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UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

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Albert L. Peia, Plaintiff )  
-vs- ) CASE NO.  
Richard M. Coan, Coan, Lewendon, )  
Gulliver, and Miltenberger, LLC, )  
John Doe Surety 1, John Doe Insurer 2, )  
John Does 3 – 10, Defendants ) AFFIDAVIT OF ALBERT L. PEIA ,  
----- ADDENDUM TO AFFIDAVIT, AND  
EXHIBITS INCORPORATED BY REFERENCE  
IN SUPPORT OF VERIFIED COMPLAINT

I, Albert L. Peia, residing in Los Angeles, in the State of California, of full age and being duly sworn according to law, hereby state the following facts of my own knowledge under penalty of perjury as follows:

1. On 4-28-05 I received a call from a person who identified herself as an employee of the U.S. Bankruptcy Court for the District of Connecticut, Bridgeport Division, who stated that unbeknownst to me the Chapter 7 bankruptcy Case No. 95-51862 had been closed on October 20, 2004. As such, as of that point in time evidencing an intent not to cure the substantial damages caused to me by defendants' illegal, wrongful, and culpable conduct while concomitantly benefiting RICO co-conspirators/other culpable parties, the damages/causes of action have ripened/crystallized with insurance/surety coverages also applicable as of said date. In accordance with the 5-19-05 Order of Judge Kravitz, U.S.D.C.J., District of Connecticut, as set forth in Exhibit J, plaintiff has sought a criminal referral for defendants' (RICO) crimes as indicated therein. At all times relevant hereto, U.S. GOVERNMENT CO-CONSPIRATORS /EMPLOYEES (CURRENT AND FORMER-JUDICIAL, LEGISLATIVE, AND

**EXECUTIVE)WITH KNOWLEDGE OF CRIMINAL ACTS SET FORTH**

**HEREIN, acted in violation of federal statutes in furtherance of said criminal acts, to obstruct justice, obstruct criminal investigations thereof, retaliate against a witness/victim/informant, commit fraud in cases under Title 11, U.S.C., among other criminal acts set forth with specificity hereinafter.**

**Calls To Defendants Coan, Lewendon, and Miltenberger**

**I Stated that I Needed Information For Purpose of A Proper Affidavit Concerning the following which was articulated to a secretary, by voicemail, and to Timothy Miltenberger in a phone conference as set forth hereinafter. The precise areas that I indicated I believed a court would want to see in such an affidavit given the totality of circumstances (particularly the criminal activity, RICO among other) in this case were articulated to secretarial personnel as messages to be relayed to Miltenberger,**

**voicemail messages to Miltenberger, and in a conversation with Timothy Miltenberger himself , who referred to defendant coan as his “client” (not “partner”) are as follows:**

- **The status of the judgment entered in my favor on or around 9-19-97 by Judge Thompson, United States District Court, District of Connecticut, Docket #3:93cv2065(AWT), copy of which is annexed hereto as Exhibit “A”;**
- **As referenced in the 12-11-97 telephonic examination (I was at the Los Angeles, California office of what I believe was the bankruptcy trustee for this California district – defendant coan was in Connecticut), the status of the David George Swann (DOB: 4-6-60 / self-admitted junkie who had 4 guilty pleas to theft in less than 5 years in California) matter, which was ripe for default and/or judgment, [I had joined the trustee coan as plaintiff and indicated Swann’s familiarity with theft as was so of my business/personal assets making time of the essence in proceeding for recovery (replevin and damages the remedies sought). Defendant coan purposefully/wrongfully had the bankruptcy court dismiss same at the hearing on default saying he would decide whether to bring same];**
- **Anything regarding the Adversary Proceedings which were ripe for the entry of default/default judgment, assets, surplus funds yet unaccounted for, which defendant coan wrongfully/illegally caused dismissal thereof, Exhibit B.**
- **Anything regarding the disposition of the contents of the storage unit in Danbury, Connecticut (including as related in the 12-11-97 telephonic examination what remained of my art collection which I indicated had probably gone up in value);**

- Whether there were any criminal proceedings/referrals for the documented RICO among other criminal acts (which coincidentally caused me damages/harm/injury).

**Not surprisingly, given the integral involvement of said defendants in the criminal activity as herein, no response, clarification, or explanation was forthcoming. The details concerning the calls are set forth immediately hereinafter:**

**1-5-04 I initiated my first call to Coan, Lewendon, Gulliver, & Miltenberger subsequent to the action of the U.S. Supreme Court, the Second Circuit Court of Appeals, and the U.S. District Court for the District of Connecticut, all violative of RICO, having given defendant Coan and subject defendants time to cure, in light of their illegal cover-up. I asked to speak with Timothy Miltenberger and was told by the receptionist that he was not in. I gave my name and phone number and further stated I would call back on Friday, January 9, 2004.**

**1-9-04 I called back on January 9, 2004, was told he was not in, was asked whether I wanted to leave a voicemail message, to which I responded that I needed to speak to him personally concerning an affidavit I would be filing with the court, and set forth the subject areas of concern in such an affidavit. I gave my name and phone number and further stated I would call back on Friday, January 16, 2004.**

**1-16-04** I called back on January 16, 2004, was told he was not in, was asked whether I wanted to leave a voicemail message, to which I responded that I needed to speak to him personally concerning an affidavit I would be filing with the court, and set forth the subject areas of concern in such an affidavit. I gave my name and phone number and further stated I would call back on Friday, January 23, 2004.

**1-23-04** I called back on January 23, 2004, was told he was not in, was asked whether I wanted to leave a voicemail message, to which I responded that I needed to speak to him personally concerning an affidavit I would be filing with the court, and referenced the prior articulated subject areas of concern for such an affidavit. I gave my name and phone number and further stated I would call back on Friday, January 30, 2004.

**1-30-04** I called back on January 30, 2004, was told he was not in, and immediately transferred to Timothy Miltenberger's voicemail wherein I referenced the prior message which the receptionist had indicated had been given to Mr. Miltenberger and briefly reiterated those subject areas of concern for the affidavit.

**2-2-04** I called back on February 2, 2004, was told there had been some kind of a power problem by one who identified herself as a new receptionist, Lisa, and that Timothy Miltenberger had been called into a meeting. I gave my name and phone number and further stated I would call back on Friday, February 6, 2004.

