read the full, unedited email chain here proving the SEC outsourced its investigation**

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T07:05:51-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T07:06:44-04:00

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Jim Frost <jim@nationalrx.com>
Date: Monday, Jul 06, 2020, 11:46 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: Re: CBSG Underwriting Questions

CAUTION: This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

For NationalRx

Item 6 is Yes. All others are No.

Sent from my iPhone

> On Jul 6, 2020, at 11:07 PM, Heskin, Shane <sheskins@whiteandwilliams.com> wrote:
>

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T08:16:47-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T08:18:08-04:00

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Julie Katz <julie@tourmappers.com>
Date: Tuesday, Jul 07, 2020, 7:38 AM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Cc: Wells, Stuart <stwellsw@whiteandwilliams.com>
Subject: RE: CBSG Underwriting Questions

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Morning,

Please see my responses below.

Julie Katz
Julie@TourMappers.com
132 Baylston Street, 4th Floor | Boston, MA 02116
P 617.236.1236 ext. 105 M 617.921.6948
TourMappers American Experiences
We're Making Your Business.  

From: Heskin, Shane <sheskins@whiteandwilliams.com>
Sent: Monday, July 6, 2020 11:08 PM
Cc: Wells, Stuart <stwellsw@whiteandwilliams.com>; Proper, Justin <Properj@whiteandwilliams.com>; Chad Frost <chad@volunteerpharmacy.com>; jim@nationalrx.com <jim@nationalrx.com>; Shane Perkins <shane@legendsolar.com>; MICHAEL FOTI <mfo26@aol.com>; Pam Fleetwood <pam@fleetwoodservices.net>; Julie Caricato - Indoor Playgrounds Int'l <juliec@indoorplaygroundsintl.com>; Kara DiPietro <k.dipietro@hmcincorporated.com>; Mary Carleton <mary@capjets.com>; Sean Whalen <seanwhalen71@gmail.com>; James Bowen <tbowen20@hotmail.com>; Gianna Woffe <gianna@radiantimages.com>; gianna@radiantimages.com <gianna@radiantimages.com>; Bruce Mcnider <bruce.mcnider@hotmail.com>; bruce.mcnider@hotmail.com <bruce.mcnider@hotmail.com>; Shaun Alldredge <shaunaldredge11@gmail.com>; Michael Heller <michael.heller@bmsigroup.com>; nickstellin007@gmail.com <nickstellin007@gmail.com>; Amos Jones <jones@amosjoneslawfirm.com>; bhartig528@gmail.com <bhartig528@gmail.com>;

Julie Katz <julie@tourmappers.com>; Joshua Speakman <jsjspeakman1212@gmail.com>; Barry Limer <blimer22@gmail.com> <blimer22@gmail.com>
Subject: CBSG Underwriting Questions
Importance: High

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:
1) Offer insurance: Yes/No __NO__
2) Perform credit check: Yes/No __NO__
3) Perform background check __NO__
4) Perform onsite inspection: Yes/No __NO__, but I did have to email pictures of my office to the sales rep __
5) Perform personal interview: Yes/No __NO__ really but had a funding call. It was just to get into my account __
6) Underwritten in less than 48 hours: Yes/No __YES__
7) Assign you a personal liaison: Yes/No __NO__
8) Conduct social media research: Yes/No __Not that I'm aware of__
9) Request expense information: Yes/No __I had to send an A/R list to a sales rep (external to CBSG), but not expenses other than that__
10) Request profit margins: Yes/No __NO__
11) Request AR report: Yes/No __YES__
12) Request debt schedule: Yes/No __NO__
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T07:04:06-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T07:04:17-04:00

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: MICHAEL FOTI <mfo26@aol.com>
Date: Tuesday, Jul 07, 2020, 6:21 AM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: Re: CBSG Underwriting Questions

CAUTION: This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

Shane

Let me know if you need me to print form and fill out.

