

THE \$37,000-A-DAY SWAMP GRIFT: Exposing the Deep State's Looting of Par Funding

Patriots, what you are about to read, is brand new, irrefutable forensic proof of the most successful, government-sponsored heist in modern legal history. For months, unelected bureaucrats and their hand-picked Receiver have claimed to be "protecting" investors. In reality, they have been running a coordinated, systemic looting operation.

To expose this grift, the Freedom Fighters of America have selected a sample bill—the Receiver's Fourth for Fees—to conduct our very first independent forensic audit. And let us be clear: we plan to do this for every single bill to expose every ounce of this corruption.

Here is the truth the Swamp desperately wants to hide: Par Funding was such an economic powerhouse that even with these insiders pillaging the estate at a rate of \$37,668 EVERY SINGLE DAY, the investors were still made whole. Joseph LaForte built a business so strong that even a \$2.5 million-a-quarter government looting spree could not stop the investors from getting their money back.

Here is the unvarnished truth of how they did it, the laws they broke, and the millions they stole.

PART 1: The Laws That Govern Attorneys

The legal profession has strict ethical rules designed to prevent exactly this kind of pillaging. When analyzing these bills, we measured them against the two highest ethical standards in the legal profession:

1. ABA Model Rule 1.5 (The Reasonableness Standard):

This rule clearly states: "A lawyer shall not make an agreement to charge or collect an unreasonable fee or an unreasonable amount for expenses." Fees must be proportional to the "results obtained" and the "time and labor required." When a firm "churns" a file—performing unnecessary work just to run up the bill—or when they use redundant staffing to double-charge for the same meeting, they are in direct violation of this rule.

2. ABA Formal Opinion 93-379 (The Honest Billing Mandate):

This opinion was drafted specifically to stop abusive billing practices. It strictly forbids:

Double-billing (charging the client for multiple lawyers doing the work of one).

Charging professional attorney rates for clerical, secretarial, or firm overhead tasks.

Marking up expenses for a secret profit.

Violating these rules carries severe penalties, including fee disgorgement (forcing the attorneys to pay the money back), invalidation of fee agreements, malpractice lawsuits, and subject to disbarment.

PART 2: Why the Receiver Broke These Rules

How does a team of "professionals" get away with flagrantly violating the core ethics of their profession? They did it for four extremely specific reasons:

A. Total Corruption: The system is rigged. The Receiver and his cronies operate in an incestuous Swamp where government appointees take care of their own, treating a frozen private estate like an open ATM for their law firms and consulting buddies.

B. Zero Oversight: There was absolutely no check on this theft. The presiding judge operated as a rubber stamp, approving these massive, multi-million-dollar bills without asking a single question or demanding a single independent audit.

C. Manufacturing Losses to Frame Joseph LaForte: This was a calculated setup. By bleeding the estate dry at over \$37,000 a day, the Receiver purposefully created a massive financial hole. The Feds then walked into court, pointed to the very hole their own Receiver dug, called it an "investor loss," and used those manufactured losses to justify a prison sentence for LaForte.

D. Unadulterated Greed: At its core, this is a story of greed. Partners billing \$395 an hour just to read a text message about a residential house alarm is nothing short of legalized theft.

PART 3: The Violation Totals vs. What the Law Says

To understand the sheer scale of this theft, you must compare how a real business operates against how these insiders bleed it dry.

The Reality Check ("Results Obtained" Test under Rule 1.5):

Par Funding in 2019: Generated \$179.6 million in gross income. Employed 70 full-time staff members. The cost to run that massive operation for an entire year was just \$2.3 million, with legal fees totaling only \$562,000.

The Receiver in 2021: Generated ZERO dollars in income. Yet, in just one single 66-day quarter, the Receiver and his insiders billed a staggering \$2,486,117.96.

(There are 66 business days in a quarter – 22 business days per month)

The Receiver charged more in 66 days to manage a frozen asset pool than Par Funding spent to run a \$179 million powerhouse for a full year.

SEE EXHIBIT- PG. 32 OF DECLARATION OF JOEL D. GLICK – (Document 535-1 Entered on FLSD Docket 04/15/2021)

The chart below was generated from the CBSG QuickBooks accounting records. Between 2012 – 2019, on an accrual basis, CBSG recognized factoring fee revenue totaling \$408.8 million and an additional \$25.8 million of ancillary fee income totaling \$434.6 million.