**2-6-04 I called back on February 6, 2004, no one was in and at the prompt I left a voicemail message wherein I referenced the prior messages which the receptionist had indicated had been given to Mr. Miltenberger and briefly reiterated those subject areas of concern for the affidavit.**

**2-13-04 I called back on February 13, 2004 and had occasion to speak with Mr. Miltenberger.**

**I Stated that I Needed Information For Purpose of A Proper Affidavit and articulated the precise areas that I indicated I believed a court would want to see in such an affidavit given the totality of circumstances (particularly the criminal activity, RICO among other) in this case as follows:**

**The status of the judgment entered in my favor on or around 9-19-97 by Judge Thompson, United States District Court, District of Connecticut, Docket #3:93cv2065(AWT), copy of which is annexed hereto as Exhibit “A”;**

**As referenced in the 12-11-97 telephonic examination (I was at the Los Angeles, California office of what I believe was the bankruptcy trustee for this California district – defendant coan was in Connecticut), the status of the David George Swann (DOB: 4-6-60 / self-admitted junkie who had 4 guilty pleas to theft in less than 5 years in California) matter, which was ripe for default and/or judgment, [I had joined the trustee coan as plaintiff and indicated Swann’s familiarity with theft as was so of my business/personal assets making time of the essence in proceeding for recovery (replevin and damages the remedies sought). Defendant coan**

**purposefully/wrongfully had the bankruptcy court dismiss same at the hearing on default saying he would decide whether to bring same];**

**Anything regarding the Adversary Proceedings which were ripe for the entry of default/default judgment, assets, surplus funds yet unaccounted for, which defendant coan wrongfully/illegally caused dismissal thereof, Exhibit B;**

**Anything regarding the disposition of the contents of the storage unit in Danbury, Connecticut (including as related in the 12-11-97 telephonic examination what remained of my art collection which I indicated had probably gone up in value);**

**Whether there were any criminal proceedings/referrals for the documented RICO among other criminal acts (which coincidentally caused me damages/harm/injury).**

**In this phone contact with Miltenberger for which I meticulously made record of his response to my statement of Judge Chatigny, U.S.D.C.J., District of Connecticut, having incorporated in his decision my stated intent to sue defendant coan for which no prior leave of court was to be necessary, Timothy Miltenberger responded that same was his recollection as well, although contrary to the position he had taken in papers filed on behalf of defendant coan, his “client/partner”.**

**I gave my phone number and further stated I would call back on Friday, February 20, 2004.**

**2-20-04 I called back on February 20, 2004 and was told to call back on Monday, February 23, 2004.**

- 2-23-04** I called back on February 23, 2004, and was told that Mr. Miltenberger was not in and I gave my phone number and further stated I would call back on Friday, February 27, 2004.
- 2-27-04** I called back on February 27, 2004, was told he was not in, and I gave my name and phone number for a return call and further stated I would call back on Friday, March 5, 2004 at the same time.
- 3-05-04** I called back on March 5, 2004, and was told that Mr. Miltenberger was not in and that they did not know when he would be back I gave my phone number and further stated I would call back on Friday, March 12, 2004 at the same time.
- 3-12-04** I called back on March 12, 2004, was told he was not in and that he would not be returning for the rest of the day. I gave my name and phone number for a return call and further stated I would call back in one week on Friday, March 19, 2004 and that I needed a response.
- 3-19-04** I called back on March 19, 2004, was told he was on the line and that I should call back in about an hour. I gave my name and phone number for a return call and further stated I would call back in about an hour. I called back a bit over an hour later, was told Mr. Miltenberger was on the line, and stated that I would hold for him. Mr. Miltenberger finally picked up and related to me that his client had not gotten back to him, to which I responded that I would call back in one week.

**3-26-04** I called Timothy Miltenberger on March 26, 2004, was told he was on the line and that I should call back in about twenty minutes. I gave my name and phone number for a return call and further stated I would call back accordingly. I called back about twenty minutes later, was told Mr. Miltenberger was on the line, and to call him back on Monday or Tuesday in the afternoon, to which I responded affirmatively.

**3-29-04** I called Timothy Miltenberger on March 29, 2004, was told he was in court. I gave my name and phone number for a return call and further stated I would call back on Friday, April 2, 2004.

**4-2-04** I called Timothy Miltenberger on April 2, 2004 and was told he was not answering his line. I gave my name and phone number for a return call, also left my new P.O. Box (P.O. Box 862156, Los Angeles, CA 90086) and further stated I would call back on Monday, April 5, 2004.

**4-5-04** I called Timothy Miltenberger on April 5, 2004, and was told he was not in, and to try calling him on Thursday, 4-8-04. I gave my name and phone number for a return call and further stated I would call back on Thursday, April 8, 2004.

**4-8-04** I called Timothy Miltenberger on April 8, 2004, was told he was in conference and to call him back Friday, April 16, 2004, to which I responded affirmatively.

- 4-16-04** I called back on April 16, 2004 and was told he was not in. I left my name and phone number for a return call and further stated I would call back in one week on Friday, April 23, 2004 and that I needed a response.
- 4-23-04** I called Timothy Miltenberger on April 23, 2004 and was told he had stepped out and in response to my query stated he would be back in 15-20 minutes. I called back in about 25 minutes and was told he was not answering his line. I gave my name and phone number for a return call, also left my P.O. Box (P.O. Box 862156, Los Angeles, CA 90086) and further stated I would call back on Friday, April 30, 2004 and that I needed a response.
- 4-30-04** I called back on April 30, 2004, and was immediately transferred to Timothy Miltenberger's voicemail wherein I referenced the prior messages which the receptionist had indicated had been given to Mr. Miltenberger, which I had discussed with him, and as well, left as voicemail messages, briefly referencing those subject areas of concern for the affidavit. I further stated the need for a response for the affidavit, that a resolution of the matter would be wise in light of the substantial illegal activities (of defendants/co-conspirators), that I had diligently kept a record of my calls, and that I would call back in one week.
- 5-7-04** I called Timothy Miltenberger on May 7, 2004 and was told he had left for the day. I left my name and phone number for a return call, also left my P.O. Box (P.O. Box 862156, Los Angeles, CA 90086) and that I needed a response.

**5-10-04** I called Timothy Miltenberger on May 10, 2004 and was told he was out to lunch. I stated that I would call back on Friday, 5-14-04, that I had already begun drafting the papers and that it would take some time and hopefully the matter would resolve, that this was never about being litigious but rather about protecting my interests, and that this would get very nasty (in light of the substantial illegal/fraudulent acts by defendants/co-conspirators). I left my name and phone number for a return call, and also left my P.O. Box (P.O. Box 862156, Los Angeles, CA 90086).

**5-14-04** I called Timothy Miltenberger on May 14, 2004 and was told he was out to lunch. I stated that I had already begun drafting the papers and that their insurer and surety would be John Doe defendants, but that hopefully the matter would resolve since it would be in the best interests of the parties . I left my name and phone number for a return call, and also left my P.O. Box (P.O. Box 862156, Los Angeles, CA 90086).