1. No
2. Not sure
3. No
4. No
5. No
6. Yes
7. No
8. No not sure
9. NO
10. No
11. Yes
12. No

Michael Foti
President
SRA HOME PRODUCTS

On Jul 6, 2020, at 11:07 PM, Heskin, Shane <sheskins@whiteandwilliams.com> wrote:

This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:

- 1) Offer insurance: Yes/No _____
 - 2) Perform credit check: Yes/No _____
 - 3) Perform background check _____
 - 4) Perform onsite inspection: Yes/No _____
 - 5) Perform personal interview: Yes/No _____
 - 6) Underwritten in less than 48 hours: Yes/No _____
 - 7) Assign you a personal liaison: Yes/No _____
 - 8) Conduct social media research: Yes/No _____
 - 9) Request expense information: Yes/No _____
 - 10) Request profit margins: Yes/No _____
 - 11) Request AR report: Yes/No _____
 - 12) Request debt schedule: Yes/No _____
- Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

6) Underwritten in less than 48 hours: Yes/No _____

No.

7) Assign you a personal liaison: Yes/No _____

They didn't call them that, but yes, I had a personal liaison.

8) Conduct social media research: Yes/No _____

Not that I know of, but I don't know.

9) Request expense information: Yes/No _____
Yes.

10) Request profit margins: Yes/No _____

I don't think so.

11) Request AR report: Yes/No _____
Yes.

12) Request debt schedule: Yes/No _____

I don't think so.

Please get back to me ASAP and feel free to call me with any questions.

Thanks!
-Shane

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-10T18:32:37-04:00
Importance: High
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-10T18:32:46-04:00

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Did u send me the affidavit for this one yet?

From: Amos Jones <jones@amosjoneslawfirm.com>
Date: Monday, Jul 06, 2020, 11:35 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: RE: CBSG Underwriting Questions

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Answers from Amos Jones d/b/a/ Amos Jones Law Firm:

Hi all,

This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:

1) Offer insurance: Yes/No _____
No.

2) Perform credit check: Yes/No _____

I don't think so. (I just checked my Experian report for inquiries around that time and saw nothing that appeared to be from them.)

3) Perform background check _____

I don't think so.

4) Perform onsite inspection: Yes/No _____

Was going to, and scheduled a visitor, but we did not receive the visitor and so CBSG instead requested and received photos of my office's interior,

5) Perform personal interview: Yes/No _____

Yes.

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T10:35:58-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T10:36:28-04:00

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: jim@nationalrx.com <jim@nationalrx.com>
Date: Tuesday, Jul 07, 2020, 10:34 AM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: RE: CBSG Underwriting Questions

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Shane
I responded last night and want to make one clarification. On item 9, they did request bank statements and an application. The bank statements were more for their use in setting up ACH for daily payments.
Thanks,
Jim

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

From: "Heskin, Shane" <sheskins@whiteandwilliams.com>
Sent: Monday, July 6, 2020 11:07pm

To:

Cc: "Wells, Stuart" <Wells@whiteandwilliams.com>, "Proper, Justin" <Properj@whiteandwilliams.com>, "Chad Frost" <chad@volunteerpharmacy.com>, "Jim@nationalrx.com" <jim@nationalrx.com>, "Shane Perkins" <shane@legendsolar.com>, "MICHAEL FOTI" <mftot26@aol.com>, "Pam Fleetwood" <pam@fleetwoodsolutions.net>, "Julie Caricato - Indoor Playgrounds Int'l" <juliec@indoorplaygroundsintl.com>, "Kara DiPietro" <k.dipietro@hmcincorporated.com>, "Mary Carleton" <mary@capjets.com>, "Sean Whalen" <seanwhalen71@gmail.com>, "James Bowen" <tbowen20@hotmail.com>, "Gianna Wolffe (gianna@radiantimages.com)" <gianna@radiantimages.com>, "Bruce Mcnider (bruce.mcnider@hotmail.com)" <bruce.mcnider@hotmail.com>, "Shaun Allorede" <shaunallorede11@gmail.com>, "Michael Heller" <michael.heller@mhsgroup.com>, "nickstellini007@gmail.com" <nickstellini007@gmail.com>, "Amos Jones" <jones@amosjoneslawfirm.com>, "bhartig528@gmail.com" <bhartig528@gmail.com>, "Julie Katz" <julie@tourmappers.com>, "Joshua Speakman" <jsjcspeakman1212@gmail.com>, "Barry Limer (blimer22@gmail.com)" <blimer22@gmail.com>

