

## **Serving Two Masters: The Ultimate Conflict of Interest**

Imagine fighting for your life and the business you built from the ground up. The government sends Receiver, Ryan K. Stumphauzer and his team of attorneys from Pietragallo Gordon Alfano Bosick & Raspanti, LLP who relentlessly attack Joseph LaForte. They seize his assets, freeze all his accounts, and completely hijack his highly profitable company, Par Funding. For years, this Receiver and his law firm dumped mountains of civil litigation on LaForte, doing everything possible to destroy him, liquidate the business, and line their own pockets.

Then comes the criminal case. Par Funding, the corporate entity, is named as a co-defendant alongside LaForte. By law, the company needs a defense attorney to fight the charges.

So, who does Obama-appointed Judge Mark Kearney tap for the job?

He appointed Douglas K. Rosenblum to defend Par Funding. Douglas K. Rosenblum (DKR) is a partner from Pietragallo Gordon Alfano Bosick & Raspanti, LLP, the exact same law firm representing the Receiver, who just spent years trying to ruin LaForte.

**This is not a typo! You are not reading this incorrectly! This is real!**

**To this very day, this law firm is simultaneously representing the Receiver who is trying to destroy Par Funding AND acting as the criminal defense attorney supposedly "defending" Par Funding.**

### **You Cannot Serve Two Masters**

It is the oldest rule in the book, dating back to the Bible: No man can serve two masters. In the legal world, it is a basic fiduciary duty. When lawyers take on a new client, they are required to run exhaustive "conflict checks" through their system. If there is even a hint of overlapping, adverse interests, it is an automatic red flag, and the firm must recuse itself.

This absolute conflict of interest never, ever would have passed a standard ethical check. The only reason it happened here is because an Obama-appointed judge actively bypassed the ethical guardrails to plant a saboteur as a poison pill inside the defense camp.

### **The defense's motion explicitly calls out this profound violation right on Page 2:**

*"Douglas Rosenblum and the Law Firm of Pietragallo Gordon Alfano Bosick & Raspanti, LLP currently represent Mr. Ryan Stumphauzer, the Receiver appointed in Securities and Exchange Commission v. CBSG d/b/a Par Funding. Because of that current mandate, counsel's interests*

*and obligations are diametrically opposed to zealously representing CBSG against the allegations in the current criminal prosecution." (Page 2)*

Let this sink in. It is simple, clear, and absolutely terrifying for anyone who believes in the Constitutional right to a fair trial.

In the Civil Case: The Receiver's legal team aggressively attacked Par Funding. As the motion states on Page 3: *"At every turn, the Receiver, by and through his counsel, has relentlessly characterized CBSG and the Defendants as dishonest and having engaged in unlawful activity."* They billed over \$50 million in fees doing it.

**In the Criminal Case:** That exact same law firm, via Douglas Rosenblum, is expected to stand up in a criminal courtroom and aggressively defend Par Funding against those exact same accusations????

Even the federal judge in the civil case, Judge Ruiz, noted the absolute absurdity of this setup, stating on the record: *"The Receiver is an arm of the Court... The two roles are wholly incongruous and incompatible."* (Page 8, Footnote 6)

Imagine a trial with Douglas Rosenblum sitting at the defense table. The prosecution would have a field day. They would not even have to work for a conviction. They would just point to the defense table and use the exact civil litigation that the Receiver filed against LaForte to secure an easy guilty verdict. Judge Kearney did not assign Par Funding a defense lawyer; he assigned them a built-in saboteur.

### **The Fake Assault Charge: A Manufactured Smear**

The Swamp's corruption did not stop at rigging the defense. They needed to smear Joseph LaForte's character to prejudice the court and the public against him.

The government alleged that Joseph LaForte assaulted Gaetan Alfano—a partner at the very same law firm representing the Receiver.

There is just one glaring, undeniable problem with this accusation: Joseph LaForte was confined to his home on a government-issued ankle monitor when the alleged assault happened. The feds knew exactly where he was. They had his real-time GPS coordinates. He was at home. Yet

they allowed this fabricated story to become part of the narrative because the truth did not fit their agenda.

As noted on Page 2 of the motion, this fake assault created yet another impossible conflict, pitting trial counsel's *"fiduciary obligations to G.A. – a colleague at the same Law Firm --- and his obligations to CBSG."*

### **The Endless "Slow Roll": Fees, Fees, Fees**

You might be asking yourself - Why is Par Funding—a corporate entity—still fighting a criminal case years later? A corporation cannot be put in handcuffs. A corporation cannot be sent to federal prison.

