

COURT OF COMMON PLEAS OF WESTMORELAND COUNTY, PA

a. CIVIL ACTION

Laurence A. Bujdos

Plaintiff

Attorney Linda Whalen

v.

Deborah A. Bujdos

Defendant

1849DO2012

FILED IN  
PROthonARY'S OFFICE  
WESTMORELAND COUNTY  
2017 MAR 13 PM 3:45  
CHRISTINA O'BRIEN  
PROthonARY

*JUDICIAL NOTICE FOR DEFENDANTS DELAY APPEAL*

Now comes the Defendant, Deborah Ann Bujdos , representing herself, hereby gives Judicial notice of her delay to file an appeal pending the resolution of many issues presented to the court .

**Rule 1023.1. Scope. Signing of Documents. Representations to the Court. Violation.**

The signature of an attorney or pro se party constitutes a certificate that the signatory has read the pleading, motion, notice or other paper. By signing, filing, submitting, or later advocating such a document, the attorney or pro se party certifies that, to the best of that person's knowledge, information

and belief, it was formed after an inquiry reasonable under the circumstances of this case being delayed for 4 years ,

it is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation, the factual allegations herein have evidentiary support .

WIFE IS CURRENTLY WAITING FOR ANSWERS FROM THE DRO AND THE PROTHONATARY AND THE APOC REGARDING THE CORRECTIONS NEEDED ON HER TRANSCRIPTS , THAT MUS BE CHANGED. SHE IS WAITING TO HEAR WHY SOME OF HER ENTRIES ON THE C=DOCKED HAVE BEEN REMOVED. SHE IS PURSUING HER REQUEST TO

1. For several reasons listed below the defendant has decided to temporarily delay in filing any appeals or writs due to many unanswered and unresolved issue still pending before this court .
2. Defendant/ Wife wishes to inform this court she is not waiving her rights to file an appeal or a Petition Requesting petition review or for an Extraordinary Relief of Writs of Mandamus and Prohibition
3. Pursuant to Rule 3307 of the Pennsylvania Rules of Appellate Procedure
4. To start explaining the reason for choosing to delay is that it the defendant believes judge Smail refuses to leave this case and intends to render a decision in this case.

Based on the records in this case the court cannot make a fair decision when it does not have full disclosure , or have all the mandatory documents and the mandatory procedures have not been followed, deliberately by the master and the judge. While

it is uncertain that the defendant would be successful in obtaining a writ of any kind when the case is open, it is truly more likely that the defendant will have to file an appeal on the decision Judge Smail renders based on his past history of rendering inhumane unlawful and unconstitutional and unfair orders against the wife. All showed his blantant bias against the wife .

5. The wife has concerns as Judge Smail has refused to recuse and is intending to continue doing the Equitable Distribution when he does not have everything required by law to make a fair decision.
6. With this court being aware of all the violations LISTED BELOW THE IMPORTANT QUESTION IS how can this judge come up with any settlement if he cannot review the MANDATORY PRE TRIAL & TRIAL READINESS CERTIFICATE?????
7. When Fraud is used in procuring a settlement agreement that can justify setting aside the agreement & judgment as in
8. Daffin v Daffin 567 SW 2d 672 (Mo 1978)
9. In re: marriage of Modnick 33 Cal 3d 897, 191 Cal Rptr 629 (1983) Complan v Complan 101 Idaho 328, 612 P2d 1175 (1986)
10. Fraud in procuring a settlement can also be the basis for an independent tort action in this case as seen in :
11. Hess v Hess 397 Pa Super 395, 580 A2d 357 (1990)
12. THE WIFE HAS PRESENTED THIS COURT WITH FINANCIAL RECORDS FROM INVESTMENT COMPANIES AS PRIME FACIE EVIDENCE OF THE FRAUDULANT TRANSFERS MADE BY THE HUSBAND AND HIS ATTORNEY INCLUDING THE USE OF A FAKE POWER OF

ATTORNEY , FOR ATTORNEY WHALEN AND HER CLIENT TO REMOVE WIFES NAME FROM 500,000.00 METLIFE JOINT ANNUITY.

13. THE WIFE/ DEFENDANT HAS BEEN ADVISED OF AN AVENUE FOR RECOVERY AGAINST A SPOUSE AND THIRD PARTY FOR ECONOMIC FRAUD. IS RICO 18 USC 1961-64 (SUPP 1999) ,

14. WIFE IS AWARE THAT Spouses have even been successful in asserting violation of securities law , concerning the illegal removal of wifes name from annuity.