#### **Wrongful Conduct/Pattern of Racketeering Activity**

**2. Defendants/co-conspirators, at times relevant hereto, said conducted and/or participated in the affairs of an enterprise through a pattern of racketeering activity, affecting and having a nexus to interstate commerce thereby, with the intent to damage and defraud plaintiff and obstruct justice thereby, by reason of which violations of 18 U.S.C. Sections 1961 et seq., plaintiff sustained injury to his property and**

**business. Specifically, Alan Shiff purported Chief Judge at USBC fraudulently misrepresented the date of dismissal of a proceeding over which he himself had presided perpetrating a fraud connected with a case under Title 11 as proscribed in Title 18 U.S.C. Section 1961(1) (D); and further, brought a (retaliatory against a witness/victim/informant violative of Section 1513) spurious contempt proceeding against plaintiff, obstructing justice thereby in violation of Section 1503 (and additionally was without jurisdiction to legitimately do so). Quite simply, he lied (materially false fraudulent representation); knew he lied (scienter); lied with the intention of deceiving; that the lies were relied upon (ie.,government, courts, etc.); said fraud in connection with a case under Title 11 directly causing damage to plaintiff's property and business (and as well to plaintiff's estate and creditors thereof) . Defendants did utilize the mails in perpetrating said fraud (on courts, creditors, plaintiff, etc.) constituting the RICO predicate violation of mail fraud thereby, violative of Section 1341 (discussed infra at paragraph # ). Defendants/co-conspirators utilized false hearing dates to wrongfully dismiss adversary proceedings, defrauding plaintiff and creditors thereby, Exhibit "C", and violative of Section 1503, utilizing the mails in perpetrating said scheme in violation of Section 1341**

**did feloniously remove filed federal court documents for the purpose of defrauding plaintiff, covering up various crimes connected thereto, obstructing justice in violation of Section 1503 thereby, causing damages to plaintiff's property and business. Exhibit "D".**

**3. In addition to the foregoing, federal employee Maryanne Trump (Barry) (and USA thereby) did corrupt the federal judicial process obstructing justice in violation of Section 1503 thereby, and Section 1510 as a consequence thereof, even as substantial sums of (drug) money were being laundered, in violation of Section 1956, through her family's/brothers' casinos by RICO defendants before her, said "quid pro quo" in the form of drug money flows constituted a violation of Section 201 relating to bribery.**

**4. At or around the time of the retaliatory and spurious contempt proceeding, late 1992/early1993 , Trump had "retained" the brother of then U.S. Attorney Christopher Droney, which further discovery may have yielded a similar conclusion consistent with said Trump modus operandi. Federal employee (and then U.S. Trustee, and USA thereby) Hugh Leonard was placed on (bribe) retainer by RICO defendants Dilena and companies, violative of the predicate act of bribery, Section 201, as well as obstructing justice, Section 1503, consistent therewith.**

**5. Facts giving rise to what a trier of fact**

**could reasonably infer from same, particularly when coupled with the similar scenario (a more direct “USA bribe deal”, Section 201) *vis-a-vis* federal employee (and then U.S. Attorney) Sam Allito, federal employee (and then Assistant U.S. Attorney, and USA thereby) who did “cut a bribe deal” (Section 201) and as well, did obstruct justice (Section 1503) by removing/having removed from the Office of the U.S. Attorney documents and/or file concerning drug money laundering (Section 1956) and other federal law violations.**

**6. Jonathon Lacey did, upon information/facts giving rise to what a trier of fact could reasonably infer from same and belief, “cut a bribe deal”(Section 201) and as well, did obstruct justice (Section 1503) by removing from the Office of the U.S. Attorney documents and/or file concerning drug money laundering (Section 1956) and other federal law violations. Federal employees in Virginia (and defendant USA thereby) illegally failed to consummate the Chapter 7 proceeding in Virginia in accordance with law, and for the purpose of defrauding plaintiff (fraud in connection with a case under Title 11), and as well, obstructing justice (Section 1503) thereby, by reason of which plaintiff sustained damage to his property and business (also damaging creditors, and committing bankruptcy fraud thereby).**

**7. Defendant Coan did consistent with the aforesaid perpetrate**

**a fraud (connected with a case under Title 11) upon the estate of plaintiff and purposefully and with the intent to damage plaintiff did cause the dismissal of proceedings, obstructing justice (Section 1503) thereby, by reason of which plaintiff sustained injury to his property and business.**

**and Exhibit "B". The same violations apply to the adversary proceeding concerning junkie and thief, David George Swann (DOB 4-6-60; three guilty pleas to theft in less than 5 years residence in California) who stole (bankruptcy) estate among other assets of plaintiff and against whom default (judgment) was ripe for entry (violations of Sections 1513, 102 and that concerning extortion would also have been appropriate) . Defendant Coan has neither abandoned nor rebrought same, violating Section 1503 and (defrauding) damaging plaintiff thereby.**

**8. The aforesaid defendants also did violate Section 1962(d) by conspiring to violate Section 1962(c) by and during during the course of the conspiracy, consistent with the object of the conspiracy in relation to the overt acts in furtherance thereof, did conspire to commit a fraud in connection with a case under Title 11 and obstruct justice thereby, with knowledge of the commission of predicate acts as set forth herein, were a part of the pattern of racketeering activity by which plaintiff sustained injury to his property by reason of said overt predicate acts.**

**9. Specifically, At all relevant times, defendants Richard M. Coan, Timothy Miltenberger, Whitney Lewendon, and Coan, Lewendon, Gulliver, and Miltenberger, LLC., the United States Bankruptcy Court for the District of Connecticut and the other conspirators associated with this enterprise, conducted or participated, directly or indirectly, in the conduct of this enterprise's affairs through a "pattern of racketeering activity" within the meaning of RICO, 18 U.S.C. § 1961(5), in violation of RICO, 18 U.S.C. § 1962(c). Specifically, Defendant Richard M. Coan, in his capacity as successor plaintiff was ordered by the court to file papers consistent with his capacity and duty as successor plaintiff and Trustee, in a number of adversary proceedings brought by debtor/plaintiff herein for which the entry of default had been requested and the entry of default judgment appropriate inasmuch as proper service had been made with some matters being without defense, ie., properties (outside the state of Connecticut, ie., New Jersey) sold during the pendency of the automatic stay pursuant to §362 of Title 11, U.S.C., unaccounted for substantial funds (in New Jersey) generated from said wrongful acts, theft of personalty/business assets (in California, New Jersey, and Connecticut), loss of rents (in New Jersey, California, and Connecticut), among other causes and damages, including a substantial fraud on debtor/plaintiff herein perpetrated by R.I.C.O. defendants/co-conspirators involved in laundering drug money through the Trump (of New York) casinos (in New Jersey) along with other criminal activities covered by and violative of federal law. All of said matters were meritorious, substantial, some without defense, as well as some for which partial settlements and/or payments had been made. Defendant Richard M. Coan, in his capacity as Trustee, and Coan, Lewendon, Gulliver, and Miltenberger, LLC., thereby, and to cover-up various**