Subject: CBSG Underwriting Questions

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:
1) Offer insurance: Yes/No ____
2) Perform credit check: Yes/No ____
3) Perform background check ____
4) Perform onsite inspection: Yes/No ____
5) Perform personal interview: Yes/No ____
6) Underwritten in less than 48 hours: Yes/No ____
7) Assign you a personal liaison: Yes/No ____
8) Conduct social media research: Yes/No ____
9) Request expense information: Yes/No ____
10) Request profit margins: Yes/No ____
11) Request AR report: Yes/No ____
12) Request debt schedule: Yes/No ____
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

2) Perform credit check: Yes/No ____
3) Perform background check ____
4) Perform onsite inspection: Yes/No ____
5) Perform personal interview: Yes/No ____
6) Underwritten in less than 48 hours: Yes/No ____
7) Assign you a personal liaison: Yes/No ____
8) Conduct social media research: Yes/No ____
9) Request expense information: Yes/No ____
10) Request profit margins: Yes/No ____
11) Request AR report: Yes/No ____
12) Request debt schedule: Yes/No ____
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T07:03:26-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T07:03:36-04:00

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From: Sean Whalen <seanwhalen1@gmail.com>
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: Re: CBSG Underwriting Questions

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Shane,
With respect to all of these questions: they had requested AR report and/or debt schedule (But not every time... typically only bank statements).

Deals were underwritten in 48 hours or less typically and I don't know if they would consider the phone call with Laforte a "personal interview".

Last, I am unaware of any personal credit check or background check (very highly doubt this), but they obviously had SSN, so may have been able to if they wanted to.

No. to all other items.

Sean

On Jul 6, 2020, at 11:07 PM, Heskin, Shane <sheskins@whiteandwilliams.com> wrote:

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:
1) Offer insurance: Yes/No ____

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T07:06:54-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T07:07:09-04:00

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Chad Frost <chadf@volunteerpharmacy.com>
Date: Monday, Jul 06, 2020, 11:37 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: Re: CBSG Underwriting Questions

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Chad Frost
865.951.3925

On Jul 6, 2020, at 11:07 PM, Heskin, Shane <sheskins@whiteandwilliams.com> wrote:

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:

- 1) Offer insurance: Yes/No ____ No
- 2) Perform credit check: Yes/No ____ Occasionally
- 3) Perform background check ____ No
- 4) Perform onsite inspection: Yes/No ____ No
- 5) Perform personal interview: Yes/No ____ No
- 6) Underwritten in less than 48 hours: Yes/No ____ Yes
- 7) Assign you a personal liaison: Yes/No ____ No
- 8) Conduct social media research: Yes/No ____ No
- 9) Request expense information: Yes/No ____ Bank Statements Only
- 10) Request profit margins: Yes/No ____ No

11) Request AR report: Yes/No ___No
12) Request debt schedule: Yes/No ___No
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

4) Perform onsite inspection: Yes/No ___came to my office
5) Perform personal interview: Yes/No ___There was conversations with Joe Mack prior to funding___
6) Underwritten in less than 48 hours: Yes/No ___Yes___
7) Assign you a personal liaison: Yes/No ___There were a few people involved___
8) Conduct social media research: Yes/No ___Not that I know___
9) Request expense information: Yes/No ___no___
10) Request profit margins: Yes/No ___no___
11) Request AR report: Yes/No ___no___
12) Request debt schedule: Yes/No ___Not that I recall___
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T19:23:54-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T19:24:03-04:00

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Another one.

From: Michael Heller <michael.heller@mhmgroup.com>
Date: Tuesday, Jul 07, 2020, 6:58 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: RE: CBSG Underwriting Questions

CAUTION: This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

Please responses below. My answers are to the best of my recollection.