As seen in: Evans v Dale 896 F2d 975 (th cir 1990) "those who aided the offending spouse in the fraud" Most recent cases against an x spouse & 3rd party

Brown v Manged Care, Inc No M1999-0255-COA-R3 CV (Tenn ct of appeals 2/1/00 See also Restatement (second of torts & 876(b) 1977) where a spouse & another person act in concert for the common purpose of defrauding the other spouse,

15. Defendant is not waiving her rights to file the application seen below for relief.

16. This Supreme Court has authority to entertain an application pursuant to Rule

17. 3307(b) of the Pennsylvania Rules of Appellate Procedure and Section 721 of

18. Pennsylvania's Judiciary and Judicial Procedure Code (42 Pa. C.S. § 721 (Supreme

19. Received 7/5/2016 12:49:33 PM Supreme Court Eastern District

20. Filed 7/5/2016 12:49:00 PM Supreme Court Eastern District

21. 108 EM 2016

22. Court shall have original jurisdiction of "mandamus or prohibition to courts of

23. inferior jurisdiction").

24. Petitioner DEBORAH ANN BUJDOS seeks Emergency Relief in the form of Writs

25. of Prohibition and Mandamus to the Westmoreland County Court of Common Pleas.
26. A copy of the proposed Petition for Extraordinary Relief of Writs of
27. Mandamus and Prohibition shall be attached.
28. The filing is necessary to resolve an ongoing injustice in the
29. Westmoreland County Court of Common Pleas , further explanation shall be provided in formal petition once the Westmoreland County provides wife with the unanswered and unresolved issues pending in this court that is required for wife to file an appeal, writ, or for relief.
30. Deborah Ann Bujdos's pending Divorce and Equitable Distribution Proceedings Contains many unresolved issues , despite agreement with the laws of Commonwealth she is entitled to have her previous orders vacated. They were procured by Attorney Whalen with fraud on the court with the use of Ex Parte, retaliatory Motions in June 2015 containing false information.
31. All of Judge Smail's orders that stemmed from those felonious motions are unreasonable, without warrant and without fact, finds, with a question of laws to support such egregious unconstitutional orders against the innocent spouse who was also a domestic violence victim.
32. 6. The assigned Judge Harry Smail has unnecessarily delayed this case by denying the wife's petitions presented to him for dismissal of vexatious hearings that were procured by fraud.
33. Judge Smail delayed this case from proceeding to the final and fair conclusion by consistently granting Plaintiff and his attorneys repeated vexatious, frivolous

hearings, including accepting the motion from a recused judge and granting an Ex Parte hearing for Exclusive Possession of the home.

34. To further delay the case in April 2015 the judge allowed a **IRONICALLY THE DOCKET ENTRY FOR 9-29-15 THAT PROVES THE TAXES WERE PAID DISAPPEARED FROM THE DOCKET** he husband to have a contempt hearing to be heard with no facts to support having a hearing for either of the proceedings. December 2016 the judge delayed the contempt from April and found the wife in contempt charging her 17,000.00 for 100.00 a day fines and 15,000.00 paid to husband for items that were never proven to have been removed and never were removed by the wife from the home .
35. Despite petitioners good intentions and full cooperation to remedy the only matter requested in the fraudulent, ex parte motion for the Exclusive Possession of the home that was simply stated in the motion it was based on one year of unpaid taxes by the wife on the marital home.
36. Defendant paid taxes on 9-29-16 yet the judge refused to dismiss the hearing to evict the wife, **HE DENIED HER REQUEST TO DISMISS AND SAID " THERE ARE OTHER REASONS FOR DOING THE EP OF THE HOME" BUT NEVER GAVE ANY EXPLANATION AS TO WHAT THE LAWFULL REASONS ARE THAT STATE IT COULD BE TO CONTINUE .**
37. They have delayed this case for 18 months , and is blocking Deborah Ann Bujdos's case from proceeding through the court system
38. More delays are due to Judge Smail's pattern of denying each of the wives motions she has submitted that would have pushed this case forward and prevent further

wasted time in the court.85. Judge Smail made a final decision on August 30, 2016 then he vacated it and vacated the masters report. before hearing exceptions.

39. Mrs. Bujdos is in what seems to be a catch 22 situation due to the delay of this courts lack of resolving serious issues and answering many questions before rendering a final decision in this case .

40. Without a final decision the wife will not be successful in obtaining relief from the higher courts without the final decision.

She is in need of the higher courts help. Listed below are some of the valid reasons why she should file the petitions for writs needed relief .

41. She is without any other legal remedy , as this the court has ignored the mandatory rules for a master and for full discovery it has ignored the fact that opposing counsel has refused to comply with discovery. Allowing them to hide assets, by denying wife her final discovery on May 6, 2016

42. The court has ignored the proof of the violations and crimes that have been committed during this case.

43. This court has denied all of wife's requests for dismissing the vexatious ex parte hearings and denying her right to discovery for full disclosure on May 6, 2016

44. 10. Both judges in this case has denied her repeated requests to release her own income , still held by the husbands attorney , so she could adequately be on a par with the husband for a fair defense.

45. The court and the DRO have violate the APL laws so that wife was provided the right to a fair divorce .
46. 11. The masters report was vacated by this court in its September order vacating that and the judges first Equitable Distribution Order.
47. The court does not have a full list of debts and liabilities that should have been included in the masters report.