**criminal activities including, *inter alia*, illegal drug money laundering, bribery, fraud, theft, other violations of federal law including §362 of Title 11, U.S.C., and the illegal, wrongful and culpable failure to conclude the 1989 Virginia Chapter 7 proceeding under Title 11 in accordance with federal law, among others, wrongfully, negligently, and culpably failed to file any document whatsoever. Defendant Richard M. Coan, in his capacity as Trustee, and defendant Coan, Lewendon, Gulliver, and Miltenberger, LLC., thereby, along defendants Timothy Miltenberger, Whitney Lewendon have at all times attempted to evade process and avoid culpability and accountability for defendants' wrongful and illegal conduct.**

**10. It should be noted that in conspiring to violate section 1962 (c) by reason of which violations plaintiff sustained injury to his business and property, defendants evinced intent to injure plaintiff and benefit (former) RICO/adversary proceeding defendants, and as well did obstruct justice (and criminal investigations thereof). It should be noted as documented therein that co-conspirator USA has continuously and consistently engaged in innumerable enumerated acts of racketeering activity as set forth in 18 U.S.C. Section(I), most notably subpart (A), viz., dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act), which is chargeable under state law and punishable by imprisonment for more than one year, and the concomitants of said racketeering activity set forth in said subpart, namely, murder, bribery,**

**and extortion. In furtherance thereof, as is relevant herein, USA also has been engaged in and violated the predicate acts of obstruction of justice (Section 1503), obstruction of criminal investigations (Section 1510), laundering of monetary instruments (Section 1956) , use of interstate commerce facilities in the commission of murder-for-hire (Section 1958), obstruction of state or local law enforcement (Section 1511), retaliation against a witness, victim, or informant (Section 1513), subpart (D) as regards the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act), punishable under any law of the United States, and subpart (E) any act which is indictable under the Currency and Foreign Transactions Reporting Act. As set forth and as pertains to paragraph #3 *infra* USA has violated Section 1962 *vis-a-vis* receipt of income through a pattern of racketeering, the investment of same in an enterprise, affecting interstate commerce thereby, causing damage to property and business by reason of said racketeering activity; and, Section 1962 , through a pattern of racketeering activity, acquired an interest in and/or maintained control of an enterprise, affecting interstate commerce thereby, causing damage to property and business by reason of said**

**acquisition of interest in, maintenance of, and/or control of said enterprise.**

**A. Felonious removal of filed federal court documents by federal employees of the bankruptcy court over which Alan Shiff presides, among others; viz., on or about March 4, 1993 a motion to file *nunc pro tunc* pre-trial memoranda was illegally removed from the court file; the courtesy copy delivered by hand said day to defendant Shiff's law secretary who identified himself as 'David' and who indicated same would be given to defendant Shiff that same day, Exhibit "D";**

**B. Fraudulent and otherwise false statements by federal employee, Alan Shiff concerning a dismissal date upon which spurious contempt proceedings were predicated and which caused great damage to plaintiff before said spurious proceedings were dismissed on the government's own motion owing to mistake of fact and law; specifically, on or about January 18, 1993 defendant Shiff did make a false representation regarding the date he dismissed a prior Ch. 13 proceeding of plaintiff stating said date to have been October 8, 1992, upon which a spurious contempt proceeding against plaintiff was predicated (false representation); defendant Shiff knew that said representation was false since he had presided over the hearing on June 3, 1992 when he had dismissed same (which fact**

was ultimately confirmed by counsel on my behalf, Robert Sullivan of Westport, Ct.) (scienter); defendant Shiff intended by his materially (relating to the 180 day bar to refiling a bankruptcy petition but for which there could not have been a contempt charge against plaintiff) false representation to defraud plaintiff by the sums wrongfully and illegally extracted from plaintiff as sanctions imposed by Shiff himself as well as the dismissal of meritorious adversary proceedings for which service had been effected, some of which matters were without defense (intent); the department of justice justifiably (it would be a criminal and impeachable offense for Shiff to have made the materially false representation he had made) relied upon the false representation of Shiff in bringing the contempt action against plaintiff (reliance); plaintiff was damaged not only by the sanctions wrongfully and illegally (extracted) imposed, but as well by dismissal of meritorious adversary proceedings, some without defense, regarding property, both real and personal, surplus funds from purported (wrongful) sales of real property, and substantial money damages owed to plaintiff (causing damage);

C. On or about June 4, 1996, relying upon the false representations of Shiff as set forth in part B, *supra*, the California Bankruptcy Court dismissed a prior Chapter 7 proceeding here in California for which the Section 341a hearing

had already been consummated causing plaintiff damage. It should be noted that Shiff utilized the mails in furtherance of said fraud involving the subject case under Title 11 U.S.C., committing mail fraud thereby, and for the purpose of preventing detection of his own crime and those of other RICO co-conspirators, obstructing justice thereby;

D. On or about August 17, 1987, I initiated a R.I.C.O. action Docket #87-2433 (MTB) in the U.S. District Court, District of New Jersey (the action also included E.R.I.S.A. claims in light of the theft by RICO defendant Dilena of funds from a pension fund to which plaintiff had a fiduciary duty - brought to my attention and confirmed by then bookkeeper Peter Baratta- and other illegal acts relative to a 401K plan for the benefit of employees, although said causes are not part of the instant action). Said matter was transferred to Maryanne Trump, a new appointee to said district court, despite hundreds of thousands of dollars (of drug money being laundered) per month flowing from RICO defendants Dilena and companies through the casinos of Maryanne Trump's brother(s) Donald (and Robert). After conflicting improper decisions (dictated by either loss of said illicit funds or an increase) said matter was stalled and I was constrained to file a Chapter 11 bankruptcy on 5-14-88 since a substantial sum of money was owed to me and sought in said

**action. Said matter was stayed by Magistrate Stanley Chesler owing to said bankruptcy filing. In preparing a motion to recuse Maryanne Trump in or around the summer of 1988 I met with and apprised United States Trustee Hugh Leonard of said illegal activity and sought his office to join in my motion to recuse Trump, which he refused despite the obvious and egregious conflict of interest. Hugh Leonard left his position as U.S. Trustee and joined the firm of Cole, Shotz, and Bernstein) in Hackensack, N.J. with his “central” client with whom he was on retainer being RICO defendants Dilena and companies. Said RICO action was dismissed without prejudice in or around early 1989, upon my best recollection;**

