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# EXHIBIT E Criminal Destruction of 11 of JR's Rental Properties

#### A. The Facts

- 1. In furtherance of the above Criminal Conspiracy, in reference to 11 of JR's Rental Properties valued at \$1,400,000, Cadle at a certain point stripped out all of the contents of each of the above 11 Rental Properties, such as all of the furnaces, water heaters, all plumbing, piping, kitchen cabinets, etc.
- 2. After the above, Cadle then abandoned each of the above Rental Properties, rendering them valueless because of the impact of being exposed to

more than seven years of the Northeastern Pennsylvania winters, without any heat inside of them.

- 3. Further, set forth on pages 9 and 10 of the Criminal Complaint are the photos that show the above 11 Rental Properties that were trashed by Cadle.
- 4. For each Rental Property, the first photo shows the condition of the building in 2006, the last year JR managed each of the above Rental Properties and the second photo shows the condition of the same Rental Properties in 2014, with all of the destruction to 9 of the above 11 Rental Properties, which have been boarded up after all of the contents were stripped out of the Rental Properties and sold for salvage value.
- 5. Next, the last 2 Rental Properties of the above 11 Rental Properties, one located at 6 Monroe Street and the other at 31 Academy Street, both in Wilkes-Barre, have since been burned to the ground by fires.
- 6. Because of all of the above destruction of JR's above 9 Rental Properties and the total destruction of the above 2 Rental Properties, JR has suffered a financial loss of more than \$1,400,000.

### B. Criminal Actions by each of the Criminal Defendants

- 1. During 2007-2008, Cadle Trashed 11 Rental Properties Owned by JR, Destroying More Than \$1,400,000 in Value
- 1. Based on the fact that all of the above Rental Properties were trashed by Cadle, while the TCB was the legal owner of the above Rental Properties,

holding each of them as an escrow agent, pending a determination, of the objections to the tax sale filed by JR, as part of 72 PS §5860.607(d), Cadle had absolutely no legal right to have trashed the above 11 Rental Properties by stealing all of the contents, etc., as described above.

- 2. Further, Fogerty, knowing what the legal status was of each of the above Rental Properties, was an accomplice by authorizing Cadle to take the above criminal destructive actions.
- 3. Also, the TCB, holding the above Rental Properties as equitable owner, subject to JR's rights he was asserting in his Petitions to Object, acted illegally by allowing Cadle to trash the above Rental Properties and then abandon the same.
- 4. Further, because the above actions were approved by the TCB, based on advice by Dean, Dean and the TCB were accomplices in the above legal destruction of JR's Rental Properties.

## C. Criminal Actions by Luzerne County and the TCB

1. Luzerne County and the TCB, based on the recommendations they received from Dean, approved all of Dean's criminal actions, allegedly on their behalf.

#### D. Criminal Actions By Shucosky

- 1. Shucosky, as Court Administrator, was to schedule the §607 hearings related to the real estate tax sales procedures, pertaining to JR's 28 Rental Properties.
- 2. Because Shucosky was part of the above Criminal Conspiracy,
  Shucosky never had Judge Brown schedule the above §607 hearings because Cadle
  would lose.
- 3. Therefore, as part of the above Criminal Conspiracy, Shucosky, as Court Administrator, never scheduled the §607 hearings before Judge Brown, which were supposed to have been scheduled within due course after JR received the §607 Notices in September/October of 2009, almost 5 ½ years ago.
- 4. Therefore, because of Shucosky's above corruption and criminal actions, he has refused to schedule the §607 hearings for the above reasons, thereby allowing Cadle to have stolen more than seven years of real estate tax payments that were supposed to go to local governments.