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Sample of the letter sent to the members of the 2nd Cir. Judicial Council

November 29, 2004

Att. Franci, Deputy to the Judge
Chief Judge Michael B. Mukasey
U.S. District Court, SDNY
500 Pearl Street, Room 2240
New York, NY 10007-1312

Dear Judge Mukasey,

I am addressing you, as a judge with responsibility under 18 U.S.C. §3057(a) for the integrity of the judiciary and as a judge to whom I have previously submitted evidence of judicial wrongdoing linked to a bankruptcy fraud scheme, to respectfully request that you, in compliance with that provision, make a report of that evidence to the Acting U.S. Attorney General so that he may investigate it.

Indeed, the evidence reveals a series of instances for over two years of disregard for the law, rules, and facts by U.S. Bankruptcy Judge John C. Ninfo, II, and other officers and parties in the U.S. Bankruptcy and District Courts, WDNY, so numerous and consistently to my detriment, the only non-local and pro se litigant, as to form a pattern of non-coincidental, intentional, and coordinated wrongdoing. Then evidence emerged of the operation of the most powerful driver of corruption: money!, a lot of money in connection with fraudulent bankruptcy petitions. This results from the concentration of *thousands* of bankruptcy cases in the hands of each of the private standing trustees appointed by the U.S. trustee. They have a financial interest in rubberstamping the approval of all petitions, especially those with the least merits, since petitions confirmed by the court produce fees for the trustees, even a fee stream as a percentage of the debtors' periodic payments to the creditors.

This poses the obvious question of who and what else are being paid by the schemers and what parties outside the scheme, such as myself, are being denied due process of law and caused enormous loss of effort, money, and time, as well as tremendous aggravation as the schemers run their operation for illicit gain or advantage. The accompanying statement shows that under §3057(a) a judge, such as you, need not have evidence that another judge or trustee has committed a crime. Rather, he only needs to have "reasonable grounds for believing that any violation under…laws of the United States relating to insolvent debtors…has been committed." Actually, far from needing any evidence, the judge does not even need a belief in the commission of a violation, for it suffices that he or she may believe "that an investigation should be had in connection with laws of the United States relating to insolvent debtors, [and then the judge] ***shall*** report to the appropriate United States attorney all the facts and circumstances of the case, the names of the witnesses and the offense or offenses believed to have been committed…." [emphasis added]

Just as money corrupts, a lot of money made available when lots of fraudulent bankruptcy petitioners are allowed to repay mere pennies on the dollar corrupts a lot. Hence, to avoid even the appearance of any undue influence and insure the integrity of the investigation, it should not be conducted by U.S. attorneys or FBI agents that are even acquainted, as a result of working in the same area, let alone the same building, with the parties that may be investigated. Thus, I respectfully request that you address your §3057(a) report to the Acting U.S. Attorney General with the recommendation that he appoint investigators from outside Rochester or Buffalo.

Meantime, I look forward to hearing from you.

Sincerely, Dr. Richard Cordero

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REQUEST TO EACH MEMBER OF THE JUDICIAL COUNCIL OF THE 2ND CIRCUIT FOR A JUDICIAL REPORT TO BE MADE UNDER 18 U.S.C. §3057(a) TO THE U.S. ATTORNEY GENERAL THAT AN INVESTIGATION SHOULD BE HAD IN CONNECTION WITH OFFENSES AGAINST UNITED STATES BANKRUPTCY LAWS

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I. Judges' obligation to act on their reasonably grounded belief that an investigation should be had

1. Every United States judge is under an obligation to contribute to the integrity of the judicial

system. This obligation flows, among others, from 18 U.S.C. §3057(a), which provides thus:

> (a) Any judge, receiver, or trustee having reasonable grounds for believing that any violation under chapter 9 of this title or other laws of the United States relating to insolvent debtors, receiverships or reorganization plans has been committed, or that an investigation should be had in connection therewith, ***shall*** report to the appropriate United States attorney all the facts and circumstances of the case, the names of the witnesses and the offense or offenses believed to have been committed.…[emphasis added]

2. Judges remain under this obligation regardless of their disposition of an appeal or motion, and thus, regardless of whether they had jurisdiction over the appeal or a non-final order was the subject of the motion. It follows that they must fulfill that obligation independently of their attitude toward the particular appellant or movant before them, for the obligation is not so conditioned and, in any event, the benefit of fulfilling it inures to the general public. Indeed, judges enhance the public's trust in the importance of and respect for the rule of law when they care to act on their reasonable belief that a violation of federal law has been committed and report their grounds for such belief to the U.S. Attorney or his assistants for investigation.

3. In the case at hand there are reasonable grounds for such belief…and that is all the law requires a judge to have in order for him to make such report: not incontrovertible evidence of the commission of a crime; actually, no evidence at all is required, much less that each individual fact or circumstance of the case constitute a violation of the law. Indeed, §3057(a) does not require any violation of the law to be set out, but it is satisfied if the judge simply have "reasonable grounds for believing…that an investigation should be had". Certainly, the section does not demand the objectivity necessary to meet the standard of probable cause, but merely a subjective belief that rests on grounds that are reasonable.

4. That little is what the law requires of judges for a §3057(a) report to the U.S. Attorney, although given their legal training and experience, they could have been used as filters to assess the sufficiency of evidence to support an indictment and asked that they report only evidence that would survive at arraignment. What is more, judges have both authority to compel a person before them to answer questions and power to compel a litigant and even others to produce evidence and witnesses. Nevertheless, §3057(a) only requires judges to have a reasonably grounded belief in order to report that an investigation should be had. If that is all the law requires of judges, why should they impose any other requirement on a litigant, such as that his

claims meet criminal evidence sufficiency standards, let alone that he submit concrete evidence that a crime was committed, before they would even consider granting a litigant's request for a §3057(a) report?

5. It would be all the more incomprehensible and unwarranted to impose a higher than the §3057(a) requirement on Dr. Cordero, for he has complained from the beginning –in the statement of issues on appeal of May 5, 200*3*, and the appeal brief of July 9, 200*3*- and since then in many of his papers submitted to this Court –as in his recent motion to quash of September 9, 2004, an order of Judge Ninfo- that the judges, trustees, parties, and debtors in this case have unjustifiably denied him the discovery and documentary evidence that he is entitled to. Nevertheless, Dr. Cordero has submitted to this Court detailed descriptions, supported by any documents available, of the many instances in which those people have disregarded legality, concealed or misrepresented the facts, and shown bias against him, the only pro se party and a non-local one to boot.