From: Heskin, Shane <sheskins@whiteandwilliams.com>
Sent: Monday, July 6, 2020 11:08 PM
Cc: Wells, Stuart <Wells@whiteandwilliams.com>; Proper, Justin <Properj@whiteandwilliams.com>; 'Chad Frost' <chad@volunteerpharmacy.com>; 'jim@nationalrx.com' <jim@nationalrx.com>; 'Shane Perkins' <shane@legendsolar.com>; 'MICHAEL FOTI' <mfoti26@aol.com>; 'Pam Fleetwood' <pam@fleetwoodsolutions.net>; 'Julie Caricato - Indoor Playgrounds Int'l' <juliec@indoorplaygroundsintl.com>; 'Kara DiPietro' <k.dipietro@hmcincorporated.com>; 'Mary Carletto' <mcarly@capjets.com>; 'Sean Whalen' <seanwhalen71@gmail.com>; 'James Bowen' <tbowen20@hotmail.com>; 'Gianna Wolfe' <gianna@radiantimages.com>; 'gianna@radiantimages.com' <gianna@radiantimages.com>; 'Bruce Mcnider' <bruce.mcnider@hotmail.com>; 'Bruce Mcnider' <bruce.mcnider@hotm.com>; 'Amos Jones' <jones@amosjoneslawfirm.com>; 'bhartig528@gmail.com' <bhartig528@gmail.com>; 'Amos Jones' <jones@amosjoneslawfirm.com>; 'Joshua Speakman' <jsjspeakman1212@gmail.com>; Barry Limer <blimer22@gmail.com>; 'blimer22@gmail.com'
Subject: CBSG Underwriting Questions
Importance: High

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:
1) Offer insurance: Yes/No ___no___
2) Perform credit check: Yes/No ___no___
3) Perform background check ___no___

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T13:24:37-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T13:24:46-04:00

.....
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Bruce Mcnider <bruce.mcnider@hotmail.com>
Date: Tuesday, Jul 07, 2020, 1:22 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: Re: CBSG Underwriting Questions

CAUTION: This message originated outside of the firm. Use caution when opening attachments, clicking links or responding to requests for information.

1) Offer insurance: Yes/No ___no___
2) Perform credit check: Yes/No ___no___
3) Perform background check ___no___
4) Perform onsite inspection: Yes/No ___I don't remember one mca company did from a local finance place here in town___
5) Perform personal interview: Yes/No ___over phone___
6) Underwritten in less than 48 hours: Yes/No ___yes___
7) Assign you a personal liaison: Yes/No ___yes___
8) Conduct social media research: Yes/No ___no___
9) Request expense information: Yes/No ___no___
10) Request profit margins: Yes/No ___no___
11) Request AR report: Yes/No ___no___
12) Request debt schedule: Yes/No ___just other mcas and mortgage___

Get Outlook for iOS

From: Heskin, Shane <sheskins@whiteandwilliams.com>
Sent: Monday, July 6, 2020 10:07:30 PM
Cc: Wells, Stuart <Wells@whiteandwilliams.com>; Proper, Justin <Properj@whiteandwilliams.com>; 'Chad Frost' <chad@volunteerpharmacy.com>; 'jim@nationalrx.com' <jim@nationalrx.com>; 'Shane Perkins' <shane@legendsolar.com>; 'MICHAEL FOTI' <mfoti26@aol.com>; 'Pam Fleetwood' <pam@fleetwoodsolutions.net>; 'Julie Caricato - Indoor Playgrounds Int'l' <juliec@indoorplaygroundsintl.com>; 'Kara DiPietro' <k.dipietro@hmcincorporated.com>; 'Mary

Carleton <mary@capjets.com>; Sean Whalen <seanwhalen71@gmail.com>; James Bowen <tbowen20@hotmail.com>; Gianna Woffe <gianna@radiantimages.com>
<gianna@radiantimages.com>; Bruce Mcnider <bruce.mcnider@hotmail.com>
<bruce.mcnider@hotmail.com>; Shaun Aldredge <shaunaldredge11@gmail.com>; Michael Heller <michael.heller@mhmgroup.com>; nickstellini007@gmail.com <nickstellini007@gmail.com>;
'Amos Jones' <jones@amosjoneslawfirm.com>; bhartig528@gmail.com <bhartig528@gmail.com>;
'Julie Katz' <julie@tourmappers.com>; Joshua Speakman <jsjcspeakman1212@gmail.com>; Barry
Liner <bliner22@gmail.com> <bliner22@gmail.com>
Subject: CBSG Underwriting Questions