Please take note of the additional issues presented today for judicial notice

1. The masters report does not include the fact that The wife has not been receiving adequate support and owed thousands in back support as husband lied about his true income should have been included in the masters report.
2. The masters report does not include the fact that The wife has not been receiving adequate support to have a fair defense
3. She has lost her credit due to having to pay the husbands share of the marital credit card debt when she does not have the right amount of APL
4. The court does not have a list of the debts wife incurred and are marital to consider for ED.
5. The court has no accounting for an additional 48 acres of land with mineral rights.
6. The husband failed to include an additional 48 acres not listed on his inventory from the Crawford farm that was sold in 2005.
7. January 24, 2017 a motion was heard in part then shut down abruptly. That caused the wife to be denied access to her own funds to have urgent medical care done A copy of x rays a bill for the costs of the surgery and the surgeons report to explain the procedure needed for the oral surgery was given to the court in the motion to be heard on January 24, 2017, in her last petition for special relief. Wife still has not been

able to have the surgery and is in extreme pain . The surgery will cost as noted on the bill is 37,000.00,

8. The court has done nothing to protect the wife who has been sued for marital credit card debt, Wife presented receipts to attorney Whalen at masters hearing to show that much of the charges were used for the care of the home while the parties both lived there. Including landscaping and maintenance on the home.
9. Wife was falsely accused of wildly spending on her charges by attorney Whalen . On June 22, 2016 The wife proved that was not the truth.
10. The husband was guilty of spending wildly on his charges proven by the wife seen on the transcripts from on 6-22-16 when The wife presented the court and attorney Whalen with copies of the husbands charge records showing his extreme dissipation that showed at one point he had paid over 20,000.00 one of his cards for toy cars, sole vacations and parts to rebuild cars.
11. Husbands charges were always paid off by him immediately the wifes were not, because he demanded to be in control of paying the bills.
12. The wife showed and has attached a copy of her bank statements from the time of separation to date.
13. The court must consider she paid over 33,000.00 post separation of the preseparation credit card balance of 56,000.00 bills when she received any advances. Wife did pay more than half of the debt Despite the fact that she was only receiving 3,582.00 half of the correct amount of spousal support (as seen in paragraph below the guideline for support)

**14. The wife's bank statements prove 2 very important things**

**15. A.** Attorney Whalen has repeatedly lied by stating the wife never paid her bills when the statements all prove she lied REATEDLY TO THE COURT FOR 4 YEARS WHILE TRYING TO EVICT WIFE FROM THE HOME .

**16. B. THE OTHER THING THE STATEMENTS PROVE :**

Is the wife used every penny she had during the divorce to pay for the marital home and its bills consistently , The court must recognize

The wife paid the mortgage on the home at 885.00 a month out of her 3,500.00 for the deliberately encumbered mortgage the husband placed on the home.

The wife's statements show she paid all the other house bills and pre separation creditcard bills and attorney fees.

**WIFE WAS DENIED DUE PROCEES FOR A FAIR TRIAL AS SHE WAS DENIED ACCESS TO HER OWN RETIREMENT MONEY AND THE RDO DENIED HER THE FAIR AMOUNT OF THE APL SHE WAS ENTITLED TO WHEN SHE LOST 3,700.00 A MONTH INCOME ACCORDING TO THE GUIDLINE LISTED BELOW**

The PA APL guideline for the parties with no children is 40% of the 18,000.00 net income husband receives husband receives , that amounts to 7,200.00 should have been paid to the wife monthly since 2012. The wife has been deprived of 3,700.00 of monthly support since January 2013 when Attorney Whalen took wifes 3,700.00 retirement income from the wife, without her permission, to deliberately to place the wife in financial suppression

The wife has been deprived her 3,700.00 a month for 4 years even though the parties contract states that payment changes cannot be done once they are in pay status , **NOT even by court order**

17. The total support kept from wife since January 2013 by Attorney Whalen is 3,700.00 per month for 37 months = \$136,900.00
18. THE COURT SHOULD HAVE ORDERED THE HUSBAND TO PAY THE OUTSTANDING CREDIT CARD BILLS ONCE WIFE PAID OVER HALF DURING THE SEPARATION.
19. TO DATE The husband paid zero on the marital credit card debt when he had also been receiving the same amount in advances as wife RECEIVED .
20. Husband was and is continuing to receive 18,000.00 net a month income.
21. The wife has lost all of her credit due to her funds being taken from her.
22. The wife was evicted from the home that was done by Attorney Whalen having ex parte communications with Judge Scherer .
23. Jude Smail violated the judicial conduct code by accepting any ex parte motions especially from the recused judge.
24. Having stated all of above and considering the PA divorce Code and laws The wife presented sufficient evidence to this court and by law should have granted wifes previous request for a new trial but was denied that too ,
25. The judge has refused to recuse repeatedly when there HAS BEEN EVIDENCE SUBMITTED THAT SHOWS more than an appearance of impartiality ,
26. The previous recusal motions included in detail how this Judge has violated the cannons, Accepted ex parte motion from recused judge

