

CRIMINAL COMPLAINT
Demanding over \$19,000,000 in Restitution

COMPLAINANT:
JOSEPH R.
REISINGER, ESQ.



DAMAGES

**Over \$10,000,000 IN ASSETS
STOLEN OR DESTROYED**

INCLUDING:

\$1,300,000 in Tax Money stolen
from the people of Luzerne County
(which caused the burden for those lost
Taxes to fall upon the rest of the
Luzerne County Taxpayers)

11 Buildings Demolished Worth \$1,400,000
(which destroyed the property values
of all other properties in neighborhoods)

17 Buildings worth \$2,500,000 Illegally Sold
by the Luzerne County Tax Claim Bureau
(to the Cadle Criminal Defendants)

OTHER VICTIMS:



**JUDICIAL CRIMINAL
DEFENDANT**

**MICHAEL
SHUCOSKY, ESQ.**



**The Luzerne
County Court
Administrator**

**COUNTY
CRIMINAL DEFENDANTS**

JOHN G. DEAN, ESQ

**ELLIOTT GREENLEAF
& DEAN (Law Firm)**



**CADLE
CRIMINAL DEFENDANTS**

**KEVIN T.
FOGERTY, ESQ**

**DANIEL C.
CADLE**



THE CADLE COMPANY II, INC.



LUZERNE COUNTY



**LUZERNE COUNTY
TAX CLAIM BUREAU**



This Criminal Complaint is being filed with the Attorney General's Office of the Commonwealth of Pennsylvania by Joseph R. Reisinger, the Complainant, and pertains to the six criminal acts by various parties, including a lawyer and a law firm employed by Luzerne County in conjunction with others. Judge Charles Brown ("Judge C. Brown") also participated in some of the above crimes, but his participation in the above will be addressed by a subsequent filing directly with the Pennsylvania Supreme Court.

The criminal conduct of Michael Shucosky ("Shucosky"), as described herein, will also be addressed in a subsequent filing directly with the Pennsylvania Supreme Court.

Summary of the Crimes

- | | |
|---|----------------------------|
| 1. Crime #1 – Cadle Stole, Over a 12-Year Period, the Complainant's Real Estate Tax Escrow Funds of \$1,295,303 | 1,295,303 |
| 2. Crime #2 –Fraudulent Tax Sales of 28 of the Complainant's Rental Properties by the Luzerne County Tax Claim Bureau (the "TCB") in 2008 | 3,900,000 |
| 3. Crime #3 – Fraudulent Purchase From the TCB of 17 of the Complainant's Rental Properties by Cadle in 2011 | 2,500,000 |
| 4. Crime #4 – The Criminal Destruction of 11 of the Complainant's Rental Properties by Cadle | 1,400,000 |
| 5. Crime #5 – 3 Illegal Court Orders Issued by Judge C. Brown, After Each Was Prepared by the Criminal Shucosky | 9,095,303 |
| 6. Crime #6 – Theft of \$1,736,953 of the Complainant's Funds by Cadle Because of Fraud | <u>1,736,953</u> |
| 7. Total Losses because of the above Crimes | <u>\$19,927,559</u> |

Restitution of \$19,927,559 demanded from the Criminal Defendants

Because of all of the losses that the Complainant has suffered because of the above Crimes, the Complainant requests restitution from the Criminal Defendants, jointly and severally, of \$19,927,559 as detailed herein (the “Restitution Funds”).

The Complainant’s son, Kurt, was a graduate of Wyoming Seminary, King’s College and he earned an MBA from NYU’s Graduate School of Business, but because he was an alcoholic, drank himself to death.

Therefore, the Complainant intends to donate all of the Restitution Funds to a non-profit entity that the Complainant will form, in conjunction with the PA Bar Association called “Kurt’s Place,” which will be used to establish an orphanage that will adopt all children born from mothers who were drug or alcohol afflicted while they were pregnant and, therefore, their children were not appropriate for the normal adoption situation.



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A. The Criminal Defendants and Definitions

1. The County Criminal Defendant, Atty. John G. Dean (“Dean”), at all times relevant hereto, (i) was an agent, servant and/or employee of the Luzerne County Tax Claim Bureau, acting as an attorney for the Luzerne County Tax Claim Bureau, and (ii) had a principal place of business at 39 Public Square, Suite 1000, Wilkes-Barre, Luzerne County, Pennsylvania.

2. The County Criminal Defendant, Elliott Greenleaf and Dean (“EG&D”), at all times relevant hereto, is a law firm with its principal place of business at 39 Public Square, Suite 1000, Wilkes-Barre, Luzerne County, Pennsylvania.