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your
MCA agreements:
1) Offer insurance: Yes/No ___
2) Perform credit check: Yes/No ___
3) Perform background check ___
4) Perform onsite inspection: Yes/No ___
5) Perform personal interview: Yes/No ___
6) Underwritten in less than 48 hours: Yes/No ___
7) Assign you a personal liaison: Yes/No ___
8) Conduct social media research: Yes/No ___
9) Request expense information: Yes/No ___
10) Request profit margins: Yes/No ___
11) Request AR report: Yes/No ___
12) Request debt schedule: Yes/No ___
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane



From: Heskin, Shane <sheskins@whiteandwilliams.com>
Sent: July 6, 2020 8:08 PM
Cc: Wells, Stuart <swells@whiteandwilliams.com>; Proper, Justin <ProperJ@whiteandwilliams.com>;
'Chad Frost' <chad@volunteerpharmacy.com>; Jim@nationalrx.com <jim@nationalrx.com>; Shane
Perkins <shane@legendsolar.com>; MICHAEL FOTI <mfoti26@aol.com>; Pam Fleetwood
<pam@fleetwoodservices.net>; Julie Caricato - Indoor Playgrounds Int'l
<juliec@indoorplaygroundsintl.com>; Kara DiPietro <kdipietro@hmcincorporated.com>; Mary
Carleton <mary@capjets.com>; Sean Whalen <seanwhalen71@gmail.com>; James Bowen <tbowen20@hotmail.com>;
'Gianna Woffe' <gianna@radiantimages.com>
<gianna@radiantimages.com>; 'Bruce Mcnider' <bruce.mcnider@hotmail.com>
<bruce.mcnider@hotmail.com>; 'Shaun Aldredge' <shaunaldredge11@gmail.com>; 'Michael Heller'
<michael.heller@mhmgroup.com>; 'nickstellini007@gmail.com' <nickstellini007@gmail.com>;
'Amos Jones' <jones@amosjoneslawfirm.com>; 'bhartig528@gmail.com' <bhartig528@gmail.com>;
'Julie Katz' <julie@tourmappers.com>; 'Joshua Speakman' <jsjcspeakman1212@gmail.com>; Barry
Liner <bliner22@gmail.com> <bliner22@gmail.com>
Subject: CBSG Underwriting Questions
Importance: High

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your
MCA agreements:
1) Offer insurance: Yes/No ___
2) Perform credit check: Yes/No ___
3) Perform background check ___
4) Perform onsite inspection: Yes/No ___
5) Perform personal interview: Yes/No ___
6) Underwritten in less than 48 hours: Yes/No ___
7) Assign you a personal liaison: Yes/No ___
8) Conduct social media research: Yes/No ___
9) Request expense information: Yes/No ___
10) Request profit margins: Yes/No ___
11) Request AR report: Yes/No ___
12) Request debt schedule: Yes/No ___
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T13:01:29-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T13:02:21-04:00

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From: Julie Caricato - Indoor Playgrounds Int'l <juliec@indoorplaygroundsintl.com>
Sent: Tuesday, July 7, 2020 1:01 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Cc: Wells, Stuart <swells@whiteandwilliams.com>; Proper, Justin <ProperJ@whiteandwilliams.com>;
'Chad Frost' <chad@volunteerpharmacy.com>; Jim@nationalrx.com <jim@nationalrx.com>; Shane
Perkins <shane@legendsolar.com>; MICHAEL FOTI <mfoti26@aol.com>; Pam Fleetwood
<pam@fleetwoodservices.net>; Kara DiPietro <kdipietro@hmcincorporated.com>; 'Mary Carleton'
<mary@capjets.com>; 'Sean Whalen' <seanwhalen71@gmail.com>; 'James Bowen'
<tbowen20@hotmail.com>; 'Gianna Woffe' <gianna@radiantimages.com>
<gianna@radiantimages.com>; 'Bruce Mcnider' <bruce.mcnider@hotmail.com>
<bruce.mcnider@hotmail.com>; 'Shaun Aldredge' <shaunaldredge11@gmail.com>; 'Michael Heller'
<michael.heller@mhmgroup.com>; 'nickstellini007@gmail.com' <nickstellini007@gmail.com>;
'Amos Jones' <jones@amosjoneslawfirm.com>; 'bhartig528@gmail.com' <bhartig528@gmail.com>;
'Julie Katz' <julie@tourmappers.com>; 'Joshua Speakman' <jsjcspeakman1212@gmail.com>; Barry
Liner <bliner22@gmail.com> <bliner22@gmail.com>
Subject: RE: CBSG Underwriting Questions
CAUTION: This message originated outside of the firm. Use caution when opening attachments, clicking links or
responding to requests for information.