**The answer is sickeningly simple: fees, fees, fees!**

The Receiver and his law firm are slow rolling this criminal case to milk the clock and bleed LaForte's seized assets dry. As long as the case remains unresolved, the meter keeps running. They have zero incentive to resolve the case, because the day the case ends is the day their \$50-million-and-counting gravy train derails.

They were not just managing assets; they were acting as shadow prosecutors. As the defense motion points out on Page 9, these lawyers had a massive financial motive to secure a criminal conviction: *"The Receiver and his Law Firm have 50,000,000 reasons to work with the USAO to bring a criminal prosecution and see that it is successful."*

### **The Extortion: Why the Government Forced a Plea**

The government knew they could not win this case on the merits. Par Funding was a legitimate, profitable business, and the federal prosecutors knew it. But the Swamp does not play fairly. Instead of trying the case on the facts, they engineered a situation where fighting back became impossible.

### **They used three devastating, unethical tactics to force Joseph LaForte into a plea deal:**

- They stacked the indictment with an overwhelming amount of fabricated, duplicative charges designed to bury the defense in paperwork and procedural hurdles.
- They planted Douglas Rosenblum in the defense camp, legally neutralizing Par Funding's ability to defend itself and ensuring the defense table was working directly with the AUSA.
- They used LaForte's wife, Lisa McElhone, as a pawn, threatening to drag her down with a superseding RICO indictment if he didn't surrender.

When the government holds your wife hostage with bogus RICO threats, and your co-defendant which is Par Funding is now being represented by your biggest adversary who has spent the last three years working with the feds to destroy you, the game is rigged. These three factors left LaForte with no choice but to take a plea. It was not justice; it was a hostage negotiation.

If you think this is just speculation, the proof is hiding in plain sight. *The Receiver's own publicly filed billing records show they spent over 521 hours communicating with law enforcement and the FBI, actively feeding them information **prior to becoming counsel for Par Funding** to help manufacture the criminal indictment against their own client. (Page 8)*

Don't take my word for it. Look at the receipts. Below is the actual billing records submitted and filed by the Receiver, proving exactly how much time and money, they spent colluding with the government to rig this case. Each application for billing is almost one thousand pages long.

**\*\*\*As a sidebar to all our business owners who actually ran a business. Imagine receiving a bill from your law firm that is over 10000 pages long while your company is producing zero income. It is an absolute joke. They are fishing from the already caught bucket and billing the estate by collecting on existing assets and billing for it.**

Below are snapshots of the billing and fees from Douglas Rosenblum (DKR) coordinating with his partner, Gaetan Alfano, his client, The Receiver, Ryan K. Stumphauzer, the FBI, AUSA, and government here. You cannot make this up. He is feeding the FBI and AUSA lies and then is appointed to defend Par Funding after he had the company indicted!!!!

[Case 9:20-cv-81205-RAR Document 438 Entered on FLSD Docket 12/16/2020](#)

**RECEIVER, RYAN K. STUMPHAUZER'S FIRST APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR JULY 27, 2020 – SEPTEMBER 30, 2020**