6. The low threshold set by §3057(a) to trigger a judge's obligation to report his belief in the need for an investigation is not an exception for the benefit of the judges to a normally higher requirement imposed on others. Rather, it is a means for the benefit of the public to satisfy the requirement that justice not only must be done, but must also be seen to be done. Hence, when judges do not have all the evidence to do justice, but have reason to belief that injustice may have been done by somebody's offense or violation of the law, they must ask for an investigation that may gather the necessary evidence for justice to be seen to be done.

7. When judges fail to acquit themselves of their §3057(a) reporting obligation and in so doing give even as little as the appearance of partiality, whether toward their peers or against a litigant, then they trigger another obligation: that of disqualifying themselves so as to make room for another judge that will do justice and be seen to do justice.

8. By contrast, for judges that want to acquit themselves of their §3057(a) reporting obligation, this case presents enough grounds from which their belief can reasonably arise that it should be investigated by the U.S. Attorney General. To that end, it should be sufficient for those judges to look in the most favorable light at the following statement of those grounds in order to see how the totality of circumstances support the belief that at least one offense, or even more offenses, may have been committed and warrant investigation. Where §3057(a) only requires

judges to ask for an investigation, judges should not ask a private citizen to submit the results of an investigation. And just as judges hold litigants to their obligations under the law, judges should hold themselves bound by their obligations under the law, such as that under §3057(a) requiring that they "shall" report their belief that an investigation of offenses against bankruptcy laws should be had.

II. The categories of evidence that raises reasonable suspicion of wrongdoing that should be investigated

9. The evidence of judicial wrongdoing linked to a bankruptcy fraud scheme has accumulated for over two years and is contained or described in a file of over 1,500 pages. Of necessity, only a summary of it can be provided here. Likewise, only the most pertinent documents have been referenced, many of which have already been submitted so that only those updating them have been attached hereto as exhibits; however, all of those included in the Table of Exhibits (19, infra) but not attached, and those referred to in the ones attached are available on request.

10. Yet, this evidentiary summary should be enough, not to establish the commission of a crime, but rather to satisfy the standard of reasonable suspicion applied to the opening of an official investigation. Then it is for those with the duty as well as the necessary legal authority and resources, to call for an investigation and conduct it. Although intertwined, that evidence can be described in a few principal categories:

    1) U.S. Bankruptcy Judge John C. Ninfo, II, and others have protected from discovery, let alone trial, **a)** a trustee sued for negligence and recklessness who had before the Judge some 3,000 cases! –how many do you have?-; **b)** an already defaulted bankrupt defendant against whom an application for default judgment was brought; **c)** parties who have disobeyed his orders, even those that they sought or agreed to; and **d)** debtors who have concealed assets, all to the detriment of Dr. Cordero and while imposing on him burdensome obligations.

    2) David DeLano –a lending industry insider who has been for 15 years and still is a bank *loan* officer- and Mary Ann DeLano are suspected of having filed a fraudulent bankruptcy petition and of engaging, among other things, in concealment of assets; but

they are being protected from examination under oath and from compulsory production of financial documents, all of which could incriminate them and others in the fraud scheme.

3) Chapter 13 Trustee George Reiber and his attorney, James Weidman, Esq., unlawfully conducted and terminated the meeting of creditors of the DeLanos, and Trustee Reiber, with the support of U.S. Trustees Kathleen Schmitt and Deirdre Martini, has since continued to fail his duty to investigate them, for an investigation could incriminate him for having approved at least a meritless and at worst a known fraudulent bankruptcy petition.

A. Reasonable grounds for believing that Judge Ninfo and others have engaged in a pattern of wrongdoing aimed at preventing incriminating discovery and trial

11. Judge Ninfo failed to comply with his obligations under FRCivP 26 to schedule discovery (Exhibit page 1=E-1)[1] in Pfuntner v. [Chapter 7 Trustee Kenneth] Gordon et al, WBNY docket no 02-2230, filed on September 27, 200*2*. As a result, over 90 days later the Judge still lacked the benefit of any discovery whatsoever.

12. By that time, Dr. Cordero had cross-claimed against Trustee Gordon for defamation as well as negligent and reckless performance as trustee and the Trustee had moved for summary judgment. Despite the genuine issues of material fact inherent in such types of claims and raised by Dr. Cordero, the Judge issued an order on December 30, 200*2*, summarily granting the motion of Trustee Gordon, a local litigant and fixture of his court. (E-2§II)

a) Indeed, the statistics on PACER as of November 3, 2003[2,] showed that since April 12, 2000, Trustee Gordon was the trustee in 3,092 cases! However, by June 26, 2004, he had added 291 more cases for a total of 3,383 cases, out of which he had 3,382[3] cases before Judge Ninfo…in addition to the 142 cases prosecuted or defended by Trustee Gordon and 76 cases in which the Trustee was a named party.

13. Could you handle competently such an overwhelming number of cases, increasing at the rate of

[1] Exhibits from pages E-1 through E-134 have already been submitted and their titles appear in the Table of Exhibits, at 19, infra; even so, any of them or the whole set is available on demand. However, exhibits E-83 through E-108 just as E-135 et seq. are provided herewith and are easily identifiable because their references are in bold, i.e. (**E-#**).

[2] https://ecf.nywb.uscourts.gov/cgi-bin/login.pl.

[3] Id.

1.23 new cases per day, every day, including Saturdays, Sundays, holidays, sick days, and out-of-town days, cases in which you personally must review documents and crunch numbers to carry out and monitor bankruptcy liquidations for the benefit of the creditors, whose individual views and requests you must also take into consideration as their fiduciary? If the answer is not a decisive "yes!", it is reasonable to believe that Judge Ninfo knowingly disregarded the probability that Trustee Gordon had been negligent or even reckless, as claimed by Dr. Cordero, and granted the Trustee's motion to dismiss in order not to disrupt their modus operandi and to protect himself from a charge of having failed to realize or tolerated Trustee Gordon's negligence and recklessness in this case…and in how many others of their thousands of cases? There is a need to investigate what is going on between those two…and the others, (cf. E-3§B-E; **E-86§II**).

