

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 20-CV-81205-RAR**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
NOTICE OF FILING EXHIBIT 1 TO RESPONSE TO
LISA MCELHONE'S MOTION TO LIFT ASSET FREEZE**

Attached as Exhibit 1 is a filing in the criminal case against Lisa McElhone, which provides her current address at 2200 Benjamin Franklin Parkway, Unit 1902, where McElhone currently resides while her husband, Joseph LaForte is currently incarcerated, under a lease commencing in March 2023 for \$9,720 per month plus \$300 in parking costs.

OCTOBER 21, 2023

Respectfully submitted,
By: Amie Riggle Berlin
Amie Riggle Berlin, Esq.
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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL ACTION**

v.

:

JOSEPH LAFORTE : **NO. 20-231**

ORDER

AND NOW, to wit, this day of , it is hereby ORDERED AND DECREED that the defendant JOSEPH LAFORTE’S Motion to Modify Conditions of Release is GRANTED, and he is permitted to reside at 2200 Benjamin Franklin Parkway Unit 1902 west, Philadelphia Pa.

THE HONORABLE JUAN R. SANCHEZ

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL ACTION
		FILED UNDER SEAL
vs.	:	
JOSEPH LAFORTE	:	NO. 20-231

**MOTION TO MODIFY CONDITIONS OF RELEASE PERMITTING
DEFENDANT JOSEPH LAFORTE TO RESIDE AT 2200 BENJAMIN
PARKWAY, UNIT 1902 WEST IN PHILADELPHIA, PA**

Defendant, JOSEPH LAFORTE, by his attorney, BRIAN J. MCMONAGLE, Esquire, hereby moves that this Honorable Court enter an ORDER modifying defendant's conditions of release permitting him to reside at 2200 Benjamin Franklin Parkway, Unit 1902 west, Philadelphia, Pa, and in support thereof avers the following:

1. On October 8, 2020, the Honorable Petrese Tucker issued an order granting Joseph LaForte's pretrial release under a condition that he reside at 568 Ferndale Ave in Haverford, Pa. with his wife, under house arrest. Thereafter, as a result of his outstanding compliance with his conditions of release he was released from house arrest and permitted to leave the house under a condition of curfew.
2. On May 5, 2023, Judge Rodolfo Ruiz, who is presiding over civil litigation brought against Mr. LaForte in the Southern District of Florida issued an order evicting Mr. LaForte and his wife from their Haverford home, requiring them to leave the residence by May 5, 2023, and directed a bankruptcy receiver to take possession of the property.

3. In compliance with this order, Mr. LaForte will leave the Haverford residence and will now reside at 2200 Benjamin Franklin Parkway, Unit 1902 west, in Philadelphia with his wife.
4. Mr. LaForte has notified his pretrial officer of the order and his change of residence, and has been informed that pretrial does not object to the change.
5. Mr. LaForte has dutifully complied with all conditions of release, and respectfully requests that his conditions of pretrial release be modified to permit him to reside at 2200 Benjamin Franklin Parkway, Unit 1902 west, in Philadelphia, with his wife.

WHEREFORE, for all of the foregoing reasons, defendant JOSEPH LAFORTE, requests that the Court grant the instant Motion.

Respectfully Submitted,

/s/ BRIAN J. MCMONAGLE
BRIAN J. MCMONAGLE, ESQUIRE
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CERTIFICATION OF SERVICE

BRIAN J. MCMONAGLE, ESQUIRE, hereby certifies that the Defendant Joseph LaForte's Motion to Modify his Conditions of Release has been electronically filed.

s/s/BRIAN J. MCMONAGLE
BRIAN J. MCMONAGLE, ESQUIRE

DATED: 5/3/23