8/11/2020 Review email from Rosenbloom to FBI agents. RKS 0.1 \$ 39.50

DKR 7/31/2020 CONFERRING WITH FBI RE: POTENTIAL SOURCES OF INFORMATION TO ASSIST RECEIVER CA/T 0.20 395.00 79.00

DKR	8/5/2020	CONFERRING WITH <b>FBI</b> RE: DOCUMENT COLLECTION AT PAR FUNDING SITES	CA / T	0.20	395.00	79.00
DKR	8/5/2020	CONFERRING WITH T. KOLAYA, ESQUIRE AND A. BERLIN, ESQUIRE RE: DOCUMENT COLLECTION AT PA LOCATIONS OF RECEIVERSHIP; DRAFTING CORRESPONDENCE RE: SAME	CA / T	0.40	395.00	158.00
DKR	8/6/2020	ACCOMPANYING <b>FBI</b> TO OBTAIN COPIES OF DOCUMENTS AT TWO PAR FACILITIES IN	AAR / T	3.40	395.00	1,343.00
DKR	8/6/2020	REPRESENTING RECEIVER AT SECOND DAY OF DEPOSITION OF D. VAGNOZZI	CA / T	4.60	395.00	1,817.00
DKR	8/6/2020	PARTICIPATING IN CONFERENCE CALLS WITH GJA AND RECEIVER RE: CASE STATUS AND STRATEGY ON TOPICS INCLUDING, BUT NOT LIMITED TO, WRITS IN PHILADELPHIA, REAL ESTATE HELD BY DEFENDANTS, DEPOSITION OF D. VAGNOZZI, AND ENGAGEMENT OF EXPERT ON DAY-TO-DAY OPERATIONS OF BUSINESSES SUBJECT TO RECEIVERSHIP	CA / T	1.00	395.00	395.00
DKR	8/6/2020	MEETING WITH CAI TO SECURE SAFE KEY, COPY OF SEARCH WARRANT, AND <b>FBI</b> INVENTORY LIST	CA / T	0.20	395.00	79.00
DKR	8/13/2020	MULTIPLE CORRESPONDENCE WITH <b>FBI</b> RE: RETURN OF COMPUTERS IMAGED BY <b>FBI</b> FOLLOWING THEIR RAID AT N. 3RD STREET LOCATION; MEETING <b>FBI</b> AT LOCATION FOR SAME	CA / T	0.80	395.00	316.00
DKR	8/18/2020	CORRESPONDENCE WITH <b>FBI</b> AND RECEIVER RE: REQUEST FOR COPY OF COMPUTER IMAGE OBTAINED BY <b>FBI</b>	CA / T	0.20	395.00	79.00
DKR	8/27/2020	MULTIPLE CORRESPONDENCE WITH <b>FBI</b> AND RECEIVER'S FIRM RE: ELECTRONIC ACCESS TO RECORDS OF RECEIVERSHIP ENTITIES	CA / T	0.20	395.00	79.00
DKR	8/28/2020	MULTIPLE CORRESPONDENCE WITH <b>FBI</b> AND OUR FIRM'S TEAM RE: REVIEW OF DOCUMENTS IN GOVERNMENT'S POSSESSION (ESPECIALLY WITH RESPECT TO COLLATERAL)	CA / T	0.20	395.00	79.00
DKR	8/28/2020	TELEPHONE CONFERENCE WITH AUSA J. ORTIZ RE: SEGREGATION OF PRIVILEGED DOCUMENTS DURING DOCUMENT REVIEW	CA / T	0.20	395.00	79.00
DKR	9/23/2020	DRAFTING CORRESPONDENCE TO U.S. ATTORNEY'S OFFICE, <b>FBI</b> , AND RECEIVERSHIP TEAM RE: LIST OF ATTORNEYS AND PARAPROFESSIONALS WHO PREVIOUSLY REPRESENTED AND/OR CURRENTLY REPRESENT RECEIVERSHIP ENTITIES AND DEFENDANTS	CA / T	0.10	395.00	39.50
<b>DKR</b>	9/23/2020	REVIEWING CORRESPONDENCE RE: LEGAL RESEARCH ON EXPANSION OF RECEIVERSHIP	AAR / T	0.20	395.00	79.00
GJA	9/23/2020	CONFERRING WITH <b>DKR</b> RE: CASE STRATEGY	CA / T	0.20	395.00	79.00
<b>DKR</b>	9/24/2020	PARTICIPATING IN ZOOM CONFERENCE WITH GJA, RECEIVER, AND TEAM FROM RECEIVER'S FIRM RE: CASE STATUS, STRATEGY, AND NEXT STEPS	CA / T	1.20	395.00	474.00
<b>DKR</b>	9/24/2020	ANALYZING RECENT FILINGS AND ORDERS FROM COURT IN S.D.FL.	CA / T	0.80	395.00	316.00

DKR	9/24/2020	CORRESPONDENCE WITH SEC CONTRACTOR RE: RETURN OF DOCUMENTS SCANNED; REVIEWING AND REPLYING TO CORRESPONDENCE FROM A. BERLIN, ESQUIRE RE: SAME	CA / T	0.30	395.00	118.50
DKR	9/29/2020	REVIEWING AND REPLYING TO FBI RE: INQUIRY RE: GOOGLE ACCOUNTS, CONVERGE HUB, AND MCA SUITE	CA / T	0.30	395.00	118.50
HFR	8/28/2020	COMMUNICATIONS WITH DKR AND J. MURRAY, FBI, RE: REVIEW OF PAR FUNDING DOCUMENTS AT FBI;	AAR / T	0.30	100.00	30.00

Case 9:20-cv-81205-RAR Document 491 Entered on FLSD Docket 02/16/2021-  
**RECEIVER, RYAN K. STUMPHAUZER'S SECOND APPLICATION  
FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND  
REIMBURSEMENT OF EXPENSES FOR OCTOBER 1, 2020 – DECEMBER 31, 2020**