3. The County Criminal Defendant, Luzerne County, is duly incorporated within the Commonwealth of Pennsylvania with its principal place of business at the Luzerne County Courthouse, 200 North River Street, Wilkes-Barre, Luzerne County, Pennsylvania.

4. The County Criminal Defendant, the Luzerne County Tax Claim Bureau (the “TCB”) is a department established by Luzerne County, with its principal place of business at the Luzerne County Courthouse, 200 North River Street, Wilkes-Barre, Luzerne County, Pennsylvania.

5. The Cadle Criminal Defendant, Atty. Kevin T. Fogerty (“Fogerty”), at all times relevant hereto, (i) was acting as an attorney for Cadle, and (ii) had a principal place of business at Mill Run Office Center, 1275 Glenlivet Dr., Suite 150, Allentown, Pennsylvania 18106.

6. The Cadle Criminal Defendant, the Cadle Company II, Inc. (“Cadle”) is a corporation duly authorized to do business within the Commonwealth of Pennsylvania, with its principal place of business at 100 North Center Street, Newton Falls, Ohio 44444.

7. The Cadle Criminal Defendant, Daniel C. Cadle (“D. Cadle”), at all times relevant hereto, (i) was the president and owner of Cadle, (ii) was also an agent, servant and/or employee of Cadle, (iii) has totally authorized and controlled all actions of Cadle and all of its agents, servants and employees, and (iv) is an adult individual and a resident of the State of Ohio, with a principal place of business at 100 North Center Street, Newton Falls, Ohio 44444.

8. The Judicial Defendant, Shucosky, is a competent adult individual who, at all times relevant hereto, maintained a principal place of business at the Luzerne County Courthouse, 200 North River Street, Wilkes-Barre, Luzerne County, Pennsylvania.

9. Dean, EG&D, Luzerne County and the TCB are collectively referred to herein as the “County Criminal Defendants.”

10. Fogerty, Cadle and D. Cadle are collectively referred to herein as the “Cadle Criminal Defendants.”

11. Collectively, all of the above named Criminal Defendants are referred to herein as the “Criminal Defendants.”

12. Every action taken by Dean that is alleged herein was done on behalf of the County Criminal Defendants, in furtherance of the criminal conspiracy described herein (the “Criminal Conspiracy”), with all of the other named Criminal Defendants.

13. Finally, every action taken by Fogerty that is alleged herein was done on behalf of the Cadle Criminal Defendants, in furtherance of the Criminal Conspiracy with all of the other named Criminal Defendants.

B. The Crimes Committed by the Criminal Defendants

14. Crime #1: Cadle, as part of the Criminal Conspiracy, stole \$1,295,303 of the Complainant's real estate tax escrow payments that should have been paid to the TCB. \$1,295,303

15. Crime #2: Dean and the TCB, as part of the Criminal Conspiracy, conducted a fraudulent tax sale of the Complainant's 28 "Rental Properties," constituting the theft of \$3,900,000 in properties. \$3,900,000

16. Crime #3: Cadle, as part of the Criminal Conspiracy with the other Criminal Defendants, used \$484,000 from the above stolen funds of \$1,295,303 to illegally purchase 17 of the Complainant's Rental Properties, worth \$2,500,000 from the TCB. \$2,500,000

17. Crime #4: Cadle, as part of the Criminal Conspiracy, intentionally destroyed 11 of the Complainant's Rental Properties by tearing out all the furnaces, hot water heaters, kitchen cabinets, bathroom fixtures and all plumbing, etc. \$1,400,000

18. Crime #5: Judge Brown, as part of the Criminal Conspiracy with Shucosky, Dean and Fogerty, issued three allegedly criminal judicial orders to cover up all of the above thefts. (\$1,295,303 + \$3,900,000 + \$2,500,000 + \$1,400,000) \$9,095,303

19. Crime #6: Cadle never owned the original notes and therefore had no right to any of the debt service payments from the Complainant. \$1,736,953

20. Total \$19,927,559

C. The Schedules Reflecting Unpaid Real Estate Taxes by Cadle for the Twelve-Year Period, Being Years 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014 and 2015.

21. During the above period, Cadle was serving as the escrow agent or as a mortgagee-in-possession of all of the Complainant's 28 Rental Properties and, therefore, had a legal obligation to pay all of the real estate taxes related to the Complainant's 28 Rental Properties and failed to do so.