14. Judge Ninfo denied Dr. Cordero's timely application for default judgment against David Palmer, the owner of Premier, the moving and storage company to be liquidated by Trustee Gordon, WBNY docket no. 01-20692. However, Mr. Palmer had abandoned Dr. Cordero's property; defrauded him of the storage and insurance fees; and failed to answer Dr. Cordero's complaint. In his denial of Dr. Cordero's application for default judgment, Judge Ninfo disregarded the fact that the application was for a sum certain as required under FRCivP 55. Thus, he imposed on Dr. Cordero a Rule 55-extraneous duty to demonstrate loss, requiring him to search for his property and prejudging a successful outcome with disregard for the only evidence available, namely, that his property had been abandoned in a warehouse closed down for a year, with nobody controlling storage conditions because Mr. Palmer had defaulted on his lease, and from which property had been stolen or removed, as charged by Plaintiff Pfuntner!

    a) Judge Ninfo would not compel Bankrupt Owner Palmer to answer Dr. Cordero's claims even though his address is known and he submitted himself to the court's jurisdiction when he filed a voluntary bankruptcy petition. Why did the Judge need to protect Mr. Palmer from even coming to court, let alone having to face the financial consequences of a default judgment, although it was for Mr. Palmer, not for the Judge, to contest such judgment under FRCivP 55(c) and 60(b)? (E-4§§C-D) Their relation must be investigated as well as that between the Judge and other similarly situated debtors and the aid provided therefor by others (E-4§§C-D).

15. At the instigation of Mr. Pfuntner, who said that property had been found in his warehouse that might belong to Dr. Cordero, Judge Ninfo ordered Dr. Cordero to travel from New York City all the way to Avon, outside Rochester, to conduct an inspection of it within a month or the Judge would order its removal at Dr. Cordero's expense to any warehouse in Ontario…that is, the N.Y. county or the Canadian province, the Judge could not care less!

16. Yet, for months Mr. Pfuntner had shown contempt for Judge Ninfo's first order to inspect that property *in his own warehouse*, and neither attended nor sent his attorney nor his warehouse manager to the inspection nor complied with the agreed-upon measures necessary to conduct it, as provided for in the second order that Mr. Pfuntner himself had requested. Though Mr. Pfuntner violated both discovery orders, Judge Ninfo did not hold him accountable for such contempt or the harm caused to Dr. Cordero thereby. So he denied Dr. Cordero any compensation from Mr. Pfuntner and held immune from sanctions his attorney, David D. MacKnight, Esq., a local whose name appeared as attorney in 479 cases as of November 3, 2003, according to PACER. Why does Judge Ninfo need to protect everybody, except Dr. Cordero? (E-5§E; **E-90§III**)

17. The underlying motive for such bias needs to be investigated. To that end, the DeLano case is the starting point because it provides insight into what drives such bias and links the activity of the biased participants into a scheme: money, lots of money! So who are the DeLanos?

B. Reasonable grounds for believing that the DeLano Debtors have engaged in bankruptcy fraud, such as concealment of assets

18. David and Mary Ann DeLano filed their bankruptcy petition under Chapter 13 of the Bankruptcy Code, 11 U.S.C., on January 27, 2004; WBNY docket no. 04-20280 (**E-153**). The values declared in their schedules and the responses provided to required questions are so out of sync with each other that simply common sense, not expertise in bankruptcy law or practice, is enough to raise reasonable suspicion that the petition is meritless and should be reviewed for fraud. (E-57) Just consider the following salient values and circumstances:

    a) Mr. DeLano has been a bank *loan* officer for 15 years! His daily work must include ascertaining the creditworthiness of loan applicants and their ability to repay a loan over its life. He is still employed in that capacity by a major bank, Manufacturers and Traders Trust Bank (M&T Bank). As an expert in the matter of remaining solvent, whose conduct

must be held up to scrutiny against a higher standard of reasonableness, he had to know better than to do the following together with Mrs. DeLano, who until recently worked for Xerox as a specialist in one of its machines, and as such is a person trained to pay attention to detail and to think methodically along a series steps and creatively when troubleshooting a problem.

b) The DeLanos incurred scores of thousands of dollars in credit card debt;

c) carried it at the average interest rate of 16% or the delinquent rate of over 23% for years;

d) during which they were late in their monthly payments at least 232 times documented by even the Equifax credit bureau reports of April and May 2004, submitted incomplete;

e) have ended up owing $98,092 to 18 credit card issuers listed in Schedule F (**E-153 et seq.**);

f) owe also a mortgage of $77,084;

g) but have near the end of their work lives equity in their house of only $21,415;

h) however, in their 1040 IRS forms declared $291,470 in earnings for just the 2001-03 fiscal years;

i) yet claim that after a lifetime of work they have only $2,910 worth of household goods!;

j) the rest of their tangible personal property is just two cars worth a total of $6,500;

k) their cash in hand or on account declared in their petition was only $535;

l) but made to their son a $10,000 loan, which they declared uncollectible and failed to date, for it may be a voidable preferential transfer;

m) claim as exempt $59,000 in a retirement account and $96,111.07 in a 401-k account;

n) but offer to repay only 22¢ on the dollar for just 3 years and without accrual of interest (**E-185**);

o) refused for months to submit any financial statements covering any length of time so that Trustee Reiber moved on June 15, for dismissal for "unreasonable delay" (E-62; E-65§III).

19. A comparison between the few documents that they produced thereafter, that is, some credit card statements and Equifax reports with missing pages (E-64§II), with their bankruptcy petition and the court-developed claims register and creditors matrix revealed debt underreporting, accounts unreporting, and substantial non-accountability for massive amounts of earned and borrowed money. Dr. Cordero pointed up these indicia of fraud in a statement of July 9, 2004,

(E-64§III) opposing Trustee Reiber's motion to dismiss. The DeLanos responded on July 19 by moving to disallow Dr. Cordero's claim. (E-73; E-117§B) How extraordinary! given that:

a) The DeLanos had treated Dr. Cordero as a creditor for six months;

b) They were the ones who listed Dr. Cordero's claim in Schedule F (**E-153 et seq**.)…for good reason because

c) Mr. DeLano has known of that claim against him since November 21, 2002, when Dr. Cordero brought him into Pfuntner v. Gordon et al. as a third-party defendant due to the fact that Mr. DeLano was the loan officer who handled the bank loan to Mr. Palmer for his company, Premier Van Lines, which then went bankrupt! (E-115§A)

