

THE BAIT-AND-SWITCH:

How the SEC Turned a "Simple Disclosures Case" into a \$314 Million Heist!

We've been told for years that Par Funding was a "massive fraud." But if you look at the actual court transcripts—the words coming out of the mouth of SEC Senior Trial Counsel Amie Riggle Berlin—a very different story emerges.

At the start, the SEC didn't call this a criminal empire. They called it a "Simple Disclosures Case."

THE "SIMPLE" LIE

Amie Riggle Berlin and the SEC stood before a Federal Judge and argued that one of the main reasons they needed to seize the company was because Joseph LaForte hadn't "properly disclosed" his past. They claimed he was hiding. They claimed he was a ghost.

But let's look at the EXHIBITS that the SEC hoped you'd never see:

EXHIBIT A: The Forbes Bylines

The SEC claimed LaForte used the name "Joe Mack" to stay in the shadows. FALSE. Joseph LaForte was a frequent contributor to Forbes and other major business publications. He wasn't writing under an alias. He was writing as Joseph LaForte.

All the links to his articles and publications were in the signature of his Par Funding email.

Here are a few examples of what a simple Google search would have shown if anyone wanted to know who Joseph LaForte was:

[Joseph Laforte's Biography _ Muck Rack.pdf](#)



Joseph Laforte

📍 Miami, Philadelphia

As seen in: Forbes, Yahoo Finance, Patch, Thrive Global, Business.com, PYMNTS.com, Business Matters Magazine, Swagger Magazine, StartupNation, citybizlist and more

Covers: small business, finance, entrepreneurship, budget and financing for small business, business expansion and sales coaching.

Joseph Laforte #entrepreneur, VP ParFunding Small #Business Finance Passionate about all things #SmallBusiness, Forbes Contributor josephlaforte.com

[← BACK TO JOSEPH LAFORTE'S PROFILE](#)

JOSEPH LAFORTE'S BIOGRAPHY

In 1992, Joseph Laforte left his position playing college ball for Rollins and signed a contract with the Seattle Mariners. As a switch-hitting catcher, he had the opportunity to develop skills on the baseball diamond that enabled him to see the path to professional success.

He couldn't have imagined where it would take him.

Joseph laforte has over 20 years experience in the small business finance industry, while Joseph couldn't be further from the baseball field—but he continues to use a highly competitive nature and get it done attitude to make things better for many struggling small business owners. While focusing on small business cash flow solutions for small businesses, Joe also works hand in hand with business owners to guide them through expansion and growth.

Joseph's stellar reputation isn't by chance. Not only is he dedicated to charity, making regular contributions to both charities close to his heart, including

<https://muckrack.com/joseph-laforte/bio>

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[Tips for Knowing Your Limits as A Small Business Owner Letting Go Can Help You Grow- Forbes _ Joseph Laforte - Academia.edu.pdf](#)

10 Tips for Knowing Your Limits as A Small Business Owner: Letting Go Can Help You Grow



[Joseph LaForte](#) Forbes Councils Member
[Forbes Business Development Council](#)

By Joseph LaForte

Joseph LaForte, the Director of Sales at [Par Funding](#), has generated over \$1 billion in sales for clients in his 20-year career.



https://www.academia.edu/40908200/Tips_for_Knowing_Your_Limits_as_A_Small_Business_Owner_Letting_Go_Can_Help_You_Grow_Forbes

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[2020.5.11 Businessman Joseph Laforte Advice to Entrepreneurs During Covid - West Palm Beach, FL Patch.pdf](#)

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[Neighbor News](#)

Businessman Joseph Laforte Advice to Entrepreneurs During Covid

How small business owners and entrepreneurs can continue to continue to lead, and forge ahead, during COVID and times of major disruption.



Joseph Laforte, Neighbor

Posted Mon, May 11, 2020 at 5:33 pm ET Updated Tue, May 12, 2020 at 1:59 pm ET

[Reply \(1\)](#)



10/24/22, 11:45 AM
Joseph laforte

Businessman Joseph Laforte Advice to Entrepreneurs During Covid | West Palm Beach, FL Patch

[Joseph Laforte](#) is one of the small business industry's most distinguished and

ADVERTISEMENT

accomplished leaders. Joseph has led Par Funding to unprecedented growth while contributing to the economic development of hundreds of business.