22. Attached as Exhibit A is the TCB's schedule for each of the Complainant's 28 Rental Properties, which shows (i) that no real estate taxes were paid for any of those 28 Rental Properties for any of the years 2004, 2005, 2006, 2007, 2008, 2009 and 2010, and (ii) that no real estate taxes were paid for 11 of those properties for 2011, 2012, 2013, 2014 and 2015, and the summary of same is as follows:

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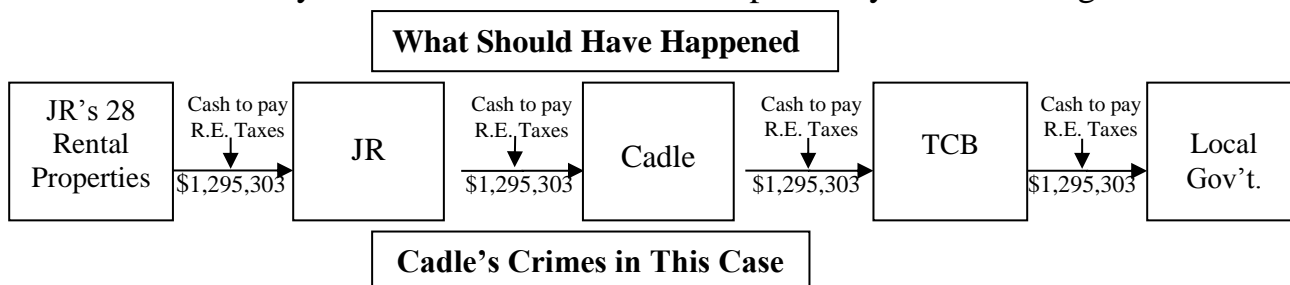
	447 Monument	73 Brazil	845 N. Penn	31 Orchard	51 Susquehanna	58 Marlborough	73 Corlear	54 Gates	75 Butler	67 Union
2004	3,843	2,450	2,743	3,834	2,362	3,431	4,632	3,797	3,090	3,569
2005	3,613	2,306	2,928	3,666	2,219	3,255	4,225	3,629	2,923	3,412
2006	3,841	2,491	3,088	3,804	2,382	3,405	4,347	3,769	3,117	3,601
2007	3,534	2,138	2,709	3,397	2,053	3,013	3,918	3,363	2,753	3,223
2008	3,475	2,080	2,656	3,328	2,021	2,952	3,836	3,294	2,668	3,121
2009	3,831	3,473	4,648	3,081	2,196	4,488	6,210	2,846	3,579	5,152
2010	3,921	2,274	2,698	2,247	1,752	2,106	3,730	2,000	2,376	3,547
2011	1,353	-	-	-	-	-	-	-	931	1,148
2012	-	-	-	-	-	-	-	-	-	-
2013	-	-	-	-	-	-	-	-	-	-
2014 Est.	-	-	-	-	-	-	-	-	-	-
Total	27,411	17,211	21,471	23,357	14,985	22,649	30,899	22,698	21,437	26,774
Interest	20,342	13,000	16,068	18,632	11,733	17,551	23,550	18,250	16,138	19,622
Total w/Interest	47,753	30,212	37,539	41,989	26,718	40,200	54,449	40,947	37,575	46,396

	52 S. Atherton	129 Third	25 Third	85 First	40 W. Center	7 Oak	1-3 Oak	6 Monroe	31 Academy	64 W. Ross
2004	4,687	2,709	2,450	5,319	2,255	2,738	3,320	2,364	4,018	4,765
2005	4,514	2,566	2,311	5,136	2,088	2,565	3,132	2,222	3,972	4,580
2006	4,686	2,770	2,520	5,294	2,371	2,761	3,315	2,408	3,978	4,687
2007	4,268	2,419	2,177	4,859	2,050	2,398	2,931	2,048	3,563	4,242
2008	4,127	2,349	2,116	4,694	2,014	2,363	2,883	2,029	3,487	4,145
2009	4,104	2,277	3,215	5,752	2,589	5,976	3,563	1,740	5,972	6,052
2010	4,074	2,260	2,422	4,522	2,601	4,072	3,504	1,705	2,358	2,738
2011	1,315	741	792	1,457	2,526	1,235	1,066	1,451	367	398
2012	-	-	-	-	-	-	-	1,375	2,111	2,448
2013	-	-	-	-	-	-	-	1,304	1,235	1,341
2014 Est.	-	-	-	-	-	-	-	1,451	2,111	2,448
Total	31,775	18,090	18,002	37,033	18,494	24,106	23,715	20,098	33,172	37,844
Interest	24,119	13,796	13,265	27,896	12,833	16,653	17,563	13,792	24,577	28,147
Total w/Interest	55,894	31,886	31,267	64,929	31,327	40,759	41,279	33,889	57,750	65,991

