

Government Overreach: The Unlawful Raid on 568 Ferndale Lane

The Fourth Amendment of the U.S. Constitution guarantees that citizens are secure in their homes against unreasonable searches. Yet, in July 2020, armed federal agents raided a private family residence—traumatizing a woman who was home alone—under the guise of searching for corporate documents.

The defense's motion to suppress exposes this raid for what it was: an illegal fishing expedition built on manipulated facts, missing legal standards, and blatant government overreach. Here are the facts the government does not want you to focus on:

1. The "Missing Link" (No Legal Nexus)

By law, the government cannot raid a home just because a business owner lives there. They must prove a "nexus"—a direct, factual link showing that evidence of a crime is actually hidden inside the house. The FBI completely failed to do this. CBSG (Par Funding) was a highly professional, multi-million-dollar operation with three dedicated commercial offices, outside legal counsel, and independent accountants.

As the motion states perfectly: *"The Affiant offers no evidence to suggest that Mr. LaForte or anyone else conducted business at the Residence or that any records relating to the business activities of CBSG were sent to or maintained at the Residence."* There was zero logical reason to suggest the core operational documents of this massive company were hidden in a family living room.

2. The Absurd "Junk Mail" Justification

To manufacture a reason to get inside the house, the FBI presented "evidence" that borders on the ridiculous. They cited credit card deliveries—specifically, a few pieces of American Express mail addressed to the home over a span of three years—as "proof" that the house was a central corporate hub.

The defense calls out this absurdity directly: *"No amount of mental gymnastics can contort the mailing of a credit card from American Express... into a shipment of documents concerning the business activities."* The motion drives the point home: *"A delivery from American Express to an individual in the name of a particular company is not a mailing that contains evidence about the business activities of that company, let alone evidence about the criminal offenses involving the allegations in the Affidavit."*

3. The Bait-and-Switch Warrant

Because the FBI knew they did not have the evidence to support raiding the home for business documents, they used the "junk mail" excuse just to get their foot in the door. Once inside the

home, they strayed entirely outside the boundaries of their original search warrant. They stumbled across cash and legally owned firearms, paused the operation, and scrambled to file a **second, supplemental warrant** to seize items they never had the right to look for in the first place.

***(The FBI rummaged through the house for 16 hours!)**

As the defense reminds the court, citing established constitutional law: *"One's home is sacrosanct, and unreasonable government intrusion into the home is 'the chief evil against which the wording of the Fourth Amendment is directed.'"* If the first warrant is built on lies, everything seized after it is "fruit of the poisonous tree" and must be thrown out.

4. The FBI Cannot Hide Behind "Good Faith"

When the government gets caught conducting an illegal search, their favorite excuse is the "Good Faith Exception"—claiming the agents were just following a judge's orders and made an honest mistake. The motion destroys this defense. Relying on established federal case law, the defense argues that the FBI's affidavit was so incredibly devoid of actual evidence that no reasonable, well-trained officer could have legally believed the raid was justified.

To quote the motion quoting the courts: *"'Good faith is not a magic lamp for police officers to rub whenever they find themselves in trouble.' ... No objectively reasonable police officer could believe that, despite the magistrate's authorization, the law did not prohibit a search..."* You cannot pack a warrant with irrelevant, lurid accusations to make up for a complete lack of facts.

**** (JOHN MURRAY BROUGHT IT TO THE COURT SO HOW CAN THEY CLAIM THEY WERE FOLLOWING JUDGE'S ORDERS AND IT WAS AN "HONEST MISTAKE"??)**

The Bottom Line:

This was not a search for justice; it was an exercise in intimidation. The government routinely relies on the fact that the public will not read the actual warrants. When you look at the facts—the fabricated "nexus," the reliance on junk mail, and the bait-and-switch tactics—it becomes clear that this raid was an illegal, terrifying intrusion into a private family home.