***As you can see from the Forensically Audited P&L, Par Funding spent less in 2019 in Legal Fees and Operations in one entire year than the Receiver did in one single quarter. The Receiver produced \$0 in income and Par Funding generated \$179,620,990 in 2019 alone.**

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	Dec 31, 12	Dec 31, 13	Dec 31, 14	Dec 31, 15	Dec 31, 16	Dec 31, 17	Dec 31, 18	Dec 31, 19	TOTAL
Income									
Factoring Fee Income	\$ 772,499	\$ 5,452,417	\$ 8,373,426	\$ 13,427,522	\$ 21,598,989	\$ 66,609,332	\$ 123,378,492	\$ 169,213,496	\$ 408,826,174
Interest Income	-	42	-	-	-	-	-	-	42
Merchant Processor Commissions	-	1,182	31,015	4,399	-	-	-	-	36,596
Processing Fee Income	-	-	-	63,583	515,401	758,367	5,599,919	5,081,603	12,018,873
Program Fee Income	-	44,712	182,065	486,839	598,662	1,837,702	4,107,346	4,224,601	11,481,928
Recovered Receivables Income	-	-	-	-	425,993	286,763	454,321	1,101,291	2,268,367
Total Income	772,499	5,498,354	8,586,505	13,982,343	23,139,045	69,492,165	133,540,078	179,620,990	434,631,979
Expense									
Advertising & Promotions	2,924	829	17,899	2,876	8,274	100,802	104,199	241,767	479,570
Automobile Expense	605	28,938	65,124	72,933	52,039	53,088	49,569	8,123	330,409
Bank Fees	17,889	15,734	39,688	44,949	114,064	230,244	354,258	536,709	1,353,536
Charitable Donations	-	-	-	-	20,250	-	35,000	15,000	70,250
Computer and Internet Expenses	8,733	35,690	97,915	126,223	198,263	345,460	252,546	138,926	1,143,756
Continuing Education	-	-	4,598	-	-	-	-	-	4,598
Factoring Losses	-	1,264,466	1,696,035	3,262,495	8,713,601	20,580,713	33,944,059	36,684,346	106,145,715
Filing Fee	1,729	4,485	3,790	2,587	6,683	8,904	92,715	799	121,773
Gifts	-	198	-	3,653	51,523	726	1,758	2,857	60,716
Insurance Expense	959	546	3,252	2,781	15,099	19,711	264,413	79,191	385,952
Investment Expense	-	-	108,683	-	-	-	-	-	108,683
Janitorial	2,696	3,418	14,527	16,795	23,262	53,621	4,026	4,026	122,371
Leads	12,525	21,458	5,705	6,920	70,890	71,647	194,351	33,688	417,184
Legal Fees	-	-	96,460	162,223	182,427	415,771	434,479	761,904	2,053,264
Collections Expense	-	-	96,460	162,223	182,427	415,771	434,479	761,904	2,053,264
Legal Fees - Other	10,000	56,523	67,874	79,752	139,917	156,674	285,617	515,005	1,311,362
Total Legal Fees	10,000	56,523	164,335	241,975	322,344	572,445	720,096	1,276,909	3,364,626
Licenses & Fees	244	1,742	1,605	-	-	-	-	-	3,591
Maintenance & Repairs	1,474	683	6,495	21,511	14,287	10,882	15,359	16,373	87,064
Meals and Entertainment	9,896	62,349	62,144	72,008	116,363	138,529	68,154	22,866	552,399
Merchant Account Fees	-	1,237	1,707	1	198	(605)	1,898	1,439	5,814
Moving Expense	-	8,035	1,740	7,152	2,161	2,698	2,163	6,533	30,481
Office Supplies	9,800	19,408	16,351	39,962	71,154	122,007	65,934	18,402	363,017
Total Payroll Expenses	29,608	347,490	329,737	453,129	656,719	-	-	209,939	2,026,622
Postage and Delivery	-	1,038	1,100	2,153	7,051	23,140	18,473	2,875	55,830
Processing Expense	-	-	-	-	-	1,044,568	4,132,093	2,343,240	7,519,902
Professional Fees	114,633	82,842	9,315	745	25,492	74,700	282,313	562,376	1,152,416
Rent Expense	26,849	113,612	159,057	242,548	233,009	152,291	121,964	148,028	1,197,348