27. Ignored fraud on the court in the ex parte motions that lead to evicting wife and delaying the case 18 additional months and unlawfully charging wife with contempt and ordering her to pay excessive fees for the contempt
28. The wife has been blatantly denied her constitutional and civil rights by this the court.
29. Judge Smail intends to do the parties equitable distribution while he does not have all the facts and basing his decision on an incomplete masters report that he, himself vacated.
30. The judge and the master know there has not been full disclosure of the assets.
31. The judge is aware the husband refused to provide a boilerplate release for the wifes forensic accountant to review 22 investments not listed on his inventory or an explanation for the un accounted 2.3 million dollars .
- 32. THE FOLLOWING ISSUES MUST ALSO BE CONSIDERED BY THIS COURT PRIOR TO A FINAL DECISION .**
- 33. Defendant has repeatedly requested answers as to why her docket has been tampered with and the transcripts are missing very important statements made in the court.**
- 34. 2.Pa law 4911-tampering with court records or information 1. knowingly making a false entry or false alteration**
- 35. In re: Delaney 819 A2d 968, 981 NH**
- 36. This court is aware of all the violations of Master Bononi and attorney Whalen in regards to paying him an excessive amount of 10,000.00 and not following the**

mandatory requirements for a masters hearing, beginning with waiving pretrial statement for attorney Whalen.

37. THIS COURT IS AWARE THAT ATTORNEY WHALEN USED EX PARTE COMMUNICATIONS TO APPOINT A MASTER.

38. Master Bononi waived the pre trial and trial readiness certificate, mandatory for a master hearing, pretrial statement must be used in considering the Equitable Distribution Process .

39. The court is aware that attorney Whalen has illegally kept the marital retirement annuities in her trust since 2013 to financially suppress wife during litigation.

40. THERE IS STILL NO EXPLANATION AS TO WHY Master Bononi received \$10,000 paid to him directly from Attorney Whalen.

41. Why was this done without the wifes consent.

42. Why was THAT WAS PAID OUT OF HER share of the marital retirement annuities.

43. Why was this not reported that Attorney Whalen and Master Bononi violated IOLTA requirements that require a sub account to be set up for master

44. Why was he paid directly and avoided the prothonotary and without wifes consent ?

45. The January 24, 2017 transcript for the emergency petition for relief was received on 2-17-17 by the defendant. After a review she again has found many errors in the transcript.

46. She was informed by James Mc Coy that after 2-17-17 he will no longer be Judge Smails court so who will make these corrections?

47. There is no resolution regarding the altered transcripts.

48. Defendant has requested if it is possible to listen to the audio tapes so that her transcripts can be corrected, for appellate reasons, before this case is closed . She was denied this too.
49. There are many unanswered question based on all the violations, and deprivation of defendants rights the wife has endured by this court .
50. The wife states: after she carefully researched cases sent to the higher courts for review of petitions, she has learned that she will not be successful unless these transcripts are corrected ,
51. If these transcripts and the docket errors are not corrected prior to any appeal or review from the higher courts would be a waste of the wifes and the higher courts time and without the correction any request for relief would be thrown out by the higher court.
52. She also realizes that filing for the intervention of the higher court may be considered premature, now with no final decision made by this court that she can appeal.
53. This is quite perplexing considering that this court cannot make a decision without addressing the fraudulent transfer of the jointly owned metife 500,000.00 annuity that guarnteed the parties 3,500.00 a month for retirement for life. The husband the broker and his attorney have been reported to the SEC and FINRA .
54. Additionally the court must consider I am the innocent spouse and it has a duty to report the crimes committed here in this case . The court was provided with the clear

and convincing evidence proving the husband is guilty of financial misconduct , while planning a divorce ,

55. The husband purposely encumbered the marital home with a mortgage when it was debt free in the event of a divorce.

56. FINANCIAL RECORDS SHOW Husband removed wifes name from all insurance policies and other investments while anticipating a divorce. This was not done in good faith or with the wifes knowledge of her name being removed from all investments that had her named beneficiary since 1998 as seen in the documents presented to the court.

57. ALIMONEY CONSIDERATIONS: THE COURT MUST CONSIDER THIS WHEN CONSIDERING THE WIFES RIGHT TO LIFETIME ALIMONY WOULD BE THE CORRECT DECISION WHEN THE PARTIES HAVE CONTRACTS THAT STATED THEY WERE GOING TO CONTINUE RECEIVING 3,700.00 A MONTH EACH FOR LIFE AS THE RETIREMENT INCOME.

58. THE COURT MUST CONSIDER THE HUSBAND SECURED HIS FUTURE INCOME BY DRAINING THE WIFES RETIREMENT FUNDS

59. FINANCIAL RECORDS SHOW THE HUSBAND drained the jointly owned 500,000.00 John Hancock annuity and it's contract states that annuity was to pay the parties 4000.00 a month for retirement for life . BY HUSBANDS ACTIONS HERE THE WIFE LOST 4000.00 A MONTH FOR LIFE.



