

EXHIBIT F

Judge Brown issued 3 illegal Court Orders to help Cadle commit the crimes set forth Herein.

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A. The Facts

1. Procedural History

1. On August 19, 2010, JR filed a complaint to Case #2010-11074 against 18 Defendants because of numerous violations of his state rights to (i) equal protection, (ii) procedural due process, and (iii) substantive due process, as well as for conversion and conspiracy, etc. (the “11074 Complaint”).

2. Between the date of the filing of the 11074 Complaint and the beginning of 2014, numerous motions and responses to same have been filed by the various parties.

3. More specifically, on November 24, 2010, Dean filed a motion to dismiss JR’s 11074 Complaint.

4. In response to same, on January 3, 2011, JR filed a response to the motion and a copy of same is attached hereto as Exhibit F-2.

5. Additionally, on May 14, 2013, Cadle filed a motion to strike *lis pendens*, in reference to multiple properties and a copy of same is attached hereto as Exhibit F-3.

6. Next, in reference to the above case, Cadle filed an application for extraordinary relief and application for leave to file response *nunc pro tunc* on February 25, 2014, with the Supreme Court, to case #22 MM 2014.

7. On March 17, 2014, JR filed a response to the above application filed by Cadle with the Supreme Court.

8. Then, on July 1, 2014, the Supreme Court issued an Order denying Cadle's Application and forwarded a copy of same to the Luzerne County Prothonotary's Office, which is evidenced by the docket entry dated July 24, 2014 to case #2010-11074.

2. JR's Medical Status

9. On September 2, 2014, JR became seriously ill when, at around 11:30 a.m., he collapsed, and was taken by ambulance to Wilkes-Barre General Hospital where the ER physician staff had to intubate him.

10. JR remained intubated, unconscious and totally incapacitated for 48 hours in the WB General ICU, under around-the-clock care of multiple physicians and nursing staff, and then on September 4, 2014, JR regained consciousness and the breathing tube was removed;

11. The doctors at WB General determined that JR had suffered 2 seizures and a possible heart attack, resulting in JR remaining a patient at WB General for a total of 8 days, the first 3 in ICU, until he was discharged on the afternoon of September 10, 2014.

12. JR is still incapacitated at this time, and attached as Exhibit F-4 is a letter from Dr. Liscov that discusses JR's current testing, which is scheduled for

February 9, 2015 to be followed by an appointment with both Dr. Michael Raymond, his psychologist, and Dr. Sanjeev Garg, his neurologist.

3. Dean Notified of JR's Medical Status

13. Because of JR's current diminished medical condition since September 2, 2014, JR, with the assistance of his paralegals, has requested a continuance in each case that was then active in any Court, with copies of those requests being sent to opposing counsel in each matter.

14. In the above regard, Dean was notified of JR's then current medical condition on September 30, 2014, when JR's staff sent him a copy of a motion for extension of time to file, a copy attached as Exhibit F-5, because of his recent disabling illness.

15. The above was in reference to various docketing statements that he was obliged to then file with the Commonwealth Court, and attached as Exhibit F-6 is a copy of the certificate of service evidencing that service of the above was made on Dean on September 30, 2014.

4. Conspiracy By All Defendants

16. Four days after being notified of JR's medical condition, on Friday, October 3, 2014, Dean, on behalf of his clients, sent a letter to President Judge Thomas F. Burke, Jr. requesting that he assign the above Motion to Dismiss for

disposition, stating therein that “Plaintiff has not filed any response in opposition” and attached as Exhibit F-7 is a copy of Dean’s letter.

17. Therefore, it is believed that because of the timing of the above events, Dean, after he became aware of JR’s disability, contacted Shucosky again, as he had in the past, to discuss how they could again attempt to illegally defeat JR’s legal interests by intentionally violating his constitutional rights, etc., as in the past (the “2014 Conspiracy”).

18. The above was done in an attempt to again corrupt the legal process involving JR’s property interests that were then being protected by certain court filings JR had filed to defend against the fraudulent court pleadings filed by Dean and Fogerty.

19. Further, the plan which was designed by Dean and Shucosky, as part of the 2014 Conspiracy, and was then reviewed with Judge Brown to secure his approval, was developed to attempt to illegally defeat JR’s property interest.

20. In furtherance of the 2014 Conspiracy, Dean, Shucosky and Judge Brown agreed that Dean, on behalf of the Criminal Defendants, would simply write a letter requesting that Judge Burke, the President Judge, assign the case dealing with Dean’s petition to dismiss JR’s Complaint, that had been filed on November 24, 2010, in Case # 2010-11074, for disposition now by a judge.

21. The above letter, in pertinent part, reads as follows:

“ On November 24, 2010, Defendants filed a motion to dismiss pursuant to Pennsylvania Rule of Civil Procedure 233.1...Plaintiff has not filed any response in opposition. This matter is ripe. Accordingly, I would appreciate your assistance in assigning this matter for disposition.”