Anyone could simply click the “JOSEPH LAFORTE” Hyperlink in the article that went to a URL page ([WiseIntro Portfolio](#)) dedicated to HIM....including his full name, Photo, Phone Number Address, Website, and Email.

LOOK!



Can you imagine trying to hide your identity this way!

[2020.5.16 Joseph Laforte on Small Business Growth During the Covid19 Pandemic - Foreign Policy.pdf](#)

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Joseph Laforte on Small Business Growth During the Covid19 Pandemic

MAY 16, 2020 - BUSINESS

[2020.5.18 How Small Businesses Can Navigate the COVID19 Pandemic- Thrive Global.pdf](#)



 THRIVE



COMMUNITY

How Small Businesses Can Navigate the COVID19 Pandemic

Red sign hanging at the glass door of a shop saying "Closed due to coronavirus". Many small business owners are getting hit hard by the realities of the coronavirus pandemic. Shutdowns, social distancing measures, and even customers' fears may have changed the way you handle many of your business operations. Here's the good news: your [...]

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By [Joseph Laforte](#), Business Entrepreneur at Par Funding

[2020.6.3 Joseph LaForte_Safely Reopening Your Business After COVID-19.pdf](#)

Joseph LaForte: Safely Reopening Your Business After Covid-19

By Editor · 06/03/2020



[2020.6.5 Joseph Laforte Of Par Funding Discusses How Business Can Evolve During Times of Crisis .pdf](#)

 **BIG NEWS NETWORK**

Finance (/arc)

Joseph Laforte Of Par Funding Discusses How Business Can Evolve During Times of Crisis.

 Joseph Laforte Of Par Funding Discusses How Business Can Evolve During Times of Crisis.

MIAMI, FL / ACCESSWIRE / June 4, 2020 / Joseph LaForte at Par Funding

(<https://pr.report/Tdb1VYih>), has released a look at how industries can continue to evolve in times of crisis: a comprehensive look at how the COVID-19 pandemic has impacted many industries and what businesses must do in order to evolve, support their communities, and continue to do vital business in the midst of a crisis situation.

THE TRUTH: You don't hide your identity by putting your real name on the byline of the world's most famous financial magazine. The SEC knew this, but they lied to the court to get their "Receiver" in the door.

EXHIBIT B: The 2018 "Full Disclosure" Letter

In 2018—two full years before the SEC raid—a Bloomberg article attacked LaForte. Did he hide? No.

Instead, he hired the Law Firm Testa Heck and sent a formal disclosure letter to his investors. He told them about his past. He told them about his history.

AND HERE IS THE SMOKING GUN: Par Funding's notes were 12-month terms. Every single investor got that 2018 letter and was PAID IN FULL in 2019. They had their money back. They knew the "secrets." And what did they do? THEY REINVESTED!

THE ACTUAL LETTER SENT TO PAR FUNDING INVESTORS:

TESTA HECK TESTA & WHITE, P.A.

Counselors at Law

MICHAEL L. TESTA
CERTIFIED CIVIL TRIAL ATTORNEY
CERTIFIED CRIMINAL TRIAL ATTORNEY
TODD W. HECK, LL.M.
MASTERS DEGREE IN TAXATION
MEMBER NJ, NY AND PA BAR
MICHAEL L. TESTA, JR., LL.M.
MASTERS DEGREE IN TRIAL ADVOCACY
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December 21, 2018

ROBERT J. CASELLA
SHARON A. FERRUCCI
ANTHONY M. IMBESI
MEMBER NJ AND PA BAR

FRANK G. BASILE
1963-2005 (NJ Bar Admission)
FRANK J. TESTA
1949-2001 (NJ Bar Admission)
RENEE E. SCROCCA
1985-2014 (NJ Bar Admission)

Dear Friends and Associates of Par Funding:

Kindly be advised that this law firm is counsel to Complete Business Solutions Group d/b/a Par Funding. On behalf of Par Funding, thank you for the confidence and faith that you have placed in Par Funding. Thanks to you, Par Funding is a national leader in the merchant cash advance services industry, which provides the liquidity and capital needed to grow and sustain small and medium businesses.