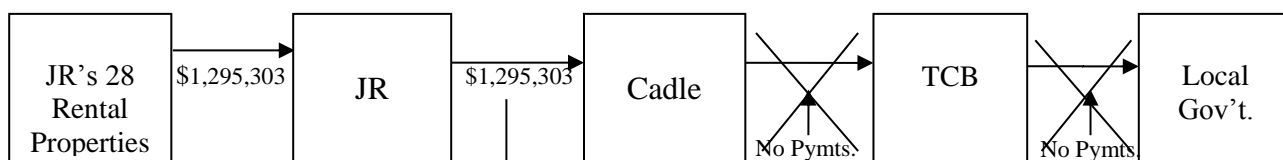
	65 Third Ave	245 St. Clair	244 St. Clair	235 North Main	237 North Main	440 S. Franklin	401 E. Main	22 Sullivan	TOTAL
2004	4,520	1,904	2,183	2,296	2,724	5,982	2,487	3,382	93,852
2005	4,349	1,755	2,043	1,802	2,574	5,775	2,345	3,221	89,124
2006	4,521	1,955	2,234	2,005	2,739	5,699	2,641	3,374	93,805
2007	4,112	1,622	1,889	1,672	2,369	5,214	2,292	2,984	83,209
2008	4,248	1,876	2,133	1,930	2,588	5,090	2,224	2,926	82,652
2009	5,075	2,538	2,911	1,972	2,974	6,217	2,787	2,612	107,831
2010	5,019	2,454	2,836	1,925	3,016	6,073	2,895	666	81,790
2011	4,928	2,379	2,721	1,857	2,744	5,764	3,105	2,981	41,263
2012	4,712	2,230	2,571	2,592	1,881	5,443	1,803	941	28,108
2013	4,475	2,146	2,491	2,633	1,637	3,965	1,704	2,836	25,767
2014 Est.	4,928	2,379	2,721	2,633	2,744	5,764	3,105	2,981	33,265
Total	50,888	23,238	26,734	23,318	27,991	60,986	27,388	28,904	760,666
Interest	31,077	13,808	15,889	13,619	18,091	38,753	17,075	18,798	534,637
Total w/Interest	81,964	37,046	42,622	36,937	46,082	99,739	44,463	47,702	1,295,303

D. Summary of Crimes

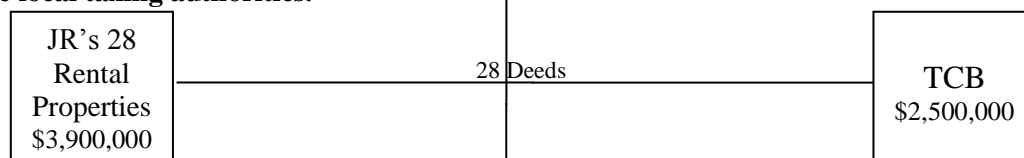
23. A summary of the above six crimes is depicted by the following:



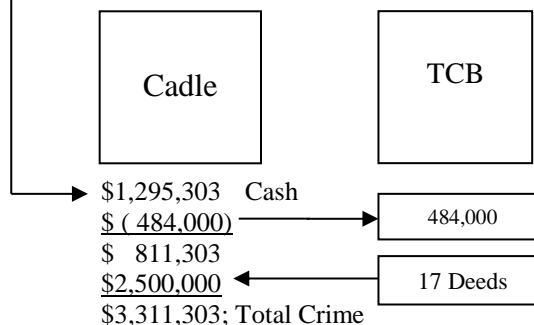
1. **Crime #1:** As described in Exhibit B, Stolen Tax Escrow Funds, a copy attached hereto, Cadle stole all of the Complainant's monthly real estate tax escrow payments totaling 1,295,303 that were made to it, that should have been used by Cadle to pay all of the real estate taxes for the Complainant's 28 Rental Properties during the above twelve-year period.



