



RE: Jay Stinson/Fine Food Arts

From Mason A. Higgins <mhiggins@staffordlaw.com>

Date Tue 12/30/2025 3:54 PM

To Mason Becker <mbecker@whitewater-wi.gov>; Jeremiah Thomas <jthomas@whitewater-wi.gov>

Cc Ashwini Rao <arao@whitewater-wi.gov>; Iana A. Vladimirova <ivladimirova@staffordlaw.com>

Hi Mason,

Iana and I have put our heads together on this. We think CDA will likely expend somewhere between \$10,000 and \$16,000 in additional attorney fees to accomplish what I laid out in my previous email. We will, of course, endeavor to be as efficient as we can. The reason that range is as broad as it is boils down to the fact that Mr. Rodriguez is pro se. Unrepresented parties are unpredictable (especially with AI being what it is right now—and given how commonly AI is abused in legal matters).

The next steps we envision taking are:

- Drafting a letter to Mr. Rodriguez explaining the situation to him.
 - He has taken the position that Mr. Stinson is responsible for any debt that accrued against Fine Food before Mr. Rodriguez purchased it. He is mistaken (that is not necessarily what their purchase agreement says). And, in any event, even if Mr. Rodriguez may have a claim for indemnification against Mr. Stinson, that does not defeat CDA's liens on its collateral.
 - The letter will also demand that Mr. Rodriguez not transfer the collateral out of Fine Food—because that would amount to conversion—and that Mr. Rodriguez cooperate in Fine Food recovering its collateral (we have judgment for replevin).
 - If CDA is interested in attempting to settle its money judgment against Fine Food, we could also propose that Mr. Rodriguez make some less-than-full payment to CDA to resolve Fine Food's debt.
 - For example, CDA could propose that, if Fine Food pays CDA's attorney fees (roughly \$21,000), CDA will forgive the remainder of its money judgment (roughly \$36,000) against Fine Food.
 - CDA would still be entitled to file a claim against Mr. Stinson for the outstanding amount under its loan agreements (see below).
- Securing default judgment against Fine Food and KLD on CDA's supplemental claims, to the extent necessary (for example, if we determine that Fine Food has transferred CDA's collateral to KLD or some other entity).
 - Mr. Rodriguez cannot speak for either entity—only an attorney can. So, they will default unless he retains counsel.
- Recovering CDA's collateral and filing a proof of claim in Mr. Stinson's bankruptcy case.
 - We see recovering CDA's collateral as the primary goal here. That ***may*** (but does not necessarily) require some discovery (written questions we would serve on Mr. Rodriguez). If Mr. Rodriguez does not cooperate, we may need to depose him.
 - However, discovery/a deposition may be unlikely as we have no reason to believe CDA's collateral has been moved—right?
 - As my previous email mentioned, we believe we should file a claim in Mr. Stinson's bankruptcy because doing so preserves CDA's rights. For example, if Mr. Stinson

comes into money between now and the conclusion of his bankruptcy, CDA is only entitled to payment on its claim if it files a proof of claim.

We want to stress that the ***hard part*** of recovering on CDA's rights under its loan documents is behind us. We have judgment against Fine Food and the right to recover CDA's collateral (that we just need to tee up/enforce). While we understand that CDA doesn't want to throw good money at bad money, we feel that CDA's efforts this far may be wasted if we do not see this through at least to the point that its collateral is recovered.

Please let me know if you have any questions. I'm more than happy to discuss.

Happy New Year,

STAFFORD ROSENBAUM LLP	Mason A. Higgins (he/him) mhiggins@staffordlaw.com 608.259.2699 Fax. 608.259.2600 222 West Washington Avenue, Suite 900 P.O. Box 1784 Madison, Wisconsin 53701-1784 www.staffordlaw.com Stafford Blogs
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From: Mason Becker <mbecker@whitewater-wi.gov>
Sent: Tuesday, December 16, 2025 12:58 PM
To: Mason A. Higgins <mhiggins@staffordlaw.com>; Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Subject: [External] - RE: Jay Stinson/Fine Food Arts

Mason, thanks for the explanation and additional rationale. I guess one question that might be useful being able to provide to the CDA board: Do you have a rough estimate on how much more additional attorney time will cost for this case?

Sincerely,
Mason T. Becker
Community Development Director
City of Whitewater, WI
mbecker@whitewater-wi.gov
Office: 262.473.0148
Cell: 262.443.4458

From: Mason A. Higgins <mhiggins@staffordlaw.com>
Sent: Friday, December 12, 2025 12:45 PM
To: Mason Becker <mbecker@whitewater-wi.gov>; Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Subject: Re: Jay Stinson/Fine Food Arts

You're making good points, Mason. We certainly don't want to see CDA "throw good money at bad money", as it goes.

Filing a claim in a bankruptcy is a very simple process and would preserve CDA's rights to the extent that Mr. Stinson comes into money or otherwise has more than we think he does. So, while I respect that CDA doesn't want to be heavily involved in Mr. Stinson's bankruptcy, I think filing a claim is prudent.

With respect to Mr. Rodriguez, Fine Food, and KLD, we do already have an order for replevin (against Fine Food) allowing CDA to recover its collateral. That's why we're so keen on identifying where it is and who has possession of it (which shouldn't matter too much; CDA's lien should follow the collateral if it's been transferred--it doesn't really matter whether Mr. Rodriguez wants to return it). So, my recommendation would be to stay the course at least until we can act on the order for replevin and recover CDA's collateral.