20. Extraordinary, for that closes the circuit of relationships between the main parties to the Pfuntner and the DeLano cases. It begs the question: How many of Mr. DeLano's other clients during his long banking career have ended up in bankruptcy and in the hands of Trustees Gordon and Reiber, who as Chapter 7 and 13 *standing* trustees, respectively, are unavoidable? (E-33§II)

21. An impartial observer could reasonably realize that the DeLanos' motion to disallow Dr. Cordero's claim is a desperate attempt to remove belatedly from their case Dr. Cordero, the only creditor that objected to the confirmation of their repayment plan (E-57; **E-185**) and that is insisting on their production of financial documents that can show their concealment of assets, among other things (E-75; E-80**; E-190**). But not Judge Ninfo. He agreed with Dr. Cordero at the July 19 hearing and without objection from the DeLanos' attorney, Christopher Werner, Esq., to issue Dr. Cordero's document production order requested on July 9 (E-69¶31; E-76), whose contents all knew. But after Att. Werner untimely objected (E-79; **E-92§IV**), he refused to even docket it (E-80; **E-84§I; 90§III**) and only issued a watered down version on July 26 of Dr. Cordero's proposed order (E-76; E-81) that he then allowed the DeLanos to disobey by not producing the documents requested in the Judge's order! If not for leverage, what was it issued for?

22. Dr. Cordero moved that the DeLanos be compelled to comply with the production order (**E-98**) and Judge Ninfo reacted by issuing his order of August 30 that suspends all proceedings in the DeLano case until their motion to disallow Dr. Cordero's claim has been determined, *including all appeals*. (**E-107**; E-121§III) That could take years! during which the other 20 creditors are prejudiced by not receiving any payments. But that is as inconsequential to Judge Ninfo as is his duty under 11 U.S.C. §1325(a)(3) to determine whether the DeLanos submitted their petition "by

any means forbidden by law". Why Judge Ninfo disregards his duty and the interests of creditors and the public so as to protect the DeLanos needs to be investigated.

23. By contrast, Judge Ninfo has denied Dr. Cordero the protection to which he is entitled under §1325(b)(1), which entitles a single holder of an allowed unsecured claim to block the confirmation of the debtor's repayment plan; and under §1330(a), which enables any party in interest, even if not a creditor, to have that confirmation revoked if procured by fraud. But that is precisely what Judge Ninfo cannot allow, for if he lets the DeLanos' case go forward concurrently with the determination of their motion to disallow Dr. Cordero's claim, the DeLanos would have to be examined under oath on the stand and at an adjourned meeting of creditors, and Dr. Cordero, as a creditor or a party in interest, could raise objections and examine them. That is risky because the DeLanos, if left unprotected, could talk and incriminate others. Thus, for extra protection of all those at risk, Judge Ninfo stated at the August 25 hearing that until the motion to disallow is decided, no motion or other paper filed by Dr. Cordero will be acted upon. (**cf. E-231¶2**) To afford them protection, Judge Ninfo has gone as far as to deny Dr. Cordero access to judicial process! (E-121§§III-IV) The stakes must be very high!

24. Thus, in his August 30 order (**E-101**) Judge Ninfo required Dr. Cordero to prove his claim against Mr. DeLano, though he cited no legal basis therefor and ignored the legal basis for not doing so. (E-109) Yet, to comply with it, Dr. Cordero requested Mr. DeLano to produce documents (**E-190; E-211**). Mr. DeLano alleged that they were irrelevant to Dr. Cordero's claim against him and produced none. (**E-216**). Dr. Cordero raised a motion (**E-220**) where he discussed the scope of discovery under FRBkrP Rule 7026 and FRCivP Rule 26(b)(1). (**E-223§II**) He argued that he can request discovery not only to prove his claim against Mr. DeLano, but also to defend against the DeLanos' motion to disallow it by showing that it is a blatant attempt to remove him from the case before he can demonstrate that the DeLanos' petition is fraudulent and masks, among other things, concealment of assets.

25. The response to that motion of November 4 was ever so swift: On November 9, Mr. DeLano filed a response denying production of every document requested, alleging them to be irrelevant or not in his possession (**E-228**) and on November 10, without any hearing, Judge Ninfo entered an order stating that "The Cordero Discovery Motion is in all respects denied". (**E-230**) Neither the Judge nor the attorney for Mr. DeLano, Att. Werner, engaged in any legal discussion, much less

cited any legal provision, (cf. E-40-42) for why waste time and effort researching and discussing the law, rules, and facts when the judge is on your side and he has no inhibition about resorting to conclusory statements to achieve his objective: to prevent at all costs Dr. Cordero from discovering information that can link judicial misconduct (E-1) to a bankruptcy fraud scheme. Would you feel proud of having written that order or rather, for standing up for your belief that just and fair process and the integrity of the judiciary require that an investigation should be had?

C. Reasonable grounds for believing that Trustee Reiber and Att. James Weidman have violated bankruptcy law

26. Chapter 13 Trustee Reiber violated his legal obligation under 28 CFR §58.6 to conduct personally the meeting of creditors of David and Mary Ann DeLano, held on March 8, 2004 (**E-149**). Instead, he appointed his attorney, James Weidman, Esq., to conduct it. After all, Trustee Reiber has 3,909[4] *open* cases! He cannot be all the time where he should be.

27. So at the March 8 meeting of creditors, Trustee Reiber's attorney, Mr. Weidman, repeatedly asked Dr. Cordero how much he knew about the DeLanos having committed fraud and when he did not reveal anything, Att. Weidman terminated the meeting although Dr. Cordero had asked only two questions and was the only creditor at the meeting so that there was ample time for him to keep asking questions. Later on that very same day, Trustee Reiber ratified in open court and for the record Att. Weidman's decision, vouched for the DeLanos' honesty, and stated that their petition had been submitted in good faith. (E-40-42)

28. But those were just words, for Trustee Reiber had not asked for any supporting documents from the DeLanos despite his duty to "investigate the financial affairs of the debtor" under 11 U.S.C. §704(4); after Dr. Cordero requested under §704(7) that he do so, Trustee Reiber misled him into believing that he was investigating the DeLanos. (E-65§III) Only after Dr. Cordero asked that he state concretely what kind of investigation he was conducting did the Trustee for the first time, on April 20, 2004, ask for documents, pro forma (E-64§II) and perfunctorily (E-66§IV).