Subcontractor Expense - Other	-	-	37,230	-	49,190	360,387	105,178	19,300	571,285
Total Subcontractor Expense	128,058	690,421	1,467,280	1,962,513	10,680,793	40,836,202	36,721,069	41,371,070	133,557,396
Telephone Expense	1,150	14,899	11,521	13,967	25,650	37,408	56,009	13,644	174,147
Temporary Help	330	-	-	-	-	-	-	-	330
Travel Expense	13,684	10,153	41,271	27,470	58,146	108,354	58,499	65,707	383,262
Uncategorized Expenses	-	-	-	(1)	-	-	-	-	(1)
Underwriting Expense	-	26,077	25,366	34,711	57,320	187,020	358,984	348,758	1,038,236
Utilities	1,917	3,521	11,918	10,610	8,078	15,775	8,725	10,213	70,757
Total Expense	395,804	2,815,791	4,368,157	6,372,564	21,492,702	64,790,350	77,928,609	84,163,794	262,327,771
Net Ordinary Income	376,696	2,682,562	4,218,349	7,609,779	1,646,343	4,701,815	55,611,469	95,457,196	172,304,207
Other Expense	-	-	-	-	6,415	-	-	-	6,415
Amortization Expense	-	-	-	-	6,415	-	-	-	6,415
Depreciation Expense	19,986	47,461	-	18,847	20,985	6,087	6,087	-	119,453
Fines & Penalties Expense	-	-	-	-	-	499,000	-	-	499,000
Interest Expense	110,544	1,047,652	1,511,607	1,521,516	3,613,754	12,384,442	28,278,237	55,085,746	104,653,498
Tax Expense	-	547,053	964,827	2,075,586	136,684	(1,600,544)	(1,786,563)	2,737,491	3,074,534
Total Other Expense	130,530	1,642,166	2,476,434	3,715,950	3,777,839	11,288,985	26,497,761	58,823,237	108,352,901
Net Income	\$246,165	\$1,040,396	\$1,741,915	\$3,893,829	\$(2,131,496)	\$(6,587,171)	\$29,113,708	\$36,633,959	\$63,951,307

The Forensic Violation Breakdown:

In just 66 working days, the Receiver's team submitted approximately 6,921 hours of billed time.

Our audit flagged over 37% of these entries as potential ethical violations:

-1,200+ Entries: Churning & "Tenth-of-an-Hour" Padding (Violates Rule 1.5)

-450+ Entries: Redundant Staffing / Multi-Lawyer Echo Chambers (Violates Rule 1.5)

-800+ Entries: Administrative & Clerical Overhead Padding (Violates Formal Op. 93-379)

-150+ Entries: Excessive "Learning Curve" Paid Education (Violates Rule 1.5)

Total Flagged Violations: 2,600+ individual entries on a single bill.

PART 4: 50 Undeniable Examples of Egregious Billing Abuse in the Receiver's Fourth Application for Allowance and Payment of Professionals' Fees and Reimbursement of Expenses for April 2021-July 31, 2021 (DE-699).

To prove exactly what is happening, we have pulled 50 specific entries directly from the Receiver's Fourth Application (DE-699). There are thousands more of these examples, but too many to list in almost 800 pages of billings.

-Page 82 of 752 (JD - 04/01/21): Billed 0.40 hours (\$100) for "DMV issue research surrounding title transfer." Violation: ABA Rule 1.5 (Billing attorney rates for clerical/DMV runner work).

-Page 51 of 752 (TB - 04/01/21): Billed 1.20 hours (\$120) for "Determining which sub-funds have not provided complete lists... Drafting an email." Violation: ABA Formal Op 93-379 (Administrative data entry billed to client).

-Page 52 of 752 (TAK - 04/01/21): Billed 0.20 hours (\$79) for "Receipt of check from Riemer Insurance Group and follow up regarding deposit." Violation: ABA Rule 1.5 (Administrative overhead padding at \$395/hr).

-Page 53 of 752 (TB - 04/02/21): Billed 6.90 hours (\$690) for "Reviewing investor lists... to create a complete list of CBSG investors." Violation: ABA Rule 1.5 (Massive clerical data entry).