The merchant cash advance industry has recently come under scrutiny by a certain New York-based media outlet, Bloomberg, that caters to the traditional financial markets that generally refuse to meaningfully deal with clients like those of Par Funding. Given Par Funding's size and clout in the industry, it is not surprising that Par Funding is mentioned in one of a series of articles recently published by Bloomberg about the merchant cash advance industry.

At this time, we wish to address some of statements about Par Funding set forth in the Bloomberg article. Par Funding wants to assure its investors that the Bloomberg article is half-baked, full of inaccuracies, and is seemingly just an attempt to gin-up animosity towards the merchant cash advance industry.

First, Bloomberg states that Par Funding, a licensed and lawful business-to-business funding source, charges its clients "effective annualized interest rates" that "top 250 percent." This is a false statement.

First, Bloomberg states that Par Funding, a licensed and lawful business-to-business funding source, charges its clients “effective annualized interest rates” that “top 250 percent.” This is a false statement.

Par Funding is not a bank or lender. Its chief business is providing merchant cash advances or invoice-factoring arrangements. Thus, it does not charge clients “interest,” let alone interest that “top[s] 250 percent.” Many legal opinions issued by courts around the country have confirmed that the business of Par Funding is simply not “lending.”

Rather, Par Funding purchases -- at appreciable risk -- a percentage of clients’ future receivables. If a client does not have receivables, or if the receivables are less than anticipated, Par Funding bears such risk. It does happen (infrequently) that Par Funding fails to realize any gain from the transactions it lawfully enters with clients, and is often without recourse. Truly, Par Funding’s business model is reliant upon the financial success of its clients. Further, it bears noting that Par Funding’s customer satisfaction rate is approximately 90%, and that 60% of its business is repeat business.

TESTA HECK TESTA & WHITE, P.A.

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Second, Bloomberg discusses the collection activities by a person that works for a creditor rights firm that has performed contractual services for Par Funding. Bloomberg states the false factual position that this person, Gino Gioe, was employed by Par Funding. Bloomberg further falsely suggests that Mr. Gioe is somehow related to Joseph LaForte, a manager of Par Funding.

The truth is that Mr. Gioe was never employed by Par Funding. He is not related to any owner, manager or employee of Par Funding. Mr. Gioe was never managed by Par Funding, and any activities by him were not directed by Par Funding.

It is true that from time-to-time, Par Funding must engage in collection activities. Not surprisingly, *all* financial services firms occasionally have to undertake collection efforts. Par Funding is the steward of the funds placed with it by investors. It thus has a fiduciary duty to its investors. Par Funding must safeguard the funds entrusted to it. Par Funding takes this duty seriously, which is entirely appropriate from both legal and ethical standpoints.

The employees of Par Funding are regularly trained. They comply with all applicable federal, state and local laws, including the Fair Debt Collections Practices Act. Most clients of Par Funding do not require collection activity. When such activity is required, it typically begins with phone calls and other non-obtrusive means. More often than not, delinquent accounts are resolved in such manner. Unfortunately, a small portion of Par Funding’s clients are non-responsive to telephone calls. On a few occasions, Par Funding has even been concerned that clients have accepted funds under false pretenses.

In such unusual circumstances, in-person collection activities have been needed. Par Funding has found too that in-person activities are the best way to confirm that collateral / security is in place and undisturbed. However -- and even as recognized by the Bloomberg article -- such in-person collection activities occur at a client’s place of business, and during business hours. Par Funding has also found that clients often appreciate a sit-down approach to crafting a mutually satisfactory resolution to short-term financial pressures. In any event -- and long prior to any story published by Bloomberg -- Par Funding has modified its approach to in-person collection activities. In-person appointments are now scheduled beforehand by a team of professionals fully trained and compliant with all laws.

It is interesting that the Bloomberg article specifically discusses a client of Par Funding named Radiant Images. Radiant Images is based in California and supplies cameras to the entertainment industry. The Bloomberg article falsely states that Radiant Images is owned by a person named Michael Mansouri. This simply is not true, as Radiant Images is in fact a female-owned business. Further, and more importantly, the Bloomberg article fails to disclose that Radiant Images remains to this day a client of Par Funding, still paying and taking new advances. Without Par Funding, Radiant Images would not be the prosperous company that it is today.