60. FINANCIAL RECORDS SUBMITTED SHOW The husband drained the annuity it to pay off a mortgage and procure a new lease for a rental building to secure his own future 13,000.00 a month income.

61. THE COURT MUST ALSO CONSIDER THE FACT THAT THE HUSBAND LIED TO THE DRO ABOUT HIS TRUE MONTHLY NET INCOME. HE CLAIMED IT WAS 11,000.00 IN OCT. 2012 THEN IN DECEMBER HE TELLS THE COURT HIS MONTHLY NET INCOME IS 7,000.00. SEE FORENSIC ACCOUNTANTS REPORT SHOWS THE HUSBAND RECEIVED 20,000.00 NET MONTHLY INCOME IN 2012. THE WIFE SHOULD BE REIMBURSED FOR ALL OF THE ADDITIONAL INCOME HUSBAND DID NOT REPORT TO THE DRO TO AVOID PAYING WIFE MORE SUPPORT. (See information from the 9-9-15 transcript Husband states he cannot live on 18,000.00 a month and had to take money from his IRA to live on) Further proof of his lying to the DTO was preciously sent to this court and the DRO last week proving the husband has lied about his true income and wife was deprived her correct amount of APL since 2012 ) for a fair divorce. See Forensic accountants report showing husband monthly net income for 2012-2014.)

62. ISSUE OF ANNUITY FRAUDULANT TRANSFER AND BREECH OF CONTRACT OCCURRED When Attorney Whalen took control of the 2 annuity income in 2012 that was a violation of the parties contract. That was income for both parties. She had no right to assign the wife a mimimum wage capacity on Dec. 19, 2012, when the wife had her own income of half of the 2 annuities monthly payments of 3,700.00 per month for life as stated in both contracts.

63. According to the Annuity law and the parties contracts state not even a court order can change the method of monthly payment, by which the owners of the annuities originally had in their contract. The wife must remind the court that their annuity's were purchased in 2004 with contracts stating the parties would begin to receive their monthly payments in 2008 and continue for the rest of their lives.
64. The wife would also like to AGAIN remind this court and the DRO that she never gave anyone permission to take her annuities.
65. ISSUE OF WIFE BEING DENIED full disclosure,
66. NO ed DECISION CAN BE MADE WITHOUT ALL OF WIFES EVIDENCE . AN ISSUE REAMAINS UNRESOLVED BY THE COURT AND THE MASTER AFTER THE MASTER REFUSED TO ENTER ALL OF WIFES EVIDENCE ON MAY 9, 2016 IF SHE CALLED HER VET TO VERIFY SHE DID NOT HARM HER PETS , AS THE OTHER SIDE AND THE JUDGE ACCUSED HER OF DOING AT THE EXCLUSIVE POSESSION OF THE HOME HEARING.
67. WITHOUT ALL OF BOTH PARTIES EVIDENCE ON THE RECORD NO DECISION CAN BE MADE .
68. WITHOUT ALL OF BOTH PARTIES EVIDENCE ON THE RECORD wife is at a disadvantage to seek the higher courts intervention at this time.
69. WHEREFORE, DEBORAH ANN BUJDOS requests this Court take judicial notice the aformentioned unresolved serious issues and unanswered questions that must be

resolved on the record prior to her being able to file for any Petition for Extraordinary Relief of Writs of Mandamus and Prohibition . All issues must be resolved before requesting assistance from the higher courts or any Equitable Distribution Decision or final Decree can be made.

70.

Respectfully Submitted, by,

*Deborah Ann Bujdos* 3-9-17

DEBORAH ANN BUJDOS

*Deborah Ann Bujdos* 3-10-17

**E XHIBITS INCLUDED ARE CLEAR AND CONVINCING EVIDENCE THAT DESCRIBES IN DETAIL ATTORNEY WHALEN'S EXTREME DECEIT SHE USES IN HER PRACTICE AND THE CRIMES SHE HAS COMMITTED TO DEFRAUD THE WIFE IN THIS CASE .**

**THE COURT AND OTHER OFFICIALS HAVE BEEN INFORMED OF HER CRIMES, TO THE WIFES KNOWLEDGE NONE OF THE OFFICIALS HAVE REPORTED ATTORNEY WHALEN . WIFE HAS FILED A CRIMINAL COMPLAINT AGAINST HER.**

**THE WIFE FEELS THAT SHE HAS BEEN TREATED UNFAIRLY BY THIS COURT BY THE UNCONTITUTIONAL ORDERS THAT WERE MADE BASED ON ALL THE FALSE AND FRAUDULANT EVIDENCE OR TESTIMONY FROM ATTORNEY WHALEN WHEN THE COURT KNEW OF HER EX PARTE CONDUCT AND ILLEGALLY HOLDING WIFES FUNDS FROM HER.**