- 1) Offer insurance: Yes/No ___ No
- 2) Perform credit check: Yes/No ___ No
- 3) Perform background check ___ No
- 4) Perform onsite inspection: Yes/No ___ No
- 5) Perform personal interview: Yes/No ___ On phone interview
- 6) Underwritten in less than 48 hours: Yes/No ___ yes
- 7) Assign you a personal liaison: Yes/No ___ no but I had a 3rd party broker
- 8) Conduct social media research: Yes/No ___ no
- 9) Request expense information: Yes/No ___ no
- 10) Request profit margins: Yes/No ___ No
- 11) Request AR report: Yes/No ___ No
- 12) Request debt schedule: Yes/No ___ No

Thanks,
Julie Caricato
866-856-9778, ext. 704
f t i n s

To: Berlin, Amie R [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07T12:16:31-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07T12:17:17-04:00

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Mary Carleton <mary@capjets.com>
Date: Tuesday, Jul 07, 2020, 12:16 PM
To: Heskin, Shane <sheskins@whiteandwilliams.com>
Subject: RE: CBSG Underwriting Questions

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- 1) Offer insurance: NO
- 2) Perform credit check: We completed an Application with a broker so they could have but don't know.
- 3) Perform background check NO
- 4) Perform onsite inspection: NO
- 5) Perform personal interview: YES
- 6) Underwritten in less than 48 hours: UNK
- 7) Assign you a personal liaison: YES BUT HE NEVER RETURNED ANY OF MY CALLS
- 8) Conduct social media research: UNK
- 9) Request expense information: NO
- 10) Request profit margins: NO
- 11) Request AR report: NO
- 12) Request debt schedule: NO

Regards,
Mary Carleton



PO Box 891326
Houston TX 77289-1326
O: 713.649.7000
C: 512.350.4538
Fax #877.665.2238
mary@capjets.com

<julie@tourmappers.com>, Joshua Speakman <jsjspeakman1212@gmail.com>, Barry Liner
(bliner22@gmail.com) <bliner22@gmail.com>

Subject: CBSG Underwriting Questions

Hi all,

This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:

- 1) Offer insurance: Yes/No ___ no
- 2) Perform credit check: Yes/No ___ dont know
- 3) Perform background check ___ dont know
- 4) Perform onsite inspection: Yes/No ___ no
- 5) Perform personal interview: Yes/No ___ i believe jp spoke to them before funding
- 6) Underwritten in less than 48 hours: Yes/No ___ cant recall
- 7) Assign you a personal liaison: Yes/No ___ no
- 8) Conduct social media research: Yes/No ___ dont know
- 9) Request expense information: Yes/No ___ no
- 10) Request profit margins: Yes/No ___ no
- 11) Request AR report: Yes/No ___ most likely but can't recall
- 12) Request debt schedule: Yes/No ___ no

Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

On Jul 7, 2020, at 1:00 PM, Julie Caricato - Indoor Playgrounds Int'l
<juliec@indoorplaygroundsinatl.com> wrote:

- 1) Offer insurance: Yes/No ___ No
- 2) Perform credit check: Yes/No ___ No
- 3) Perform background check ___ No
- 4) Perform onsite inspection: Yes/No ___ No
- 5) Perform personal interview: Yes/No ___ On phone interview
- 6) Underwritten in less than 48 hours: Yes/No ___ yes
- 7) Assign you a personal liaison: Yes/No ___ no but I had a 3rd party broker
- 8) Conduct social media research: Yes/No ___ no
- 9) Request expense information: Yes/No ___ no
- 10) Request profit margins: Yes/No ___ No
- 11) Request AR report: Yes/No ___ No
- 12) Request debt schedule: Yes/No ___ No