Third, the Bloomberg takes the false factual position that Joseph LaForte's grandfather was involved in organized criminal activities. It's simply not true. It's obvious that Bloomberg is trying

TESTA HECK TESTA & WHITE, P.A.

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to create an unfounded association between Par Funding and criminals. We further add that Joseph LaForte's grandfather died a peaceful death in 2016 at age 99, with no significant criminal history, and leaving behind a valuable real-estate portfolio that was the capstone of a lifetime of legitimate work and investment.

Fourth, Bloomberg points out that Joseph LaForte has a criminal history. Mr. LaForte acknowledges his past. As he emphasized to Bloomberg, it is just that -- the past. For nearly the past decade, Mr. LaForte has had an unblemished record and has been a driving force in Par Funding.

Fifth, Bloomberg falsely suggests that a Mr. James LaForte is employed by Par Funding. He is not; not that there would be anything inappropriate about James being employed by a company owned and operated by his family members. James denies any connection to crime, and finds such allegations against him to be highly offensive and ethnically insensitive.

In light of the malicious and hurtful nature of Bloomberg's reporting, Par Funding is weighing its options. Bloomberg has been placed on formal notice that its article is potentially libelous and constitutes a false-light invasion of privacy. As we explained to Bloomberg, the law defines libel as a written statement of fact regarding the plaintiff published by the defendant that is false and causes injury to the plaintiff. *Meloff v. N.Y. Life Ins. Co.*, 240 F.3d 138, 145 (2d Cir.2001); *see also, Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 111 L.Ed.2d 1, 110 S.Ct. 2695 (1990) (U.S. Supreme Court holding that a statement or publication containing provably false factual assertions constitutes defamation); RESTATEMENT (SECOND) OF TORTS, § 559 ("A communication is defamatory if it tends so to harm the reputation of another as to lower him in the estimation of the community or to deter third persons from associating or dealing with him").

Libel *per se* involves a false allegation that tends to injure a person in his or her trade, business, or profession. *Geraci v. Probst*, 61 A.D.3d 717, 718, 877 N.Y.S.2d 386, 388 (2009). Libel *per se* is defamatory "on its face" and does not require explanatory matter to be proven; damages are assumed. We believe that the Bloomberg story may constitute both libel and libel *per se*. Publication of incomplete and hence misleading information also gives rise to liability for defamation, since the incomplete presentation of facts can imply an actionable false assertion of fact. *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 19, 110 S.Ct. 2695, 2706, 111 L. Ed. 2d 1, 18

(1990) (incomplete facts may imply a false assertion of fact).

We further believe that the Bloomberg article may be actionable under the related legal doctrine of false light invasion of privacy, which constitutes a public statement about a person that either is false or places the person in a false light, is highly offensive to a reasonable person, and is made in reckless disregard of whether the information is false or would place the person in a false light. The statement need not be defamatory. False light invasion of privacy includes embellishment (adding false material to a true story which places the subject in a false light) and distortion (arranging otherwise true information in a way to give a false impression). RESTATEMENT (SECOND) OF TORTS § 652 E (1977); *Machleder v. Diaz*, 801 F.2d 46 (2d. Cir. 1986); *Gill v. Curtis*

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Pub. Co., 38 Cal. 2d 273 (1952); *Fellows v. National Enquirer, Inc.*, 165 Cal. App. 3d 512, 528 (1985).

No matter the course of action that we take at Par Funding, we wanted to immediately give assurances to you, Par Funding's investors. We further add that Par Funding operates in the open as a Delaware Corporate Entity, with a Corporate office in Florida. It maintains a large physical presence with offices throughout the United States. Par Funding further maintains a website, listed telephone numbers, and various social media accounts.

Finally, Par Funding wishes to remind its investors that it was established in 2011, and built on the foundation of helping small businesses gain access to funding solutions necessary for day-to-day operations and growth. Par Funding offers honest, transparent financial options through an exceptional customer support platform. Its impact continues to grow as business clients hire employees, boost productivity, and strengthen their local, regional, and national economies.