**E. In or around the filing of the RICO action in 1987 I contacted the U.S. Attorney’s office and was scheduled a meeting with Assistant U.S. Attorney Jonathon Lacey at their offices in the federal building in Newark, N.J., upon best recollection in or around late summer, early fall of 1987. I explained the RICO action, the drug money laundering among other illegal activities, and turned over to him supporting documents (relevant documents corroborating substantial sums owed to me and as well, the various illegal activities of said defendants, coincident to “break-ins” at my offices and theft of various documents) were being illegally held by RICO defendants’ lawyers Woodcock,**

**Kingman, and Winkler of Hackensack, N.J.- upon information, they had had a “falling out” with the Dilenas who were contemplating litigation against said firm) .Me indicated they would be reviewed and I would be contacted. After some time had passed, I inquired as to the status of the investigation and forthcoming action from said office. I was told that Lacey was no longer with said office and that no file or documents could be located. I thereupon in or around late 1988, early 1989 delivered by hand a package to Sam Allito, then U.S. Attorney, containing said inculpatory documents, the recipient at his Newark, N.J. office indicating that said documents would be turned over to Sam Allito. I was also told once again that I would be contacted concerning same. After some time had passed my inquiry revealed that Allito had been moved to the Court of Appeals for the Third Circuit and that neither a file nor said documents could be located. I thereupon went to the FBI office in Newark, N.J. where I was “tauntingly greeted” by an agent uninterested in said matter who smirkingly asked me “whether I was going to the disco that night”;**

**F. In filing the subsequent Oh. 13 in 1989 I sought to preserve the interests of the estate and creditors thereof only to find a corrupt Shiff court, and thereupon sought an orderly liquidation of assets (including three real properties in N.J.**

**with substantial equity (approximately \$290,000 based on actual comp.values & bank appraisals)under a chapter 7 proceeding in Virginia, where I had maintained a residence and office, filed in September, 1989, just prior to the dismissal of said Ch. 13 proceeding in Connecticut in September 1989.**

**Said proceeding was not consummated according to law, and (conflic-  
ting) statements that I had been granted a discharge were given to an inquiring creditor who subsequently presented same to the Connecticut bankruptcy court. The RICO action and sums owed to me were listed as assets and were neither abandoned nor was a marshalling of assets and distribution consummated according to law. Said wrongful, negligent, illegal and culpable acts of employees of the United States of America('s) bankruptcy/ federal court (as well as those of New Jersey and Connecticut) have caused my estate and creditors thereof substantial damage;**

**G. A Notice of Federal Tort Claim was served upon then Attorney General Robert Barr via Fedex in late 1991. Having received no response I filed a R.I.C.O. and damage action in the U.S. District Court for the District of Connecticut on April 14, 1992 to preserve (for statute of limitations purposes) my contractual claims for sums owed to me by RICO defendants Dilena and companies and for other causes of action consistent therewith. The Docket # of said case was 92cv0166(TGD)**

and was assigned to Judge T. Gilroy Daley who had handled a substantial organized crime case in said district. Said case was stayed owing to the pending bankruptcy proceeding in the District of Connecticut where the adversary proceedings focused primarily, though not exclusively, on the RICO defendants in light of the substantial amounts involved and the position of same as a substantial asset of the estate. Upon Judge Daley's passing, said matter was transferred in or around 1995 to Judge Alvin Thompson and transferred once again to Judge Janet Bond Arterton in early 1996. Within weeks following the dismissal with prejudice of those matters (among others) set forth in Exhibit "B" annexed hereto, Judge Arterton dismissed the RICO action, Docket # 92cv0166, without prejudice indicating in her Order that (it was her understanding) that said matters were being resolved in the bankruptcy proceeding, viz., case # 95-51862 in the District of Connecticut, further compounding the collusive and corrupt, wrongful, negligent and illegal conduct causing plaintiff substantial damage. This is especially so given the fact that many of the subject defendants were in default on the verified complaints, with some partial settlements effected with some of said defendants;

H. The use by the Shiff court of false and/or conflicting notices of hearing, ie., as set forth in Exhibit "D" is

**another way federal employees acted and conspired to fraudulently conceal the various illegal, wrongful, and tortious acts, including the drug money laundering, theft of surplus funds for distribution to the estate and creditors, as well as theft of property, both real and personal, defrauding plaintiff and creditor's of plaintiff's estate. The San Bernardino Court also similarly used such ploy regarding a hearing noticed for 9-9-95 when in fact same was actually 9-7-95.**

**I. The dismissal with prejudice by Alan Shiff, bankruptcy court judge in the district of Connecticut, of adversary proceedings on 12-5-96, all meritorious including some for which the entry of default/default judgment was appropriate, some without defense, defrauding plaintiff and creditors thereby, in violation of the RICO Act and the commission of a predicate act thereunder; as well as to cover-up said predicate acts and other crimes within the ambit of RICO and under State and Federal, constituting misprision of felony thereby.**

**J. J. Matz in Los Angeles, California, Central District Court Judge, in 1999 did fraudulently misrepresent the record of proceedings, obstructing justice thereby, and to cover-up predicate acts under RICO among other crimes, committing misprision of felony thereby. Said criminal act of Matz would also be characterized as an(y) offense involving fraud connected with a case under Title 11**

U.S.C. within the meaning of Title 18 U.S.C. § 1961(D) and also violative of Title 18 U.S.C. § 1962 thereby, in addition the aforesaid provisions. [FEDEX Corp. is also in contempt of a subpoena regarding transmissions by plaintiff to Attorneys General (former) Barr and Reno for which plaintiff sought sanctions/enforcement].

**11. Inclusion of Defendant Coan's et als' (Professional Liability/Errors and Omissions/Malpractice) Insurer and Surety As John Doe Defendants**

In or around 1997, I became aware of the existence of such coverage, though not the precise details of same.

**12. Specific Crimes of U.S. Government Employees/Contractors/Agents,**

(illegal drug)money laundering[Title 18 U.S.C. § 1956], bankruptcy fraud [Title 18 U.S.C. § 1961(1)(D)], obstruction of justice, [Title 18 U.S.C. § 1503] , offenses involving fraud connected with a case under Title 11 U.S.C. [Title 18 U.S.C. § 1961(1)(D)], extortion[Title 18 U.S.C. § 1951] , mail fraud [Title 18 U.S.C. § 1341], bribery [Title 18 U.S.C. § 201], retaliation against a witness/victim/informant [Title 18 U.S.C. § 1513], and racketeering [Title 18 U.S.C. § 1952], along with other substantive causes sounding in (continuing) negligence/breach of fiduciary duty and Misprision of Felony [Title 18 U.S.C. § 4], fraudulent concealment thereof and contract.