At that point, if it looks (as I think it might) that neither Mr. Stinson, Mr. Rodriguez, nor either of the entities is collectible, we can certainly talk through CDA's options to gracefully cut its losses. However, while I completely respect that differing minds may differ, and would be happy to attend a CDA meeting in closed session to discuss and answer questions, it's my opinion that these next steps are prudent and give CDA a chance of benefitting on the work that has already been done—namely, by recovering its collateral.

Like I said, I'm more than happy to discuss further.

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From: Mason Becker <mbecker@whitewater-wi.gov>
Sent: Friday, December 12, 2025 11:24 AM
To: Mason A. Higgins <mhiggins@staffordlaw.com>; Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Subject: [External] - RE: Jay Stinson/Fine Food Arts

Mason, good morning.

I think a concern we are having in this case at this point is that we have already expended, and are continuing to expend, a great deal of financial resources for a relatively small loan amount that we are uncertain we will ever be able to recover. Mr. Stinson's bankruptcy filing adds to this concern.

The past communications from Mr. Rodriguez have also failed to instill in me any assurance

that he will ever return any collateral to the CDA or pay any amount of money owed.

The current CDA board has been determined to pursue these cases whenever possible, which I think is based on past history that warranted scrutiny by the press and public. However, I also want to make sure we are wise in choosing whether or not this case should continue to be pursued.

Sincerely,
Mason T. Becker
Community Development Director
City of Whitewater, WI
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From: Mason A. Higgins <mhiggins@staffordlaw.com>
Sent: Friday, December 12, 2025 11:19 AM
To: Mason Becker <mbecker@whitewater-wi.gov>; Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Subject: Re: Jay Stinson/Fine Food Arts

Hi Mason, Jeremiah,

Thank you for reaching out! Yes, we did receive notice of Mr. Stinson's bankruptcy ahead of last Friday's hearing. For now, CDA's case against specifically Mr. Stinson is stayed. We will file a claim in his bankruptcy (please keep an eye out for notices from his bankruptcy attorney/the bankruptcy court) and will assess whether taking a more aggressive approach would be fruitful.

However, the case is proceeding against Fine Food Arts, Dan Rodriguez, and KLD.

On Friday, the judge granted our motion for approval of CDA's attorney fees. That means \$21,664.50 in attorney fees and \$2,123.30 in costs will be added to CDA's judgement against Fine Food. The judge also granted our request that he order Fine Food, Mr. Rodriguez, and KLD to respond to CDA's supplemental claims. Mr. Rodriguez has already answered. But now that Fine Food and KLD are required to, we can seek default judgment against them to the extent that they fail to respond within 20 days of the Court's order.

As I believe we mentioned in our last status update, CDA's attorney fee motion aside, we see the current phase of the lawsuit as focused on information gathering. Specifically, we plan to engage Mr. Rodriguez in discovery to determine (i) where CDA's collateral is; (ii) who currently has possession of CDA's collateral; and (iii) the circumstances of Mr. Stinson's alleged sale of Fine Food to Mr. Rodriguez.

Once we know more, we will be able to give CDA a clearer picture of its larger strategic options in this case to collect on its loan. On that note, we've got a scheduling conference on Friday, January 23, 2026. So, we should have an idea of the timeline for the next steps of the lawsuit after that date as well.

Please let me know if you have any questions.

Best,

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From: Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Sent: Thursday, December 11, 2025 1:40 PM
To: Mason Becker <mbecker@whitewater-wi.gov>; Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Mason A. Higgins <mhiggins@staffordlaw.com>
Subject: RE: Jay Stinson/Fine Food Arts

Thank you both!

From: Mason Becker <mbecker@whitewater-wi.gov>
Sent: Thursday, December 11, 2025 1:38 PM
To: Iana A. Vladimirova <ivladimirova@staffordlaw.com>; Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Mason A. Higgins <mhiggins@staffordlaw.com>
Subject: [External] - RE: Jay Stinson/Fine Food Arts

Just sent an email on this a couple seconds ago...Jeremiah beat me to the punch!

Sincerely,
Mason T. Becker
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From: Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Sent: Thursday, December 11, 2025 1:36 PM
To: Jeremiah Thomas <jthomas@whitewater-wi.gov>
Cc: Ashwini Rao <arao@whitewater-wi.gov>; Mason A. Higgins <mhiggins@staffordlaw.com>; Mason Becker <mbecker@whitewater-wi.gov>
Subject: RE: Jay Stinson/Fine Food Arts

Thanks Jeremiah. Copying Mason Higgins who can provide an update on the case as he attended the latest hearing. We also received the notice of Stinson's bankruptcy filing.

From: Jeremiah Thomas <jthomas@whitewater-wi.gov>
Sent: Thursday, December 11, 2025 12:57 PM
To: Iana A. Vladimirova <ivladimirova@staffordlaw.com>
Cc: Ashwini Rao <arao@whitewater-wi.gov>
Subject: [External] - Jay Stinson/Fine Food Arts

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Good Afternoon,

Attached is a bankruptcy notice we received in the mail today for Jay Stinson. Just wanted to pass the information along.

Jeremiah Thomas

Comptroller



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From: no-reply <no-reply@whitewater-wi.gov>
Sent: Thursday, December 11, 2025 9:33 AM
To: Jeremiah Thomas <jthomas@whitewater-wi.gov>
Subject: Attached Image