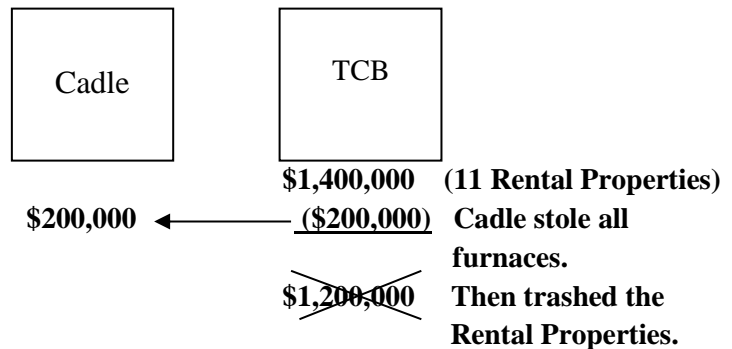
2. **Crime #2:** As described in Exhibit C, 28 Fraudulent Sales, a copy attached hereto, the Complainant's 28 Rental Properties, worth \$3,900,000, were then illegally sold at a fraudulent tax sale arranged by Dean and the TCB, all because the Complainant's real estate taxes allegedly were not paid for the entire above twelve-year period. In fact, Dean and the TCB allowed Cadle to steal all of the Complainant's real estate tax payments, related to the Complainant's 28 Rental Properties, during the above entire seven-year period, instead of requiring Cadle to remit same to the local taxing authorities.



3. **Crime #3:** As described in Exhibit D, Fraudulent Purchase of 17 of the Complainant's Rental Properties, a copy attached hereto, Cadle then used \$484,000 of the above stolen funds, totaling \$1,295,303 from the Complainant's rental income to then illegally purchase 17 of the Complainant's Rental Properties, worth \$2,500,000, from the TCB.



4. **Crime #4:** As described in Exhibit E, Criminal Destruction of 11 of the Complainant's Rental Properties by Cadle, a copy attached hereto, Cadle allegedly trashed 11 of the Complainant's Rental Properties by stealing all of the furnaces, hot water heaters, kitchen cabinets, bathroom fixtures and all plumbing/piping etc., that could be sold for salvage value, and then allowed those 11 abandoned buildings to be destroyed by the elements of weather, leaking roofs, etc., as follows:



2006 Pictures:



Filled with four families

65-67 Third Avenue, Kingston Pa.

2014 Pictures:



Trashed

2006 Pictures:



Filled with five families

235-237 North Main Street, Wilkes-Barre Pa

2014 Pictures:



Trashed



Filled with two families

244-246 St. Clair Street, Wilkes-Barre Pa.



Trashed



Filled with two families

245-247 St. Clair Street, Wilkes-Barre Pa.



Trashed



Filled with one family
6 Monroe Street, Wilkes-Barre, Pa.



Burned to the ground



Filled with eight students



Burned to the ground
31 Academy Street, Wilkes-Barre. Pa.



Filled with six families



Trashed

440-442 South Franklin Street, Wilkes-Barre Pa.



Filled with five families



Trashed

Sullivan Street, Wilkes-Barre Pa.



Filled with three families



Trashed

West Ross Street, Wilkes-Barre Pa.



Filled with four families



Trashed

401-403 East Main Street, Plymouth Pa.

5. Crime #5: As described in Exhibit F, Fraudulent Court Orders, a copy attached hereto, Judge Charles Brown issued 3 fraudulent court orders, in furtherance of the above Criminal Conspiracy, with the assistance of Shucosky, Dean and Fogerty.

6. Crime #6: Cadle never owned any of the original notes, related to the Complainant's above 28 Rental Properties, and therefore never had a legal right to any of the principal payments from October 2004, to current date, totaling \$1,736,953, that was stolen from the Complainant's Rental Properties net rental income, and set forth below is the calculation of the principal payments that were stolen by Cadle, plus interest to current date:

	1	2	3	4	5	6	7
Month	Fraudulent Mortgage Payment Amount	Interest (7%) on Current Balance	Current Payment Plus Interest \$	Previous Balance	Interest (7%) on Previous Balance	Previous Balance Plus Interest	Total Cumulative Balance
11/04	\$ 9,750.00	\$ 56.88	9,806.88	\$ -	\$ -	\$ -	\$ 9,806.88
12/04	9,750.00	56.88	9,806.88	9,806.88	57.21	9,864.08	19,670.96
01/05	9,750.00	56.88	9,806.88	19,670.96	114.75	19,785.70	29,592.58
02/05	9,750.00	56.88	9,806.88	29,592.58	172.62	29,765.20	39,572.08
03/05	9,750.00	56.88	9,806.88	39,572.08	230.84	39,802.91	49,609.79
04/05	9,750.00	56.88	9,806.88	49,609.79	289.39	49,899.18	59,706.05
05/05	9,750.00	56.88	9,806.88	59,706.05	348.29	60,054.34	69,861.22
06/05	9,750.00	56.88	9,806.88	69,861.22	407.52	70,268.74	80,075.61
07/05	9,750.00	56.88	9,806.88	80,075.61	467.11	80,542.72	90,349.60
08/05	9,750.00	56.88	9,806.88	90,349.60	527.04	90,876.64	100,683.51
09/05	9,750.00	56.88	9,806.88	100,683.51	587.32	101,270.83	111,077.71
10/05	9,750.00	56.88	9,806.88	111,077.71	647.95	111,725.66	121,532.53
11/05	9,750.00	56.88	9,806.88	121,532.53	708.94	122,241.47	132,048.35
12/05	9,750.00	56.88	9,806.88	132,048.35	770.28	132,818.63	142,625.51
01/06	9,750.00	56.88	9,806.88	142,625.51	831.98	143,457.49	153,264.36
02/06	9,750.00	56.88	9,806.88	153,264.36	894.04	154,158.41	163,965.28
03/06	9,750.00	56.88	9,806.88	163,965.28	956.46	164,921.75	174,728.62
04/06	9,750.00	56.88	9,806.88	174,728.62	1,019.25	175,747.87	185,554.75
05/06	9,750.00	56.88	9,806.88	185,554.75	1,082.40	186,637.15	196,444.02
06/06	9,750.00	56.88	9,806.88	196,444.02	1,145.92	197,589.95	207,396.82
07/06	9,750.00	56.88	9,806.88	207,396.82	1,209.81	208,606.64	218,413.51
08/06	9,750.00	56.88	9,806.88	218,413.51	1,274.08	219,687.59	229,494.47
09/06	9,750.00	56.88	9,806.88	229,494.47	1,338.72	230,833.18	240,640.06
10/06	9,750.00	56.88	9,806.88	240,640.06	1,403.73	242,043.79	251,850.67
11/06	9,750.00	56.88	9,806.88	251,850.67	1,469.13	253,319.80	263,126.67
12/06	9,750.00	56.88	9,806.88	263,126.67	1,534.91	264,661.58	274,468.45
01/07	9,750.00	56.88	9,806.88	274,468.45	1,601.07	276,069.52	285,876.39
02/07	9,750.00	56.88	9,806.88	285,876.39	1,667.61	287,544.00	297,350.88
03/07	9,750.00	56.88	9,806.88	297,350.88	1,734.55	299,085.43	308,892.30
04/07	9,750.00	56.88	9,806.88	308,892.30	1,801.87	310,694.17	320,501.05
05/07	9,750.00	56.88	9,806.88	320,501.05	1,869.59	322,370.64	332,177.51
06/07	9,750.00	56.88	9,806.88	332,177.51	1,937.70	334,115.21	343,922.09
07/07	9,750.00	56.88	9,806.88	343,922.09	2,006.21	345,928.30	355,735.18
08/07	9,750.00	56.88	9,806.88	355,735.18	2,075.12	357,810.30	367,617.17
09/07	9,750.00	56.88	9,806.88	367,617.17	2,144.43	369,761.61	379,568.48