DKR	10/7/2020	CORRESPONDENCE RE: FBI/IRS ACCESS TO RECEIVERSHIP QUICKBOOKS FILES	CA / T	0.20	395.00	79.00
DKR	10/7/2020	CONFERRING WITH GJA RE: CASE STRATEGY	CA / T	0.20	395.00	79.00
DKR	10/7/2020	REVIEWING MULTIPLE PAPERLESS ORDERS ISSUED BY COURT FOLLOWING TODAY'S LENGTHY STATUS CONFERENCE	CA / T	0.10	395.00	39.50
DKR	10/9/2020	DRAFTING DETAILED MEMORANDUM TO RECEIVER RE: STATUS OF REVIEW OF DOCUMENTS AT PAR FUNDING AND AT FBI	CA / T	0.40	395.00	158.00
DKR	10/9/2020	REVIEWING PAR FUNDING DOCUMENTS MARKED AS POTENTIALLY PRIVILEGED FROM BOXES HOUSED AT FBI (HFR AND KAH REMOVED THESE DOCUMENTS BEFORE FBI CONDUCTED ITS ANALYSIS/REVIEW)	CA / T	1.00	395.00	395.00
DKR	10/12/2020	REVIEWING CORRESPONDENCE FROM GJA RE: ANALYSIS OF DOCUMENTS HOUSED AT FBI	CA / T	0.10	395.00	39.50
DKR	11/4/2020	REVIEWING AND REPLYING TO CORRESPONDENCE FROM FBI RE: STATUS OF HARD COPY DOCUMENTS HOUSED AT PAR LOCATIONS ON N. 3RD STREET AND ARCH STREET IN PHILADELPHIA	CA / T	0.10	395.00	39.50
DKR	11/9/2020	TELEPHONE CONFERENCE WITH GJA AND AUSA PATRICK MURRAY RE: PRIVILEGE REVIEW OF PAR FUNDING DOCUMENTS	CA / T	0.40	395.00	158.00

DKR	11/10/2020	CORRESPONDENCE WITH U.S. ATTORNEY'S OFFICE, FBI, AND RECEIVER'S TEAM RE: PRIVILEGE REVIEW OF G-SUITE DOCUMENTS	CA / T	0.40	395.00	158.00
DKR	11/11/2020	MULTIPLE CORRESPONDENCE IN PREPARATION FOR CONFERENCE ON 11/12/20 WITH U.S. ATTORNEY'S OFFICE, FBI, DSI, AND RECEIVER'S COUNSEL RE: ELECTRONIC DOCUMENTS OF PAR FUNDING	CA / T	0.50	395.00	197.50
DKR	11/12/2020	PARTICIPATING IN CONFERENCE CALL WITH U.S. ATTORNEY'S OFFICE, FBI, DSI, AND RECEIVER'S COUNSEL IN FLORIDA RE: PAR FUNDING'S ELECTRONIC DOCUMENTS AND REVIEW PROCESS/PRIVILEGE REVIEW OF SAME	CA / T	1.10	395.00	434.50
DKR	11/13/2020	MULTIPLE CORRESPONDENCE RE: SPREADSHEET TO BE SENT TO U.S. ATTORNEY'S OFFICE AND FBI RE: PAR FUNDING'S ELECTRONIC RECORDS	CA / T	0.40	395.00	158.00
DKR	12/16/2020	MULTIPLE CORRESPONDENCE WITH DSI RE: REQUEST BY IRS AND FBI FOR INFORMATION RE: HERITAGE BUSINESS CONSULTING	CA / T	0.30	395.00	118.50
DKR	12/17/2020	CORRESPONDENCE RE: REQUEST OF IRS AND FBI FOR DATA RE: HERITAGE BUSINESS CONSULTING	CA / T	0.20	395.00	79.00
DKR	12/17/2020	REVIEWING, COMPILING, AND PRODUCING PST FILES RELATED TO SELECT PAR FUNDING CUSTOMERS IDENTIFIED BY U.S. ATTORNEY'S OFFICE	CA / T	3.00	395.00	1,185.00
DKR	12/17/2020	MULTIPLE CORRESPONDENCE RE: NOTICE OF TRUST PETITION IN NEVADA STATE COURT RE: LME TRUST	CA / T	0.40	395.00	158.00

Case 9:20-cv-81205-RAR Document 589 Entered on FLSD Docket 05/17/2021

**RECEIVER, RYAN K. STUMPHAUZER'S THIRD APPLICATION  
FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND  
REIMBURSEMENT OF EXPENSES FOR JANUARY 1, 2021 – MARCH 31, 2021**