**EXHIBIT A pages 1-9 WIFES CHECKING RECORD PROOF SHE ALONE PAID \$33,966.87 ON PRE SEPARATION MARITAL CREDIT CARDS DEBT , PAID BY WIFE DURING SEPARATION. BAL. REMAINS OVER 20,000.00 HUSBAND WAS SUPPOSE TO PAY AND HAS NOT. WIFE HAS LOST HER CREDIT AND HAS JUDGEMENTS AGAINST HER SINCE HUSBAND FAILED TO PAY HIS SHARE.**

**EXHIBIT B page 1 FRAUDULANT TRANSFER PROOF CONFIRMATION LETTER FROM METLIFE AFTER WIFE ALERTED METLIFE THAT HER NAME WAS REMOVED FROM THE JOINT ANNUITY WITHOUT HER PERMISSION IN Feb. 2015**

**ATTORNEY WHALEN'S TRUST RECORD SHOWS SHE NO LONGER RECEIVED FUNDS FROM MET LIFE RETIREMENT INCOME ANNUITY. METLIFE FROZE THE FUNDS AFTER LEARNING OF THE FRAUDULANT TRANSFER.**

**EXHIBIT C 1. / Page 1 /**

- 1. ATTN WHALEN'S TRUST REPORT OF THE PARTIES METLIFE AND JOHN HANCOCK ANNUITY RETIRMENT INCOME ,**
- 2. IT SHOWS WHEN THE FRAUDULANT TRANSFER TOOK PLACE AND WHEN THE FUNDS WERE FROZEN BY METLIFE.**
- 3. ALSO SHOWS THE MANY TIMES MANY CHECKS WERE DEPOSITED ON SAME DAY AFTER HOLDG THEM FOR MONTHS .**
- 4. THIS WAS A NON INTERERST BEARING ACCOUNT SHE CONTINUED TO USE.**
- 5. HER PAY OUT RECORD SHOWS WHEN THE BRIBERY TOOK PLACE AS IT SHOWS THAT SHE PAID THE MASTER 10,000.00, FROM THE RETIREMENT FUNDS.**
- 6. IT SHOWS SHE WAS PAID 15,000.00 FOR HER OWN FEES IN October 2015 when attorney Dunn was paid from the parties retirement income .**

**EXHIBIT C2./ Page 1 / THIS IS ONE OF ATTORNEY WHALEN'S LETTERS CONFIRMING SHE WAS HOLDING MULTIPLE CHECKS FOR MONTHS TO DEPOSIT. THEY WERE HELD UNTIL THE WIFE SIGNED THEM.**

**THAT IS UNTIL THE FRAUDULANT TRANSFER TOOK PLACE AND WIFE'S NAME WAS REMOVED FROM THE METLIFE ANNUITY.**

**EXHIBIT C 3. / Page 1 / EXPLANATIONS OF ATTORNEY WHALEN'S VIOLATIONS REGARDING MISUSE OF FUNDS AND HER WELL DOCUMENTED 4 YEAR SCHEME TO DEFRAUD WIFE**

**EXHIBIT D ./ Page 1 /**

- 1. FRAUDULANT TRANSFER EVIDENCE**
- 2. A COPY OF METLIFE CHECKS AFTER THE FRAUDULANT TRANSFER WAS COMPLETE.**
- 3. THE CHECKS WERE ISSUED ONLY IN HUSBAND'S NAME INSTEAD OF JOINT AS IT WAS .**

**EXHIBIT E. / 1PAGE/**

- 1. THIS IS THE FIRST PART OF 3 EX PARTE MOTIONS DONE EX PARTE IN JUNE 2015 FILED BY WHALEN ATTORNEY TO DEFRAUD THE WIFE.**
- 2. THIS ONE IS ATTORNEY WHALEN'S EX PARTE FRAUDULANT MOTION PRESENTED TO GET AN EXCLUSIVE POSSESSION OF THE HOME HEARING TO EVICT WIFE AGAIN. .**

3. THIS IS PAGE 3 OF ATTORNEY WHALENS EXPARTE MOTION JUNE 2015 , SHE FALSELY ACCUSES WIFE OF NOT PAYING MTG .
4. WIFE PROVED THIS WAS A REPEATED LIE
5. WIFE PRESENTED HER CHECKING RECORDS PROVING EVERY MORTGAGE PAYMENT WAS MADE ON TIME.
6. THAT LIE WAS TOLD SEVERAL TIMES IN DIFFERENT MOTIONS AND WIFE PROVED THEY WERE FALSE.
7. ATTORNEY WHALENS MOTIONS SHOW HER FALSE ACCUSATIONS WERE MADE BY HER TO TRY TO HAVE THE WIFE EVICTED FOR 4 YEARS. THIS IS A FELONY

**EXHIBIT E 2 PAGE2**

1. THIS IS THE SECOND EX PARTE MOTION FILED JUNE 17, 2015 BY Attn W. TO DELIBERATELY FORCE WIFE IN FRONT OF DIVORCE MASTER BEFORE HER DISCOVERY WAS DONE. THE MOTION IS AGAIN FRAUDULANT .