10/07	9,750.00	56.88	9,806.88	379,568.48	2,214.15	381,782.63	391,589.51
11/07	9,750.00	56.88	9,806.88	391,589.51	2,284.27	393,873.78	403,680.65
12/07	9,750.00	56.88	9,806.88	403,680.65	2,354.80	406,035.46	415,842.33
01/08	9,750.00	56.88	9,806.88	415,842.33	2,425.75	418,268.08	428,074.95
02/08	9,750.00	56.88	9,806.88	428,074.95	2,497.10	430,572.06	440,378.93
03/08	9,750.00	56.88	9,806.88	440,378.93	2,568.88	442,947.81	452,754.69
04/08	9,750.00	56.88	9,806.88	452,754.69	2,641.07	455,395.75	465,202.63
05/08	9,750.00	56.88	9,806.88	465,202.63	2,713.68	467,916.31	477,723.19
06/08	9,750.00	56.88	9,806.88	477,723.19	2,786.72	480,509.90	490,316.78
07/08	9,750.00	56.88	9,806.88	490,316.78	2,860.18	493,176.96	502,983.84
08/08	9,750.00	56.88	9,806.88	502,983.84	2,934.07	505,917.91	515,724.78
09/08	9,750.00	56.88	9,806.88	515,724.78	3,008.39	518,733.18	528,540.05
10/08	9,750.00	56.88	9,806.88	528,540.05	3,083.15	531,623.20	541,430.08
11/08	9,750.00	56.88	9,806.88	541,430.08	3,158.34	544,588.42	554,395.30
12/08	9,750.00	56.88	9,806.88	554,395.30	3,233.97	557,629.27	567,436.14
01/09	9,750.00	56.88	9,806.88	567,436.14	3,310.04	570,746.19	580,553.06
02/09	9,750.00	56.88	9,806.88	580,553.06	3,386.56	583,939.62	593,746.50
03/09	9,750.00	56.88	9,806.88	593,746.50	3,463.52	597,210.02	607,016.89
04/09	9,750.00	56.88	9,806.88	607,016.89	3,540.93	610,557.82	620,364.70
05/09	9,750.00	56.88	9,806.88	620,364.70	3,618.79	623,983.49	633,790.37
06/09	9,750.00	56.88	9,806.88	633,790.37	3,697.11	637,487.48	647,294.35
07/09	9,750.00	56.88	9,806.88	647,294.35	3,775.88	651,070.24	660,877.11
08/09	9,750.00	56.88	9,806.88	660,877.11	3,855.12	664,732.23	674,539.10
09/09	9,750.00	56.88	9,806.88	674,539.10	3,934.81	678,473.92	688,280.79
10/09	9,750.00	56.88	9,806.88	688,280.79	4,014.97	692,295.76	702,102.64
11/09	9,750.00	56.88	9,806.88	702,102.64	4,095.60	706,198.24	716,005.11
12/09	9,750.00	56.88	9,806.88	716,005.11	4,176.70	720,181.81	729,988.68
01/10	9,750.00	56.88	9,806.88	729,988.68	4,258.27	734,246.95	744,053.82
02/10	9,750.00	56.88	9,806.88	744,053.82	4,340.31	748,394.14	758,201.01
03/10	9,750.00	56.88	9,806.88	758,201.01	4,422.84	762,623.85	772,430.73
04/10	9,750.00	56.88	9,806.88	772,430.73	4,505.85	776,936.57	786,743.45
05/10	9,750.00	56.88	9,806.88	786,743.45	4,589.34	791,332.79	801,139.66
06/10	9,750.00	56.88	9,806.88	801,139.66	4,673.31	805,812.98	815,619.85
07/10	9,750.00	56.88	9,806.88	815,619.85	4,757.78	820,377.63	830,184.51
08/10	9,750.00	56.88	9,806.88	830,184.51	4,842.74	835,027.25	844,834.13
09/10	9,750.00	56.88	9,806.88	844,834.13	4,928.20	849,762.32	859,569.20
10/10	9,750.00	56.88	9,806.88	859,569.20	5,014.15	864,583.35	874,390.23
11/10	9,750.00	56.88	9,806.88	874,390.23	5,100.61	879,490.84	889,297.71
12/10	9,750.00	56.88	9,806.88	889,297.71	5,187.57	894,485.28	904,292.16
01/11	9,750.00	56.88	9,806.88	904,292.16	5,275.04	909,567.20	919,374.07
02/11	9,750.00	56.88	9,806.88	919,374.07	5,363.02	924,737.09	934,543.96