A. Felonious removal of filed federal court documents by federal employees of the bankruptcy court over which Alan Shiff presides, among others; viz., on or about March 4, 1993 a motion to file *nunc pro tunc* pre-trial memoranda was illegally removed

**from the court file; the courtesy copy delivered by hand said day to defendant Shiff's law secretary who identified himself as David and who indicated same would be given to defendant Shiff that same day, Exhibit "E";**

**B. Fraudulent and otherwise false statements by federal employee, Alan Shiff concerning a dismissal date upon which spurious contempt proceedings were predicated and which caused great damage to plaintiff before said spurious proceedings were dismissed on the government's own motion owing to mistake of fact and law; specifically, on or about January 18, 1993 defendant Shiff did make a false representation regarding the date he dismissed a prior Ch. 13 proceeding of plaintiff stating said date to have been October 8, 1992, upon which a spurious contempt proceeding against plaintiff was predicated (false representation); defendant Shiff knew that said representation was false since he had presided over the hearing on June 3, 1992 when he had dismissed same (which fact was ultimately confirmed by counsel on my behalf, Robert Sullivan of Westport, Ct.) (scienter); defendant Shiff intended by his materially (relating to the 180 day bar to refiling a bankruptcy petition but for which there could not have been a contempt charge against plaintiff) false representation to defraud plaintiff by the sums wrongfully and illegally extracted from**

**plaintiff as sanctions imposed by Shiff himself as well as the dismissal of meritorious adversary proceedings for which service had been effected, some of which matters were without defense (intent); the department of justice justifiably (it would be a criminal and impeachable offense for Shiff to have made the materially false representation he had made) relied upon the false representation of Shiff in bringing the contempt action against plaintiff (reliance); plaintiff was damaged not only by the sanctions wrongfully and illegally (extracted) imposed, but as well by dismissal of meritorious adversary proceedings, some without defense, regarding property, both real and personal, surplus funds from purported (wrongful) sales of real property, and substantial money damages owed to plaintiff (causing damage);**

**C. On or about June 4, 1996, relying upon the false representations of defendant Shiff as set forth in part B, supra the California Bankruptcy Court dismissed a prior Chapter 7 proceeding here in California for which the Section 341a hearing had already been consummated causing plaintiff damages.**

**D. On or about August 17, 1987, I initiated a R.I.C.O. action Dkt.#87-2433(MTB) in the U.S. District Court, District of New Jersey(the action also included E.R.I.S.A. claims in light of the theft by RICO defendant Dilena of funds from a pension fund to which plaintiff had a fiduciary duty - brought to my atten-**

tion and confirmed by then bookkeeper Peter Baratta (upon information, they/RICO co-conspirators had Baratta committed to a mental institution) - and other illegal acts relative to a 401K plan for the benefit of employees, although said causes are not part of the instant action).

Said matter was transferred to Maryanne Trump Barry, a new appointee to said district court, despite hundreds of thousands of dollars (of drug money being laundered) per month flowing from RICO defendants Dilena and companies through the casinos of Maryanne Trump Barry's brother(s) Donald (and Robert). After conflicting improper decisions (dictated by either potential loss of said illicit funds or an increase) said matter was stalled and I was constrained to file a Chapter 11 bankruptcy on 5-14-88 since a substantial sum of money was owed to me and sought in said action. Said matter was stayed by Magistrate Stanley Chesler owing to said bankruptcy filing. In preparing a motion to recuse Maryanne Trump Barry in or around the summer of 1988 I met with and apprised United States Trustee Hugh Leonard of said illegal activity and sought his office to join in my motion to recuse Trump Barry, which he refused despite the obvious and egregious conflict of interest. Hugh Leonard left his position as U.S. Trustee and joined the firm of Cole, Shotz, and Bernstein) in Hackensack, N.J. with his "central" client with whom he was on retainer being RICO defendants Dilena and

**companies. Said RICO action was dismissed without prejudice in or around early 1989, upon my best recollection.**

**E. In or around the filing of the RICO action in 1987 I contacted the U.S. Attorney's office and was scheduled a meeting with Assistant U.S. Attorney Jonathon Lacey at their offices in the federal building in Newark, N.J., upon best recollection in or around late summer, early fall of 1987. I explained the RICO action, the drug money laundering among other illegal activities, and turned over to him supporting documents (relevant documents corroborating substantial sums owed to me and as well, the various illegal activities of said defendants, coincident to "break-ins" at my offices and theft of various documents) were being illegally held by RICO defendants' lawyers Woodcock, Kingman, and Winkler of Hackensack, N.J.- upon information, they had had a "falling out" with the Dilenas who were contemplating litigation against said firm) . Lacey indicated they (the documents) would be reviewed and I would be contacted. After some time had passed, I inquired as to the status of the investigation and forthcoming action from said office. I was told that Lacey was no longer with said office and that no file or documents could be located. I thereupon in or around late 1988, early 1989 delivered by hand a package to Sam Allito, then U.S. Attorney, containing said inculpatory documents, the recipient at his Newark, N.J.**

**office indicating that said documents would be turned over to Sam Allito. I was also told once again that I would be contacted concerning same. After some time had passed my inquiry revealed that Allito had been moved to the Court of Appeals for the Third Circuit and that neither a file nor said documents could be located. I thereupon went to the FBI office in Newark, N.J. where I was “tauntingly greeted” by an agent uninterested in said matter who smirkingly asked me “whether I was going to the disco that night”.**

**F. In filing the subsequent Ch. 13 in 1989 I sought to preserve the interests of the estate and creditors thereof only to find a corrupt Shiff court, and thereupon sought an orderly liquidation of assets (including three real properties in N.J. with substantial equity (approximately \$290,000 based on actual comp.values & bank appraisals)under a chapter 7 proceeding in Virginia, where I had maintained a residence and office, filed in September, 1989, just prior to the dismissal of said Ch. 13 proceeding in Connecticut in September 1989. Said proceeding was not consumated according to law, and (conflic-ting) statements that I had been granted a discharge were given to an inquiring creditor who subsequently presented same to the Connecticut bankruptcy court. The RICO action and sums owed to me were listed as assets and were neither abandoned nor was**

**a marshalling of assets and distribution consummated according to law. Said wrongful, negligent, illegal and culpable acts of employees of the United States of America('s) bankruptcy/ federal court (as well as those of New Jersey and Connecticut) have caused my estate and creditors thereof substantial damage;**