Par Funding currently has approximately \$300 million dollars in revolving accounts receivable. Underwriting and processing are handled in house. Par Funding employees over seventy people throughout four offices. Par Funding's customer satisfaction rate tops 90%, with 60% of its business being repeat business. Par Funding is financially stable and sound. All financials are fully audited and a recent audit by the IRS resulted in "no change."

In closing, we thank you for your continued confidence in Par Funding. Please do not hesitate to reach out to me or to my client if you would like to further discuss any subject.

Very truly yours,

s/ Justin R. White

JUSTIN R. WHITE
jwhite@testalawyers.com

THE TRUTH: It isn't fraud if the investors know the facts and choose to stay. The SEC isn't "protecting" these people, they are overriding their free will!

As a matter of fact, Par Funding raised an additional \$100M in 2019 after the disclosures were made and the Testa Heck letter was sent out. The investors chose to reinvest.

THE "LEGALIZED LOOTING" TIMELINE

Look at how the narrative shifted once the TRO was granted:

WHAT THEY SAID (The Bait) vs WHAT THEY DID (The Switch)

SEC Counsel Amie Riggle Berlin: "This is a simple case about failures to disclose." vs. Once the Receiver took over, they turned it into a RICO case to justify staying in power.

They weaponized the Philadelphia Inquirer, the FBI, and DOJ with false narratives and amazingly charged the estate to heighten the prosecution.

The Receiver's function is to be a neutral arbitrator when it has a fiduciary duty to the estate. Instead, they used the Philadelphia Inquirer and the FBI to take down Joe LaForte. And they used the Estate money belonging to defendants and investors to do it!

The SEC: "We must protect the investors' assets!" vs They appointed Ryan Stumphauzer, who has charged nearly \$30 MILLION in fees.

THE DEFENSE BEGGED THAT A RECEIVER WOULD BE DETRIMENTAL TO THE COMPANY. REFER TO FILING DE 148 ON 8/14/2020 "DEFENDANTS' JOINT OPPOSITION TO A PRELIMINARY INJUNCTION"

LINK TO PAR RECEIVERSHIPS WEBSITE (UNDER KEY COURT DOCUMENTS):
<https://parfundingreceivership.com/>

The Receiver: "I am a neutral party." vs Billing records show they were billing the estate to help the FBI build a criminal case.

THE RECEIVER AND RECEIVER'S ATTORNEY FED THE INQUIRER THE NARRATIVE THEY WANTED TO STAY IN POWER AND BILKED A MILLION PER MONTH FROM THE ESTATE WORKING AS DEFACTO PROSECUTORS.

THEY FED THE FBI ANYTHING THEY NEEDED WITH THE ESTATE'S MONEY TO PUT THE NAIL IN THE COFFIN SO THEY COULD CONTINUE TO CHARGE A MILLION PER MONTH AND AMAZINGLY ARE STILL CHARGING THAT AMOUNT TODAY -ALMOST 6 YEARS LATER! THEY ARE STILL SIPHENING AND FEASTING OFF PAR FUNDING.

AND HERE IS THE PROOF IN THE ACTUAL BILLING RECORDS LISTED ON THE RECEIVER'S WEBSITE:

THIS IS JUST A SMALL SAMPLE- THERE ARE THOUSANDS OF THESE BILLING ENTRIES. ALL PAID FOR BY NOTEHOLDERS, AND THE DEFENDANT'S ESTATE!

DE-438-8 (Receiver's First Billing):

8/30/2020	Review of Inquirer article and follow up on questions from FBI Special Agent Murphy.	TK	0.3	\$	118.50
8/30/2020	Correspondence w/ R. Stumphauzer, G. Alfano, T. Kolaya regarding response to court order.	IR	0.2	\$	79.00
8/30/2020	Review of filings regarding life settlement payments.	IR	0.5	\$	197.50
8/30/2020	Call w/ R. Stumphauzer, G. Alfano, T. Kolaya regarding response to Court Order, status report.	IR	0.9	\$	355.50
8/30/2020	Review of Schein e-mail and strategy for response to same.	IR	0.3	\$	118.50
8/30/2020	Preparation of response to Court Order regarding Vagnozzi payments, and review of documents for same.	IR	1.9	\$	750.50
8/30/2020	Review of materials for status report.	IR	0.2	\$	79.00
8/30/2020	Correspondence w/ R. Stumphauzer, G. Alfano regarding revisions to response, and preparation of revised draft.	IR	0.4	\$	158.00
8/30/2020	Phone conference with Alfano, Ross and Kolaya to discuss ESI report contents, to discuss recent correspondence from Schein re: GSuite, and to discuss contents of interim status update.	RKS	0.9	\$	355.50
8/30/2020	Draft proposed email in response to Schein email on today's date re: data intrusion, retention of corporate data.	RKS	0.6	\$	237.00