29. Thus, Trustee Reiber merely requested documents relating to only 8 out of the 18 credit cards declared by the DeLanos, only if the debt exceeded $5,000, and for only the last three years out of the 15 years put in play by the Debtors themselves, who claimed in Schedule F (**E-153 et**

[4] As reported by PACER at https://ecf.nywb.uscourts.gov/cgi-bin/login.pl?601512709478669-L_916_0-1 on April 2, 2004.

seq.) that their financial problems related to "1990 and prior credit card purchases". Incredible as it does appear, the Trustee did not ask them to account for the $291,470 earned in just the 2001-03 fiscal years despite having declared to have in hand and on account only $535! (E-66§IV; **E-153 et seq**.)

30. Despite Dr. Cordero's repeated requests that Trustee Reiber hold an adjourned meeting of creditors (**E-187; E-205; E-214)** The Trustee has refused alleging that Judge Ninfo suspended all "court proceedings" until the DeLanos' motion to disallow Dr. Cordero's claim has been finally determined (**E-199**). What an untenable pretense! To begin with, his obligation to hold such meeting flows from 11 U.S.C. §341 for the benefit of the creditors and is not subject to the will of the judge. So much so that §341(c) expressly forbids the judge to "preside at, and attend, any meeting under this section including any final meeting of creditors". What the judge cannot even attend, he cannot order not to take place at all. It follows that a meeting of creditors does not fall among "court proceedings" and was not and could not be suspended by Judge Ninfo. (**E-201**)

31. Trustee Reiber is motivated by self-preservation, not duty, for if the DeLanos' petition were established to be fraudulent, he would be incriminated for having approved it despite its patently suspicious contents. That could lead to his being investigated to determine how many of his other 3,909 cases are also meritless or even fraudulent. Worse yet, if he were removed from the DeLano case, as Dr. Cordero has repeatedly requested of Judge Ninfo and of the U.S. Trustees Schmitt and Martini (E-71¶32; **E-93§V**; **E-210**), he would be suspended from all his other cases under §324; cf. UST Manual vol. 5, Chapter 5-7.2.2. No wonder he has been so flagrantly disingenuous in pretending that he cannot hold a §341 examination of the DeLanos because Judge Ninfo's order does not allow him to. (**E-204; E-205; cf. E-200**)

32. So has been Assistant U.S. Trustee Kathleen Dunivin Schmitt, the supervisor of Private Trustees Reiber and Gordon. Dr. Cordero asked her in writing (**E-210**) and in messages left on her voice mail and with her assistants that she instruct Trustee Reiber to hold a §341 examination of the DeLanos or state why neither she or he will do so. She has failed to return his calls or write to him. Instead, she had an assistant state that she "is planning to contact George Reiber, Esq., so they can coordinate setting up an adjourned meeting of creditors in the [DeLano case]…and will contact you [when she will be in] the office on November 17 to handle court appearances…or prior to it". (**E-213**) However, although she has her office in the same small federal building in Rochester as Bank-

ruptcy Judge Ninfo and the U.S. District Court as well as the U.S. Attorney and the FBI (cf. 16§IV, infra), and she did appear in court on November 17, according to her assistants, and can get a hold of Trustee Reiber there and on the phone, and summon him to her office, she failed to contact Dr. Cordero on that date, prior to it or thereafter, and will not return his messages.

33. Trustee Schmitt has an interest in not letting that examination take place. If Dr. Cordero, as a creditor, examined the DeLanos and found out that their petition was fraudulent, not to mention that Trustee Reiber knew it, and Trustee Reiber were investigated, she too could be investigated for having allowed her Supervisee Reiber –just as she did her Supervisee Gordon- to accumulate thousands of bankruptcy cases that he cannot possibly handle competently, but from each of which he receives a fee. Why? How does she figure that Trustee Reiber could review the bankruptcy petition of each of those 3,909 cases –and Trustee Gordon his 3,383 cases-, ask for and check supporting documents, and monitor the debtors' compliance with the repayment plan *each month for the three to five years that plans last*? How could she expect those trustees to have time to do anything more than rubberstamp petitions and cash in? (14§IIIA, infra) What was she thinking!? Certainly, what she has been doing with those trustees needs to be investigated.

34. So does the kind of supervision that U.S. Trustee for Region 2 Deirdre A. Martini has been or not been exercising over Assistant U.S. Trustee Schmitt. (E-68§V) Dr. Cordero has served on her every paper that he has written in the DeLano case since the unlawful termination of the March 8 meeting of creditors by Trustee Reiber and his attorney, Mr. Weidman; in addition, he has written to her specifically. She has actual and constructive knowledge of the details of this case. In fact, as early as March 17 and without any investigation of the motives for preventing Dr. Cordero from examining the DeLanos, she stated categorically to him that she would not remove Trustee Reiber from the DeLano case, as Dr. Cordero had requested, and that instead she just wanted "closure". How odd, for the case had just gotten started! Then she engaged in deception to avoid sending him information that could allow him to investigate the case on his own. (**E-139¶10**)

35. More recently, Trustee Martini has failed to state, as requested by Dr. Cordero, whether she will ask Trustee Schmitt to instruct Trustee Reiber to hold an examination of the DeLanos at an adjourned meeting of creditors. She too has failed to write to Dr. Cordero thereon as promised in

their phone conversation on November 1, the second one that she has deigned to take from him (**E-210; E-233**), just as Trustee Schmitt failed to contact Dr. Cordero on that subject (**E-213**).

36. Something is not right here…or rather a lot. Why none of them wants Trustee Reiber to investigate the DeLanos and all have countenanced his failure to do so calls for an investigation. No doubt, Mr. DeLano, a loan officer for 15 years, knows and could say too much under examination.

III. The Evidence Points to the Operation of A Bankruptcy Fraud Scheme

A. How a bankruptcy fraud scheme works

37. The above-described few elements of the evidence, when reviewed as a 'totality of circumstances' instead of individually, give rise to the reasonable suspicion that these people are acting, not separately, but rather in a coordinated fashion, with judicial misconduct supporting a bankruptcy fraud scheme. It is utterly unlikely that they began so to act just because Dr. Cordero is a party in the Pfuntner case and a creditor of the DeLanos. What is utterly likely is that these people have worked together on so many thousands of cases that they have developed a modus operandi which disregards legality as well as the interests of creditors and the public at large.