**G. A Notice of Federal Tort Claim was served upon then Attorney General Robert Barr via Fedex in late 1991. Having received no response I filed a R.I.C.O. and damage action in the U.S. District Court for the District of Connecticut on April 14, 1992 to preserve (for statute of limitations purposes) my contractual claims for sums owed to me by RICO defendants Dilena and companies and for other causes of action consistent therewith. The Docket # of said case was 92cv0166(TGD) and was assigned to Judge T. Gilroy Daley who had handled a substantial organized crime case in said district. Said case was stayed owing to the pending bankruptcy proceeding in the District of Connecticut where the adversary proceedings focused primarily, though not exclusively, on the RICO defendants in light of the substantial amounts involved and the position of same as a substantial asset of the estate. Upon Judge Daley's passing, said matter was transferred in or around 1995 to Judge Alvin Thompson and transferred once again to Judge Janet Bond Arterton in early 1996. Within weeks following the dismissal**

**with prejudice of those matters (among others) set forth in Exhibit “B” annexed hereto, Judge Arterton dismissed the RICO action, Dkt.# 92cv0166, without prejudice indicating in her Order that (it was her understanding)that said matters were being resolved in the bankruptcy proceeding, viz., case # 95-51862 in the District of Connecticut, further compounding the collusive and corrupt, wrongful, negligent and illegal conduct causing plaintiff substantial damage. This is especially so given the fact that many of the subject defendants were in default on the verified complaints, with some small partial settlements effected with some of said defendants;**

**H. The use by the Shiff (Connecticut Bankruptcy) court of false and/or conflicting notices of hearing, ie., as set forth in Exhibit “C” is another way RICO coconspirators acted and conspired to fraudulently conceal the various illegal, wrongful, and tortious acts, including the drug money laundering, theft of surplus funds for distribution to the estate and creditors, as well as theft of property, both real and personal, defrauding plaintiff and creditor’s of plaintiff’s estate. The San Bernardino Court also similarly used such ploy regarding a hearing noticed for 9-9-95 when in fact same was actually 9-7-95.**

**I. The dismissal with prejudice by Alan Shiff, bankruptcy court judge in the district of Connecticut, of adversary**

proceedings on 12-5-96, all meritorious including some for which the entry of default/default judgment was appropriate, some without defense, defrauding plaintiff and creditors thereby, in violation of the RICO Act and the commission of a predicate act thereunder; as well as to cover-up said predicate acts and other crimes within the ambit of RICO and under State and Federal law, constituting misprision of felony thereby.

J. J. Matz in Los Angeles, California, Central District Court Judge, in 1999 did fraudulently misrepresent the record of proceedings, obstructing justice thereby, and to cover-up predicate acts under RICO among other crimes, committing misprision of felony thereby. [FEDEX Corp. is also in contempt of a subpoena regarding transmissions by plaintiff to Attorneys General (former) Barr and Reno for which plaintiff sought sanctions/enforcement].

### **JUDICIAL, LEGISLATIVE, AND EXECUTIVE**

#### **11. The Illegal Drug-Money-Laundering Through the trump Casinos**

In addition to the foregoing, federal employee Maryanne Trump (Barry) (and USA thereby) did corrupt the federal judicial process obstructing justice in violation of Section 1503 thereby, and Section 1510 as a consequence thereof, even as substantial sums of (drug) money were

being laundered, in violation of Section 1956, through her family's/brothers' casinos by RICO defendants before her, said "quid pro quo" in the form of drug money flows constituted a violation of Section 201 relating to bribery.

**12. Direct U.S. Government/CIA Involvement in the Illegal Drug/**

**Illegal Drug-Money-Laundering Business**

**Affidavits of FBI Agent Taus and CIA Agent Tatum Are Appended hereto as Exhibits "F" and "G", respectively, and incorporated herein by reference thereto.**

**William Barr**

**George H.W. Bush**

**William Jefferson Clinton**

**2<sup>nd</sup> Circuit FBI Agent Affidavit Under Penalty of Perjury Attesting to CIA Involvement in Illegal Drug Trade Among Other Crimes. Exhibit "F".**

**U.S. Senators Arlen Specter, John Kerry, Charles Schumer, among others are apprised. A copy of said affidavit is annexed hereto and incorporated herein by reference thereto.**

**CIA Agent Declaration Under Penalty of Perjury Attesting to the Involvement of the Central Intelligence Agency, Drug Enforcement Administration, the armed forces of the United States, among others, in the illegal drug business Exhibits "G" .**

**William Barr, George H.W. Bush, and William Jefferson Clinton**  
are named as involved, along with Manuel Noriega, Mike Harrari (Israeli “mossad”),  
Joe Fernandez, Oliver North, Buddy Young, Felix Rodriguez, and General Gustavo  
Alvarez.

13. Specific Crimes of U.S. Government are set forth *supra* and *infra* and reiterated  
here.

14. Employees/Contractors/Agents: Judicial, Legislative, and Executive Specific  
Crimes of U.S. Government are set forth *supra* and *infra* and reiterated here.

Federal Employees

- The criminal usa defaulted and covered-up same (among other including RICO crimes, ie., illegal drug-money laundering, (bankruptcy)fraud connected with a case under Title 11, u.s.c., bribery including u.s. attorneys/assistant u.s. attorneys, obstruction of justice, retaliation against a witness/victim/informant, etc.) up with collaboration of the corrupt criminal j. matz, the criminally corrupt 9th circuit, the criminally corrupt u.s. supreme court, the criminally corrupt j. maryanne trump(barry) and j. sam allito of the criminally corrupt 3rd circuit, and the criminally corrupt j. dorsey, j. schiff of the criminally corrupt 2nd circuit (all u.s. "courts" and federally employed criminals/"judges"; and as well, federally employed criminals as "trustee" hugh leonard and independent contractor/u.s. agent/criminal, defendant coan, all of whom should be criminally prosecuted for their clearly documented crimes)

- [page1](#) [page2](#) [page3](#) [page4](#) of transcript are annexed hereto as Exhibit “I”.
- [FBI Agent's Affidavit Attesting to the U.S. Government's Substantial and Continued Involvement in the Illegal Drug Business in the 2nd circuit](#) is annexed hereto as Exhibit “F”.