1/14/21	DKR		CA / T	0.30	\$395.00	\$118.50
		MULTIPLE CORRESPONDENCE RE: FBI REQUEST FOR ACCESS TO PAR FUNDING'S OFFICES ON 3RD STREET IN PHILADELPHIA TO VIEW BOOKS AND RECORDS				



3/7/21	DKR		AAR / T	0.20	\$395.00	\$79.00
		MULTIPLE CORRESPONDENCE RE: INTERVIEW OF A. BERLINER RE: TEXAS PROPERTY				
3/7/21	DKR		AAR / T	0.20	\$395.00	\$79.00
		REVIEWING AND DRAFTING CORRESPONDENCE RE: POTENTIAL INTERVIEW OF DEMBITZER RE: TEXAS PROPERTY				
3/7/21	DKR		AAR / T	0.20	\$395.00	\$79.00
		REVIEWING MULTIPLE CORRESPONDENCE RE: MANAGEMENT OF VARIOUS RECEIVERSHIP PROPERTIES IN PHILADELPHIA, PA				
3/7/21	DKR	DRAFTING CORRESPONDENCE TO DSI RE: FBI'S INQUIRY RE: UCC FILINGS	CA / T	0.10	\$395.00	\$39.50
3/7/21	DKR	MULTIPLE CORRESPONDENCE WITH GJA RE: STATUS OF OPEN TASKS FOR RECEIVERSHIP	CA / T	0.20	\$395.00	\$79.00
3/7/21	DKR	REVIEWING CORRESPONDENCE AND DRAFT STIPULATION RE: SETTLEMENT OF CONTEMPT PROCEEDINGS AGAINST MCELHONE AND COLE	CA / T	0.30	\$395.00	\$118.50
3/31/21	DKR		AAR / T	0.30	\$395.00	\$118.50
		DRAFTING CORRESPONDENCE TO FBI (WITH CC TO U.S. ATTORNEY'S OFFICE) RE: UCC SEARCHES RELATING TO RECEIVERSHIP ENTITIES				

Case 9:20-cv-81205-RAR Document 699 Entered on FLSD Docket 08/16/2021

**RECEIVER, RYAN K. STUMPHAUZER'S FOURTH APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR APRIL 1, 2021 – JULY 31, 2021**

4/6/2021	DKR	MULTIPLE CORRESPONDENCE RE: EMAILS REQUESTED BY FBI AND U.S. ATTORNEY'S OFFICE	CA / T	0.60	395.00	\$237.00
4/26/2021	DKR	REVIEWING DEFENDANT MCELHONE'S REQUEST FOR PRODUCTION OF DOCUMENTS SERVED ON SEC	CA / T	0.20	395.00	\$79.00
4/26/2021	DKR	CONFERRING WITH GJA RE: CASE STATUS AND STRATEGY	CA / T	0.20	395.00	\$79.00
5/4/2021	DKR	CORRESPONDENCE WITH GJA AND T. KOLAYA, ESQUIRE RE: TODAY'S DEPOSITION OF LAFORTE	CA / T	0.10	395.00	\$39.50

5/7/2021	DKR	MULTIPLE CORRESPONDENCE WITH INTERNAL TEAM AND FBI RE: TITLES OF VEHICLES HELD BY RECEIVERSHIP	AAR / T	0.50	395.00	\$197.50
6/3/2021	DKR	REVIEWING MOTION FILED BY DEFENDANT LAFORTE RE: REDACTED EXHIBITS	CA / T	0.20	395.00	\$79.00
6/3/2021	DKR	CORRESPONDENCE RE: FBI REQUEST FOR ACCESS TO CONVERGEHUB	CA / T	0.10	395.00	\$39.50
6/3/2021	DKR	CONFERRING WITH FBI RE: STATUS OF REQUESTS	CA / T	0.10	395.00	\$39.50

Case 9:20-cv-81205-RAR Document 948 Entered on FLSD Docket 11/15/2021

**RECEIVER, RYAN K. STUMPHAUZER'S FIFTH APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR JULY 1, 2021 – SEPTEMBER 30, 2021**