03/11	9,750.00	56.88	9,806.88	934,543.96	5,451.51	939,995.47	949,802.34
04/11	9,750.00	56.88	9,806.88	949,802.34	5,540.51	955,342.86	965,149.73
05/11	9,750.00	56.88	9,806.88	965,149.73	5,630.04	970,779.77	980,586.65
06/11	9,750.00	56.88	9,806.88	980,586.65	5,720.09	986,306.74	996,113.61
07/11	9,750.00	56.88	9,806.88	996,113.61	5,810.66	1,001,924.27	1,011,731.15
08/11	9,750.00	56.88	9,806.88	1,011,731.15	5,901.77	1,017,632.91	1,027,439.79
09/11	9,750.00	56.88	9,806.88	1,027,439.79	5,993.40	1,033,433.19	1,043,240.06
10/11	9,750.00	56.88	9,806.88	1,043,240.06	6,085.57	1,049,325.63	1,059,132.50
11/11	9,750.00	56.88	9,806.88	1,059,132.50	6,178.27	1,065,310.78	1,075,117.65
12/11	9,750.00	56.88	9,806.88	1,075,117.65	6,271.52	1,081,389.17	1,091,196.05
01/12	9,750.00	56.88	9,806.88	1,091,196.05	6,365.31	1,097,561.36	1,107,368.23
02/12	9,750.00	56.88	9,806.88	1,107,368.23	6,459.65	1,113,827.88	1,123,634.75
03/12	9,750.00	56.88	9,806.88	1,123,634.75	6,554.54	1,130,189.29	1,139,996.17
04/12	9,750.00	56.88	9,806.88	1,139,996.17	6,649.98	1,146,646.14	1,156,453.02
05/12	9,750.00	56.88	9,806.88	1,156,453.02	6,745.98	1,163,198.99	1,173,005.87
06/12	9,750.00	56.88	9,806.88	1,173,005.87	6,842.53	1,179,848.40	1,189,655.28
07/12	9,750.00	56.88	9,806.88	1,189,655.28	6,939.66	1,196,594.93	1,206,401.81
08/12	9,750.00	56.88	9,806.88	1,206,401.81	7,037.34	1,213,439.15	1,223,246.03
09/12	9,750.00	56.88	9,806.88	1,223,246.03	7,135.60	1,230,381.63	1,240,188.51
10/12	9,750.00	56.88	9,806.88	1,240,188.51	7,234.43	1,247,422.94	1,257,229.81
11/12	9,750.00	56.88	9,806.88	1,257,229.81	7,333.84	1,264,563.65	1,274,370.53
12/12	9,750.00	56.88	9,806.88	1,274,370.53	7,433.83	1,281,804.36	1,291,611.23
01/13	9,750.00	56.88	9,806.88	1,291,611.23	7,534.40	1,299,145.63	1,308,952.51
02/13	9,750.00	56.88	9,806.88	1,308,952.51	7,635.56	1,316,588.06	1,326,394.94
03/13	9,750.00	56.88	9,806.88	1,326,394.94	7,737.30	1,334,132.24	1,343,939.12
04/13	9,750.00	56.88	9,806.88	1,343,939.12	7,839.64	1,351,778.76	1,361,585.64
05/13	9,750.00	56.88	9,806.88	1,361,585.64	7,942.58	1,369,528.22	1,379,335.09
06/13	9,750.00	56.88	9,806.88	1,379,335.09	8,046.12	1,387,381.21	1,397,188.09
07/13	9,750.00	56.88	9,806.88	1,397,188.09	8,150.26	1,405,338.35	1,415,145.23
08/13	9,750.00	56.88	9,806.88	1,415,145.23	8,255.01	1,423,400.24	1,433,207.12
09/13	9,750.00	56.88	9,806.88	1,433,207.12	8,360.37	1,441,567.49	1,451,374.37
10/13	9,750.00	56.88	9,806.88	1,451,374.37	8,466.35	1,459,840.72	1,469,647.59
11/13	9,750.00	56.88	9,806.88	1,469,647.59	8,572.94	1,478,220.54	1,488,027.41
12/13	9,750.00	56.88	9,806.88	1,488,027.41	8,680.16	1,496,707.57	1,506,514.45
01/14	9,750.00	56.88	9,806.88	1,506,514.45	8,788.00	1,515,302.45	1,525,109.32
02/14	9,750.00	56.88	9,806.88	1,525,109.32	8,896.47	1,534,005.79	1,543,812.67
03/14	9,750.00	56.88	9,806.88	1,543,812.67	9,005.57	1,552,818.24	1,562,625.12
04/14	9,750.00	56.88	9,806.88	1,562,625.12	9,115.31	1,571,740.43	1,581,547.31
05/14	9,750.00	56.88	9,806.88	1,581,547.31	9,225.69	1,590,773.00	1,600,579.87
06/14	9,750.00	56.88	9,806.88	1,600,579.87	9,336.72	1,609,916.59	1,619,723.46
07/14	9,750.00	56.88	9,806.88	1,619,723.46	9,448.39	1,629,171.85	1,638,978.73

27. The Complainant's son, Kurt, was a graduate of Wyoming Seminary, King's College and he earned an MBA from NYU's Graduate School of Business, but because he was an alcoholic, drank himself to death.



28. Therefore, the Complainant intends to donate all of the Restitution Funds to a non-profit entity that the Complainant will form, called "Kurt's Place," which will be used to establish an orphanage that will adopt all children born from mothers who were drug or alcohol afflicted while they were pregnant and, therefore, their children were not appropriate for the normal adoption situation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph R. Reisinger". The signature is stylized with a large, looping initial "J" and a long, sweeping underline. Below the signature, the name "Joseph R. Reisinger" is printed in a black, sans-serif font.