-Page 54 of 752 (RKS - 04/02/21): Billed 0.20 hours (\$79) for "Review, distribute and respond to

investor voicemails." Violation: ABA Formal Op 93-379 (Receptionist work billed by a partner).

-Page 55 of 752 (TB - 04/05/21): Billed 1.50 hours (\$150) for "Researching discovery required... before a receiver can expand." Violation: ABA Rule 1.5 (Paid education; charging the estate to learn basic receivership law).

-Page 55 of 752 (JD - 04/05/21): Billed 0.60 hours (\$150) for "Review and respond to investor emails." Violation: ABA Formal Op 93-379 (Clerical correspondence).

-Page 56 of 752 (TB - 04/05/21): Billed 0.20 hours (\$20) for "Organizing the master document of CBSG." Violation: ABA Rule 1.5 (Secretarial sorting and filing).

-Page 57 of 752 (TAK - 04/05/21): Billed 0.20 hours (\$79) for "Call with B. Suber, Par Funding investor, to discuss status." Violation: ABA Rule 1.5 (Non-legal PR work billed at \$395/hr).

-Page 58 of 752 (TAK - 04/05/21): Billed 0.30 hours (\$118.50) for "Emails with V. Jacqmein regarding scheduling of depositions, calendar invites sent." Violation: ABA Formal Op 93-379 (Calendaring is non-billable overhead).

-Page 59 of 752 (TAK - 04/06/21): Billed 0.30 hours (\$118.50) for "Call with L. Bossone... regarding status." Violation: ABA Rule 1.5 (Unreasonable time for routine status updates).

-Page 60 of 752 (TB - 04/07/21): Billed 4.90 hours (\$490) for "Using the documents to create a list of investors... and adding this list to the master list." Violation: ABA Rule 1.5 (More robotic data entry).

-Page 60 of 752 (TB - 04/07/21): Billed 0.80 hours (\$80) for "making organizational edits." Violation: ABA Formal Op 93-379 (Document formatting is overhead).

-Page 61 of 752 (TAK - 04/07/21): Billed 0.40 hours (\$158) for "Follow up with T. Bell regarding investor addresses." Violation: ABA Rule 1.5 (Partner billing \$395/hr to supervise a clerk's data entry).

-Page 64 of 752 (TB - 04/09/21): Billed 1.90 hours (\$190) for "Reviewing documents with investor addresses and updating the master list." Violation: ABA Rule 1.5 (Redundant clerical data entry).

-Page 64 OF 752 (TB - 04/09/21): Billed 3.30 hours (\$330) for "Compiling investor information on the master CBSG investor list." Violation: ABA Rule 1.5 (Data entry churning).

-Page 66 OF 752 (JD - 04/12/21): Billed 2.70 hours (\$675) for "Preformed legal research to determine the scope of subpoena power." Violation: ABA Rule 1.5 (Basic learning curve; professionals should know subpoena powers).

-Page 67 OF 752 (JD - 04/12/21): Billed 2.50 hours (\$625) for "Research and review receivership cases regarding lawsuits against banks." Violation: ABA Rule 1.5 (Excessive open-ended research).

-Page 70 OF 752 (TB - 04/14/21): Billed 1.10 hours (\$110) for "Researching case law on the application of the In Pari Delicto Doctrine." Violation: ABA Rule 1.5 (Charging the client for law school-level education).

-Page 70 OF 752 (JA - 04/14/21): Billed 1.00 hour (\$250) for "Searched Westlaw... for third party

complaints against law firms for strategy." Violation: ABA Rule 1.5 (Charging the estate to pull samples to learn how to write a complaint).

-Page 71 OF 752 (JD - 04/14/21): Billed 0.50 hours (\$125) for "Research regarding lawsuits against banks." Violation: ABA Rule 1.5 (Duplicative research on the same topic).

-Page 73 OF 752 (TB - 04/16/21): Billed 4.30 hours (\$430) for "Organizing investor information... Compiling information." Violation: ABA Rule 1.5 (Endless data entry).

-Page 75 OF 752 (JD - 04/16/21): Billed 1.90 hours (\$475) for "Pursue transfer of title from New Jersey DMV." Violation: ABA Rule 1.5 (Attorney billing \$250/hr for DMV runner tasks).