7/19/2021	DKR	REVIEWING OPPOSITION BRIEF FILED BY LAFORTE	CA / T	0.20	395.00	\$79.00
8/16/2021	HFR	UPDATE CHART OF DOCUMENT PRODUCTIONS TO FBI BY D. ROSENBLUM,	CA / T	0.20	100.00	\$20.00
8/19/2021	DKR	REVIEWING MOTION BY L. MCELHONE TO CONTINUE UPCOMING HEARING	CA / T	0.20	395.00	\$79.00
8/31/2021	DKR	REVIEWING LAFORTE'S RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS	CA / T	0.10	395.00	\$39.50
9/1/2021	DKR	REVIEWING DISCOVERY RESPONSES FROM L. MCELHONE	CA / T	0.10	395.00	\$39.50
9/14/2021	DKR	REVIEWING SEC'S MOTION FOR CONTEMPT AGAINST DEFENDANT MCELHONE AND FOX ROTHSCHILD	CA / T	0.20	395.00	\$79.00
9/15/2021	DKR	REVIEWING SEC MOTION RE: CONTEMPT BY DEFENDANT MCELHONE AND FOX ROTHSCHILD; REVIEWING FOX ROTHSCHILD'S MOTION TO STRIKE SAME	CA / T	0.60	395.00	\$237.00
9/28/2021	DKR	CORRESPONDENCE RE: DEFENDANT L. MCELHONE'S USE OF POST OFFICE BOX IN THE NAME OF CBSG	CA / T	0.30	395.00	\$118.50
9/29/2021	DKR	MULTIPLE CORRESPONDENCE RE: COMPUTER DEVICES IN POSSESSION OF FBI AND/OR REQUESTED BY FBI	CA / T	0.40	395.00	\$158.00

9/30/2021	DKR	CORRESPONDENCE WITH FBI RE: COMPUTER EQUIPMENT	CA / T	0.10	395.00	\$39.50
-----------	-----	--	--------	------	--------	---------

Case 9:20-cv-81205-RAR Document 1153 Entered on FLSD Docket 02/15/2022

**RECEIVER, RYAN K. STUMPHAUZER'S SIXTH APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR OCTOBER 1, 2021 – DECEMBER 31, 2021**

10/12/2021	DKR	MULTIPLE CORRESPONDENCE RE: FBI'S REQUEST FOR INFORMATION RE: RECEIVERSHIP VEHICLES	CA / T	0.60	395.00	\$237.00
11/5/2021	DKR	ATTENDING TELEPHONIC FOLLOW-UP INTERVIEW OF B. MANNES BY FBI AND DOJ	CA / T	0.70	395.00	\$276.50
12/7/2021	DKR	CORRESPONDENCE INDIVIDUALLY WITH U.S. ATTORNEY'S OFFICE FOR N.D.N.Y., FBI, DSI, M. RUSSO, CLIENT, AND CO-COUNSEL RE: NEW SUBPOENA FOR DOCUMENTS	CA / T	0.30	395.00	\$118.50

Case 9:20-cv-81205-RAR Document 1246 Entered on FLSD Docket 05/17/2022

**RECEIVER, RYAN K. STUMPHAUZER'S SEVENTH APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR JANUARY 1, 2022 – MARCH 31, 2022**

1/24/2022	DKR	CORRESPONDENCE RE: REISSUANCE AND SERVICE OF WRIT AGAINST J. LAFORTE IN HAVERFORD, PA	AAR / T	0.20	\$395.00	\$79.00
1/24/2022	DKR	CORRESPONDENCE WITH G. ALFANO AND T. KOLAYA RE: CALCULATING LOSSES TO INVESTORS	CA / T	0.20	\$395.00	\$79.00
1/25/2022	DKR	CORRESPONDENCE RE: REISSUANCE AND SERVICE OF WRIT OF SUMMONS ON J. LAFORTE IN HAVERFORD, PA	AAR / T	0.40	\$395.00	\$158.00
1/25/2022	DKR	MULTIPLE CORRESPONDENCE RE: CALCULATING LOSSES TO INVESTORS	CA / T	0.40	\$395.00	\$158.00
3/1/2022	DKR	ANALYZING LAFORTE'S RESPONSE IN OPPOSITION TO RECEIVER'S QUARTERLY FEE PETITION	CA / T	0.20	\$395.00	\$79.00

3/23/2022	DKR	REVIEWING COMPLAINT FILED AGAINST JOSEPH AND JAMES LAFORTE	AAR / T	0.40	\$395.00	\$158.00
-----------	-----	--	---------	------	----------	----------

Case 9:20-cv-81205-RAR Document 1358 Entered on FLSD Docket 08/15/2022

**RECEIVER, RYAN K. STUMPHAUZER'S EIGHTH APPLICATION FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND REIMBURSEMENT OF EXPENSES FOR APRIL 1, 2022 – JUNE 30, 2022**