22. Further, in the above regard, it is believed that Dean informed Judge Burke that Judge Brown had prior involvement with the above case.

23. It was agreed that Dean should simply write the above letter to Judge Burke rather than formally file a petition with a rule to show cause which, of course, after being filed and served on JR, would have been continued because of JR's obvious current medical disability.

24. Therefore, the above Criminal Defendants agreed that Dean, in furtherance of the above corrupt scheme, would not request a hearing be held in response to his motion to dismiss so as not to alert JR's office of their scheme.

5. Dean's Letter and Judge Brown's Corrupt Order

25. As stated above, on Friday, October 3, 2014, Dean sent a letter to Judge Burke which stated the following:

“ On November 24, 2010, Defendants filed a motion to dismiss pursuant to Pennsylvania Rule of Civil Procedure 233.1...Plaintiff has not filed any response in opposition. This matter is ripe. Accordingly, I would appreciate your assistance in assigning this matter for disposition.”

26. Judge Burke, upon receipt of the above letter on or about Monday, October 6, 2014, simply issued an Order on Tuesday, October 7th, rather than advising Dean to follow proper procedure and file a petition, etc., as required by the local rules of civil procedure.

27. At that time, he, Judge Burke, assigned Judge Brown to address the motion referenced in the above letter, ostensibly because he had prior involvement with same.

28. Therefore, Judge Burke issued the above Order without requesting that Dean file any formal petition and serve JR with a copy of same, as required by fundamental and procedural due process.

29. Further, at the above time, Judge Burke also knew that Judge Brown was forcibly removed in 2012 by the Pennsylvania Supreme Court from having any further involvement with any cases involving JR because of all of Judge Brown's prior obviously unconstitutional rulings that were issued all adverse to JR in various cases.

30. Next, on October 8th, one day after the above Order was signed by Judge Burke, Judge Brown issued an Order, a copy attached hereto as Exhibit F-8, that had been requested by Dean on behalf of the TCB, dismissing JR's prior complaint, filed to Case # _____, in spite of the fact that Judge Brown knew that JR was disabled when he issued same, because he had received a copy of a motion

for extension of time to file, on September 30, 2014, which detailed JR's medical condition.

31. Judge Brown's above Order was issued without any conceivable legal basis, as detailed herein and therefore, his above Order constituted an illegal attempt by him, as part of the 2014 Criminal Conspiracy, to cheat JR out of his ownership interest in his above 28 Rental Properties.

32. Thus, even though the above is incredible that two lawyers, Shucosky and Dean, who are presently licensed to practice law in the Commonwealth of Pennsylvania, and a sitting Judge, would all conspire to illegally do all of the above, the above events of corruption did not stop with the above illegal actions.

33. Next, even though the above Order was signed on October 8, 2014, JR did not receive his copy of same until, incredibly, October 24th, sixteen (16) days later, because of further corruption by Dean, Judge Brown and Shucosky.

34. More specifically, Dean waited nine days before he sent a copy of the certified Order to JR and, further, he intentionally sent it to JR's former law office address, which then caused an additional seven-day delay in the delivery of same to him.

35. Therefore, by completely ignoring his responsibilities to provide timely notice to JR, as required by Pa. R.C.P. ____, Dean, on behalf of himself and all the other corrupt conspirators named herein, used the above delay technique to

maximize the prejudice stemming from same to JR, which resulted in only giving the disabled JR four-days to respond to Judge Brown's illegal Court Order.

36. Additionally, one of the results of the 2014 Conspiracy, being that Dean and the TCB, etc. intentionally illegally sabotaged JR's legal rights in regard to the above tax sales, was to attempt to cheat the Luzerne County taxpayers from ever being compensated for more than \$1,295,303 in unpaid real estate taxes that were stolen from the escrow account payments paid to Cadle for the years 2004, 2005, 2006, 2007, 2008, 2009, 2010 and six months of 2011, plus accrued interest.

37. Another purpose for the above corrupt conspiracy was that, once JR's case against the TCB and others was illegally terminated, precluding JR from asserting any further rights in that regard, Cadle, because of its above participation in the 2014 Conspiracy, will have also cheated JR out of \$3,900,000 represented by the value of his 28 Rental Properties that he illegally lost control of in 2007 and legal title to same in 2009 because of the illegal tax sale by the corrupt TCB and Dean.

38. After the above Order by Judge Brown was issued on October 8, 2014, on October 23, 2014, a Motion for an Extension of Time to File a Response to Defendants' Motion to Dismiss Plaintiffs' Complaint was filed by JR, a copy of which is attached hereto as Exhibit F-9.