Case 9:20-cv-81205-RAR Document 438-8 Entered on FLSD Docket 12/16/2020 Page 85 of 123

8/30/2020	Review of email correspondence re: Vagnozzi settlement.	RKS	0.2	\$	79.00
8/30/2020	Review of Ian Ross draft response to Vagnozzi motion to pay insurance premiums, and to review/respond to several emails with proposed corrections to same.	RKS	0.4	\$	158.00
8/30/2020	Review of emails re: writs of garnishment reported in Philadelphia Inquirer, and to explain efforts to correct errors prior to Receivership.	RKS	0.2	\$	79.00

DE-438-9 (Receiver's Second Billing):

Case 9:20-cv-81205-RAR Document 438-9 Entered on FLSD Docket 12/16/2020 Page 77 of 135

GJA	9/14/2020	CORRESPONDENCE WITH ATTORNEY O'GRADY RE: PROMED AND ATRIUM	CA / T	0.30	395.00	118.50
GJA	9/14/2020	CORRESPONDENCE RE: PORTLAND DEVELOPMENT GROUP PROPERTY SALE AND STATUS OF LIEN	AAR / T	0.20	395.00	79.00
GJA	9/14/2020	REVIEWING DRAFT OF JOINT SCHEDULING ORDER	CA / T	0.40	395.00	158.00
GJA	9/14/2020	REPLY TO CORRESPONDENCE FROM COURT RE: VAGNOZZI V. INQUIRER	CA / T	0.20	395.00	79.00
GJA	9/14/2020	CONFERENCE CALL WITH RECEIVER, DOJ, FBI, RE: STATUS OF DOCUMENTS IN RESPONSE TO GRAND JURY SUBPOENA	CA / T	0.80	395.00	316.00
GJA	9/14/2020	CONFERENCE CALL WITH FBI; AND FOLLOW UP CALL WITH T. KOLAYA	CA / T	0.50	395.00	197.50
GJA	9/14/2020	CALL WITH AUSA ORTIZ RE: STATUS	CA / T	0.30	395.00	118.50
GJA	9/14/2020	SUMMARIZE VAGNOZZI V. INQUIRER CASE FOR INCLUSION IN PETITION TO LIFT LITIGATION STAY	CA / T	0.50	395.00	197.50
GJA	9/14/2020	CORRESPONDENCE WITH COURT RE: STATUS OF GARNISHMENT IN ST. JOHN'S PROPERTY	AAR / T	0.30	395.00	118.50
DKR	9/14/2020	PARTICIPATING IN CONFERENCE CALL WITH RECEIVER, DSI, GJA, AND U.S. ATTORNEY'S OFFICE RE: CASE STATUS	CA / T	0.80	395.00	316.00

CAN ANYONE EXPLAIN WHY THE RECEIVER, THE RECEIVER'S PARTNER, THE RECEIVER'S ATTORNEY, AND THE RECEIVER'S ATTORNEY'S PARTNER, ARE ON THE PHONE AND MEETING WITH THE FBI AND THE AUSA ALL DAY??

OHTO GET PAID TO BUILD A FAKE NARRATIVE TO CONVICT JOSEPH LAFORTE AND MAKE A CAREER OUT OF DESTROYING PAR FUNDING TO ENRICH THEMSELVES!

THE FIX WAS IN- THEY KNEW THEY HAD BUILT-IN PROSECUTORS TO BUILD THE CASE!!!!!!

THE DEFINITION OF A RECEIVER is an **officer of the court** appointed to take custody, manage, and preserve property or a business during litigation for the benefit of **all interested parties**, subject to the court's supervision. Keep in mind this Receiver was appointed by Judge Rodolfo Ruiz who believed every lie that the Receiver told because it was, "His Receiver".