4/6/2022	DKR	CORRESPONDENCE WITH FBI RE: ITS REQUEST FOR SUPPLEMENTAL INFORMATION		0.10	\$395.00	\$39.50
4/7/2022	DKR	CORRESPONDENCE RE: SUPPLEMENTAL REQUEST FOR INFORMATION FROM FBI; CORRESPONDENCE TO FSP STAFF RE: SAME		0.20	\$395.00	\$79.00
4/13/2022	DKR	TELEPHONE CONFERENCE WITH IRS, FBI, AND FSP STAFF RE: SUPPLEMENTAL REQUEST FOR INFORMATION; CONFERRING SEPARATELY WITH STAFF RE: SAME		1.00	\$395.00	\$395.00
6/1/2022	DKR	TELEPHONE CONFERENCE WITH A. BERLIN, ESQUIRE OF SEC RE: REQUESTS FROM OTHER GOVERNMENT AGENCIES DIRECTED TO RECEIVERSHIP; DRAFTING CORRESPONDENCE RE: SAME		0.50	\$395.00	\$197.50
6/1/2022	DKR	MULTIPLE CORRESPONDENCE RE: MAINTENANCE AND LEASING OF REAL ESTATE OWNED BY RECEIVERSHIP		0.20	\$395.00	\$79.00
6/1/2022	DKR	REVIEWING AND REPLYING TO FBI RE: REQUESTS FOR INFORMATION		0.40	\$395.00	\$158.00
6/2/2022	DKR	RESPONDING TO FBI SUPPLEMENTAL REQUEST FOR INFORMATION		0.30	\$395.00	\$118.50
6/2/2022	DKR	DRAFTING DETAILED CORRESPONDENCE TO R. STUMPHAUZER, ESQUIRE, T. KOLAYA, ESQUIRE, AND GJA RE: RECENT CORRESPONDENCE WITH GOVERNMENT		0.30	\$395.00	\$118.50
6/3/2022	DKR	ZOOM CONFERENCE WITH R. STUMPHAUZER, ESQUIRE, T. KOLAYA, ESQUIRE, AND GJA RE: CASE STATUS, STRATEGY, AND NEXT STEPS		1.00	\$395.00	\$395.00
6/3/2022	DKR	REVIEWING CORRESPONDENCE FROM FBI DALLAS; CALLING SPECIAL AGENT T. NEYLAN		0.10	\$395.00	\$39.50
6/6/2022	DKR	CORRESPONDENCE WITH FBI RE: INVESTIGATION; CONFERRING WITH J. KLENK RE: SAME		0.50	\$395.00	\$197.50
6/6/2022	DKR	CONFERRING WITH FBI SPECIAL AGENT IN DALLAS, TEXAS RE: REQUEST FOR INFORMATION; CONFERRING WITH JK RE: SAME; DRAFTING CORRESPONDENCE TO GJA RE: SAME		0.80	\$395.00	\$316.00

Case 9:20-cv-81205-RAR Document 1440 Entered on FLSD Docket 11/15/2022

**RECEIVER, RYAN K. STUMPHAUZER'S NINTH APPLICATION  
FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND  
REIMBURSEMENT OF EXPENSES FOR JULY 1, 2022 – SEPTEMBER 30, 2022**

8/11/2022	DKR	CORRESPONDENCE WITH FBI AND GJA RE: GOVERNMENT'S SUPPLEMENTAL REQUEST FOR INTERVIEW	0.40	\$395.00	\$158.00
-----------	-----	---	------	----------	----------

Case 9:20-cv-81205-RAR Document 1509 Entered on FLSD Docket 02/17/2023

**RECEIVER, RYAN K. STUMPHAUZER'S TENTH APPLICATION  
FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND  
REIMBURSEMENT OF EXPENSES FOR OCTOBER 1, 2022 – DECEMBER 31, 2022**

11/18/2022	DKR	REVIEWING MOTION TO CORRECT FINAL JUDGMENT FILED BY DEFENDANTS LAFORTE AND MCELHONE	0.10	\$395.00	\$39.50
------------	-----	---	------	----------	---------

Case 9:20-cv-81205-RAR Document 1567 Entered on FLSD Docket 05/17/2023

**RECEIVER, RYAN K. STUMPHAUZER'S ELEVENTH APPLICATION  
FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND  
REIMBURSEMENT OF EXPENSES FOR JANUARY 1, 2023 – MARCH 31, 2023**

3/7/2023	DKR	MULTIPLE CORRESPONDENCE RE: RESPONDING TO REQUESTS FROM FBI; CORRESPONDENCE WITH GJA RE: SAME	0.80	\$395.00	\$316.00
3/7/2023	DKR	CONFERRING WITH RECEIVER RE: POTENTIAL GOVERNMENT INTERVIEW OF PAR EMPLOYEE	0.20	\$395.00	\$79.00