39. Then, on November 4, 2014, Judge Brown issued an Order scheduling argument on Cadle's Motion to Strike the *Lis Pendens* and also issued an Order denying the Plaintiffs' Motion for Extension of Time to Respond to Defendants' Motion to Dismiss.

40. Next, on November 6, 2014, JR filed a petition to strike Judge Brown's October 8, 2014 Order granting the County Defendants' Motion to Dismiss.

41. Also, on November 18, 2014, JR filed a Petition for an Extension of Time Due to Current Health Issues.

42. On December 9, 2014, the County Defendants filed a Response in Opposition to JR's Petition to Strike the Court Order dated October 8, 2014, granting the County Defendants' Motion to Dismiss the Plaintiff's Complaint.

43. Judge Brown, on December 16, 2014, issued three Orders, one denying JR's Petition for an Extension of Time Due to Current Health Issues, one granting Cadle's Motion to Strike the *Lis Pendens*, and the third granting the County Defendants' Motion to Dismiss Plaintiff's Complaint.

44. Following the above three Court Orders issued by Judge Brown, all adverse to JR, JR then proceeded to appeal all three Court Orders to the Superior Court on January 5, 2015.

45. Thus, the above matters are waiting for disposition by the Superior Court of Pennsylvania at the present time.

6. Fraudulent Representations By Dean

46. The above Court Order, dated December 16, 2014, was issued solely because of Dean's above-described criminal actions, including his fraudulent representations to terminate JR's litigation rights in Case #2010-11074, and therefore, constituting the crime.

47. As stated above, Dean's letter had stated that the "Plaintiff has not filed any response in opposition," which statement was false, known to be false by Dean at the time he drafted the above letter and was made solely to illegally terminate JR's litigation rights in Case #2010-11074.

48. Next, a certified copy of JR's response to the motion to dismiss was served on Dean on January 6, 2011, and a copy of the transmittal letter, in the above regard, is attached hereto as Exhibit F-10.

49. Finally, the above fraudulent representation by Dean was made on behalf of, and with the advanced approval of, all of the above Criminal Defendants.

7. Fraudulent Actions By Dean

50. As stated above, the above Order was signed and docketed on October 8, 2014, and it is noted on the bottom of page 1 of the Order that it was mailed on

October 9, 2014, but JR did not receive a copy of the Order until October 24, 2014 because of the following corrupt actions:

a. the Order was not actually mailed to JR until October 17, 2014 (nine days after it was signed) as is evidenced by the postmark on the copy of the envelope attached as Exhibit F-11; and

b. the envelope was intentionally addressed to JR's former office address, located at 682 Wyoming Avenue, Kingston, and therefore had to be forwarded by the U.S. Postal Service to 213 E. Luzerne Avenue, Larksville, JR's correct address.

51. The above is despite the fact that the previous Court Order, issued by Judge Burke, referenced above, was sent to JR's correct address, as noted on Exhibit F-12.

52. Also, by virtue of prior correspondence involving Dean, he had reason to know of JR's new address and, therefore, the above actions were solely designed to attempt to fraudulently deny JR his constitutional rights to procedural and substantive due process.

B. Criminal Actions by Each of the Above Criminal Defendants

1. Criminal Actions by Dean

53. As detailed above, once Dean became aware of JR's disability, he quickly moved to contact his co-conspirators in an effort to destroy any possibility of JR being able to recover his property through civil channels.

54. Dean initiated the 2014 Conspiracy and lied to the President Judge of Luzerne County all in an effort to have the Court dismiss JR's 11074 Complaint, without JR having the opportunity to defend same due to his current disability.

2. Criminal Actions by TCB

55. At all times relevant hereto, the TCB, based on the recommendations it received from Dean, approved all of Dean's criminal actions, allegedly on their behalf.

3. Criminal Actions by Fogerty

56. As stated above, Fogerty conspired with Dean, the TCB and the judiciary to have the *lis pendens* stricken.

4. Criminal Actions by Cadle

57. At all times relevant hereto, Cadle's actions, in regard to having the *lis pendens* struck, were performed with the approval of, and at the direction of, their attorney, Fogerty.

58. In addition, the above criminal actions by Cadle were pursuant to the directions Cadle received from its company president and owner, D. Cadle, who was the chief corruptor in all of the above crimes.

C. Tortious Actions by Each of the Judiciary

1. Tortious Actions by Judge Brown

59. Judge Brown was aware of JR's disability at the time he issued his above 3 Orders and issued same solely to forward the position of his co-conspirators as outlined above.

2. Tortious Actions by Shucosky

60. Shucosky's actions, in regard to the matters outlined above, were done on behalf of himself, and in furtherance of the 2014 Conspiracy, and all of his actions were performed with malice toward JR in an effort to destroy his ability to recover assets that were illegally taken from him.