

**UNITED STATES OF AMERICA**  
**before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-21039**

**In the Matter of**  
  
**LISA GORDON**  
  
**Respondent.**

**DECLARATION OF STEPHEN T.**  
**KAM IN SUPPORT OF DIVISION OF**  
**ENFORCEMENT’S MOTION**  
**FOR ENTRY OF DEFAULT**  
**JUDGMENT AND REMEDIAL**  
**SANCTIONS**

I, Stephen T. Kam, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice law by the State Bar of California. I am currently a Trial Counsel in the Los Angeles Regional Office of the SEC. I am the attorney assigned to this matter. I have personal knowledge of the matters set forth below, or knowledge based upon my review of the file, and, if called as a witness, could and would testify competently thereto under oath.

2. At the time these proceedings were commenced, Lisa Gordon resided in Tarzana, California. I directed that she be served by certified U.S. mail at an address in Tarzana, California in accordance with Commission Rule of Practice 141(a)(2).

3. VerdeGroup listed Gordon as its “Investor Relations” contact, and she also listed as the “Treasurer or Fiscal Agent” on VerdeGroup’s Wyoming corporate filing.

4. On March 30, 2023, I received delivery confirmation for service of the OIP. A true and correct copy of that delivery confirmation was provided to the Secretary’s Office on April 5, 2023.

5. On April 11, 2023, the Commission issued an Order to Show Cause ordering Gordon,

by April 25, 2023, to show cause why she should not be deemed to be in default and why this proceeding should not be determined against her due to her failure to file an answer and to otherwise defend this proceeding. Order, Exch Act. Rel. No. 97281 (Apr. 11, 2023). The Order further directed that if Gordon failed to file a response, the Division should file a motion for default and other relief by May 23, 2023. *Id.* Gordon did not appear or respond to the OSC.

6. On May 22, 2023, I conducted a search on the EDGAR company search database for “VerdeGroup” and found no filings related to any public offering by the company.

7. A true and correct copy of the Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Exch. Act. Rel. 88314 (March 3, 2020) is attached hereto as **Exhibit 1**.

8. A true and correct copy of the September 27, 2021 SEC Complaint in the civil action entitled *Securities and Exchange Commission v. VerdeGroup Investment Partners, et al.*, Civil Action Number 2:21-cv-07663-SB-ADS, in the United States District Court for the Central District of California is attached hereto as **Exhibit 2**.

9. A true and correct copy of the January 14, 2022 Order granting the SEC’s Motion for Default Judgment in the civil action entitled *Securities and Exchange Commission v. VerdeGroup Investment Partners, et al.*, Civil Action Number 2:21-cv-07663-SB-ADS, in the United States District Court for the Central District of California is attached hereto as **Exhibit 3**.

10. A true and correct copy of the March 11, 2022 Amended Final Judgment as to Lisa Gordon is attached hereto as **Exhibit 4**.

11. A true and correct copy of the transcript of Sylvia Bryan’s testimony on April 19, 2021 is attached hereto as **Exhibit 5**.

12. A true and correct copy of the transcript of Lee Nguyen’s testimony on April 16, 2021 is attached hereto as **Exhibit 6**.

13. A true and correct copy of a March 19, 2021 email from Lee Nguyen to SEC staff attorney Jacob Regenstreif is attached hereto as **Exhibit 7**.

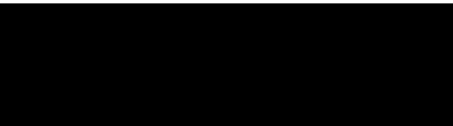
14. A true and correct copy of an April 16, 2021 email from Lee Nguyen to SEC staff attorney Jacob Regenstreif is attached hereto as **Exhibit 8**.

15. A true and correct copy of the transcript of Thomas Gaffney's testimony on July 5, 2021 is attached hereto as **Exhibit 9**.

16. A true and correct copy of a June 12, 2020 check from Tommy's Pizza Ventures Inc. to Lisa Gordon is attached hereto as **Exhibit 10**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of May, 2023, in Los Angeles, California.

A large black rectangular redaction box covering the signature of Stephen T. Kam.

Stephen T. Kam

**In the Matter of Lisa Gordon**  
Administrative Proceeding File No. 3-21039  
**SERVICE LIST**

Pursuant to Commission Rule of Practice 151 (17 C.F.R. §201.151), I certify that the attached:

**DECLARATION OF STEPHEN T. KAM IN SUPPORT OF DIVISION OF  
ENFORCEMENT'S MOTION FOR ENTRY OF DEFAULT JUDGMENT AND  
REMEDIAL SANCTIONS**

was served on May 23, 2023, upon the following parties as follows:

Vanessa Countryman, Secretary  
Securities and Exchange Commission  
100 F. Street, N.E., Mail Stop 1090  
Washington, DC 20549-1090

(By eFAP only)

Lisa Gordon  
18375 Ventura Blvd  
Tarzana, California 91356  
[REDACTED]

(By email and U.S. mail)

Lisa Gordon  
[REDACTED]  
[REDACTED]

(By U.S. mail)

Dated: May 23, 2023

[REDACTED]  
Stephen T. Kam