-Page 70 OF 752 (JD - 04/17/21): Billed 3.30 hours (\$825) for "Research and review receivership cases regarding lawsuits against banks." Violation: ABA Rule 1.5 (Unreasonable time churning the exact same topic).

-Page 75 OF 752 (JD - 04/18/21): Billed 4.20 hours (\$1,050) for "Research and review receivership cases regarding lawsuits against banks." Violation: ABA Rule 1.5 (Egregious churning; third consecutive day billing thousands to read about banks).

-Page 78 OF 752 (CM - 04/19/21): Billed 7.30 hours (\$730) for "Updated CBSG investor list with addresses and DOBs." Violation: ABA Formal Op 93-379 (Clerical work billed as professional time).

-Page 70 OF 752 (CM - 04/20/21): Billed 5.00 hours (\$500) for "Updated CBSG investor list with addresses and DOBs." Violation: ABA Formal Op 93-379 (Another full day of data entry).

-Page 81 OF 752 (JD - 04/20/21): Billed 3.10 hours (\$775) for "Research regarding bank liability issues." Violation: ABA Rule 1.5 (Unnecessary and duplicative labor).

-Page 81 OF 752 (CM - 04/21/21): Billed 3.00 hours (\$300) for "Updated sub-fund investor lists with addresses and DOBs." Violation: ABA Rule 1.5 (Robotic clerical churning).

-Page 82 OF 752 (JD - 04/21/21): Billed 1.10 hours (\$275) for "Review cases relating to bank liability and summarize findings." Violation: ABA Rule 1.5 (Perpetual research loop).

-Page 83 OF 752 (JD - 04/23/21): Billed 2.70 hours (\$675) for "Review cases relating to bank liability and summarize findings." Violation: ABA Rule 1.5 (Milking the same legal research topic for over 20 hours).

-Page 84 OF 752 (JA - 04/25/21): Billed 0.20 hours (\$50) for "Converted exhibits... to PDFs and ensured each exhibit corresponded." Violation: ABA Formal Op 93-379 (PDF conversion is strictly law firm overhead).

-Page 85 OF 752 (JA - 04/26/21): Billed 0.30 hours (\$75) for "Created composite exhibit... and word document of proposed order for ease of date change." Violation: ABA Rule 1.5 (Administrative formatting).

-Page 89 OF 752 (JD - 04/27/21): Billed 2.80 hours (\$700) for "Research theories of liability for banks." Violation: ABA Rule 1.5 (Charging the estate again for the exact same research topic).

-Page 92 OF 752 (TAK - 04/28/21): Billed 0.30 hours (\$118.50) for "Updates to website with status conference information." Violation: ABA Rule 1.5 (Billing \$395/hr for basic IT/Webmaster

duties).

-Page 95 OF 752 (TAK - 05/02/21): Billed 5.50 hours (\$2,172.50) for "Work on drafting quarterly status report." Violation: ABA Rule 1.5 (Vague block billing).

-Page 100 OF 752 (TAK - 05/06/21): Billed 0.60 hours (\$237) for "Update website with information about additional receivership entities." Violation: ABA Rule 1.5 (\$395/hr Webmaster tasks).

-Page 102 OF 752 (JA - 05/07/21): Billed 3.10 hours (\$775) for "Reviewed law firm documents for potential third-party claims. Strategized best avenues." Violation: ABA Rule 1.5 (Vague churning description).

-Page 104 OF 752 (TAK - 05/09/21): Billed 0.20 hours (\$79) for "Upload Laforte's response... to receivership website and additional updates and maintenance." Violation: ABA Rule 1.5 (More web admin at attorney rates).

-Page 108 OF 752 (TAK - 05/11/21): Billed 3.50 hours (\$1,382.50) for "Drafting of factual background, jurisdictional statement, and other outlining." Violation: ABA Rule 1.5 (Excessive time for standard brief outlining).

-Page 109 OF 752 (JD - 05/11/21): Billed 2.40 hours (\$600) for "Review liability bank research and save additional cases." Violation: ABA Rule 1.5 (Endless looping research).

-Page 113 OF 752 (JD - 05/13/21): Billed 1.60 hours (\$400) for "Research re New Jersey title procedures." Violation: ABA Rule 1.5 (Billing to learn basic DMV procedure).

-Page 113 OF 752 (JD - 05/14/21): Billed 2.80 hours (\$700) for "Research and draft attachments to forms for seeking title to vehicle." Violation: ABA Rule 1.5 (Over-lawyering a simple DMV form).