38. Thus, as insiders they know that institutional lenders do not participate in bankruptcy proceedings if their respective stake does not reach their threshold of cost-effective participation. This is particularly so if they are unsecured lenders, which explains why the DeLanos distributed their debt over 18 credit card issuers and did not consolidate. Knowing that, they could not have imagined that Dr. Cordero, a pro se and non-local party without anything remotely approaching an institutional lender's resources, would even attend the meeting of creditors, let alone pursue this case any further. Hence, this should have been another garden variety fraudulent bankruptcy within their scheme, with all creditors as losers and the schemers as winners of something.

39. The incentive to engage in bankruptcy fraud is typically provided by the enormous amount of money that an approved debt repayment plan followed by debt discharge can spare the debtor. That leaves a lot of money to play with, for it is not necessarily the case that the debtor is broke.

40. As for a standing trustee, who is a private professional, not a federal employee, she is appointed under 28 U.S.C. §586(e) for cases under Chapter 13 and is paid 'a percentage fee of the

payments made under the debt repayment plan of each debtor'. Thus, after receiving a petition, the trustee is supposed to investigate the financial affairs of the debtor to determine the veracity of his statements. If satisfied that he deserves bankruptcy relief from his debt burden, the trustee approves his plan and submits it to the court for confirmation. A confirmed plan generates a stream of payments from which the trustee takes her fee. But even before confirmation, money begins to roll in because the debtor must commence to make payments to the trustee within 30 days after filing his plan and the trustee must retain those payments, 11 U.S.C. §1326(b).

41. If the plan is not confirmed, the trustee must return the money paid, less certain deductions, to the debtor. This provides the trustee with an incentive to approve the plan and get it confirmed by the court because no confirmation means no further stream of payments and, hence, no fees for her. To insure her take, she might as well rubberstamp every petition and do what it takes to get the plan confirmed by every officer that can derail confirmation. Cf. 11 U.S.C. §326(b).

42. The trustee would be compensated for her investigation of the petition -if at all, for there is no specific provision therefor- only to the extent of "the actual, necessary expenses incurred", §586(e)(2)(B)(ii). An investigation of the debtor that allows the trustee to require him to pay his creditors another $1,000 will generate a percentage fee for the trustee of $100 (in most cases). Such a system creates the incentive for the debtor to make the trustee skip any investigation in exchange for an unlawful fee of, let's say, $300, which nets her three times as much as if she had sweated over the petition and supporting documents. For his part, the debtor saves $700. Even if the debtor has to pay $600 to make available money to get other officers to go along with his plan, he still comes $400 ahead. To avoid a criminal investigation for bankruptcy fraud, a debtor may well pay more than $1,000. After all, it is not as if he really had no money.

B. Reasonable Grounds For Believing That The Parties Are Operating a Bankruptcy Fraud Scheme

43. Dr. Cordero does not know of anybody paying or receiving an unlawful fee in this case and does not accuse anybody thereof. But he does affirm what he knows:

    a) Trustee Reiber had 3,909 *open* cases on April 2, 2004, according to PACER;

    b) got the DeLanos' petition ready for confirmation by the court without ever requesting a single supporting document;

    c) chose to dismiss the case rather than subpoena the documents requested but not produced;

d) has refused to trace the substantial earnings of the DeLanos'; and

e) after ratifying the unlawful termination of the meeting of creditors, refuses to hold an adjourned one where the DeLanos would be examined under oath, including by Dr. Cordero.

44. Moreover, there is something fundamentally suspicious when:

a) a bankruptcy judge protects bankruptcy petitioners from a default judgment and from having to account for $291,470;

b) allows the local parties to disobey his orders with impunity;

c) before any discovery has taken place, prejudges in his August 30 order of that their motion to disallow Dr. Cordero's claim is not an effort to eliminate him from the case (**E-106**), although he is the only creditor that threatens to expose their bankruptcy fraud scheme (E-121§IV); and

d) yet shields them from discovery by suspending all further process until their motion to disallow Dr. Cordero's claim is finally determined (**E-107**) and agreeing that they may not produce any documents at all, not even those that he ordered them to produce! (E-81)

45. These facts and circumstances support the reasonable suspicion that they have engaged in coordinated conduct aimed at attaining a mutually beneficial objective, that is, a scheme, and that such conduct originates in bankruptcy fraud. Consequently, what the scheme undermines is, not just the legal, economic, and emotional wellbeing of Dr. Cordero…as if anybody cares…but the integrity of judicial process and the bankruptcy system. That constitutes an offense and there are reasonable grounds for believing that it has been committed and that an investigation thereof should be had.

IV. The need for investigators to be unacquainted with any party that may be investigated

46. However, if that investigation is to have any hope of finding and exposing all the ramifications of the vested interests that have developed rather than being suffocated by them, it must be carried out by investigators that do not even know these people. This excludes not only all those that are their colleagues or friends, but also those that are their acquaintances either because they work in the same small federal building, as do the U.S. attorneys and FBI agents, or live in the same small community in Rochester or Buffalo, NY. (**E-135-147**) They too may fear the

consequences of admitting that right under their noses such a scheme developed. Let out-of-towners conduct all aspects of the investigation…starting by subpoenaing the bank account and *debit* card statements of the DeLanos and then examining them under oath, for what a veteran bank loan officer knows could lead to cracking a far-reaching bankruptcy fraud scheme!

V. Relief requested

47. Therefore, Dr. Cordero respectfully requests that you:

a) report for investigation under 18 U.S.C. §3057(a) or any other pertinent provision of law:

1) Premier Van Lines, CA2 docket no. 03-5023;
2) Mr. Palmer's Premier Van Lines case, WBNY docket no. 01-20692;
3) Pfuntner v. Gordon et al., WBNY docket no. 02-2230; and
4) David and Mary Ann DeLano, WBNY docket no. 04-20280;

b) address the report to the Acting U.S. Attorney General with the recommendation that he appoint experienced investigators who are unrelated to and unacquainted with any of the parties that may be investigated in order to insure that they can conduct a zealous, competent, and exhaustive investigation of the nature and extent of the scheme regardless of who is found to be actively participating in it or looking the other way and that to that end, they be from U.S. Attorney or FBI Offices other than those in Rochester and Buffalo, NY, such as those in Washington, D.C. or Chicago.