**15. U.S. Federal judges:**

**It should noted and emphasized that there is no immunity, judicial or otherwise, under the laws as presently written in the u.s. that insulates judges from culpability for their criminal acts.**

**maryanne trump barry, judge, 3rd Circuit u.s. Court of Appeals (former u.s.d.c.j., District of new jersey)**

**RICO**

- **bribery**
- **money laundering (conspiracy)**
- **Obstruction of Justice**

**NON-RICO**

- **Misprision of Felony**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**  
**(samuel alito, former u.s. Attorney for the District of new jersey also now sits on this panel)**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**alan shiff, u.s. Bankruptcy Court judge, District of Connecticut**

**RICO**

- **Fraud Connected With A Case Under Title 11**
- **Retaliating Against A Witness, Victim, Or Informant**
- **Extortion (Hobbs Act, Title 18 U.S.C. Section 1951)**
- **Obstruction of Justice**

**[Title 18, Section 1962(c), Conducting or Participating in the Conduct of an Enterprise through a Pattern of Racketeering Activity in Violation of Title 18, Section 1962 U.S.C.];**

**[Title 18 U.S.C. Section 1962(d), Conspiring to Violate Provisions of Title 18 U.S.C. Section 1962 (a-c)];**

**NON-RICO**

- **Misprision of Felony**

**j. howard matz, u.s. District Court judge, Central District of California**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**peter c. dorsey, u.s. District Court judge, District of Connecticut**

**RICO**

- **Fraud Connected With A Case Under Title 11**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**All nine members of the u.s. supreme court**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**3 Judge panel, 2nd Circuit Court of Appeals**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**3 Judge panel, 9th Circuit Court of Appeals**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**u.s. Attorneys General:**

**William Barr,**

**RICO**

- **bribery**

- **money laundering (conspiracy)**
- **Obstruction of Justice**

**[Title 18, Section 1962(c), Conducting or Participating in the Conduct of an Enterprise through a Pattern of Racketeering Activity in Violation of Title 18, Section 1962 U.S.C.];**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**Janet Reno,**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**John Ashcroft**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**u.s. Attorneys:**

**samuel alito, former u.s. Attorney for the District of new jersey**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**christopher droney former u.s. Attorney for the District of Connecticut,**

**RICO**

- **Bribery**
- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**alejandro mayorkas, former u.s. Attorney for the Central District of California**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**Assistant u.s. Attorneys:**

**jonathon lacey, former assistant u.s. attorney, District of new jersey**

**RICO**

- **Bribery**
- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**robert lester, assistant u.s. attorney, Central District of California**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**deidre martini, assistant u.s. attorney, District of Connecticut**

**RICO**

- **Obstruction of Justice**
- **Extortion (Hobbs Act, Title 18 U.S.C. Section 1951)**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**john hughes, assistant u.s. attorney, District of Connecticut**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**ann nevins, assistant u.s. attorney, District of Connecticut**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**John Durham, assistant u.s. attorney, District of Connecticut**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**Office of the United States Solicitor General (clinton administration)**

**Office of the United States Solicitor General**

**Theodore Olson\***

**\*It is with great reluctance that I am constrained to include reference to Mr. Olsen who I understand to be leaving the Office of Solicitor General in August, 2004. Indeed, I offer my belated condolences in light of his substantial loss. Mrs. Olsen, for whom I had the highest personal regard, was beautiful, gifted, smart, and a consummate author/criminal-clinton-critic. However, he was in receipt of the cd accepted for filing by the 2nd circuit court of appeals and which contained documentary evidence of the crimes which are the gravamen of the instant case.**

**u.s. Trustees:**

**hugh leonard, former u.s. Trustee for the District of new jersey**

### **RICO**

- **bribery**
- **money laundering (conspiracy)**
- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

### **NON-RICO**

- **Misprision of Felony**

(patricia schneider/beary, district of Connecticut – involvement minimal)

**u.s. Contractors/Trustees**

**richard m. coan**

**RICO**

- **Fraud Connected With A Case Under Title 11**
- **Obstruction of Justice**

**[Title 18, Section 1962(c), Conducting or Participating in the Conduct of an Enterprise through a Pattern of Racketeering Activity in Violation of Title 18, Section 1962 U.S.C.];**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962 U.S.C.];**

**NON-RICO**

- **Negligence**
- **Breach of Fiduciary Duty**
- **Misprision of Felony**

**whitney lewendon**

**RICO**

- **Fraud Connected With A Case Under Title 11**
- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**timothy miltonberger**

**RICO**

- **Fraud Connected With A Case Under Title 11**
- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**coan, lewendon, gulliver and miltonberger, LLC**

**RICO**

- **Fraud Connected With A Case Under Title 11**
- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**Members of u.s. Congress**

**orin hatch, u.s. Senator, Utah**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**john ashcroft, former u.s. Senator, Missouri**

**RICO**

- **Obstruction of Justice**

**[Title 18, Section 1962(d), Conspiring to Violate Provisions of Title 18, Section 1962];**

**NON-RICO**

- **Misprision of Felony**

**Sadly, though I believe direct knowledge of these (specific to this case) crimes to be far more widespread on the part of other members of congress (and “higher”), particularly joseph lieberman of Connecticut, and boxer and feinstein of california, the same would not properly be included in this affidavit, but see generally and infra [I did not send documents to them owing to their complicity in and support of the always corrupt/criminal clinton administration and the obvious futility of same (reno,**

etc.), and they were not mentioned in the CIA and FBI Agents' Affidavits Under Penalty of Perjury].

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**FBI Contacts:**

**Documents/documentary evidence delivered by fax, courier, and by hand, as well as in phone conferences to:**

**Louis J. Freeh, (former) Director, Federal Bureau of Investigation**

**Ronald Barndollar, FBI Agent, New Haven, Connecticut**

**Jeff Hayes, FBI Agent, (formerly? of) Long Beach, California**

**Some of the Federal Laws Brazenly and Flagrantly Violated and Apposite in This Case Are Immediately Appended Hereto to Facilitate Review Thereof :**

**[TITLE 18 USC, Sections 1961-1968 \[RICO\];](#)**

**[TITLE 18 USC, Section 4 \[Misprision of Felony\];](#)**

**[TITLE 18 USC, Section 371 \[Conspiracy\];](#)**

**[TITLE 18 USC, Section 201 \[Bribery\];](#)**

**[TITLE 18 USC, Chapter 73 \[Obstruction of Justice\];](#)**

**Annexed Hereto As A Part Hereof And Incorporated Herein In It's Entirety By Reference Thereto Is :**

- **[Rico Statement \(dated April , 2005\)](#)**

The Damages To My Business, Property, and Me Have Been Substantial - (It Should Be Noted That Property Values Have Appreciated Substantially Since 1998, ie., El Segundo, CA, etc., and Which Appreciation Has NOT Been Included In Said Damage Amounts) [Schedule Annexed hereto as Exhibit "H"]

**IN LIGHT OF THE FOREGOING AVERMENTS AS SET FORTH UNDER PENALTY OF PERJURY AND EXHIBITS THERETO, PLAINTIFF HEREBY REQUESTS CRIMINAL REFERRAL OF THE ILLEGAL ACTS OF DEFENDANTS AND CO-CONSPIRATORS AS SET FORTH AND DOCUMENTED HEREIN, AND BY REFERENCE HERETO.**

**SIGNED UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA :**

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**Albert L. Peia, Plaintiff/Affiant**

**Dated: April , 2005**