**PRESENTING FALSE INFORMATION ON MOTIONS**

**NOTE ON THE Motion numbered 1-2-5-6 all contain false information seen below.**

1. She states discovery is done, when it is not
2. She states that I appeared when I did not and further lies by saying I had Attorney Ron Chicka there.

**I was not served any notice of this motion so I did not appear.**

**REMARKS:**

Further proof of Attorney Whalen's repeated lies on motions can be seen on Attorney Chicka's invoice, that shows he no longer represented me after May 15, 2015 He quit due to not being paid.

Further proof attorney Chicka did not appear was confirmed by his secretary, who told the wife, Attorney Chicka had nothing on his schedule the day this motion was presented.

5. MORE FALSE STATEMENTS : She states the action is not complex, when in fact it is and was complex.

6. MORE FALSE STATEMENTS She tells the court the masters hearings will only take 2 days.

This is a felony to lie to the court in her motions.

**EXHIBIT F PAGES 1-3**

**UNPAID MEDICAL EXPENSES 2012-2013 PRESENTED 3-25-15**

**EXHIBIT G 2 PAGES / BRIBERY OF THE MASTER**

**EVIDENCED BY THE CHECK SHE PAID MASTER BONONI 10,000.00, FROM THE PARTIES  
RETIREMENT INCOME**

**FOR VERIFICATION THAT 10,000.00 IS AN UNHEARD OF AMOUNT TO PAY A MASTER SEE  
BELOW AND SEVERAL OTHER CASES IN THIS COUNTY CONFIRM THERE WAS NO LOGICAL**



**REASON TO PAY 10,000.00 TO A MASTER WITH NO CONTRACT OR SIGNATURES APPROVING THIS FROM THE HUSBAND OR THE WIFE .**

**EXHIBIT G PAGE 2 BRIBERY CONFIRMATION:**

- 1. SEE COMPARRISON CASE USING THE CORRECT CRP , BELOW:**
- 2. WILLIAMS V WILLIAMS CASE # 2022 OF 2014 -D FROM SAME COUNTY IN 2016**
- 3. THIS IS AN ORDER SIGNED BY JUDGE KRIEGER DATED JUNE 8, 2016**
- 4. IT STATES THE CORECT AMOUNT FOR MATERS FEES ARE \$ 248.00 THAT IS TO BE DEPOSITED IN THE PROTHONATARY FOR THE DIVORCE MASTER FEES PAID TO .**
- 5. ( JAMES R. SILVIS) FOR THE WILLIAMS CASE.**

**REMARKS:**

**THE EXHIBITS BELOW DESCRIBE WITH CLEAR AND CONVINCING EVICENCE / PRIME FACIE EVIDENCE OF THE CRIMES COMMITTTED IN THIS CASE THAT HAVE BEEN IGNORED IN ORDER TO DEFRAUD, FINANCIALLY SUPPRESS AND DEPRIVE THE WIFE OF HER HOME/ LEAVING HER HOMELESS / DEPRIVING HER A FAIR DIVORCE / AND USING THESE STRATEGIES TO FORCE WIFE TO ACCCEPT AN UNFAIR SETTLEMENT IN T HIS CASE DURING 2012-2017 AND CONTINUES HER CRIMES WITHOUT BEING CHARGED FOR THESE SERIOUS CRIMES.**

**ATTORNEY WHALEN'S CRIMES HAVE BEEN EXPOSED, AND REPEATEDLY REPORTED BY THE WIFE TO THE LAW ENFORCEMNT AGENCIES, TO HER OWN FIRM, AND TO THE COURT OFFICIALS . WIFE SUBMITTED ATTORNEY WHALENS OWN RECORDS AND INVOICES DETAILING HER CRIMES AND SCHEME TO DEFRAUD THE WIFE AND EVICT HER FROM THE MARITAL HOME , WHILE THE WIFE HAD A PFA THAT SHE VIOLATED AND TRIED TO FORCE**

HER TO MOVE BEFORE DISCOVERY WAS DONE AND DURING THE LITIGATION . SHE HAD WIFE WRONGFULLY EVICTED FROM HOME BY USING LIES IN HER MOTIONS THAT HAVE BEEN REPORTED TO THE COURT AND THIS COURT HAS CHOSEN NOT TO REPORT HER CRIMES AND VIOLATIONS AND ASSISTED HER IN HER SCHEME BY EVICTING THE WIFE , LEAVING HER HOMELESS. SEE EXHIBITS BELOW FOR PROOF.