Respectfully submitted on,

November 29, 2004

Dr. Richard Cordero

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Brooklyn, NY 11208

Dr. Richard Cordero
tel. (718) 827-9521

List of Judges

of the Judicial Council and the Court of Appeals, 2nd Cir.

to whom Dr. Richard Cordero sent his Request of November 29, 2004 for a report to the U.S. Attorney General under 18 U.S.C. §3057(a) of evidence of bankruptcy fraud

---

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TABLE OF EXHIBITS

in support of a

REQUEST

submitted on November 29, 2004

FOR A REPORT TO THE ACTING U.S. ATTORNEY GENERAL UNDER 18 U.S.C. §3057(a) THAT AN INVESTIGATION SHOULD BE HAD IN CONNECTION WITH OFFENSES AGAINST UNITED STATES BANKRUPTCY LAWS

by Dr. Richard Cordero

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I. Documents already submitted, but available on demand

1. Dr. Richard **Cordero**'s judicial misconduct **complaint about** WDNY U.S. Bankruptcy Judge John C. **Ninfo**, II, submitted on **August 11**, and reformatted and **resubmitted** on **August 27**, 2003, to the Chief Judge of the Court of Appeals for the Second Circuit 1

2. Dr. **Cordero**'s **letter** of **February 2**, 2004, to the Hon. John M. Walker, Jr., **Chief Judge** of the Court of Appeals for the Second Circuit, **inquiring** about the status of the complaint **and updating** its supporting evidence 7

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6. Dr. **Cordero**'s **letter** of **June 19**, 2004, to Chief Judge **Walker**, stating that the judicial misconduct **orders** and materials have **not** been made publicly **available**, **as required under** the CA2 **Rules** Governing Complaints against Judicial Officers, and requesting that they be made available to Dr. Cordero for his use before the deadline of July 9 for submitting his petition for review 15

7. **Rule 17(a) and (b)** of the Rules of the Judicial Council of the Second Circuit Governing Complaints against Judicial Officers 16

8. Dr. **Cordero**'s **letter** of **June 30**, 2004, to Chief Judge **Walker**, stating that the Court's **archiving** of all **orders** and other materials **disposing of complaints**, except those for the last three years, constitutes a **violation** of **Rule 17** of the CA2 Rules Governing Misconduct Complaints 19

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12. Clerk **MacKechnie**'s cover **letter** by Deputy **Allen** of **July 16,** 2004, to Dr. Cordero **acknowledging** receipt of his **petition** for review to the Judicial Council, wrongly dating it as of February 13, and **returning** the also unaccepted separate **volume** of exhibits 28

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63. Dr. **Cordero**'s letter of **October 28**, 2004, **to** Trustee **Reiber** providing Trustee Reiber with **dates for** holding the §341 **examination** of the DeLanos and accompanying a..... 214

64. Statement of **Chief Judge** Walker's **recusal** from the Premier Van Lines case..... 215

65. Att. **Werner**'s letter of **October 28**, 2004, **to** Dr. **Cordero** stating that Dr. Cordero's **discovery** demands are largely **irrelevant** to his alleged claim against Mr. DeLano, that Mr. DeLano objects thereto, and that the **DeLanos object** to the demand for discovery of their finances 216

66. Response to **discovery** demand of Richard Cordero-Objection to Claim of Richard Cordero, denying as **not relevant all documents** requested and stating that the item concerning Mr. Palmer is **not in** Mr. DeLano's **possession** 217

67. Trustee **Reiber**'s letter of **November 2**, 2004, **to** Dr. **Cordero** stating that he has **nothing to add** to his position concerning Dr. Cordero's request that the Trustee hold the §341 **examination** of the **DeLanos**..... 219

68. Dr. **Cordero**'s notice of **motion** and supporting brief of **November 4**, 2004, **to enforce** Judge Ninfo's **Order** of August 30, 2004, by ordering Mr. **DeLano** to **produce** the requested documents and declaring that the Order does not and cannot prevent Trustee **Reiber** from holding a §341 **examination of the DeLanos** 220

69. Att. **Werner**'s **statement** of **November 9**, 2004, to the court on behalf of the DeLanos to oppose Cordero [sic] motion regarding **discovery** and request that it **be denied in all respects** 228

70. Judge **Ninfo's Order** of **November 10**, 2004, **denying** in all respects Dr. **Cordero's motion** of November 4 and holding the hearing, noticed for November 17, to be moot 230

71. Dr. **Cordero**'s letter of **November 14**, 2004, **to** Trustee **Martini requesting** that she **send** him the **letter** that she agreed to send him to confirm her position that she will not remove Trustee Reiber and requesting that she **instruct** Trustee **Reiber** to conduct a §341 **examination** of the **DeLanos** 233

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT
THURGOOD MARSHALL UNITED STATES COURTHOUSE
40 Centre Street
New York, New York 10007
212-857-8500

JOHN M. WALKER, JR.
CHIEF JUDGE

ROSEANN B. MACKECHNIE
CLERK OF COURT

December 3, 2004

Mr. Richard Cordero
59 Crescent Street
Brooklyn, NY 11209-1515

In Re: Premier Van Lines, Inc., 03-5023

Dear Mr. Cordero:

I write in response to your letter of November 29, 2004 (enclosed), addressed to Judge Robert D. Sack, which has been forwarded to this office for response.

Our records indicate that the judgment mandate in this appeal was issued on November 8, 2004. Because this Court no longer has jurisdiction over this matter, we can be of no assistance to you at this time.

Very truly yours,
Roseann B. MacKechnie, Clerk of Court

By: Patricia Chin-Allen
Patricia Chin-Allen, Deputy Clerk

Enclosures

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT
THURGOOD MARSHALL UNITED STATES COURTHOUSE
40 Centre Street
New York, New York 10007
212-857-8500

JOHN M. WALKER, JR.
CHIEF JUDGE

ROSEANN B. MACKECHNIE
CLERK OF COURT

December 3, 2004

Mr. Richard Cordero
59 Crescent Street
Brooklyn, NY 11209-1515

In Re: Your Letters of November 29, 2004

Dear Mr. Cordero:

I write in response to the above-referenced letters addressed to Judge James L. Oakes and Judge Rosemary S. Pooler, which have been forwarded to this office for response.