Case 9:20-cv-81205-RAR Document 1663 Entered on FLSD Docket 08/15/2023

**RECEIVER, RYAN K. STUMPHAUZER'S TWELFTH APPLICATION  
FOR ALLOWANCE AND PAYMENT OF PROFESSIONALS' FEES AND  
REIMBURSEMENT OF EXPENSES FOR APRIL 1, 2023 – JUNE 30, 2023**

5/3/2023	DKR	MULTIPLE CORRESPONDENCE WITH TEAM AND U.S. MARSHALS RE: HAVERFORD PROPERTY AND EVICTION ORDERED BY COURT	1.00	\$395.00	\$395.00
----------	-----	--	------	----------	----------

Case 9:20-cv-81205-RAR Document 1663-9 Entered on FLSD Docket 08/15/2023 Page 104 of 294

DATE	INITIALS	DESCRIPTION	HOURS	RATE	FEES
5/3/2023	DKR	MULTIPLE CORRESPONDENCE RE: WRIT OF ASSISTANCE REQUIRED BY U.S. MARSHALS FOR HAVERFORD HOME; CONFERRING WITH MEY RE: SAME	1.00	\$395.00	\$395.00
5/3/2023	DKR	REVIEWING MOTION FILED BY J. LAFORTE RE: CHANGE OF ADDRESS; MULTIPLE CORRESPONDENCE WITH TEAM RE: SAME AND RE: IMPACT ON EVICTION FROM HAVERFORD HOME	1.00	\$395.00	\$395.00
5/4/2023	DKR	MULTIPLE CORRESPONDENCE RE: SURRENDER OF HAVERFORD HOME	0.50	\$395.00	\$197.50
5/11/2023	DKR	MULTIPLE CORRESPONDENCE RE: RECEIVERSHIP PROPERTY IN HAVERFORD, PA AND DEFENDANTS' REQUEST FOR ACCESS TO SAME TO COLLECT PERSONAL PROPERTY	0.50	\$395.00	\$197.50

Case 9:20-cv-81205-RAR Document 1663-9 Entered on FLSD Docket 08/15/2023 Page 179 of 294

DATE	INITIALS	DESCRIPTION	HOURS	RATE	FEES
5/30/2023	DKR	MULTIPLE CORRESPONDENCE WITH GOVERNMENT AND COURT RE: INITIAL APPEARANCE AND PLEA ON BEHALF OF PAR FUNDING	0.80	\$395.00	\$316.00
6/1/2023	DKR	DRAFTING CORRESPONDENCE TO SEC RE: RESULTS OF LAFORTE DETENTION HEARING	0.10	\$395.00	\$39.50
6/1/2023	DKR	CORRESPONDENCE RE: SUBPOENA SERVED UPON LAFORTE AND MCELHONE'S NEW RESIDENCE/APARTMENT COMPLEX	0.10	\$395.00	\$39.50

6/1/2023	DKR	TELEPHONE CONFERENCE WITH GJA AND RECEIVER RE: RESULTS OF JOSEPH LAFORTE'S DETENTION HEARING	0.60	\$395.00	\$237.00
6/1/2023	DKR	ATTENDING DETENTION HEARING FOR JOSEPH LAFORTE; TRAVELING TO AND FROM SAME	2.70	\$395.00	\$1,066.50
5/23/2023	DKR	MULTIPLE CORRESPONDENCE RE: SUPERSEDING INDICTMENT UNSEALED AGAINST PAR FUNDING AND VARIOUS INDIVIDUALS	0.40	\$395.00	\$158.00
5/25/2023	DKR	CORRESPONDENCE RE: INITIAL APPEARANCES FOR DEFENDANTS NAMED IN SUPERSEDING INDICTMENT	0.30	\$395.00	\$118.50

**\*\*\*\*\*Douglas K. Rosenblum (DKR) makes first appearance of record to defend Par Funding**

5/30/2023	DKR	CONFERRING WITH GJA RE: REGARDING INDICTMENT OF CBSG, RESPONSE, AND FIRST APPEARANCE	0.70	\$395.00	\$276.50
5/30/2023	DKR	ATTENDING INITIAL APPEARANCE OF LISA MCELHONE IN FEDERAL COURT RE: SUPERSEDING INDICTMENT; TRAVELING TO AND FROM SAME	1.80	\$395.00	\$711.00