EXHIBIT H /1 PAGE

1. SEE A COPY OF THE FRAUDULANT POWER OF ATTORNEY PREPARED BY ATTORNEY WHALEN  
ON 4-17-13 THE DAY OF THE SECRET EVICTION HEARING WHILE A PFA WAS IN EFFECT.
2. THE POA WAS CREATED FOR THE HUSBAND AND ATTORNEY WHALEN TO GAIN CONTROL OF THE WIFES 3,700.00 MONTHLY RETIREMENT CHECKS THE WIFE WAS RECEIVING SINCE 2008 .
3. THE PARTIES ANNUITY CONTRACT STATED BOTH THE HUSBAND AND THE WIFE TO CONTINUE GETTING THESE PAYMENTS MONTHLY UNTIL THEIR DEATHS.
4. THE FAKE POA SHOWS THE DATE OF NOTARY AND SIGNATURES DO NOT MATCH. THEY ARE INCORRECT AND THE WIFE DID NOT SIGN THIS .
5. ATTORNEY WHALENS OWN INVOICE SHOWS SHE CHARGED HER CLIENT TO PREPARE THIS POA TO TAKE WIFES MONEY.
6. THE DOCKET WILL SHOW THIS POA WAS CREATED THE SAME DAY ATTORNEY WHALEN ORGANIZED A SCHEME TO HAVE A SECRET EXCLUSIVE POSSESSION OF THE

HOME HEARING , SHE DID NOT INFORM OPPOSING COUNSEL OF HER INTENTIONS FOR 4-17-13 WAS TO HAVE AN EVICTION HEARING.

7. ATTORNEY WHALEN'S OWN INVOICE SHOWS THAT WAS PREMEDITATED, IT SHOWS SHE HAD BEEN PLANNING TO DO THIS BY SENDING SUBPOENAS TO PEOPLE FROM THE PARTIES BANK THAT HOLDS THE HOMES MORTGAGE.
8. ATTORNEY WHALEN HAD BEEN HOLDING A \$15,000.00 CHECK THAT SHE OWED THE WIFE SINCE DECEMBER 2012
9. (PROOF AGAIN SEEN ON HER PAY OUT RECRD FROM THE FIUNDS)
10. ATTORNEY WHALEN WAS HOPING THE WIFE DID NOT PAY HER MORTGAGE, ON 4-17-14 IF SHE DID NOT HAVE THE 15,000.00 TO PAY HER BILLS WITH. WIFE DID HAVE HER MORTGAGE PAID SO THIS SHAM FAILED THAT DAY .
11. ATTORNEY WHALENS RECORD SHOWS SHE PAID THE WIFE THE 15,000.00 THAT SAME DAY AFTER ATTORNEY WHALEN LOST THE HEARING.
12. HER RECORD SHOWS SHE DISBURSED 2 CHECKS THAT DAY FOR 15,000.00 ONE FOR THE HUSBAND AND ONE FOR THE WIFE.
13. IT SHOWS HOW LONG SHE HOLDING THE 15,000.00 THAT SHE OWED WIFE IN DECEMBER 2012 FOR MONTHS OF BACK RETIREMENT INCOME CHECKS SHE WAS HOLDING.
14. ATTORNEY WHALEN'S 4-17-13 MOTION / EVICTION SHE FALSELY ACCUSES WIFE OF NOT PAYING HER BILLS OR MORTGAGE
15. EVICT WIFE WHILE THE HUSBAND WAS IN ARREARS OF SUPPORT SEEN IN THE DRO NOTICE TO HIM

**16. EVICT WIFE WHILE SHE HELD 15,000.00 OF THE WIFES MONEY.**

**EXHIBIT I VIOLATIONS OF APL LAW, 6 PAGES**

1. THESE PAGES SHOW THE CORRECT AMOUNT OF APL FOR 10-24-12 BUT BASED ON ONLY 11,000.00 NET PER MONTH INSTEAD OF THE TRUE NET INCOME FOR HUSBAND AT \$20,041.00
2. THE 10-24-12 ORDER WAS STAMPED AND SIGNED BY THE DRO
3. THE BOGUS 12-19-2012 ORDER HAS NO STAMP AND ONLY REPORTS INCOME OF HUSBAND AT NOW 7,000.00 INSTEAD OF THE 20,041.00 TRUE INCOME.

**EXHIBIT J 4 PAGES**

VIOLATIONS

**EXHIBIT K 2 PAGES**

HIDDEN CASH FROM PERSHING RETIREMENT FUNDS AND LOANS  
TO LARRY BUJDOS

**CERTIFICATE OF SERVICE**

I hereby CERTIFY that a copy of my true and correct judicial notice of adjudicative facts , notice of delay and attachments was sent to The Honorable Judge Harry Smail , Attorney Linda Whalen , Court administrator Amy Mears De matt , Attorney Eric Bononi, Attorney Terrance o' Halloran By U.S. Mail, ~~FAX~~, to each of the parties listed above on: 3-9-17 . I understand that such statements are made subject to the penalties of Pennsylvania Crimes Code 18 Pa. §4904 relating to unsworn falsification to authorities.

BY: Deborah Ann Bujdos 3-9-17

Deborah Ann Bujdos

Deborah Ann Bujdos 3-10-17