The Narrative: "The money is gone! It's a Ponzi scheme!" vs The Philadelphia Inquirer now admits the company was SOLVENT and investors are being paid back 100%.

SEE LATEST INQUIRER NEWS ARTICLE!

<https://www.inquirer.com/business/par-funding-fraud-investors-cash-advance-lending-20251125.html>



The screenshot shows the top portion of a news article on the Philadelphia Inquirer website. At the top, there is a search icon on the left, the newspaper's name "The Philadelphia Inquirer" in the center, and a user profile icon on the right. Below the header, the word "BUSINESS" is displayed on the left, and "Gift" and "Share" buttons are on the right. The main headline reads "Latest Par Funding plan will give scammed investors nearly all their money back". Below the headline, a sub-headline states: "More than 1,600 people were victims of the high-interest loan scheme that diverted over \$200 million to Par insiders."



Philadelphia lawyer Gaetan Alfano represents court-appointed receiver Ryan K. Stumphauzer in overseeing Par Funding and A Better Financial Plan as their owners defend against SEC civil fraud charges. ... [Read more](#)
Pietragallo Gordon Alfano Bosick & Raspanti, LLP

LOOK AT THIS FAKE EXECUTIVE GAZING OUT THE WINDOW PROUD AS IF HE DID ANYONE A SERVICE BILKING THE ESTATE'S MONEY FOR 6 YEARS TO "PROTECT INVESTORS"! HE DID AN ACTUAL PHOTO SHOOT FOR THIS! HAHA

HOW IS IT POSSIBLE IF THE RECEIVER CHARGED \$30M, DESTROYED PAR, NEVER MADE A SINGLE DOLLAR (ZERO) IN EARNINGS, DID NOT COLLECT \$450 MILLION OF THE AR PORTFOLIO (ONLY A FRACTION) AND THERE'S STILL ENOUGH MONEY TO PAY BACK THE INVESTORS!??? IT IS FINANCIALLY IMPOSSIBLE THAT PAR WAS A PONZI SCHEME!!!

Par Funding defendants retained Joel Glick, the Director of Forensic and Advisory Services at Berkowitz Pollack Brant, the best accounting firm in Miami (who the SEC and FBI use in their own cases) to establish financial truth, challenge the opposing narrative, and protect the defendants from false or exaggerated claims to show the court what really happened.

PROFESSIONAL CREDENTIALS

Berkowitz Pollack Brant accountants are members of the [American Institute of Certified Public Accountants](#) (AICPA) and the [Florida Institute of Certified Public Accountants](#) (FICPA). We are registered with the [Public Company Accounting Oversight Board](#) (PCAOB), a private-sector

non-profit corporation created by the Sarbanes-Oxley Act of 2002, to oversee the auditors of public companies in order to protect the interests of investors.

We are a member of the AICPA's Employee Benefit Plan Audit Quality Center. This membership is only open to accounting firms that demonstrate a commitment to quality audits of pension, health and welfare, and 401(k) plans subject to the Employee Retirement Income Security Act (ERISA) under the authority of the U.S. Department of Labor.

We are subject to peer review examination under the auspices of the AICPA. Our most recent review was conducted in December 2020 and we received the highest-possible rating of *pass*.

JOEL GLICK, CPA/CFF, CFE, CGMA
DIRECTOR OF FORENSIC AND ADVISORY SERVICES

Joel Glick focuses his practice on fraud and forensic investigations, economic damages, litigation support, insolvency matters and business consulting. For more than 20 years, his work has spanned a variety of industries and business situations. This diverse experience makes him a valued advisor and strategic financial consultant.

Glick is an expert witness in state and federal courts. His business advisory practice includes mergers and acquisition support, due diligence, and pro-forma financial forecasts.

After countless months and billions of transactions later, Joel Glick prepared expert reports, declarations, and was deposed to confirm that Par Funding was NOT A PONZI!

See his expert report below:

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 20-CV-81205-RAR

SECURITIES AND EXCHANGE COMMISSION,

vs.

**COMPLETE BUSINESS SOLUTIONS GROUP,
INC. d/b/a PAR FUNDING, et al.,**

Defendants.

