

The Receiver's Eighth Billing: Unmasking Exhibits 3A through 3E

By Freedom Fighters of America

The Complete Business Solutions Group (DBA Par Funding) Receivership is a textbook example of how a government-mandated takeover is used to completely wipe out an estate's assets to feed a network of connected lawyers, consultants, and investigators.

In his "Eighth Application" for fees, Receiver Ryan K. Stumphauzer claims to be exercising "business judgment" and offering "significantly discounted" rates to the court. He packages this illusion neatly in summary tables labeled Exhibits 3(a) through 3(e). But when you match these slick summaries against the actual 500-page micro-billing logs, the fraud on the court becomes undeniable.

This is a masterclass in bill stacking, systemic redundancy, and ABA billing guideline violations. Here is the total breakdown of the Receiver's multi-headed hydra of billing, exposing exactly how they extracted over \$1.06 million in just 90 days.

Exhibit 3(a): The Receiver's Firm – Premium Rates for Paper Pushing Total Billed (3 Months): \$207,905.50 | 674.4 Hours.

In Exhibit 3(a), the Receiver praises himself for dropping his firm's partner rates to \$395.00 an hour. But a "discounted" rate is meaningless if you use it to over-staff and over-bill for basic administrative chores.

The Claim: High-level legal administration and complex asset recovery.

The Reality: The Receiver and his partner, Timothy Kolaya, routinely billed \$395.00 an hour for basic clerical tasks that should have been delegated to a \$100-an-hour paralegal.

****There are too many to list, but here are a few examples of the infractions:***

-April 14, 2022: R. Stumphauzer billed \$395.00/hour to "Review voluminous mail... scanned same, drafted cover email".

-April 20, 2022: T. Kolaya billed 2.30 hours (\$908.50) to "Download and organize of case filings and other record documents for purposes of updating receivership website".

-June 27, 2022: Stumphauzer billed \$395.00/hour to work with a paralegal to "notarize COJ Documents".

Exhibit 3(b): The "Co-Counsel" Army – A Second Law Firm to Stack the Bills Total Billed (3 Months): \$604,392.50 | 1,881.4 Hours.

Why does a receiver, who is already a partner at a specialized law firm, need a second massive law firm? To stack the bills. Exhibit 3(b) lists sixteen different professionals from Pietragallo Gordon Alfano Bosick & Raspanti, LLP bleeding the estate simultaneously.

The Claim: The Receiver needed "co-counsel" with specialty experience to oversee a "complex receivership".

The Reality: The Pietragallo firm functioned as an echo chamber, dialing into the same meetings and reviewing the same documents as Stumphauzer's firm, multiplying the cost of every action by two, three, or four.

Imagine hiring a tutor for your child for mathematics and they quote you for \$395 an hour, you expect one tutor. Then you come from work expecting a bill of \$395 for one hour of tutoring and the bill is \$1185 because three tutors showed up. But you only hired one. One would feel cheated and misled by the tutor you hired and of course would object to paying such an exorbitant fee that was never agreed upon and would be in violation of the agreement.

Here, Stumphauzer (\$395/hr), Kolaya (\$395/hr), and Pietragallo's Gaetan Alfano (\$395/hr) routinely billed for attending the exact same Zoom calls and strategy meetings. Three high-priced lawyers (posing and tricking the court by offering "discounted rates") sitting on a single phone call means the estate is bleeding \$1,185.00 every single hour they talk to each other. This has happened all day for the past 6 years. They consumed over 3000 hrs. of billing in a single quarter-do they have any other clients?! I wonder what an investigation into their books and records would show.

Exhibit 3(c): The Operations "Consultants" – Managing a Shuttered Business
Total Billed (3 Months): \$203,040.00 | 451.2 Hours

If two law firms billing nearly \$800,000 in three months was not enough, exhibit 3(c) introduces Development Specialists, Inc. (DSI) as an "operations consultant".

The Claim: DSI is overseeing and managing the day-to-day operations of Par Funding at a blended rate of \$450 an hour.

The Reality: The Receiver essentially closed the business. The owners were evicted, and no new advances were being written. What exactly is there to "manage" that justifies over \$200,000 in 90 days?

The logs show DSI consultants like Yale Bogen jumping on the exact same Zoom calls as Stumphauzer, Kolaya, and Alfano to "discuss edits and revisions to quarterly status

reports". When you add DSI's \$450/hour rate to the three \$395/hour lawyers on the call, the estate is paying an astronomical \$1,635.00 an hour just to edit a Word document.

**Exhibit 3(d): The eDiscovery Specialists – Outsourcing the Document Review
Total Billed (3 Months): \$2,518.75 | 7.8 Hours**

Exhibit 3(d) brings in Lawgical Insight, LLC, billing \$325.00 an hour to manage "e-discovery and litigation support".

The Claim: Digital evidence and computer forensics consulting are necessary to manage the electronic records.

The Reality: While Lawgical Insight is billing to set up the document databases, the two law firms are billing thousands of hours to actually read them. It is yet another layer of outsourced administration piled on top of an already bloated legal apparatus.

**Exhibit 3(e): The Private Investigators – Doing the Government's Job
Total Billed (3 Months): \$5,287.50 | 23.5 Hours.**

This is the most glaring proof that the Receiver abandoned his role as a neutral custodian and transformed into a de facto prosecutor. Exhibit 3(e) introduces H.D. Investigative Group, billing at \$225.00 an hour.

The Claim: Retired detectives are needed to analyze property, trace assets, and conduct witness interviews.

The Reality: Investigating alleged fraud is the job of the SEC and the FBI, not a civil receiver funded by the frozen assets of the company. Even worse, the lawyers were already billing for this exact work.

Stumphauzer personally billed 6.10 hours (\$2,409.50) on May 21 for "open-source research" to establish business and personal relationships. The estate is paying \$395/hour for a lawyer to do Google searches and then paying private investigators \$225/hour to do the actual investigating.

The Verdict: A Deliberate Wiping of the Estate

This is not a clean, conservative billing operation. Exhibits 3(a) through 3(e) are the blueprints of a sanctioned heist. The Receiver laid out a network of five separate firms to ensure that every single task, phone call, and document review is touched by multiple hands and billed multiple times.

The SEC, whose sworn duty is to "protect investors," looked at this \$1.06 million, 90-

day invoice—which generated zero new revenue for the company—and officially stated they had "no objection". The judge then blindly rubber-stamps it.

They lied to the court with their "efficiency" summaries in Exhibit 3, while using their 500-page billing logs to drain the estate completely dry.

Freedom Fighters of America demands accountability for this scam billing, fraud on the court, the estate, and the investors. We will not stay silent while the administrative state destroys businesses to keep their own gravy train rolling!