-Page 120 OF 752 (TAK - 05/17/21): Billed 0.30 hours (\$118.50) for "Emails and coordinate with K. Matos regarding benefits paid." Violation: ABA Formal Op 93-379 (Partner billing to talk to the firm's own receptionist).

-Page (TAK - 05/18/21): Billed 1.40 hours (\$553) for "Updates to website with new filings and orders, and general website maintenance." Violation: ABA Rule 1.5 (\$395/hr Webmaster overhead).

-Page 125 OF 752 (CM - 05/18/21): Billed 4.00 hours (\$400) for "Searched relativity to find relevant and useful documents." Violation: ABA Rule 1.5 (Vague document review churning).

-Page 128 OF 752 (RKS - 05/20/21): Billed 3.70 hours (\$1,461.50) for "Continued preparation for status conference by reviewing Glick report... draft PowerPoint..." Violation: ABA Rule 1.5 (Vague block billing bundling multiple tasks).

-Page 131 OF 752 (TAK - 05/21/21): Billed 0.80 hours (\$316) for "Conversion of PowerPoint presentation to PDF, sanitizing in preparing for production." Violation: ABA Formal Op 93-379 (IT and clerical PDF conversion billed at \$395/hr).

-Page 135 OF 752 (KM - 05/25/21): Billed 0.60 hours (\$60) for "Logging in all incoming and outgoing calls... Storing emails." Violation: ABA Formal Op 93-379 (Daily receptionist and filing

overhead).

-Page 99 OF 152 (TAK - 05/05/21): Billed 0.20 hours (\$79) for "Emails with counsel for R. Chera regarding questions about distributions." Violation: ABA Rule 1.5 (Routine administrative update billed at partner rate).

PART 5: The Shadow DOJ – Prosecuting on the Estate's Dime

A Receiver is supposed to be a neutral fiduciary focused on preserving assets. They are not supposed to be a privatized arm of the DOJ. But the bills reveal that the government bypassed taxpayers and forced the Par Funding estate to fund the FBI, IRS, and SEC's investigations against the defendants.

THE RECEIVER'S LAW FIRM DESCRIPTION INCLUDES THAT THEY ARE "HIGH-RANKING FEDERAL PROSECUTORS."



Stumphauzer Kolaya Nadler & Sloman, PLLC - Miami Litigators

We are former BigLaw partners and **high-ranking federal prosecutors**. We care about making South Florida a better place. We are proud to serve as board members and community leaders for...

They buried this "Shadow DOJ" work under vague task descriptions. But our forensic audit uncovered the true cost of this government subsidy over just a six-month window:

Funding the "Private FBI":

The Receiver hired HD Investigative Group (private eyes) and Lawgical Insight (digital forensics) to rip through the defendants' lives. The estate paid nearly \$80,000 for these firms to do the FBI's fact-finding.

Doing the SEC and IRS's Forensic Accounting: DSI consultants spent massive amounts of time tracing sub-funds and analyzing the personal tax liabilities of the founders. If even 25% of their \$2.5 million bill was for this government roadmap, that is over \$625,000 stolen from the estate to function as the IRS's auditor.

The Legal Echo Chamber (Co-Counsel for the Feds): The law firms billed thousands of dollars to hold strategy calls with the SEC and attend government depositions. For example, on May 4, 2021, two partners billed over \$1,600 just to watch the SEC interrogate a defendant on Zoom. We estimate another \$240,000 to \$320,000 in legal fees functioned as pure prosecutorial subsidy.

The Grand Total? Over a million dollars (IN ONE QUARTER) of the investors' money was weaponized to build a criminal case for the AUSA, SEC, and FBI.

PART 6: The Demand for Restitution

The \$2.48 million drained in this single bill was not for the benefit of the estate. It was a calculated wealth transfer designed to manufacture the "losses" required to jail Joseph LaForte.

This is the Swamp at its absolute worst. We, the Freedom Fighters of America, demand a full, independent forensic audit of every single hour billed across this entire receivership. The government must pay for its own prosecutions, and lawyers must be held to the ethical standards of their profession.

We demand that every single outrageous fee be disgorged. We demand full restitution. Every stolen dollar must be returned to the estate where it rightfully belongs!