DECLARATION OF JOEL D. GLICK

1. Pursuant to 28 U.S.C. Section 1746, the undersigned states as follows:
2. My name is Joel Glick. I am over the age of 18 years and I make this declaration based upon my personal knowledge of the facts set forth herein.
3. I practice in the areas of forensic accounting and economic damages.
4. I have testified as an expert witness in both State and Federal courts. See attached Exhibit 1.
5. I am a Certified Public Accountant licensed in Florida, since 1994, and Certified in Financial Forensics, since 2008. Both credentials are through the American Institute of Certified Public Accountants.
6. I am a Certified Fraud Examiner credentialed through the Association of Certified Fraud Examiners since 2010.
7. I am a Director of Forensic and Advisory Services at Berkowitz Pollack Brant Advisors + CPA's ("BPB").
8. BPB was retained by the law firm of Fridman Fels & Soto, PLLC to assist with their

LOOK AT GLICK'S CONCLUSIONS FROM PAGE 4 OF HIS REPORT:

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- f. CBSG internally prepared spreadsheets (including but not limited to)
 - i. Daily Deposit Logs
 - ii. Investor Logs
 - iii. Bank Activity Log
- g. Financial Accounting Standards Board ("FASB") Accounting Standards Codification ("ASC")
- h. Any cited material inadvertently excluded from this list.

CONCLUSIONS³

15. DSI erroneously alleges CBSG was a Ponzi Scheme. A forensic analysis of the QuickBooks/Bank/ACH accounts, from 2012 through 2019, demonstrates that cash flows from merchants were sufficient to cover principal and interest payments made to investors.

16. DSI's incorrect use of a cash analysis as a proxy for profitability or earnings disregards U.S. Generally Accepted Accounting Principles ("GAAP").⁴ GAAP makes clear that a cash flow analysis alone is not appropriate to determine CBSG's profitability. As set forth below at paragraphs 52-54, any such analysis should have been performed based on the accrual basis method of accounting, which DSI did not

do. A forensic analysis of CBSG data using an accrual basis method of accounting reveals that CBSG was profitable, earning hundreds of millions of dollars in top-line revenue that was ignored by DSI.

17. DSI did not present a complete analysis of merchant receivables as they focused on what DSI refers to as an "Exception Portfolio," and appeared to have extrapolated this

³ I am generally aware that one of the issues in this case is whether the promissory notes issued by CBSG in this case constitute securities. As explained above, no statements in this declaration are intended to render any legal opinions or conclusions, and none are intended by my use of the term "investor" as opposed to "noteholder."

⁴ "U.S. GAAP (Generally Accepted Accounting Principles) are accounting standards, conventions and rules. It is what companies use to measure their financial results. These results include net income as well as how companies record assets and liabilities. In the US, the SEC has the authority to establish GAAP. However, the SEC has historically allowed the private sector to establish the guidance. See The Financial Accounting Standards Board," [Generally Accepted Accounting Principles \(GAAP\) | Investor.gov](#)

WHY DID JOSEPH LAFORTE PLEAD GUILTY?

The Fake News says, "If he's innocent, why did he plead?"

It's called Government Extortion!

They froze all his money so he couldn't hire a top-tier defense.
They threatened his wife with prison.
They used the \$30 Million so the Receiver could do the FBI's work for them.

When the Deep State holds your family hostage and steals your bank account, a plea deal isn't a confession—it's a ransom payment.

THE BOTTOM LINE

The Par Funding case proves that if the SEC AND FBI want your business, they will take it. They will call a simple disclosure issue a "RICO conspiracy," hire their friends to drain \$30 million in fees, and tell the public they are "saving" you.

It's time for an investigation into Amie Riggle Berlin and Ryan K. Stumphauzer. They didn't find a fraud—they created one so they could loot the estate!

AMIE RIGGLE ("RIGGED IT") BERLIN LIBERAL POLITICS AT WORK!!!!!!!!!!



It is not surprising since Amie Berlin is married to Bret Berlin, a Florida political figure who served as super delegate to the Democratic National Convention from Florida and supported Hillary Clinton for the Democratic nomination. He is a former chair of the Miami-Dade

Democratic Party and vice chair of the Florida Democratic Party, giving him a significant role in Democratic politics in the state.

Joe LaForte is a lifelong MAGA Republican.