Thanks,
Julie Caricato
866-856-9778, ext. 704
<image001.gif>
<image002.gif>
<image003.gif>
<image004.png>

<image005.png>

<image006.jpg>

From: Heskin, Shane <heskins@whiteandwilliams.com>

Sent: July 6, 2020 8:08 PM

Cc: Wells, Stuart <Wells@whiteandwilliams.com>; Proper, Justin

<Proper@whiteandwilliams.com>; Chad Frost <chad@volunteerpharmacy.com>;

'jim@nationalrx.com' <jim@nationalrx.com>; Shane Perkins'

<shane@legendsolar.com>; 'MICHAEL FOTI' <mfoti26@aol.com>; 'Pam Fleetwood'

<pam@fleetwoodsolutions.net>; Julie Caricato - Indoor Playgrounds Int'l

<juliec@indoorplaygroundsinatl.com>; 'Kara DiPietro'

<k.dipietro@hmcincorporated.com>; 'Mary Carleton' <mary@capjets.com>; 'Sean

Whalen' <seanwhalen71@gmail.com>; 'James Bowen' <tbowen20@hotmail.com>;

'Gianna Wolffe (gianna@radiantimages.com)' <gianna@radiantimages.com>; 'Bruce

McNider (bruce.mcnider@hotmail.com)' <bruce.mcnider@hotmail.com>; 'Shaun

Allredge' <shaunallredge11@gmail.com>; 'Michael Heller'

<michael.heller@mhmsgroup.com>; 'nickstellini007@gmail.com'

To: Berlin, Amie R [BerlinA@sec.gov]

From: Heskin, Shane

Sent: 2020-07-07T13:44:43-04:00

Importance: Normal

Subject: FW: CBSG Underwriting Questions

Received: 2020-07-07T13:44:54-04:00













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From: james bowen <tbowen20@hotmail.com>

Date: Tuesday, Jul 07, 2020, 1:44 PM

To: Heskin, Shane <heskins@whiteandwilliams.com>

Subject: Re: CBSG Underwriting Questions

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1. No
2. Yes - I believe so and also passed my info to others as I received multiple calls thereafter from numerous lenders . U had tons of inquiries and approx 130 points off my credit .
3. No
- 4.no
- 5.no-on phone interview
- 6.yes
- 7.no - had 3rd party broker and he presented two deals - one good one and one bad - I emailed him and told him I didn't want the PAR loan unless I get the other loan with it . One was contingent on the other . Par loan went thru but the term loan was denied , they said due to credit but I was clearly promised both loans and never would've don't the PAR deal as it caused me many financial problems .
- 8.no
- 9.no
- 10.no
11. Yes - I think
12. No

Sent from my iPhone

<shane@whiteandwilliams.com>, 'MICHAEL FOTI' <mfoti26@aol.com>, 'Pam Fleetwood' <pam@fleetwoodsolutions.net>, 'bhartig528@gmail.com' <bhartig528@gmail.com>, 'Julie Katz' <julie@tourmappers.com>, 'Joshua Speakman' <jsjspeakman1212@gmail.com>, Barry Liner (bliner22@gmail.com) <bliner22@gmail.com>

Subject: CBSG Underwriting Questions

Importance: High

Hi all,

This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:

- 1) Offer insurance: Yes/No ___
- 2) Perform credit check: Yes/No ___
- 3) Perform background check ___
- 4) Perform onsite inspection: Yes/No ___
- 5) Perform personal interview: Yes/No ___
- 6) Underwritten in less than 48 hours: Yes/No ___
- 7) Assign you a personal liaison: Yes/No ___
- 8) Conduct social media research: Yes/No ___
- 9) Request expense information: Yes/No ___
- 10) Request profit margins: Yes/No ___
- 11) Request AR report: Yes/No ___
- 12) Request debt schedule: Yes/No ___

Please get back to me ASAP and feel free to call me with any questions.
Thanks!
-Shane

To: Berlin, Amie R. [BerlinA@sec.gov]
From: Heskin, Shane
Sent: 2020-07-07 10:03:26-04:00
Importance: Normal
Subject: FW: CBSG Underwriting Questions
Received: 2020-07-07 07:03:36-04:00

.....
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Sean Whalen <seanwhalen71@gmail.com>
Date: Tuesday, Jul 07, 2020, 12:05 AM
To: Heskin, Shane <sheskin@whiteandwilliams.com>
Subject: Re: CBSG Underwriting Questions

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Shane,

With respect to all of these questions: they had requested AR report and/or debt schedule (But not every time... typically only bank statements).