Your appeal *In Re: Premier Van Lines, Inc.*, 03-5023, was mandated and closed. Your judicial misconduct complaints were dismissed and the petitions for review were denied.

Because our records indicate that you have no matter pending before this Court, we can be of no assistance to you at this time.

Very truly yours,
Roseann B. MacKechnie, Clerk of Court

By: Patricia C. Allen
Patricia Chin-Allen, Deputy Clerk

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UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT
THURGOOD MARSHALL UNITED STATES COURTHOUSE
40 Centre Street
New York, New York 10007
212-857-8500

JOHN M. WALKER, JR.
CHIEF JUDGE

ROSEANN B. MACKECHNIE
CLERK OF COURT

December 7, 2004

Mr. Richard Cordero
59 Crescent Street
Brooklyn, NY 11209-1515

In Re: Premier Van Lines, Inc., 03-5023

Dear Mr. Cordero:

I write in response to your letter of November 29, 2004 (enclosed), addressed to Judge Chester J. Straub, which has been forwarded to this office for response.

Our records indicate that the judgment mandate in this appeal was issued on November 8, 2004. Because this Court no longer has jurisdiction over this matter, we can be of no assistance to you at this time.

Very truly yours,
Roseann B. MacKechnie, Clerk of Court

By: Patricia Chin-Allen
Patricia Chin-Allen, Deputy Clerk

Enclosures

SECOND JUDICIAL CIRCUIT OF THE UNITED STATES
UNITED STATES COURTHOUSE
40 FOLEY SQUARE-ROOM 2904
NEW YORK, NEW YORK 10007
(212) 857-8700 PHONE
(212) 857-8680 FACSIMILE

JOHN M. WALKER, JR.
CHIEF JUDGE

KAREN GREVE MILTON
CIRCUIT EXECUTIVE

December 13, 2004

Dr. Richard Cordero
59 Crescent Street
Brooklyn, NY 11208-1515

Re: Docket Numbers 03-8547 and 04-8510

Dear Dr. Cordero:

I am responding to your communications of October 14, 2004 and November 29, 2004. Circuit Judge José A. Cabranes forwarded them to me, in my capacity as Secretary to the Judicial Council.

I reviewed the matters referenced above, which you filed pursuant to 28 U.S.C. § 351. I understand that you are not satisfied with the rulings received; however, you have exhausted your remedies and therefore, you have no further recourse to pursue those matters before the Judicial Council. As I am unable to provide the assistance you request, the papers you submitted to Judge Cabranes are enclosed herein. I advise you to direct your inquiries to other agencies if you feel that they may be of assistance to you.

I trust this information is of assistance to you.

Very truly yours,

Karen Greve Milton
Circuit Executive

KGM/jdk
cc: Hon. José A. Cabranes (w/o encl.)

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UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT
THURGOOD MARSHALL UNITED STATES COURTHOUSE
40 Centre Street
New York, New York 10007
212-857-8500

JOHN M. WALKER, JR.
CHIEF JUDGE

ROSEANN B. MACKECHNIE
CLERK OF COURT

December 29, 2004

Mr. Richard Cordero
59 Crescent Street
Brooklyn, NY 11209-1515

In Re: Your Letter of November 29, 2004

Dear Mr. Cordero:

I write in response to the above-referenced letter addressed to Judge Robert A. Katzmann, which has been forwarded to this office for response.

Your appeal *In Re: Premier Van Lines, Inc.*, 03-5023, was mandated and closed. Your judicial misconduct complaints were dismissed and the petitions for review were denied.

Because our records indicate that you have no matter pending before this Court, we can be of no assistance to you at this time.

Very truly yours,
Roseann B. MacKechnie, Clerk of Court

By: Patricia Chin-Allen
Patricia Chin-Allen, Deputy Clerk

Enclosures

cc: Judge Robert A. Katzmann

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK 11201

CHAMBERS OF
EDWARD R. KORMAN
CHIEF JUDGE

January 27, 2005

Dr. Richard Cordero
59 Crescent Street
Brooklyn, NY 11208-1515

Dear Dr. Cordero:

I have your letter of November 29, 2004. The subject matter of your complaint relates to proceedings in the Western District of New York and as to which I have no personal knowledge. Nevertheless, if you feel the law has been violated, you are free to file a complaint with the United States Attorney Office for the Western District of New York.

Very truly yours,

Edward R. Korman

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UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT
MOTION INFORMATION STATEMENT

Docket Number(s): 03-5023 **In re: Premier et al.**

Motion: For the Court to report this case to the U.S. Attorney General under 18 U.S.C. §3057(a) for investigation

Statement of relief sought: That this Court:

1. Report for investigation under 18 U.S.C. §3057(a) or any other pertinent provision of law:

a) Premier Van Lines, dkt. no. 03-5023, in this Court;
b) Mr. Palmer's Premier Van Lines case, dkt. no. 01-20692, WBNY;
c) Pfuntner v. Gordon et al., dkt. no. 02-2230, WBNY; and
d) David and Mary Ann DeLano, dkt. no. 04-20280, WBNY;

2. Address the report to U.S. Attorney General John Ashcroft with the recommendation that he appoint investigators who are unrelated to and unacquainted with any of the parties and who can conduct a zealous, competent, and exhaustive investigation of the nature and extent of the scheme regardless of who is found to be actively participating in it or looking the other way;

3. Grant Dr. Cordero any other relief that is just and proper.

MOVING PARTY: Dr. Richard Cordero Movant Pro Se 59 Crescent Street Brooklyn, NY 11208-1515 tel. (718) 827-9521; corderoric@yahoo.com	**OPPOSSING PARTY:** See no. 1, above.

Court-Judge/Agency appealed from: Bankruptcy Judge John C. Ninfo II, and District Judge David Larimer

Has consent of opposing counsel been sought? Not applicable

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND INJUNCTIONS PENDING APPEAL

Is oral argument requested? Yes

Argument date of appeal: December 11, 2003

Signature of moving party:

Dr. Richard Cordero

Has service been effected? Yes; proof is attached

Date: November 8, 2004

ORDER

IT IS HEREBY ORDERED that the motion is **GRANTED** **DENIED.**

FOR THE COURT:
Roseann B. MacKechnie, Clerk of Court

Date: _____ **By:** _____

Proof of Service

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