Deals were underwritten in 48 hours or less typically and I don't know if they would consider the phone call with Laforte a "personal interview".

Last, I am unaware of any personal credit check or background check (very highly doubt this), but they obviously had SSN; so may have been able to if they wanted to.

No.. to all other items.

Sean

On Jul 6, 2020, at 11:07 PM, Heskin, Shane <sheskin@whiteandwilliams.com> wrote:

Hi all,
This is urgent. Please let me know ASAP if CBSG did the following when underwriting each of your MCA agreements:
1) Offer insurance: Yes/No ____

2) Perform credit check: Yes/No ____
3) Perform background check ____
4) Perform onsite inspection: Yes/No ____
5) Perform personal interview: Yes/No ____
6) Underwritten in less than 48 hours: Yes/No ____
7) Assign you a personal liaison: Yes/No ____
8) Conduct social media research: Yes/No ____
9) Request expense information: Yes/No ____
10) Request profit margins: Yes/No ____
11) Request AR report: Yes/No ____
12) Request debt schedule: Yes/No ____
Please get back to me ASAP and feel free to call me with any questions.
Thanks!
Shane

This is proof that all the work to bring this case was outsourced by Shane Heskin, a motivated adverse party who lost in Federal court as explained by Norma Valz with these exact same client/merchants.

There is not a single attorney in America that would have his clients swear under penalty of perjury without confirming the validity of the document. No less excepting information from an adversary. The government should be held to an even higher standard than that!

Proof of Perjurious Declarations

Had the SEC bothered to follow proper protocol and request formal underwriting records from Par Funding, they would have seen that the narrative Heskin was cooking up was entirely manufactured. Instead, they rushed to court with rubber-stamped merchant statements that can now be systematically dismantled.

FOR OUR READERS WHO ARE LOOKING TO DO A DEEP DIVE ON PROVING THAT EVERYONE OF THESE MERCHANTS PERJURED THEMSELVES SEE DE-663 EXHIBITS PROVING PERJURY ON EVERY SINGLE ONE OF THESE MERCHANTS.

THE EXHIBITS WILL SHOW YOU THE SIGNED DECLARATION FROM EACH MERCHANT AND UNDERNEATH WILL SHOW THE EXHIBIT THAT THEY LIED.

THAT IN FACT THE UNDERWRITING WAS COMPLETELY THOROUGH AND ABOVE INDUSTRY STANDARDS.

Par Funding's underwriting files prove that the merchants' answers in the emails above and subsequent declarations were false and constituted perjury.

The Freedom Fighters are also mystified that Par Funding had 17,500 merchants and the only merchants they could find that made claims Par Funding's underwriting was lackluster were Shane Heskin's clients.

The sloppiness of this outsourced investigation is staggering. Subsequent interviews by defense counsel revealed that some declarants, including attorney Amos Jones, a Heskin client who signed a declaration, did not even understand the context of what they were signing or that their statements would be weaponized by Heskin and the SEC in federal court.

A Politically Motivated Takedown

Why would a powerful federal regulator abandon its strict legal guidelines, ignore standard declaration rules, and let a private actor pull the strings?

The answer lies in the targeting. The selective enforcement targeted a lifelong conservative and prominent supporter of Donald J. Trump. Rather than following the rule of law, the agency allowed a vindictive private adversary to guide its crosshairs, bypassing objective fact checking in favor of a pre-determined political outcome.

The Freedom Fighters of America will continue to expose these overreaches. This email chain from the file "Heskin Email 070720 Heskin - Berlin Merchant Declarations.pdf" is the smoking gun. It stands as a chilling reminder of what happens when weaponized federal bureaucracies violate their own governing regulations to team up with private interests, bypass due process, and dismantle American businesses.